

www.oxford.gov.uk



**Oxford City
Council Local
Plan 2036**

*Assessing and Meeting
Housing Need*

BACKGROUND
PAPER

INTRODUCTION

Oxford has an urgent need for more housing, and it is widely recognised that demand is continuing to outstrip supply at an alarming rate. Oxford is an international city with a world renowned university and hospitals and an important part of the knowledge economy, and therefore increasing the supply of available and affordable housing is a priority in both attracting new people and retaining existing residents in the city. The continued economic growth of the city is dependent on adequate housing provision, yet economic growth is currently outpacing housing delivery. It is clear, and widely accepted, that within Oxford's administrative boundaries there are insufficient sites to meet the objectively assessed need.

The PPG states that:

'It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.'

This background paper explains how Oxford City Council has complied with guidance, and taken a thorough approach to identifying sites for potential housing development. The Council has made bold choices in drafting the policies of the Local Plan. This is to ensure that every opportunity has been taken to maximise housing delivery within the city's administrative boundaries.

CALCULATING OXFORD'S HOUSING NEED TO 2036

A SHMA was published in 2014 for the Oxfordshire Housing Market Area, to cover the period to 2031. Because of the complexities of working within a housing market area (Oxfordshire), which includes 5 different district councils, all at slightly different stages of plan preparation, the City Council commissioned an addendum-style report to supplement the 2014 SHMA to roll-forward to 2036 Oxford's OAN calculation. The SHMA roll-forward has used the same methodology as the previous SHMA, but has used the most up-to-date household forecasts and has re-calculated the implications of economic growth. A new calculation of housing need based on the Government's standard methodology set out in 'Planning for the Right Homes in the Right Places: Consultation Proposals' (2017) was not undertaken for a number of reasons. It is considered that exceptional circumstances justified the use of an alternative approach, as allowed for in the NPPF (paragraph 60). In particular all Oxfordshire Councils in this current round of local plans are working to deliver the housing need identified in the 2014 SHMA and it is important that Oxford's Plan is consistent with the plans prepared and made by other Councils, and that the preparation and adoption of the Plan is not delayed. Moreover, the Councils have received Growth Deal

funding to deliver these homes. The SHMA roll-forward has reflected current and future demographic trends and market signals, which reflect Oxford's particularly young and dynamic population demographic.

The Oxfordshire Local Planning Authorities (including Oxford City Council), working together as the Oxfordshire Growth Board, are working towards the development of a Joint Strategic Spatial Plan (JSSP) for the area. The preparation of the JSSP will include a new calculation of housing needs for Oxfordshire. This will use the procedures resulting from the current government consultation "Planning for the Right Homes in the Right Places". At the time of drafting the Local Plan and this background paper, the Government had not released a final draft of this document. Given the need for Oxford to progress its Local Plan in order to support the work of the other districts, the Growth Board and the JSSP, and given the almost certainty that the housing target in the Local Plan would need to be capacity-based, the decision was taken to commission an Oxford-only update to the existing SHMA to support the work of the Local Plan. Progressing with the Oxford update ahead of the new county-wide calculation of housing need for the JSSP means that the Local Plans of all the Oxfordshire authorities could progress as planned without any delay to them or to the JSSP. All other members of the Growth Board have been engaged in the development of the City's approach in progressing this update.

A new calculation of housing need based on the Government's standard methodology introduced by the Revised NPPF (2018) was not undertaken for a number of reasons. It is considered that exceptional circumstances justified the use of an alternative approach, as allowed for in the NPPF (paragraph 60). In particular all Oxfordshire Councils in this current round of local plans are working to deliver the housing identified in the 2014 SHMA and it is important that Oxford's Plan is consistent with the plans prepared and made by other Councils, and that the preparation and adoption of the Plan is not delayed. Moreover, the Council have received Growth Deal funding to deliver these homes. The SHMA roll-forward has reflected current and future demographic trends and market signals, which reflect Oxford's particularly young and dynamic population demographic. The conclusion of the SHMA roll-forward is that Oxford has a housing need of 1,400 dwellings per annum to 2036, giving a total level of housing need to 2031 of 21,000 (14,00 x15). Housing Employment Land Availability Assessment (HELAA) – a capacity based figure

As well as assessing housing need for Oxford, it is also necessary to look at Oxford's capacity to deliver housing. The Oxford Housing and Economic Land Availability Assessment (HELAA) 2018 assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The 2018 HELAA supersedes the 2016 HELAA, which itself superseded the SHLAA of 2014 to provide the latest assessment of supply of land for housing and for economic uses.

The HELAA does not determine whether a site should be allocated for development¹. It instead identifies sites that hold development potential and are considered to be deliverable during the plan period (until 2036). In accordance with the PPG², the HELAA assessment considers sites that have the potential to deliver five or more dwellings or economic units on at least 0.25 hectares (or 500m² of floor space) and above.

The HELAA estimates the capacity to be 8,620 for the period 2016-2036. This figure includes 1,020 dwellings an estimated windfall of 60 dwellings per year (excluding the first three years to avoid double counting).

