

Background paper 001

Title: Housing Need, Requirement and mix

This paper addresses the overall need for housing in oxford, how the housing requirement may differ from this and the mix of unit sizes needed.
Relevant Local Plan 2042 Objectives: <ul style="list-style-type: none">• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible.• Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): <p>4. To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home.</p>
SEA theme(s): Material assets and population.

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1. Introduction

- 1.1 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. Oxford is an international city and important part of the knowledge economy, with a world-renowned university and hospitals. In addition, the mix of housing sizes also needs to be considered, as some will need smaller (1-bed) units and others larger homes to accommodate a large family. How to manage particular housing types such as Houses in Multiple Occupation (HMOs) is also important. This paper focuses on overall housing need and mix. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily. Meeting the needs of those in high housing need, or those who may struggle to afford to remain in the city, is also important to meet social objectives such as overcoming inequalities and improving health and wellbeing. Affordable Housing is considered in Background Paper 002. Particular groups have particular housing needs, including students, those who need extra care, gypsy, traveller and boaters. Specialist housing need is considered in Background Paper 003.
- 1.2 This topic paper begins with a review of the national, regional and local policy context relating to housing need and requirement. It then goes on to look at the current situation in Oxford and includes a discussion on housing need and Oxford's housing target. The "current situation" section then moves on to discuss housing supply. The next section talks about the likely future without a new local plan, and discusses housing supply and the competing pressures for limited land available in the city. Finally, some key sustainability and plan issues are drawn out the paper.

- 1.3 Historically Oxford has been unable to meet its calculated housing need. The last round of Local Plan's in Oxfordshire aimed to meet the needs assessed in the 2014 Oxfordshire Housing Market Assessment, updated for Oxford in 2018. Oxford's total capacity for housing was less than its calculated need. So unmet need was taken by the other districts' local plans (full details are set out within this paper).
- 1.4 Oxford's capacity for housing is estimated in the Housing and Employment Land Availability Assessment 2023, and this shows that Oxford's total capacity for housing was less than its calculated need. Further capacity work will be undertaken for Oxford this year, to identify its current capacity.
- 1.5 It is important that a range of market and affordable housing types are available to meet a wide range of needs. Evidence will be required to demonstrate what these housing types are, which will then help shape a policy on housing mix which takes into account an assessment of the need, market demand, design considerations, viability and housing register. These issues will also need to be addressed at the planning application stage of any proposed new development, which will have an impact on the overall housing mix coming forward.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

- 2.1 The National Planning Policy Framework ([NPPF](#)) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance. The NPPF also considers that the needs of groups with specific housing requirements are addressed. Paragraph 63 provides an indication of those groups which includes, older persons, students and gypsies and travellers. Paragraph 69 sets out that a housing figure for the whole local authority area should be included by strategic policy making authorities and Paragraphs 72-77 provide the national policy position on identifying land for homes. Paragraphs 78-81 discuss how strategic policy making authorities should maintain the supply and delivery of new homes.
- 2.2 The National Planning Policy Framework (NPPF) (2024) 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.

National Planning Practice Guidance (PPG)

2.3 The National Planning Practice Guidance (PPG) includes additional guidance on the following housing topics relevant to housing need and supply:

- Housing and economic land availability assessment;
- Housing and economic needs assessment;
- Housing needs of different groups;
- Housing needs for older and disabled people;
- Housing supply and delivery.

2.4 The PPG re-iterates the expectation for strategic policy-making authorities to follow the standard method for calculating housing need (Paragraph: 002 Reference ID: 2a-002-20241212). This explains that the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. This is intended as an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this assessment does not produce the housing requirement figure.

2.5 The PPG goes on to explain the housing requirement (040 Reference ID: 2a-040-20241212). The PPG says that, once the need is calculated using the standard method, the planning authority should make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

2.6 The PPG also provides advice about assessing land availability within the boundaries of a plan-making authority including setting out the purpose of this assessment. Paragraph 001 Reference ID: 3-001- 20190722 of the PPG sets out that "An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period." In relation to whether or not a site should be allocated, the PPG sets out that the role of the land availability assessment is to provide information on the range of sites which are available to meet the local authority's requirements but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

Regional and Local Context

Oxfordshire Housing and Growth Deal

2.7 The Oxfordshire Housing and Growth Deal supports the delivery of 100,000 homes in Oxfordshire between 2011 and 2031 and secured £215million of funding including £60million for affordable housing and £150million for infrastructure improvements including

for road and rail. As part of this deal, there was a commitment to produce a county-wide strategic plan. For this reason, work began on the Oxfordshire Plan 2050, which was to provide high-level strategy to inform the districts' local plan, including on housing need and the housing requirement for each district. However, work on this plan was eventually aborted by the constituent authorities.

