Background paper 003

Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.

This paper addresses Oxford's circumstances in relation to specialist housing provision including the provision of student accommodation, self build housing, housing for elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.
Relevant Local Plan Objective(s): • Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home. 5. To reduce poverty, social exclusion, and health inequalities.
SEA theme(s): Soil, Material Assets, Biodiversity, Population, Human Health, Cultural Heritage and Landscape.

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1. Introduction

1.1   This Paper considers the need for and policy response to various types of specialist housing accommodation. The global housing need is considered in BGP1, but in addition we are required to consider the needs for particular types of housing and occupants. Affordable housing need is discussed in BGP2. This paper focuses on student accommodation, self-

build and custom build homes, elderly persons and other supported care housing, gypsy, traveller and travelling showpeople, and boat dwellers.

Student Accommodation

1.2   There are two higher education institutions within Oxford – University of Oxford and Oxford Brookes University. Provision of good quality, well managed student accommodation will be required, located in close proximity to those institutions.

Self-Build and Custom Housebuilding

1.3   Oxford's communities are varied, with differing needs for housing provision. With affordability issues, self-build and custom housebuilding can provide opportunity for individuals and groups to access the housing market a different way.

Elderly persons and other supported care housing

1.4   There are various types of supported housing, mainly provided for elderly persons, but also for others with specialist housing and additional care needs.

Gypsy, Traveller and Travelling Showpeople

1.5   The Traveller community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans. Current and future accommodation needs for travelling communities were last assessed in 2024 at an Oxfordshire-wide level.

Boat Dwellers

1.6   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.

Boarding School Accommodation

1.7   Oxford is home to several boarding schools which provide accommodation for their students.

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

National Plans, Policies and Programmes

National Planning Policy Framework and Planning Practice Guidance

2.1   The National Planning Policy Framework (NPPF) makes it clear that to support the Government's objective of significantly boosting the supply of home, planning authorities should address the needs of groups with specific housing requirements and that policies should be informed by a local housing need assessment. At paragraph 63, the NPPF states *'Within the context of establishing need, the size, type and tenure of housing needed for*

different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'

Student Accommodation

2.2 Paragraph 04 (reference ID 67-004-20190722) of the Housing Needs of Different Groups Planning Practice Guidance (PPG) published in July 2019 and updated in May 2021 states "Strategic 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 campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."

2.3 Paragraph: 025 (reference ID: 68-034-20190722) of the Housing supply and delivery guidance published in July 2019 and updated in December 2024, allows for student accommodation to contribute towards an authority's housing land supply based upon the amount of accommodation it releases in the wider the wider housing market.

Self-Build and Custom Housebuilding

2.4 The Self-Build and Custom Housing Building Act 2015 (as amended by the Housing and Planning Act 2016) defines Self-build and Custom Housebuilding as *"the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person".*

2.5 The Council is required to keep a register of individuals and groups of individuals who are seeking to acquire serviced plots of land in their area to build homes for those individuals to occupy. The Act requires relevant authorities to "*keep a register of a) individuals, and b) associations of individuals, who are seeking to acquire services plots of land in the authority's area for their own self-build and custom housebuilding".* The requirements of the register are set out in the Self-build and Custom Housebuilding (Register) Regulations 2016*.* The Act also requires relevant authorities to publicise its register.

Elderly persons accommodation

2.6   *The PPG explains that* 'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.' (Paragraph: 001 Reference ID: 63-001-20190626).

Gypsy, Traveller and Travelling Showpeople

2.7   The Planning policy for traveller sites was last updated in December 2024. A key update was to the definition of "gypsies and travellers" clarifying that persons of nomadic habit of life, including those with a cultural tradition of nomadism or of living in a caravan are included within the definition. Paragraph 2 states that this document *"is a material consideration in planning decisions"*, whilst paragraph 3 specifies *"that, the Government's overarching aim is to ensure fair and equal treatment for travellers",* whilst also respecting the interests of the settled community. To help achieve this, the Government expects local planning authorities to make their own assessment of need and to plan for sites over a reasonable timescale.

Boat dwellers

2.8   The Housing and Planning Act 2016 (section 124) creates a duty under section 8 of the Housing Act 1985 to consider the needs of people residing in or resorting to a local authority area with respect to sites for caravans and the mooring of houseboats as part of the periodical review of housing needs. It deletes sections 225 and 226 of the Housing Act 2004.

Boarding School Accommodation

2.9   There are no national plans/policies or programmes relating to boarding school accommodation.

Regional and Local Plans, Policies and Programmes

Student accommodation needs assessment

2.10 The Oxford Student Needs Assessment (2023, Iceni), is a technical report which draws together various bits of data, including the profile of students in the city and the existing student accommodation profile of the two universities, including their future expansion plans. This is considered against the local context of Oxford where there is a significantly constrained land supply, with different forms of development competing against one another. The report makes some recommendations as to how the relevant policies in the Oxford Local Plan 2036 should evolve. These currently set out where new student accommodation can be located and as well as how many full-time taught course students can live outside of non-university provided accommodation.

