


Oxford Core Strategy Examination Statement of Oxford City Council		<a href="http://www.oxford.gov.uk">www.oxford.gov.uk</a>  <b>OXFORD CITY COUNCIL</b>
C/M5/1	<b>Matter 5 – Housing Issue 1 – Housing land supply</b>	

**A The requirement**

- i) **If the opportunities are available, should the plan not seek to provide more than the RSS requirement, treating it as a minimum figure, allowing for development beyond the 8,000 dwellings? If so, what are the implications for the plan’s approach to housing provision?**

The South East Plan (CD10/1, para 22.12) removed the phrase “at least” from its overall housing target. It is now not a minimum, but likewise it is also not stated as a maximum. Oxford has never sought to restrict housing on appropriate sites and has never had a policy with an upper housing limit as a reflection of the historical and continuing huge need for housing.

However, to have a higher target would require both the justification and the capacity to deliver it. There is no question that the Strategic Housing Market Assessment (CD14/5, Appendices B and C) provides the justification of housing need but it is the capacity of Oxford that is the constraint. Any target greater than 417 dwellings/yr would mean we would be unable to show 5 years worth of deliverable sites (i.e. Table 18 of the SHLAA update (CD15/1) shows Oxford has 2,089 dwellings in its 5-year deliverable supply of sites:  $2,089/5\text{yrs} = 417.8$  dwellings/yr which excludes windfalls).

A higher target would require the consideration of sites on land types previously excluded in the SHLAA (CD14/1) namely Flood Zones 3a and 3b, national nature conservation sites and allotments. Even then, it would not necessarily present sites that were deliverable within 5 years.

If new housing opportunities arose on brownfield sites, either as identified sites or as windfalls, the policies are currently worded so as not to prevent their delivery. Decisions would of course still be subject to all other policies in the Core Strategy and other DPDs, but suitable sites would be allowed to come forward as and when they present themselves thereby allowing for development beyond the 8,000 dwellings.

## **B Provision for new housing**

### **ii) Does the plan make adequate quantitative provision for new housing?**

The provision is not adequate to meet overall need but it is adequate to meet our SEP target of 8,000 dwellings between 2006-2026. Policy CS23 reflects this by providing for 400 dwellings annually equating to 8,000 dwellings. The need for all types of housing is much greater but there is not the capacity to meet need (to meet demand over a 10-year period would mean at least doubling the size of Oxford). Oxford must also balance housing needs against other development needs.

### **iii) Is there a sound evidence base to justify the figures given in Appendix 4?**

The SHLAA (CD14/1) and SHLAA update (CD15/1) were produced following in detail the stages of the SHLAA Practice Guidance (CD12/8). The CLG's recent consultation document on Land Supply Assessment Checks<sup>1</sup> selected 55 random Local Authorities and assessed their SHLAAs. It is disappointing that Oxford was not selected as part of the random sample as we are confident that our SHLAA would have come out well. The summary of the CLG's key findings lists their 'good practice' points and, if judged on these, we consider that we would be likely to score very highly. The production of the SHLAA involved the development industry at a number of stages. We consulted them on the methodology back in Nov 2006. Developers, agents and landowners were also contacted specifically to identify new sites and at the same time requested their opinion on the deliverability of the sites. For the SHLAA update, some were contacted again where a further update on sites and their deliverability was necessary. The intention is that the development industry will be contacted each time the SHLAA is updated (annually) in order to retain their involvement and utilise their expertise in the deliverability of sites. Also, during its production, we met with officers from the neighbouring districts to discuss best practice in SHLAA production.

The SHLAA was also presented as part of the Council's case at a planning appeal (APP/G3110/A/08/2070447 - Oct 2008) extracts from which were interrogated by the appellant's counsel. That Inspector did not comment on it suggesting that she did not accept the appellant's arguments that challenged its robustness.

### **iv) What does the SHLAA say about the capacity of the area to deliver this level of housing?**

In summary, the SHLAA (CD14/1) update says that for the 20-year period of 2006-2026 Oxford has enough suitable land to deliver 5,853 dwellings of the 8,000 target. This indicates that despite a detailed SHLAA investigating opportunities on a wide range of land types, with the assistance of landowners and developers, Oxford is not

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<sup>1</sup> <http://www.communities.gov.uk/publications/planningandbuilding/landsupplychecks>

currently able to identify enough land to deliver it's overall housing target. This is unsurprising considering that Oxford has consistently delivered way in excess of it's housing target in recent years (e.g. in 2005/06 more than double the amount of housing was delivered compared to the target) and so now there are much fewer opportunities with very small amounts of vacant land. Also, Oxford is a constrained urban area where many sites are very small sites which tend to deliver windfall dwellings. This is an important source which will enable Oxford to meet its overall target in the latter 10 years of the Plan.

