

Oxford's Housing Land Availability Assessment

1. INTRODUCTION

- 1.1 The Housing Land Availability Assessment (HLAA) was introduced in draft PPS3¹ in December 2005. At the same time, draft guidance² on the production of HLAA's was also published.
- 1.2 The HLAA provides information on the opportunities that exist to meet housing need within a specified area. The information in the HLAA will inform the Core Strategy DPD. The Core Strategy will set out the key elements of the planning framework for Oxford including spatial vision for the authority's area and the strategic policies required to deliver that vision.
- 1.3 An HLAA is not intended to do the job of a Development Plan Document. Whilst it will identify land it will not make a judgement about whether this is developable or not. It simply forms an evidence base for the Plan.
- 1.4 Oxford City Council produced an Urban Potential Study (UPS) in July 2005 which rolled forward information in the two Urban Capacity Studies (UCS) of June 2002 and February 2003. The aim of the UPS was to collate the data in these previous documents while taking account of the most recent housing data to create an up-to-date urban potential for Oxford. This information was then used to inform the Local Plan in preparation for its adoption which occurred in November 2005. The UCS and UPS were based upon guidance contained in *Tapping the Potential*³. This guidance will be superseded once the HLAA guidance is finalised.

- 1.5 The key outputs of an HLAA are to:

- assess the level of unimplemented permissions and their likelihood of being brought forward to completion in the plan period;
- assess land availability by identifying sites that have development potential for housing and assess the level of potential;
- evaluate past trends in windfall brownfield land coming forward for development and estimate the likely future implementation rate;
- assess developability by identifying constraints that might make the site unavailable and/or unviable for development;
- identify sustainability issues and physical constraints that might make the site unsuitable for development; and
- identify interventions that could be made to overcome constraints on particular sites.

Context and targets

- 1.6 In 2000, Planning Policy Guidance note 3: Housing (PPG3)⁴ was published. This was a step change in Government policy towards providing sufficient housing by using land efficiently by increasing densities and giving priority to re-using previously-developed land within urban areas.
- 1.7 An amendment⁵ to PPG3 was published in January 2005 which required local authorities to consider releasing employment land for housing to meet targets. The City Council has produced an Employment Land Study to inform the Core Strategy. We are also looking to undertake a study that assesses the role of the hospitals and educational establishments in Oxford's economy and the level of need for their expansion. Similarly we are looking to undertake a study assessing the level of need

¹ *Draft Planning Policy Statement 3 Annex B* (December 2005), ODPM.

² *Housing Land Availability Assessments: Identifying appropriate land for housing development – draft practice guidance* (December 2005), ODPM.

³ *Tapping the Potential* (December 2000), DETR.

⁴ *Planning Policy Guidance note 3: Housing* (December 2000), DETR.

⁵ *Supporting the Delivery of New Housing* (January 2005), ODPM.

for hotel accommodation in Oxford, both of which have an impact on land availability. Each of these studies will be considered in parallel to this HLAA.

- 1.8 Draft PPS3 sets out a new approach for planning for housing, including the identification of sufficient land for the plan period of 15 years, ensuring that the first 5 years are allocated and developable and that the five year supply is maintained as sites are developed out. The role of the Core Strategy is not to allocate sites for housing but to identify broad areas or type of land for housing.
- 1.9 The draft South East Plan⁶ policies on housing provision seek to ensure that adequate levels of housing provision are delivered and make better use of land. Policy H3 says that within the region as a whole, over the 2006-2026 period at least 60% of additional housing should be provided on previously developed land (PDL).
- 1.10 The Oxfordshire Structure Plan⁷ states that local planning authorities should seek to maximise the proportion of new dwellings built on previously developed land in accordance with national and regional guidance, while maintaining total housing delivery at the levels required to fulfill the required provision.
- 1.11 Whilst 52% of the Oxford City Council area is open space⁸ it offers significant opportunities for reusing PDL. Therefore policies have sought to maximise the use of brownfield land. Past housing completions have far exceeded the South East Plan target for building on PDL. During 2005/06, 99.43% of the gross number of housing completions in Oxford was on PDL compared to the target of 60%.

