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**Oxford City Council response to
Inspectors' Matters and Issues**

Matter 2

*Housing
capacity in
Oxford*

November 2019

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Matter 2: Housing capacity in Oxford

Whether the policies of the Plan adequately promote housing delivery, and whether the Plan provides an adequate basis for ensuring that the best use would be made of land within Oxford to maximise housing provision.

Whether the capacity-based housing requirement for Oxford of 10,884 (544 dwellings per annum over 20 years) set out in OCC1.B is realistic

Whether the Housing and Employment Land Availability Assessment (HELAA) is a reliable indication of the capacity of the city for housing and whether greater clarity is required for the numbers to be provided on housing sites and mixed-use sites.

Key question 1: Whether the policies of the Plan adequately promote housing delivery, and whether the Plan provides an adequate basis for ensuring that the best use would be made of land within Oxford to maximise housing provision.

Introduction

- 2.1. 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 City Council has taken a thorough and comprehensive approach to identifying sites for potential housing development. This approach is set out in background papers BGP3: Assessing and Meeting Housing Need and BGP20: Site Audit. In drafting the policies in the Plan we have ensured that they enable the most efficient use of land to maximise housing provision and promote delivery within the city's tight administrative boundary. Paragraphs 33-39 of BGP.3: Assessing and Meeting Housing Need explain the process undertaken to assess the suitability of the sites and why they were selected (or not) to be taken forward as an allocation in the Plan.
- 2.2. The Housing and Employment Land Availability Assessment (HELAA) provides a comprehensive assessment of Oxford's capacity of housing and employment land. The HELAA does not allocate land for residential development but identifies sites with development potential. More details about the role of the HELAA and its reliability in identifying Oxford's capacity is set out in our response to Key question 3 of this statement.

The approach taken in the Plan to identifying sites for housing

- 2.3. The efficient use of scarce land resources is vital if Oxford's sustainable growth and development is to be ensured. The Plan requires development proposals to make the best and most efficient use of land, which continues Oxford's record of recycling land (Policies E1 and RE2). We have taken the approach of 'leaving no stone unturned' to find sites suitable for development to meet the needs of Oxford. Potential sites were identified through a wide range of methods and sources, as listed in paragraph 32 of BGP.3. This included call for sites exercises, desktop map searches, looking at previously identified sites and looking at all open spaces. All potential sites identified were included in the initial sift and a three stage filtering process was followed to identify which of these potential sites should be taken forward for further consideration. The stage 1 assessment excluded sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. The stage 2 assessment assessed sites against Sustainability Appraisal objectives and the stage 3 assessment assessed sites against the Local Plan Preferred options Strategy and deliverability considerations. The outcome of these processes is shown in BGP.20: Sites Audit. To ensure 'no stone is left unturned' in the search for housing sites a reassessment has taken place of all greenfield sites in the city. In addition, the release of Green Belt land has also been considered.

Greenfield sites

- 2.4. Oxford benefits from a wide variety of green spaces that are not only valued by local people, but perform important social, economic and environmental functions. From the early stages of development of the Plan the City Council decided to reassess green spaces in the city, rather than carrying forward existing protections. Policy G1 protects the Green and Blue Infrastructure network. The policy, and the sites identified, has been informed by the Oxford Green Infrastructure Study and its appendix 3 (GRS.8 & GRS.8). This identified Oxford's green spaces with an area of 1000m² or greater and assessed their social, environmental and economic functions. It notes sites that are sports pitches, Green Belt etc. Sites protected under this policy are considered to be multi-functional spaces that are valuable and important in situ. Other spaces are protected if they are allotments, or sport and recreation sites. If spaces are located outside of the Green Infrastructure Network and have been put forward by a landowner, and where appropriate and necessary compensation is considered to be possible, these greenfield sites have been allocated for development. Appendix 2: Table 2 of BGP.20: Sites Audit sets out the process by which sites were considered and taken forward for a site allocation.

Green Belt

- 2.5. Through a Green Belt review eight sites have been identified for release from the Green Belt. These sites were assessed through the Oxford Green Belt Study and its Addendum (GRS.1 & GRS.2) which forms part of the evidence base for the OLP2036. The justification behind the release of Green Belt land is set out in Background paper 11 (BCP.11) Green Belt Review and summarised in Matter 3.

Striking the right balance between housing and other land uses

- 2.6. The Plan reflects the capacity and availability of land/sites in the city, recognises the need to provide for a mix of homes to support the growth of sustainable communities whilst ensuring that the need to provide land for other essential uses, such as employment, retail, health and education, community and leisure facilities. The Plan has sought to ensure sufficient land is available to meet the retail, health and education requirement during the Plan period.

Education

- 2.7. Whilst preparing the Plan, City Council officers have met with officers from Oxfordshire County Council to discuss educational requirements for the city. The requirement for an additional secondary school is being provided by the recently opened Swan School (opened to students in September 2019). The students are accommodated currently in temporary buildings at Cherwell School, with the new school in Marston being under construction. It is anticipated by the County Council that additional need for primary school places will be met by extensions of existing schools. The City of Oxford College has two campuses in the city, in the city centre and at Blackbird Leys. They have no intentions to expand their facilities during the Plan period.

Health

- 2.8. City Council officers met with the Clinical Commissioning Group (CCG) and surveyed GPs across the city. The CCG produced a localities plan for Oxford city which found that there was a need for premises development in Summertown and the city centre. However, according to the localities plan¹ (updated 2019) capital funding has yet to be secured for either of these projects.
- 2.9. The John Radcliffe Hospital Site (JR) is a major strategic site within the Plan and plays an important role as a local and regional clinical facility, a research facility and a key employment site. Policy SP42 (refer to Matter 6) has been drafted to ensure that the

¹ Oxford City Locality Place based Primary Care Plan (Refresh March 2019):
<https://www.oxfordshireccg.nhs.uk/documents/work%20programmes/locality-plans/Locality-Plan-Refresh/Oxford-City-Locality-Plan-Refresh.pdf>

JR's needs are reflected but also balanced against the wider needs of the city; ensuring sufficient flexibility for this hospital to adapt and change as its operational needs adjust over time in the context of the development needs of the City as a whole over the plan period. We understand that Oxford University Hospitals NHS Foundation Trust are beginning work now on a masterplan for their three hospital sites (The Churchill and the Nuffield Orthopedic Hospital) to consider comprehensively how to meet their own operational needs within its own estate.

