

# Chapter 2 – A Healthy Inclusive City to Live In

## Contents

- Chapter 2 – A Healthy Inclusive City to Live In ..... 1
  - Headlines for Chapter 2: ..... 2
  - Short Questionnaire Responses..... 3
  - All Public Responses – Draft Policy H1..... 4
  - Statutory Consultee Responses – Draft Policy H1 ..... 18
  - All Public Responses – Draft Policy H2..... 24
  - Statutory Consultee Responses – Draft Policy H2 ..... 29
  - All Public Responses – Draft Policy H3..... 33
  - Statutory Consultee Responses – Draft Policy H3 ..... 42
  - All Public Responses – Draft Policy H4..... 44
  - Statutory Consultee Responses – Draft Policy H4 ..... 49
  - All Public Responses – Draft Policy H5..... 51
  - Statutory Consultee Responses – Draft Policy H5 ..... 54
  - All Public Responses – Draft Policy H6..... 57
  - Statutory Consultee Responses – Draft Policy H6 ..... 60
  - All Public Responses – Draft Policy H7..... 62
  - Statutory Consultee Responses – Draft Policy H7 ..... 66
  - All Public Responses – Draft Policy H8..... 68
  - Statutory Consultee Responses – Draft Policy H8 ..... 70
  - All Public Responses – Draft Policy H9..... 71
  - Statutory Consultee Responses – Draft Policy H9 ..... 77
  - All Public Responses – Draft Policy H10..... 78
  - Statutory Consultee Responses – Draft Policy H10 ..... 83
  - All Public Responses – Draft Policy H11..... 84
  - Statutory Consultee Responses – Draft Policy H11 ..... 87
  - All Public Responses Draft Policy H12 ..... 88

Statutory Consultee Responses – Draft Policy H12 .....	91
All Public Responses – Draft Policy H13.....	92
Statutory Consultee Responses – Draft Policy H13 .....	94
All Public Responses – Draft Policy H14.....	96
Statutory Consultee Responses – Draft Policy H14 .....	98
All Public Responses – Draft Policy H15.....	103
Statutory Consultee Responses – Draft Policy H15 .....	106
All Public Responses – Draft Policy H16.....	107
Statutory Consultee Responses – Draft Policy H16 .....	108
All Public Responses to the Whole of Chapter 2 .....	108

## Headlines for Chapter 2:

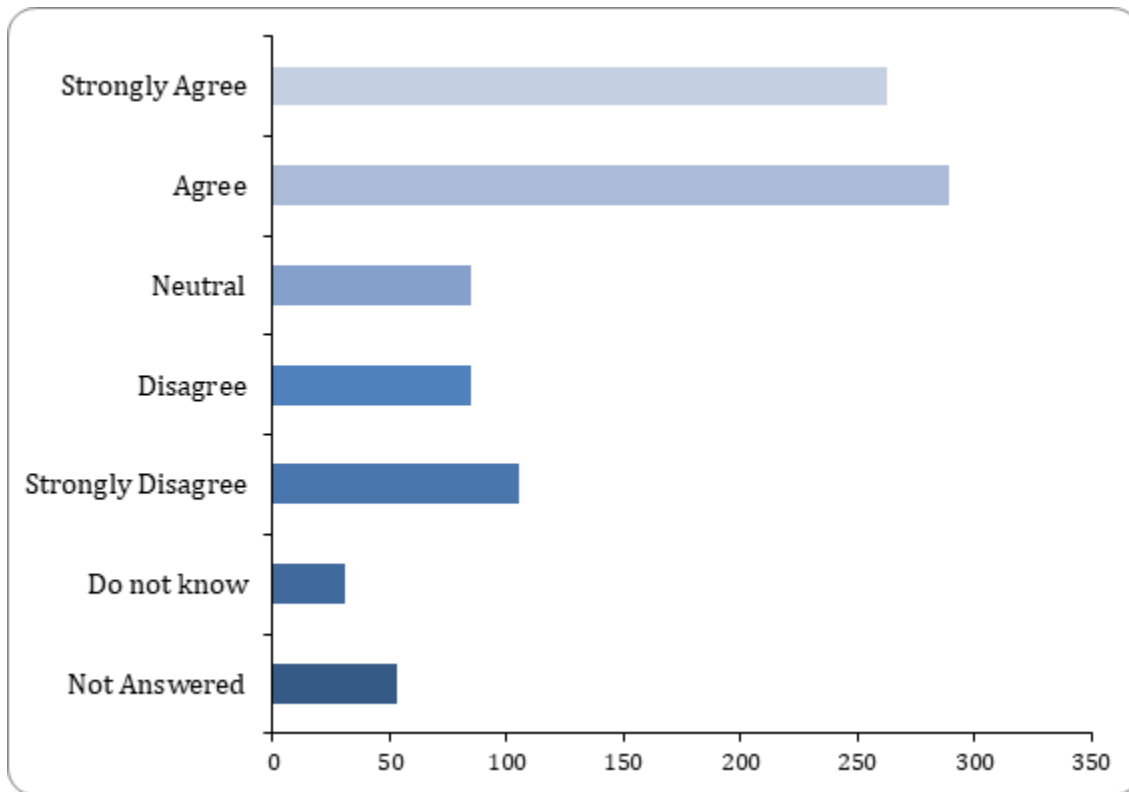
- General consensus that housing is needed in Oxford and general support for more affordable housing
- Confusion around the term ‘affordable housing’
- General support for affordable housing contributions policies and some objections
- Majority of support towards the affordable housing threshold with some push to make the threshold higher
- Commentary about using empty homes and buildings for housing
- Some respondents preferred proposed alternative policy options

## Short Questionnaire Responses

### Affordable housing

We have used up-to-date evidence of costs and profits in new developments to set an affordable housing requirement- we are proposing that 40% of new developments with more than 10 homes should be affordable, and 80% of those affordable homes should be social rented housing as this is the most affordable type to best meet needs. To what extent do you agree with this approach?

There were 858 responses to this part of the question.

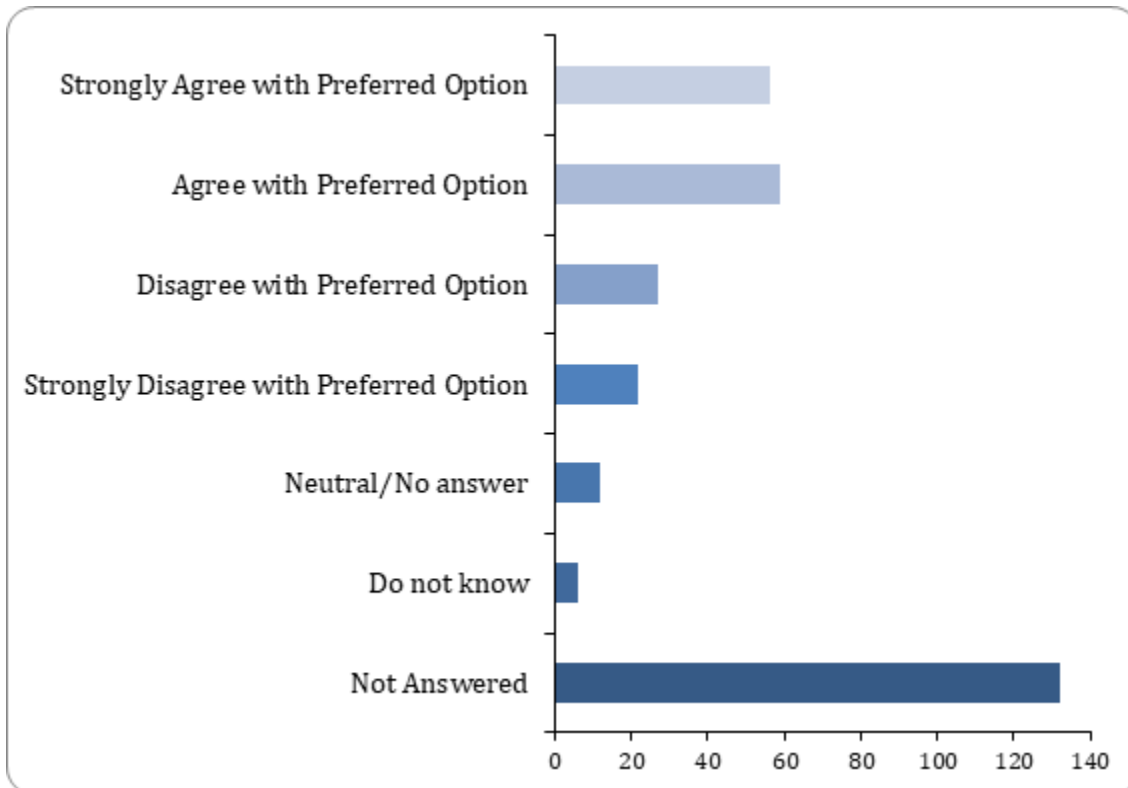


Option	Total	Percent
Strongly Agree	263	28.87%
Agree	289	31.72%
Neutral	85	9.33%
Disagree	85	9.33%
Strongly Disagree	105	11.53%
Do not know	31	3.40%
Not Answered	53	5.82%

## All Public Responses – Draft Policy H1

Please tell us what you think about policy options set 001a (draft policy H1): Housing requirement for the plan period.

There were 182 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	56	17.83%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	27	8.60%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	12	3.82%
Do not know	6	1.91%
Not Answered	132	42.04%

Draft policy	Topic	Summary of comments	Response
H1	Housing requirement - Exceeding the SM	<p>Would support a housing requirement above the level calculated by the SM. The NPPF para 62 confirms this is possible and that it should not normally have to be thoroughly justified at examination. BP001 does not reference this change in approach. If the sub-region is to meet its economic potential and address the affordability challenge the housing requirement and level of unmet need must be increased. Calculate that from 2036 there is a deficit of 4,550 homes 2,376 homes 2036-2040 (1,087-493), plus 2,174 homes 2040-2042 (1087*2).</p>	<p>The level of unmet need needs to be calculated over the Plan period and discussions with neighbouring districts will take place about meeting that need over the Plan period. A higher than SM housing requirement in Oxford, given its limited capacity, would be essentially setting a requirement for outside the city and would need robust justification at examination, and is not considered to be a justifiable approach.</p>
H1	Housing requirement – using Standard Method	<p>Support the SM housing need figure of 1087dpa (21,740 over plan period)</p> <p>To unlock Oxford’s economic potential, its full housing requirement must be met, as housing supports job creation and regional growth. This requires a coordinated cross-boundary strategy with neighbouring authorities, as confirmed by planning inspectors. The housing need should follow the standard method unless there are exceptional reasons to adjust it.</p>	<p>Policy H1 calculates housing need using the Standard Method, and latest government affordability data.</p>
H1	Housing need is higher than Standard Method	<p>We acknowledge that efforts to secure higher growth in the Local Plan 2040 failed at examination. However, basing a housing requirement simply on a calculation of capacity, risks continuing to exacerbate a shortage in housing supply. Should first conclude duty to cooperate</p>	<p>Duty to cooperate discussions cannot be concluded before the capacity is confirmed through the examination process, but discussions are in train.</p>

Draft policy	Topic	Summary of comments	Response
		<p>discussions, before taking forward a strategy that knowingly supresses growth.</p> <p>A significant uplift in the delivery of housing will be essential for contributing to the growth ambitions, which we expect to be established by the Oxfordshire Growth Commission and for the Oxford-Cambridge Corridor. Only when these ambitions are fully understood can there be a full understanding of housing needs to assess against the Standard Method to establish a housing requirement that is able to take account of the exceptionally strong economic growth in Oxfordshire, which, if not supported by adequate provision of housing will continue to lead to problems of affordability, inaccessibility of housing and uncreased unsustainable commuting patterns.</p> <p>Whilst the previous Local Plan Inspectors did not conclude there was sufficient evidence to depart from standard method, that does not infer that the Council’s should now settle for standard method as an indication of actual need. Need to undertake more work to understand and identify the actual growth requirements for the city and then work with neighbouring authorities to consider how the needs can best be met.</p> <p>Should reflect locally the Oxfordshire Leaders Joint Committee (OLJC) and the Vision for Oxfordshire.</p> <p>There is a strong case for a higher level of growth than is being provided for in the City Plan, whilst recognising that Oxford City has limited capacity ( and this was the case when the adopted City Local Plan was prepared); it is considered that it is incumbent upon the</p>	<p>The Oxford Local Plan 2045 cannot consider the growth needs for all of Oxfordshire. Use of the Standard Method to assess housing need in Oxford is considered to be the most appropriate approach at the current time.</p>

Draft policy	Topic	Summary of comments	Response
		<p>authorities to work together to deliver the significant boost to the supply of homes (following on from the Growth Deal) in accordance with the NPPF and support both the local and national economic objectives some of which are outlined above.</p> <p>It is considered that provision should be made for a higher housing requirement than that based on the Standard Method (this level of growth should not be dismissed purely on the basis that there is insufficient capacity) and we would therefore urge the Council to urgently examine what is needed to support economic growth of Oxford and its hinterland and recognise that the housing needs of Oxford may well be higher than those proposed by the standard method and in doing so explore this strategic issue with neighbouring authorities through the duty to co-operate.</p>	
	Capacity calculation and plan period	<p>The supply would also need to be adjusted; it is noted in Background Paper 001 that the capacity work carried out for the preparation of the Oxford Local Plan 2040 showed a supply/capacity of 9,851 dwellings for the period 2020-2040 i.e. an average of 453 dwellings per annum. (it is noted that this work is being updated) however, the plan period is inconsistent with national policy so delivery from the three years preceding the assessment of housing need will need to be removed from the total housing supply expected in Oxford City.</p> <p>Agree that: "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." Recognise that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will</p>	The capacity has been updated and recalculated to reflect the 2025-2045 plan period.

Draft policy	Topic	Summary of comments	Response
		<p>need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every potential avenue for housing is explored before a 'capacity cap' is identified.</p>	
H1	Plan period start date	<p>HBF does not agree with the Council's decision to use a plan period that starts in 2022, over three years prior to the local plan's expected submission. Such an approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. This is clear from paragraph 2a-004 in Planning Practice Guidance (PPG), which notes that when setting the baseline for the standard method the most recent assessment dwelling stock is used.</p>	<p>Since the Regulation 18 consultation, the Plan period has been adjusted to a 2025 start date, with a plan period now of 2025-2045.</p>
H1	Sources of sites and prioritising brownfield first	<p>While it is right for the Local Plan to maximise delivery on previously developed land (PDL); where housing and employment needs cannot be met on such sites, Greenfield sites will be required not only for the overall quantum of development but also to create a rolling supply of housing land (five-year land supply). Capacity should include the Allotments as a housing development site. No stone should be left unturned.</p> <p>Many of the proposed new site allocations for housing are on greenfield land. These should only be approved once all opportunities to use brownfield land have been exhausted. Some of the proposed building sites seem to conflict with many of the advertised priorities</p>	<p>Greenfield sites and allotment sites are both included in the Strategic Housing Land Availability Assessment (SHLAA). The only types of sites not included are those with national designations which preclude development, such as SSSI and Flood Zone 3b (greenfield).</p> <p>National policy establishes that development on brownfield should be prioritised, but not enough sites can be identified on</p>



Draft policy	Topic	Summary of comments	Response
		of the Local Plan, including retaining green infrastructure and respecting heritage sites.	brownfield alone to meet Oxford's housing need so some greenfield sites are also needed, whilst also balancing other priorities and objectives of the Plan.
H1	Should encourage conversion of employment to residential	<p>Plan should encourage the conversion of vacant employment uses (offices, retail) into residential use. The delivery of residential units within the city centre and district centres would bring great benefits. More life would be breathed into city streets, such as Cornmarket Street, if there was a mix of residents, workers and tourists. The preference for mixed use developments should also be mentioned within this policy. While the provision of dwellings is important, to do this successfully within urban centres the activation of ground floor units must be retained. This will help to protect the existing public realm.</p> <p>There is a chronic lack of affordable housing in Oxford. It is such an expensive city in which to buy or rent a house in that essential workers struggle to find a home here and instead travel in from outside the city, contributing to the appalling gridlock on our roads with which all residents are all too familiar. The Plan should seize the opportunity to convert existing brownfield sites into affordable housing rather than turning them over to new work sites (maximizing employment) that will only add to the number of commuters. Empty retail and office space should be actively targeted to create affordable housing.</p>	The plan supports the conversion of employment sites to residential in Policy E1 where the landowner is interested in doing so. Many employment sites in Oxford also qualify for permitted development rights for conversion of office to residential. A particular challenge in recent years is that retaining employment uses often provides a higher return to the landowner.
H1	Process for addressing	there is still uncertainty as to what Oxford's unmet housing needs are without an up to date housing land availability assessment but on the basis of those plans being progressed elsewhere in Oxford it would	Duty to Cooperate work with neighbouring district councils is

Draft policy	Topic	Summary of comments	Response
	unmet housing need	<p>appear that there will still be some unmet housing needs. It will therefore be necessary for OC to work with its neighbours to identify additional supply to meet these needs as part of their duty to co-operate. Agreements must be reached that unmet needs will be met in full and that when new plans are prepared, they will maintain commitment to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full.</p> <p>Para 2.3 explains no process for how the unmet need figure to 2042 will be accommodated, this must be fully resolved before Reg 19.</p> <p>Recent updates to national planning guidance have increased the calculated housing need for Oxford and surrounding areas. Given government ambitions and the work of the Oxford Growth Commission, further analysis is needed to potentially raise housing targets, considering economic growth and housing affordability challenges. After this, the emerging plan should identify how much housing can be accommodated within Oxford itself, with the remaining unmet need addressed through agreements with neighbouring authorities. The previously agreed unmet housing figure (14,300 dwellings) from 2016 now needs updating and reconsideration for the new plan period based on current evidence and collaboration</p>	ongoing to address Oxford's unmet housing need.

Draft policy	Topic	Summary of comments	Response
		<p>Unmet need of 11,889 will have to be agreed with the neighbouring Oxfordshire authorities.</p> <p>It is considered that in order to meet the unmet needs is falls to Oxford City to work with its neighbouring authorities to identify additional supply to meet these needs as part of their duty to co-operate. It is considered that agreements must be reached so that unmet needs will be met in full and to ensure that when new plans are prepared, they will maintain commitments to meeting the housing needs of Oxford and not seek to use preexisting supply to address their own needs, leaving Oxford City with substantial unmet housing needs. Without such agreements there can be no certainty that Oxford's need in their latest plan will be met in full.</p>	
H1	Sites in adjoining districts for Oxford unmet need	It is suggested that the remaining unallocated land and Dalton Barracks and Abingdon Airfield is best placed to assist in providing some of the unmet need through the expansion of Dalton Barracks Garden Village site allocation that could provide an additional 2,500 new homes over the current allocation.	Duty to Cooperate work with neighbouring district councils is ongoing to address Oxford's unmet housing need.
H1	Build to Rent and co-living provision	<p>Consider that the Plan (at Policy H1) should also give positive encouragement to the development of BTR schemes as these are ideally suited to smaller brownfield sites located within city centres that can be constructed at high densities. BTR schemes can also make significant reductions to local housing supply figures as a high number of units can be constructed within a short space of time. The draft Local Plan fails to consider in any detail more modern housing tenures such as build to rent or co-living.</p> <p>Such tenures are actively promoted in the latest iterations of both the National Planning Policy Framework (NPPF) and the National Planning</p>	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.