**v) Is there at least a 15 year supply of identifiable land available or, if not possible for years 11-15, are the broad locations realistic?**

Oxford has enough deliverable sites for the first 5-year supply and enough deliverable and developable sites for the first 10-year supply without relying on windfalls. Just one site can be identified for the 11-15 year period. PPS3 (CD 11/3, para 55) is clear that we are not expected to be able to identify specific sites for years 11-15. Oxford is a heavily constrained urban area, with a tightly drawn Green Belt and it also has extensive areas of flood plain constraining land supply but has still managed to identify enough sites for a 10-year supply through in-depth consideration of opportunities.

The other broad locations where housing is likely to come forward are set out in Section 3.5 under 'estimated windfall dwellings' and is based upon the proportions of past trends. The very nature of them being windfall dwellings means their location is unknown but past trends are a very good indication of the broad locations where windfalls are likely to come forward because they depend on the attractiveness/popularity of the area, the local facilities and the opportunities presented by the character of the existing dwellings/plots and these factors are generally stable. Apart from land with intrinsic designations and protective policies, windfalls are not to be discouraged anywhere in Oxford because everywhere is a sustainable location. It is therefore realistic to expect windfalls to come forward in the broad proportions where windfalls have in the past.

The Core Strategy does not have a policy explicitly promoting windfall development in particular areas of Oxford. This is because it is questionable whether such an 'encouragement' policy would actually result in an increase in windfalls in a particular area. Oxford always has been, and will remain, a magnet for housing developers due to the attractiveness of the city and high land values. This is borne out by the high proportion of windfalls that have been delivered in past years. It is not considered that a policy encouraging windfalls in a particular area would result in more windfalls coming forward in an already appealing area. In fact, it is likely to have the opposite effect as planning applications for windfalls *outside* such a policy area may be looked upon unfavourably due to the fact that they are not within the

policy area. It is considered unrealistic that a sustainable location like Oxford would actually wish to have such a policy promoting windfalls in specific areas when all areas are generally equally suitable.

**vi) Does the plan inappropriately rely on a 30% windfall development over the first 15 years?**

The Core Strategy does not rely on windfalls during years 1-10. The SHLAA update is clear that windfalls are likely to come forward across the Core Strategy period but that there are enough sites identified for years 1-10. Windfalls are not actually being relied upon for these first 10 years (SHLAA update para 10.36). The Core Strategy relies on windfalls to deliver the total of 8,000 dwellings but only actually needs them during years 11-20. The SHLAA update (Stage 10) assesses a realistic yield from windfalls to be 3,400 dwellings over 20 years, which is more than the 2,147 required to meet the 8,000 target.

**vii) Could other sites have been identified?**

It is not considered that any other suitable sites could have been identified. Over the course of the Core Strategy, through updates to the SHLAA and Site Allocations DPD, new sites are likely to emerge which will further reduce the reliance on windfalls during years 11-20. These may include parts of Council estates within the regeneration areas that the Council may look to redevelop and other City Council owned land emerging from the Draft Asset Management Review Plan; further County Council and University owned land emerging from future reviews of their assets; and any other sites ceasing to be required for their current use but that are currently unidentifiable.

Land availability is a 'moving feast' as new sites could emerge at any time, for example, during production of the SHLAA update it became apparent that the Council were considering options for redeveloping the Cowley Community Centre site. A report by the Community Housing and Community Development Service Area of the Council is scheduled to go to City Executive Board in July 2009 where recommendations for the redevelopment of the site will be considered which may or may not include housing. Pending a decision on the options, it is not sensible to include it within the SHLAA as a suitable and deliverable/developable housing site. If housing is considered appropriate, it will be added to the next SHLAA update.

**viii) How robust and flexible is the supply to meet immediate needs?**

The immediate supply (first 5 years) was identified through the SHLAA (CD15/1), which is a robust analysis of land availability and deliverability as summarised in (iii) above. Each annual SHLAA update and the Site Allocations DPD will identify further sites to add to the supply. As well as the identified sites, there is likely to be an element of windfalls. Whilst this is not being relied upon during the first 10 years, they

will still come forward and will help provide a 'cushion' if unforeseen circumstances mean that an identified site is not delivered.