Retail

- 2.10. We commissioned a retail and leisure study (RTL.1) which outlines future retail and leisure requirements during the Plan period. The overarching conclusion of this study is that the Westgate effectively 'soaks up' all surplus capacity for comparison goods floorspace across the City Council area so that there is no need for additional allocations for comparison retail, although existing floorspace should be protected. The scenario is similar for convenience shopping, although with the need for some additional capacity forecast towards the end of the Plan period, which it is anticipated can be met within existing centres. The leisure needs/gap assessment found that there is potential to improve and strengthen the leisure offer in the main centres, particularly in terms of qualitative improvements, but there is limited scope for new commercial facilities. Therefore the plan does not seek additional land for any of these uses.

Employment

- 2.11. The NPPF (paragraphs 80-82) in relation to the economy focuses on the requirement for 'planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'. The NPPF goes on to highlight the importance of 'building on its economic strengths, driving innovation and capitalising on their performance and potential'. This needs, however, to be considered alongside the need to plan for housing and supporting infrastructure. The Framework states the need for flexibility and the specific locational requirements of different sectors.
- 2.12. The Plan sets out a balanced approach in planning for the employment needs of the city whilst recognising the need to optimise land for housing. The approach that is proposed in the Plan is one which seeks increased flexibility in managing economic growth and prioritising the uses on sites, hence more flexibility towards the possible uses than has been adopted previously in the Core Strategy. The overall approach is to allocate not new land for employment, and to ensure existing employment sites are used in the most efficient way, with the potential for housing on all employment sites through Policy E1.

- 2.13. The Plan's approach to employment and the economy has been assessed through the Sustainability Appraisal and Strategic Environmental Assessment (CSD.5). Early discussions about the Local Plan considered whether to focus on new housing, new employment or both. This was due to Oxford's pressure for development, combined with existing environmental and physical constraints. The preferred option has been to focus on housing growth, while resisting the loss of important employment sites. This is most likely to lessen the barriers to economic growth and help to lessen the need for in-commuting as more people can live within the city nearer their work. . The Preferred Options document included options to not protect employment land. As noted in the Sustainability Appraisal (CSD.5) 'It is widely recognized that the shortage of housing in Oxford is a barrier to economic growth. However, the Oxford Employment Land Assessment (2016) also identifies the need to provide for additional employment development to meet the forecast demand to 2036. Coupled with the huge housing need, this presents a challenge for this Local Plan. Oxford needs to find an approach so that the barriers to economic growth (e.g. shortage of housing) and the drivers of economic growth (e.g. employment growth) can both be addressed appropriately and without detriment to one another. The SA considered that allowing residential use on category 1 sites, whilst it could potentially deliver more housing, could also erode Oxford's supply of employment land and reduce opportunities for economic growth of these key businesses and sectors. Protecting the employment use of Category 2 sites was also the preferred option for the same reason.
- 2.14. Recognising the need for flexibility, the Plan has adopted a hierarchical approach to employment sites Policy E1 (Employment sites) categorises employment sites in Oxford. Category 1 sites are those that are nationally and regionally important to the knowledge economy or are significant employers or sectors within the city, which comprise primarily B1 (office) and B2 (industrial) uses with some B8 (warehouse) uses. Many of these are large sites comprising hospital and university research sites, hi-tech manufacturing, bio-engineering companies and the BMW Mini plant. Category 2 sites provide local services and often include a mix of B1 and B2 uses. These sites have been assessed in the Employment Land Assessment against set criteria and identified as performing well and having long-term potential for employment uses. They provide a valuable employment contribution and important supporting infrastructure for the larger employment uses in Oxford. Category 3 sites mainly comprise smaller sites and those not performing as well as Category 2 sites. The policy is criteria-based which recognises their importance in the hierarchy of employment land and their need to be safeguarded against their loss.
- 2.15. New proposals for B8 uses are not to be supported unless essential in supporting a Category 1 site. This is because these uses require large amounts of land usually with a

low jobs ratio to land area. Given the limited land available and thus competing demands on this land, combined with the constrained transport network in the city, we consider that there are more accessible locations that could be utilised for B8 uses outside of the city's boundary. More details as to the Plan's approach to employment can be found in BGP.6 Economy.

Housing omission sites

- 2.16. The small number of housing omission sites put forward at Regulation 19 stage suggests that the process to identify sites for housing and account for them in the housing capacity figure has been thorough. The 16 sites considered housing omission sites are set out in Appendix 2.1 with a commentary as to how they have been dealt with through the site selection process. Five of these sites have been included in the trajectory and therefore contribute to the total capacity figure informing Policy H1, as modified. A site allocation is not considered necessary for these sites. Two sites were rejected because of the impact they would have on the Green Belt if developed, two were rejected because of the likely level of harm their development would cause to heritage assets, two were rejected because they are in flood zone 3b (without a built footprint) and two sites were rejected because they would result in a loss of facilities with insufficient information provided about level of need or potential replacement. One site was too small for an allocation and could come forward as a windfall site, one site lacks landowner interest and one site was proposed only for student accommodation in a location that would be contrary to Policy H8.
- 2.17. We are satisfied that all sites that have been identified as deliverable and developable sites are included in the Housing and Employment Land Availability Assessment (HELAA) main report PSD.2 (March 2019). Appendix A of the HELAA includes all of the sites assessed taking into account their availability, suitability and likely economic viability. This has been undertaken in accordance with paragraph 67 of the Framework and the Planning Practice Guidance. Those sites considered to be deliverable within the Plan period are listed in HELAA Appendix B with their respective site capacity figures.

How the Plan secures efficient use of land and maximises yield

- 2.18. The NPPF paragraph 117 emphasises that 'planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'. Using scarce resources efficiently is vital to ensuring Oxford's sustainable

growth and development. Oxford natural constraints, Green Belt land and its growing population makes the need for the efficient use of land of paramount importance. The Framework goes on to state at paragraph 122 that planning policies ought to take into account ‘the identified needs of housing...’ and at paragraph 123 ‘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’.