⁶ Section D3, *Draft South East Plan* (March 2006) SEERA

⁷ Policy H1, *Oxfordshire Structure Plan* (October 2005) Oxfordshire County Council

⁸ *Oxford City Green Space Study* (August 2005) Scott Wilson.

2. METHODOLOGY

- 2.1 The HLAA guidance sets out the 6 key steps of the assessment:

- Step 1. Establishing the process with partners
- Step 2. Identifying the geographical area to be covered by the study
- Step 3. Considering the sources of supply
- Step 4. Quantifying the supply
- Step 5. Determining the likely level of windfall
- Step 6. Considering developability

- 2.2 It is anticipated that we will consult on the draft HLAA at the same time that we consult on the Core Strategy preferred options which will be in early 2007.

Step 1: Establishing the process with partners

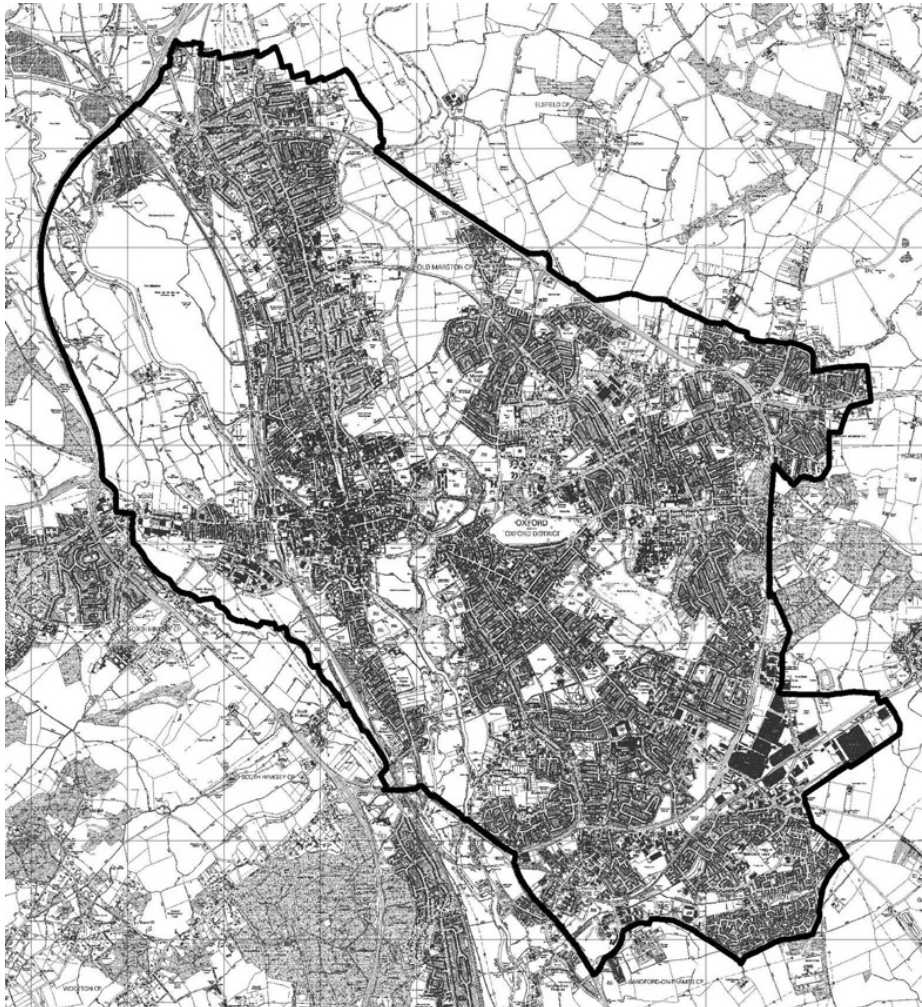
- 2.3 Local authorities are expected to establish links with partners (statutory bodies, local organisations, landowners, developers etc.) in order to agree the methodology of the assessment. Issues regarding methodology could relate to the reliability of data, key assumptions made, threshold for identifying sites and the particular stages of the assessment. The consultation on this draft methodology is to allow partners to raise any issues with the methodology.
- 2.4 At the same time as consulting on this draft methodology, we have contacted a wide range of landowners and agents in order to identify sites that might become available for development up to 2026. This will assist us in the identification of sites as it will utilise the knowledge of the landowners and agents on the availability of sites. A list of those contacted on the methodology and regarding potential sites are at **Appendix 1**.

