

CHAPTER TWO  
A HEALTHY INCLUSIVE  
CITY TO LIVE IN

OXFORD  
LOCAL  
PLAN 2040



## INTRODUCTION AND WIDER CONTEXT



**Figure 2-1: Oxford's housing need information**

- 2.1 The limited supply of housing in the city has many negative impacts. This combined with the high and ever-increasing construction costs exacerbate inequalities by leading to high property prices and a limited supply of affordable housing. It can result in some residents being forced into overcrowded and unsuitable accommodation. Many are unable to access housing in the city, which for some, means moving out of the city and commuting in to work, which has associated environmental impacts and additional costs. For others, it means leaving the city altogether in search of a more affordable area to live and work. As such, some employers experience high staff turnover and vacancy rates which can affect their operation. This is particularly apparent in the city's schools, hospitals, care homes, public transport services, the building industry and the universities.
- 2.2 The Figure 2-2 (overleaf) shows that in 2019 (the most recent data), 11 of Oxford's LSOAs fall in the 20 per cent and 4 LSOAs in the 10 percent most deprived nationally for barriers to housing and services, and there are significant differences across the city. Addressing this housing crisis is a key priority for the Plan.
- 2.3 This chapter sets out options for the following housing policy areas:
- Housing requirement and housing need
  - Delivering affordable homes
  - Creating a mixed and balanced community
  - Specialist housing needs.

<sup>2</sup> <https://www.oxford.gov.uk/propertylicensing> (Appendix 1 - Housing Stock Condition and Stressors Report)



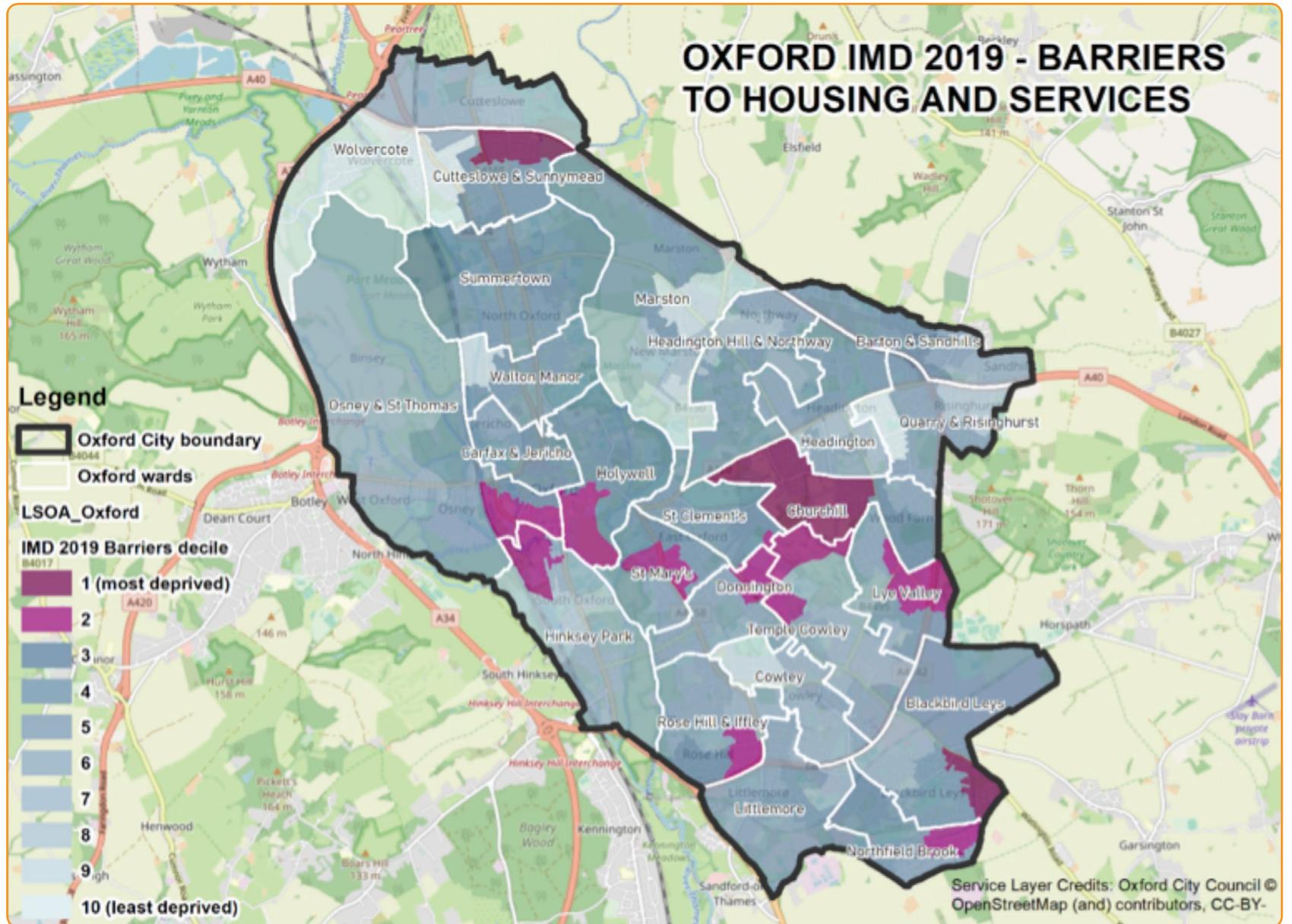


Figure 2-2: Index of deprivation barriers to housing and services, by Lower Super Output Area (LSOA)

## THE HOUSING NEED AND HOUSING REQUIREMENT

**Housing need** must be established and confirmed through the evidence base undertaken and planned for. We may not be able to meet all the housing need in Oxford so the calculated need won't necessarily be the housing target in the Plan - that is the **housing requirement**. To illustrate this, in the Oxford Local Plan 2036 the housing requirement over the plan period is 10,885 homes, with an unmet housing need of 15,000 (the neighbouring districts have allocations in their adopted local plans which will accommodate this unmet need – as set out in Figures 8-2 & 8-3 of Chapter 8 Development Sites, Areas of Focus and Infrastructure).

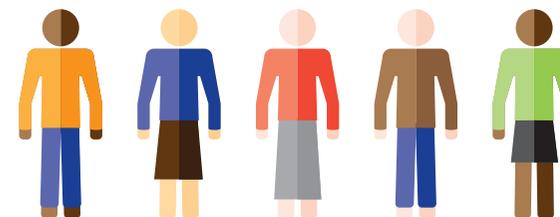
### HOUSING REQUIREMENT

2.4 The Local Plan must set out a total housing requirement for the plan period, setting out the number of houses that are required to be delivered each year. The Government checks delivery of housing in each planning authority in the Housing Delivery Test and there are sanctions if the requirement is not met.

### HOUSING NEED

2.5 The minimum housing need figure for Oxford can be calculated by using the standard method as set out in National Planning Policy Guidance paragraph 61 which states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”. We consider that circumstances are likely to exist in Oxfordshire that justify using an alternative method to calculate housing need, owing to its important role in the local and national economy.

2.6 The evidence base for calculating the housing need figure for Oxford to 2040 has yet to be calculated. The work was being undertaken as part of the Oxfordshire Plan 2050, but now the OP2050 is not proceeding, we will commission a piece of work to establish housing need, with a methodology agreed with as many of our neighboring districts as possible. However, what is known at the current time is that the capacity of Oxford to accommodate housing is lower than even the lowest possible housing need, which would be the figure determined by the Standard Method. It is considered there are reasons to diverge from the Standard Method in Oxfordshire (as discussed in relation to the options below). The housing need and the housing requirement set in the plan will differ because capacity is limited<sup>3</sup>, and the full need cannot be met. As Oxford cannot meet its housing need it should ideally be demonstrated how the need is being met outside of the authority's boundaries. This work would also have taken place as part of the Oxfordshire Plan process. However, in the absence of that, other means of joint discussion will be needed. Therefore, the housing needs evidence base, alongside a better indication of the magnitude of the unmet need, will form part of an additional consultation in 2023.