Density

- 2.19. Policy RE2: Efficient use of land of seeks to ensure that development proposals make efficient use of land. The policy RE2 includes a minimum density standard for the city and district centres, as required by the NPPF. The density assumptions in RE2 are based upon the Housing and Economic Land Availability Assessment (HELAA) PSD.2 are set out in paragraphs 2.2.5-2.2.12 and also BGP.7 paragraphs 8-20. Background paper BGP.7 Efficient Use of Land should be read in conjunction with this policy as it provides the background to both the existing policy framework and Policy RE2.
- 2.20. In terms of the methodology used in the HELAA, four typologies of development were identified and informed using the professional expertise of council officers in the Urban Design and Heritage team and the Planning Policy team. These were set out as ‘District Centre’, ‘Gateway site’, ‘Suburban site’ and ‘Conservation area’. Definitions of each of these are set out in paragraphs 10 – 13 of the background paper. To inform the density bandings of each of these typologies, officers used density figures from proposed and forthcoming developments and applications in the city along with data from the Consumer Research Centre. Further detail on the process is provided in the background paper (BGP.7) and later in this matter statement.
- 2.21. The final density bandings were set out for the purpose of estimating housing capacity numbers in the HELAA, where the lowest figure in each density banding was utilised as a multiplier for the available land that had been allocated in the prospective development typology. The lower end of the banding was used when assessing capacities in the HELAA to ensure that Oxford maintains its five-year housing land supply and sets an achievable capacity. The capacity calculations have been made with best available information for plan-making purposes but have not been stated in policy. This point is explained in more depth later in this statement.

Building Heights

- 2.22. The scarcity of land in Oxford means that there is an imperative to use land efficiently. Taller buildings may positively contribute to increasing density, enabling a more efficient use of land. They may also contribute to place making and the design of development. It is essential that design choices about building heights are informed by

an understanding of the site context and the impacts on the significance of Oxford's historic skyline, including views into it, views within and views out.

- 2.23. Policy DH2 concerns views and building heights. The policy focuses on these considerations giving strong evidence on how they will be considered. The policy is informed by a thorough evidence base (the High Buildings Study Technical Advice Note (TAN) (DES.1) and the High Buildings Study Evidence Base Report (DES.2)) that has given full regard to the potential impacts of taller buildings on setting. The TAN provides a toolkit to identify appropriate heights, assess the impact of high buildings and design them appropriately. Policy DH2 says that, within a 1,200m radius of Carfax tower developments that exceed 18.2m are likely to intrude into the skyline, so extreme care must be taken and specific criteria are included in the Policy. The policy does not, however, set any height limit and does not include any height restrictions beyond the Historic Core Area. The importance of the protection of the skyline and other heritage concerns within the city are likely to limit the instances that high buildings are appropriate. The TAN enables this to be explored.

Flood risk management

- 2.24. The approach of the Local Plan Policy RE3 is to allow very careful re-development of existing brownfield sites in Flood Zone 3b. This provides the opportunity to deliver further housing within Oxford whilst potentially improving the flood risk situation. We have signed a Statement of Common Ground (COM.4) with the Environment Agency which has introduced proposed wording to achieve safe access and/or egress to satisfy the Exception Test. Our response to Q5 paragraph 5.3 of the Inspector's second set of questions IC.2 sets out the details about housing capacities which have changed which has resulted in a net increase of housing capacity of 33 units.

Parking

- 2.25. Limiting parking opportunities within the city results in available land being used more efficiently. For example car free housing developments offer the opportunity for a higher density development to be delivered on sites where parking would otherwise be present.
- 2.26. Overall, we consider that the policies of the Plan adequately promote housing delivery and that the Plan provides an adequate basis for ensuring that the best use would be made of land within Oxford to maximise housing provision. The Plan's policies have been positively prepared, are justified, effective and consistent with national policy and therefore sound.

Key question 2: Whether the capacity-based housing requirement for Oxford of 10,884 (544 dwellings per annum over 20 years) set out in OCC1.B is realistic

Introduction

2.27. Oxford City Council considers that the rigorous process undertaken in preparing the evidence base for the Plan and more specifically the preparation of and updates to the Housing and Employment Land Availability Assessment (HELAA) demonstrates that the capacity-based housing requirement for Oxford of 10,884 is realistic. This has been confirmed by independent peer reviews about Oxford's housing capacity outlined below.

Setting the housing capacity based target in the Plan and the role of the HELAA

2.28. The housing capacity that informed the housing requirement of 8,620 included in Policy H1 of the submission Oxford Local Plan 2036 (the Plan) was based on the HELAA 2017 (HOU.1). However, during the Plan's preparation, owing to both updates received from landowners and the rapidly changing landscape of government guidance relevant to calculating housing supply and delivery: updates to the NPPF and PPG, the introduction of the standard methodology for calculating housing need and the housing delivery test, it was apparent that some alterations to the approach in the 2017 HELAA would be required. In particular, amendments were required to windfall rate forecasts, the ratio applied to student accommodation, and the assessment of deliverability. As such, the updated HELAA and trajectory (PSD.2 to 5) were submitted to the Inspectors in May 2019.

2.29. Our response to IC.1 Q3 Ascertaining Development Capacity is set out in OCC.1C and details the process that we undertook in ensuring the most up to date information was recorded in the HELAA. Both documents provide estimated housing figures for all sites within the trajectory and delivery timescales. The City Council is satisfied with the robust exercise undertaken to update both the HELAA and the trajectory, which ensures that all completions, commitments and windfalls are included in the final capacity figure for Oxford. The note to accompany the updated trajectory (PSD.3) sets out the reasons for the change in the proposed housing target from the submission version of the Plan, which are largely related to a change in the windfall calculation and the application of national ratios for student accommodation and other communal accommodation to reflect the approach in the Housing Delivery Test rulebook. The housing capacity figure is a total housing figure including care homes, affordable and market housing, employer-linked housing and student accommodation (with relevant ratios applied in order to convert expected numbers of rooms to the equivalent dwelling number).

- 2.30. Table 2.1 provides the breakdown of sources of supply over the Plan period 2016-2036 (net number of homes) which is set out below for clarity.

Completions (2016-2019)	1160
Commitments (extant permissions, not yet completed)	303
Total dwellings from site allocations and trajectory sites	8354
C2 (student accommodation)	(1840)
C3	(6514)
Total supply	11,721
Total Supply over Plan Period* (minus 10% buffer)	10,884

* This includes the 10% discount for non-delivery of future anticipated supply on large sites in Policy H1 (explained at paragraph 3.9 of the Plan and in BGP.3).