Step 2: Identifying the geographical area

- 2.5 Draft PPS3 advises that where two or more local authorities form a sub-regional housing market area, they should either work together and produce a joint assessment or ensure consistency in methodology.
- 2.6 The five local authorities in Oxfordshire are considered to encompass one sub-regional housing market so to undertake a joint study would be a difficult logistical exercise not least because each authority is at a different stage of either their Core Strategy and/or Site Allocations DPD. South Oxfordshire District

Council has almost completed a HLAA and therefore it is considered sensible to produce a HLAA that only covers the Oxford City Council area.

- 2.7 Where the HLAA is undertaken for a local authority area it "should identify all settlements where housing could be provided, not just the main urban areas. The intention here is to not make a judgement about whether a place would be appropriate for housing or not. This is the role of the plan making process and Sustainability Appraisal. It is important to take a wide and objective look at all potential sources of housing."⁹



Administrative boundary of Oxford

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⁹ Paragraph 10, *Housing Land Availability Assessments: Identifying appropriate land for housing development – draft practice guidance* (December 2005), ODPM.

- 2.8 Oxford has significant sections of open space and Green Belt running through the city which give the city some distinct built-up areas. There are two main areas. The first extends from the city centre northwards and encompasses Jericho, Walton Manor, Summertown, Sunnymead and Cutteslowe. The second main area surrounds the Southfield golf course and contains the more eastern and southern areas containing Headington, Marston, Old Marston, Barton, Cowley, Rose Hill, Littlemore, Blackbird Leys and Greater Leys. In addition to these two areas, there are two 'fingers' of development extending along Botley Road (incorporating Osney) and Abingdon Road (Grandpont and New Hinksey). Wolvercote also has its own separate distinct built-up area.
- 2.9 The HLAA is not intended to make a judgement on whether or not new housing should be contained only within existing built-up areas. It is proposed that the HLAA should assess capacity within and outside of built-up areas in order to obtain a clear picture of the housing potential of the whole of Oxford. The Core Strategy DPD will propose options for the broad location of new housing based on the evidence set out in the HLAA

aspect of the evidence it will feed into e.g. small site windfall trends; large site windfall trends; large site identification or a combination. Detailed information on each of the sources can be found in the HLAA guidance.

Step 3: Considering the sources of supply

- 2.10 The City Council's HLAA is being undertaken for the Core Strategy so the output of the assessment will provide the evidence for the following elements of the housing policies:
- Broad identification of a 20 years supply for future development
 - Determination of a realistic windfall allowance
- 2.11 The HLAA will provide an evidence base reflecting the period of the Core Strategy and the South East Plan (towards 2026), although it is recognised that there is a higher degree of uncertainty the further towards 2026. The HLAA can be updated as part of the Annual Monitoring Report and Plan, Monitor and Manage process.
- 2.12 The HLAA guidance sets out the sources of housing supply to be considered. Table 1 shows these sources of supply and to which