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<sup>3</sup> An assessment of housing capacity in the HELAA indicates a capacity of c.9,147 dwellings

## POLICY OPTION SET H1: HOUSING REQUIREMENT FOR THE PLAN PERIOD

- a Option for policy approach**  
Set a capacity-based/constraint-based housing requirement (c.9,147 dwellings over the Plan period 2020-2040).

**+ Potential positive consequences of the approach**  
This requirement would be deliverable within the city (this is the only option that achieves this).

The principle has been tested at examination and found sound for LP2036, the Core Strategy and the 2016 Local Plan before that.

**- Potential negative/neutral consequences of the approach**  
It will need to be shown that need is being met elsewhere if provision is not made for the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement (see options below).

If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.

### Related options, conclusion

Preferred Option

- b Option for policy approach**  
Set a housing requirement in the Plan based on the identified housing need.

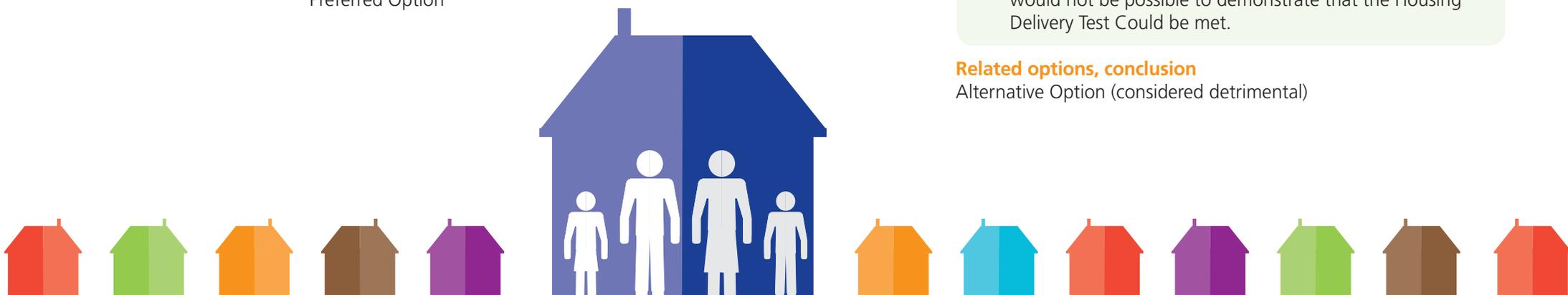
**+ Potential positive consequences of the approach**  
The NPPF says that Local Plans should aim to meet identified need.

**- Potential negative/neutral consequences of the approach**  
Housing completions over the previous decade have averaged 400dpa which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build to densities that negatively impact character and quality of life, for example by being very high and overshadowing and impacting on views. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is a significant need on the city and to protect important green spaces and local character.

It would still not be practically possible to meet the need, meaning that the Plan could not be found sound as it would not be possible to demonstrate that the Housing Delivery Test Could be met.

### Related options, conclusion

Alternative Option (considered detrimental)



## POLICY OPTION SET H2: HOUSING NEED FOR THE PLAN PERIOD

- a Option for policy approach**  
Define housing need based on the Standard Method calculation of need. (The level of need would be approximately 729 dwellings per annum).

**+ Potential positive consequences of the approach**

It is NPPF compliant to calculate the minimum housing need using the standard method and to attempt to meet that housing need in the Plan (the NPPF does also allow for other calculations of need, where justifying circumstances exist).

**- Potential negative/neutral consequences of the approach**

Circumstances exist in Oxford and Oxfordshire that justify alternative methods of calculating need. The standard need calculation does not take account of the strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting.

**Related options, conclusion**

Option

- b Option for policy approach**  
Set a housing requirement based on the need calculated by seeking to achieve and support the economic growth, i.e. plan housing to support the forecast increase in workers. Set affordability-based target i.e. seek to meet full affordable housing need.

**+ Potential positive consequences of the approach**

With the Oxford Local Plan 2036 the Inspector agreed that circumstances existed to divert from the standard method and use an alternative means of calculating housing need, which for Oxford was based on meeting the significant affordable housing need. The Growth Deal existing to 2031 suggests it wouldn't be sound to use the Standard Method. The LIS is the adopted economic strategy for Oxfordshire. Oxford plays a key role in that strategy and Oxford's economy makes a considerable contribution to the regional and national GDP. Delivery of a level of housing to support economic growth is identified as a key element of the LIS ambitions and is part of the Oxfordshire Growth Deal until 2031. Affordable housing is a clear priority in Oxford. The level of affordable housing need is great and the standard method does not sufficiently help to delivering this need in full. Delivering sufficient affordable housing would make a significant difference to opportunities for Oxford's residents. Addressing inequalities is a priority and this can only be achieved by supporting the economy, including through delivery of sufficient housing, and provision of affordable housing.

**- Potential negative/neutral consequences of the approach**

The HELAA evidence base indicates that this option would be undeliverable in Oxford over the plan period, thus there would be significant unmet need issues and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. The LIS was undertaken before the pandemic, and the economic forecasts may need adjustments. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

**Related options, conclusion**

Option

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## DELIVERING AFFORDABLE HOMES

2.7 Oxford's need for affordable homes and the delivery of such homes is a key part of creating mixed and balanced communities, as such this remains a key priority for the City Council. Affordable housing is housing for sale or rent for those whose needs are not met by the market. The different types of affordable housing and tenure types include discounted rents and subsidised routes to buy. The provision of affordable housing on-site is important and preferred because it provides more certainty in helping to deliver mixed and balanced communities across Oxford. In addition, provision of on-site affordable housing by the developer helps to alleviate the challenge of finding other sites, which is very demanding when supply is so limited. When on site provision is not practicable then a financial contribution will be sought.

Viability testing will be undertaken to establish the threshold, the percentage of affordable housing and the mix of affordable housing tenures to be delivered on sites. However, the NPPF is clear that only sites of 10 or more units should be required to deliver affordable housing.



2.8 Affordable housing tenure types include:

- Social rent: the most affordable housing type. Rent set at a much lower rate than available on the open market (calculated using the Government's formula)
- Affordable housing for rent: rent discounted to at least 20% below local market rents (not considered affordable in Oxford)
- First Homes: discounted to no more than £250,000 (40% discount required in Oxford) and available to first-time buyers/ households earning no more than £80,000
- Other affordable routes to home ownership include shared ownership where a share of the homes is bought (using a mortgage) and the remainder is rented.

2.9 First Homes are a new form of affordable housing, introduced in a Ministerial Statement in May 2021, intended to help with home ownership. First Homes are offered for sale at a discounted rate but must meet certain criteria set out in national policy; as set out in national policy, a minimum of 25% of all affordable housing units secured using developer contributions should be First Homes. Where a development cannot provide affordable housing units on site, 25% of the financial contribution should be used to provide First Homes elsewhere. The First Homes requirement has only recently come into effect, so there is less evidence available to inform the delivery of this element. However, we are aware that there is strong risk that the First Homes delivered will be mostly one bed homes owing to the price cap and the values in Oxford, which have the potential to skew housing mix on sites and produce less one bed socially rented flats on a site, thus not meeting the housing needs of single people and couples that would require such accommodation.

## POLICY OPTION SET H3: AFFORDABLE HOUSING – OVERALL REQUIREMENT

### a Option for policy approach

Continue to prioritise the delivery of affordable housing requiring, dependent on viability, but for example as now, 50% of the overall housing requirement to be for affordable housing. Of the 50% affordable homes:

- 25% to be First Homes and 70% Social Rented and 5% intermediate (shared ownership being most likely).

#### + Potential positive consequences of the approach

Key element of creating and maintaining mixed and balanced communities.

Prioritising Social Rent over intermediate forms of housing ensures that those in greatest housing need can access housing with rents set at local housing authority rents. (Note 25% First Homes is target set in national policy).