Table 2.1: Sources of supply over the plan period:2016-2036 (net number of homes)

- 2.31. The HELAA 2019 (PSD.2, paragraphs 2.25-2.2.10) and ‘Efficient Use of Land’ background paper (BGP.7) set out how density multipliers suitable for different site typologies have been identified and applied. Appropriate densities for each typology were informed by density figures from proposed and forthcoming developments and applications in the city, data from the Consumer Data Research Centre (sourced from ONS/NRS/NISRA), and vetting by the professional expertise of City Council officers. The data collected relevant to the Oxford context was combined with detailed work, research, and case studies identified through a review of best practice literature, ensuring the figures assembled from within Oxford were considered in terms of their relative consistency and accuracy with other development patterns elsewhere. The external case studies used as a check are shown in Table 2 of BGP.7. This shows the density of a selection of schemes against their typology. The densities achieved are in line with the typologies chosen. The conservation areas achieved a higher density than the conservation area typology applied in Oxford, but the particular examples are urban sites and the conservation area typology applied in Oxford is consistent with densities achieved in the historic village conservation areas of Oxford.
- 2.32. Appendix B of the HELAA (PSD.2) shows how consideration has been given to constraints on each site identified, and how the site area has been adjusted to a developable area to account for these. For some sites which are mixed use brownfield sites, have different operational demands upon the land for example the John Radcliffe site. This has made it challenging to estimate capacity (refer to Matter 6 for more detail).

- 2.33. The relevant density typology has then been identified and applied to each site. However, where there is an existing planning application that is approved or considered by officers to be appropriate in density terms, or where a developer/landowner has done early work to draw up a scheme and identify appropriate numbers (and these are not dissimilar to those suggested by the density typology), these numbers have been used. The HELAA does make it clear that it is a list of potential sites only, not all of which will come forward, and that it does not in itself allocate sites. The HELAA does not contain policies so it is important it is read as a technical document, not as a document that is a guide to how planning applications will be considered. However, the HELAA and the housing trajectory submitted to the Inspectors on 7th June (PSD.4 and PSD.5) are intended to be used to ascertain the capacity of the city over the Plan period.
- 2.34. The HELAA provides a snapshot in time of landowner intentions, current national policy and information regarding sites constraints and viability. Every effort has been made to identify sites and to liaise with the landowner about their likely delivery, for example through call for sites exercises, landowner updates (including in Spring 2019), and formal and informal consultation processes, as set out in detail in response to Matter 4. The trajectory sets out credible housing and student housing numbers which have been achieved by extensive engagement with key stakeholders, as set out in the answer to Question 4 Ensuring Effectiveness (OCC.1D) and referenced in the BGP. 20 Sites Audit. 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. The housing trajectory (PSD.4 and 5) also includes an estimate for windfalls. It includes sites already completed and it includes commitments from small sites. In addition, it includes all the sites allocated in the Plan, as well as some other sites that were considered but which do not require an allocation, either because they have already commenced or are considered to not need a specific site policy to enable development to come forward on the site.

Relationship of housing target to unmet need

- 2.35. The post-SHMA work programme (2016) identified a working assumption that:
- 10,550 homes would be accommodated in Oxford; and
 - 14,300 homes would be accommodated by neighbouring authorities.
- 2.36. This left 3,150 homes unallocated. Policy H1 of the Local Plan identifies a capacity led housing requirement of 10,884 homes. This means this unallocated element is now 2,816 homes. Consequently, if the capacity on identified sites was to increase through detailed work at application stage this will go towards meeting this remaining need.

There is sufficient headroom to be confident that the working assumption for neighbouring authorities would not be affected. Particularly when considered against the reality that there is equal risk that there may be sites that either do not come forward or where the capacity assumed in the HELAA and trajectory reduce following more detailed work at application stage.

- 2.37. Not only have we undertaken a robust assessment of housing capacity, through updating the HELAA, our HELAA has been subject to high levels of scrutiny by neighbouring authorities through both the “Cundall’s Report” and the jointly commissioned “Fortismere Report” on Oxford’s capacity as detailed below. The HELAA identifies suitable sites that would, in other districts, be ruled out in principle – for example on sites at higher risk of flooding. The Council publishes a new version of its HELAA on an annual basis and runs an open call for sites to help identify any new suitable, available and achievable sites on a frequent basis. The Council is confident it has undertaken a robust assessment, consistent with national policy and made all reasonable attempts to identify its capacity based on a proportionate evidence base.

Independent peer reviews of Oxford’s housing capacity

- 2.38. Oxford City Council’s housing capacity assessment process has been independently reviewed, both in 2014 and 2015. In 2014, an independent peer review was prepared by Cundall, Johnston and Partners LLP entitled “Unlocking Oxford’s Development Potential” (HOU.16) (hereafter the “Cundall Report”) The Cundall Report was commissioned by South Oxfordshire District Council, the Vale of the White Horse District Council and Cherwell District Council. The purpose of the Cundall Report, according to its authors, was to “determine the realistic housing potential for potential development sites that can come forward within the administrative boundary of Oxford City Council”. The report not only focused on assessing sites and maximising the level of housing provision but also reviewed the Strategic Housing Land Availability Assessment (SHLAA) methodology against National Planning Policy as well as housing need capacity and land supply.
- 2.39. In 2015, the Growth Board appointed Fortismere Associates to act as a ‘critical friend’ for the Oxfordshire Post-SHMA Work Programme. The appointment included a review of the Oxford City SHLAA (2014) to satisfy partners that the assessment of the ability to meet the stated level of unmet housing need was correct.
- 2.40. The Fortismere Report (GDL.7) concluded that the SHLAA (2014) was compliant with government policy and guidance and made a number of recommendations for future SHLAA/ Call for Sites work. The first of which was for the City Council to undertake a Local Plan review. Oxford City Council commenced its Local Plan Review in 2016 with

an Issues Consultation over the summer months. The City Council reflected on the recommendations of both reports and ensured that the recommendations were reviewed and incorporated where appropriate.

