

**Oadby and Wigston Local Plan: Pre-Submission Consultation Document (Regulation 19)
Representations on behalf of the University of Leicester**

Evidence Base

As part of the previous round of consultation, the University of Leicester (“the University”) expressed that it was keen to work with the Borough Council to establish any further baseline data and information that should be considered to inform the Local Plans.

We note that since we submitted these Regulation 18 representations, a new suite of Evidence Base documents have been prepared. These include the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA) (2017), the Oadby and Wigston Employment Land and Premises Study (2017), the South East Leicestershire Transport Study - Final Report 2017, the Oadby and Wigston Extended Phase 1 Habitat Survey (2017), the Oadby and Wigston Green Wedge Review (2017), the Oadby and Wigston Local Centers Study (2017), the Draft Infrastructure Delivery Plan (2017) and the Oadby and Wigston Local Green Space Assessment (2017).

We also note that some evidence documents are still being prepared including the Oadby and Wigston Playing Pitch Strategy.

In addition to the above, we note that the Pre-Submission Local Plan consultation document (“the PSLP”) has further considered the University and the student population in terms of their role towards providing increased economic investment and vitality in the Borough. The PSLP, although not explicitly, considers the way in which the University and students are shaping both the Borough’s and Leicester’s housing stock and how an acceptable mix of accommodation should be retained and provided.

While the Consultation Document does not provide any explicit figures relating to student numbers and purpose built student accommodation (PBSA), the University considers that it might be helpful to provide information on its current position. This information is provided in **Table 1** below.

Table 1 – Information on Student Numbers and Student Accommodation

Matter	UOL Response
Number of Students	<p>The University’s total student numbers (comprising full-time undergraduates and postgraduates) in 2012/13 was 14,947 students. The total student numbers at the end of 2015/16 was 16,004. This represents an increase of 7%. Of this, part-time student numbers in 2015/16 were around 2,545 students.</p> <p>Following the removal of the cap on student numbers, the University expects to grow steadily over the next four years, with the potential for over 18,000 full</p>

Matter	UOL Response
	<p>time students to be enrolled during the 2019/20 term. This represents a growth at the University of Leicester of approximately 15%.</p>
<p>Purpose Built Student Accommodation (PBSA)</p>	<p>The University undertook internal research into the number of purpose built or refurbished student bed spaces in 2012, which suggested a higher figure of 5,670 bedspaces.</p> <p>The University is currently working with Jones Lang Lasalle (JLL) to produce a Student Housing Demand Study. Initial results of the research suggest that, as of February 2017, there are a total of 15,128 PBSA beds available to both the University of Leicester and DeMontfort University, of which 11,820 are theoretically available to UoL.</p>
<p>Number of pipeline PBSA</p>	<p>As of January 2017, there were 1,592 PBSA beds in the pipeline, the breakdown of which is as follows:</p> <ul style="list-style-type: none"> • 500 beds to be completed by September 2017 (31%); • 972 beds granted planning permission (61%); and • 120 beds pending approval (8%).
<p>Number of bed spaces in university halls of residence</p>	<p>Of the 11,820 beds available to the UoL, 3,528 are owned and managed by UoL (1,832 beds at Oadby, 988 at Nixon Court, 358 at Mary Gee and 350 at Freemen's Common).</p> <p>UoL has a long standing nominations agreement with Opal Court which provides 655 beds taking the UoL total to 4,183 beds. UoL is due to take a further 550 beds under nomination for the 2017/18 academic year.</p> <p>The remaining 7,637 are PBSA and privately owned, operating as direct letting beds to students. We understand from the UoL's research that DMU own and manage 533 bed spaces and have a further 2775 under nominations agreements from privately owned PBSA (a total of 3308).</p>
<p>PBSA and HMO trends</p>	<p>Following research conducted in 2015 from a sample of UoL students who were residing in UoL accommodation, UoL concluded that 39% of returning students preferred to 'live out' in HMO's or PBSA and 29% would prefer to stay in University accommodation (either managed or owned).</p> <p>UoL has seen increasing demand for returner accommodation over the last 3 years, possibly due to the Article 4 restrictions on HMO's and therefore the supply not meeting the demand. The benefits of returning students staying in</p>