50% affordable has been deliverable and viable in the city under the current Local Plan 2036 and the previous Core Strategy policies.

#### - Potential negative/neutral consequences of the approach

This approach has implications in terms of development viability particularly with the introduction of the First Homes requirement.

Prioritising Social Rent over other intermediate housing can disadvantage those sectors of society who have a slightly higher household income and who would be further down the housing list, and yet for whom purchasing a property in Oxford is beyond their reach. Intermediate housing types such as Shared Ownership are very popular but would not come forward with this approach. The result is potential polarisation of the housing market where only those with high incomes and those in greatest housing need can afford to live in the city.

#### Related options, conclusion

Option

### b Option for policy approach

Include a policy for affordable housing that does not require delivery of any First Homes e.g. 80% of affordable is Social Rented and 20% intermediate (such as Shared Ownership).

#### + Potential positive consequences of the approach

First Homes do not help those in greatest housing need; this approach would ensure we could continue to provide Social Rented homes, which are achievable for a wider range of people and help to reduce inequalities in access to decent homes.

#### - Potential negative/neutral consequences of the approach

First Homes are currently required in national policy. They may encourage those who work in Oxford but can't afford to buy here to remain in the city, reducing commuting, overcrowding and problems of a transient community.

#### Related options, conclusion

Option

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**c Option for policy approach**  
 Seek to maximise the delivery of affordable housing overall, rather than maximising Social Rented- to be viable, this option will include a lower overall proportion of Social Rented housing and a larger amount of intermediate housing such as shared ownership. For example 60% affordable housing overall with 50% social rented, 25% first homes and 25% intermediate housing, dependent on viability testing.

**+ Potential positive consequences of the approach**  
 This would lead to the delivery of the maximum number of affordable homes for those in the greatest housing need.

**- Potential negative/neutral consequences of the approach**  
 Increasing the % of affordable to above 50% to be delivered on sites could negatively impact upon viability and result in longer negotiations and delays to site delivery and ultimately reduction of Social Rented provision to compensate/balance viability.

There is no evidence that a higher rate is deliverable in the city.

First Homes and Shared Ownership homes are not allocated to households on the Oxford Housing Register, and do not therefore directly meet the housing needs of the households most in housing need locally. They are not suitable for many households, including most homeless households or persons without, or with a poor credit or tenancy history. Reducing Social Rent will make meeting the housing needs of local income households more challenging.

**Related options, conclusion**  
 Option (considered detrimental)

**d Option for policy approach**  
 Focus on maximising the amount of Social Rented housing required, rather than focusing on the delivery of as much affordable housing of any kind as is viable. This may lead to a reduced proportion of affordable housing overall.

**+ Potential positive consequences of the approach**  
 This option may result in delivering fewer than possible affordable homes, but the affordable homes delivered would be meeting the greatest housing need.

**- Potential negative/neutral consequences of the approach**  
 This would result in the delivery of fewer affordable houses. The level of affordable housing need would progressively worsen as the rate of supply would slow whilst the rate of demand would continue unchanged resulting in bigger affordability issues to be dealt with in future years. It does not help meet the needs of households that could afford shared ownership/ low-cost home ownership models.

**Related options, conclusion**  
 Option (considered detrimental)



**e Option for policy approach**

Do not maximise affordable housing requirements in terms of Social Rented or overall amount but set them at a level that leaves more profit for developers and more opportunity for wider developer contributions.

**+ Potential positive consequences of the approach**  
This would allow for stringent requirements in other areas that cost developers money, for example carbon efficiency. The greater profit potentially available may encourage delivery of sites.

**- Potential negative/neutral consequences of the approach**  
This approach would fail to maximise opportunities to address the housing crisis and it is not necessary in order to encourage sites if careful viability work helps to demonstrate what can be realistically afforded whilst retaining a worthwhile profit.

There are severely limited site opportunities to spend developer contributions on.

**Related options, conclusion**  
Option (considered detrimental)



**f Option for policy approach**

Do not include a policy requiring affordable housing.

**+ Potential positive consequences of the approach**  
This would remove any possibility of viability preventing sites coming forward and it would allow maximum requirements in other areas.

**- Potential negative/neutral consequences of the approach**  
This would not be attempting to meet affordable housing needs, as is required by the NPPF, so would not be a sound approach. It would do nothing to address the housing crisis.

**Related options, conclusion**  
Option (considered detrimental)

## POLICY OPTION SET H4: AFFORDABLE HOUSING: FINANCIAL CONTRIBUTIONS FOR NEW STUDENT ACCOMMODATION SITES/CAMPUS AND OTHER NON-SELF-CONTAINED OR SPECIALIST HOUSING

- a Option for policy approach**  
Seek a financial contribution towards affordable housing to be delivered elsewhere in Oxford from development of student accommodation of 25 or more rooms or 10 or more self-contained units.

**+ Potential positive consequences of the approach**

In many situations, affordable housing would not be suitable to be provided on student sites, therefore a financial contribution is the preferred approach. This provides an additional source of affordable housing contributions.

**- Potential negative/neutral consequences of the approach**

The seeking of financial contributions provides less certainty than developing on site affordable housing. Would need to be tested through plan viability.

**Related options, conclusion**

Preferred Option

- b Option for policy approach**  
Require affordable housing to be delivered on-site within the scheme.

**+ Potential positive consequences of the approach**

Provides more certainty that affordable housing would be delivered.

**- Potential negative/neutral consequences of the approach**

Would place more burden on the universities and could undermine the provision of student accommodation to meet their needs and then restrict them being able to expand/redevelop their academic facilities.

In many situations, affordable housing would not be suitable to be provided on student sites. Or on sites delivering extra care or other specialist housing.

**Related options, conclusion**

Alternative Option

- c Option for policy approach**  
Relax current policy and only require financial contributions from larger student schemes, for example of more than 50 rooms (or 20 self-contained units).

**+ Potential positive consequences of the approach**

Improved viability for student accommodation schemes, especially smaller schemes.

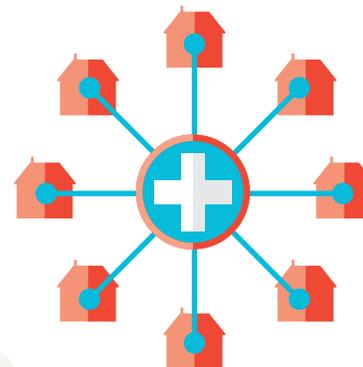
**- Potential negative/neutral consequences of the approach**

Result in a reduced financial contribution from what would be sought if the site was for general housing.

This could encourage landowners to opt for student accommodation in unsuitable locations instead of residential homes if the affordable housing requirement is less for these types of schemes.

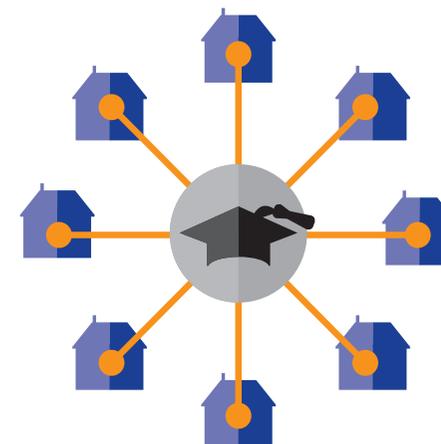
**Related options, conclusion**

Alternative Option  
(considered detrimental)



### EMPLOYER-LINKED AFFORDABLE HOUSING

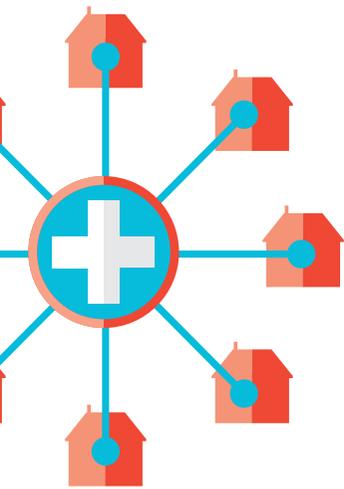
2.10 Employers in Oxford are facing significant challenges in recruiting and retaining staff as a result of the lack of availability and affordability of housing. This lack of accommodation is resulting in a recruitment crisis across a range of sectors. This policy option has been developed so that certain employers on named sites could contribute to addressing their own staff recruitment and retention issues by delivering homes for rent to their staff that is 100% affordable. It only applies to sites that would not contribute to general affordable housing needs, that would not otherwise come forward for housing development. It is anticipated these would be sites belonging the Oxford University and the Hospital Trust. There may be scope to widen this list if landowners come forward with an interest in delivering some employer linked affordable housing on their own land. Interested landowners can express feedback via this Preferred Options consultation.