- 2.41. Paragraph 5.10 of the Fortismere Report made four recommendations for Oxford City Council with regard to further assessment of housing capacity to make reasonable adjustments to existing policy whilst maintaining consistency with the NPPF.

Recommendation (a) Potential to redevelop employment sites for housing/ a mix of uses including housing

- 2.42. Appendix 2 of the Economy Background Paper (BGP.6) provides a methodology note which sets out the basis for the categorisation of employment sites in the Oxford Local Plan. Paragraph 2.5 of the Plan, sets out the hierarchical approach to the protection of employment sites. Housing is allowed on every category of site subject to the policy criteria set out and the flexibility changes with the level of category. The Employment Land Assessment (2018) (ECO.1) provides the evidential basis for this.

Recommendation (b): Oxford City should consider if there are potential sites that are a higher delivery risk but which have reasonable prospects of being delivered during the later years of the SHLAA which could be included in the housing capacity.

- 2.43. The HELAA (2019) (PSD.2) and Housing Trajectory (2019) (PSD.4) include sites that are more likely to come forward towards the end of the Plan period. This has been informed by information received from landowners about their intentions for the site and has been reflected in the HELAA and trajectory accordingly.

Recommendation (c): Identifying particular areas of the city where increased densities could be achieved

- 2.44. The Efficient Use of Land Background Paper (BGP.7) sets out the methodology for identifying the residential typologies that were used to establish the site densities in the HELAA. Paragraph 18 of BGP.7 sets out the HELAA capacity density bandings according to development typology. Policy RE2 required the maximisation of density (refer to paragraphs 2.17-18 for more details about density).

Recommendation (d): Potential to release open space, outdoor recreation and allotment provision by replacement provision in the Green Belt should be considered through a Local Plan Review and the Strategic Options Testing and Green Belt Study

- 2.45. We have reviewed all potential development sites through the HELAA process. The Plan itself proposes the allocation of certain underused open spaces and outdoor recreation land some of which are referred to in Matter 6. It also considered whether allotment land in the city had development potential. However, allotment sites were not considered either suitable or justified as development sites.

2.46. Given the above, it is clear that Oxford City Council has complied with the recommendations as set out in the Fortismere Report as to how to make reasonable adjustments to existing policy whilst maintaining consistency with the NPPF.

2.47. It is worth noting that several other recommendations were in the Fortismere Report regarding future SHLAA/ Call for Sites. These are set out at Paragraphs 5.13-5.16 of the Report.

Paragraph 5.13: recommends the production of a joint (HMA-wide) HELAA

2.48. The City Council is not in a position to produce such a piece of work alone. With the forthcoming Oxfordshire Plan 2050 – the joint statutory plan for Oxfordshire – this brings the possibility of such work being undertaken jointly between the Oxfordshire authorities however such a capacity assessment would need the agreement of all partners.

Paragraph 5.14: recommends Oxford City should consider expanding the consultation database to include wider stakeholders for Call for Sites exercises

2.49. Throughout the Local Plan process (since its inception in 2016), we have used an expanded consultation database for its specific Call for Sites exercises. However the call for sites has remained open and landowners have been able to submit sites at any time. Paragraph 2.1.45 of the HELAA (2019) (PSD.2) states:

During March and April 2016 the City Council undertook a “call for sites” requesting any new sites or updates to previously-considered sites. This involved contacting all the major landowners, planning agents, public bodies, large institutions and registered providers known to the City Council.”

Paragraph 5.15 suggests that Future Call for Sites should be clearer about what the authorities consider to be a constraint

2.50. Oxford City Council considers that our Call for Sites methodology is more open and less restrictive than the approach put forward in the Fortismere Report. The Call for Sites form asks the person submitting the site to indicate the constraints that they consider to be present. The City Council then considers each site against the HELAA methodology. The HELAA methodology is clear about what is considered a constraint in first filter but is an iterative process.

Paragraph 5.16 suggests Oxford City should encourage landowners to use its website for submission of Call for Sites forms on an on-going basis

2.51. The City Council has done this throughout the Local Plan process and the opportunity to put forward sites remains open².

² [Oxford City Council Call for sites webpage](#)

2.52. The HELAA (2019) followed the methodology of previous HELAAs and was undertaken in accordance with the NPPF and PPG. The 2019 HELAA shows Oxford’s development capacity to be 11,721 as set out in Table 2.1 above. Table 2.2 shows how this capacity compares with the capacity analysis provided by the two peer-review reports – Cundall and Fortismere.

Report	Cundall Report (2014)	Fortismere Report (2015)	Oxford City Council HELAA (2019)
Development capacity of Oxford	11,664	10,368 + 1,100 (response to Cundall Report) 11,468	11,721
Oxford’s Housing Requirement*			10,884

*-10% non-delivery discount for allocations

Table 2.2 Development Capacity Analysis comparing Peer Review Reports with Oxford City Council HELAA (2019)

2.53. Both the peer reviews (Cundall and Fortismere Reports) confirm the robustness of the approach taken in Oxford City’s HELAA assessment and the assessed capacity used for the purposes of the preparation of the plan. They do not identify a significantly different capacity. As set out in the section above about the relationship of our housing target to unmet needs, there are circa 3,000 additional homes needed within Oxford that has not been allocated to be met by our neighbouring authorities. Therefore, a further 3,000 homes would need to be found in Oxford before it would have any bearing on the working assumptions of the unmet needs assumed to be met by neighbouring authorities.

2.54. The Cundall Report reviewed a total of 421 sites and considered that 138 had development potential. The 138 sites were then assessed using a “traffic light” system. Chapter 4 of the Fortismere Report reviewed the approach taken in the SHLAA (2014) to a number of sites identified in the Cundall Report. The sites were selected “through the review of documents and meetings with the local authorities”. Appendix 2.2 provides a summary of the sites reviewed in Chapter 4 of the Fortismere Report and provides a peer review of each site setting out how they have been assessed in the City Council’s HELAA. The conclusions arrived at in the previous paragraph were informed by the undertaking of the peer review of the twelve agreed sites.

Key question 3: Whether the Housing and Employment Land Availability Assessment (HELAA) is a reliable indication of the capacity of the city for housing and whether greater clarity is required for the numbers to be provided on housing sites and mixed-use sites.