Matter	UOL Response
	<p>PBSA, is that it is more convenient in terms of organisation (bills, cleaning, maintenance etc.) and is usually closer to the University.</p> <p>Historically the University of Leicester had been able to accept 600-800 returning students within its owned/ managed accommodation however the figure has now reduced to no more than 300 due to the desire of first years to stay in our owned/ managed accommodation.</p>
Preferred unit size	<p>In the University's experience, there are some instances, where at the outset of applying for accommodation, students may believe that they need self-contained studios. However, in reality, cluster flats of ensuite accommodation with good sized social space is more preferable and creates a more conducive environment for students to transition into university life, providing opportunity for socializing at an early opportunity. For post-graduate students whose budgets will allow, studios are often a good fit.</p> <p>One of the major considerations with studio accommodation is price point. It is often the most expensive accommodation and therefore provides better yields per square metre. In order to provide inclusive accommodation and allow access to higher education for all, a ladder of rents should always be maintained. NUS research has provided much insight into affordability for students, something which does not appear to have been taken on board by developers.</p> <p>(https://www.nusconnect.org.uk/resources/nus-unipol-accommodation-costs-survey-2015).</p>

This information has also recently been shared with Leicester City Council through their Local Plan consultation exercise.

The University requests that if these figures, or any others, are to be included in the Local Plan or any Evidence Base documents it would be useful if the Borough could include the sources of all information stated.

Requirement for PBSA

UoL has a total number of 16,004 full time students (2015/16) and DMU a total number of 17,350 full time students.

UoL guarantee any student in their 1st year of study a place in University owned or managed accommodation, we understand DMU only guarantees accommodation to international students.

The two universities offer a combined total of 7,491 bed spaces, which are provided for approximately 26% of students at UoL and 19% at DMU.

With diminishing HMO's and a desire to continue to 'live in' university accommodation growth is required. University managed (i.e. nominated or owned by university) is preferable as it offers a greater guarantee of both quality and a greater opportunity for resolution, if issues exist. University managed accommodation guards the student experience and allows ability for students to move without penalty if issues arise. There is a tried and tested structure to deal with any support required i.e. integration into student life, support with mental health, socialisation activity. This support flows from accommodation through to academic study with a seamless network able to address concerns at each level of the organisation.

Within bed stock owned or managed by UoL the student to bed ratio is currently 3.66 students per bed. This is the median in the sector compared to a group of 10 universities with extremes as seen at Coventry of 8.17 students per bed and York being 2.72 students per bed. In order to satisfy demand the upper quartile region of 3.1 students to a bed should be targeted. The PBSA investment market looks at ratios of around 2.26 students per bed in order to make development viable. Locally, the geographical nature of the majority of city beds is that they are located around DMU, making them less attractive for UoL students. This is both because of demand (i.e. DMU own so few of their own beds) and due to availability of land in order to develop around the UoL site. Oadby continues to be oversubscribed with almost 2500 applications for 1800 beds.

In March 2017, UoL's demand was at 2.16 students per bed, this meant that the University was oversubscribed and has restricted the number of returning students that within university owned and managed accommodation due to the commitment to fulfil the 1st year guarantee.

In conclusion there needs to be growth in PBSA. A monitoring of other local authorities has shown that they are ensuring that this growth is jointly supported by their local universities. Some, for example, York have restricted any developments unless there is a nomination (either soft or hard) from one or both of their universities.

Chapter One – Introduction

Strategic Context

The University has significant economic, social, cultural and environmental roles and impacts within the Borough and it is important that the Local Plan acknowledges both these existing impacts and roles and the scope for the University's growth and investment to reinforce and enhance these. The University's land holdings combined with investment in the Borough has the potential to be a major contributor towards meeting some of the strategic needs identified by the Council in the PSLP.

The spatial strategy for the PSLP takes into account the wider Leicester and Leicestershire Housing Market Area and the Leicester Principal Urban Area (PUA). This is obviously important as whilst the University's physical campus is located within the neighbouring authorities, the University owns and manages significant land holdings within the planning jurisdiction of Oadby and Wigston Borough Council. Most notably this includes the halls of residence and sports grounds located within the north of the Borough, along Stoughton Drive South, Manor Road and Stoughton Road.

The Strategic Growth Plan

One of the key elements of the Strategic Growth Plan, which deals with the time period up to 2050, is the potential delivery of a vehicular expressway to the south and east of Leicester that links the M1 motorway with the A6, the A47 and the A46 (the Eastern District Distributor Road). The Council acknowledge that the expressway will significantly improve access to the motorway network, unlock new land for development and reduce the high levels of traffic and congestion in both the borough and the City of Leicester.

It is not clear from the Evidence Base currently available how the Council or its HMA partners have reached this conclusion on the deliverability of the expressway, or what efforts have been made to progress the scheme. This is somewhat surprising given the significant opportunities it could deliver in terms of housing, transport and delivery of strategic priorities both for the Borough and the wider Housing Market Area (HMA).