Neighbouring Local Plans

- 2.8 In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of housing need identified in the 2014 Strategic Housing Market Assessment (SHMA) due to the constrained nature of Oxford. Oxford's need was assessed as a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). The approach taken by the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) was that the mid-point of this range should be taken as the starting point for assessing the level of need and unmet need (i.e. 28,000). Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. The assumed capacity for Oxford was 10,000 dwellings.
- 2.9 In the last round of Local Plans, the other Oxfordshire districts agreed to deliver 14,300 dwellings, which met the majority of unmet need arising from Oxford's Local Plan 2036. These were apportioned as follows:

Table 2.1

Cherwell Local Plan	4,400
South Oxfordshire	4,950
Vale of White Horse	2,200
West Oxfordshire Local Plan	2,750

- 2.10 Originally, the intention for the next round of local plans was that housing need and requirements would be informed by the Oxfordshire Plan 2050. The Oxfordshire Growth Needs Assessment was undertaken, agreed and published, and initial work on the Oxfordshire Plan 2050 consulted on. This had not yet got to the point of developing a strategy to use to apportion the need between the districts. Further work to update the OGNA was commissioned, but agreement on this work could not be reached, and work on the Oxfordshire Plan ceased. Work had commenced on the Oxford Local Plan 2040, and to enable this to continue, Oxford, with Cherwell, commissioned a Housing and Economic Needs Assessment to inform the housing need of those two authorities. The Oxford Local Plan 2040 was submitted for examination on this basis, but the Inspectors concluded that the duty to cooperate had not been met because the HENA looked at the whole of Oxfordshire in order to establish the housing need of the two authorities.

2.11 Work has continued on local plans in each Oxfordshire district. Before the base-dates of these plans, unmet need for Oxford had not come forward. Negotiations and joint working have been on-going to ensure strategic sites deliver for Oxford's unmet need, including by ensuring there are nomination rights for the affordable housing, so it meets the needs of those on Oxford's housing list. The following table shows the amount of Oxford's unmet need incorporated into the draft plans of our neighbouring districts (latest position as at January 2025).

Table 2.2

District	Plan and Stage	Total housing for Oxford's unmet need proposing to add to requirement	Years requirement to be applied to
Cherwell District Council	Cherwell Local Plan Review 2042 Regulation 19 consultation taken place	4,400	2020-2042
Vale of White Horse District Council	South and Vale Joint Local Plan 2041-submitted	1,830	2021-2031
South Oxfordshire District Council	South and Vale Joint Local Plan 2041-submitted	4,950	2021-2035
West Oxfordshire District Council	Local Plan 2031 and Salt Cross AAP (examination re-opened to look at zero-carbon policy, following legal challenge).	2,750	To 2031

Oxford Local Plan 2036

2.12 The Oxford Local Plan 2036 contains a number of policies relating to housing need and supply. In particular Policy H1 sets the housing requirement for the plan period. The housing requirement for the plan period from 2016-2036 is 10,884 homes, which is a stepped trajectory to reflect the anticipated delivery of housing over the plan period. The housing requirement in the Oxford Local Plan 2036 is as follows:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

- 2.13 Policy H4 sets the mix of dwelling sizes. This applies only to affordable housing. For market housing, an explanation of the proposed housing mix is required. There are exceptions to the policy requirement for affordable housing, for example in the city and district centres, where density may be high and only smaller units are suitable.

Housing and Economic Land Availability Assessment

- 2.14 This is a constraint-based assessment that seeks to identify sites and broad locations and assesses their development potential. The assessment looks at whether sites and broad locations for development have the potential to come forward as part of the development plan process. (i.e., are sites or broad locations for development available and achievable?) The most recent one carried out for Oxford was to support the Oxford Local Plan 2040 and was completed in September 2023, with an addendum completed in March 2024. This showed the capacity of Oxford to be 9,851 for the period 2020-2040, which is an average of 493 dwellings per annum. This will be updated to support the Oxford Local Plan 2042.