Deliverable sites from the HELAA	7,600
Windfalls	60pa x17 = 1,020
Total 2016-2036	8,620

The HELAA has taken an ambitious and rigorous approach to assessing the development potential of sites. This thorough approach has been taken in an attempt to ensure “no stone is left unturned”. However, as a result it does carry a risk that some of the sites will not be delivered. As such a 10% buffer has been included in the figure to account for non-delivery as advised in the PPG Note³

The HELAA considers the supply of 8,620 homes to maximise what could be achieved because of the following considerations and assumptions in the study:

- The capacity identified includes sites currently designated as Green Belt. These are being reviewed through the Local Plan 2036 process, exceptional circumstances test, and Examination in order to be allocated for housing
- Sites with an element of FZ3b, 3a or 2 or any site over 1ha will require a more detailed site-specific Flood Risk Assessment as part of a planning application, which may impact on capacity. Any development proposals in FZ3a or FZ3b will also need to successfully pass the Sequential and Exceptions tests set out in national policy. A Flood Risk Sequential test has been carried out that supports allocation of sites within higher risk flood zones. A Strategic Flood Risk Assessment Level 2 has looked at the likelihood that sites in higher risk flood zones could pass the exceptions test at detailed application stage; only those sites where this is likely have been taken forward with an allocations policy.

¹ PPG *It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.* Paragraph: 003 Reference ID: 3-003-20140306

² PPG, Paragraph 010 Reference ID: 3-010-20140306

³ PPG Paragraph:037 Reference ID:3-037-20180913

IDENTIFYING POTENTIAL SITES

The City Council has taken an approach of 'leaving no stone unturned' to find sites suitable for development to meet the needs of Oxford. Potential sites have been identified through various methods and sources:

- i. Core Strategy allocated sites
- ii. Sites and Housing allocated sites
- iii. West End AAP identified sites
- iv. Other sites from the previous 2014 Strategic Housing Land Availability Assessment
- v. Calls for sites inviting landowners to nominate their sites (2014, 2016, Local Plan, continuous- new sites and updates were requested from major landowners, planning agents, public bodies, large institutions and registered providers)
- vi. Protected Key Employment Sites and those identified as Category 1 or 2 employment sites as part of the Local Plan 2036.
- vii. Other employment sites not protected (if greater than 0.25ha)
- viii. Local wildlife Sites and other sites of local importance for nature conservation
- ix. Protected Open Space designations (public open space, open air sports, allotments)
- x. Sites previously rejected through the Sites and Housing Plan process
- xi. Stakeholder consultation (Unlocking Oxford's Development Potential [Cundell] Report)
- xii. City Council department suggestions (Property/Leisure)
- xiii. Commitments (sites with planning permission or Prior Approval for housing, student accommodation)
- xiv. Sites refused planning permission or expired but suitable for housing/student accommodation in principle
- xv. Map survey (aiming to identify any other piece of land greater than 0.25ha)

ASSESSING THE LIST OF SITES

A three stage process was then followed to identify which of these potential sites should be included as proposed site allocation policies in the Local Plan. The three stages can be summarised as follows:

Stage 1 Assessment: Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints

Stage 2 Assessment: Assessment against the Sustainability Appraisal objectives

Stage 3 Assessment: Assessment against the Local Plan strategy and deliverability considerations

Stage 4 Assessment: More detailed assessments where further information was required (for example Strategic Flood Risk Assessment Level 2); biodiversity

surveys; further checks on access; heritage assessments and further checks on landowner intentions

Stage 1 Assessment

All sites underwent a Stage 1 filter process; sites were rejected for allocation for development at Stage 1 only if they were:

- i. a Special Area of Conservation (SAC) or Site of Special Scientific Interest;
- ii. greenfield in flood zone 3b;
- iii. less than 0.25 hectares in area⁴;
- iv. already at an advanced stage in the planning process (i.e. development has commenced).

Stage 2 Assessment

All sites that had passed the Stage 1 filter process were considered against the Sustainability Appraisal objectives. The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure. Sites were scored accordingly, however sites were only rejected for allocation for development at Stage 2 if they:

- i. were considered to be part of Oxford's Green Infrastructure network as determined in the Green Infrastructure Study;
- ii. had no potential access.

Stage 3 Assessment

All sites that had passed the Stage 2 assessment were considered in terms of deliverability and against the emerging Local Plan strategy. Sites were rejected for allocation for development at Stage 3 only if:

- i. it is unlikely to become available during the plan period (i.e. before 2036);or
- ii. the landowner has indicated that they have no intention to develop

In total 390 sites were rejected at stages 1, 2 or 3. The remaining 126 were then considered for a preferred option (in terms of use or protection) using the strategy of the Preferred Options document⁵.

Stage 4 Assessment

All sites that had passed the Stage 3 assessment and were therefore listed in the Preferred Options document as potential allocations were considered further before being taken

⁴ A site area greater than 0.25ha was selected for the inclusion of sites to the HELAA to avoid double counting smaller sites which would be picked up by windfall calculations and help produce a manageable list of sites?