2.11 The assessment concludes that it is for the Council to assess what its priorities are – that it is important to strike the right balance between restricting the location of new student accommodation, whilst considering the important economic role that the universities play in supporting Oxford's wider economy, the potential land available for development, and the alternative pressures for other forms of housing on the land available. It is recognised that without the thresholds in place, there is the potential for a growth in students to live in the wider housing market, including HMOs. This could put pressure on the private rental sector (particularly at the lower cost end) and could fuel rental growth. In turn, this could well reduce the ability of this sector to house lower income households, and result in increased levels of homelessness. However, if thresholds are to be set, regard should be had to the evidence in this assessment, but also to the available land supply and choices as to what the land is allocated for.

Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment

2.12 The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (2024, arc[4]) was undertaken on behalf of the city and all district authorities within Oxfordshire. It sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42 and establishes that Oxford City has a need of 0 for Gypsy and Traveller pitches and Travelling Showperson yards. However, the assessment does recommend that a criteria-based policy is included in any emerging plan for Oxford, as it provides a framework for assessing planning applications for these types of specialist housing. The assessment also clearly expresses that gypsies and travellers have different requirements from travelling showpeople and that this should be reflected in the criteria-based policy.

2.13 Paragraph 9.30 of the assessment notes that, *"the analysis of houseboat need would suggest there is additional need for residential moorings across waterways in Oxfordshire although there are complex dynamics relating to households living on waterways and accessibility to moorings. The principal location of residential moorings is in Oxford City."* Feedback from boat dwellers and stakeholders suggests that a range of 20-50 additional moorings should be made available, *"therefore, the current figure of 41 in the Oxford Local Plan 2036 as an expression of need remains appropriate."* (No specific needs for boat dwellers were identified in any of the district authorities.)

Specialist and Supported Housing Needs Assessment

2.14 Oxfordshire County Council has published a Specialist and Supported Housing Needs Assessment (2024, Housing LIN), which sets out the need for the various types of specialist and supported housing across Oxfordshire, broken down by district and over the next 10-20 years. This starts with background about the demographic profile and projections for each district. Oxford has a significantly younger age profile than the other districts, with significantly less growth of the elderly population expected. Nevertheless, there is still a need for additional accommodation over the plan period.

2.15 The study identifies a need in Oxford to 2044 of 1,030 additional retirement/sheltered homes (420 social/affordable rent, 100 shared ownership, 510 market). It identifies a need for 320 extra care units (145 social/affordable rent, 150 market and 25 shared ownership). The total need for housing to support those with autism or learning difficulties is 176 to 2039 and mental health related needs 287 (8% of the Oxfordshire because of the very significant concentration of existing provision within the city).

Oxford Local Plan 2036

Student Accommodation

2.16 The Oxford Local Plan 2036 (OLP2036), adopted in June 2020 is the current development plan for the city and sets out agreed planning policies for the city against which decisions are made. Policy H8 seeks to restrict the provision of new student accommodation to specific locations – either on or adjacent to existing university campus sites; within the city centre or district centre or on a site allocated in the development plan to potentially accommodate student accommodation. This approach was intended to continue into the Local Plan 2040, albeit with some more flexibility, allowing new postgraduate accommodation to be built adjacent to existing postgraduate accommodation.

2.17 Policy H9 seeks to restrict the number of full-time taught course students that can live outside of non-university provided accommodation, with separate thresholds set for the University of Oxford and Oxford Brookes University. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. The Local Plan 2040 intended to carry forward this policy but with updated thresholds based on the latest data which was included in the 2023 Student Needs Assessment (2023, Iceni).

Self-Build and Custom Housebuilding

2.18 Policy H7 in the OLP2036 seeks to help encourage sufficient self-build and custom housebuilding to come forward and to support community-led housing. The policy approach is to set a threshold for self-build plots on residential sites. The policy requires 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. The policy also sets out expectations of what plots should have, including services, and access to the public highway. In addition, the policy requires the use of a legal agreement to ensure that self-build plots that have not sold after 12 months of marketing be built and bought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.

2.19 In July 2022, following public consultation and updated government guidance Oxford City Council adopted a Local Connection Test to the Self-build and Custom Housebuilding Register to help understand the local demand for this type of housing within the city. This connection test splits the Self-build and Custom Housebuilding Register into two parts to

provide a differentiation between those people with a local connection to the city (Part A) and those without (Part B).

Elderly persons accommodation

2.20 The Oxford Local Plan 2036 Policy H11 is generally supportive of new elderly persons accommodation, and sets criteria to ensure it is appropriately located and provides a suitable living environment. The intention of the Local Plan 2040 was to continue this approach. This was supported by the County Council. It is recognised that, to be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to justify the on-site staff and facilities. Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.

Gypsy, Traveller and Travelling Showpeople

2.21 Policy H12 is a criteria-based policy which sets out all the requirements to be met for any new pitches for the travelling community, including for travelling showpeople. The 2024 assessment carried out by arc[4] confirmed that this approach could be continued into the new Plan but emphasised that the policy should reflect the differing requirements needed for gypsies and travellers, and travelling showpeople (the latter who need more space for equipment etc.)

Boat Dwellers

2.22 Policy H13 is a criteria-based policy which sets out all the requirements to be met for any new residential moorings or if appropriate, temporary visitor moorings. The 2024 assessment carried out by arc[4] confirmed that the findings of the previous Oxford Boat Dwellers Accommodation Needs Assessment (2018) used to inform this policy has not changed and that the demand/ need for 41 new residential moorings in Oxford remains relevant.