Table 1

<i>Source</i>	<i>Small site windfalls</i>	<i>Large site windfalls</i>	<i>Large site identification</i>	<i>Method</i>
Sources in the existing stock				
Subdivision of existing housing	✓	-	-	Use historical data of permissions from Oxford City Council to establish trend. Not possible to survey.
Flats over shops	✓	-	✓	Use historical data of permissions from Oxford City Council to establish trend. Possible source from identified large mixed use sites. Difficult to survey.
Empty homes	✓	-	-	Use Oxford City Council information on current empty properties.
Intensification of existing areas (development of housing on backland/ gardens)	✓	✓	-	Use historical data of permissions from Oxford City Council to establish trend. Difficult to survey.
Redevelopment of existing housing (demolition and replacement of a dwelling with a greater number of dwellings)	✓	✓	✓	Use historical data of permissions from Oxford City Council to establish trend. Housing Development Team may be able to identify opportunities in the social housing stock.
Brownfield land (PDL)				
Previously developed vacant and derelict land and buildings (non housing)	✓	✓	✓	Use historical data of permissions from Oxford City Council to establish trend. Information from landowners and developers to identify site potential.
Conversion of commercial	✓	✓	✓	Use historical data of permissions from Oxford City Council to establish trend. Information from landowners and developers to identify site potential.
Redevelopment of car parks	-	-	✓	Survey of existing car parks. Many car parks allocated in the Local Plan so unlikely to be a potential new source.
Other sources				
Review of existing housing allocations in Plan	-	-	✓	Consider whether existing estimates of capacity are appropriate.
Review of other existing allocations in Plan	-	-	✓	Consider the potential for non-housing sites to be reallocated for housing.
Land not previously developed including greenfield sites	-	-	✓	Information from landowners and developers to identify site potential.
Unimplemented/outstanding planning permissions (commitments)	-	-	-	Use data from Oxford City Council

Site size

- 2.13 A large site is considered to be any site with a capacity for 10 or more dwellings or at least 0.25ha in area. This stems from the Local Plan policy requirement that the minimum density of residential development should be 40 dwellings per hectare. The approach of the HLAA is designed around potential yields rather than site area alone so it is more flexible.
- 2.14 The guidance says that some local flexibility on the size criterion is necessary. Oxford is a very compact city and therefore it would not be sensible to set the threshold for large sites too high otherwise there could be few large sites identified. This threshold is also the same as the

long established system used in Oxfordshire to monitor housing permissions and completions.

- 2.15 Where an opportunity is identified on a site that is smaller than the indicative size thresholds (0.25ha) but could clearly satisfactorily accommodate ten or more dwellings, it will be included in the large site assessment. This is more likely to relate to City centre sites where higher densities are more appropriate.

Completions and commitments

- 2.16 Oxford City Council records information on housing completions and permissions over past years. Completions and commitments form the first stage of the housing potential of Oxford from 2006 to 2026.

Small site windfalls

2.17 Table 1 sets out the sources to be considered as potentially contributing to the small site windfall supply (less than 10 dwellings). These are:

- subdivision of existing housing;
- flats over shops;
- empty homes;
- intensification of existing areas;
- redevelopment of existing housing;
- previously developed vacant and derelict land and buildings (non housing); and
- conversion of commercial.

Large site windfalls

2.18 Table 1 sets out the sources that should be considered as potentially contributing to the large site windfall supply (10 or more dwellings). These are:

- intensification of existing areas;
- redevelopment of existing housing;
- previously developed vacant and derelict land and buildings (non housing); and
- conversion of commercial.

Identified large sites

2.19 Table 1 sets out the sources that should be considered as potentially contributing to the identified large site supply. These are:

- flats over shops (as part of identified mixed use schemes);
- redevelopment of existing housing;
- previously developed vacant and derelict land and buildings (non housing);
- conversion of commercial;
- redevelopment of car parks;
- review of existing housing allocations in Plan;
- review of other existing allocations in Plan; and
- land not previously developed including greenfield sites.

2.20 Due to the time constraints on producing this evidence for the Core Strategy, we are not intending to do a detailed map study of every piece of land in Oxford to identify large sites. However, because a large proportion of dwellings are developed on small sites, it is not considered that excluding

the detailed map study for identifying large sites will significantly affect the overall potential. Allowances could be made for this in the large site windfall potential.

2.21 The method for identifying large sites is to contact landowners, developers and land agents to invite them to suggest suitable sites for consideration as having potential for housing development.