⁵ HELAA November 2016

forward as an allocation in the draft Local Plan. Sites were rejected for an allocation for development in the draft Plan at Stage 4 only if:

- i. Development commenced following the Preferred Options stage;
- ii. the landowner, following representations at the Preferred Options stage or further inquiries if their intention wasn't clear at the preferred options stage, has indicated that they have no intention to develop for suitable uses;
- iii. further investigations and discussions with the highway authority about access have not identified potentially suitable access;
- iv. biodiversity surveys have shown the site to have local nature conservation interest worthy of protection
- v. The Strategic Flood Risk Assessment Level 2 suggested they would not pass the flood risk exceptions test at planning application stage.

The following sections set out the policy approaches being taken in the Local Plan that will help to maximise the amount of housing delivered. All of these approaches are reflected in the capacity calculations in the HELAA⁶.

Density and Building Heights

Oxford is a small city that is growing in population. However, it is constrained by its topography, green belt and built heritage. As a result land is scarce in Oxford and therefore it is imperative that land is used efficiently. Due to the lack of available land in Oxford, higher densities have been carefully considered, as well as the option to build taller buildings within the city. The NPPF states that:

'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site'

This NPPF is clear in its approach that where there is an existing or anticipated shortage of land to meet identified housing needs, planning policies should avoid low density development and make optimal use of each site. Land within Oxford is scarce, and therefore it is imperative that available land is used efficiently. In order to deliver crucial housing within the city, the possibility of taller buildings has been considered. However, due to the historic nature of the City, it is necessary that care is taken to consider whether new taller developments could have an impact on the setting of buildings that create the iconic 'dreaming spires'. Oxford's historic skyline is internationally recognised, and therefore care needs to be taken over the design and placement of taller buildings. Oxford City Council's approach to density and tall buildings in different parts of the city and the reasoning behind

⁶ In the updated HELAA there were 431 sites assessed, with 95 taken forward to Table B which lists the developable sites.

this is outlined in a separate background paper related to density and the efficient use of land. The adopted policy complies with the NPPF, and ensures that sites make efficient use of available land by maximising the density of housing on site.

Green Belt

Oxford's Green Belt has a tight boundary that borders Oxford's built-up urban area. It extends for approximately six miles in each direction around the city and importantly preserves the historic setting of Oxford and also prevents urban sprawl. Within Oxford's administrative boundaries 1,287ha of Green Belt Land exists. Although it provides a necessary and important function, it also presents a major constraint on the City's potential for growth. The areas of Green Belt both within and around the City present large areas of floodplain, and ecological and historical sensitivities.

Due to the tight administrative and Green Belt boundaries surrounding Oxford, the number of sites available for housing development within the City's existing urban area is very limited. Reviewing Oxford's Green Belt is one of the many ways the City Council is considering all reasonable options to deliver more housing within the city whilst still adhering to the NPPF principles on sustainable development. It is crucial it is reviewed⁷ in order to ensure that as much of Oxford's own housing need is delivered within the city as can be sustainably accommodated.

Consequently, the 2017 Oxford Green Belt Study was commissioned by the City Council and undertaken by Land Use Consultants (LUC). The final report published in May 2017 forms part of the evidence base for the Local Plan 2036. An addendum was produced in July 2018 to look at 3 additional sites that were suggested following the Preferred Options stage.

The study reviewed eleven (plus the 3 additional) parcels of land within the City's administrative boundary against the five nationally defined purposes of the Green Belt. The eleven sites were identified in the 2016 HELAA, and the subsequent Call for Sites in 2017. The three additional sites were identified by the Council in 2017. Much of the Green Belt land in Oxford is undevelopable due to environmental constraints such as the floodplain and SSSI designations. The Green Belt study therefore only focused on sites/parcels within the Green Belt that are potentially developable (i.e. they do not have insurmountable environmental constraints) and deliverable within the plan period. The study drew conclusions on the relative harm (or otherwise) to the Green Belt that may result from their potential release for development. If they had not already been promoting the site, landowners were contacted to check interest. Sites were not progressed if the landowner

⁷ The NPPF explains that the local planning authority should have examined all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances justify changes to Green Belt boundaries. These circumstances have been demonstrated, and further information on this can be found in Background Paper on Green Belt.

had no intention of developing or selling for development the site during the Plan period. Figure 1 shows the fourteen sites alongside their associated harm ratings associated with the release of each parcel of land.