We note that the Council propose to commit to a review of the Local Plan within 5 years of the date of its adoption by which time it considers the proposals for the new expressway will be at a more advanced stage, and therefore its effects within the Borough will become a policy consideration. Again the evidence base for this assumption has not been provided and given that policies within the new Local Plan will mean that the expressway is a material consideration (e.g. Policy 18 Stoughton Grange Direction for Growth area and Oadby Cemetery Allocation) from adoption we consider that this evidence should be prepared and available for consideration at this stage. This is important because the consequences of not progressing it are significant in relation to long term housing delivery and also the ability to address any shortfall in both the Borough and the HMA in the medium term.

Duty to Cooperate

The University supports the duty-to-cooperate and suggests that the borough continues to explore how housing demands from across the HMA can be accommodated within suitable areas in the Borough across the period of this Local Plan.

The University has significant land holdings within the Borough and is willing to explore with it and other HMA partners how this land could potentially be used to help address housing and other strategic needs. This is discussed further under Chapter Six (Housing Delivery) below.

Chapter Two – Spatial Portrait

The University welcomes the statement at paragraph 2.3.11 (Social Characteristics) of the PSLP that the University of Leicester currently acts as one of the major land users, employers and catalysts (in Oadby) for inward investment in the Leicester Principal Urban Area (PUA), as well as within Oadby itself.

The PSLP recognises that the University has had a presence in the Borough for over 50 years and during this time has expanded its facilities which now provide student accommodation, conferencing and sports facilities. The sports facilities are considered to be used and enjoyed by local clubs and groups. The University

acknowledges as correct the statement in paragraph 2.3.11 that it *“plans to continue improving and expanding its facilities and replacing outdated accommodation”*.

Chapter Four - Sustainable Places

The PSLP recognises that much of the University of Leicester’s student accommodation, conferencing facilities and sports and recreational facilities are based at their campus in Oadby.

The University is committed to investment in their Oadby campus towards further education, skills, enterprise and academic growth. The information provided at the beginning of this letter and set out in Table 1 provides an indication of the University’s expected growth, some of which will be diverted towards Oadby.

Paragraph 4.4.3 states that the Council *“continues to support the general principle of enhancement of the University of Leicester’s Oadby Campus, however would encourage the preparation of a long term framework for its future development”*.

The University is committed to liaising and consulting with the Borough Council in relation to any future developments. As our previous representations have highlighted, small scale investment in the campus could be undertaken on a piecemeal basis or through the development and/or redevelopment of individual buildings. We consider that in those cases, the requirement for a masterplan or development brief as stated under emerging Policy 7.6 would not be applicable and the other emerging policies within the LPPO would be considered instead. Furthermore, we consider a bespoke policy supporting clearly defined objectives would be useful in this regard. This would afford the Council control over such matters. The University would welcome the opportunity of discussing such a policy with the Council.

Chapter Five – Cohesive Communities

The University supports the objective of Policy 4 (Creating a Skilled Workforce) which sets out that the Council will support development proposals that relate directly to the development of local skills, and training opportunities, particularly for young people and residents who are unemployed.

Policy 9 (Open Space, Sport and Recreation Facilities) states that the Council will seek to protect existing sites from development where there is a demand to retain them, they contribute towards the Green Infrastructure in the Borough, and the equivalent cannot be provided elsewhere. The policy states that existing open space, sport and recreational buildings and land, including playing fields, should not be developed or lost unless *“the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location”*.

The University agrees with the approach in Policy 9 that qualitative improvements to open space, sport and recreation facilities could potentially be achieved in the borough through the relocation, in certain instances, of existing facilities.

We suggest that paragraph 5.6.13 of the PSLP which sets out that *“all areas of open space, sports and recreational facilities will be protected and retained, not just those identified within the Council’s open space*

study and annual audits” is amended to better reflect the policy of allowing re-provision as permitted for under Policy 9.

We note that the Oadby and Wigston Playing Pitch Strategy is still being drafted and has yet to be finalised. If it would be helpful to the Council, the University would be happy to assist through provision of any evidence that might help inform this strategy.

Chapter Six – Housing Delivery

The Council’s Housing and Economic Development Needs Assessment (HEDNA) (2017) sets out that there is an Objectively Assessed Need of 148 new homes per annum from 2011 up to 2031 (a total of 2,960) in the Borough. The PSLP states that the Council is aware that the City of Leicester has declared an unmet need and will require help from other Leicester & Leicestershire HMA partners up to 2031 however the Council proposes to meet only its own need during the plan period.

We understand that following publication of the HEDNA for the HMA, both Leicester City Council and Oadby & Wigston Borough Council declared that they would not be able to accommodate their full OAN for housing within their own boundaries. Letters were sent out by the Council in March 2017, to all other authorities within the HMA, setting out the position and the Council’s formal declaration of unmet housing need. Since that time the Council now consider that it will be able to accommodate its needs in the period 2011-2031 but not in respect of the period 2031-2036. This position was set out in a further letter in November 2017.