2.22 The types of opportunities we will be looking for are land, or a building or group of buildings, part or all of which could be appropriate for housing or for a mixed use to include housing and which meets the following tests:

- it could accommodate 10 or more dwellings; and
- is likely to become available for development or redevelopment in the next 20 years; and
- it is evidently underused; or
- it might reasonably be expected to be targeted for development.

2.23 Once the suggested sites have been collated, we will undertake a two-stage process of eliminating sites if their development would be contrary to national and local planning policies. This is because the purpose of the HLAA is to assess Oxford's potential considering current planning policies.

Stage 1: Sites will be eliminated from the identification process if their development for housing would be contrary to these key current national planning policies:

Green belt – there is a presumption against inappropriate development on Green Belt land (PPG2 and Local Plan Policy NE.2);

Flood Plain – there is a presumption against development in the flood plain (PPG25 and Local Plan Policy NE.7);

National nature designations – there is a presumption against development if it has a significant adverse impact on Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs) (PPS9 and Local Plan Policy NE.18)

Stage 2: Sites will be placed in a secondary group (but not eliminated) if their development for housing would be contrary to the following Local Plan planning policies:

Greenfield development – there is a presumption against developing greenfield land unless it is already allocated in the Local Plan (Policies CP.4 and HS.2);

Safeguarded land – this will be kept free to fulfil its purpose of meeting possible long-term development needs which could be required for non-residential land use needs (Policy NE.3)

Agricultural Land – the agricultural value of land will be taken into account in determining applications for development (Policy NE.4);

Low-lying land - permission will only be granted on low-lying land where the criteria of the policy are met (Policy NE.8);

Local nature designations – there is a presumption against development if it has a significant adverse impact on Sites of Local Importance for Nature Conservation (SLINCs) or Local Nature Reserves (LNRs) (Policy NE.19);

Employment sites – there is a presumption against development that would result in the loss of key employment sites (Policies EC.2). The conclusions in Oxford's Employment Land Study¹⁰ suggests that it may be necessary to allocated further existing employment land as key employment sites including, potentially, some safeguarded land;

Primary health care facilities – there is a presumption against development that would result in the loss of Primary health care facilities (Policy HH.1);

Indoor sports facilities - there is a presumption against development that would result in the loss of existing indoor and outdoor sports facilities, including school playing fields (Policies SR.1 and SR.2);

Public open space - there is a presumption against development that would result in the loss of public open space including parks, common land, nature parks and historic cemeteries (Policy SR.5);

Allotments - there is a presumption against development that would result in the loss of allotment in active cultivation (Policy SR.8);

Community facilities - there is a presumption against development that would result in the loss of community facilities (Policy SR.15);

Public houses - there is a presumption against development that would result in the loss of a pub (Policy RC.18).

2.24 The policies and supporting text are set out in the Oxford Local Plan 2001-2016 www.oxford.gov.uk/localplan

2.25 The sites that remain will be considered as primary sites for the purpose of the HLAA. These primary sites should have the greatest potential for development by having no, in principle, planning policy constraints.

2.26 This method will enable the HLAA to assess the potential to which Oxford can meet its housing target by these primary sites alone. Should the HLAA conclude that our housing targets

¹⁰ *Oxford Employment Land Study* (March 2006) Nathaniel Lichfield and Partners

cannot be met under these policies, the Core Strategy document will need to consider whether a change in policy approach will have to take place in order to deliver our housing target. The HLAA will be able to clearly indicate the effect a new policy approach will have on the delivery of housing in Oxford.

- 2.27 Each primary site identified will be assessed for its suitability, its viability and its deliverability during the period to 2026 (See Step 6).
- 2.28 An appendix will contain the results of the site assessments, indicating why certain sites have been eliminated at stage 1 or put in the secondary group at stage 2.

Review of existing sites allocated for housing

- 2.29 Sites that are allocated in the Local Plan for residential or mixed use residential will be revisited to consider whether they could be developed at a higher density or whether a lower density is more appropriate considering the strategic mix set out in the Affordable Housing SPD.