Oxford City Council “Our Strategy” 2024-2028

- 2.15 One of the five main priorities of the City Council’s strategy to 2024 is to deliver ‘good, affordable homes’. The strategy recognises that ‘To address Oxford’s housing issues we must drive up standards for existing housing alongside a focus on providing new homes, working in partnership across the housing sector.’

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Need

- 3.1 In national planning policy, an area’s housing need is different from the housing requirement. The NPPF December 2024 makes it clear that the assessment of housing need should be generated using the Government’s Standard Method. The standard method is used to identify an annual housing need figure. The standard method housing need calculation for Oxford City calculated in December 2024 is 1,087 dwellings per year.

Housing Requirement

- 3.2 The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method. It also recognises that there may be unmet need, if the housing need is greater than the number of homes that can realistically be delivered within the plan period within the planning authority’s area. This is the case in Oxford as the housing need is significantly greater than the capacity of the city.
- 3.3 There are very significant constraints on the capacity of the city – physically with the city’s tight administrative boundary and Green Belt, and environmentally with large areas of national and international biodiversity interests and areas within flood zone 3b functional flood zone as well as heritage and townscape considerations. Oxford’s housing requirement

is therefore a constrained and capacity-based target. The Inspector for the Oxford Local Plan 2036 acknowledged in his report that Oxford's housing requirement was only a proportion of the total number of homes that made up the total housing need.

- 3.4 The current housing requirement, as set in the adopted Local Plan 2036, is 10,884 homes for the period 2016-2036. Policy H1 provides a stepped trajectory to reflect changes in anticipated delivery over the plan period:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

- 3.5 Oxford's physical and environmental constraints on its capacity for growth are not new issues and through the joint working undertaken as part of the Growth Board, an element of Oxford's unmet need was apportioned to the surrounding Oxfordshire district councils to accommodate within their administrative areas as part of the Duty to Cooperate process. This led to strategic allocations for growth in plans for all of the Oxfordshire district authorities most recent Local Plans.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Supply

- 4.1 Oxford's constrained capacity for housing land has traditionally meant that there is strong competition for land for housing, student accommodation, employment and other uses. In order to help address the supply of housing, the strategy for the Oxford Local Plan 2036 was housing-focused and prioritised delivery of homes. The strategy sought to allocate no new employment sites, instead prioritising the loss of certain low quality, poorly located employment sites (category 3 employment sites) for housing. Notwithstanding this approach, there is continued pressure on infrastructure as a large proportion of housing developments are on small-scale infill sites and offer limited opportunities to deliver new on-site strategic infrastructure. This has been exacerbated by changes to national policy in recent years which include permitted development for residential conversions from other uses including offices and shops. Such changes of use are not subject to the same planning considerations in relation to supporting infrastructure to support the new homes formed.
- 4.2 Work with the other Oxfordshire authorities has resulted in a number of strategic allocations being made in the plans of our neighbours to help meet housing need. Other actions by the City Council to deliver housing, such as setting up a housing company and setting affordable housing delivery as a corporate priority, will continue to push forward housing delivery.

Housing Completions

- 4.3 Since 2006, the majority of new homes have been delivered on small-scale, dispersed brownfield sites, either re-developing existing units or converting existing buildings. The

city's last remaining strategic greenfield sites are Barton Park and Oxford North. For the last few years, annual delivery at Barton Park has made a significant contribution to housing delivery, and more recently housing has begun to be delivered at Oxford North.

- 4.4 Table 4.1 shows the net additional completions from 2016/17 (the base date of the 2016 Local Plan) which is taken from the 2023/24 Annual Monitoring Report published in December 2024. This takes into account dwellings gained and lost through new build completions, demolitions, changes of use and conversions and includes completions of purpose built student accommodation.

Table 4.1 - Showing net additional completions since 2016 (Oxford City Council 2024)

Year	Dwellings (net) completed (built)
2016/17	419
2017/18	367
2018/19	358
2019/20	790
2020/21	711
2021/22	581
2022/23	554
2023/24	365
TOTAL (since 2006/07)	5,848
TOTAL (since 2016/17)	1,918

- 4.5 In the 23/24 monitoring year there were 365 recorded completions which represents a decrease compared to recent years. This follows a decrease in 21/22 and 22/23 compared to 19/20 and 20/21. This is reflective of both the lack of new large strategic sites, and also wider economic circumstances, including uncertainties from Brexit and the global economic situation (affected by Covid, the Ukraine war and other globally significant effects), and the lack recently of large student accommodation schemes. Changed economic circumstances have also tipped the balance towards delivery of economic development, particularly research and development, rather than housing, which has resulted in fewer conversions from economic sites to housing.
- 4.6 Likely trends without the plan include continued residential completions from a variety of sources including from Oxford City Housing Limited.