Introduction

2.55. We are satisfied that the rigorous process we have undertaken in preparing the HELAA ensures that it is a reliable indication of the capacity of the city and has been prepared in accordance with Paragraph 67 of the NPPF and the Planning Practice Guidance Note Paragraph: 001 Reference ID: 3-001-20190722. Much of our answer to this question about the HELAA's reliability has been referenced in our earlier responses in this matter and our response to this question involves signposting the Inspector to earlier references. In addition the response above about the high level of scrutiny that Oxford's capacity has been subject to add further reassurance that the capacity the HELAA provides a reliable housing capacity figure for Oxford.

Reliability of the HELAA in establishing Oxford's capacity

2.56. Appendix B of the HELAA provides the site capacities for each site. The decisions we have made about the appropriate mix of uses on each site has been reached based on planning judgment, balanced against the landowner's aspirations alongside an assessment of what uses are appropriate on the site based upon the Plan's strategy and the Sustainability Appraisal and Strategic Environmental Assessment (CSD.5). On sites where landowners have not provided any information about capacity we have assessed the density using the density calculations outlined in BGP.7 Efficient Use of Land. This density calculation has been used to inform Table B of the HELAA site capacity tables (March 2019) (PSD2). Detailed information about delivery of development on the sites is set out in Matter 4.

Assessment of sites' capacity

2.57. Chapter 9 of the Plan sets out the specific policy allocations for sites included in the trajectory. We have intentionally not assigned a specific housing requirement number within the site policies. Sites in Oxford are generally complex sites. They are usually brownfield sites, which may be being only partially developed or redeveloped. Existing capacity must be taken into account. There are frequently constraints such as heritage considerations and flood risk. As such there are many factors that will influence the capacity. We have addressed this point in our response to Q3:Ascertaining development capacity OCC.1C (paragraph 3.4).

2.58. At Plan preparation stage it is appropriate to reach best understanding with the landowner about likely mix of uses, consider the Plan's strategy and policy, consider constraints and apply a typology. This will result in an appropriate assumption about capacity to inform plan making. However, at the planning application stage, as designs

begin to be drawn up, this greater level of site-specific detail may result in a different capacity than that assumed in the HELAA. Ascribing a number to each site could have the detrimental impact of acting as an implied ceiling and limiting the optimisation of yield on the site, conflicting with Policy RE2 Efficient use of land. This would act to reduce the flexibility of the plan and potentially act as a constraint to maximizing yields.

- 2.59. OCC.1C, gives further detail about how the capacity of mixed-use sites has been considered (paragraph 3.13). This notes that 17 sites in the housing trajectory are mixed-use sites, and that all of these sites are brownfield sites. Predicting the amount of housing likely to come forward on these sites has been done in consultation with the developer/landowner to ascertain their future ambitions for these sites, or it is based on a current application. Sometimes the landowner's own understanding of the likely balance of uses, taking account of their ongoing operational needs, are not yet clear. A planning judgement has been applied to ensure that the proposed mix of uses and yields are reasonable based on the evidence available. The mixed-use sites are listed in Table 3 of OCC.1C, which notes how the housing capacity assumptions included in the trajectory were reached.

How policies of the Plan adequately promote and maximise opportunities for housing delivery

- 2.60. The City Council is satisfied that the policies of the Plan adequately promote and maximise the opportunities for housing delivery. The policy approach has been reflected in the capacity calculations in the HELAA, which have informed the overall housing requirement. We do not consider it necessary or justified to have individual site housing requirement numbers as detailed in OCC.1C - Ascertain Development Capacity. We consider this would act to reduce the effectiveness of the plan as a whole and in particular the effectiveness of RE2 in maximising development yield. Specific yields should be identified at the planning application stage once a complete evidence base for each individual site has been developed in a way that demonstrates the maximum amount of development that each site can reasonably accommodate in the light of the constraints and sensitivities of the site. Full details as to how sites were identified and assessed is described in BGP.3. We would re-iterate that these must be read in conjunction with BGP 7 Efficient use of land and BGP 20 Sites Audit.

Appendix 2.1: Omission Sites

Reference no.	Site Name	Reason for omission	Summary
206	Northern Gateway	Concerns that the site is not allocated in the local plan. The site is allocated through the Northern Gateway AAP. The AAP remains extant and part of the development plan. Therefore, the Local Plan does not need a policy allocation. However, the site is included in the housing trajectory.	Included in housing trajectory. Covered by AAP.
351	Brasenose College Land at Marston	This area was assessed in the Green Belt Study because of the landowner interest in the site and because of there being no other constraints such as GI or a biodiversity designation. It found development of 112c1 would have a moderate high impact and 112c2 a high impact (see GRS.1, which uses these reference numbers from the HELAA). Parcels where development would have a moderate-high or high impact on the integrity of the Green Belt and its protection of Oxford's setting are not proposed for development.	Site not considered suitable for development because of impact on Green Belt.
1690	Brasenose College recreation ground	Brasenose and Queens College Sports Ground is considered in the HELAA as site 179. All of the site is in Flood Zone 3 66% is in Flood Zone 3b. The site was also assessed as being part of the GI network (GRS.8). For these reasons the site was not progressed in the HELAA or taken forward as a site allocation.	Site not considered suitable for development as GI network and Flood zone 3b greenfield.
498	263 Iffley Road (Gladiator Club)	The site has not been submitted previously through the call for sites but was put forward at Regulation 19 stage for student accommodation. Policy H8 would not allow for new student	Would not require allocation for housing

Reference no.	Site Name	Reason for omission	Summary
		<p>accommodation on the site. This is to prevent the spread of student accommodation along arterial roads, where it is often already highly concentrated. Therefore, an allocation of the site for student accommodation would not be supported. The site is not required in order for the universities to reach their threshold targets set in Policy H9. Redevelopment of the site for residential accommodation would not require a specific policy allocation for the site, although general policies of the Plan such as V7 would need to be carefully considered in preparing a scheme and in the determination of a planning application on this site.</p>	<p>development, although community use may need to be re-provided. Not included in housing trajectory because it was put forward for student accommodation, which is not considered a suitable use in this location.</p>
611	Banbury Road/ Norham Gardens Wycliffe Hall Sites	<p>The site has not been submitted previously through the call for sites. The site is a sensitive site, being in a conservation area, containing listed buildings on the western frontage along Banbury Road, with a green treed area extending south of these buildings, which is part of the setting of the listed buildings. The less sensitive part of the site on the north part of the Norham Gardens frontage would not alone be large enough for a site allocation. There is at this point no evidence that the suggested development of the site as put forward by the landowner would be acceptable so it is not considered that the site is suitable for an allocation. The potential for the less sensitive parts of the site to accommodate development can be explored through the planning application process and does not need a site allocation.</p>	<p>Site not included in the housing trajectory because there is not enough information to suggest it is developable, beyond a small part (below the site threshold) that is the less sensitive part of the site that could come forward as windfall development.</p>