**d Option for policy approach**  
Do not require a financial contribution from any student accommodation site.

- + Potential positive consequences of the approach**  
This may encourage more student housing to come forward which will release other housing stock for Oxford residents.
- Potential negative/neutral consequences of the approach**  
This would make the development of student accommodation disproportionately more attractive than the development of general housing which would result in sites suitable for housing being delivered just for student accommodation, this would make it hard to deliver the objectives of the Plan. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site was being developed for general housing. This could impact on the overall provision of affordable housing in Oxford.

**Related options, conclusion**  
Alternative Option (considered detrimental)



## POLICY OPTION SET H5: EMPLOYER-LINKED AFFORDABLE HOUSING

- a Option for policy approach**  
On specified sites which would be listed in the Plan allow schemes that are available for employees who work for a specific organisation at a rent level affordable to them (as agreed with the local authority. Partial rent forms such as shared ownership may be possible if part remains in the ownership of the employer. Those on student placements may be considered employees).

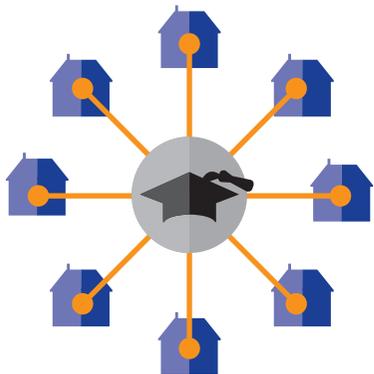
**+ Potential positive consequences of the approach**  
Provides mechanism for employers to actively help address affordable housing issues for employees, which in turn could help reduce pressure on the housing register.

Could support wider objectives of the Plan such as decreasing need to travel. The option could help to bring forward sites which would not otherwise be available for residential uses (for example by being located on operational campuses).

**- Potential negative/neutral consequences of the approach**  
Limited number of employers could benefit as they would need to own (suitable) land to build on and be able to act as a developer.

It is important that this does not undermine delivery of Social Rented housing, which meets the needs of those in greatest housing need. It should be restricted only to sites unlikely to deliver affordable general needs housing to households in housing need.

**Related options, conclusion**  
Preferred Option



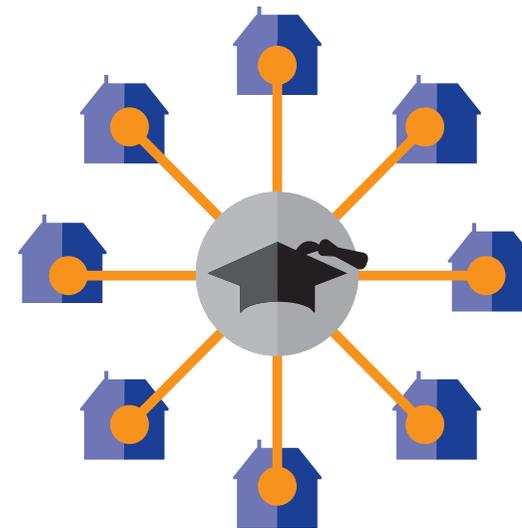
- b Option for policy approach**  
Do not consider an employer linked housing policy.

**+ Potential positive consequences of the approach**  
Removes any risk that that delivery of Social Rented housing will be undermined.

**- Potential negative/neutral consequences of the approach**  
Landowners may be put off bringing forward certain sites, if not suitable for general residential schemes e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living.

Removing this policy could exclude an alternative potential supply of affordable housing or sterilise sites.

**Related options, conclusion**  
Alternative Option

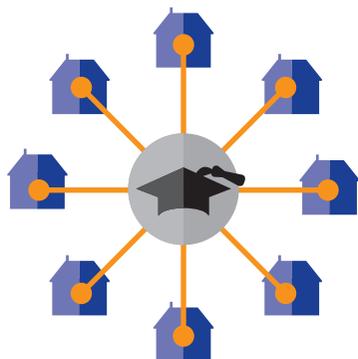
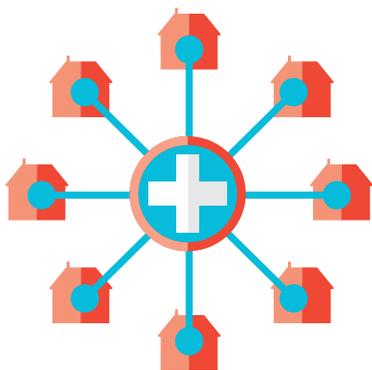
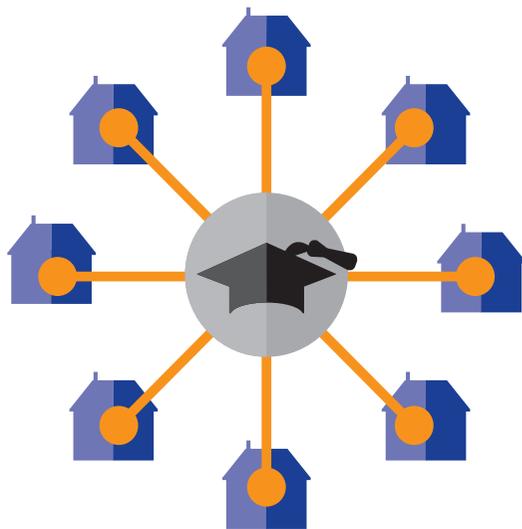




## CREATING MIXED AND BALANCED COMMUNITIES

### Mix of dwelling sizes

2.11 It is important that a range of affordable housing types are available to meet the wide range of needs. The NPPF requires local planning authorities to plan for a mix of homes based on current and future demographic trends, market trends and the needs of different groups in the community. The size, type, tenure and range of homes needs to reflect local needs to ensure that mixed and balanced communities are supported. The housing need across Oxford is high and as such all types and sizes of dwellings are required. However, some sites and the area context will lend itself to certain mixes of dwellings. The city centre and district centres are most likely to be suitable for higher density developments and it is expected that dwelling densities would continue to be higher than those in neighbouring districts reflecting Oxford's urban area.



## POLICY OPTION SET H6: MIX OF HOUSING SIZES (NO. BEDROOMS)

- a Option for policy approach**  
Set a policy mix to ensure a range of sizes of unit for affordable housing (this would apply to all tenures except the market housing). This could be only on larger sites and outside of highest density areas. The mix could be defined by number of bedrooms or bedspaces. Flexibility to be part of the policy to ensure that the mix reflects the most up to date needs for the city following engagement with housing officers. (If the scheme is 100% affordable housing then the mix only applies to the proportion required to be affordable housing).

**+ Potential positive consequences of the approach**  
It is important that there is a good housing mix where possible to meet a wide range of demand. The affordable housing mix will be informed by the housing register (a snapshot in time), existing housing stock, and acknowledgement that tenants' needs change over time and may need to downsize.

**- Potential negative/neutral consequences of the approach**  
A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if there was no requirement for large units, or the local context may be more suited.

**Related options, conclusion**  
Option



- b Option for policy approach**  
Set a mix for both market and affordable homes and on a broader range of sites, for example all those over 10 units.