Review of other existing allocations

- 2.30 Sites that are allocated in the Local Plan for non-residential use will be revisited to consider whether they could be developed for housing. These sites will be considered in the light of existing Local Plan policies.

Step 4: Quantifying the supply from identified large sites

- 2.31 Having identified the opportunities for additional housing the next stage is to assess the number of units that can be accommodated on each of the sites and in each of the buildings identified. Tapping the Potential¹¹ sets out two approaches to estimating yields from identified sites:
 1. density multipliers – using standard densities and multiplying them with the area of each site to obtain yields;
 2. design based approaches – designing layouts on a varying sample of the sites and applying the results to the remaining sites.

- 2.32 There is the potential for a large number of sites to be identified in Oxford. A design based approach may therefore be extremely resource intensive.

- 2.33 Density multipliers is an acceptable method for quantifying supply. The Local Plan includes a minimum residential density of 40 dwellings per hectare although on the majority of sites, higher densities are more appropriate as illustrated in the Annual Monitoring Report¹². An appropriate density will also need to consider the mix of dwellings that would be expected on residential sites in order to comply with Policy HS.8 of the Local Plan and the strategic mix in the Affordable Housing SPD.

- 2.34 There is a need for care when applying density multipliers. It is not just a case of adding up the total area of potential sites and multiplying it by a density. This is because the density at which a site can be developed will vary depending not just on the policy context but on its size, configuration and the need for supporting facilities.

- 2.35 An approach to address this complexity would be to vary the net density depending on the size of the site, using a banding approach and to vary the density depending on the location of the site (city centre or out-of-centre) similarly to the method applied to the strategic mix in the Affordable Housing SPD. Draft PPS3 also indicates density levels appropriate to different types of areas.

- 2.36 It is recognised that there are some drawbacks to using density multipliers over a design based approach. However, time constraints have resulted in the need to produce an HLAA in a robust but expedient manner. Further information on the density multiplier approach can be found in Tapping the Potential.

¹¹ *Tapping the Potential* (December 2000) DETR

¹² Indicator 3, Annual Monitoring Report 2006, Oxford City Council

Step 5: Determining the likely level of windfall

Small site windfalls

- 2.37 Over recent years there have been a significant number of dwellings delivered through small site windfalls in Oxford. Due to the shortage of large sites generally available in Oxford, small windfall sites are likely to continue to be a significant source of housing in the future. However, there is concern that too many family sized dwellings are being converted into smaller flats and so a study is currently being undertaken to assess the most appropriate mix of dwellings that should be developed in Oxford. This might result in the trend of conversion declining in future years.
- 2.38 Small site windfalls are difficult to survey. For example, in theory, each family sized house dwelling has the potential to be subdivided into smaller dwellings but only some will be proposed as such and those that are will not all necessarily gain planning permission depending on the merits of the particular proposal and the forthcoming Balance of Dwellings SPD. Similarly, with intensification, there are many houses in Oxford with back gardens large enough to build one or more new dwellings but as every site is individual, each site would need to be considered on its merits which would be an overwhelming task for this HLAA.
- 2.39 Therefore the most sensible way to assess the potential housing supply from small site windfall is by considering the trends from past housing completions. The Urban Capacity Study Update (February 2003) set out the small site trends from 1991-2001. A similar exercise will be conducted for the period 2001-2006. The data will be broken down into the seven small site windfall categories in Table 1 and will be used to establish emerging trends. This data will be expressed in graph and tabular form to reveal trends.
- 2.40 The HLAA is intended to consider supply until 2026 but it is recognised that the further into the future that the trend is extrapolated, the less accurate it will be. However, the past completion data might show certain consistencies which might yield a significant

level of confidence in the trends. Conclusions will be made on the accuracy of the small site windfall predictions once the data has been examined.