Draft policy	Topic	Summary of comments	Response
		<p>Practice Guidance (NPPG). The NPPG within the 'Build to Rent' (BTR) chapter (Paragraph: 001 Reference ID: 60-001-20180913) states "as part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent".</p> <p>Co-living, a form of build to rent, is a relatively new concept of housing which aims to provide a housing option for single person households, who cannot or chose not to live in self-contained homes or Houses in Multiple Occupation (HMOs). In planning terms this housing type is sui generis non-self-contained market housing and is not considered conventional residential, which would fall under Use Class C3. This type of housing is not restricted to particular groups by occupation or specific needs. In addition, communal amenity space is provided in lieu of private floorspace to create a sense of community and encourage social interaction and engagement between its residents. The private units are appropriately sized to be comfortable and functional for tenant's needs and generally include en-suite bathrooms and limited cooking facilities (e.g. a kitchenette), but with access to larger kitchen facilities elsewhere in the development. It is important to note that the National Housing Space Standards do not apply to this type of accommodation due to its key attribute as a 'cost-effective' alternative form of housing, which would be proven negligible should unit sizes be increased.</p> <p>It is not clear as to whether any assessment has been undertaken into the potential requirement for build to rent homes.</p>	

Draft policy	Topic	Summary of comments	Response
		<p>A plan-led solution to supply will help to ensure that housing is delivered in the most sustainable locations, and that it meets the needs of groups with specific housing requirements, as set out in the NPPF at Section 5. The Draft Plan’s Paragraph 2.38 notes this also. Therefore, there is an overriding principle to facilitate the supply of housing to meet specific needs in the city, this should include housing targeted at single households, including co-living.</p> <p>Co-living housing is for single households and in planning terms, falls under sui generis non-self-contained market housing. Therefore, requirements applicable to conventional residential development (Use Class C3) are not applicable to this housing type, and therefore any new policy (or alternatively an extension to Policy 14) should address:</p> <ul style="list-style-type: none"> <li>• Room space standards – minimum 18 sqm typically.</li> <li>• Internal and external amenity space requirements.</li> <li>• Affordable housing approach – assume PIL typically (see Para 2.9, forth bullet).</li> <li>• Management expectations.</li> <li>• Preferred locations – assume central and accessible typically such as City and District Centers.</li> </ul>	
H1	Should go further to find sites for housing	Where major developers are being permitted to use part of their employment sites for other uses, affordable/employee housing should be the first consideration. Specific, proactive allocations should be made for housing, for example on empty retail and office space.	Allocations can’t be made for sites where no landowner interest is present. However, where it is, then sites are allocated where appropriate.
H1	Housing Requirement	CPRE support the revised methodology used to ascertain a lower housing need from that identified in the previous Local Plan. We seek	Clarity on unmet need is given in the Draft Submission Local Plan.

Draft policy	Topic	Summary of comments	Response
		<p>an emphasis on all housing need to be provided within the City boundaries, making best use of existing allocated sites, and particularly support the emphasis and policy on existing allocated employment sites reverting to housing. We seek clarity on the unmet housing numbers ( if any) which the city council will be seeking to be met by its neighbouring districts and understand that work in being undertaken in this area. We seek all efforts to be made that any such unmet need can be accommodated on existing allocated sites, using higher densities and good design. We will strongly oppose any proposal for unmet housing need to be met in the Oxford Green Belt or in the open countryside generally. CPRE Oxford City seek further interim consultation when detailed housing numbers are available . It is not possible to comment constructively without sight of the overall and detailed site specific housing numbers. It is vital that a further interim stage of consultation is undertaken when housing numbers become available in order that the City meets its duty to cooperate with neighbouring districts and democratic consultation can be incorporated.</p> <p>It is not acceptable that there will be no sight of the detailed housing numbers until the Reg 19 stage, when comment can only be given on legal and compliance grounds.</p> <p>Therefore, an interim consultation on housing numbers must be undertaken prior to Reg 19.</p>	<p>All attempts have been made to find capacity for housing.</p>
H1	Delivery through small sites	<p>It is ... unclear as to whether the Council will, as required by paragraph 73 of the NPPF, be delivering 10% of its housing requirement on sites of one hectare or less. Whilst the HBF recognises that Oxford is constrained it should still seek to identify and allocate as many small sites as possible through this local plan rather than rely on windfall</p>	<p>Sites with a capacity of more than 10 are allocated, and these really are quite small sites, which Oxford does heavily rely on. Indeed there are few large sites in Oxford at all.</p>

Draft policy	Topic	Summary of comments	Response
		<p>from such sites. Recent research by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up their residential activities in the next three years. Whilst this decline is due to a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.</p>	<p>Sites smaller than 20 do not need a site allocation as there will not be anything site- specific that needs to be said in a site allocation policy, but the generic policies of the plan are adequate.</p>
H1	<p>Evidence underpinning housing need</p> <p>Exclusion of sites under 10 homes (HENA)</p> <p>Modification/ amendment</p>	<p>The HENA used for the calculation is based on a set of mainly generic metrics and calculations ignoring most of the special factors in Oxford. The representation then goes on to critique the HENA.</p> <p>The Government Planning Practice Guidance suggests sites of 5 units or more should be included in Housing and Economic Land Availability Assessments, but Oxford City Council has excluded all sites from a Site Assessment under 10.</p> <p>Important sites listed below (eg: Policy XXX etc) are in their relevant sections are NOT included in the Plan which therefore is unsound as consultation and assessments of sites with important constraints have not been assessed and the community has not been given a chance to give input.</p> <p>Three modifications are suggested,</p> <ol style="list-style-type: none"> <li>1. A rerun of the HENA Calculating the actual housing need</li> </ol>	<p>HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government's Standard Method for its assessment of housing need.</p>

Draft policy	Topic	Summary of comments	Response
		<ol style="list-style-type: none"> <li data-bbox="674 237 1503 310">2. Inclusion of all Sites with less than 10 houses (Listed in each Area section)</li> <li data-bbox="674 313 1524 386">3. A report detailing how HENA representations were taken into account (which they were not)</li> </ol>	<p data-bbox="1562 237 2026 500">HENA evidence not relied upon. It was the supporting evidence for the LP2040 (withdrawn). This Emerging Local Plan relies on Government’s Standard Method for its assessment of housing need.</p>
H1	Student accommodation ratio	<p data-bbox="625 513 1545 852">A significant proportion of the housing supply is a result of student accommodation. This is accounted for in the supply with a 2.5 student bed spaces considered the equivalent to one dwelling. This is 2.5:1 ratio is taken from the Housing Delivery Test which is based on national data as to students per dwelling. However, given the significant amount of student accommodation being built in Oxford the HBF would suggest that a local assessment is required to see whether this is accurate for Oxford and the contribution of student accommodation to overall housing supply is not being overestimated.</p>	<p data-bbox="1562 513 2026 699">The HDT ratio of 2.4 will be applied when measuring Oxford against the HDT, so applying a different ratio would not be appropriate.</p>
H1	General comment	<p data-bbox="625 865 1545 1395">Planning for the right number of new homes is vital to the (OUH) Trust. This is to meet the needs of staff (and affiliated students), and also the continued sustainability of the wider community of Oxford. While the Council will need to maximise delivery on available sites; the Local Plan will inevitably set a “capacity constrained” housing requirement. The Trusts agrees that: “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.” The Trust recognises that Oxford City is a constrained area for development: There is the Green Belt, Flood Zones, and the setting of heritage assets that all impact on available development land. The Council will need to work with landowners, and its local authority neighbours to explore all options for delivering new homes (including Green Belt review), ensuring that every</p>	<p data-bbox="1562 865 1808 894">Comments noted.</p>



Draft policy	Topic	Summary of comments	Response
		potential avenue for housing is explored before a 'capacity cap' is identified. The Trust welcomes the flexible approach that is being taken to the proposed development allocations on its land, which includes the potential for employer linked housing where appropriate, which could contribute to meeting the overall need for new homes in Oxford.	
H1	Heights	When there is such a great need for housing, confusion around only 5-7 stories	There is no 5-7 storey limit in the plan.
H1	Support for more flats	Build more flats to meet need	The minimum housing numbers assumed will sometimes mean flats are likely to be the solution, particularly in the city centre and district centre, but there are considerations, including viability.
H1	Capacity/constraint based housing requirement	While we broadly agree with the preferred option, which would provide a capacity/constraint-based housing requirement based off what is deliverable within Oxford City Council's boundaries, we consider the policy should include a fall-back allowing for higher density development in the case neighbouring authorities are unable to meet the shortfall in identified housing need. We consider this caveat to be pertinent given the recent breakdown in negotiations for the Oxfordshire Plan 2050.	The densities applied are already in the spirit of maximising capacity.
H1	Disagree with Standard Method Approach	Oxford should start with the full Standard-Method figure as a minimum and treat capacity as elastic: permit gentle densification of suburbs, up-zone transit corridors and retail parks for mid-rise mixed-use blocks, scrap parking minimums, and allow residential on employment land unless a net jobs loss is proven. A rules-based, form-led code would let bottom-up market forces deliver homes swiftly while keeping the city compact, liveable and globally competitive.	These measures are part of the plan, but assumptions of capacity are based on evidence of what may come forward, and can't simply be aspirational numbers based on assuming something will happen that there is no suggestion will practically be able to happen

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			(e.g. densification across whole estates).
H1	Prioritise housing over employment	More employment might be driving up house prices, meaning people have to commute which isn't sensible in light of the Climate Emergency doesn't make sense. The population needs a good cross section of people to thrive.	Comment noted.
H1	Ambiguity around unmet need	Agreement with standard method but unclear where unmet need figure has come from and why the plan period runs to 2042.	The plan period now runs until 2045. The unmet need is the difference between the calculated capacity and the housing need (as calculated by the standard method).
N/A	Identifying housing sites	All sites earmarked for development over 3 units should be shown as Preferred Options – not merely those over 10 units. This conceals the true impacts of development on city's green spaces.	Sites with development potential are identified within the Strategic Housing Land Availability Assessment (SHLAA). Sites which are unlikely to deliver 10+ dwellings net gain are not included as site allocations.

## Statutory Consultee Responses – Draft Policy H1

Cherwell District Council

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
H1	Note that the Government's standard method is to be used and this is welcomed. The Local	Dialogue is ongoing with the other Oxfordshire districts about our	Dialogue to be ongoing.

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>Plan 2036 contained a level of unmet housing need for which the other Oxfordshire districts made provision for. Cherwell committed to delivering 4,400 homes in 6 partial review sites. No request has been made yet by Oxford City Council for help accommodating any additional unmet need. Any additional unmet housing need must be rigorously examined and Cherwell DC would want to explore through Duty to Cooperate process whether the city can accommodate any additional unmet need within its own boundaries.</p>	<p>capacity assessment and likely request for unmet need. The agreed unmet need links to the 2036 Plan. That leaves 6 years of unmet need at the end of the 2042 Plan. The need might not be greater in numbers, but will be extended in years, and an acknowledgement of this from our neighbours would be helpful. We understand that we must attempt to find housing capacity where we can, but a lack of acceptance of whether or not we have cannot mean that discussions of the unmet need in the plan period to 2042 cannot take place.</p>	<p>All methodology and details behind capacity calculations to be shared.</p> <p>Formal request for unmet need to be made.</p>

South Oxfordshire District Council and Vale of White Horse District Council

<b>Draft Policy</b>	<b>Summary</b>	<b>Response</b>	<b>Outcome</b>
Draft Policy H1	Support the use of SM to inform Oxford's housing needs. We welcome the fact that with the capacity-	The SM is the basis for the calculation of the housing need.	Engagement on capacity calculations has been ongoing.

Draft Policy	Summary	Response	Outcome
	based housing target and unmet need of 14,300 already taken by surrounding district there is more than enough to cater for the amount of unmet need this plan generates. Request, as has been committed to, engagement on capacity calculations prior to Regulation 19.	At the Regulation 18 stage it was not clear whether the unmet need would be above or below the 14,300 previously agreed for the previous round of local plans. The SHLAA to support the Regulation 19 consultation finds a capacity of 9,267 over the Plan period, which gives an unmet need of 12,473.	

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H1 Housing Requirement	<p><b>Strategic Planning</b></p> <p>Using a capacity-based requirement will not meet the housing need identified through the Standard Method (Dec, 2024) and will generate an element of unmet housing need. The exact amount of unmet housing need was not set out in the PO document.</p>	Noted.	No Action Required

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>The County Council will review any updated work on capacity when it is available. The Reg. 18 document only discusses the housing requirement in Oxford and does not discuss how the arising unmet need will be addressed.</p> <p>The County is keen to understand the implications of any additional unmet housing need arising as new strategic housing allocations are likely to have infrastructure requirements (e.g., transport/ education), and other issues relevant to the County's statutory functions.</p> <p>Concerned about trip generating growth contrary to LTCP targets and whether the cost of infrastructure can be met.</p> <p>The County Council wishes to be involved in future discussions about housing need numbers and can act to support the Districts and City in highlighting issues where there are differences in approach and offering</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

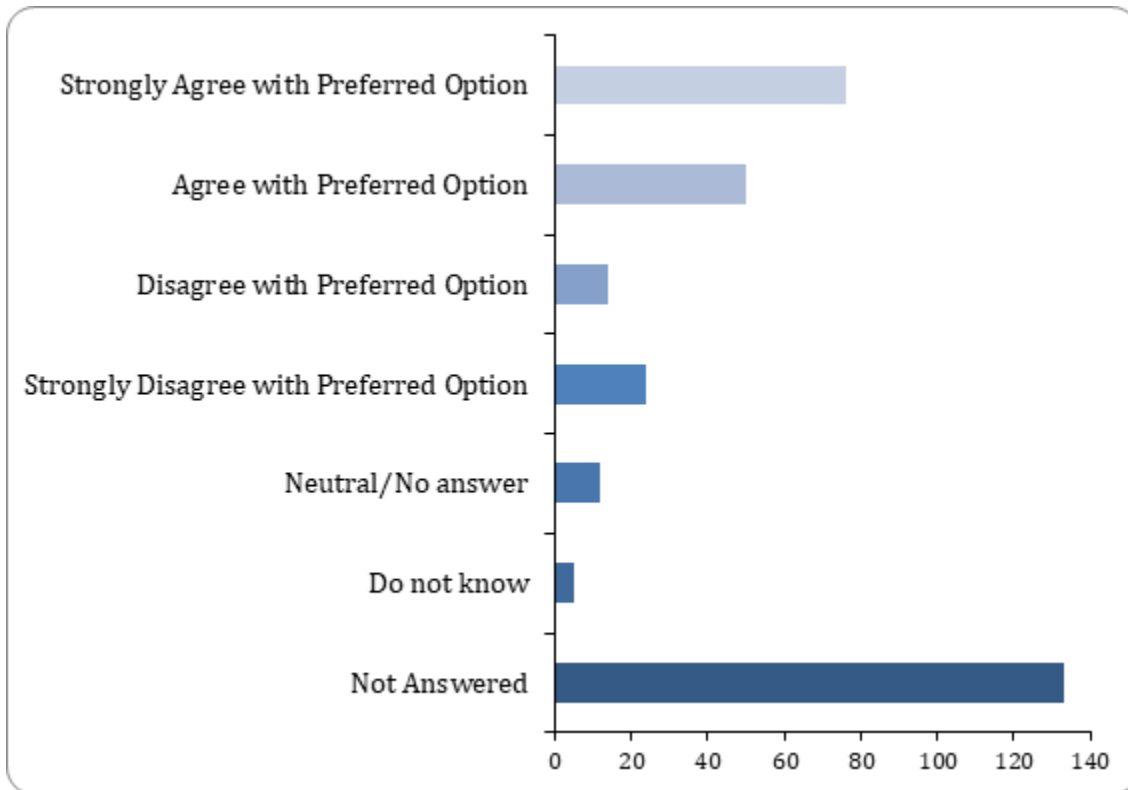
<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>a way forward for example in relation to infrastructure needs.</p> <p>The County Council’s position has been, and continues to be, that any site allocations should be well located in relation to the people they are intended to accommodate. Therefore, Oxford’s unmet housing need should be met on sites close to Oxford, either with good existing walking, cycling and public transport links or the ability to provide such links funded from development.</p> <p>The number of homes to be delivered in the 2022-42 plan period (9,851) is less than the number of homes to be delivered in the 2016-36 plan period (10,880). The Reg.19 consultation should set out the numbers and detail the reasons such as whether landowners are now not seeking to redevelop their sites and why as there could be scope for further increasing the housing requirement.</p>	<p>We look forward to continued discussions with district and county colleagues as we seek to resolve issues of unmet housing need and associated infrastructure implications.</p> <p>Noted.</p>	<p>Continue relevant discussions through DTC Forum/ etc.</p> <p>No Action Required</p>

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
		The Reg. 19 Plan and supporting evidence will include SHLAA (Strategic Housing Land Availability Assessment), which includes details of landowner ambitions for sites in the city.	No Action Required

## All Public Responses – Draft Policy H2

Please tell us what you think about policy options set 002a (draft policy H2): Affordable housing contributions.

There were 181 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	76	24.20%
<b>Agree with Preferred Option</b>	50	15.92%
<b>Disagree with Preferred Option</b>	14	4.46%
<b>Strongly Disagree with Preferred Option</b>	24	7.64%
<b>Neutral/No answer</b>	12	3.82%
<b>Do not know</b>	5	1.59%
<b>Not Answered</b>	133	42.36%



<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H2	Prioritising Social Housing	<p>Social rent should be prioritised as past policies in Oxford have not made homes genuinely affordable.</p> <p>Policy needed on limiting the number of unoccupied houses e.g. planning restrictions on short-term lets.</p>	Social rent is prioritised.
H2	Objection to reducing affordable housing target	Object to reducing affordable housing from previous target of 50% to 40%. Government policy now requires social rent, so this is a missed opportunity.	The Viability evidence indicated that it was not feasible to continue the 50% affordable housing target for this plan period. Whilst some developments would be able to deliver this rate of contribution, a significant proportion would not.
H2	Amend policy to remove viability provision	Whilst supporting the intent of Policy H2, the wording must be altered and strengthened to ensure it delivers results. Developers often cite viability to replace social rent homes with other “affordable” options, and this must be prevented. It is CPRE Oxfordshire’s view that sites which are not viable for social housing for rent should not be considered.	The NPPF requires that developer contributions should not make sites unviable
H2	Viability - justification needed for affordable housing contribution above national 20%	National policy requires a 20% affordable housing discount (Paragraph: 002 Reference ID: 60-002-20180913) so any diversion from this must consider the current viability and deliverability challenges facing the residential sector. Request that regards be given to development viability on a site-by-site basis.	The 20% minimum rent discount set out in national guidance is specific to the category of affordable private rent homes. It is not a general principle for all affordable housing types.