The current economic climate has seen a slow down in housing completions however, Oxford's past housing completions far exceeded housing targets and whilst the trend has shown a reduction, completions still remained well above the required target as shown below (data extracted from Annual Monitoring Report 2008 CD7/25):

Year	Local Plan Target	Net housing completions
2003/04	433	578
2004/05	433	669
2005/06	433	943
2006/07	433	821
2007/08	433	529

The SHLAA also took a very cautious approach when assessing the level of windfalls estimating 175 per year, whereas recent years had seen an average of almost 400 windfall dwellings (SHLAA update Stage 10). It was considered prudent to underestimate the figure rather than overestimate not least in case the economic climate affected the housing market significantly. Any slow down is likely to be temporary so this will be reviewed every year. It is worth noting that a slow down in the housing market is likely to be felt less in Oxford than other areas for a number of reasons (discussed in detail in the SHLAA paras 8.3-8.14):

- Households are less able to gain credit so demand falls but in places like Oxford, where existing need is so high, the need still remains meaning Oxford will be less affected.
- Historically the number of jobs in Oxford has exceeded the resident workforce (although this imbalance has narrowed over recent decades). A slow-down in the housing market would have less impact on the Oxford housing market than it would in other places where the ratio is reversed. The existence of a greater number of jobs keeps demand strong in Oxford.
- Properties let to students, and other shared houses is a feature of the Oxford market, and this sector is less exposed to a potential down turn for the simple reasons that the average property has been held for longer and interest payments on debt are less, whilst yields are higher.

**ix) How is the supply to be managed?**

Due to the huge need for housing, and affordable housing, the approach is not to hold back or phase the delivery of any of the sites to ensure that housing is delivered as soon as possible.

**x) Should there be further contingency sites?**

The SHLAA has managed to identify enough sites for the first 10 years and there will still be housing delivered through windfalls throughout the Core Strategy period, despite any short-term downturn in the housing market. So it is not central to the achievement of the strategy, or the required housing, that further contingency sites are identified.

**C Area specific provision**

**xi) How realistic are the figures given in Appendix 4 for each of the identified broad type of sites?**

*the residential allocated sites;*  
*sites with planning permission;*  
*“basic desktop study” sites;*  
*the CS strategic sites?*

Where there were existing permissions, their capacity was applied (e.g. 30% of the ‘Residential Allocated Sites’ have a permission on which capacity could be based). Where no permission existed, estimates were based upon policies in the Oxford Local Plan, Balance of Dwellings SPD, Core Strategy Preferred Options, and the West End AAP as recommended in the SHLAA Practice Guidance (CD12/8). Generally speaking, a good mix of dwellings can be achieved at a density of 50-60 dwellings per hectare and so 55dph was used as a starting point for all sites and where the site was in the city or district centres, densities were increased (e.g. for ‘Basic Desktop Study sites’ no permissions existed so density multipliers were used as well as the opinion of the landowner/developer who submitted the site). There is further detail in the SHLAA at paras 6.1-6.6. It is worth noting that recent preliminary work undertaken by consultants on options testing for the Land at Barton used the Balance of Dwellings SPD and masterplanning to assess the capacity of the site and their options ranged from 766 to 1,154 dwellings. This closely reflects the estimate of 800-1,200 shown in the SHLAA suggesting that the SHLAA estimates are sound in their basis.

*For each of these types:*

**xii) What is the evidence that the sites are available?**

Sites only need to be ‘available’ if they required to be ‘deliverable’ sites (PPS3, paras 54-55) (CD11/3). The following is a summary of the situation in the SHLAA Update.

*Residential allocated sites* - Of the 15 deliverable sites: 5 are under construction, 8 are vacant with evidence of keenness to develop and 2 are vacant with recent planning permission.

*Sites with planning permission* – Of the 16 deliverable sites: 10 are under construction, 2 are in the Oxford City Council development programme, 2 have planning permission with evidence of keenness to develop and 2 with extant planning permission.

*Basic Desktop Study sites* (the sites suggested by landowners following consultation) – Of the 8 deliverable sites: all 8 had an expression of keenness to develop by the landowner/developer. In 5 of the cases the landowners were the City or County Council.

*Core Strategy strategic sites* – Neither site is listed as ‘deliverable’ (so they needn’t be ‘available’), nevertheless Summertown landowners are keen for the site to be allocated (see Matter 8.5 statement) and Barton land is mainly owned by the City Council which is keen to progress.