Figure 1: Green Belt sites and the relative harm to the Green Belt caused by their release for development

Site	Parcel	HELAA Site name	Size (ha)	Harm Rating
107		St. Frideswide Farm	3.95	Moderate
112a	112a-1	Cherwell Valley/ Old Marston	3.47	Moderate
112a	112a-2	Cherwell Valley/ Old Marston	13.53	High
112b	112b-1	Land at Old Marston	1.84	Low-Moderate
112b	112b-2	Land at Old Marston	20.39	High
112b	112b-3	Land at Old Marston	3.02	High
112b	112b-4	Land at Old Marston	7.46	Moderate*
112b	112b-5	Land at Old Marston	6.43	Moderate-High
112b	112b-6	Land at Old Marston	19.11	High
112c	112c-1	Brasenose land in 112b	2.82	Moderate-High
112c	112c-2	Brasenose land in 112b	7.89	High
113		East of Redbridge Park and Ride	3.64	Moderate
114		Field at junction of Marsh Lane and Elsfield Road	1.70	Moderate-high
114b		Showman's Field	2.18	Moderate high
114d		Marston Paddock	0.78	Low-Moderate
115		Land West of Meadow Lane	2.24	High
190	190-1	Court Place Farm Allotments	3.51	Moderate-high
190	190-2	Court Place Farm Allotments	2.42	High
462		Park Farm, Marston	1.56	Moderate
464		Land adjacent to Seacourt P&R	37.25	High
562		St. Catherine's College	0.69	Low
590		Pear Tree Farm	2.03	Low-Moderate

**It is worth noting that although this site has a 'moderate' harm rating, the landowner has indicated that it is not available. It is therefore not considered 'deliverable' and as such has not been progressed further.*

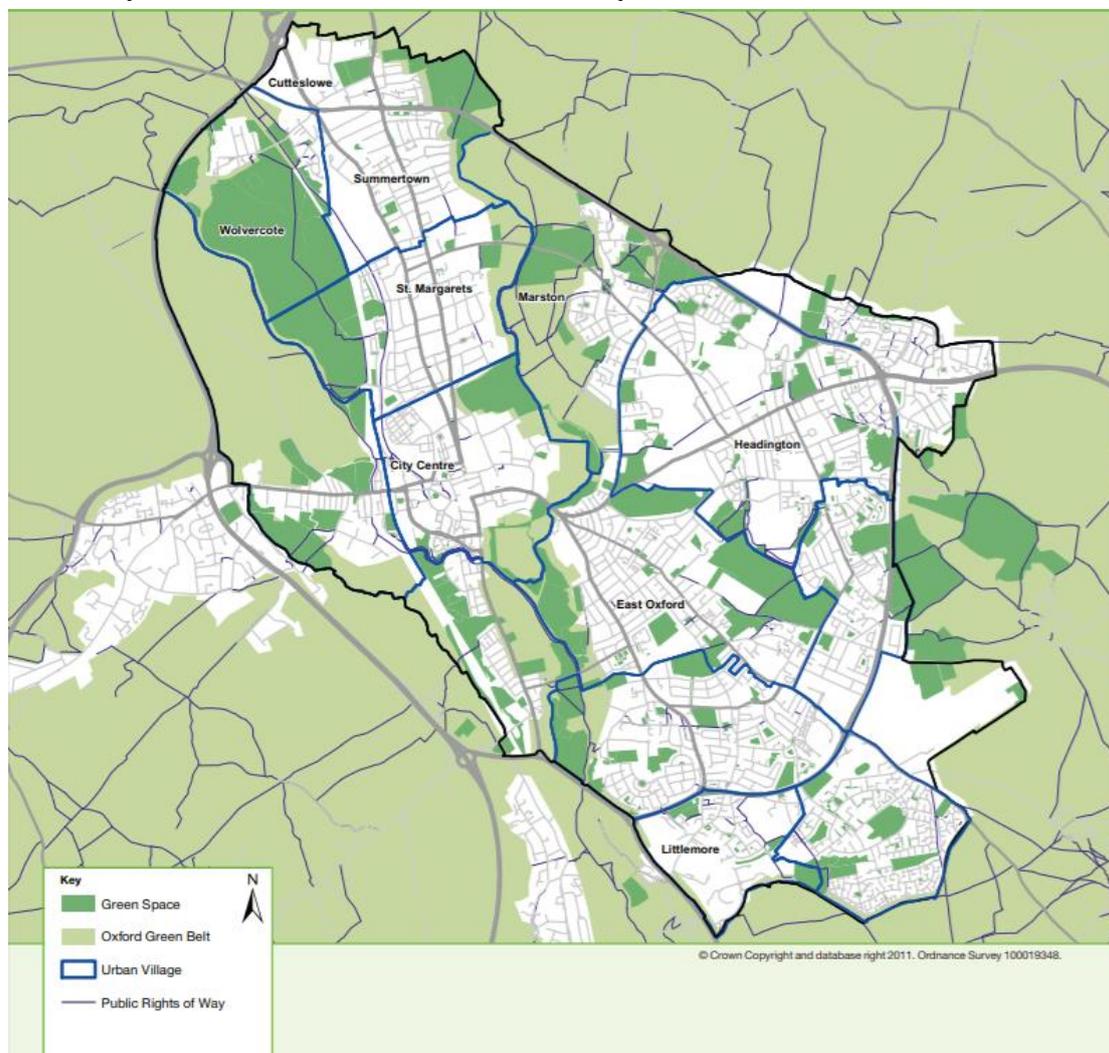
As a result of this study, some sites in the Oxford Green Belt have been identified for release and consequently allocated for housing. However, only sites with up to a moderate impact would be released for development in order to ensure the integrity of the Green Belt is protected. If only sites with up to a moderate impact rating were released, a total area of 17.96ha would come forward to meet the development needs of the city. The release of 17.96ha represents only 1.4% of the total 1,287ha of Green Belt within Oxford's

administrative boundary. The Green Belt Review Background Paper contains further information and provides the justification behind the release of Green Belt land.