Draft policy	Topic	Summary of comments	Response
H2	Application of policy to BTR	More clarity needed on affordable housing requirements for build-to-rent developments. National policy states that '20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme' (Paragraph: 002 Reference ID: 60-00220180913).	Whilst the NPPF allows for BTR tenure, these types of developments are unlikely to meet affordable housing needs in the Oxford context because they are still not affordable to many people on Oxford salaries.
H2	Viability study – testing of typologies	In the plan wide viability assessment (BNP Paribas 2023) it is unclear how sheltered or extra care typologies have been tested. Typology 19 is described as 'C2 care scheme - flats' extending to 60 flats with an average GIA of 4,376 m2. It is unclear how non saleable floorspace has been factored in. Unless further testing has been undertaken specifically examining a full range of older person housing typologies, it appears that there is insufficient evidence regarding the viability of this typology. The typology tested appears to be a hybrid typology incorporating various elements of extra care and 'a care scheme'. Some clarity is required on the assumptions made to ensure that all appropriate costs are included and realistic so that a judgement can be made in respect of traditional sheltered and extra care typologies.	The requirement for affordable housing contributions from older persons accommodation applies only to self-contained units, and therefore excludes most typologies.
H2	Exemption of older persons and specialist housing from affordable housing requirement.	Various examples of LPs where affordable is concluded as not viable for older persons and specialist housing, so those developments are exempt from affordable housing contributions. Eg Fareham policy HP5, Swale LP, and Birmingham & Charnwood LP. Oxford should examine a similar exemption. By not adopting a different policy in respect of housing for older people, the policy is adding uncertainty and an unnecessary layer of cost and delay to such proposals.	The Plan Viability Assessment indicates that in the context of Oxford, a significant proportion of these development typologies would be able to deliver affordable

Draft policy	Topic	Summary of comments	Response
		<p>See the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note')). The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process. Sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling. Sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales/occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling and amended accordingly. These longer sales periods should therefore be incorporated into the Viability Assessment, especially for sheltered housing. It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost - to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This</p>	<p>housing contributions as part of a viable proposal.</p>

Draft policy	Topic	Summary of comments	Response
		<p>increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff, and services and reflecting a slower sales rate than Retirement Living. PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers.' However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people.</p>	
H2	Support for policy	<p>We support this policy and believe that new affordable homes should be at genuinely and permanently affordable social rents.</p>	Support is welcomed
H2	Glossary Definition of affordable housing	<p>Refers to glossary definition of affordable housing (page 184 of draft document). It is unclear whether the phrase Affordable Private Rent used in a iii) and Affordable Rent used in a i) are intended to be the same.</p>	<p>Affordable rent is defined as at least 20% below market rents, and Affordable <i>Private</i> rent would also be at least 20% below market rents but is a class of affordable housing specifically defined by national policy</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			for Build to Rent developments.
H2	Appendix 2.1 - Method for calculating affordable housing contributions	'D' is not described sufficiently clearly and should be clarified.	Noted, will review definitions in Appendix.

## Statutory Consultee Responses – Draft Policy H2

South Oxfordshire District Council and Vale of White Horse District Council

<b>Draft Policy</b>	<b>Summary</b>	<b>Response</b>	<b>Outcome</b>
Draft Policy H2	The preferred tenure split of 80% social rented does not align with the Specialist Housing Needs Assessment, which gives a 65:35 split.	The tenure split is aimed at prioritising and maximising social rented housing because it meets the needs of those in greatest housing need.	No further action.

Oxfordshire County Council

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
<p>Policy H2 Delivering Affordable Homes</p>	<p><b>Strategic Planning and Infrastructure teams</b></p> <p>It is disappointing that the AH requirement is being reduced from 50% to 40%. We understand that the 40% requirement is based on viability.</p> <p>It is not clear why delivery of the government mandated proportion of 'First Homes' is not expected.</p> <p>In relation to 'unmet need' housing sites, would the emerging Oxford Local Plan's 40% requirement undermine the currently adopted 50% requirements in neighbouring district's local plans. We have also raised a similar query in our comments on the recent Cherwell Local Plan Regulation 18 consultation where 30% affordable housing is proposed to apply to new</p>	<p>The Local Plan viability study provides evidence for affordable housing and other proposed policy requirements</p> <p>Footnote 31 to paragraph 66 of the December 2024 NPPF sets out that First Homes are no longer mandatory but instead can be delivered where local planning authorities judge they meet local need.</p> <p>Sites allocated in neighbouring authorities' local plans to meet Oxford's unmet housing need are outside the jurisdiction of the city. It is for each individual authority to set policies for planned development in their areas.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>sites, but 50% affordable housing requirements apply to some existing allocated sites.</p> <p>The County Council has a particular interest in affordable housing given its social care role. We want to see provision being made for affordable forms of housing catering for those who are older or who have specialist needs, particularly in the form of affordable extra care housing which is set in our Market Position Statements on this topic.</p> <p>In the Districts, we are asking for a requirement in those Local Plans to provide an affordable extra care housing development of at least 60 units as part of the affordable housing component of very large sites. We do not think there are any proposed allocations in Oxford City where such a requirement would be suitable, as sites are smaller. Even Oxpens is expected to be an unsuitable site for such a requirement. We anticipate some extra care housing being delivered at a small number of sites in adjacent Districts to meet the City's need e.g. at Bayswater Brook. We would be</p>	<p>Noted (see box H4 below).</p> <p>Noted.</p>	<p>No Action Required</p> <p>No Action Required</p>

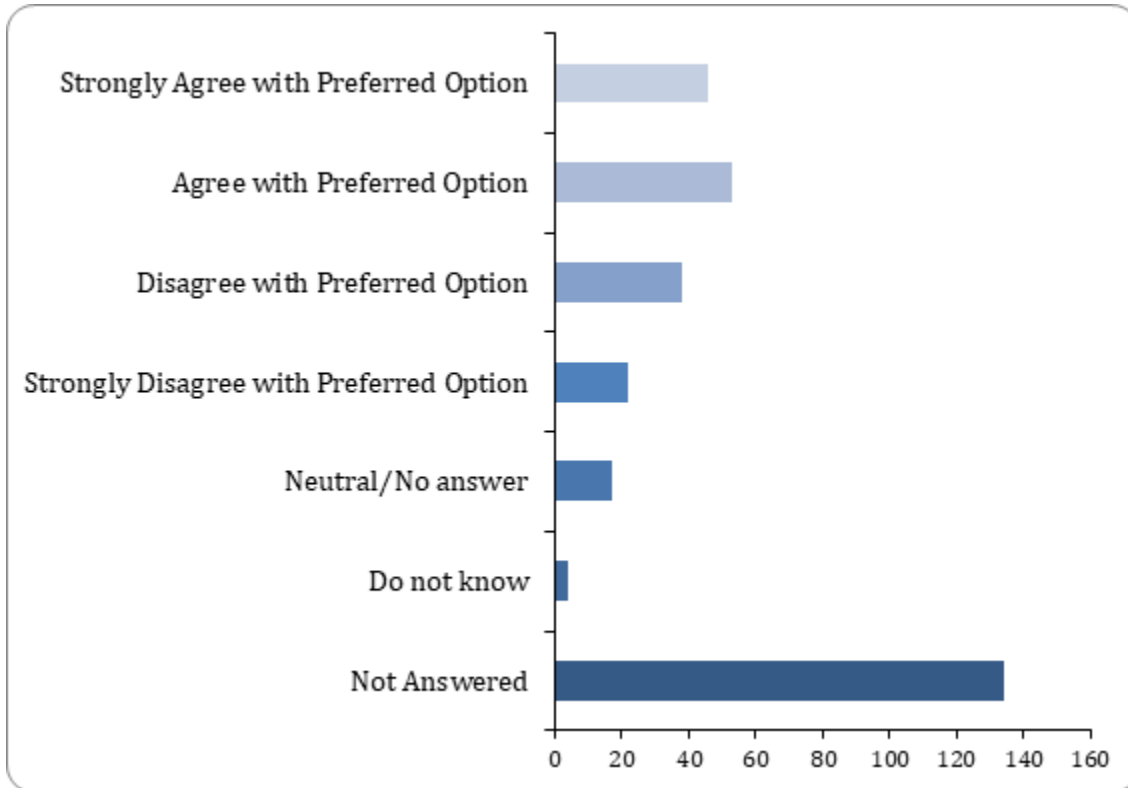
<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	concerned if a reduced affordable housing threshold makes it more difficult to get affordable specialist housing provided on sites.		



### All Public Responses – Draft Policy H3

Please tell us what you think about policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	38	12.10%
Strongly Disagree with Preferred Option	22	7.01%
Neutral/No answer	17	5.41%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H3	Support for policy	<p>The approach to the supply of conventional affordable housing, as a financial payment which is subject to viability (as set out in Policy H3) is broadly supported.</p> <p>Support the caveat which does not require affordable housing contributions from student accommodation which is on sites which are within an existing or proposed University or College Campus site. With regards to PBSA development that falls outside of these categories, we recognise the PBSA to conventional housing ratio is 2.5:1, we therefore consider this policy to be appropriate.</p> <p>The University should be providing a lot more houses. The City is turning into a student campus. Developments are for students at the expensive of residents who actually pay council tax. The Universities should be made to contribute more to the City and residents.</p>	Support is noted. The emerging policy seeks financial contributions towards the delivery of affordable housing from PBSA developments of 24 or more student units, reflecting the 2.4 ratio set out in the Housing Delivery Test measurement rulebook.
H3	Objection to policy	It is not clear from the Council's evidence base that there is any justification to support this policy, without rendering development for student accommodation unviable.	Viability testing for LP2045 indicates contributions from PBSA are viable.
H3	Objection - Unjustified	In line with previous comments to the withdrawn Local Plan, the Universities do not support this option given that student accommodation is already an affordable form of housing that relieves pressure on the University of Oxford and Oxford Brookes University wider housing market. The controls over location of student accommodation mean that there is limited competition with mainstream housing, which means this policy is unlikely to be justified.	Noted.
H3	Support for alternative option	A number of people said they preferred alternative option 1 rather than the Preferred Option. Comments in support of this include:	The reasons for the preferred option are set out in background paper 002.

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>• the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students.</li> <li>• Education establishments MUST make a greater contribution to Oxford than is presently the case.</li> <li>• All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development.</li> <li>• We recognise that students do not pay council tax, and in many cases there is also no CIL payable if the institution has charitable status exemption. We therefore believe that all purpose built student accommodation should make a financial contribution to housing by way of compensation.</li> <li>• All initiatives to fund further affordable housing should be pursued.</li> <li>• The draft plan itself states that many sites for student accommodation could equally be suitable for non-student homes. The plan also makes it clear that contributions will not be required from either proposals within existing or proposed university or college campus sites OR renovations of existing sites. i.e. they will only be required from units creating a net gain. Although the plan voices a concern in that “any contributions should not disadvantage the delivery of sites,” the delivery of new sites should not be at the expense of housing for Oxford residents. Any funds raised could contribute towards buying back existing family housing currently used to house students.</li> </ul>	

Draft policy	Topic	Summary of comments	Response
H3	Support for alternative option	Prefer alternative option 3 because this might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with concentrations of social housing in only some neighbourhoods where more social housing concentration is accompanied by anti-social behaviour, drug dealing, fly-tipping, unkept rubbish strewn bins and gardens etc. It is better that student areas take some of the social housing load, as do all other areas, including affluent areas etc.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternative option	The Plan itself concedes that “any contributions should not disadvantage the delivery of sites,” and notes that on-site affordable units are seldom practical in PBSA. A more supply-led, proportionate approach would either (i) apply the contribution only to <b>**larger schemes—say 50 rooms or more—**</b> or (ii) forgo it altogether where the development demonstrably substitutes for private HMOs. By keeping the pipeline of student accommodation flowing, Oxford maximises both housing choice and affordability without relying on complex transfer payments that can inadvertently choke off the very supply the city needs.	The reasons for the preferred option are set out in background paper 002.
H3	Policy/ glossary wording mis-alignment	<p>Exemption from contributions towards affordable housing provision welcomed for new student accommodation that is within an existing or proposed university or college campus site. This exemption must include the Centre for Islamic Studies sites on Marston Road (i.e., Government Buildings and Harcourt House) as development of student accommodation is integral to the development of academic and institutional facilities.</p> <p>Currently the glossary definition does not reflect the draft policy requirements. The draft policy suggests that existing and proposed</p>	The sites referred to are in use as a car park and a small business estate/ cadet accommodation. If these sites come forward for development that meets the definition of ‘campus development’ that matches what they are allocated or proposed for, then they will be exempt from the policy. For clarity, the Glossary has been amended to say:

Draft policy	Topic	Summary of comments	Response
		campuses should be exempt from the requirement for financial contributions, while the glossary definition only includes existing campuses. The glossary should be updated to include proposed campuses, including the Centre’s allocated sites, to properly reflect policy H3 and avoid future confusion.	Campus: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special facilities) and/or administrative uses (offices and administrative functions).
H3	Applicant specific text  Modification/ amendment	At each and every Local Plan, Oxford City Council has tried, under pressure, to give existing Universities preferential treatment, each and every time the Inspector throws it out as a policy cannot be dependent on applicant identity.  Remove applicant specific text, make effective	Draft Policy H3 only contains “applicant specific text” in relation to the locations/ circumstances where affordable housing contributions will not be sought from purpose-built student accommodation.
H3	Seeking exemption from contributions towards affordable housing	Lincoln College is promoting an existing College site for graduate accommodation - the site would not be suitable for market housing. Seeking confirmation (via pre-app advice) that contributions would not be required for affordable housing.	The glossary definition of ‘campus’ is: Accommodation occupied by an educational institution and comprising academic institutional uses including academic (teaching, seminar and lecturing spaces), research (laboratories and special

Draft policy	Topic	Summary of comments	Response
			<p>facilities) and/or administrative uses (offices and administrative functions).</p> <p>The site being promoted is currently in use as sports provision, there is no existing accommodation and therefore contributions are likely to be required for affordable housing.</p>
H3	General comment	<p>As well as the locations listed in the policy, we support student accommodation being provided on arterial roads. These locations are generally sustainable for public transport and active travel, and these busier locations can be more suitable for young people than families. Students can also be very beneficial for local shops on arterial roads, as demonstrated by Iffley and Cowley Roads in East Oxford.</p>	<p>Draft Policy H10: Location of new student accommodation sets out where planning permission would be granted for student accommodation. 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. Allowing student accommodation along arterial routes has the potential to significantly change their character which could have a negative impact on the local community.</p>
H3	General comments	<p>This is an unwarranted tax on landlords and students.</p> <p>This is totally mixing up objectives and unnecessarily skewing aims and outcomes.</p>	<p>Securing contributions towards affordable housing from new purpose build student housing can contribute towards the supply of</p>

Draft policy	Topic	Summary of comments	Response
		<p>I assume the contribution is from the developer, not the students.</p> <p>I think the financial burden will fall ultimately on students. If you are proposing to do this then you are probably considering to provide too much affordable housing.</p> <p>Please don't do this! Just get on with building housing and don't slow things down with restrictions!! The need to take pressure off the ladder is the main thing. Fine tune in later years! Housing is a crisis the important thing is to make rapid progress!</p> <p>You should force the university/colleges to provide one accessible dwelling for every student accommodation room it builds.</p> <p>I think there is a balance that needs to be struck between student housing and other housing, both affordable and general housing requirement. This city, especially some parts of it, is in danger of being swamped with student housing, either new built or in existing stock (i.e. HMOs)</p> <p>The policy is unjustified as the economic gain or loss will be the same for existing or new campuses or institutions, further, provision of student housing of itself removes students from the housing market. Ineffective as student accommodation can be provided by non-university institutions (Boarding schools, Language schools)</p>	<p>affordable homes as many sites for student accommodation could equally be suitable for non-student homes, from which a percentage of affordable housing would have been sought.</p> <p>The preferred option seeks to strike a balance between the accommodation needs of students and other types of housing.</p> <p>Payment liability would fall on the applicant/ developer.</p>

Draft policy	Topic	Summary of comments	Response
		<p>All of these screams are pushing prices up for the consumer, in this case the students, which already have difficulties paying back their loans.</p> <p>This is a problem created by a University that follows a blind 'growth is good' mantra, at whatever costs to the city.</p> <p>Student accommodation makes this place more soulless and is expensive, meaning that this further contributes to making oxford the most unfair place to live - is your future for oxford a place for the born wealthy, foreign investors and every street looking the same?</p>	
H3	Higher thresholds required.	<p>The current thresholds is insufficient, it should be less than the 10 unit or 25 room threshold as this creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small.</p> <p>The financial rate per room should be higher.</p> <p>We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments.</p> <p>Every new purpose-built student room pulls a student out of the private rental market, easing pressure on family homes and reducing overall rents. Policy H3's low threshold—financial contributions from schemes as small as 25 beds or ten self-contained units—risks slowing delivery of this dedicated stock, because the levy is set on a</p>	The threshold is as same as that for residential developments.



Draft policy	Topic	Summary of comments	Response
		comparable basis to residential development and calculated against land value.	
H3	General Comment	Student developments should make contributions to local leisure and entertainment hubs. One problem with the city is there are only a couple of social focal points (Cowley road/Jerico). This is part of the traffic and transport problems, everyone is trying to get to the same place. New Student developments should create/seed those sort of hubs in new places.	The policy seeks contributions towards affordable housing as this can help contribute towards the supply of affordable homes in Oxford.
H3	General Comment	The student housing sector should play a stronger role in supporting affordable housing in the wider community.	Noted.
H3	Viability	In a city where suitable sites are scarce and landowners already face a menu of Section 106 and CIL costs, even a modest per-bed charge can tip marginal schemes into non-viability.	Viability testing for LP2045 indicates contributions from PBSA are viable.
H3	General Comment	The present situation has led to student accommodation being developed on a commercial basis because it is more profitable than other housing. 25 student rooms are enough to cause a significant impact on a neighbourhood and it is important that developments of this size are sensitively done and with proper management organised and not just put up wherever a developer can find a space. NB This policy should apply to university and college developments and not just commercial ones.	The policy does not apply to development within university campus sites or redevelopment of existing PBSA that is currently and will continue to be owned and/or managed by the universities. This is because development on those sites would not displace mainstream residential development or reduce opportunities for the provision of affordable housing.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H3	Support for alternate option	Why should student housing developments contribute to 'affordable housing'. Building student accommodation takes students out of other housing stock releasing it for general use. The whole concept of subsidised housing is unfair. If the city needs and the market can support student housing, let it built and do not tax it differently.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Students are on the lowest incomes in the city, requiring additional contributions to push up their rent is wrong. I favour option e.	The reasons for the preferred option are set out in background paper 002.
H3	Support for alternate option	Decent student accommodation is key to the city and should not be discouraged.	The reasons for the preferred option are set out in background paper 002.
H3	General comment	Prefer to seek a financial contribution from all student accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002.