5. Options for Local Plan 2042 Policies

- 5.1** The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 will need to take account of the need to provide new homes, of the right sizes. To ensure the situation is not made worse, the loss of dwellings should also be managed.

5.2 The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Housing requirement
- Housing mix
- Loss of dwellings,

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 001a (draft Policy H1): Housing requirement

5.5 The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need. It is important that the overall housing need is fully understood, in order to be able to plan to meet that need. The NPPF is clear that the housing requirement set in the local plan may be different to the housing need identified by the Standard Method. The strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

5.6 This means that there are not really options for calculating housing need. The housing need for Oxford calculated by the Standard Method introduced in December 2024 is currently 1,087. That means that the housing need over the 20-year plan period 2022-2042 is currently 21,740.

5.7 However, there are different potential options for the housing requirement set out in the Local Plan. The housing requirement is what it is expected will be delivered each year. The housing land supply will be calculated using this figure, and it will be used as the target for the Housing Delivery Test. The NPPF sets out that the requirement may be higher than the identified housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment

Table 5.1 - Policy options set 001a: Housing requirement for the plan period

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
<p>Option a Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).</p>	<p>The NPPF says that local plans should aim to meet identified need. Meeting housing need in full would help reduce social problems such as overcrowding and homelessness, as well as problems employers have attracting staff. It may help improve affordability. Meeting housing need within the city may help communities stay together.</p>	<p>It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 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 at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable.</p>
<p>Option b Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with</p>	<p>The 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.</p>	<p>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. If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.</p>

the spatial strategy (c.9,800 dwellings over the Plan period 2022-2042).		
Option c Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.	The Standard Method need calculation is based on existing housing stock with an affordability uplift applied. It does not, therefore, necessarily take account of the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.	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. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a or b or c High-level screening conclusion? -the options should be subject to detailed appraisal. Screened in for detailed appraisal? - Yes

Rationale: These options are about the housing requirement that is determined should form the basis of the Local Plan. The housing requirement may differ from housing need, which is calculated using the Standard Method. The NPPF states the housing requirement may exceed the housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment. There are growth ambitions for Oxford, but there is also limited capacity. Reflecting these growth ambitions through an increased housing requirement would only lead to a greater level of unmet housing need, which could not be met in Oxford anyway. Setting the housing requirement at the level of the Standard Method need calculation would mean that many other aims and ambitions would need to be compromised, and it is likely would still be unachievable. The housing requirement may also be lower than the need in order to reflect those constraints on capacity (option b).

In terms of sustainability impacts, the most relevant SA criteria are **criterion 4 local housing needs** and **criterion 12, to achieve sustainable economic growth**. However, there is potential for indirect impacts on a broad range of criteria, if the strategy is to attempt to meet housing needs, which would compromise other objectives. Delivery of housing is essential to meet local housing needs, and indicators suggest there are many negative impacts in Oxford from a severe lack of suitable, affordable homes. Housing is also necessary to sustainably support economic growth. There is, therefore, potential for significant impacts from these options and they should be taken forward for further appraisal.

Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms)

- 5.8 The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. There are a range of considerations in setting a mix, including that some sites and locations will be more suitable for different types of dwelling, and that needs may change over time. Ensuring a range of units sizes is available will be key to meeting a range of needs. The mix could be defined by number of bedrooms or bedspaces.