Green Infrastructure

Oxford's green infrastructure holds an important role within the City. The City benefits from a great variety of green spaces that are not only valued by local people, but perform important social, economic and environmental functions. The NPPF defines green infrastructure as: "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities."⁸. Indeed Oxford's vast range of green spaces fulfils the NPPF's definition⁹. Figure 2 depicts the extent of the Green Spaces and Green Belt within Oxford's administrative boundary.

Figure 2: Map of Oxford's Green Belt and Green Spaces



Source: Oxford Green Spaces Strategy 2013-2027¹⁰

⁸ DCLG (March 2012) National Planning Policy Framework – Annex 2: Glossary

⁹ PPG Paragraph: 005 Reference ID: 37-005-20140306

¹⁰ https://www.oxford.gov.uk/downloads/file/2874/green_space_strategy_2013-2027

However, due to Oxford's urgent need for growth, the current and future role of Oxford's green spaces have been reconsidered. Those green spaces that do not provide important social, economic or environmental functions offer the opportunity to be considered for future housing development. It is important to emphasise that whilst a number of green spaces may be developed in the future, opportunities for new green spaces may also arise as a result of these future developments. Alternatively, financial contributions from new development could also improve the quality of the existing network.

The Oxford Green Infrastructure Study has identified Oxford's green spaces and has assessed their social, environmental, and economic functions. Green spaces (either privately or publically owned) with an area of 1000m² or more were assessed. Suitable sites that were identified through the study have been subsequently assessed through the HELAA. A policy change in the Local Plan 2036 allows potential development on greenfield sites, whereas previously this was only possible in the event that the City Council was not meeting a 5-year housing land supply. Therefore, if a greenspace is not otherwise protected from development because of its value assessed in the Green Infrastructure study, and if it is promoted by the developer with the suggestion that mitigation measures are possible, then green spaces are included in the HELAA capacity assessment.

Flood Plain

Previously developed land can only meet a limited supply of Oxford's economic and housing need, and therefore there is a need to look at a range of sites including those in the Flood Plain for potential future development.

A considerable proportion of Oxford is at some risk of flooding. The South and West of Oxford, as well as Lower Wolvercote, have a particularly high risk of flooding as they lie within Flood Zone 3, meaning these areas hold a 1% or greater annual risk of flooding.

The PPG states that when it has been concluded that insufficient sites have been identified against objectively assessed needs, then *'Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints)'*¹¹. As a consequence, the development potential of sites in Flood Zone 3a has been reconsidered. Furthermore, because of the pressing need for housing and the potential for development of existing brownfield sites to lead to considerable improvements in flood-risk management measures, previously developed sites in Flood Zone 3b have also been considered.

The NPPF allows only water-compatible uses and essential infrastructure in Flood Zone 3b, preventing the reuse of existing buildings in areas at highest risk of flooding. The approach

¹¹ PPG, Paragraph: 026 Reference ID: 3-026-20140306

of the Local Plan policy is to allow very careful re-development of existing brownfield sites in Flood Zone 3b. Given the scarcity of land within the City, the careful re-development of existing brownfield sites in Flood Zone 3b provides the opportunity to deliver further housing within Oxford whilst potentially improving the flood risk situation. This is because the policy sets out conditions for development in Flood Zone 3b that will ensure the flood risk situation is improved.

Policy RE3: Flood Risk Management

Planning permission will not be granted for development in Flood zone 3b¹² except where it is for water-compatible uses or essential infrastructure; or where it is on previously developed land and it will represent an improvement for the existing situation in terms of flood risk. All of the following criteria must be met:

- a) it will not lead to a net increase in the built footprint of the existing building; and*
- b) it will not lead to a reduction in flood storage (through the use of flood compensation measures); and*
- c) it will not lead to an increased risk of flooding elsewhere; and*
- d) it will not put any future occupants of the development at risk.*

Planning applications for development within Flood Zone 2, 3a and 3b, on sites larger than 1 ha in Flood Zone 1 and in areas identified as Critical Drainage Areas must be accompanied by a Site Specific Flood Risk Assessment (FRA) to align with National Policy. The FRA must be undertaken in accordance with up to date flood data, national and local guidance on flooding and consider flooding from all sources. The suitability of developments proposed will be assessed according to the sequential approach and exceptions test as set out in Planning Practice Guidance.

Planning permission will only be granted where the FRA demonstrates that:

- a) the proposed development will not increase flood risk on site or off site; and*
- b) safe access and egress in the event of a flood can be provided; and*
- c) details of the necessary mitigation measures to be implemented have been provided.*

Minor householder extensions may be permitted in Flood Zone 3b, as they have a lower risk of increasing flooding. Proposals for this type of development will be assessed on a case by case basis, taking into account the effect on flood risk on and off site.