**+ Potential positive consequences of the approach**  
This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.

**- Potential negative/neutral consequences of the approach**  
This would not allow for a flexible response to the market, to changing needs in an area or the context of a site. A more prescriptive policy approach would mean that sites at district centres and in the city centre would need to have a range of unit sizes, rather than just those that maximise density, so overall numbers may be reduced.

**Related options, conclusion**  
Option

**c Option for policy approach**  
Do not specify a mix of unit sizes for any type of development but do require at least 2 or 3 types of unit size in all developments over, for example, 25 units. Also ask developers of all sites over 10 units to explain reasons for their choice of mix and to demonstrate how it delivers mixed and balanced communities which take account of the housing list and the context.

**+ Potential positive consequences of the approach**  
This would enable the mix to be tailored to the site context and the most up-to-date data, for example the current needs on the housing list. It would also ensure there is more than one unit type coming forward. More flexibility would allow more tailoring to the location.

**- Potential negative/neutral consequences of the approach**  
This level of flexibility in the policy requirement could be met with a very limited range of unit sizes. It would be more likely to fail to meet identified needs and could lead to an imbalance in sizes of new units entering the market and available as affordable housing both in the short term and the longer term.

**Related options, conclusion**  
Option

**d Option for policy approach**  
Focus on a mix of affordable housing unit sizes which is responsive to the housing list and therefore identified needs.

**+ Potential positive consequences of the approach**  
Such an approach could help ensure that what is being delivered is meeting immediate needs. It would provide an indicative mix which would also be informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.

**- Potential negative/neutral consequences of the approach**  
Such an approach is dependent on reliable and up to date data. The housing list is only a snapshot in time (updated continuously). If for example there are several years with a need mainly for small units and only those are delivered, this will lead to a lack of variety, then in later years when needs may change and there will not be enough larger units to accommodate needs appropriately. This would not achieve mixed or balanced communities. It would not provide enough certainty for developers; a policy with a changing requirement may not be found sound.

**Related options, conclusion**  
Option (considered detrimental)

**e Option for policy approach**  
Do not include a mix policy (for market or affordable homes).

**+ Potential positive consequences of the approach**  
Provides complete flexibility.

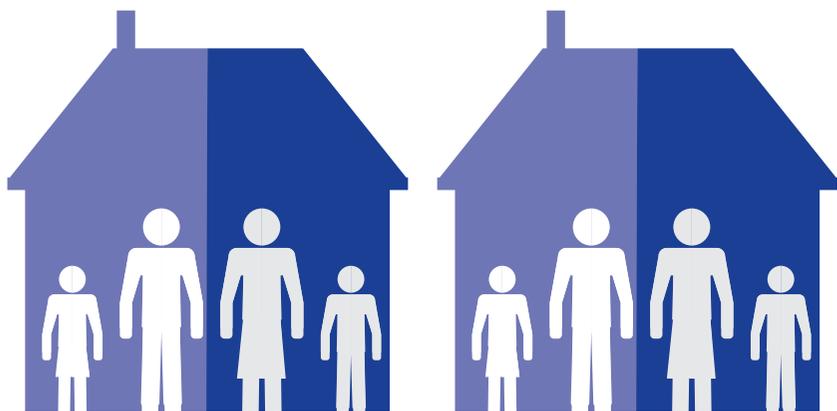
**- Potential negative/neutral consequences of the approach**  
The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. It would be difficult to demonstrate that the Plan is providing for the needs of different groups in the community as per the NPPF. One-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.

**Related options, conclusion**  
Option (considered detrimental)



## DEVELOPMENT INVOLVING LOSS OF FAMILY DWELLINGS

- 2.12 Oxford can never meet its full housing need and as such it is important to ensure that the existing stock of homes is protected. This is particularly the case in order to protect the supply of family-sized homes (currently defined as 2+ bed houses and 3+ beds flats, although many 2 bed flats already house families and are adequate to do so) which are often under pressure to be subdivided into flats or converted into HMOs. The city is facing considerable pressure from the use of residential units as short term lets such as through Air BnB which are taking more properties away from the longer term private rented sector and or providing family homes.



## POLICY OPTION SET H7: LOSS OF FAMILY DWELLINGS

- a** **Option for policy approach**  
Resist a net loss of family dwellings except for specific reasons.

**+** **Potential positive consequences of the approach**

Such specific reasons for an exception could include conversion to a nursery or primary care facility; therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.

**-** **Potential negative/neutral consequences of the approach**

The loss of family dwellings undermines the benefits of building a mix of new homes which include homes suitable for families.

**Related options, conclusion**  
Preferred Option

- b** **Option for policy approach**  
Resist the subdivision of family homes.

**+** **Potential positive consequences of the approach**

Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.

**-** **Potential negative/neutral consequences of the approach**

Precludes the sub-division of the existing housing stock which in some instances would be a better or more efficient use of land in a particular location and provide more homes where the need is so great. The loss of family dwellings undermines the benefits of building a mix of new homes which include homes suitable for families.

**Related options, conclusion**  
Alternative Option

- c Option for policy approach**  
Resist the loss of family homes to short term lets such as Air Bed and Breakfast (Air BnB).

**+ Potential positive consequences of the approach**  
Helps to maintain the existing supply of homes to ensure a varied supply of homes across the city.

**- Potential negative/neutral consequences of the approach**  
It goes beyond the planning policies and more suited to being managed through licensing.

**Related options, conclusion**

Alternative Option  
(considered detrimental)

- d Option for policy approach**  
Have no restrictions on the loss of family dwellings.

**+ Potential positive consequences of the approach**  
No restrictions means that housing stock can be changed as the market demand requires. There would be more flexibility to respond to the market. Overall numbers of homes could increase.

**- Potential negative/neutral consequences of the approach**  
Losing control over the existing supply of family housing would undermine the benefits of bringing forward the right mix of housing in new development to meet the population’s current and future needs (objectively assessed need).

**Related options, conclusion**

Alternative Option  
(considered detrimental)

**HOUSES OF MULTIPLE OCCUPATION (HMOS)**

2.13 A House in Multiple Occupation (HMO), in Oxford, is defined as a shared house occupied by three or more individuals, forming two or more households, as their only or main residence, who share amenities such as the kitchen and bathroom. According to OCC’s recent ‘Review of Licensing of HMOs (2020)’ in 2018, just under 9% of all dwellings in the city (58,910) were HMOs (5,240), indicating the important role they provide in meeting Oxford’s housing needs. For many people, HMOs offer the only affordable solution as they are not able to rent individually or buy a property in the city. In some areas of the city the concentration of HMOs has resulted in changes to the character of the local area which has led to concerns across communities that the balance of households is dominated by HMOs. These shorter-term tenancies can result in a feeling of a transient population.

2.14 Purpose-built HMOs could help to reduce some of the potential management issues or neighbour conflicts because issues like car and cycle parking, bin storage can be fully addressed and incorporated into the design at the planning application stage rather than existing buildings having to be adapted or retrofitted.



## POLICY OPTION SET H8: HOUSE OF MULTIPLE OCCUPATION (HMOS)

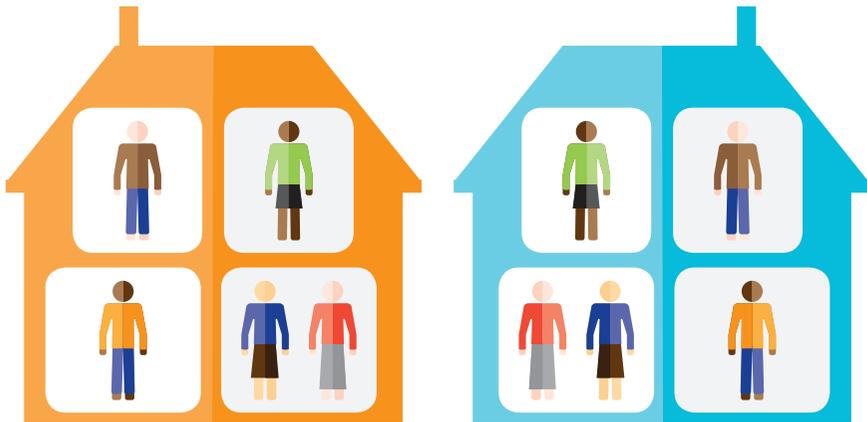
- a** **Option for policy approach**  
Prevent a concentration of HMOS in any area by only allowing a certain percentage of HMOS within a frontage (currently this is 20%).