### Statutory Consultee Responses – Draft Policy H3

Oxfordshire County Council

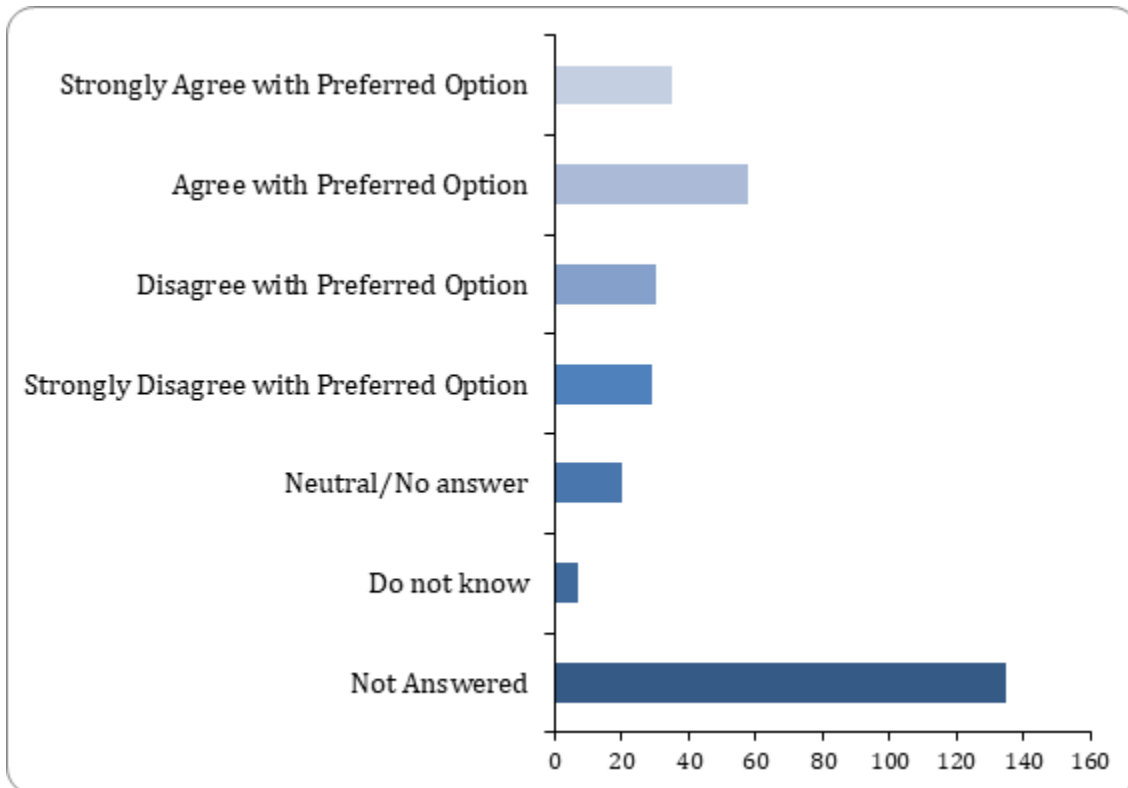
<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy H3 AH financial	<b>Strategic Planning</b>	Noted.	No Action Required

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
contributions – student acc.	This is a matter for the City Council. We agree with the preferred option to seek funding for affordable housing to be delivered on other sites.		

## All Public Responses – Draft Policy H4

Please tell us what you think about policy options set 002c (draft policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	35	11.15%
Agree with Preferred Option	58	18.47%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	29	9.24%
Neutral/No answer	20	6.37%
Do not know	7	2.23%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H4	Comments in support of policy	<p>As most older-person accommodation development is going to be increasingly by commercial entities they too must contribute more to Oxford.</p> <p>Ambivalent between preferred option and alternative 1.</p>	Support noted.
H4	Alternative options	<p>Several comments support alternative option 1 – i.e.:</p> <ul style="list-style-type: none"> <li>• housing developments for old people shouldn't be approved with free rein for profit only- they must contribute to society. The only exception to this should be if the development is converting disused or derelict buildings or brownfield sites,</li> <li>• Having a threshold of more than 10 self-contained units creates a loop-hole for developers to build smaller developments on the remaining sites - which are by definition going to be small, All new developments of this kind should have a duty to contribute towards affordable housing given the need in Oxford, no matter the size of the development.</li> <li>• Agree with Option 1 or a lower limit for the preferred option, the same as for student housing.</li> <li>• We should not unfairly impose additional costs on developers building larger developments while not imposing them on smaller developments.</li> <li>• All affordable and all financially contributing</li> </ul> <p>Some comments were in support of alternative option 2 – i.e.</p> <ul style="list-style-type: none"> <li>• Every new unit of specialist older-persons housing allows a household to “right-size”, releasing larger dwellings back to the general market and easing city-wide affordability</li> </ul>	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

Draft policy	Topic	Summary of comments	Response
		<p>pressures. Oxford faces a need for roughly 1,100 extra-care and supported units by 2042, yet suitable sites are scarce and typically small. Imposing an affordable-housing levy on schemes of just 10 self-contained units—the draft H4 threshold —risks deterring precisely the modest, infill developments that can be delivered quickly within the city boundary.</p> <ul style="list-style-type: none"> <li>• The Plan acknowledges that on-site provision is usually inappropriate for retirement complexes and that viability testing must not “disadvantage the delivery of sites”. In a high-cost land market, even a well-intentioned payment-in-lieu can erode residual land value to the point where owners hold rather than redevelop. The result would be fewer specialist units, slower turnover of under-occupied family homes, and greater pressure on adult-social-care budgets. A calibrated, supply-led policy would therefore: Apply the contribution only to larger schemes (≥ 20 units) where economies of scale exist, or waive it where a proposal demonstrably frees general-market housing.</li> <li>• By raising the threshold, Oxford would secure more specialist accommodation and, indirectly, more family housing—advancing both affordability and welfare without constraining vital supply (only levy contributions on schemes of 20 + units)</li> </ul> <p>Comments in support of alternative option 3:</p> <ul style="list-style-type: none"> <li>• This option might reduce the creation of social housing ghettos, by distributing social housing more evenly across neighbourhoods, and not creating "estates" with concentrations of social housing in only some neighbourhoods.</li> </ul>	

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>• It is better that older person areas take some of the social housing load, as do all other areas, including affluent areas etc.</li> </ul> <p>Others preferred alternative option 4 commenting as follows:</p> <ul style="list-style-type: none"> <li>• Don't discourage accommodation for the elderly from being built.</li> <li>• Bespoke accommodation for the elderly makes it easier for people to downsize, freeing up houses elsewhere.</li> <li>• There should be no requirement for contributions from older persons accommodation. Such accommodation at reasonable cost would encourage older people to downsize and so release family sized housing which is badly needed. At present there is very little housing for older people in Oxford suitable for people who do not need or wish to move into a care home.</li> <li>• This type of development needs to be encouraged and could free up housing stock.</li> </ul>	
H4	General Comments	<p>Self-contained older-persons accommodation will increasingly be necessary - this isn't a money-making enterprise (unlike student accommodation) - and the low-paid people who work at them will need to live somewhere close too. Affordable housing should accompany self-contained older-persons accommodation, but not to the point at which no developers can afford to build self-contained older-persons accommodation.</p> <p>I would prefer specifying seeking contributions from private and for-profit older-persons developments.</p>	The policy allows for a pro rata approach to determine the level of contributions for mixed use developments. Contributions are not being sought for developments of less than 10 self contained units.

Draft policy	Topic	Summary of comments	Response
		<p>This is totally mixing up objectives and unnecessarily skewing aims and outcomes.</p> <p>Keep the formula transparent and subject to viability review, avoiding ad-hoc negotiations that add delay.</p> <p>Prioritise rapid delivery of age-appropriate homes—through gentle density and mid-rise formats—as the most effective, market-driven path to affordability city-wide.</p> <p>Let the market decide the cost of housing and what should be built, not interventionist policies to benefit preferred groups. If the city needs units for the elderly then let it get built without extra penalty.</p> <p>Old people on pensions are often on fixed incomes. Rental prices are already so expensive in oxford.</p> <p>Affordable housing needs a rethink before you start claiming money from everyone for it.</p> <p>Again a hidden tax on people who want to retire.</p> <p>Another unwarranted tax.</p>	
H4	General Comment	<p>The preferred option appears to penalise older retired people rather than the developers - the main one being the University - who are pushing for constant growth and profit at whatever costs to residents. Their fixation on growing the University and providing profitable</p>	<p>Payment liability would fall on the applicant/ developer.</p>



Draft policy	Topic	Summary of comments	Response
		accommodation for students is why there is pressure on housing/places for older people.	
H4	General comment	Prefer to seek a financial contribution from all self-contained older persons accommodation developments, but towards social rent housing rather than "affordable".	The reasons for the preferred option are set out in background paper 002. The policy seeks to strike the right balance.

## Statutory Consultee Responses – Draft Policy H4

Oxfordshire County Council

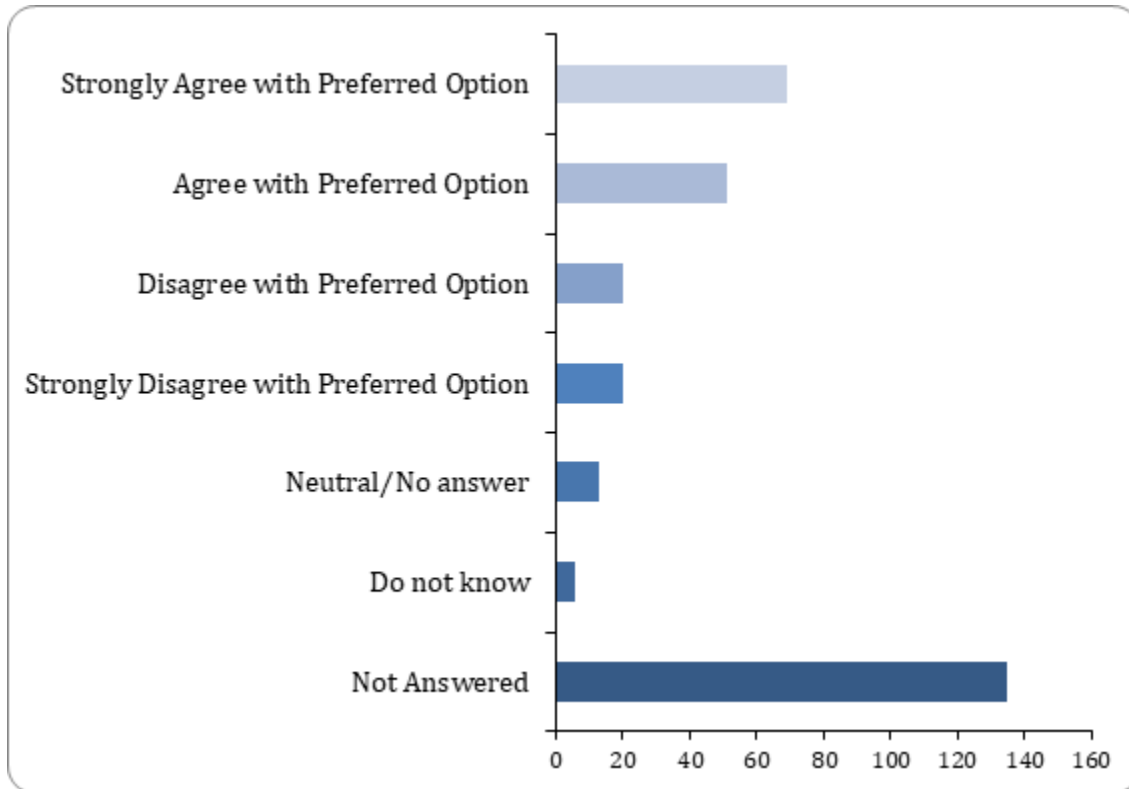
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H4 AH contributions from self-contained older persons acc.	<b>Strategic Planning and Infrastructure teams</b> In order to deliver affordable extra care housing units, generally a minimum of 60 units are needed for a scheme to be viable. Therefore, if the requirement for affordable housing is 40%, we would agree that unless a total of 150 units are proposed, it may be difficult to separate off an affordable element of extra care housing.	Noted.	No Action Required

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>Nothing in text that specifically ring-fences contributions from older persons housing to deliver affordable extra care accommodation. It appears that the contributions gained from affordable housing on self-contained older persons housing will, like other contributions, go into a pot for affordable housing generally.</p> <p>The County Council would like to see some provision being made within the affordable housing pot for extra care housing for older people and specialist needs. This may not need to be addressed by any change of policy in the Local Plan, but instead by a working arrangement, perhaps addressed through a memorandum of understanding. The contributions could be pooled into a pot for future supported housing projects.</p>	<p>That is correct. There is no specific ring-fencing of contributions for affordable extra care housing.</p> <p>We will continue a dialogue with the County Council on this issue, which could be addressed outside of the plan-making process.</p>	<p>No Action Required</p> <p>No immediate action required related to the plan-production process however further discussions with county colleagues may be required in the future.</p>

## All Public Responses – Draft Policy H5

Please tell us what you think about policy options set 002d (draft policy H5): Affordable housing: financial contributions from new commercial development.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	69	21.97%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	13	4.14%
Do not know	6	1.91%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
H5	Lack of evidence base	<p>No clear evidence has been provided showing a causal link between commercial floorspace and additional affordable housing need. No analysis has been undertaken that relates to job creation by use class, the share of workers needing housing locally, or the portion of need attributable to individual schemes. The policy also lacks clarity on key matters, such as the calculation methodology.</p>	<p>The calculation is set out in the Draft Submission Oxford Local Plan. Employees are people and people need to live in homes, and there is a significant need for affordable housing in Oxford, so the policy approach is considered justified.</p>
H5	Support option c	<p>Multiple responses from developers support option c. Requiring contributions would harm commercial investment in Oxford. A similar policy to option a) was tested and found unviable between 2001-2016. It is unhelpful that there is no up-to-date viability assessment in support the proposed policy.</p> <p>Seeking a contribution would not meet all three tests for planning obligations set out under Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development.</p> <p>The current market cannot absorb the additional costs, especially after a recent large increase in commercial property charges (CIL) ie. a 400% increase in the levy charges for Class E, B2 and B8 uses. Regarding option a), major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line. Regarding option a) and b), OCC have not undertaken and/or published a viability assessment at this stage. OCC should ensure that the viability assessment contains careful analysis on development at Botley Road</p>	<p>The viability assessment shows this approach is viable. The 2036 Plan did not include this approach as it was no longer viable. The viability profile has changed considerably. The Draft Policy is very clear that this requirement applies only to new developments.</p>

Draft policy	Topic	Summary of comments	Response
		<p>Retail Park, Osney Mead and other commercial developments coming forward.</p> <p>In the absence of additional supporting text and draft policy wording for option b, there are also concerns over contributions being applied more than once to the same site and development. Should such a policy be adopted (either in the case of Option A or Option B), safeguards would need to be put in place in the policy and supporting text, limiting its application to new developments only. The policy should be clear in stating that it is not applicable to: (i) any subsequent changes of use applications between the employment land use classes; or in relation to (ii) any applications relating to alterations or extensions to the new buildings. Without these safeguards in place, the viability of maintaining and improving existing employment buildings for future use will be called into question, particularly during downturns in the economy.</p>	
H5	Support option c-reduced chance social housing ghettos	Anti-social behaviour problems partially caused by an over-concentration of social housing would be reduced- better that commercial areas take some of the social housing load.	Comment noted.
H5	Small sites too	Unfair to impose additional costs on developers buildings larger developments, but not smaller ones.	The threshold is consistent with national guidance on when these contributions are required.
H5	Support option b, expressing concern about option a	Multiple responses support option b but emphasise that this is without seeing a viability assessment. Carefully consider the impact on local and national economy, particularly key employment and revenue generating sectors such as life sciences, research and innovation. These sectors are critical to the city's long term economic resilience and global competitiveness. For instance, the risk of making	The viability assessment fully reflects other needs and requirements such as contributions to the Cowley Branchline and the update CIL Charging Schedule. The

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		investment in the Oxford Knowledge Cluster unattractive compared to other locations where such levies are not in force. Impact on OUH. The commercial success of these sectors is steadfastly in the national interest and central to government policy as set out within the Government's 'Plan for Change' and incorporated in to key national policy within the 'Modern Industrial Strategy' (June 2025) and 'National Planning Policy Framework' (December 2024). Closer to home, undermining the commercial viability of development risks the delivery of the significant infrastructure needs, such as the Cowley Branch Line. Brining housing to employment sites brings activity at otherwise quiet times.	contributions are set at a level that is well within what is assessed to be viable, keeping in mind all costs and other requirements.
H5	Support for option a (preferred option)	All employment sites require workers, and a proportion of them will require affordable housing. These sites generate significant profits and drive up land values, reducing available space for the community, so they should contribute to addressing the housing crisis by contributing to the cost of providing affordable housing.	Support welcomed.

## Statutory Consultee Responses – Draft Policy H5

Oxfordshire County Council

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy H5	<b>Strategic Planning</b>	Noted.	No Action Required

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
AH: financial contributions from new commercial development	<p>This is a matter for the City Council. We agree with the preferred option to seek financial contributions from new commercial development subject to further viability studies which could assist meeting the need for affordable housing.</p> <p>It is understood (and important) that this affordable housing contribution will be in addition to s106, CIL and Cowley Branch Line contributions (as needed).</p> <p>The County Council would like to highlight the importance that this requirement does not jeopardise the delivery of sites which can contribute to necessary infrastructure, in particular related to the Cowley Branch Line.</p> <p><b>Minerals and Waste Policy and Strategy</b></p> <p>Commercial developments to which the policy applies should be defined in the glossary.</p>	<p>The viability testing makes assumptions for S106, CBL contributions (as needed) and CIL.</p> <p>The viability testing makes assumptions for CBL contributions.</p> <p>The policy will need to set out which developments it applies.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>Oxford City Action: set out development</p>

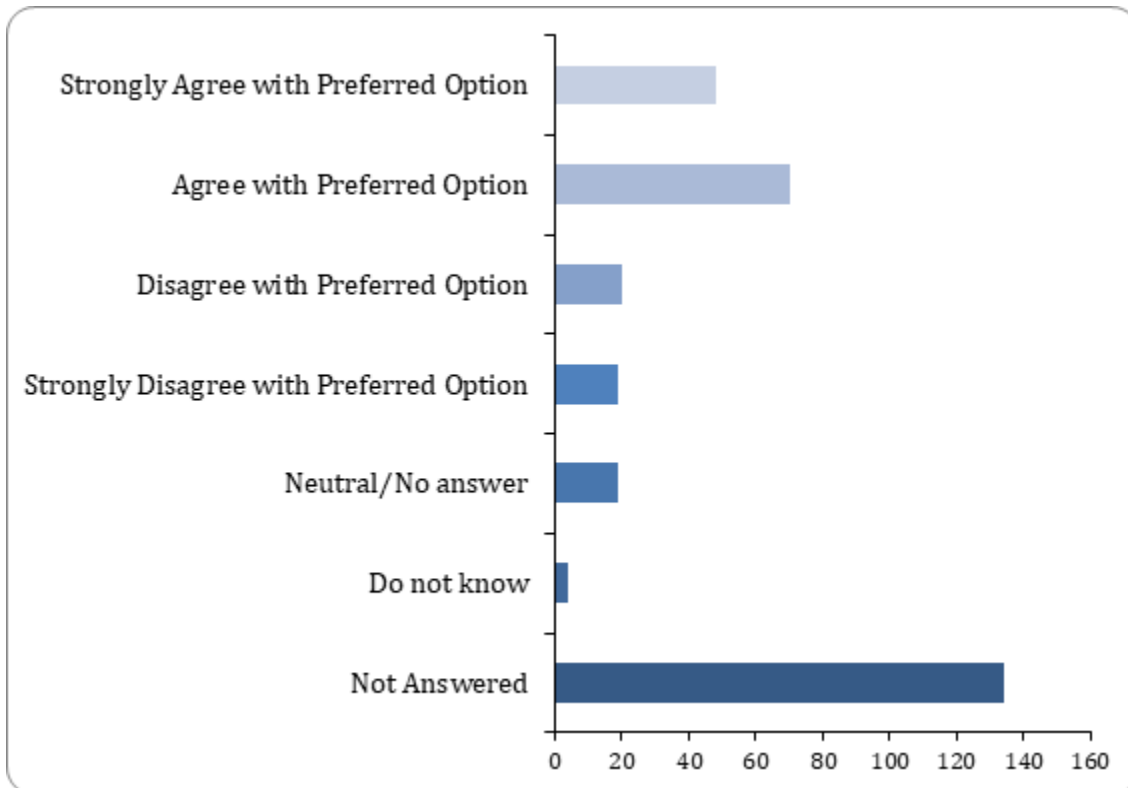
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
			types to which the policy applies



## All Public Responses – Draft Policy H6

Please tell us what you think about policy options set 002e (draft policy H6): Employer-linked affordable housing.