Boarding School Accommodation

2.23 The Local Plan 2036 didn't include any policies regarding boarding school accommodation.

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

Student Accommodation

3.1 The latest Authority Monitoring Report (2023/24) indicates that both universities are currently operating within their respective thresholds for the number of students living outside of university-managed accommodation. One application for new academic floorspace was approved during this period which was compliant with Policy H9.

Self-Build and Custom Housebuilding

3.2   Oxford City Council has had a Self-build and Custom Housebuilding Register in place since 1 April 2016. Inclusion on the Register does not confer any form of entitlement in terms of the provision of serviced plots. Rather, its purpose is to provide local planning authorities with demand data that they can use to understand and plan for the future need for this type of housing in their area. Authorities may, at their discretion, advise people on the Register of relevant proposals for development. Additionally, authorities are expected to meet the level of need indicated by the Register, by permitting an equal number of serviced plots within the following three years to the number of registrations that are made over the preceding three years. This is a rolling requirement, running from the end of October each year.

3.3   Since its introduction in 2016, there have been 140 registrations (139 individuals and 1 group) on the Self-build and Custom Housebuilding Register. As of April 2025 there are 75 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register. Analysis of the addresses of those on Part B of the register suggests that a further 6 individuals cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand.

3.4   The constrained housing land supply in Oxford together with the limited availability of greenfield sites and the typical nature of residential development sites in Oxford, means that in many developments it is not feasible to accommodate self-build plots. For example, in high density flatted developments, in office to residential conversions, in student accommodation developments (also typically flatted), or in employer-linked developments. The types of sites which tend to be more suitable for self-build plots are the larger sub-urban and typically greenfield sites – of which there are few in Oxford. However, proposals for community led and self-build/custom housing are being supported on appropriate sites. Since the adoption of the current Local Plan (OLP2036) there has been one development proposal that includes the provision of self-build plots. This is St Frideswide Farm (21/01449/FUL), a development of 134 homes, 5 or which are self-build. This development commenced in 2023.

Elderly persons and other supported care

3.5   There have been no planning applications for these types of development recently. It is to be expected that these types of development will only come forward sporadically, when a suitable opportunity arises.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

3.6   There have been no planning applications for these types of development during the last few years. However, the criteria-based policies within the Oxford Local Plan 2036 ensures

that a policy framework is present to ensure that these types of applications can be assessed should they be submitted in the future.

Boarding School Accommodation

3.7   Recent applications

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

Student Accommodation

4.1   In the short term, very little would change without a new Local Plan. The latest Authority Monitoring Report (2023/24) indicates that both universities are still operating within their respective thresholds set out in Policy H9 which allows up to a certain number of full-time taught undergraduates to live outside of university managed accommodation. The Student Needs Assessment (2023, Iceni) suggests that these thresholds may not be suitable in the coming years as both universities are predicted to grow at a significantly faster rate than they have during the last few years. Therefore, there is potential for these thresholds to be continually breached and become outdated if a new Local Plan does not emerge which takes account of the latest evidence base.

Self-Build and Custom Housebuilding

4.2   Without a new local plan, the *Self-build and Custom Housebuilding (Register) Regulations 2016* would still apply and there would be a requirement for the City Council to keep the Self-build and Custom Housebuilding Register. Whilst this would help gauge an idea of the level of demand for Self-build and Custom Housebuilding, without an up-to-date local plan there would be no policy framework and demand for this type of housing may not be met.

4.3   With the cost-of-living increases and ongoing affordability issues for housing in Oxford, the loss of a policy that is supportive of this type of housing could result in individuals and organisations seeking to build/ develop this type of housing outside of the city boundary. Therefore, the potential contribution to the overall housing provision that could come through this route would be constrained.

Elderly persons and other supported housing

4.4   In the case of other elderly persons accommodation, the current policy approach is to set criteria for where this is suitable and to ensure it is a good living environment. This policy adds clarity in terms of what is expected, smoothing the application process and ensuring high-quality applications. Without the policy approach, there would be less clarity for applicants and those making decisions on planning applications.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

4.5   The approach to these types of specialist accommodation in the Local Plan 2036 was to have criteria-based policies, which are aligned to the NPPF. Therefore, very little would change without a new Local Plan as the criteria-based policies for the travelling community and boat dwellers would still apply to any application submitted.

Boarding School Accommodation

4.6   The approach to this type of accommodation is to prevent the loss of dwellings, especially with the significant competition for land and sites in Oxford.

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 varying needs and impacts of specialist accommodation that meets the needs of different groups.

5.2   The Local Plan 2042 therefore includes proposed policies in response to 9 topics:

- House of Multiple Occupation (HMOs),

- Location of new student accommodation,

- Student accommodation needs,

- Elderly persons accommodation,

- Gypsy and Traveller accommodation,

- Residential moorings,

- Self Build and Custom House building options,

- Community led housing,

- Boarding School accommodation

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 003a (draft policy H9): Houses of Multiple Occupation (HMO)

5.5   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. For many, Houses in Multiple Occupation (HMO) offer the only available and affordable solution as renting individually or buying a property in Oxford is often too expensive. However high concentrations of HMO can result in changes to the character of the local area and it is therefore important that the supply of this type of home is monitored and controlled.