**xiii) What potential constraints/opportunities are there?**

In relation to all four categories, only a few ‘deliverable’ sites have constraints and these can be overcome in a short time period. The main constraint identified for ‘developable’ residential allocated sites are that 3 are in Flood Zone 3a or b and so would require overcoming PPS25 (CD11/15). These were retained as suitable sites in the SHLAA because they were already allocated for residential in the Local Plan. Further updates since the April 2009 SHLAA update are available such as the Hernes House and Territorial Army sites now being vacant, that progress is being made on delivering the remaining affordable housing on the Manor Ground site and that planning permission has now been granted for Mabel Pritchard, St Nicholas House and Hernes House.

**xiv) What does delivery depend upon?**

Most ‘deliverable’ sites just depend on the willingness of landowners and developers to bring the sites forward and, as referred to in (xii), a large proportion have expressed intention and keenness. The current economic climate may have an impact on the delivery of some sites in the short term although Oxford is less likely to be affected as explained in (viii). We intend to proactively encourage the development of these sites using the City Council’s Strategic Housing Delivery Group (a corporate and cross-department group) to engage with landowners and developers to assist in the delivery of these sites.

Some 'developable' sites are currently occupied (by staff, tenants or pupils) which is generally the reason they were 'developable' and not 'deliverable' but there is an intention to relocate occupants (e.g. County Council intends to relocate pupils and staff).

**xv) Do the broad locations represent a sustainable pattern for new development?**

The identified sites are located city-wide. Every area of Oxford is a sustainable location as it is a compact city that extends at the most 6.2 km (3.8 miles) from the city centre. Oxfordshire County Council, on behalf of the districts, calculated how many dwellings were completed in Oxfordshire that were within 30 minutes' bus travel time to six key services (GP, hospital, primary school, secondary school, employment and retail centre). 100% of the dwellings in Oxford were within 30 minutes of 5 key services and 99.5% were within 30 minutes of a hospital (see Appendix 1).

**xvi) When is development likely to come forward?**

Extracting information on these four sources from the SHLAA update (Table 18), the sites are likely to come forward as split across the following time frames:

	2009/10 – 2013/14	2014/15 – 2018/19	2024/25 – 2028/29
<b>Residential allocated sites</b>	80.3%	18.4%	1.3%
<b>Sites with planning permission</b>	100%	-	-
<b>Basic Desktop Study sites</b>	76%	24%	-
<b>Core Strategy strategic sites</b>	10%	90%	-

Appendix 1 - Extract from *Oxford City - Local Development Framework Accessibility Indicators Technical Note*, Halcrow, Oct 2008

Oxford City LDF Accessibility Indicators - Technical Note

District	Completions		Retail			Primary Schools			Secondary Schools			Hospitals			GPs			Employment		
	Sites	Dwells	Sites within 30min	Dwells within 30min	% Dwells within 30min	Sites within 30min	Dwells within 30min	% Dwells within 30min	Sites within 30min	Dwells within 30min	% Dwells within 30min	Sites within 30min	Dwells within 30min	% Dwells within 30min	Sites within 30min	Dwells within 30min	% Dwells within 30min	Sites within 30min	Dwells within 30min	% Dwells within 30min
Cherwell	138	455	101	412	90.5	117	430	94.5	90	401	88.1	82	305	67.0	111	424	93.2	103	413	90.8
Oxford	163	598	163	598	100.0	163	598	100.0	163	598	100.0	156	595	99.5	163	598	100.0	163	598	100.0
South Oxfordshire	152	512	141	482	94.1	147	505	98.6	126	453	88.5	77	229	44.7	144	491	95.9	135	475	92.8
Vale of White Horse	72	448	67	442	98.7	69	444	99.1	65	435	97.1	33	304	67.9	68	443	98.9	64	439	98.0
West Oxfordshire	118	863	102	826	95.7	113	857	99.3	94	796	92.2	94	809	93.7	100	847	98.2	100	817	94.8
<b>Total</b>	<b>643</b>	<b>2876</b>	<b>574</b>	<b>2760</b>	<b>96.0</b>	<b>609</b>	<b>2834</b>	<b>98.6</b>	<b>538</b>	<b>2683</b>	<b>93.3</b>	<b>442</b>	<b>2242</b>	<b>78.0</b>	<b>586</b>	<b>2803</b>	<b>97.5</b>	<b>565</b>	<b>2742</b>	<b>95.3</b>

Figure 2: Accessibility indicator results for each Oxfordshire district