Where development sites are within the proposed defended area of the Oxford Flood Alleviation Scheme (OFAS), which will provide protection up to the 1 in 100 year (1%) flood

¹² The functional floodplain is defined as 'Flood Zone 3b', and corresponds to the 5% (1 in 20 year) chance of flooding on the EA flood model.

scenario, both the defended and undefended data may be taken into consideration. Where properties lie within Flood Zone 3b, defended levels will be taken into account with regards to whether the development is appropriate, on the condition that flood mitigation measures are included up to the undefended level, to provide some protection in the event of a breach.

The policy has consequently allowed for further sites to become available that lie within Flood Zone 3b as long as they comply with the conditions set out in the policy.

Oxford Flood Alleviation Scheme

Additionally, a decision on the submitted planning application for the Oxford Flood Alleviation Scheme is expected by the end of 2018¹³. This is a partnership project helping to convey water away from development infrastructure, helping to greatly reduce flooding in the most high risk areas. This improvement will allow reduced flood risk to homes, businesses, major roads and the railway. Therefore, further sites may become available as a result of the reduced flood risk.

Employment Sites

In order for the Council to ensure that all reasonable sites for housing have been thoroughly explored, existing employment sites that are not performing well or which make an inefficient use of land are being considered for alternative uses, including housing. The Local Plan sets out a hierarchical approach to employment categories, ranging from Category 1 and 2 sites which are afforded the most protection, to Category 3 and B8 uses which have more flexibility and potential to be released from employment uses for other purposes such as housing to ensure the best use of land. Therefore a number of Category 3 employment sites hold potential for future housing development.

In regard to Category 3 employment sites, Local Plan policy E1 states that:

‘Category 3 sites: Planning permission will only be granted for the loss of any employment floorspace on Category 3 sites to residential development subject to the following criteria:

- a) the site or building is no longer suitable for its existing business use owing to its changing operational needs; and*
- b) no other future occupiers can be found despite substantial evidence to show the premises or site has been marketed both for its present use and for potential modernisation or regeneration for alternative employment-generating uses, including start-up businesses or local community uses, for a period of at least 6 months.’*

This policy holds greater flexibility in allowing the loss of employment floorspace on Category 3 sites to residential developments, subject to the necessary criteria being met. It therefore allows for Category 3 employment sites to be redeveloped for housing, and for

¹³ <https://www.gov.uk/government/publications/oxford-flood-scheme/oxford-flood-scheme>

the identified housing need to be more easily accommodated within the city's administrative boundary.

Parking Levels

Limiting the opportunities for parking within the City not only leads to benefits such as reductions in air pollution and congestion, but also results in available land being used more efficiently. Reducing the number of parking spaces within the City allows for further land to become available for housing development, and thus more housing being delivered within the City's boundaries.

Oxford has a large number of Controlled Parking Zones (CPZs) within the city, as well as plentiful walking and cycling routes and excellent public transport. This allows for a high number of successful car free housing opportunities to arise within Oxford. As a result land can be used more efficiently, as higher density development can be delivered on sites where parking would otherwise be present. Consequently, where a development is car-free, the only parking spaces available will be for visitors, disabled people, car clubs, and businesses and services reliant upon parking (where this is integral to their nature, operational and/or servicing requirements e.g. emergency services).

Figure 3 sets out the adopted parking standards for residential developments that do not lie within a CPZ and are over 400m from a regular bus service (15 minutes) and over 800m from a convenience store.

Figure 3: Appendix 7.3 Parking Standards

<i>Houses (of any size) including HMOs</i>	<i>1 space per house (may be allocated or unallocated)</i>
<i>Flats (of any size)</i>	<i>Car-free, plus operational, disabled and car club parking up to 0.2 spaces per dwelling</i>
<i>Wheelchair accessible or adaptable houses and flats</i>	<i>1 space per dwelling, to be provided on-plot (must be designed for wheelchair users)</i>
<i>Retirement homes</i>	<i>1 space per 2 residents' rooms</i>
<i>Sheltered/extra care homes</i>	<i>1 space per 2 homes plus 1 space per 2 staff</i>
<i>Nursing homes</i>	<i>1 space per 3 residents' rooms plus 1 space per 2 staff</i>

Residential development that lies within a CPZ and is located within a 400m walk of frequent public transport services and 800m walk of a local supermarket or equivalent will only be granted planning permission if it is car-free. In implementing this policy, the council are ensuring that any available land is developed most efficiently.

SETTING THE HOUSING TARGET FROM THE CAPACITY ASSESSMENT

The HELAA has found Oxford’s capacity from 2016-2036 to be 8620 dwellings. The OAN calculated in the SHMA roll-forward is 1000dpa, which is well beyond the number of units deliverable within Oxford.