There were 180 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	48	15.29%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	19	6.05%
Neutral/No answer	19	6.05%
Do not know	4	1.27%
Not Answered	134	42.68%

Draft policy	Topic	Summary of comments	Response
H6	Support for policy	Multiple comments express support for the policy as it aligns with the definition of Affordable Housing in the NPPF that identifies that homes “for essential local workers” can be considered as part of any requirement.	Support welcomed.
H6	Add site 024 into policy (Government Buildings and Harcourt House)	Consider that specific reference should be made to site 024 (Government Buildings and Harcourt House) within policy H6. Rationale is set out below: The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration or other essential, on-site support services. The city’s restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.	Policy H4 in the draft Regulation 19 Plan indicates that the sites identified as appropriate for employer-linked affordable housing includes “Campus sites of the colleges of the University of Oxford and of Oxford Brookes University. These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing”.
H6	The main employer in the city should deliver new homes for their staff or provide significant contributions to	Ever increasing expansion of the main employers – Oxford University, OUHT and Brookes, BMW, are the root cause of housing need in the city. The Headington hospitals (e.g., JR, Churchill and NOC) have capacity for 1000s of homes in highly sustainable locations, by developing existing car parks for new homes would reduce the need to travel and save the surrounding countryside and the few remaining green spaces in the city. Either employers in the city should provide	Policy H3 in the Draft Submission Oxford Local Plan is aimed at helping address the housing need created from new employment. Policy H4 enables employers, in certain circumstances, to provide for their own staff.

Draft policy	Topic	Summary of comments	Response
	<p>housing delivery in the city</p> <p>Proposed Modification</p>	<p>housing or pay significant contributions towards new homes based on their increasing staff numbers. They cannot simply create housing need, traffic problems and dump the consequences onto the taxpayer and ordinary citizen. The policy is too complex and restrictive. Better solutions such as allowing market housing or straight sale of land would provide more homes.</p> <p>Mandatory contributions to housing with discounts where on-site housing is provided, and further discounts where destination parking space is used. Allow market component as incentive to delivery. General housing should be allowed. A contribution to housing stock is valuable however it is delivered and should be determined by the landowner. Sites should not be listed as this is not effective as the list given is not the same as the Site Policies, Headington Hall and Ruskin are both absent.</p>	
H6	No justification for policy	<p>We are concerned that Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach. We accept that the controls identified in criteria a) to e) should be controlled through a legal agreement, however we consider that criteria f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council.</p> <p>We therefore request that the policy is modified to read as follows:  “ f) A legal agreement will be required to secure the benefits of this policy. <del>In addition, the legal agreement will be used to: i) agree the allocations policy; ii) agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months; iii) agree that if the employer decides they no longer have a</del></p>	The legal agreement to secure the affordable housing policy as negotiated with the applicant is considered a reasonable approach, necessary to ensure the benefits are realised.

Draft policy	Topic	Summary of comments	Response
		need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied. ”	

## Statutory Consultee Responses – Draft Policy H6

Oxfordshire County Council

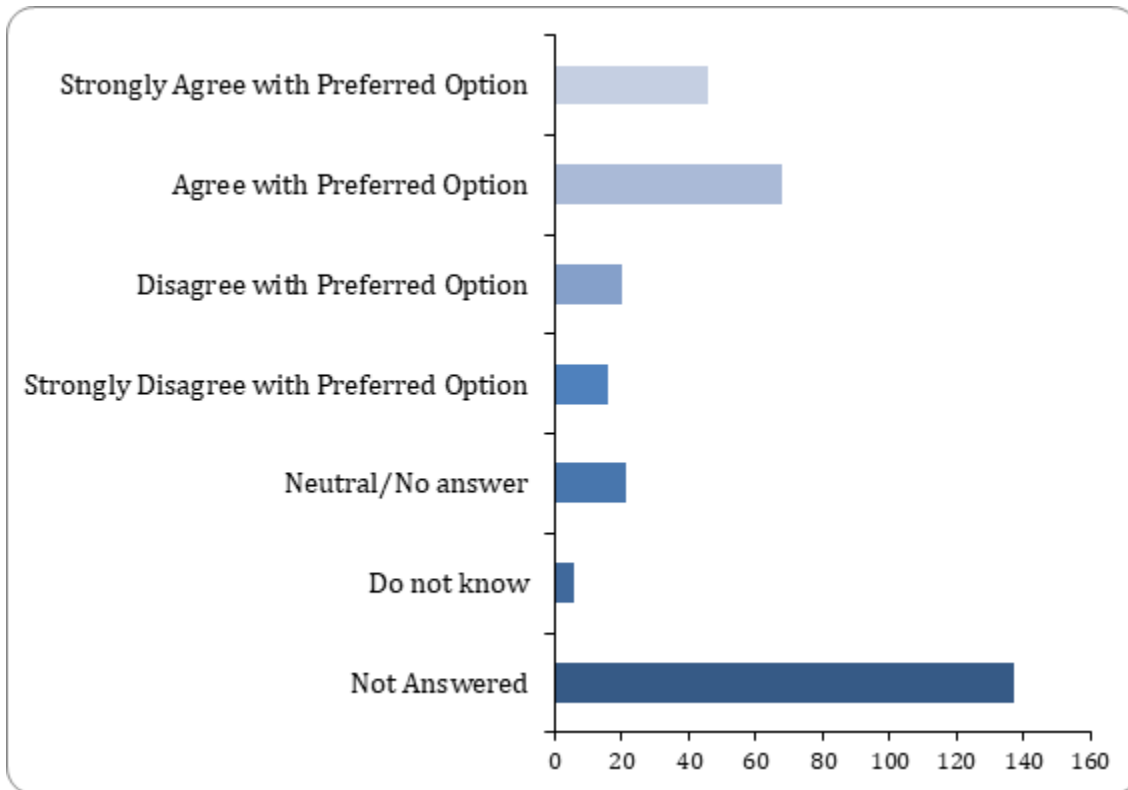
Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
Policy H6 Employer-linked AH	<p><b>Strategic Planning and Infrastructure team</b></p> <p>The County Council has published a draft Adult Social Care Workforce Strategy, which outlines higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals.</p>	Noted.	No action required.
	<p>We welcome the recognition in Policy H6 and some site policies of the need for employer-linked affordable housing to provide homes for key workers. We can provide further advice if needed about the ongoing need for key workers undertaking multiple social care roles.</p>	Noted.	No action required

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
	<p>It is noted that the third paragraph of this policy reads: “Where this policy is applied, the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site, or under those circumstances identified under criterion h).” however there is no criterion h) either under Policy H2 of H6.</p>	<p>We will review the policy and make sure that internal references are correct.</p>	<p>Oxford City Action: Ensure that policy criteria are correct and correctly referenced</p>

## All Public Responses – Draft Policy H7

Please tell us what you think about policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms).

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	68	21.66%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
H7	Application to BTR	The Council could usefully clarify whether the Mix of Dwelling Sizes (Policy H7) applies to Build to Rent (BTR). It is very uncommon for BTR to accommodate 4-bedroom units as the Council's evidence base recognises.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.
H7	Policy should specify space standards as well as housing mix	CPRE are supportive of the mix of dwellings but are concerned that on recent housing developments the social rent / affordable element is mostly made up of one or two bedroomed flats often located in blocks adjacent to main roads. Since the lack of housing for those in need is one of the main drivers for allowing development in the first place a minimum floor area should be set for the social/ affordable element as a condition for planning permission rather than only the number of units.	We will continue to apply the Nationally Described Space Standards to new residential development, including for the affordable element. This policy outlines minimum floor areas for different dwelling types and occupancies.
H7	All staff housing schemes should be exempt	The preferred option for Policy H7 sets out a prescribed housing mix, which proposals for 25+ homes, or sites of 0.5ha+ are expected to comply with, unless it can be shown not to be feasible. Employer-linked affordable housing is exempt from this requirement; however, it is considered that all staff housing schemes should also be exempt on the basis that they are likely to have their own bespoke housing requirements. Contrary to wider ambitions within the plan for making efficient use of land, requiring all schemes to comply with the prescribed housing mix may also preclude higher density developments, in locations where they may otherwise be appropriate.	H7 allows flexibility for proposals to respond to site context and local needs, as well as market demand and design considerations. The prescribed housing mix only applies to the affordable element, and there is flexibility in the policy if it can be shown as not feasible on a specific site.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H7	New policy: extensions	Many houses in Oxford are getting extensions, suggesting that houses are too small in general. Houses should be built to easily have one or two bedrooms added in a logical place. This would keep the initial price down and allow affordable extensions in the future.	National policy/permitted development rights already allow for modest household extensions without planning permission.
H7	Fuelling overpopulation (climate considerations)	The rationale behind offering 5-bedroom affordable homes should be clarified due to overpopulation and climate mitigation.	The housing mix is informed by the assessment of housing need in Oxford.
H7	Questioning the 10 units threshold	10 units is too small (they support a more flexible policy). Another comment wants it to be lowered to 5 units because most developments in their neighbourhood (Summertown) are less than 10 which they don't want to encourage.	10 units was chosen because that is the definition of major development. A higher threshold for example with a 25-unit threshold, would be more likely to fail to meet identified needs and could lead to an imbalance in housing mix. Alternatively, a lower threshold would be too small to get a mix onsite.
H7	Lack of clarity	Several comments say policy wording could be clearer e.g. it is unclear if a one-bedroom apartment would be a "home" or not.  One person says confusing wording has stopped them from giving input.	Any self-contained residential dwelling is classed as a home.  Noted, further explanation is provided in the supporting text and background papers.
H7	Support for preferred option	Several people support the policy, saying that diversity is needed in developments e.g. to avoid areas where no one with small children can move in which could be detrimental for local schools. Some support with no stated reason.	Noted and appreciated.



Draft policy	Topic	Summary of comments	Response
H7	Alternative options	<p>Several comments support option b, i.e. including a mix for both market and affordable homes, with no stated reason.</p> <p>Many comments support option c, i.e. not specifying a mix for any type of development but requiring 2-3 types of unit size in larger developments. They argue this would allow developers to better respond to market signals.</p> <p>Several comments against any policy relating to housing mix, either with no stated reason, or for reasons such thinking we should not interfere with the housing market as it will disincentivise developers.</p>	<p>Including both market and affordable homes would not allow for a flexible response to the market. 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.</p> <p>Not specifying a mix is more likely to fail to meet identified needs and lead to an imbalance in sizes of new units of both market and affordable housing.</p> <p>The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. For example, one-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.</p>
H7	Only prescribe a mix for affordable homes	Newmark consider the current policy contradicts itself as it starts by only relating to AH, but it later implies a mix would be set for both AH and market homes.	The respondent has misinterpreted the draft policy which does in fact only apply to

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		We consider a unit mix should only be prescribed for the AH.	affordable housing (not market housing). The first part applies to affordable housing (for rent or ownership), and the second part only applies to affordable ownership.
H7	More council housing and housing cooperatives	One person does not support any of the policy options as they argue that there is an overreliance on market housing: there should be more council homes and housing cooperatives instead.	There are other policies in the Local Plan which seek to deliver social rent housing and community-led development (H2 and H13).

### Statutory Consultee Responses – Draft Policy H7

Oxfordshire County Council

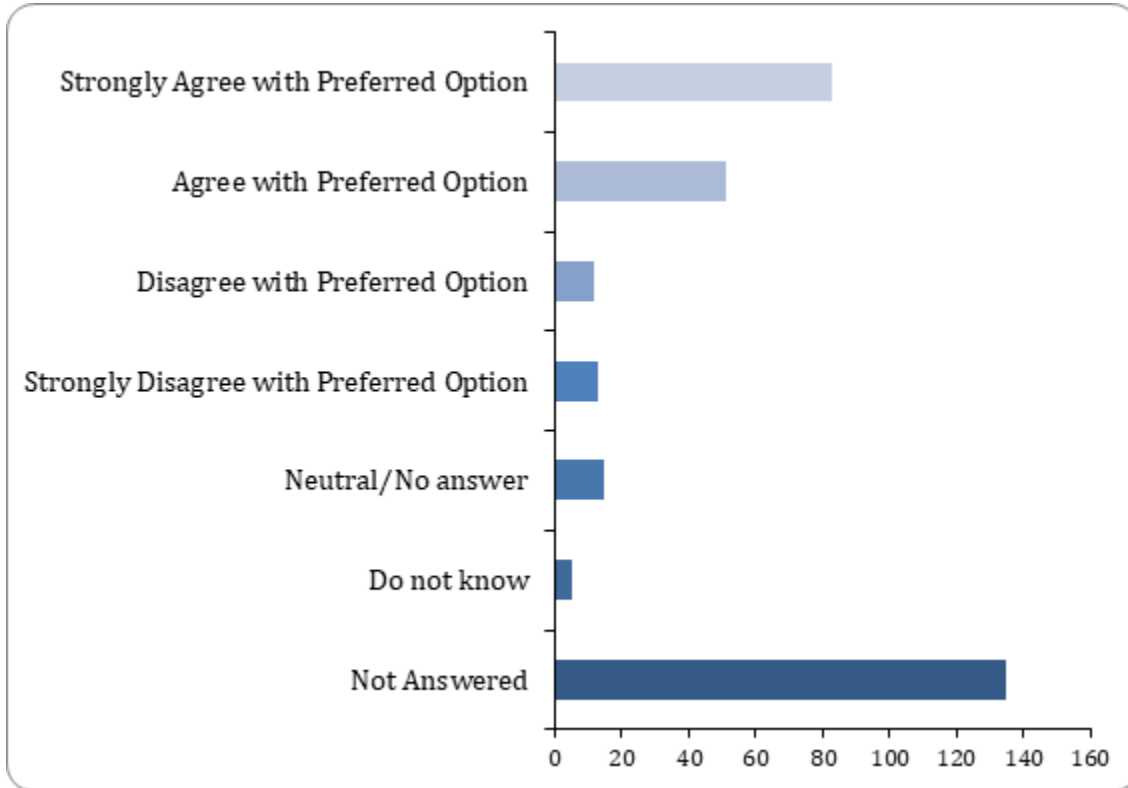
<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy H7 Mix of Dwellings	<b>Strategic Planning</b> This is a matter for the City Council. The City's choice between the options on mix of housing sizes should be based on the evidence and monitoring of current policy.	Noted.	No action required.

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p><b>Housing Services</b></p> <p>This policy sets out the number of bedrooms, but this may not be sufficient to ensure an appropriate mix of dwellings to create mixed and balanced communities. Given that extra care housing developments within Oxford City are unlikely, we consider there is a need for provision within the policy that refers to the possibility of providing affordable specialist supported housing.</p>	<p>This comment is contrary to the above. We are not considering introducing a provision relating to affordable specialist supported housing for this policy.</p>	<p>No action required. May be discussion outside plan-making are needed.</p>

## All Public Responses – Draft Policy H8

Please tell us what you think about policy options set 001c (draft policy H8): Loss of dwellings.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	83	26.43%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	12	3.82%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	15	4.78%
Do not know	5	1.59%
Not Answered	135	42.99%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H8	Short lets	As worded this does not explicitly cover the loss of a permanent home to a short term let or holiday home. This should be clarified in the policy, or put in a separate policy. Policy should also include permanent residency requirements on all new housing granted planning permission and restrict the number of short-term lets.	It's beyond the scope of the plan to restrict lets.
H8	Support	Support this policy and the contribution it will make towards retaining the existing housing stock.	The support is welcomed
H8	Subdivision is positive	Subdivision increases housing options, so this policy makes no sense. Can create flats for young, who need them. The policy should not include the blanket presumption against subdivision of existing family houses. There is an over-whelming need for single person housing and some family accommodation converted to this is beneficial.	The policy does not prevent subdivision at all, as long as the dwellings created meet space and other amenity standards.
H8	Subdivision should be restricted	This is a quick earner for a developer cashing in on short supply of first time housing and just generates problems for families trying to find a bigger place.	The mix of dwellings policy for new developments, as well as the market and practicalities will work together to ensure family units are still available.
H8	Object in principle	There should be no restrictions on the loss of dwellings. Let free market dynamics prevail.	Given the strong need for new housing, allowing loss would not be a good response.
H8	Strength of exceptions	Will these be strong enough? Will they be worked around by powerful vested interests?	The criteria set out only a few exceptions, which are considered sensible exceptions that will not be easily worked around.
H8	Include CLTs	This policy should include the encouragement of community land trusts.	This isn't something prevented by the policy.
H8	No mention of vacant properties	This policy is ineffective as it does not cover abandoned or vacant properties. (or a policy is missing)	Separate workstreams look at this issue, but it is not something that

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			can be addressed by the planning system.