Large site windfalls

- 2.41 There is some scope within Oxford for large site windfalls but as with small site windfalls, by definition, it is difficult to predict when and how often these proposals will come forward. Large site windfalls are most likely to be the result of two types of development: the development of backland or large gardens (intensification) or the demolition of an existing dwelling and its replacement with more dwellings (redevelopment).
- 2.42 It is more likely that the other two types of large development (previously developed vacant and derelict land/buildings and the conversion of commercial) will be on land that could be identified. However it should not be ruled out that these two types of development could occur on windfall sites.
- 2.43 Large site windfalls will be assessed by considering past trends. The number of applications received for large site windfalls will be fewer than for small site windfalls so more caution will need to be taken when assessing trends.
- 2.44 The Local Plan contains policies that require sites of 10 or more dwellings or of 0.25ha in size to provide 50% affordable housing. The Local Plan was adopted on 11th November 2006. The introduction of a new policy with tougher affordable housing requirements and a lower threshold is generally expected to result in a period of reluctance on the part of landowners to releasing their land for redevelopment. It is therefore considered likely that the number of large site windfalls might experience a reduction in the coming years although, considering past experience, it is not thought that the reduction will be permanent.

Discounting the potential

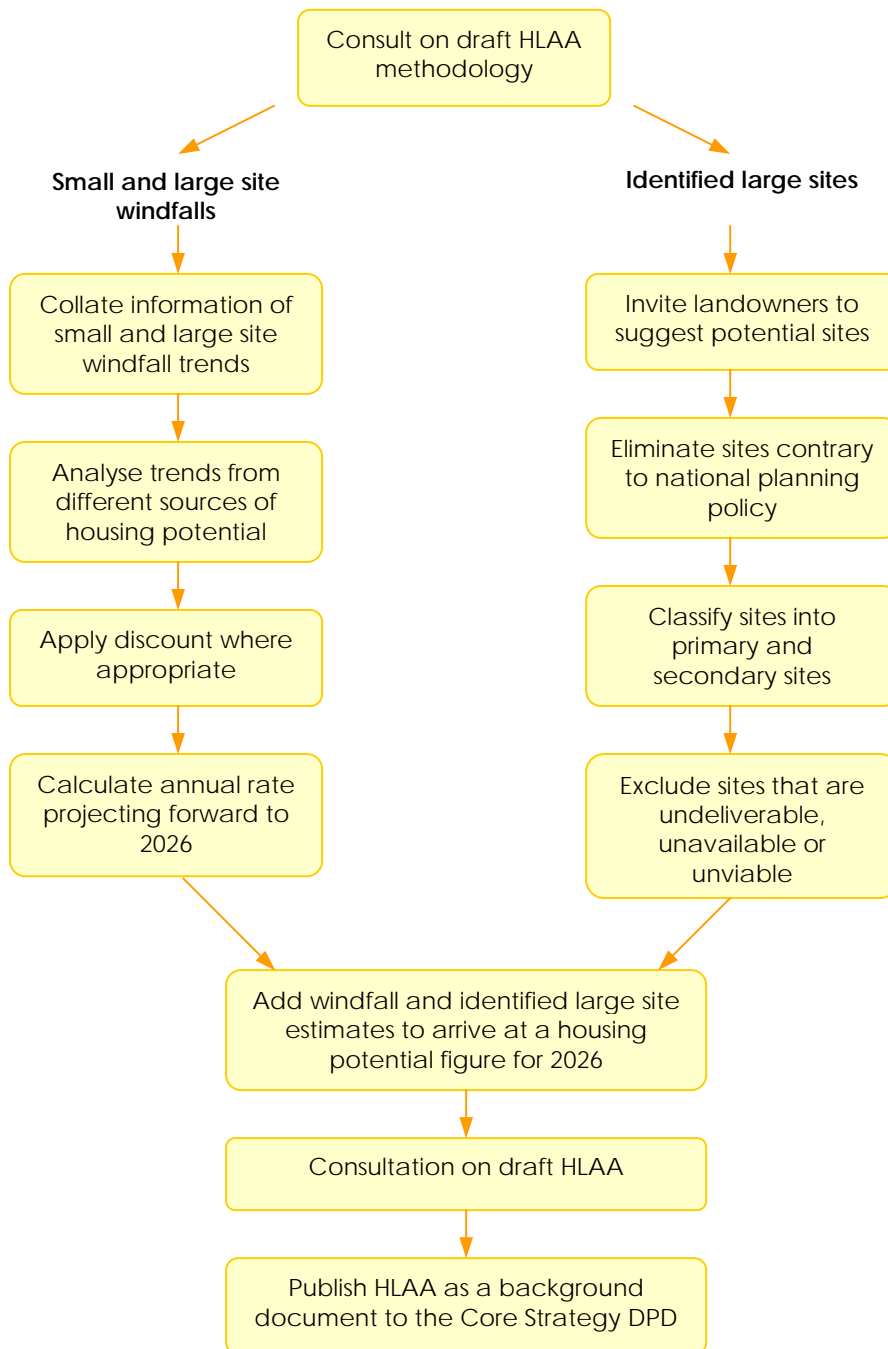
- 2.45 We will assess whether it is appropriate to discount the sources of supply to prevent the total assessed capacity being undermined if some sites do not, for whatever reason, come