Reference no.	Site Name	Reason for omission	Summary
736	281 Abingdon Road Car park of former Fox and Hounds	The site is in Flood Zone 3b and is mainly surface-level car park (car wash), so without a built footprint. The site is also below the size threshold for inclusion in the Plan or HELAA.	Not considered further because it is flood zone 3b without a built footprint.
783	Crescent Hall	The City Council a small MUGA set within the curtilage of the Crescent Hall student accommodation site. The site was not progressed in the HELAA because Oxford Brookes have previously indicated that they no longer intended to develop the site within the Plan period (they were referring to the redevelopment of the existing halls of residence, which at one point were in the estates programme for potential redevelopment, but which are now in the programme for potential refurbishment only). Previously (in the Sites and Housing Plan) the site including the existing halls of residence and MUGA was allocated to allow a potential change to residential accommodation or complete redevelopment of the student accommodation, which it no longer appears is intended. There is no need to have an allocation policy to redevelop the student accommodation on the site or to develop student accommodation in the MUGA, which is experienced as being within the curtilage of the site. Even if development were to include a change to residential, policy would not prevent this if the student accommodation provision was to be replaced elsewhere. The site is not allocated in the Local Plan but has been included in the Housing trajectory.	Site included in the housing trajectory.

Reference no.	Site Name	Reason for omission	Summary
161	Southfield Golf Course	<p>The site has previously been considered for allocation (in the Core Strategy). Some of the site has an important hydrological link to the Lye Valley SSSI which means that development would not be possible without a negative impact on the SSSI. The landowner of the least sensitive part of the site, which might have potential to be developed, has stated that they have no intention of developing the site over the Plan period. Furthermore, the site is in use as a golf course and on the evidence presently available there would be a need to relocate this facility elsewhere, were development to be considered, consistent with the NPPF. No potential solution for replacement of the facilities has been suggested by the landowner, since at the current time they are not interested in developing the site. Therefore, the site is not deliverable and should not be allocated.</p>	<p>Site not allocated or included in the housing trajectory/HELAA because of lack of landowner interest</p>
854	Hill View Farm (unallocated part, SP26 is allocated)	<p>The whole of the Hill View Farm site was considered in the Oxford Green Belt Study (LUC, 2017). The site was assessed as two parcels, defined according to the methodology set out in the Study. The conclusion in relation to Site 112a-2 was that: <i>“Expansion of Marston this far west would significantly compromise the openness of the Cherwell Valley, to the detriment of settlement separation, countryside character and the historic setting of Oxford. It would relate badly to the existing settlement form, and would therefore constitute urban sprawl. Release of just the easternmost field would not have significantly less impact on Green Belt purposes.”</i> Site 112a- 1 was assessed as having a likely lesser impact on the Green Belt if allocated, and was allocated as SP26.</p>	<p>Not allocated or included in the housing trajectory/HELAA because of impact on the Green Belt.</p>

Reference no.	Site Name	Reason for omission	Summary
1211	Carpenter's Yard, Jack Straw's Lane	It is not considered that this site should be allocated in the OLP . In the event that the site were to come forward for redevelopment it could be assessed against the emerging policies in the OLP particularly with regard to Policy E1. The site was assessed as a Category 3 employment site in the employment land assessment and any loss of employment uses on the site would be assessed against the criteria in Policy E1. As such there is nothing to prevent this site coming forward for development as a windfall. No allocation is necessary.	No allocation is considered necessary. The site has been included in the housing trajectory.
1240	Former Bartlemas Nursery School	The Bartlemas Nursery School site was assessed by the City Council's design and heritage team. The small site and in particular its sensitivity in terms of the conservation area mean that there is only likely to be potential (depending on the specifics of the design) for a limited number of units, which means the site is too small for an allocation. That would not prevent the site coming forward as windfall site.	The site is not considered to need an allocation. It is included in the housing trajectory.
1241	Bartlemas Close Allotments	The allotment site remains in active use as allotments, which are protected according to Policy G4. The landowner has not suggested that there is a means to maintain the level of plots with alternative provision so the site has not been allocated for development.	Site not allocated due to lack of information about potential to replace allotments.
1242	East Oxford Bowls Club	The site is 0.3ha, so borderline size for being allocated or included in the HELAA (the threshold was set at 0.25). Bowls is not included in the new Playing Pitch Study as it is not included in the NPPF definition or Sport England's guidance as a defined	The site is not allocated as there is not enough information about

Reference no.	Site Name	Reason for omission	Summary
		<p>playing field. However, the site would still be protected under the NPPF.</p> <p>The site could come forward without a site allocation. It would need to be demonstrated that the loss of the facility could be compensated for in order to comply with Policy G5 and NPPF para.97.</p>	<p>the need for or possible replacement of the recreation facility.</p>
1243	Oriel College Sportsground	<p>Oriel college sports ground is considered to make an important contribution to the character of the conservation area, to the extent that development could not be accommodated in any part of the site without harm to that character. Therefore, the site has not been allocated for development.</p>	<p>The site is not allocated because of the likely level of harm to the conservation area.</p>
604	Lakefield Road Site	<p>This site has been included in the housing trajectory. There is considered to be scope within the site for housing and replacement if necessary of community facilities. An allocation policy is not considered to be necessary. The site is likely to come forward in the later stages of the Plan period.</p>	<p>The site is included in the housing trajectory.</p>
-	159-161 Cowley Road (Tesco Metro)	<p>The site had not previously been considered as it had not previously been put forward by the landowner. However, the site is approximately 0.2ha so is not large enough alone for an allocation, with no particular need for a specific policy. The uses suggested in the representation would all be potentially suitable on this site.</p>	<p>Site not allocated as no particular need for an allocation.</p>