Table 5.1 - Policy options set 003a: Houses of Multiple Occupation (HMO)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).	This option would slow down the increase in the number of HMOs in specific areas where there are already significant numbers.	This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.
Option b Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size	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	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.

of these in particular areas).	for people living and working across the city, offering another option to those who would struggle to access housing otherwise.	
Option c Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.	This approach would acknowledge that the character of some areas is already influenced by the presence of HMOs.	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.
Option d Do not have any restriction on HMOs.	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.	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.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various options/combinations (e.g. option a, b, c or d, or a+b, c+b, d+b)   **High-level screening conclusion? -** the options should be subject to detailed appraisal.   **Screened in for detailed appraisal? -** Yes   **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. Options a and c represent alternative ways of addressing HMO proliferation, option a seeks to prevent a concentration anywhere above a threshold of 20% frontage, meanwhile option c instead defines geographically

where HMOs would be accepted and where they would not. Option d is to not set any restrictions at all via the Local Plan. Option b could be carried forward on its own, instead relating to allowing new purpose-built HMOs but with restrictions on size, however it could also be combined with one of the other options.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly **criterion 4. Housing Need** in how they impact supply of new housing and deliver upon densification, as well as how they meet the particular needs of people on lower incomes. The options also impact on local amenity and street scene, as well as potentially the demand upon local services/facilities, which most closely matches **criterion 5. Inequalities**, **criterion 11. Urban design** and **criterion 6 Essential services**. Whilst options a, b and c are all likely to have positive impacts against housing need and inequalities as they serve to allow additional HMOs in varying ways to meet the needs of particular demographics, options b and c have the potential to have negative impacts against criterion 5, 6 and 11 where they could lead to additional harm to local amenity, character of the neighbourhood and additional demand on services locally (which option a seeks to avoid by ensuring the proportion of HMOs does not go above a certain threshold). Option c could lead to significant sustainability impacts particularly in relation to amenity and living environment in the areas that are designated as having no restriction, option d would further increase this impact by expanding the area of effect city-wide. Due to the varying level of sustainability impact arising across the potential options, it is considered justified to scope this option set in for detailed appraisal.

Policy options set 003b (draft Policy H10): Location of new student accommodation

5.6 It is important to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing. The policy options below consider the different types of approaches to locating student accommodation and the potential consequences of each option.

Table 5.2 - Policy options set 003b: Location of new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Restrict the locations where new student	This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential	Limiting locations does mean institutions may be less able to meet their needs. Concentrating student accommodations in these areas may mean

accommodation would be allowed to: on or adjacent to existing or 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.	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.	that district centres and the city centre could be dominated by these accommodation types.
Option b 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.	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.	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.
Option c Have no locational restriction on student accommodation but a criteria-based policy.	This would maximise the opportunity to meet student accommodation needs.	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.

Option d Allow new student accommodation only on existing campus sites and on existing student accommodation sites.	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.	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
Option e 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).	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 nonstudent market. Policy flexibility for outside of term time maximise occupation of the developments.	Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.
Option f Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow	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	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.

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).	routes offering a realistic alternative to using a private car.	
Option g Do not have any management restrictions on new student accommodation.	Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.	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.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Options a, b, c or d, in combination with Options e, e+f or g

High-level screening conclusion? - Some of the options are similar to each other from a sustainability perspective. However, where there are differences, such as between Option a and Option d, there is the potential to have significant sustainability impacts, therefore the options should be subject to detailed appraisal.

Screened in for detailed appraisal? - Yes, but only options A, B, C and D

Rationale:

Options a, b, c and d are all alternatives. Options a, b and d discuss restriction but to differing types of areas, whilst Option c has no geographic component and instead sets criteria.

Option e could be taken on its own. It seeks to restrict occupation of new student accommodation to full time students enrolled in courses of at least one academic year or more. Option f could be taken in conjunction with Option e, as it requires a management regime to be agreed which ensures that the development complies with parking standards that only allow operational parking and not residential parking. Option g is an alternative to Option e and Option e +f as it proposes not to have any management restrictions on new student accommodation.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly the impact of this particular type of accommodation on local amenity, which most closely matches **criterion 11. Urban design** (particularly in relation to street scene). The options also contribute to meeting the housing need of a particular community (students) so are relevant to **criterion 4. Local housing needs**. Option b is more negative for local amenity than options a or d because allowing student accommodation along arterial routes, has the potential to significantly change their character. Many of these routes are quieter residential streets which could then become dominated by student accommodation for long stretches, which could have a negative impact on the local community. Option b is slightly more positive for housing as it its less restrictive than options a and c, as it would allow more locations for student accommodation, albeit the positive is a minor one as it is only meeting the needs of one particular group. Option a would score lower than this due to geographical restrictions, these are less restrictive than Option d, which limits student accommodation to existing campus and student accommodation sites. This might result in this type of need not being fully met which would score a minor negative. Ultimately, due to the differences in the likely significant effects on restricting or not restricting the location of student accommodation, we have scoped this in for detailed SA appraisal to fully explore the potential impacts.

