

## **Local Plan 2040 Preferred Options**

### **Background paper: Housing site assessment process and methodology (including Sustainability Appraisal) (2022)**

#### **1. Introduction**

This background paper explains how the potential housing or mixed-use sites which are proposed in the Oxford Local Plan 2040 Preferred Options have been assessed, and the methodology and assumptions which have been applied. This covers sites which are proposed for residential uses or for economic uses, as well as other uses such as leisure. It also explains how this process works alongside the Sustainability Appraisal process to consider the sites.

It then goes on to explain the further stages of assessment which will be applied as the Plan progresses to the next stages to inform the drafting of policies.

#### **2. Context**

The Local Plan 2040 will include site allocation policies including for residential, employment and other uses. This is important in order to provide certainty to communities and landowners about where the main elements of development are likely to take place during the Plan period to 2040. In Oxford, there will also tend to be a significant element of ‘windfall’ development on unidentified sites because of the nature of sites in the city, especially sites which come forward for housing, being so small (less than 10 dwellings or 0.25ha).

To inform the site allocations policies, a robust site assessment process has been undertaken which has comprised of several inputs:

- Housing and Economic Land Availability Assessment (HELAA) (2022 update)
- Urban Design assessments (2022)
- Site assessment (incorporating Sustainability Appraisal) proformas (2022)

This background paper explains the process and key assumptions for each of these elements and signposts to where you can find more information. Where there is relevant Government guidance in place then it also explains how it has been applied in the context of Oxford.

#### **3. The site assessment process for the Local Plan 2040**

The starting point for identifying potential site allocations is the outputs from the Housing and Economic Land Availability Assessment (HELAA) 2022 interim update, specifically the list of sites in Appendix B which lists all the sites which meet the HELAA criteria of being Suitable, Available and Achievable (as per the Government’s HELAA Guidance<sup>1</sup>).

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<sup>1</sup> [Housing and Economic Land Availability Assessment Government Guidance](#)

Those sites from Appendix B of the HELAA were then appraised using a Site Assessment template, which also incorporated Sustainability Appraisal. A copy of the template is attached in Appendix A of this paper.

Any sites which are already allocated in the current Local Plan (either in Local Plan 2036 or in Area Action Plans) have also been reviewed: site allocations have not automatically been carried forward if they have already commenced development: So the two strategic sites of Oxford North (formerly Northern Gateway) and Barton Park which have their own policy framework set out in an SPD, and development has commenced on both sites, do not need a separate site allocation policy in the Local Plan 2040.

#### **4. Housing and Economic Land Availability Assessment (2022 interim update)**

The HELAA is regularly updated in order to ensure we capture the latest landowner positions, such as any changes to land ownership, landowner intentions, and viability (eg changes to sales values, built costs etc); and the latest position in terms of planning permissions and completions. The previous HELAA was undertaken in 2019. The 2022 update has also considered the informal Oxfordshire HELAA Joint Methodology, which was developed and agreed by all the Oxfordshire district councils and the Oxfordshire Plan 2050 team in 2021. Whilst work on the Oxfordshire Plan is no longer continuing, this methodology is valuable because it demonstrates that the approach taken in Oxford is consistent and informally agreed across Oxfordshire.

The full methodology and assumptions for the HELAA are explained in the Methodology section of the HELAA document itself so are not repeated here. However, the 2022 update does seek to respond to the housing crisis in Oxford and shortage of available land by additional measures to identify sites:

- Sites in Flood Zone 3a and 3b are included in the assessment if they are brownfield. This is a specific agreement with the Environment Agency in recognition that Oxford has existing developments which could bring sustainability benefits from very careful regeneration or redevelopment schemes in FZ3. An updated SFRA is also being undertaken;
- Sites within the Oxford Green Belt are included in the assessment, except for sites where development would have a high or moderate-high impact on the purposes of the Green Belt. An updated Green Belt assessment is also being commissioned to support the Local Plan 2040;
- Public open space, private open space, and outdoor sports facilities are included in the assessment;
- Allotments are included in the assessment;
- Employment sites, including Category 1 and Category 2 sites protected in the 2036 Local Plan, are included in the assessment and the approach to allowing housing development on employment sites has been broadened in the policy options. More details are set out in the Economy background paper.

In addition, a Steering Group was set up with partners from the Oxfordshire district councils, to regularly discuss and review assumptions and details about the approach and help ensure consistency.

Of the sites which meet the Suitable, Achievable, Available criteria from the HELAA guidance, additional measures were taken to check capacity and delivery assumptions about those sites contributing to supply.