The PSLP states that the HMA authorities, Leicestershire County Council and the Leicester and Leicestershire Enterprise Partnership (LLEP) are producing a (non statutory) Strategic Growth Plan that will act as the strategic planning framework for the HMS up to 2050. However the process of preparing the Strategic Growth Plan is not anticipated to be complete until the end of 2018.

We note that the Council took a paper titled “Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing” to Full Cabinet on 5 December 2017 which was prepared to demonstrate that all of the planning authorities are working together to meet the requirements of the duty to co-operate. This statement states at paragraph 2.9 that Oadby & Wigston Borough Council are yet to formally and finally evidence the extent of their unmet need.

Post 2031, the PSLP states that the strategy set out in the Strategic Growth Plan, for this period, will come into effect. One of the key elements to this strategy is the delivery of the expressway. As stated in our representations on Chapter One, given the importance of the expressway for meeting housing delivery and also providing some certainty on proposed allocations and safeguarded land, the lack of clarity on the realistic deliverability of the expressway is concerning and should be addressed.

Although, both the Council and the Joint Statement of Co-operation note that further work on capacity is still being undertaken, however, it is considered that even with new sites coming forward there will not be enough housing land in the HMA, to meet the full housing need.

The University wishes to discuss with the Council the opportunity to potentially promote some of their land for housing. For example, UoL owns a seven hectare site on Stoughton Road, Oadby which is considered to be appropriate for approximately 150 to 200 new dwellings.

The University is especially interested in discussing how existing residential properties, currently utilised by students, can be freed up for housing within the HMA, and the development of PBSA,, would be a method in achieving this.

In relation to housing choices within the Council the University agrees with Policy 11 which supports the development of student halls of that meets an identified need and is proposed in appropriate sustainable locations.

Chapter Seven – Allocations and Regeneration Opportunity

The PSLP identifies three areas for growth in the Borough and has allocated land accordingly. The northerly part of the Borough, along Gartree Road and Stoughton Road in Oadby is recognised as a growth area, and is referred to as Stoughton Grange Direction for Growth. This Growth Area is located on the opposite side of Stoughton Road to the University's sports fields.

Policy 18 refers to the Stoughton Grange Direction for Growth area and Oadby Cemetery Allocation. This allocation sets out that the Green Wedge designation will remain to the east of the site that is currently in use as the University's playing fields as well as arable land.

As set out or comments on Chapter Six (Housing) the University would like to discuss with the Council the potentially promotion of some of their land for housing, including a seven hectare site on Stoughton Road, Oadby which is considered to be appropriate for approximately 150 to 200 new dwellings.

Chapter Eight – Economic Prosperity

Sustainable Transport and Initiatives

An area of the University's land at Manor Road Sports Centre and Southmeads Field has for some time been safeguarded through the adopted Core Strategy for the delivery of a "Potential Transport Route" (former Eastern District Distributor Road). The Council propose to retain this safeguarding in the new Local Plan.

The Council's Local Transport Plan Phase 2 Study, which forms part of the Evidence Base, concludes that on the basis of preliminary studies it would not be appropriate to remove the safeguarding at this stage as further evaluation is required. Observations from Leicestershire County Council Highways Authority conclude that the preliminary work indicates that such a road would appear to have some merits.

The continued safeguarding of the University's land in the context of this preliminary work and current lack of certainty on delivery, constrains that part of the University's land reserved for the Potential Transport Route's alignment and also to some extent the development potential of some of its estate.

The NPPF states that Local Plans should be aspirational, but there is also a requirement for them to be realistic. The University considers that further evidence should be provided or an early review undertaken in relation to the deliverability of the Potential Transport Route and a programme provided for advancing it in the short term in order for the project to be considered realistic. In the absence of this we consider that any ongoing safeguarding would be unsound.

Chapter Ten – Protected Places

We note that Policy 42 (Green Wedges) allows outdoor leisure, recreation and sporting facilities to be developed within Green Wedges. As set out in our previous representations we consider that in some instances, indoor leisure facilities would also be appropriate, including within the Green Wedge by virtue of their complimentary relationship with the outdoor pitches.

Our previous suggestion to incorporate 'indoor leisure facilities' into this policy was considered by the Council and the Officer's response to this, as set out in the "Local Plan Preferred Options Consultation Representations November to December 2016 - Officer Responses" document, confirmed that the wording of Policy 42 would be amended to include "*and related indoor leisure*". We note that this amendment has not been made in the current PSLP Policy and request again that the Officer's amendment is made.

END