**+ Potential positive consequences of the approach**  
This option would slow down the increase in the number of HMOS in specific areas where there are already significant numbers.

**- Potential negative/neutral consequences of the approach**  
This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.

### Related options, conclusion

Preferred Option



- b** **Option for policy approach**  
Allow new purpose-built HMOS in appropriate locations.

**+ Potential positive consequences of the approach**  
Purpose-built HMOS could help to reduce some of the potential management issues or neighbourly tensions that can occur because issues such as car and bike parking and bin storage can be integral to the scheme rather than retrofitting an existing building. This approach helps to address the unaffordability issues for people living and working across the city, offering another option to those who would struggle to access housing otherwise.

**- Potential negative/neutral consequences of the approach**  
It is less likely that purpose-built HMOS could be converted to single dwelling houses in the same way as traditional HMOS. It is possible that large purpose-built HMOS will be put forward in locations not suitable for student accommodation, with the intention that they will house students and act like student accommodation.

### Related options, conclusion

Alternative Option

- c Option for policy approach**  
Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.

**+ Potential positive consequences of the approach**  
This approach would acknowledge that the character of some areas is already to have more of a focus on shared housing for students and for young professionals particularly.

**- Potential negative/neutral consequences of the approach**  
It would be difficult to select an area for the concentration. It may lead to difficulties in building and maintaining a strong community, although HMOs do not always mean transient populations.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)

- d Option for policy approach**  
Do not have any restriction on HMOs.

**+ Potential positive consequences of the approach**  
HMOs can be an important part of the housing market; meeting needs of those who can only afford to share but who wish to live in the city. In that sense it can help contribute to a balanced community.

**- Potential negative/neutral consequences of the approach**  
HMOs can lead to pressures on services and streets for example with more bins and parking pressure. Homes do not always have sufficient amenity space for multiple households. HMOs are often a more short-term solution for people, so can create transient populations.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)

## SPECIALIST HOUSING NEED: UNIVERSITY STUDENT ACCOMMODATION

- 2.15 The NPPF requires local planning authorities to plan for the needs of groups with specific housing requirements, including students. The Planning Practice Guidance states that policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on a campus. The PPG recognises that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock.
- 2.16 The City Council recognises that some additional student accommodation should continue to be provided to meet the student accommodation needs of both universities. However, the options recognise that aiming to accommodate all students in purpose-built student accommodation could use up sites better suited to general housing and would undermine the desire to deliver mixed and balanced communities. The policy options set out a strategy for encouraging student accommodation development in the most suitable locations.



## POLICY OPTION SET H9: LOCATION OF NEW STUDENT ACCOMMODATION

- a Option for policy approach**  
Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.

**+ Potential positive consequences of the approach**

This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour.

Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for.

**- Potential negative/neutral consequences of the approach**

Limiting locations does mean institutions may be less able to meet their needs.

Concentrating student accommodations in these areas may mean that district centres and the city centre could be dominated by these accommodation types.

**Related options, conclusion**

Preferred Option

- b Option for policy approach**  
Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.

**+ Potential positive consequences of the approach**

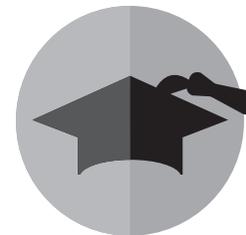
This approach widens the suitable locations for student accommodation and opens more potential sites. However, it still means that students would not be accessing student halls along quieter residential streets.

**- Potential negative/neutral consequences of the approach**

The definition of arterial roads and when a development is 'on' them needs to be clear (i.e. how much of a setback is acceptable, what if the entrance is on a side road?). However, it may mean that arterial roads change in character and become dominated by student accommodation for long stretches. The character of many arterial roads currently is that of quiet residential streets and student accommodation can be reported as having a negative impact on neighbours in these areas.

**Related options, conclusion**

Alternative Option



- c Option for policy approach**  
Have no locational restriction on student accommodation but a criteria-based policy.

**+ Potential positive consequences of the approach**  
This would maximise the opportunity to meet student accommodation needs.

**- Potential negative/neutral consequences of the approach**  
This approach would not help to address the competition between student accommodation and other housing types, potentially creating an imbalance within communities and drawing student accommodation into unsuitable areas.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)

- d Option for policy approach**  
Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

**+ Potential positive consequences of the approach**  
This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit feelings of disruption to communities of student accommodation that are sometimes reported.

**- Potential negative/neutral consequences of the approach**  
This approach would not allow us to meet the requirements of the NPPF because it would not provide for enough student accommodation to come forward to meet the needs. This would mean a greater number of students in private rented accommodation, limiting its availability on the open market for others.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)

## LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

- 2.17 These options propose setting a threshold for the number of students living outside of university provided accommodation before additional academic facilities are permitted. This is a long-standing approach in Oxford to seek to balance the competing demands for sites and homes. The adopted policy which has been successful in ensuring that the universities continue to provide accommodation for most of their students as a core part of their wider development and estate strategies.



## POLICY OPTION SET H10: ENSURING THERE IS ENOUGH STUDENT ACCOMMODATION TO MEET NEEDS GENERATED BY NEW ACADEMIC FACILITIES

### **a** Option for policy approach

Set thresholds for university students living outside of university-provided accommodation and prevent expansion of academic facilities if the threshold is breached. The details of the threshold will include the level set (which would reflect what is achievable) and the types of students it applies to (not all).

The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.

**+ Potential positive consequences of the approach**  
This is a long-standing approach which has been successful in ensuring the universities continue to strive to provide accommodation for most of their students and that this is considered in their wider development plans.

**- Potential negative/neutral consequences of the approach**  
This policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. To be fair and reasonable, this must be related to the development and any related growth in students.

#### **Related options, conclusion**

Preferred Option (in combination with b)

### **b** Option for policy approach

Only permit new academic facilities (of all types proposed by the universities or other institutions) that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option (b) is linked to option (a).

**+ Potential positive consequences of the approach**  
This could also be applied to all academic developments that create a need for student accommodation, not just the universities. It ensures the institutions act responsibly by only undertaking developments that create new capacity for students if they show how they will be accommodated.

**- Potential negative/neutral consequences of the approach**  
This may be difficult to enforce and monitor and will not necessarily be easy to make a judgement about whether a development will create increased demand for accommodation from students. A lot will depend on the submissions of the institutions, and it will be important the policy makes it clear the level of evidence expected.

#### **Related options, conclusion**

Preferred Option (in combination with a)

**C Option for policy approach**

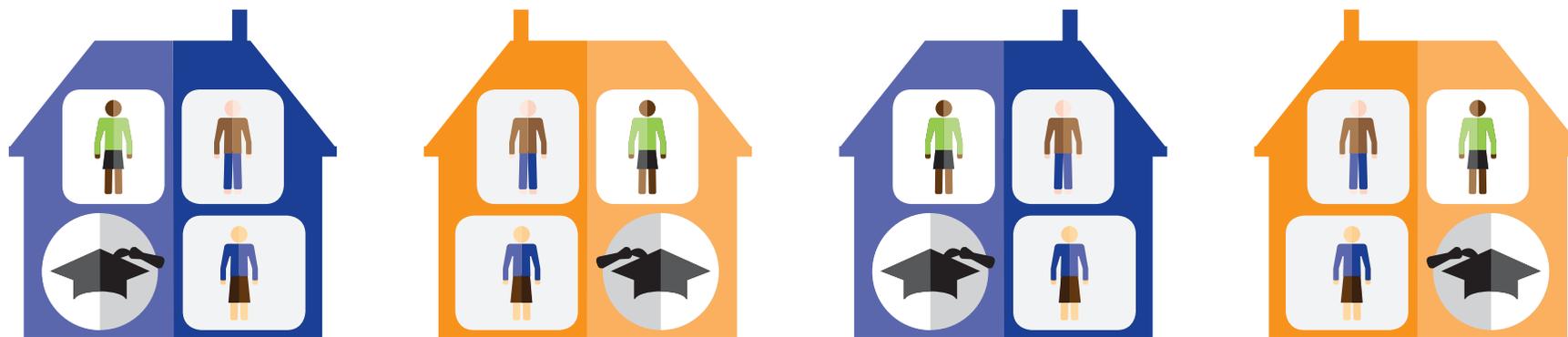
Have no policy linking new academic facilities to student accommodation.