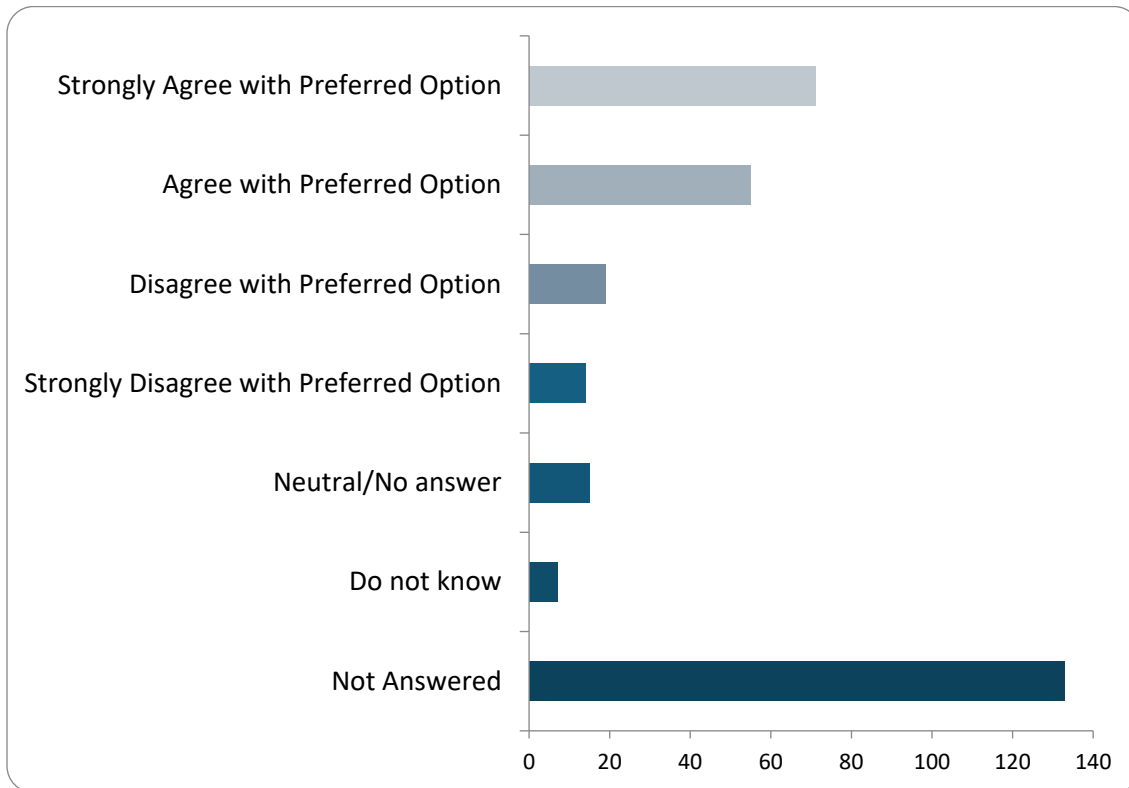
### Statutory Consultee Responses – Draft Policy H8

There were no statutory consultee responses to draft policy H8.

## All Public Responses – Draft Policy H9

Please tell us what you think about policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO).

There were 181 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	71	22.61%
<b>Agree with Preferred Option</b>	55	17.52%
<b>Disagree with Preferred Option</b>	19	6.05%
<b>Strongly Disagree with Preferred Option</b>	14	4.46%
<b>Neutral/No answer</b>	15	4.78%
<b>Do not know</b>	7	2.23%
<b>Not Answered</b>	133	42.36%

Draft policy	Topic	Summary of comments	Response
H9	Request for added flexibility	<p>We consider HMOs offer an affordable solution for some individuals as opposed to renting individually or buying a property. We do however recognise that high concentrations of HMOs can result in changes to the character of the local area and can contribute to amenity issues and parking issues. However, we consider criterion a) (relating to the proportion of HMOs in a 100-metre street length) should not apply to the [Oxford Health NHS Foundation] Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites and its considered that criterion a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites. We therefore request that an exclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.</p>	<p>Comments acknowledged. An addition has been made to Appendix 2.2 (point vi) to make it clear that criterion a does not apply to roads within private non-residential sites.</p>
H9	Objection to policy	<p>We understand the Council's definition 'new purpose-built HMO' means the same thing as 'co-living' accommodation or 'purpose-built shared living' accommodation.</p> <p>We do not agree that prohibiting this type of development is the right approach. The provision of purpose-built co-living allows for existing family homes, which have been poorly converted and are being used as HMOs (whether by students or house-sharing young professionals), to be freed up. Furthermore, the planning system can ensure that newly built co-living accommodation can be controlled and managed properly, which is not always the case with HMOs owned by individual landlords, and often managed poorly.</p>	<p>New purpose-built HMO could potentially have negative impacts leading to additional harm to local amenity, the character of a neighbourhood or additional demand on local services. They could also be put forward with the intention that they will house students and act like student accommodation to circumvent draft policy H8 which seeks to ensure student accommodation is delivered only in the most suitable areas. The preferred option is</p>



Draft policy	Topic	Summary of comments	Response
			therefore to not permit this type of development.
H9	Limit for proportion of HMOs too high	We believe the proposed limit of 20% on the proportion of HMOs among dwellings within 100 metres of a new HMO is too high, and should be reduced to 10%.	Whilst reducing the threshold could lead to a reduction of HMOs in certain areas it is recognised that HMO offer the only available and affordable solution to many. Existing Local Plan Policy H6 includes a 20% threshold, and it is considered appropriate for this to be taken forward in the new local plan.
H9	“Unrelated individuals’ not defined	The phrase “Unrelated individuals” is not explained or defined. Does this mean a family with two unconnected students must now be classified as an HMO? This would be ineffective as it would have a negative effect on student housing provision, discouraging families from renting bedrooms.	<p>An owner occupier can have up to 2 lodgers living in the property, for the purposes of the Housing Act 2004, the property would not be considered an HMO. Owner occupier includes the registered owner and any member of their household.</p> <p>Any subletting in a rented family home where there are 3 or more people from 2 or more households would likely result in an HMO being formed.</p>

Draft policy	Topic	Summary of comments	Response
			<p>In most cases, summer school students who are hosted by a family are unlikely to be deemed as occupying the property as their main or only home, they are essentially guests.</p> <p>Further guidance is provided in Appendix 2.2 of the draft plan which states that buildings NOT counted as HMO include a homeowner together with up to two lodgers.</p>
H9	General comment	How is "area" to be defined? is radius the distance from an existing HMO?	Appendix 2.2 illustrates how the policy will be applied.
H9	Support for alternate options	<p>A number of people said they preferred alternative options. Comments include:</p> <ul style="list-style-type: none"> <li>• why is the threshold currently 20%? What are the considerations?</li> <li>• Oxford HMOs are already restrictive, we should not restrict them further.</li> <li>• HMOs fill an important gap in Oxford’s rental market, offering lower entry rents when studio flats are beyond reach. The policy as drafted would cap HMOs at 20% of properties within 100m and rule out any new purpose-built schemes. Such tight micro-thresholds dampen supply, push sharing households into adjoining districts and risk an unlicensed “shadow” HMO</li> </ul>	The reasons for choosing the preferred option are set out in BGP 003: Specialist housing. The 20% threshold is in the existing adopted policy and is effective.

Draft policy	Topic	Summary of comments	Response
		<p>market—outcomes that neither improve neighbourhood character nor housing affordability.</p> <ul style="list-style-type: none"> <li>•</li> </ul>	
H9	General comment	Will anything be done where HMO are already over the 20%?	How the policy will be applied is set out in Appendix 2.2.
H9	General comment	Call a halt to planning permission being given in advance or retrospectively for HMOs. There are too many, and the residential character of areas with them - eg the Lye Valley estate - is being undermined.	Applications are determined in accordance with existing Local Plan policy H6.
H9	General comment	There should be no increase in the current percentage limit on HMOs as this is important in limiting the creation of new HMOs in areas that already exceed the limit. Consideration should also be given to reducing the proportion of HMOs in areas where limits are already exceeded and tackling associated legacy issues such as parking pressures. Conversion to short term lets, which aggravates local housing shortages, should be prevented.	There is currently no planning law to allow councils to restrict numbers and location of short term lets.
H9	General comment	There should be a better register of HMO (for some fly very much under the radar), and if planning permission was given for two family dwellings which turned out to be built as HMOs (or used as AirBandB rental) these should be retrospectively have their permission withdrawn.	Oxford City Council is required under the Housing Act 2004 to maintain a register of current HMO licences, temporary exemptions from HMO licensing and interim management orders. The Regulations only permit publication of licences that are in force and so prohibit publication of pending or expired licences.

Draft policy	Topic	Summary of comments	Response
H9	General Comment	<p>HMOs can blight an area as there may be poor management leading to nuisance of all type for the neighbours. They also cause a loss of community cohesion when a family home becomes an HMO. This is one reason why the concentration of HMOs should be resisted. HMOs run by colleges and universities should be included in the policy. Although they may (but are not always) be better managed than commercial HMOs their effect on the local community will be equally damaging.</p>	<p>The policy seeks to strike a balance, it does not include HMO run by universities and colleges as policy H8 seeks to ensure that student accommodation is delivered only in the most suitable areas.</p>
H9	General comment	<p>I have spent half my life in Oxford in HMOs, it's an essential to the city and allowing early careers people to move here. Me feeling is the quantity and quality is controlled by supply and demand.</p>	<p>Noted.</p>
H9	Lack of clarity	<p>Consideration should be given to the increase in very large HMOs or clustering of several HMOs in a single building. It is not clear that the preferred option would deal with additional problems which they cause and the policy needs adjusting to ensure that it will do so.</p>	<p>The policy includes a requirement for applications for HMO to comply with good practice guidance on HMO amenities and facilities. Further adjustments are not considered necessary.</p>
H9	General comment	<p>You need a mixture of owner-occupied, private rental and HMO rental in an area or it'll just look shabby and feel dangerous. Take Ridgefield Road and Cricket Road, for example - the houses on these roads should be as desirable as any other 30s-built houses in Cowley but I wouldn't walk down either of these roads after dark (put it that way).</p> <p>Any harsh restrictions on HMOs just lead to unauthorised HMOs and bad conditions/poverty/crime etc.</p>	<p>The policy seeks to strike a balance between restricting the location of HMOs and allowing them to be part of a mixed and balanced community.</p>

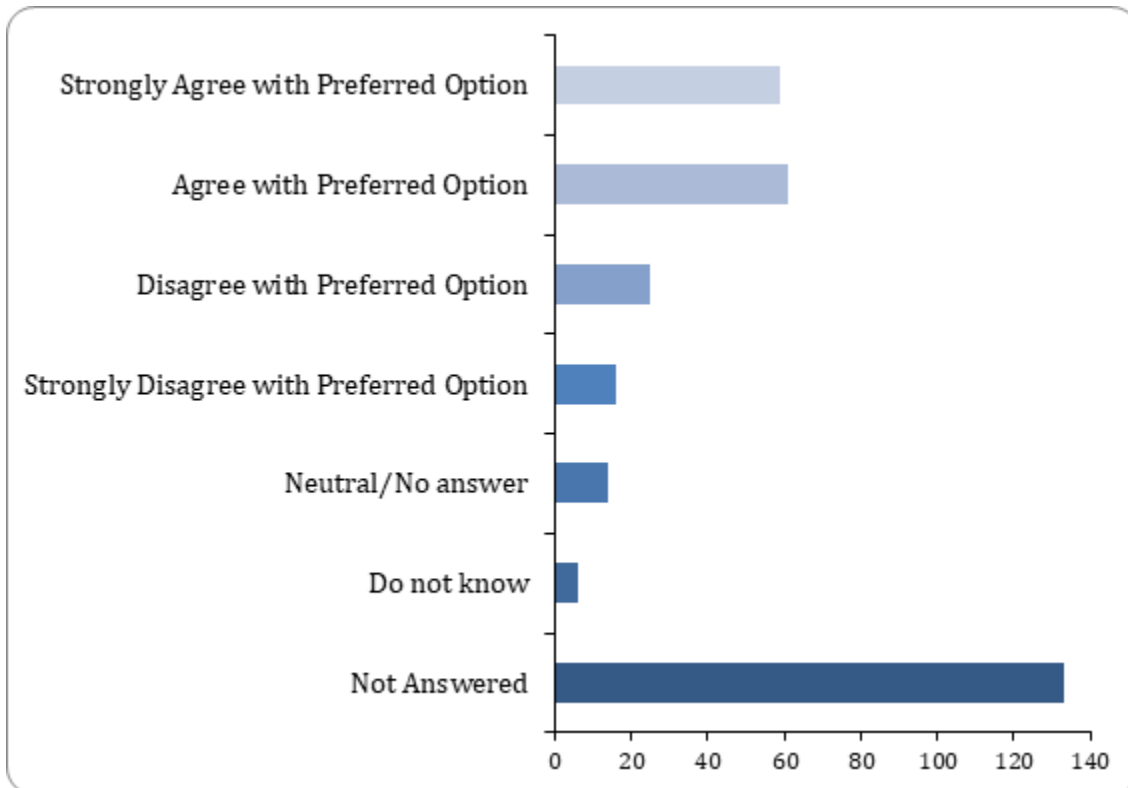
## Statutory Consultee Responses – Draft Policy H9

There were no statutory responses to draft policy H9.

## All Public Responses – Draft Policy H10

Please tell us what you think about policy options set 003b (draft policy H10): Location of new student accommodation.

There were 181 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	25	7.96%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	14	4.46%
Do not know	6	1.91%
Not Answered	133	42.36%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H10	Clarification of policy clauses	Confirm how clause a) is operated / monitored over time, and further guidance required for clause b), regarding the expected indoor amenity space ratio to bedspaces.	Criterion a) is likely to be secured through planning condition. There are no set size or other requirements for indoor amenity space, the requirement is simply that there is some.
H10	Support policy flexibility outside term time	Support the continued allowance of other occupants outside of term times, where a management plan is in place. This supports not only the local economy but the College, through the use of space for conferences and/ or additional tourist accommodation. It would be helpful if the policy elaborated on the types of other occupants, for example, by saying it can be visitors paying per night and who might not be in education. This should not constitute a material change of use given the use would be restricted to students in full time education during term time, which is most of the time.	Support welcomed.
H10	Locational aspect – general support	Support but suggest that wording be adjusted to confirm that if the criteria are unable to be met, then there is a requirement to demonstrate that there are no reasonable alternatives available.	The policy sets out what are considered to be suitable locations, of which there are sufficient to meet the requirements of what is Policy H10 in the Draft Submission Oxford Local Plan.
H10	Additional restrictions to arterial roads	Policy should be amended to include an additional restriction to principal/arterial roads. This is to exclude student accommodation on side roads leading from district centres so as to prevent further issues	Restricting even further to arterial roads only within the centres is considered to be too restrictive

Draft policy	Topic	Summary of comments	Response
		of student noise etc. Support very strong restrictions on parking associated with student accommodation.	and could rule out too many sites that are suitable.
H10	Locational aspect is too restrictive - list of suitable locations should be expanded	<p>Suitable locations should also include along arterial routes and those sites within a 15-minute walking distance of a campus/college. It is considered that the arterial routes in/out of Oxford present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment. There are other policies in the Plan which address concerns relating to unacceptable changes in character to residential streets and ensuring that new development does not lead to adverse amenity impacts.</p> <p>The appropriateness of the location should be judged on a case-by-case basis. There might be a location that is outside of a centre / existing campus, and which has good public transport links to a university, and which has characteristics that make it unsuitable for conventional residential housing.</p> <p>The policy would be restrictive to both universities and the delivery of student accommodation by third party providers, given its interaction with Policy H11. Without the allocation of new sites, there needs to be greater flexibility on windfall locations to help both Universities meet the requirements of the threshold in Policy H11.</p>	Sites within a 15-minute walking distance of a campus may well be wholly unsuitable sites.
H10	Objection – should include all universities and	The Policy is dependent on the identity of the applicant, which favours existing institutions and is an attempt to limit competition. There are not two but three universities in Oxford, as University of	The policy is not dependent on the identity of the applicant.



Draft policy	Topic	Summary of comments	Response
	boarding/ language schools	West London owns Ruskin Campus. The policy should also apply to boarding/ language schools and other institutions which don't have a campus.	
H10	Increase provision of purpose-built student accommodation	<p>Recognise that provision of student accommodation can impact upon the availability of private market dwellings due to potential occupancy by students. Increased provision of student accommodation can therefore release these dwellings back into the marketplace.</p> <p>Provision of purpose-built-student accommodation positively impacts on the wider housing availability in the City by providing more accommodation at a higher density, thereby releasing housing stock back to the community.</p>	Provision of student accommodation can free up market housing, but it can also compete for sites with market housing that delivers on-site affordable housing. The policy approach is about managing the impacts of student accommodation by ensuring it is in suitable locations.
H10	Amount of new student accommodation required should be justified	Student accommodation is already extensively used by non-students, including UNITE students accommodation, but especially in Oxford University Colleges where the university term lasts for less than half the year. Rooms are let out even in term time on a bed and breakfast basis and before they are allowed any more student accommodation, colleges should be required to demonstrate the use of their existing rooms and why they are not all used for students. Due to colleges' charitable status, the colleges renting out their facilities provides unfair competition to anyone trying to run a hotel or B and B in Oxford.	The policy does restrict occupation to those on longer courses. It does also allow use of the accommodation outside of term-time, which makes efficient use of the site and can help meet the needs of other types of students such as language students visiting Oxford outside of term times.
H10	Support	Support preferred option.	The support is welcomed.

Draft policy	Topic	Summary of comments	Response
H10	Support Alternative Option 3	New student accommodation should only be built on existing campus or student accommodation sites. Developing sites in other locations has led to a continued loss of family homes and areas which could have been developed for private residential use to meet the housing need have been replaced with development by educational establishments.	The Local Plan is required to understand and attempt to meet all types of housing need. There are sufficient sites in the outlined locations, but further restriction would not be justified.
H10	General comment	There should be restrictions on students generally bringing cars to Oxford in this policy, not just to only campus and accommodation sites. Student parking is already a problem in private HMOs.	Policies are restricted to what can reasonably be achieved through the planning system.
H10	General comment	This policy should expressly reference the need for student accommodation, and it should expressly support new accommodation that meets this need, not restrict it. Additionally, management restrictions should not be placed on new student accommodation.	The Local Plan is required to understand and attempt to meet all types of housing need, including for students. 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.

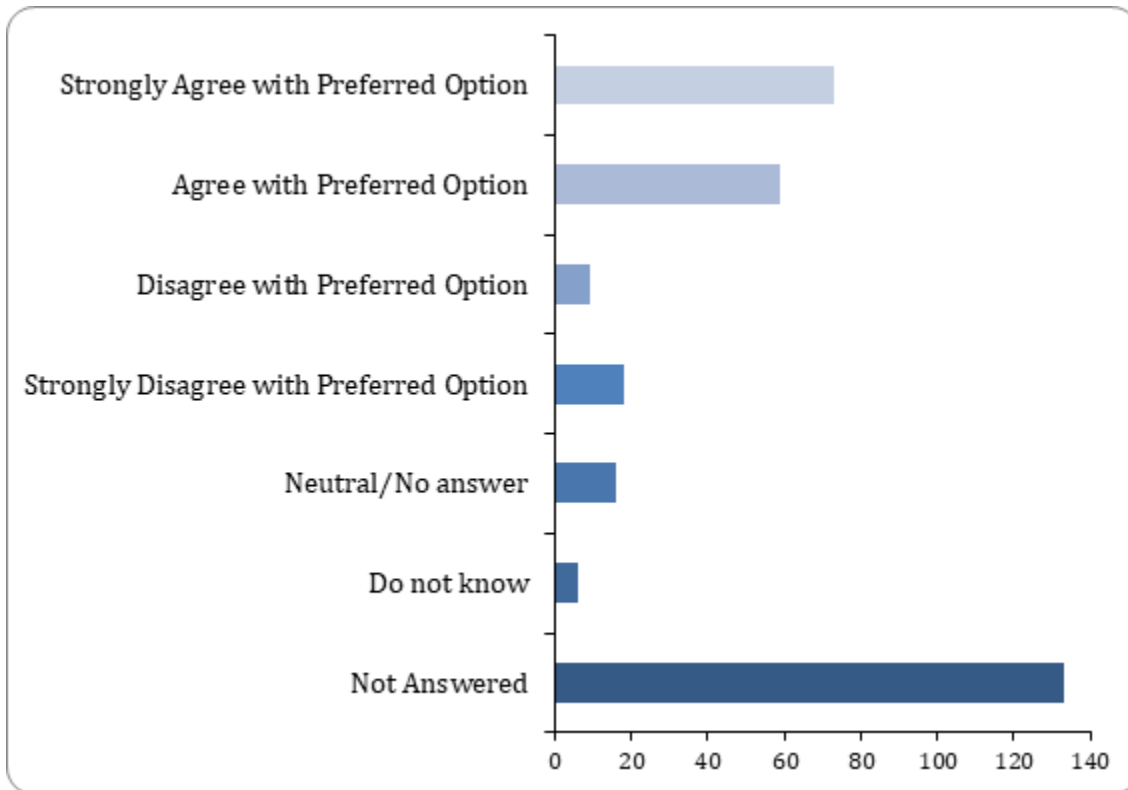
## Statutory Consultee Responses – Draft Policy H10

There were not statutory responses to draft policy H10.