forward for housing or if some sites produce fewer dwellings than anticipated. However, the housing market in Oxford is strong so it is not anticipated that any discount will be large.

Step 6: Considering developability

- 2.46 This final stage is to consider whether sites are genuinely available for development and are realistically developable in the short (2006-2011), medium (2011-2016) and long term (2016-2026).
- 2.47 Information will also be sought from landowners and developers on any ownership or other constraints which might dictate the timeframe in which the sites they suggest might come forward.
- 2.48 It is for the HLAA to identify potential sites and their constraints but for the plan making process (in this case the Core Strategy) to assess constraints and make a judgement as to the extent to which they are developable.
- 2.49 We will consider whether the sites are available, suitable and viable. Further information is available in the HLAA guidance.

SUMMARY OF METHODOLOGY



Appendix 1

PARTNERS CONSULTED ON THE METHODOLOGY AND TO SUGGEST SITES

	Consulted on methodology	Consulted to suggest sites
GOSE	✓	
SEERA	✓	
Environment Agency	✓	
Home Builders Federation	✓	
Housing Corporation	✓	
English Heritage	✓	
Natural England	✓	
Kemp and Kemp	✓	✓
John Philips Planning Consultancy	✓	✓
West Waddy ADP	✓	✓
Carter Jones	✓	✓
Barton Wilmore Planning Partnership	✓	✓
Savills	✓	✓
RPS Group Plc	✓	✓
Oxford University		✓
Oxford Brookes University		✓
Oxford Radcliffe NHS Trust		✓
Oxford Mental Healthcare Trust		✓
Oxfordshire Learning & Disability		✓
Oxfordshire Ambulance NHS Trust		✓
Nuffield Orthopaedic Centre NHS Trust		✓
Oxford Primary Care Trust		✓
BRB (Residuary) Ltd		✓
Thames Water Property Services		✓
Thames Valley Police		✓
Oxford Bus Company		✓
Oxfordshire Community Land Trusts		✓
British Waterways		✓
Riach Architects		✓
Linden Homes (Chiltern) Ltd		✓
Bovis Homes		✓
David Wilson Homes Southern		✓
Banner Homes Group		✓
Berkeley Homes		✓
Cala Homes (Midlands) Ltd		✓
Fairview New Homes Ltd		✓
McCarthy & Stone Plc		✓
Kingerlee Ltd		✓
JA Pye (Oxford) Holdings Ltd		✓
Bromford Housing Association		✓
Oxford Citizens Housing Association		✓
Warden Housing Association		✓
Catalyst Housing Group		✓
A2 Housing Association		✓
Thames Valley Housing Association		✓
English Churches Housing Group		✓
Oxford City Council		✓
Oxfordshire County Council		✓