Appendix 2.2: Sites identified in the Cundell Report with the potential for residential development and reviewed by Fortismere Associates to confirm Oxford’s housing capacity

Site identified in Cundell Report	Site Reviewed by Fortismere Associates and their conclusions.	How sites were taken account of in the Oxford City HELAA (PSD.2)
Oxford Golf Club – identifies 2 areas of golf club land (east and west) that it considers should be included.	Oxford Golf Club – Fortismere Associates concludes that site shouldn’t be included because of Lye Valley SSSI, hydrological constraints, sites recreational function and no landowner/leaseholder intention to release or vacate.	Site in use as an active golf club. Landowners have affirmed intention to retain existing use for at least the 15 years remaining on the lease. Site therefore unavailable and not likely to become available during the plan period. Also biodiversity implications of bringing this site forward include the site’s location in relation to the groundwater catchment area of the Lye Valley SSSI.
Oxford Greyhound Stadium, Sandy Lane – considers it should be included given previous assessment considered it acceptable.	Oxford Greyhound Stadium – recommends that site is assessed for a mixed use development not solely residential.	HELAA (2019) suggests that the site is suitable for residential, community or leisure use subject to it not affecting the operation of the heritage interest of the site. Site is suitable, available and achievable for housing (as enabling development for community/ leisure uses).
Northern Gateway – suggests level of housing is increased to 800 homes and questions whether employment led mixed use is appropriate.	Northern Gateway – concludes no change to current development capacity assumptions unless future masterplanning/ site specific analysis or planning applications result in a revised capacity for the site.	Site capacity limited to 500 homes through AAP process. The Habitat Regulations Assessment submitted as part of the evidence base for the AAP provides the rationale for restricting the capacity of the site to ensure no likely significant effects on the Oxford Meadows SAC. Current planning application (not for whole site) is for 480 homes.

Site identified in Cundell Report	Site Reviewed by Fortismere Associates and their conclusions.	How sites were taken account of in the Oxford City HELAA (PSD.2)
Blanchfords Builders Yard – suggests key employment status of site should be disregarded.	Blanchford & Co – concludes no change to current SHLAA but that site should be assessed as part of a strategic assessment of housing and employment land in line with PPG.	This site is assessed as part of HELAA (2019) as being in use as an active Category 3 employment site. The site is assessed as being both suitable and achievable. Site rejected as not available as to include at this stage of plan-making could have been seen as prejudging the loss of an active employment site in advance of the adoption of Policy E1.
Donnington Recreation Ground and Former St Augustine's Playing Fields – suggests inclusion in the SHLAA	Donnington Road Recreation Ground and Former St Augustine's Playing Field - concludes no change to the SHLAA assessment but that sites should be considered together with the other open and recreation spaces in and around Oxford as part of a strategic review.	HELAA (2019) does not consider the site as suitable as within an area with open space deficiencies.
Hill View Farm (Land at Mill Lane, Marston) & Land at Butts Lane - Argues that these are sites in the green belt that have potential for residential development.	Site 6: Green Belt sites at Mill Lane and Butts Lane – included in Green Belt study also report concludes no change to current SHLAA.	HELAA recognises development potential of some sites in the Green Belt and included Hill view Farm (SP26) and Land West of Mill Lane (SP27) as developable in line with the recommendations made by Fortismere Report
Barton Strategic Site – suggests that more units could be provided in the longer term, as identified in the Core Strategy.	Barton Strategic Site – concludes no change to current SHLAA but that the site capacity is kept under review.	Final site capacity (885) is within the range identified in the Core Strategy and AAP (800-1,200 homes) and was set by the outline planning application which was approved in 2013. The number of homes in the outline planning application was restricted by a number of factors including the need for land to provide a primary school; the need to preserve

Site identified in Cundell Report	Site Reviewed by Fortismere Associates and their conclusions.	How sites were taken account of in the Oxford City HELAA (PSD.2)
		landscape context and character of Old Headington; and existing site constraints (sub-station, allotments and preserving an appropriate buffer from development along the Bayswater Brook.
Warehouses off Kiln Lane – suggests it is a low quality key employment site and should be considered in a policy off approach.	Warehouses off Kiln Lane/ Unicol – concludes no change to current SHLAA but recommends site is considered a part of a strategic assessment of housing and employment land in line with the PPG.	Site currently occupied by same firm since 1960s. Firm has no plans to relocate. As such site not considered available for housing.
Bertie Place Recreation Ground – identified in Sites and Housing Plan and therefore shouldn't be excluded from consideration.	Bertie Place Recreation Ground – recommends no change to current SHLA as county council requires site for a school.	HELAA (2019) and proposed OLP2036 Policy SP33 continue to reflect the current position identified previously in the Sites and Housing Plan. This site is available for development.
Albion Place and Magistrates Court - identifies potential for long term mixed use development.	Albion Place and Magistrates Court – part of site developed for flats, no evidence of Magistrates court intention to relocate, therefore no evidence of availability. Concludes that although site is assessed as suitable it's not available.	HELAA (2019) no longer considers this site as there is no evidence of Magistrates court intention to relocate.
Jubilee Hall – identifies site as a possible consideration for the Affordable Homes programme. Suggests it should be included as windfall if 10 dwelling threshold not met.	Jubilee Hall - recommends no changes to SHLAA but that potential for increasing density should be explored through a density and viability study.	Site not taken forward as part of HELAA (2019) as site is below the 0.25ha threshold (site size 0.12ha). Given the need to provide replacement community facilities the site would be unlikely to deliver more than ten dwellings. Plan's projected windfall delivery would accommodate any housing delivery on this site.

Site identified in Cundell Report	Site Reviewed by Fortismere Associates and their conclusions.	How sites were taken account of in the Oxford City HELAA (PSD.2)
Housing Amenity Land off Townsend Square and other similar residential amenity sites – note that Oxford has built on amenity land before and if combined with Donnington Community Centre may have development potential.	Recommends no changes to current SHLAA but concludes that there is no compelling evidence which suggests that the SHLAA should be altered on a 'site by site basis' without an updated evidence based which considers capacity at a strategic level.	Site not taken forward as part of HELAA (2019) as site is below the 0.25ha threshold (site size 0.19ha). Plan's projected windfall delivery rate would accommodate any housing delivery on this small site.