## All Public Responses – Draft Policy H11

Please tell us what you think about policy options set 003c (draft policy H11):Ensuring there is enough student accommodation to meet needs.

There were 181 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	73	23.25%
<b>Agree with Preferred Option</b>	59	18.79%
<b>Disagree with Preferred Option</b>	9	2.87%
<b>Strongly Disagree with Preferred Option</b>	18	5.73%
<b>Neutral/No answer</b>	16	5.10%
<b>Do not know</b>	6	1.91%
<b>Not Answered</b>	133	42.36%

Draft policy	Topic	Summary of comments	Response
H11	Objection – don't link new academic floorspace with need for additional student accommodation	<p>Too restrictive and will not allow leading institutions like the University of Oxford to expand and grow as it needs to, especially at a time when the UK is in desperate need for economic growth and innovation. Growth should be enabled, not held hostage, if the city wants both affordable housing and a thriving research ecosystem.</p> <p>Do not cap the number of students who live in the private market, they should be able to choose where they wish to live.</p>	The thresholds are set above current levels and within what is achievable by the end of the threshold period, even with the forecast growth in student numbers requiring accommodation. It is a way of managing the potential negative impacts of student accommodation, without being overly restrictive.
H11	Objection – thresholds set too low	The data in the most recent Specialist Housing Needs Evidence by Icenl indicates that Policy H11 does not seek to support new accommodation to meet the universities' need. This is because it restricts any development that would expand University of Oxford and Oxford Brookes by more than 2,500 and 5,750 students respectively, however, these caps are around the same numbers as the new student accommodation beds needed. Therefore, the need will be present with or without the expansion restriction as proposed. The policy should be supporting development to meet this need, rather than restricting universities from expanding beyond the bed need.	The policy only applies to certain students - those in the defined list of students requiring accommodation. It is carefully calculated to be achievable, based on the expected growth in numbers of students requiring accommodation, and forecast increases in student rooms.
H11	General comment	Policy H11 makes development of new and improved university facilities reliant upon development of additional student accommodation. Consequently, policies which influence the development of student accommodation are integral to the achievability of the Local Plan's objectives. Policies which prevent the	The requirement for contributions to affordable housing from student accommodation is considered justified, and has been viability tested. It is not

Draft policy	Topic	Summary of comments	Response
		delivery of student accommodation, particularly on strategic sites, would undermine the delivery of the Local Plan as a whole and render it unsound. This is considered particularly relevant on the issue of affordable housing contributions from student accommodation discussed under policy H3.	considered to hinder development of additional student accommodation.
H11	University of Oxford Colleges should each be considered separately	Although Worcester College is a constituent college of the University of Oxford, it is a separate legal entity to the University. On this basis, it would not be reasonable for the College to have facility restrictions placed upon them whilst they cannot fully control other institutions. The College would seek additional wording such as; “Unless demonstrated that facilities associated with constituent colleges will have no impact on existing accommodation requirements for the relevant college”.	This approach has applied to the university as a whole for decades and the University is able to supply necessary monitoring each year across the colleges. The needs as a whole, and the expected growth in student numbers of the university, have been considered when setting the policy.
H11	Clarity over review period	Agreeable to the proposed thresholds for the maximum number of students living in non-university owned accommodation. However, there is ambiguity of what the required information or process would be after 2033, or the terms of this review. This does not enable the Universities to undertake strategic planning with any certainty and would be grateful for further discussions on this element of the Policy.	Text has been added to clarify this.
H11	General support for policy	Several Colleges and others generally support the objective of Draft Policy H11.	Support noted.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H11	Support Alternative Option 1	Favour a free market approach - the private rental market will invest in student accommodation if the demand is there. Have students in private rental accommodation city wide to avoid overconcentration in certain neighbourhoods.	A free market approach could not at the same time ensure students were spread across the city.
H11	General comment	<p>'Students' must include both undergraduates and graduates. Increase in numbers of postgraduate students must be closely monitored as the numbers continue to increase as fast as the Universities build new accommodation.</p> <p>Also set long term targets to ensure year on year reductions in student numbers living in non-student dedicated accommodation. The intention is to reclaim housing for council housing or for keyworker part rent/part buy.</p>	The definition in the plan of students requiring accommodation does not exclude all postgraduates.

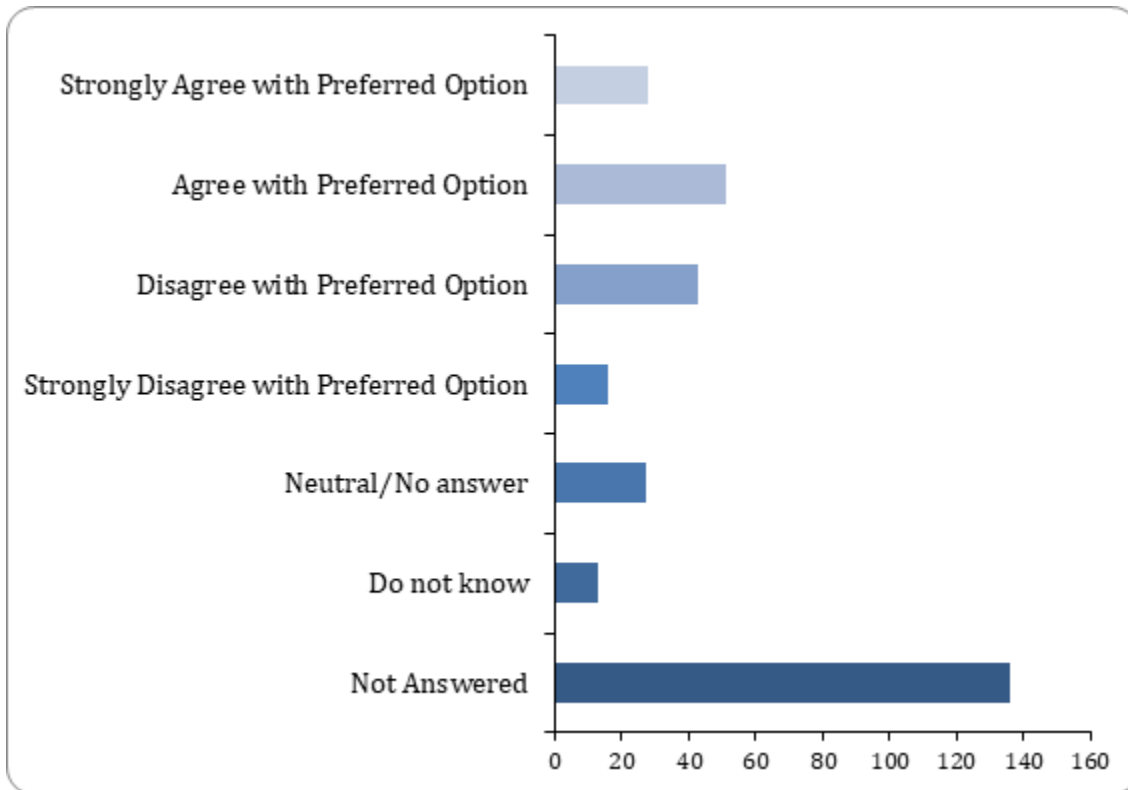
### Statutory Consultee Responses – Draft Policy H11

There were no statutory responses to draft policy H11.

## All Public Responses Draft Policy H12

Please tell us what you think about policy options set 003d (draft policy H12): Homes for Travelling Communities.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	28	8.92%
Agree with Preferred Option	51	16.24%
Disagree with Preferred Option	43	13.69%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	27	8.60%
Do not know	13	4.14%
Not Answered	136	43.31%



Draft policy	Topic	Summary of comments	Response
H12	Preferred Option	Who would determine the criteria referred to in the preferred option? They may be impossible to meet.	The criteria in the preferred option have been informed by the latest Gypsy and Traveller Assessment (2024), as well as ensuring that the context is relative to Oxford's constrained area.
H12	Support Alternative Option 1	<p>Sites should be allocated to meet the identified need - travelling communities have as much right as anyone else to live in Oxford. Also provides clarity to all about where the sites will be located.</p> <p>If the expected assessment of need for this type of site demonstrates that a site in Oxford is needed, we would encourage the council to find space for this within the city's boundaries.</p> <p>It is better to have a well-managed facility which can be cleaned and have the necessary provisions such as water, power, lighting and refuse collection, rather than to react on a case-by-case basis.</p>	<p>The latest evidence indicates that Oxford City does not have a need, therefore there is no justification to allocate sites.</p> <p>Should any proposals be submitted, the criteria as set out in the draft policy would ensure that these provisions would need to be met on site.</p>
H12	Support Alternative Option 2	<p>Default to national policy</p> <p>Traveller communities are a big nuisance in terms of causing anti-social behaviour and environmental problems for the surrounding communities. They should not be encouraged or allocated sites.</p>	<p>There would not be any policy to help in the assessment of the impact, should a site come forward if only national policy was relied on.</p> <p>The December 2024 update to the Planning policy for traveller sites made clear that the Government's</p>

Draft policy	Topic	Summary of comments	Response
			overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community.
H12	Designate stopping sites	<p>Through freedom of information requests, Friends, Families and Travellers found in 2024 that there is a lack of transit site provision across the UK, despite repeated recommendations from national and international bodies. The Council should search for sites that can deliver temporary stopping places for Travellers. Oxfordshire County Council's 2024 needs assessment highlighted that there are currently no transit pitches available in Oxford City, yet across Oxfordshire there were 22 reported encampments between May 2022 to October 2023.</p> <p>Even if sites are not designated, the council should identify areas that could potentially be used by travellers "on hand" so that they may be efficiently allocated space rather than being caught up in an endless waiting process.</p>	Noted. The latest Gypsy and Traveller Assessment recognises that all Oxfordshire authorities should work together to address the lack of stopping sites in the County.
H12	General comment	Any proposals for traveller sites should be carefully scrutinised to ensure they do not negatively impact local neighbourhoods.	The draft policy makes it clear that all criteria in the policy would have to be met for a proposal to be acceptable.
H12	General comment	This will only work if engaging with the travelling community.	The travelling community have been involved and were a key part of informing the data in the latest

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			Gypsy and Traveller Assessment (2024).

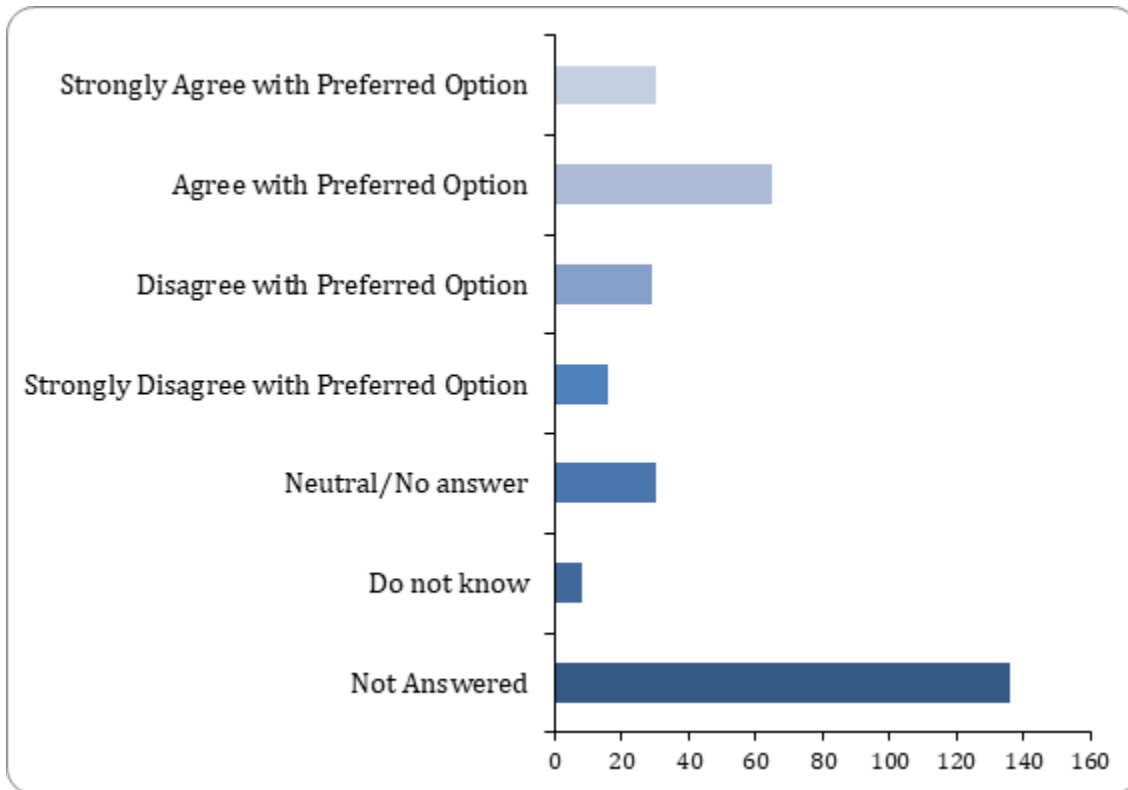
### Statutory Consultee Responses – Draft Policy H12

There were no statutory consultee responses to draft policy H12.

## All Public Responses – Draft Policy H13

Please tell us what you think about policy options set 003e (draft policy H13): Homes for Boat Dwellers.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	30	9.55%
Agree with Preferred Option	65	20.70%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	30	9.55%
Do not know	8	2.55%
Not Answered	136	43.31%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H13	Support Alternative Option 1	Search for sites to allocate new moorings. The 2024 assessment concedes that despite a need being identified in Oxford, there is limited potential. Allocating even a small, well-screened strip – perhaps by repurposing disused wharfage or incorporating moorings into a wider regeneration scheme—would give boat dwellers a legitimate, serviced option and ease pressure on land-based housing. This is a more pro-active approach where moorings can be prepared with sanitation, water and power facilities, and be considerate of other waterway traffic and users. Reacting case by case is inefficient.	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.
H13	Support Alternative Option 2	Do not allocate sites or set out policy criteria	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.
H13	Provides a more affordable way of living	Boat dwellings are one of the few remaining unique and affordable ways for people from a diversity of socio-economic backgrounds to live and work in Oxford - it's essential that mooring spaces be increased gradually over time in line with other increases in dwelling spaces.	They can provide a more affordable way of living, although this isn't always the case due to cost of boat maintenance etc.
H13	Object to all proposed options	Disagree with all options. A new policy shared with neighbouring local authorities should be created which allocate sites for new permanent moorings based upon a realistic, independent assessment of demand.	This will not necessarily result in delivery of sites if there is no landowner interest.
H13	General comment	There seems to be no oversight and management of these boat sites. Many boats are either half-sunk or in disrepair and are an eye-sore. Need stricter controls and monitoring over exterior areas to manage this.	Noted. In Oxford, the control of residential moorings falls under the Environment Agency for the

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
			River Thames and the Canal and River Trust for the Oxford Canal.
H13	General comment	Hopefully you are engaging with relevant local communities to find out if they are happy with this.	The boat dwellers community have been involved and were a key part of informing the data in the latest Boat Dwellers Assessment (2024).

### Statutory Consultee Responses – Draft Policy H13

South Oxfordshire District Council and Vale of White Horse District Council

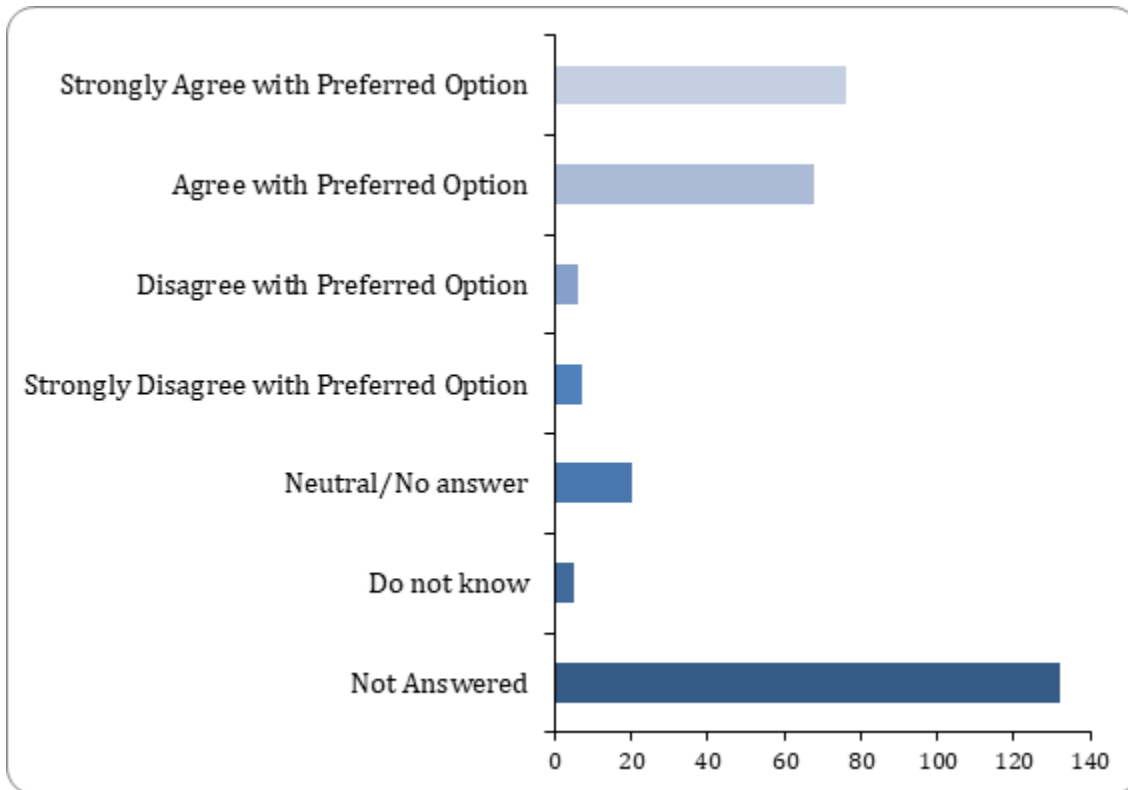
<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy H13 Homes for boat dwellers	References to need in Oxford and Oxfordshire aren't precisely aligned to the joint evidence in the GTAA at para. 9.30, and this should reflect the evidence.	Paragraph 2.49 of the Reg 18 document does reference the need expressed in paragraph 9.30 of the joint Oxfordshire Boat Dwellers Assessment. The associated Background Paper for Specialist Housing already explains the justification for using a criteria-based policy approach.	No action required.