Options e, f and g also strongly relate to **criterion 8. traffic and associated air pollution** because they are about managing impacts of students on car parking and the impacts of vehicles on general amenity, because of the increased numbers of residents typically in student accommodation. Options e and e+f would have a minor positive effect on criterion 8 as restricting parking to operational (and disabled) use would reduce the amount of traffic and associated air pollution in the area as students would be using other modes of transport or active travel. Option g would have either a neutral or minor negative impact, depending on implementation. However, Options E, F and G, are not considered necessary for testing through the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach, which is considered to be the area where there could be significant effects that need to be investigated further.

Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs

5.7   The NPPF (paragraph 63) lists students as a group whose housing needs should be understood and attempted to be met. The PPG also notes that there is a need to plan for sufficient student accommodation and that there is an expectation that options which support both the needs of the student population as well as the local population should be considered. The policy options below detail the different types of approaches.

Table 5.3 - Policy options set 003c: Ensuring there is enough student accommodation to meet needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a 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.	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.	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.

Option b 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).	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.	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.
Option c Have no policy linking new academic facilities to student accommodation.	This would mean new institutions could be established in Oxford.	This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, a+b, or c
High-level screening conclusion? - The options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No
Rationale:
Option a could be taken on its own - it seeks to set a threshold for (certain types of) university students living outside of university provided accommodation and prevent expansion of academic facilities should the threshold be breached. Option b expands on Option a by only permitting new academic facilities that will facilitate growth in student numbers if it can be demonstrated how the

students will be accommodated. Option c is an alternative to option a and option a +b as it proposes not having a policy linking new academic facilities to student accommodation.

In relation to the sustainability impacts of the options, primarily they impact on **criterion 4. Local housing needs** in how the Local Plan meets needs for students, but also how we protect loss of other housing to students and achieve the required balance. Local amenity is also relevant, which most directly relates to **criterion 11. Urban design** and the approach to expanding academic facilities relates to criterion **12. Economic growth**.

Options a and a+b will have a similar impact on criterion 4 and criterion 12 as 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. This could have a minor negative impact on both of these criteria, although it would also ensure that there is a policy framework in place to ensure that accommodation for other types of housing need is not all lost to student accommodation. Option c suggests not having a policy linking new academic facilities to student accommodation, which may result in new institutions being able to be established in Oxford and would score a minor positive for criterion 12. Equally, Option c would score a minor negative on criterion 11 as there is the potential for current market and affordable housing to be lost to student accommodation, reducing the supply of this much needed housing in Oxford which is already in short supply, and for quieter residential areas to be dominated by student accommodation, which could have a negative impact on the local community. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003d (draft policy H12): Homes for travelling communities

5.8   The December 2024 update to the Planning policy for traveller sites made clear that the Government's overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community. The policy options below suggest different approaches to how this could be achieved.

Table 5.4 - Policy options set 003d: Homes for travelling communities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.	This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.
Option b Search for sites to allocate to meet an identified need.	This would ensure any identified needs were met within the city.	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.
Option c Do not allocate sites or set out policy criteria – default to national policy (Planning Policy for traveller sites).	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).	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.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b and c are all alternative approaches to one another.
High-level screening conclusion? - The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: The three options are alternatives to one another, but Option a and Option c are similar. The former sets out locally based criteria which might be more appropriate to Oxford's context should sites come forward, whilst the latter relies on the criteria set out in national policy. Neither of these options proposes to search for sites, unlike Option b, which would allocate sites to meet an identified need.

Primarily relates to **criterion 4. Local housing needs** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact as national policy is relied upon. Option a could also have a neutral impact as it doesn't allocate sites to meet this type of need, but the criteria included in the policy should any sites come forward, are more relevant to the local context of Oxford. Option a would score a minor positive in respect of criterion 6, as ensuring accessibility to local services forms part of the criteria to be met. Option b is potentially a minor positive in helping to meet housing need (criterion 4) (should one be identified) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6). Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003e (draft policy H13): Homes for boat dwellers

5.9   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. There are several policy options below which suggest how this type of housing could be approached.

Table 5.5 - Policy options set 003e: Homes for boat dwellers

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a	Criteria can be developed to ensure that residential moorings have the facilities and services they need	If proposals for residential moorings do not spontaneously come forward, then identified needs for

Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.	to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.	moorings will not be met; this approach is not pro-active in trying to meet this need.
Option b Search for a site to allocate for new moorings.	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.	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.
Option c Do not allocate sites or set out policy criteria.	None identified	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b or c are all alternative approaches to each other.
High-level screening conclusion? - The options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No   **Rationale:** All the options are alternatives to each other. Option a proposes not to allocate sites but to have a criteria-based policy should applications come forward. Option b would allocate a site to meet identified need, whilst Option c would not allocate sites or set out policy criteria.