As the OAN is much higher than what can be realistically achieved within the City, the Local Plan has set a capacity based housing target. This sets a minimum target of new homes to be delivered by 2036, reflecting:

- The capacity and availability of land
- The need to provide for a mix of homes to support the growth of sustainable communities
- The need to provide land for other essential uses (i.e. employment, retail, health and education facilities, as well as community and leisure facilities)
- The need to respect the historic, built, and natural environment of the city.

The minimum housing target has been established, and is 431 dwellings per annum.

The identified need contrasts with the identified capacity for accommodating new housing in Oxford for the period 2016-2036. The HELAA figures provide us with a snapshot in time of landowner intentions, current national policy, and information regarding site constraints and viability. These factors are all vulnerable to change, and therefore it is unlikely that every site will come forward for development during the plan period up to 2036. Unforeseen circumstances can have an influence on these factors, such as economic conditions and site specific circumstances. Additionally, sites that were not identified in the HELAA may also come forward during this period.

In order to set a housing target that is likely to be deliverable, an adjustment was made to the capacity identified in the HELAA to reflect that not all sites identified in the HELAA are likely to come forward as expected. In order to make this adjustment, an comparison was made between the number of houses predicted to be delivered in the year ahead according to the housing trajectory to the number of houses actually delivered in that year. This found that delivery was on average 10% lower than that predicted in the housing trajectory, so an adjustment of 10% was made. The lower delivery rate in the earlier years shown in Figure 6 is attributable to the financial crisis which had a dramatic impact on the housebuilding industry for several years.

Year	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18
Predicted delivery	1030	633	212	391	129		206	274	390

<i>from previous year's trajectory</i>									
Actual completions	257	200	228	213	215	332	383	373	249
	25%	32%	108%	54%	166%	50%	186%	136%	64%

DELIVERING HOUSING: POLICY APPROACH

The policy approach to delivering housing reflects the Council's commitment to meeting its housing needs as far as possible within Oxford's administrative boundaries over the plan period 2016-2036.

The policy sets out how the housing target will be achieved, as well as the sources through which housing will be delivered. Additionally, the policy sets out the number of dwellings the neighbouring districts will build to support Oxford's unmet housing need.

The housing target is a minimum rather than maximum number of units, encouraging further housing sites to be allocated as they are identified. Additionally, in order ensure the delivery of housing within the City, when considering the uses for allocated sites, housing is identified as the principal or only use on the vast majority of sites.

Policy H1, which details the scale of new housing provision, is as follows:

Policy H1: The scale of new housing provision

Provision will be made for at least 8620 new homes to be built in Oxford over the plan period 2016-2036. This equates to a delivery of 431 dwellings per annum.

This will be achieved by:

- a) making site allocations in this Plan (see Chapter 9 site allocations); and***
- b) promoting the efficient use and development of land/sites, including higher densities and building heights in appropriate locations (see Chapter 6 on Heritage and Design); and***
- c) ensuring that all new housing developments contribute to the creation and/or maintenance of mixed and balanced communities.***

Housing will be delivered from the following sources:

	<i>Deliverable sites from the HELAA</i>	7600	
	<i>Windfalls</i>	60pa x17 = 1,020	
	<i>Total 2016-2036</i>	8620	

Provision for Oxford housing needs is also being made in adjoining districts within the wider Housing Market Area as follows:

<i>Cherwell Local Plan Partial Review: Oxford unmet needs</i>	<i>4,400 (Plan submitted March 2018, Examination Autumn 2018)</i>
<i>South Oxfordshire Local Plan 2033</i>	<i>3,750 (Plan to be submitted by 31 March 2019)</i>
<i>Vale of White Horse Local Plan Part 2</i>	<i>2,200 (Examination July 2018)</i>
<i>West Oxfordshire Local Plan</i>	<i>2,750 (Adopted September 2018)</i>
<i>Total provision towards Oxford unmet needs by 2031</i>	<i>13,100</i>

Any additional unmet need for the period post 2031 will be addressed through the preparation of the Joint Spatial Plan, and if applicable further rounds of apportionment. Duty to Cooperate

The PPG states in relation to the objectively assessed need that *'If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate¹⁴'*.

The city's housing delivery target does not match the objectively assessed need figure, and thus there is a 'duty to cooperate' with other Oxfordshire authorities in order to address the needs of the Oxfordshire housing market area. This work has primarily been overseen by the Oxfordshire Growth Board (which comprises of representatives from all six local authorities) who work together to address the challenge of housing delivery in Oxfordshire.

Significantly, The Oxfordshire Housing and Growth Deal was secured by the Oxfordshire Growth Board in February 2018, awarding £215m of Government investment for new homes and infrastructure across Oxfordshire. All six local authorities signed the deal that both supports and commits the Oxfordshire authorities to work together to deliver the 100,000 new homes required between 2011 and 2031 (as identified in the 2014 SHMA).