## All Public Responses – Draft Policy H14

Please tell us what you think about policy options set 003f (draft policy H14): Older Persons and Other Specialist Accommodation.

There were 182 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	76	24.20%
<b>Agree with Preferred Option</b>	68	21.66%
<b>Disagree with Preferred Option</b>	6	1.91%
<b>Strongly Disagree with Preferred Option</b>	7	2.23%
<b>Neutral/No answer</b>	20	6.37%
<b>Do not know</b>	5	1.59%
<b>Not Answered</b>	132	42.04%



Draft policy	Topic	Summary of comments	Response
H14	Support	Support for preferred option	Support welcomed.
H14	Policy should go further	<p>The housing needs data referenced within the supporting text has been superseded by the June 2025 study which demonstrates a significantly larger requirement for older persons housing of all types. The policy should recognise the benefits to the wider housing stock (releasing underoccupied homes) as well as the many savings and health benefits associated with the provision of such housing. As drafted, the policy is negative ("will only be granted where..."). We recommend that this draft policy is rewritten and suggest the following by way of example.</p> <p><i>Proposals for specialist and supported housing will be strongly supported where applicants provide evidence of appropriate existing transport and other services within the vicinity of the proposal site. Over the plan period, targets will reflect the latest evidence of housing need (at the time of writing being the June 2025 Housing Needs evidence base).</i></p>	The Specialist Housing Needs Assessment has been updated in November 2025. The policy wording is consistent with other policies in the plan.
H14	Sufficient exterior space	There must be enough green space, easy access for visitors, parking spaces, etc.	Agreed- the intention is that the criteria ensure this.
H14	No policy	There should be no policy interfering in this or relating to elderly persons or supported accommodation in any way.	It is considered important to ensure a good quality living environment for everyone.
H14	Ensure no 'ghetto'	It is important there are no areas with homogenous demographics- it must be mixed. Preferred option fine as long as that's avoided.	In Oxford any delivery of this kind of housing will be limited in size and part of a mixed-use area because of the nature of development opportunities.
H14	Does not need to be in the city/no requirement in	There may be more space and less pressure on local infrastructure outside the city. Many elderly people do not work and this may help reduce housing costs in the city for working residents. There is not an	The policy approach is to ensure what does come forward is suitable, but not to make it a

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
	city/prefer option 4	over-whelming housing need for older persons accommodation. There are, however, hundreds of single homeless people in desperate need. Therefore, the priority is elsewhere.	requirement that would then be competing with other needs.
H14	Quality of care homes	What can be done to encourage better access to affordable, publicly-owned or communal-ownership structures for care homes that have a high quality of care?	Many solutions will be outside the planning system.
H14	Balance requirements against delivery	This type of accommodation can help free up family homes, so it's important it's not restrictive, but it's also important that it is good quality.	Agreed, and the criteria will attempt to strike the right balance.
H14	Prefer option 2	Prefer option 2 or wonder if it cannot be incorporated into option 1 as it sounds like a good idea to ensure a mix of housing and types of residents.	Option 2 is not mutually exclusive to the preferred option, but it is not favoured for the reasons set out in Background Paper 003

## Statutory Consultee Responses – Draft Policy H14

Oxfordshire County Council

<b>Draft Policy/Evidence base/topic</b>	<b>Summary of comment</b>	<b>Response</b>	<b>Outcome</b>
Policy H14 Older Persons and other	<b>Strategic Planning and Housing teams</b> The County Council's evidence of need for affordable extra care housing is set out in the existing market position statement supplement. As the County Council's interest is predominantly in respect of affordable	The County's specialist and supported housing needs assessment sets out that c.145 affordable extra care housing units	ACTION: Potential meeting/ discussion with Strategic

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
specialist housing	<p>housing, rather than market provision of housing for older people, our comments on this issue are covered earlier in this response in respect of Policies H2, H4 and H7.</p> <p>However, we support the part of this policy which indicates that planning permission will not be granted for the loss of existing specialist care accommodation unless replaced or there is evidence of no need for the facility.</p> <p><b>Public Health</b></p> <p>This policy is supported, and we would like to see additional wording which elaborates on the term ‘gardens’ in the draft wording, with emphasis on dementia-friendly design.</p> <p>Studies have shown that the design of outdoor spaces (such as the choice of sensory planting and wayfinding) and indoor spaces (level accesses) can significantly</p>	<p>are required by 2044. The City’s specialist housing needs assessment (published to support the Reg.18 consultation) shows a similar amount of need for the plan-period.</p> <p>Noted.</p> <p>We will consider whether we can incorporate the phrase ‘dementia-friendly design’ as relating to gardens.</p> <p>Noted.</p>	<p>Planning and Housing Teams</p> <p>No action required.</p> <p>Oxford City Action: Consider incorporating some text around ‘dementia-friendly garden design’</p>

Draft Policy/Evidence base/topic	Summary of comment	Response	Outcome
	<p>improve the quality of life of those living with dementia and enable them to stay living in their homes for longer:</p> <p><a href="https://www.kirklees.gov.uk/beta/health-and-well-being/pdf/kirklees-dementia-design-guide.pdf">https://www.kirklees.gov.uk/beta/health-and-well-being/pdf/kirklees-dementia-design-guide.pdf</a></p>		

BOB ICB

Draft Policy	Summary	Response	Outcome
Policy H14 Older Persons and Supported accommodation	<p>The ICB published its Primary Care Strategy in 2024, and it sets out that the population of BOB will increase over the next 10 years in particular the older population who make the greatest use of healthcare services.</p> <p>GP appointments would need to increase by 55% and this would represent an unsustainable level of growth in terms of available funding and workforce if there is no change to the existing care model.</p>	<p>Noted.</p> <p>Noted.</p>	No further action

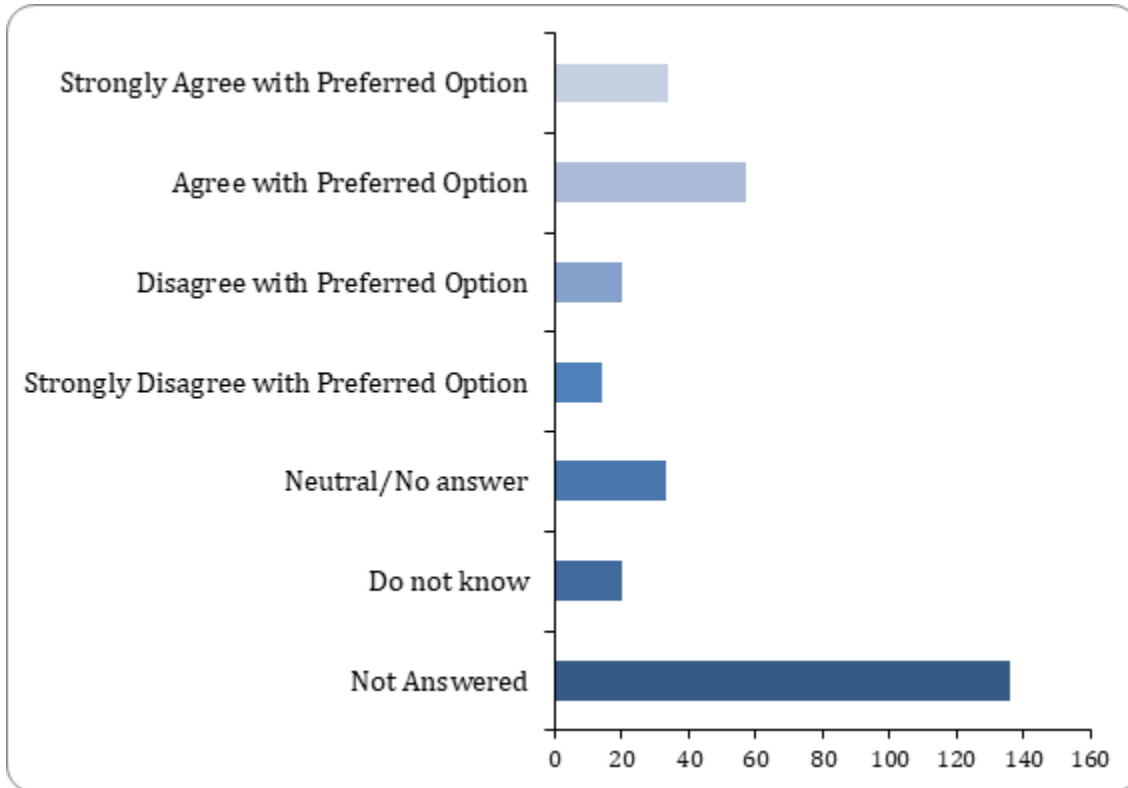
Draft Policy	Summary	Response	Outcome
	<p>Considering the scale of this type of development in the City will be limited, the ICB considers that robust evidence should be requested to identify appropriate primary care mitigation measures to accommodate this extra demand.</p> <p>The ICB notes that the Council has published a technical advisory note related to Health Impact Assessment (HIA). The ICB considers that the submission of a HIA would be appropriate evidence to demonstrate the provision for older persons and other specialist accommodation would not exacerbate the capacity of the nearby existing primary healthcare provisions. The ICB should also be consulted in this type of planning application.</p>	<p>Appropriate primary care infrastructure required to mitigate the level of development proposed in the Local Plan should be identified and projects/ schemes set out in the IDP. It is not the role of the City Council to identify healthcare infrastructure, nor is it the role of developers.</p> <p>Noted.</p>	

Draft Policy	Summary	Response	Outcome
	<p>BOB ICB propose the following amendment to Policy H14:</p> <p>Planning permission for accommodation for older people and supported and specialist care will only be granted where it:</p> <p>a) Is located with good access to local facilities and services including public transport, shops, and healthcare facilities; and</p> <p><u>b) Includes the submission of a Health Impact Assessment (HIA) is to provide an assessment of the impacts of the proposals in healthcare provision and any mitigation measures are identified in the scheme; and</u></p> <p>b) <u>c)</u> Is located close to or as part of a mixed community and will contribute positively to the creation and/or maintenance of mixed and balanced communities; and</p> <p>c) <u>d)</u> Is appropriate for the neighbourhood in terms of form, scale, and design...</p>	<p>The Plan already contains a policy (HD10) which sets out when an HIA would be required. As the threshold is for “major development” (i.e., 10 or more homes or 1,000sqm or more of employment floorspace), this would mean that development proposals for accommodation for older people would already produce an HIA for such proposals.</p> <p>Inclusion of a requirement in this policy is therefore not required as it is already covered in the HIA policy.</p>	

## All Public Responses – Draft Policy H15

Please tell us what you think about policy options set 003g (draft policy H15): Self-build and custom house building.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	34	10.83%
Agree with Preferred Option	57	18.15%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	33	10.51%
Do not know	20	6.37%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
H15		ONV notes that policy H14 is not effective when applied to higher density housing schemes that the plan is aiming for to make efficient use of land. In particular, schemes that include apartments or flats. In such developments it is not practical to have self-build properties. It may be possible to allow people to fit out an apartment, but this could be difficult in terms of noise and disturbance for adjacent occupiers and location of services etc. A suitable caveat should be added to the list in the policy as currently it only excludes flatted development on brownfield land. The concerns noted above would arise on brownfield or greenfield sites.	On greenfield sites there is far more option to deliver a variety of housing types.
H15	Policy should be more ambitious	Community-led housing is supported via DRAFT POLICY H15: SELF-BUILD & CUSTOM HOUSEBUILDING. However, this policy offers much less CLH ambition than in the emerging South and Vale, Cherwell and West Oxfordshire Local Plans. These have drafted more detailed policies in support of community-led housing, in line with the requirements of the new NPPF. The Oxford Plan could very usefully and straightforwardly include a policy for community led housing such as that included in the South Oxfordshire District Council and Vale of White Horse and Vale of White Horse joint submitted Local Plan ( <i>JLP policy copied in text</i> ). Such a policy would also recognise and much better reflect the pioneering role that the City Council has historically taken (and continues to do so) with regard to the promotion and advocacy of community-led housing.	The needs in Oxford are very different to those in the more rural areas surrounding it. The NPPF says that planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing. The local plan policy is generally supportive, but it is not considered it needs to go further. In Oxford, mall sites are the norm, and all that is available to meet most needs.
H15	Feasibility	On complex and constrained brownfield sites such as Templars Square, where comprehensive, higher density mixed use development is required and design and active frontages are a key element of the	The policy acknowledges that there are sites where the policy may not be appropriate, such as



Draft policy	Topic	Summary of comments	Response
		masterplan, this policy creates challenges in terms of feasibility, construction programme/phasing/management, and limits the ability to optimise the housing delivery on-site. We therefore request that the policy includes wording to prioritise comprehensive development and site optimisation, over rigid application of the 5%. We also request that it is acknowledged that this percentage target may be challenging to achieve on constrained and complex urban sites and is not required to be met at the Templars Square site.	brownfield sites with flatted developments.
H15	Site threshold	challenge the increased threshold for the provision of land for self-build from 5% on sites of 50 units or more to 100 units or more, making it more difficult for community-led housing groups to acquire land for self-build affordable housing projects.	The threshold is set for self-build at a level sufficient to meet forecast needs over the Plan period, whilst also ensuring a large enough group of plots come forward to be feasible to deliver.
H15	Support for preferred option	We seek assurance that such self-build and custom housing is bound by the same policies as other development and specific mention that Policy G1 and G4 apply.	Developments which come forward under H15 would also be subject to the other relevant policies in the plan, the same as any other development proposal.
H15	Support for option 2	Support of more freedom and pushing the policy	Support is welcomed.
H15	Support the policy but encourage more environmental initiatives	Provide incentives for ecological net-positives of the buildings to look at environmental and social benefits	Environmental and social measures to be delivered through any development would be addressed through other policies in the plan.
H15	Support to try and help affordability issues	A few comments all agreeing this is a good policy and should be pushed forward by the council to address affordability and pushing social cohesion	Support is welcomed.

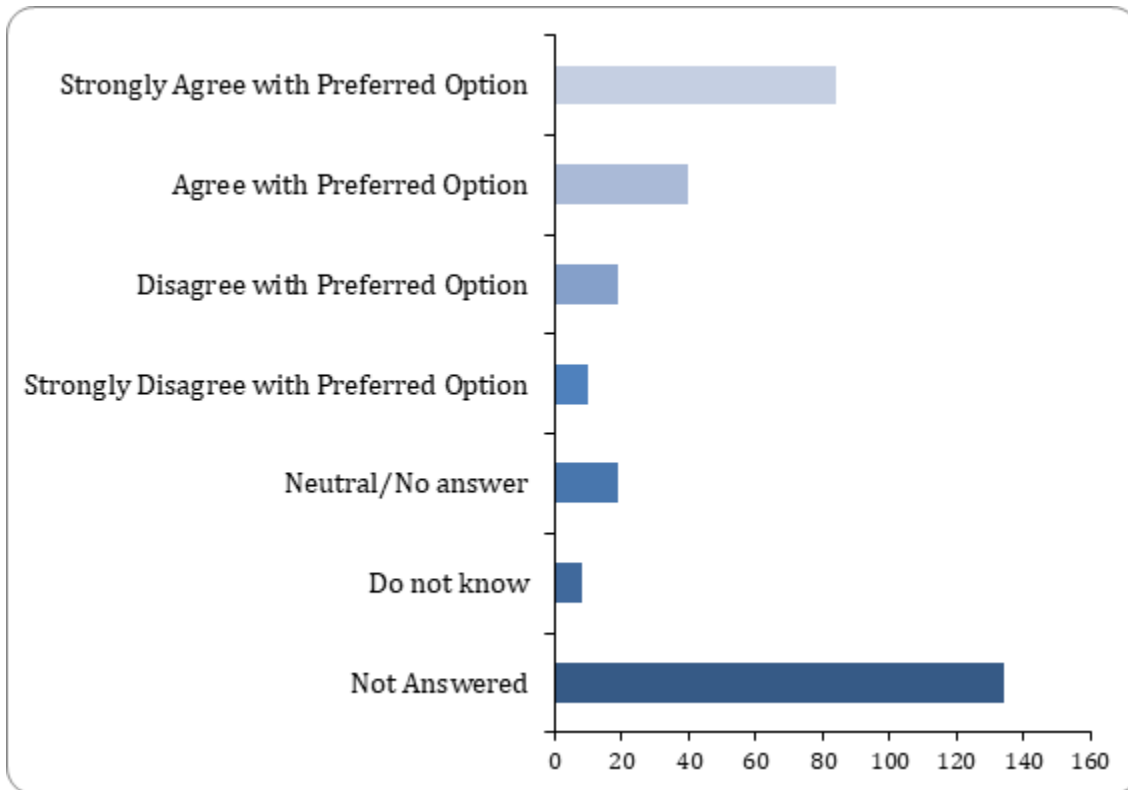
## Statutory Consultee Responses – Draft Policy H15

There were no statutory consultee responses to draft policy H15.

## All Public Responses – Draft Policy H16

Please tell us what you think about policy options set 003i (draft policy H16): Boarding School Accommodation.

There were 180 responses to this part of the question.



Option	Total	Percent
<b>Strongly Agree with Preferred Option</b>	84	26.75%
<b>Agree with Preferred Option</b>	40	12.74%
<b>Disagree with Preferred Option</b>	19	6.05%
<b>Strongly Disagree with Preferred Option</b>	10	3.18%
<b>Neutral/No answer</b>	19	6.05%
<b>Do not know</b>	8	2.55%
<b>Not Answered</b>	134	42.68%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
H16	Objection	Policy is unjustified. What is the justification for the accommodation being adjacent to the teaching campus?	The location of the new boarding development may affect the safety and amenity of students and local residents and neighbouring residential properties.
H16	No want for policy	Support of no policy	Noted
H16	Support of policy	Support of complete policy	Support is welcomed
H16	Support	ChCh supports this policy in the context of its own School requirements. Policy should acknowledge that new boarding accommodation can be provided either as a new building or conversion of an existing building, which may be in an alternative use.	The policy wording covers new or extended boarding accommodation. Conversions would be covered within this.

### Statutory Consultee Responses – Draft Policy H16

There were no statutory consultee responses to draft policy H16.

### All Public Responses to the Whole of Chapter 2

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
Chapter 2	Bring vacant homes back into use	Would welcome a policy around using CPO to bring empty homes back into use, along with retrofitting, to provide more affordable housing and an environmentally responsible approach to the housing crisis.	Although Oxford has a severe housing shortage, bringing empty properties back into use is not a statutory function. Oxford City Council encourages owners to bring empty homes back into use

Draft policy	Topic	Summary of comments	Response
			<p>through support, advice, and by imposing significant council tax premiums on long-term empty properties.</p> <p>The Plan supports retrofitting in Policy R3, which supports retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate.</p>