Primarily relates to **criterion 4. Local Housing Need** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact although this may depend on implementation, especially should an application for residential mooring be submitted as there is little national policy guidance in respect of moorings, therefore no clarity on how these applications will be assessed could be given. Option a and b are potentially a minor positive in helping to meet housing need (criterion 4) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6) - either through the criteria as in option a or in the process for allocating the sites as in option b. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003f (draft policy H14): Elderly persons' accommodation and other specialist housing needs

5.10　The NPPF (paragraph 63) lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a number of potential policy responses that could be considered. There are a wide variety of different housing types to support the elderly and those with additional needs. The need for these housing types is set out in Oxfordshire

Table 5.6 - Policy options set 003f: Elderly persons' accommodation and other specialist housing needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a 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,	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.	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

is in accessible locations and is part of a mixed and balanced community.		
Option b Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.	This would maximise the potential for proposals for elderly persons accommodation to come forward.	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.
Option c Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.	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.	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. Ultimately, in Oxford this policy is likely to be ineffective because there are simply not large enough sites available for this approach to be feasible. That is because there is a critical mass of units that are viable to manage. This need may be met on strategic sites just outside the city, or on sites where the developer makes a decision to bring forward a scheme wholly of this type of accommodation.

Option d Include a policy that is restrictive of types of elderly persons' or supported accommodation, for example private market flats available to older people but with limited onsite support.	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.	An attempt to restrict elderly persons' or supported 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.
Option e Do not include a policy relating to elderly persons or other supported accommodation	This would allow the market to respond to need spontaneously and without restriction.	It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs, it could lead to no new accommodation of this type or it may lead to unsuitable accommodation in unsuitable locations that does not help to address needs.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - the options are standalone options, rather than ones that could be combined. **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Only one of the options would actively require supported housing; the others are either supportive of it to a greater or lesser degree or would restrict particular types (in order to encourage others). Even the approach that actively requires supported housing could only apply to very few sites in Oxford, so would not have an impact significantly greater than the other options. PARA summarising the likely sustainability impacts (if any) in relation to the 12 SA criteria

Policy options set 003g (draft policy H15): Self-build and custom house building options

5.11 The NPPF lists people wishing to commission or build their own homes as groups whose housing needs should be understood and attempted to be met. It also states that local planning authorities should seek opportunities through policies and decisions, to support small sites to come forward for self build and custom housebuilding.

5.12 There are several policy responses that could be considered.

Table 5.7 - Policy options set 003g: Self-build and custom house building

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require a proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-build plots for large sites, for example all sites over 100 dwellings). Set threshold to meet identified need.	Gives an opportunity for being able to build your own home in a very constrained city. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	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 plots 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.
Option b Require a smaller proportion of the overall number of units (or of the	This approach could give more certainty that sufficient plots will come forward, because it does not depend on large sites being delivered, and large sites are more easily delayed and the delay of one	The more land given to self-build 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.

site area to be developed for residential use) to be made available as self-build plots for a larger number of smaller sites, for example all sites over 10 dwellings	site when the policy only applies to a few would have a greater impact. Therefore, this may give a greater opportunity for those on the self- build register to gain land to develop their own property.	Marketing of singular self-build flats on multiple sites is likely to be very challenging and unlikely to be practical.
Option c Allow exceptions to the policy where this would not work well (e.g. only flats, student accommodation). Set thresholds to meet identified need.	Such a policy approach ensures that this type of housing is only made available on sites where it would work well.	Sites that would allow exemption would be developed with no self build opportunities.
Option d Include a criteria-based policy which is positive towards but not requiring of self-build	Such a policy approach supports the delivery of other housing beyond self-build and custom build which is where there is the greatest need.	Without a specific policy there is potentially limited scope for people to find self-build plots, or custom housebuilding. This is not compliant with the Government's approach, which requires us to meet the need for self-build and custom housebuilding.
Option e Include in the policy that any self build plots that have been marketed but not sold over a specified time (e.g. 12 months) should be built and brought forward as	Such a policy approach gives an opportunity for those interested to gain land to develop their own property but acknowledges that if the plots have been marketed yet have not sold then they should be made available for the delivery of non self build housing as this is where there is greater need.	Demand for self build plots may vary over time and any new additions to the self build register would have reduced opportunities to develop their own properties as these plots would be lost.

dwellings in the usual way.		

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? – various combinations (e.g. either a, b, c or a combination of a+b+d or a+d or b+d).

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: The self build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self build housing to come forward. The local context in Oxford leads to several potential options for how best to formulate a policy. Options a and b represent different levels of scope over which to apply a requirement (applying to either large sites only or sites over a smaller size threshold), whereas option c allows an exception to the prescriptive policy in circumstances where the provision of self built plots could undermine the delivery of other types of housing. Option d represents a more influential as opposed to prescriptive approach.   Option e represents an additional dimension that could be incorporated with both options a and b or alongside option a or b.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community.   The high land values in Oxford however mean that the provision of self build plots isn't really an affordable housing model/ affordable way to access housing.

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and whilst focusing on larger sites (option a) concentrates delivery, focusing on smaller sites (option b) means that there is more dispersal geographically which could increase delivery times. Potentially option a could have a greater risk of homes not getting finished/ delivered as more smaller sites are likely to come forward than larger ones.   Option c would likely have positive impacts.

Option d of not having a prescriptive approach would likely be neutral impact. Option e could have either a neutral or more positive impact, more positive if the plots are built out for self build but neutral if they are built out as non-self build. Overall the differences between the likely impacts of the options are not considered to be significantly different, none of the options have major impacts on sustainability.