**+ Potential positive consequences of the approach**  
This would mean new institutions could be established in Oxford.

**- Potential negative/neutral consequences of the approach**  
This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.

**Related options, conclusion**

Alternative Option (considered detrimental)



## POLICY OPTION SET H11: MANAGING NEW STUDENT ACCOMMODATION

- a Option for policy approach**  
Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more (with potential to allow other occupiers outside of term-time if a management plan is agreed).

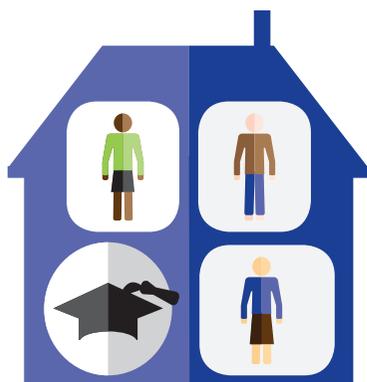
**+ Potential positive consequences of the approach**  
Full time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the non-student market.

Policy flexibility for outside of term time maximise occupation of the developments.

**- Potential negative/neutral consequences of the approach**  
Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.

### Related options, conclusion

Preferred Option (in combination with b)



- b Option for policy approach**  
Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow only operational and disabled parking, with the developer providing a mechanism to prevent residents from parking their cars anywhere on the site, (except for disabled residents).

**+ Potential positive consequences of the approach**  
This supports the policy approach to put downward pressure on parking in the city. The location of new student accommodation will be in sustainable locations with good accessibility to public transport, walking and cycling routes offering a realistic alternative to using a private car.

**- Potential negative/neutral consequences of the approach**  
Will require appropriate monitoring and enforcement and if that is not in place could result in more cars in the city putting parking pressure on adjacent streets.

### Related options, conclusion

Preferred Option (in combination with a)

### **C Option for policy approach**

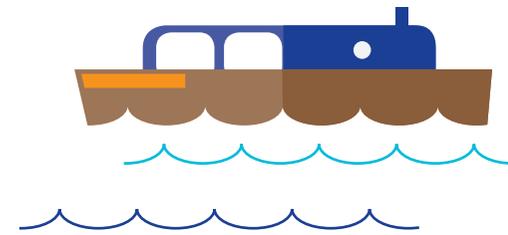
Do not have any management restrictions on new student accommodation.

**+ Potential positive consequences of the approach**  
Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.

**- Potential negative/neutral consequences of the approach**  
Without proper management of student accommodation all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

#### **Related options, conclusion**

Alternative Option (considered detrimental)



### **SPECIALIST HOUSING FOR GYPSY AND TRAVELLERS, BOAT DWELLERS AND OLDER PEOPLE**

2.18 The NPPF requires local planning authorities to plan for the needs of groups with specific housing requirements; these include but are not limited to, those who require affordable housing, families with children, older people, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. Travelling communities, boat dwellers and older people may all have specific accommodation needs. Evidence on the quantity and type of need, was being gathered on an Oxfordshire-wide basis to support the Oxfordshire Plan 2050 and feed into Local Plans, however consideration will have to be given to how this work is now taken forward.



## POLICY OPTION SET H12: GYPSY AND TRAVELLER ACCOMMODATION

- a** **Option for policy approach**  
Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.

**+** **Potential positive consequences of the approach**  
This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.

**-** **Potential negative/neutral consequences of the approach**  
It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.

### Related options, conclusion

Preferred Option

- b** **Option for policy approach**  
Search for sites to allocate to meet an identified need.

**+** **Potential positive consequences of the approach**  
This would ensure any identified needs were met within the city.

**-** **Potential negative/neutral consequences of the approach**  
There is no justification to do this if no need within the city is identified. It might be that Oxford does not have any sites suitable for this use because of its compact urban character.

Could unnecessarily preclude a site from other residential uses.

### Related options, conclusion

Alternative Option

### **C Option for policy approach**

Do not allocate sites or set out policy criteria - default to national policy.

#### **+ Potential positive consequences of the approach**

There may be no need to repeat national policy on this topic in the Local Plan. There would already be general policies of the plan that could be applied in these circumstances (for example on Green Belt).

#### **- Potential negative/neutral consequences of the approach**

In the event of a site coming forward there would not be any policy to help in the assessment of the impact, and there would be no guidance in the plan to suggest where that might go.

#### **Related options, conclusion**

Alternative Option (considered detrimental)

## HOMES FOR BOAT DWELLERS

- 2.19 Residential boats and their dwellers on both permanent and temporary visitor moorings, contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. Much of the boat-dwelling community relies on the existence of residential moorings which are defined as having planning permission for long-term mooring in a fixed location and for occupation as a household's sole or main residence.



## POLICY OPTION SET H13: RESIDENTIAL MOORINGS

- a** **Option for policy approach**  
Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.

**+ Potential positive consequences of the approach**  
Criteria can be developed to ensure that residential moorings have the facilities and services they need to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.

**- Potential negative/neutral consequences of the approach**  
If proposals for residential moorings do not spontaneously come forward, then identified needs for moorings will not be met; this approach is not pro-active in trying to meet this need.

### Related options, conclusion

Preferred Option

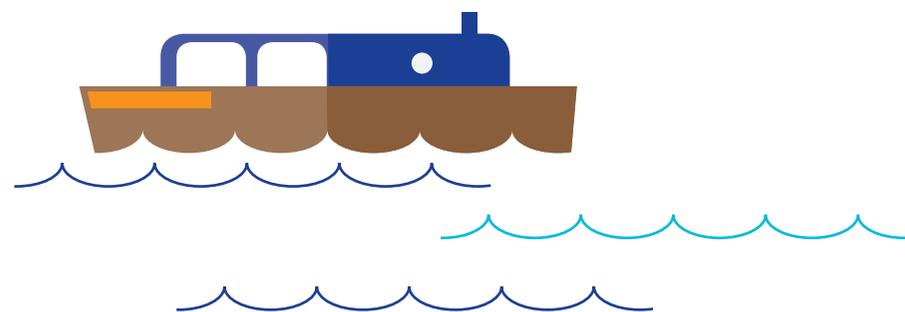
- b** **Option for policy approach**  
Search for a site to allocate for new moorings.

**+ Potential positive consequences of the approach**  
If a site could be found this site would help to ensure identified needs are met. Current site allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.

**- Potential negative/neutral consequences of the approach**  
This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.

### Related options, conclusion

Alternative Option



**C Option for policy approach**  
Do not allocate sites or set out policy criteria.

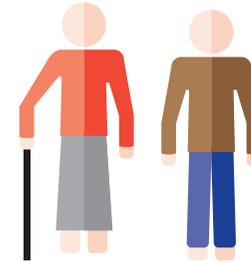
**+ Potential positive consequences of the approach**  
-

**- Potential negative/neutral consequences of the approach**

This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

**Related options, conclusion**

Alternative Option (considered detrimental)



**ELDERLY PERSONS' ACCOMMODATION AND OTHER SPECIALIST HOUSING NEEDS**

2.20 Older people are another identified group in the NPPF with specific housing requirements. Nationally, the population is ageing and whilst within Oxford the age profile of residents can appear to be hidden in the statistics for average age owing to the city's younger demographic, it is important to ensure that the needs of older people are considered. Further work needs to be undertaken to identify the level of need, but it is expected there will be a small need for elderly persons' extra care accommodation and other specialist housing, and this need will be for affordable extra care accommodation.