Table 5.2 - Policy options set 001b: Mix of dwelling sizes (no. bedrooms)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a policy mix to ensure a	It is important that there is a housing mix where possible to meet a wide range of demand. The affordable housing mix will	A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if

range of sizes of unit for affordable housing only (this would apply to all tenures except the market housing).	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.	there was no requirement for large units, or the local context may be more suited.
Exclude certain areas or types of development from any set mix where they would benefit from greater flexibility. For example exclude smaller sites where there is less opportunity to create a mix, avoid high density areas such as the district centres as they are suitable for small units to further increase density, do not apply to employer-linked housing as there	This ensures that where a mix is most suitable it will bring benefits of ensuring a range of units to meet a range of needs, but where it is not relevant or beneficial there is greater flexibility.	Depending on the exclusions, this may significantly reduce the number of sites where a set mix is required, which could affect the availability of a range of sizes over time.

will be specific needs linked to the staff.		
Option b Set a mix for both market and affordable homes and on a broad range of sites, for example including all those over 10 units.	This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.	This would not allow for a flexible response to the market, to changing needs in an area, or the context of a site. This 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. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example.
Option c 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.	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.	This level of flexibility in the policy requirement could be met by 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.
Option d Do not specify a mix but require the mix to	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	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

respond to the Housing Register and therefore identified needs.	informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.	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.
Option e Do not include a mix policy.	Provides complete flexibility.	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.

Initial sustainability appraisal screening of options sets	
<p>Is there only one option or are there various options we could take? - various combinations (e.g. either a, c, d, e or a+b or a+c).</p> <p>High-level screening conclusion? - the options are similar to each other from a sustainability perspective</p> <p>Screened in for detailed appraisal? - No</p> <p>Rationale: There is no specific national requirement for a policy although it is indirectly important to helping meet NPPF requirement and there is local context which supports the inclusion of some sort of locally prescribed approach although various constraints in Oxford lead to several potential options for how best to formulate a policy. Options a and c represent different levels of scope over which to apply a mix requirement (applying just to affordable element or market provision too), meanwhile options d and e represent different ways to influence mix without having such a broad mix specification as is presented in options a and c. Option e is simply to not set a local policy in relation to housing mix and could be considered as another different option. Option b is more of an additional dimension to specifying a housing mix policy and could be incorporated alongside either option a or c.</p> <p>Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, most directly, this would be criterion 4. Local Housing Needs because of how they influence the balance of dwelling sizes that could come forward and help to meet needs of different groups in the community. Indirectly, the options also have impacts that relate to</p>	

criterion 5. Inequalities, with some of them influencing the mix within the affordable housing element which will help to cater for those who have more difficulty accessing affordable housing, as well as **criterion 3. Efficient Use of Land** (because mix can influence how many dwelling on a site) and **criterion 11. Urban design** (influencing housing mix can influence an applicant's ability to reflect local context).

Between the options, the level of sustainability impact is unlikely to vary significantly, with each of the option a, c, d or e likely having a minor positive impact for SA criteria 4. and 5. and minor negative for criteria 3. and 11. There is a potentially more positive and more negative impact in option c that addresses both market and affordable, with these impacts decreasing towards neutral across option a and then options d and c. Option e of not having a policy would likely be a neutral impact in terms of sustainability impacts. Overall, the extent of sustainability impacts is not considered to be significant for any of the criteria regardless of option and the relevant SA criteria that the impacts relate to themselves do not differ significantly between the options, so it is not considered necessary to scope in for detailed assessment.

Policy options set 001c (draft policy H8): Loss of dwellings

- 5.9 Given the scale of housing need in Oxford, it is important to ensure that the existing stock is protected otherwise the benefits of delivering new housing would be undermined. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from family homes or from the longer term private rented sector. There are a range of considerations in setting an approach however the lack of available land and sites can constrain development of other facilities needed to support the local community. Future legislation may help us to control changes of use to short term lets.

Table 5.3 - Policy options set 001c: Loss of dwellings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Resist a net loss of dwellings except for specific reasons.	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	The loss of dwellings undermines the benefits of building a mix of new homes.

	existing community uses in the area.	
Option b Resist the subdivision of family homes.	Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.	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
Option c Have no restrictions on the loss of dwellings.	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.	Losing control over the existing supply of housing stock would undermine the benefits of bringing forward housing in new development to meet the population's current and future needs (objectively assessed need).

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? – various options/combinations (option a, b, or c or a combination of options a and b).

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale:

In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Option a seeks to prevent the loss of homes unless their loss would provide or bring improved benefit to the local community. Option b seeks to specifically prevent the subdivision of family homes to help ensure that the mix of homes available includes those suitable for families. Option c is to not set any restrictions at all via the Local Plan. Option a or b could be carried forward on their own or combined with each other.