Policy options set 005h (draft policy H15): Community-led housing options

5.13 The NPPF indicates that local planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing. There are several potential policy responses that could be considered.

Table 5.8 - Policy options set 003h: Community-led housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is generally supportive of community-led housing but does not have any requirements.	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.	This approach would actively ensure this housing type comes forward, so would not necessarily result in it being delivered.
Option b Require a proportion of the total site area to be available to groups wishing to develop	Gives a greater opportunity for community-led housing groups, to gain land to develop their own property.	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

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community-led housing (for example of over 100 dwellings).		requirement for self and custom housebuilding 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.
Option C Do not have a policy that is supportive of community-led housing schemes.	Such a policy approach supports the delivery of other types of housing for which there is greater need.	Without a specific policy there is potentially limited scope for people to join community-led housing schemes.

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 are similar to each other and are unlikely to have significant sustainability impacts.

Screened in for detailed appraisal? - No

Rationale: The local context in Oxford leads to several potential options for how best to formulate a policy. Option a shows general support but would contain no requirement for this housing type, which is probably appropriate given that whether it comes forward would be out of the control of developers. Option b would set a requirement for a certain amount of this housing type on large sites, although it would not be expected that there would be community housing groups necessarily ready to take up opportunities. Option c would have no policy support for this housing type.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community.   The high land values in Oxford

however mean that community housing isn't necessarily likely to be an affordable housing model/ affordable way to access housing.

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and opportunities could be taken to delivery this housing type by community housing groups if they are in a position to. The options would all be likely to have only a neutral effect on criterion 4.

Policy options set 003i (draft policy H16): Boarding School Accommodation

5.14 There is no national policy or guidance regarding the development of boarding schools. However, the context of Oxford would encourage a policy as Oxford has a very large housing need with significant competition for land and sites. There are several policy options that can address the development of boarding schools.

Table 5.9 - Policy options set 003i: Boarding School Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that allows this accommodation type in most locations, with some criteria guiding how they come forward.	This still accommodates for expansion of boarding accommodation but sets out a clear criterion which will protect the loss of C3 dwellings.	This approach would likely do little to prevent the competition of this accommodation type with other housing types tha meet housing needs.
Option b Include a more restrictive policy that limits the locations where this type of accommodaion would be permitted, for example to allow it only on existing school sites.	This restricts boarding school accommodation to the locations where it is most suitable for students and tries to avoid potential issues with surrounding neighbourhoods.	Boarding schools may find this approach too restrictive if they have significant growth plans.

Option c Do not include a policy relating to boarding school accommodation.	Boarding schools would have no restrictions on developing accommodation to meet their own needs.	This may cause the loss of C3 dwellings or compete with opportunities to delivery C3 dwellings, and may also cause harm to local neighbourhood and character of the area.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** The options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, it would be appropriate to consider having a policy as there is no specific NPPF guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy. There have been several recent planning applications for boarding school accommodation, demonstrating local demand. This type of accommodation is not classed as residential and does not form part of Oxford's housing need. The inclusion of a policy would enable the monitoring of growth and ensure that boarding school accommodation is granted where appropriate and not competing for much needed residential dwellings and development. In terms of sustainability impacts, the different options all score against **criterion 4. local housing need** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a neutral impact as this policy won't necessarily create or bring forward any new residential homes. Option b would have a neutral impact as it would be permitting limited development but still not bringing forward new residential development (although does the most to avoid competition with it). Option c could potentially have a minor negative impact as without a policy it could reduce sites available for residential development. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option.

6. Conclusions including preferred approaches for Local Plan 2042

6.1 Housing is a social need, so it is important to try to provide the right types of housing for those who need it. Specialist housing is not however a one size fits all and the accommodation needs of different groups will vary. The policies of the Local Plan can help address the varied needs for different specialist housing types.

6.2 For self-build and custom housebuilding, and most supported housing types, it is often the land availability or availability of large enough sites that is an issue, and therefore the plan must address how to provide for this type of housing in a city where there is a lack of housing provision more generally.

6.3 In terms of students, whilst housing students in purpose built accommodation can help to free up other housing types, leaving more available on the general market for others in the community, land that could be used for student accommodation is also likely to be suitable for the delivery of general housing and as such a delicate balance must be struck. Students can be accommodated in many ways, and how students are housed has other social consequences. For example, housing students in unsuitable locations could lead to local difficulties in the community with possible perceptions of anti-social behaviour within the community and could also lead to students feeling isolated and not fully part of the city. Attracting students is essential for the success of the universities. Provision of affordable accommodation for students is part of what the universities can offer. The universities make a significant economic contribution to the city and beyond and also carry out important research and development, which in turn has a social impact.

Key sustainability issues for the Local Plan to address:

6.1 Local Housing Needs:
- The plan should assess and respond to the need for specialist housing provision.
- The links between the provision of market and affordable housing and other specialist housing provision should be considered when developing policies.
- The significant competition for sites, between housing and other uses but also between housing to meet the needs of different groups, means that a balance needs to be struck.
- The potential implications of new student accommodation in different locations, for existing students and neighbourhoods and in terms of delivering sufficient housing of the right type should be considered

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

6.3   Urban Design:
- Housing, of various types, needs to be appropriately located, considering amenity of existing neighbours, and suitability for new proposed residents.
- The plan should address the extent to which additional specialist housing in particular areas could have implications for the local amenity/character of the neighbourhood.