¹⁴ PPG, Paragraph: 026 Reference ID: 3-026-20140306

Additionally, all six Oxfordshire authorities have committed to producing a new Joint Statutory Spatial Plan (JSSP). The JSSP will cover period up to 2050 and will provide a strategic planning framework for Oxfordshire. Importantly, the JSSP will cover key elements relating to housing and economic growth needs as well as the necessary infrastructure to support it. This will include how to deal with the objectively assessed housing need for Oxford in the period 2031-2050, and how that of which cannot be met within the administrative boundary of the city will be met by other authorities.

Therefore, although within Oxford's administrative boundaries there are insufficient sites to meet the objectively assessed need, the neighbouring local authorities have agreed to meet that of which cannot be met within the City.

APPORTIONMENT OF OXFORD'S UNMET HOUSING NEED

The National Planning Policy Framework (NPPF) requires local authorities to '*provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas*¹⁵', unless any of the following criteria can be demonstrated:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*¹⁶

Oxford's housing need was established through the Oxfordshire Strategic Housing Market Assessment (SHMA) in 2014. The SHMA covers a twenty year period, from 2011-2031.

The SHMA identifies:

- The overall scale of housing need, as well as the mix of housing and range of tenures which the local population is likely to need in the 20 year period to 2031.
- Household and population projections, taking account of migration and demographic change.
- The need for all types of housing, including affordable housing needs, and the needs of different groups in the community.

¹⁵ Paragraph 11

¹⁶ Paragraph 11

This information together identifies the ‘objectively assessed need’ (OAN) for each district within the ‘housing market area’. The objectively assessed need for new homes in Oxford over the plan period is much higher than what can be realistically delivered within its administrative boundaries. It was agreed by the other districts through the Growth Board that Oxford’s OAN couldn’t be met within Oxford, and an apportionment of Oxford’s unmet housing need was made.

The OAN Range for Oxford is 24,000 to 32,000 additional homes required for the period 2011 to 2031 or (1200 to 1600 per year). For the purposes of the apportionment, it was agreed that the City Council’s need should be taken as the mid-point (i.e. 28,000).

Figure 4: Future Housing Need – Oxfordshire Local Authorities, 2011-2031¹⁷

Housing Needed per Year (2011-31)	A. Demographic Base + Shortfall	B. To Support Committed Economic Growth	C. To Meet Affordable Housing Need in Full	D. Range: Housing Need per Year	E. Midpoint of Range
Cherwell	682	1142	1233	1090-1190	1140
Oxford	780	700	2058	1200 - 1600	1400
South Oxfordshire	552	749	965	725-825	775
Vale of White Horse	508	1028	683	1028	1028
West Oxfordshire	541	661	685	635-685	660
Oxfordshire	3063	4280	5624	4678 - 5328	5003

Source: Oxfordshire Strategic Housing Market Assessment Summary – Key Findings on Housing Need, March 2014, p24

The Oxfordshire Growth Board published a Draft Advice Note on Oxford’s Development Capacity in August 2015. In this document they suggested there was an unmet need of 17,632 homes within Oxford. Including a windfall of 400dpa for the Local Plan Period, there would be an additional supply of 1,100 dwellings. This would ultimately lead to an unmet need of 16,532 dwellings. Figure 5 below sets out the annual and twenty year planned housing supply as it was understood in 2015.

¹⁷ Oxfordshire Strategic Housing Market Assessment Summary – Key Findings on Housing Need (March 2014, p24)

Figure 5: Planned Housing Supply (2011-2031)

Planned Housing Supply (2011 – 2031)

Authority	Housing Supply Per Year	Housing Supply 2011-2031	Amount above or below SHMA 20 year midpoint
Cherwell (Inspectors Report)	1,140	22,840	+ 40
Oxford (SHLAA 2014 + Response to Cundall May 2015)	518	10,368	- 17,632
South Oxfordshire (Refined Options Consultation April 2015)	900	18,000*	+ 2,500
Vale of White Horse (Local Plan Submission May 2015)	1,028	20,560	0
West Oxfordshire (Local Plan Pre Submission March 2015)	525	10,500**	- 2,700
Oxfordshire	4,111	82,268	- 17,792

*Assumes 3,000 dwellings towards Oxford's unmet housing needs - the actual figure for South Oxfordshire's contribution will be derived through the Post SHMA process

**housing supply figure reflects more recent analysis from WODC showing the level of need in West Oxfordshire is lower than that indicated in the SHMA - this point will be tested at Examination..

Source: *Oxfordshire Growth Board, 2015*¹⁸

CONCLUSION

This background paper has detailed the numerous ways in which potential housing sites have been identified and how further sites are to be identified and delivered through the Local Plan policies. Although it is recognised that despite these efforts the OAN figure cannot be met within Oxford's administrative boundaries, the City Council will ensure that all will be done to achieve the maximum number of dwellings within the City. Alternatively, those unable to be delivered within the City will be met by the four neighbouring authorities through the 'duty to cooperate'. Overall, it can be confirmed through this background paper that no stone has been left unturned in identifying potential sites for housing.

¹⁸ <https://www.oxfordshiregrowthboard.org/wp-content/uploads/2018/04/UpdatedadvicenoteOxfordHousingCapacity.pdf>