In terms of sustainability impacts, the different options all relate primarily to **criterion 4. Housing Need, criterion 6 Essential services and criterion 11 Urban design**. Options a and b are likely to have more positive impacts against criterion 4. Option

c could potentially place a greater demand on local services, having the potential to have a negative impact on criterion 6. Option c could also potentially lead to more of a negative impact against criterion 4 as the populations' current and future housing needs are not able to be met and also criterion 11 as the character of the neighbourhood could change as demand for local services could change. Overall, the sustainability impacts do not differ significantly between the options and it is not considered necessary for detailed appraisal.

6. Conclusions including preferred approaches for Local Plan 2042

- 6.1 In Oxford, the high cost of housing and limited availability of housing has a big social and economic impact. As of 2018/19, it was reported that **26% of children** in the city live in poverty, once housing costs have been taken into account. Availability of sufficient and affordable housing can help reduce poverty and is important to overcoming inequalities in the city. Availability of affordable housing is also important to employers, enabling them to attract and retain staff. Businesses may struggle if they cannot attract or retain staff, and other employers and services such as education, public transport and healthcare may struggle to run without sufficient staff, which would also have negative social and economic impacts.

Key sustainability issues for the Local Plan to address:

- 6.2 Local Housing Needs:

- Oxford has limited capacity to deliver new homes within its boundary and has often been unable to meet housing need in full without support from neighbouring authorities
- Implications of wider economic circumstances on housing delivery likely to see continued suppression of housing delivery.

- 6.3 Inequalities:

- The plan should address how the supply of new housing can meet the needs of particular demographics.

- 6.4 Urban Design:

- Housing, of various types, needs to be appropriately located, considering amenity of existing neighbours, and suitability for new proposed residents.

- 6.5 Essential Services:

- A continued reliance on smaller sites is likely to increase pressure on existing infrastructure

Preferred approaches for the Local Plan 2042

- 6.6 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address housing need, requirement and mix. Under each of the

topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Housing Requirement – Draft policy H1

- 6.7 The preferred approach for the Local Plan 2042 is to have a local policy that sets the total housing requirement over the plan period, and annualised. The housing requirement could be based on the identified need, or could exceed it in order to support a greater level of economic growth. However, the preferred approach is to base the housing requirement on the housing capacity. This is to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would certainly mean that pressure would be placed on other policies aiming to meet the Plan's strategy, such as in relation to green infrastructure .
- 6.8 The options set was tested through the Sustainability Appraisal with Option B performing better in balancing positive and negative impacts. Option B scored positively for meeting housing needs and economic growth because it makes an important contribution to housing need and was more positively scoring compared with the other options in relation to objective 10 (biodiversity), 11 (heritage), 9 (water), 7 (adequate Green Infrastructure) and 2 (resilience to climate change). This is because the capacity-based target can take account of these other considerations. Whereas if the aim was to meet the need above the identified capacity, as in the case of Options A and C, whilst these options do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan.
- 6.9 This means **option B** is proposed as the preferred approach.

Mix of housing sizes – Draft policy H6

- 6.10 The preferred approach for the Local Plan 2042 to have a local policy that sets a mix of housing sizes in certain circumstances, but for many schemes requires the chosen mix to be justified and explained, but does not set a specified mix. The proposed mix applies only to affordable housing, and excludes the types of schemes where the mix would be difficult to achieve, or conflict with other aims, such as in flats in the city centre or district centres where delivery of only one or two bedroom units helps to achieve density aims and may be more fitting to the infill development often appropriate in these locations.
- 6.11 Whilst either of the four options, option A, B, C or D or various combinations of these could be taken forward, the preferred approach is a combination of **Options A and B** which ensures a mix of affordable home sizes to meet needs over the plan period,

requires justification of the selected mix, and provides flexibility to respond to site-specific needs and changing circumstances.

Development involving Loss of dwellings – Draft policy H8

- 6.12 The preferred approach for the Local Plan 2042 policy is to have a local policy that addresses the protection of existing housing stock. This will help to relieve pressure on the use of dwellings that are of a suitable size for families and assist with the management of demand for residential units to be subdivided or converted or be brought into use as short term lets.
- 6.13 This means either **option A or B**, or a combination of both option A and option B could be taken forward. Option A will help ensure that homes are not lost unless their loss would provide or bring improved benefit to the local community. Option B will help prevent the subdivision of homes and ensure that the mix of homes includes homes that are suitable for families.