## POLICY OPTION SET H14: ELDERLY PERSONS' ACCOMMODATION AND OTHER SPECIALIST HOUSING NEEDS

### a Option for policy approach

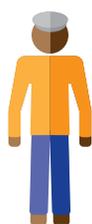
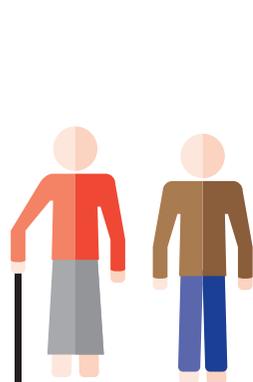
Include a policy that is supportive of elderly persons' accommodation of all types, but with criteria to be met that ensures it provides good quality living accommodation, is in accessible locations and is part of a mixed and balanced community.

**+ Potential positive consequences of the approach**  
This approach ensures elderly persons' accommodation is in the right locations to provide the best quality of life for residents, making sure they have good local access to needed facilities and that they are not isolated and cut off from the wider community.

**- Potential negative/neutral consequences of the approach**  
This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

#### Related options, conclusion

Preferred Option



### b Option for policy approach

Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.

**+ Potential positive consequences of the approach**  
This would maximise the potential for proposals for elderly persons accommodation to come forward.

**- Potential negative/neutral consequences of the approach**  
This would not require elderly persons accommodation so wouldn't necessarily result in its delivery. It could result in accommodation coming forward in unsuitable locations where the residents become or feel isolated.

#### Related options, conclusion

Alternative Option



**c Option for policy approach**  
Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.

- + Potential positive consequences of the approach**  
There are a range of specialist housing needs in the city, which are expected to increase over time. It is not feasible to require a whole site to be used to meet these needs. This approach provides a potential means of delivering housing to meet these needs. This approach would help deliver mixed and balanced communities and meet the widest range of needs.
- Potential negative/neutral consequences of the approach**  
This approach would reduce the amount of regular affordable housing provided to meet the needs of those on the housing list, which is the greatest need in Oxford. The need may still be too great to meet without too much harm to other aims, and it will be difficult to set a justifiable threshold for sites if it is not set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. There is a critical mass of units that are viable to manage, meaning this approach is only likely to work on large sites, the type of which are not found in Oxford; therefore, this need, if identified, may be met on strategic sites just outside the city.

**Related options, conclusion**  
Alternative Option

**d Option for policy approach**  
Include a policy that is restrictive of types of elderly persons' accommodation, private rented flats available to older people but with limited onsite support.

- + Potential positive consequences of the approach**  
This could prevent an imbalance in the type of elderly persons' accommodation, for example a large amount of expensive private accommodation with minimal care on-site.
- Potential negative/neutral consequences of the approach**  
An attempt to restrict elderly persons' accommodation of any type generally is unlikely to be justified or beneficial, as some needs will be met by all types of elderly persons' accommodation. This would also limit opportunities to downsize and free up larger homes to the market.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)

**e Option for policy approach**  
Do not include a policy.

- + Potential positive consequences of the approach**  
This would allow the market to respond to need spontaneously.
- Potential negative/neutral consequences of the approach**  
This would not help to meet the needs of a specific group identified in the NPPF. It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs.

**Related options, conclusion**  
Alternative Option  
(considered detrimental)



## SELF-BUILD AND CUSTOM HOUSEBUILDING

2.21 Self-build and custom housebuilding is one of the elements of the government's approach to increasing housing supply and demand. Oxford City Council has a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in their area in order to build their own home. The requirements of the register are set out in the 'Self-build and Custom Housebuilding (Register) Regulations 2016'. This register informs the level of demand and in the current Oxford Local Plan has guided planning decision making.

## POLICY OPTION SET H15: SELF-BUILD AND CUSTOM HOUSE BUILDING

### **a** Option for policy approach

Require a proportion of the total site area to be available as self-build plots on large sites with a number of proposed plots (for example of over 50 dwellings). If the plots are marketed and there is no sale of these plots after 12 months then dwellings should be built and brought forward in the usual way.

#### **+** Potential positive consequences of the approach

Gives an opportunity for being able to build your own home in a very constrained city or develop community-led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.

#### **-** Potential negative/neutral consequences of the approach

The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet to really be tested so it could be that this does not meet needs or provides more than the level of interest and creates delays in delivery.

Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.

#### **Related options, conclusion**

Preferred Option



**b Option for policy approach**

Require a proportion of the overall number of units to be available as self-build plots for all sites over a smaller size, for example 10 units, with exceptions where this would not work (e.g. only flats, student accommodation).

**+ Potential positive consequences of the approach**  
Gives a greater opportunity for those on the self-build register to gain land to develop their own property.

**- Potential negative/neutral consequences of the approach**  
The more land given to self-build or community-led housing would result in less housing being delivered of other types and tenures.

Very complex to achieve on small sites and could risk the viability of developments.

**Related options, conclusion**

Alternative Option

**c Option for policy approach**

Include a criteria-based policy which is positive towards but not requiring of self-build.

**+ Potential positive consequences of the approach**  
Such a policy approach supports the delivery of other housing beyond self-build and community-led housing which is where there is the greatest need.

**- Potential negative/neutral consequences of the approach**  
Without a specific policy there is potentially limited scope for people to find self-build plots, or for community-led housing schemes to come forward. This is not compliant with the Government's approach, which requires us to meet the need for self-build homes.

**Related options, conclusion**

Alternative Option (considered detrimental)

## POLICY OPTION SET H16: COMMUNITY-LED HOUSING

- a** **Option for policy approach**  
Include a policy that is generally supportive of community-led housing but does not have any requirements.

**+ Potential positive consequences of the approach**  
Gives an opportunity for being able to build your own home in a very constrained city, or develop community-led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.

**- Potential negative/neutral consequences of the approach**  
The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet to really be tested so it could be that this does not meet needs or provides more than the level of interest and creates delays in delivery. How affordable housing is calculated when there is a proportion of the plot rather than numbers required will need to be clear in the policy.

Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.

### Related options, conclusion

Preferred Option

- b** **Option for policy approach**  
Require a proportion of the total site area to be available to groups wishing to develop community-led housing (for example of over 50 dwellings).

**+ Potential positive consequences of the approach**  
Gives a greater opportunity for those of the self-build register, or community-led housing groups, to gain land to develop their own property.

**- Potential negative/neutral consequences of the approach**  
More land given to community-led housing would result in less housing being delivered of other types and tenures.

Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any requirement for self-build could lead to a significant decrease in the delivery of other housing types for which there is a greater need, including all tenures of affordable housing.

### Related options, conclusion

Alternative Option

- c Option for policy approach**  
Encourage delivery of community-led housing by relaxing some requirements of the Plan for this housing type, for example internal and/or external space standards.

- + Potential positive consequences of the approach**  
This could encourage efficient use of land by sharing of facilities and could help encourage strong communities, with a range of housing opportunities for all stages of life.

- Potential negative/neutral consequences of the approach**  
Any standards introduced for internal or external space are in order to ensure a good living environment, and the justification for that would not change if there were some shared facilities nearby.

**Related options, conclusion**

Alternative Option

- d Option for policy approach**  
Include a criteria-based policy which is positive towards but not requiring of community-led.

- + Potential positive consequences of the approach**  
Such a policy approach supports the delivery of other housing beyond self-build and community-led housing which is where there is the greatest need.

- Potential negative/neutral consequences of the approach**  
Without a specific policy there is potentially limited scope for people to find self-build plots, or for community-led housing schemes to come forward. This is not compliant with the Government's approach, which requires us to meet the need for self-build homes.

**Related options, conclusion**

Alternative Option (considered detrimental)