6.4   Essential Services:
- The plan should address whether new housing could potentially place a greater demand on local services and facilities within areas.

6.1. Preferred approaches for the Local Plan 2042

6.5   Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address specialist housing provision. 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 Regulation 18 consultation document, is as follows:

Houses in Multiple Occupation – Draft policy H9

6.6   The preferred approach for the Local Plan 2042 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street.   This will help to ensure that there does not become overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

6.7   The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward to meet needs, in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. Option B relates to purpose-built HMO and is not a preferred option as provision of this type of accommodation reduces potential for delivering housing that meets greater needs (such as social rented housing). There is also potential that under option B large purpose-built HMOs may be put forward with the intention of them housing students, in locations where purpose-built halls of residents would not be permitted. Option D does not set any restrictions at all via the Local Plan and whilst the lack of any restriction may not make a difference in some areas of the city, there is potential for a significant amount of HMOs to come forward in other areas at the expense of meeting other housing needs. It is for this reason that option D is not a preferred option.

6.8   The options set was tested through the Sustainability Appraisal with Option A and C scoring more positive than Option D. Option D scored negatively against SA objective 4

whilst options A and C had some positive and some negative. Option D also scored negatively against SA objective 11, whilst Option A was neutral and Option C potentially could have negative impacts, depending on implementation. Option B, which is an additional element to the policy that could be combined with the others, rather than an alternative approach to them, might have additional positive sustainability impacts, for example for SA objective 5 if it was to be taken forward, however, Option B is not proposed as part of the preferred approach as discussed above.

Location of New Student Accommodation – Draft Policy H10

6.9 The preferred approach is a combination of **options A, E and F**. Options A, B, C and D were tested through the SA in order to further explore their potential sustainability impacts. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. Option A is supportive of locating student accommodation in the most suitable places adjacent to existing institutions or student accommodation sites to avoid potential issues with unneighbourly behaviour, and in sustainable locations such as city and district centres. 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, whilst ensuring that other sites that are most suitable for general market and affordable housing can be developed for those purposes. Options E and F ensure that 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 nonstudent market. It also allows for policy flexibility for outside of term time to maximise occupation of the developments, whilst supporting the policy approach to put downward pressure on parking in the city.

Linking New Academic Facilities with the Adequate Provision of Student Accommodation – Draft Policy H11

6.10 The preferred approach for the Local Plan 2042 is to include a policy which set thresholds for university students living outside of university provided accommodation and also prevents expansion of academic facilities if the threshold is breached. The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and affordable housing which is a priority for this Plan. Of the three options considered, **Options A and B** in combination is the preferred approach which reflects this balance that needs to be struck.

Homes for Travelling Communities – Draft Policy H12

6.11 To support the travelling community, the preferred approach for the Local Plan 2042 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that

their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

6.12 Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for gypsy and traveller pitches and travelling showpeople yards to be assessed against should they come forward, where all criteria will need to be met, whilst not allocating sites.

Homes for Boat Dwellers – Draft Policy H13

6.13 To support those people who wish to live on boats, the preferred approach for the Local Plan 2042 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

6.14 Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for residential moorings to be assessed against where all criteria will need to be met, whilst not setting out specifically where these moorings should be located.

Older Persons and Other Specialist Accommodation – Draft Policy H14

6.15 The preferred approach for the Local Plan 2042 is to have a local policy that sets criteria to guide where and how this type of accommodation comes forward. It is not proposed to set any kind of requirement for this housing type. That is because of the lack of opportunity to do so in the city, which lacks sites of a large enough capacity.

6.16 Whilst either of the four options, option A, B, C, D or E could be taken forward, the preferred approach is **Options A.** This option is supportive of elderly persons accommodation, but reflects both the fact that there is only a modest need in Oxford, compared to a significant need for other housing types, and that this housing type is likely to come forward in an unpredictable way, in response to a variety of factors that may influence the landowner, rather than being predictable enough to enable an allocation. It also reflects the fact there are no sites large enough for this to come forward as a requirement for part of a site over a certain size.

Self-Build and Custom Housebuilding – Draft Policy H15

6.17 To support people wishing to build their own homes, the preferred approach for the Local Plan 2042 is to include a policy that requires self-build/ custom built plots to be made available.

6.18 Of the five options, either option or various combinations of these could be taken forward. The preferred approach is a combination of **Options A, C and E** which will provide an

opportunity for this type of housing to come forward on sites that are suitable and where it would work well, yet also ensures that any plots marketed for self build that have not sold after a certain period of time can be made available for other housing as this is where there is a greater need.

Community led housing – Draft Policy H15

6.19 To support community- led housing schemes, the preferred approach for the Local Plan 2042 is to include a policy that supports this type of housing. Of the three options, either option could be taken forward. The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward on sites that are suitable. Although acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, community-led housing has been incorporated within policy H15 rather than a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

Boarding School Accommodation – Draft Policy H16

6.20 The preferred approach for the Local Plan 2042 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sies or adjacent to them.

6.21 Whilst either of the three options, option A, B, or C could be taken forward, the preferred approach is **Options B.** This option limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.