It should be noted that because the base date of the 2040 Local Plan (and therefore the base date of the HELAA) is 2020 then inevitably some sites listed in the 2022 HELAA update have already commenced and in some cases have completed the development. These are included however because they fall within the Plan period and are contributing to supply in the period 2020-2040 but are clearly indicated in HELAA Appendix D (Sites completed since 01.04.2020) which ensures that there is no double counting.

A significant number of HELAA sites are already in the Oxford Housing Trajectory because they have an extant planning permission or have a site allocation policy. In those instances, the capacity estimates are established in the planning permission or through the Inspector's examination of the policy in the 2036 Plan, so those figures have been applied. For planning permissions, it is reasonable to assume for most sites the buildout will be within the first five years, especially given the relatively small scale of most of the sites in Oxford. For sites with allocations which do not yet have permission, timescales were re-checked with landowners.

The updated windfall calculation, and how this relates to the site size threshold applied for the HELAA, is also explained in the HELAA. The updated windfall assumption for the 2022 HELAA is 127 dpa.

The 2022 update assesses 471 sites which are all listed in Appendix A of the HELAA. This includes the sites in the 2019 HELAA plus any additional sites which have been submitted in the Call for sites, or that have been identified via the planning process (planning permissions etc).

The sites which meet the HELAA criteria of being Suitable, Available and Achievable (as per the HELAA Guidance) are then listed in Appendix B of the HELAA. This identifies a potential capacity in Oxford of 9,147 homes, from 114 sites which meet the HELAA criteria.

## **5. Urban Design assessment**

In the HELAA, the capacity estimates are informed in the first instance if there is an extant planning permission in place, or a site allocation with a capacity figure which has been subject to examination by an independent inspector at Examination.

To supplement and refine the capacity estimates for the other sites in the HELAA where we did not have a site-specific capacity figure, individual urban design work was undertaken to review the site. Therefore urban design assessments were only undertaken where it would add value to help refine a capacity estimate, ie where there was not existing detailed site-specific consideration of design elements and constraints through the planning process.

A template was developed in house by the Urban Design Team which reflects the NPPF Chapter 11: Making Effective Use of Land. Paragraph 125 explains, in relating to achieving appropriate densities at a development: "area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places". Linked to this, NPPF Chapter 12: Achieving Well-designed Places, emphasises making 'beautiful' and

‘sustainable’ places, and the use of plans, design policy, guidance and codes is hugely encouraged. For example, Paragraph 128 sets out that “all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.”

Another important insertion is paragraph 131, which sets out that important contribution trees make to the character and quality of urban environments. It requires that planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments. It also sets out a requirement that appropriate measures are in place to secure the long-term maintenance of newly planted trees and existing trees are retained wherever possible.

The importance of policies and guidance is reiterated at paragraph 134, which states development that is not well designed should be refused “especially where it fails to reflect local design policies and government guidance on design”.

## **6. Site assessment (incorporating Sustainability Appraisal)**

All of the sites which met the HELAA criteria were further assessed using a site assessment template to gain a deeper understanding about the constraints and opportunities of those sites. A copy of the template is attached in Appendix A of this paper.

The template considers the plan objectives as well as Sustainability Appraisal objectives, it clearly indicates which SA objective relates to which assessment section. This is based on the site assessment criteria suggested in the SA Scoping Report (2021)<sup>2</sup>.

The site assessments have a dual purpose: they are the initial filter for identifying preferred options for which sites to allocate, and they also assess those sites against Sustainability Appraisal criteria. Inevitably there is some overlap between the assessments, so the proforma covers both tasks. It considers constraints, deliverability considerations, and also sustainability impacts of potential development on that site.

It then identifies what the preferred option land use would be, which in most cases is residential uses because of the urgent and pressing need for housing in Oxford.

## **7. Next steps**

Following the Preferred Options consultation, the draft site allocation policies will be reviewed and refined further.

The additional work that will inform this further work includes:

- Consultation responses;

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<sup>2</sup> [Oxford Local Plan 2040 Sustainability Appraisal Scoping Report](#)

- Further update of the HELAA – to ensure we capture latest landowner positions, such as any changes to land ownership, landowner intentions, and viability; and latest position in terms of planning permissions and completions;
- More detailed viability appraisal of the whole Local Plan and of individual sites;
- Further Flood Risk assessment, including a Level 2 in-depth assessment for any proposed sites which are in Flood Zone 2 or 3a;
- Further site-specific urban design assessment work where required to develop site-specific design considerations or policy requirements and capacity estimates for sites; and
- General updates to reflect other Local Plan evidence base that has been completed in the meantime, and any changes to national guidance or the NPPF.

## **8. Appendices**

Appendix A - Copy of Site assessment proforma (incorporating Sustainability Appraisal)

Appendix B - Copy of Urban Design Framework template