

Background paper 003

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

This paper addresses Oxford's circumstances in relation to specialist housing provision including the provision of student accommodation, self build housing, housing for elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.

Relevant Local Plan Objective(s):

- Provide access to affordable, high-quality and suitable accommodation for all.

Relevant SA Objective(s):

4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

SEA theme(s): Material Assets, Population, Human Health.

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1. Introduction

- 1.1 This Paper considers the need for and policy response to various types of specialist housing accommodation. Housing need is considered in Background Paper 001, but in addition we are required to consider the needs for particular types of housing and occupants. Affordable housing need is discussed in Background Paper 002. This paper focuses on student accommodation, self-build and custom build homes, elderly persons and other supported care housing, gypsy, traveller and travelling showpeople, and boat dwellers.

Student Accommodation

- 1.2 There are two higher education institutions within Oxford – University of Oxford and Oxford Brookes University, and also a campus of the University of West London in Dunstan Road. Provision of good quality, well managed student accommodation will be required, located in close proximity to those institutions.

Self-Build and Custom Housebuilding

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

Elderly persons and other supported care housing

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

Gypsy, Traveller and Travelling Showpeople

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

Boat Dwellers

- 1.6 Residential boats and their dwellers on both permanent and temporary visitor moorings, contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable.

Boarding School Accommodation

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

Houses in Multiple Occupation

- 1.8 This paper sets out the context for Houses in Multiple Occupation (HMO) in Oxford.

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

National Plans, Policies and Programmes

National Planning Policy Framework and Planning Practice Guidance

2.1 The [National Planning Policy Framework](#) (NPPF) makes it clear that to support the Government's objective of significantly boosting the supply of home, planning authorities should address the needs of groups with specific housing requirements and that policies should be informed by a local housing need assessment. At paragraph 63, the NPPF states '*Within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.*'

Student Accommodation

2.2 Paragraph 04 (reference ID 67-004-20190722) of the [Housing Needs of Different Groups Planning Practice Guidance](#) (PPG) published in July 2019 and updated in May 2021 states "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."

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

Self-Build and Custom Housebuilding

2.4 The [Self-Build and Custom Housing Building Act 2015](#) (as amended by the [Housing and Planning Act 2016](#)) defines Self-build and Custom Housebuilding as "*the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those*

individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person”.

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

Elderly persons accommodation

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

Gypsy, Traveller and Travelling Showpeople

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

Boat dwellers

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

Boarding School Accommodation

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

Houses in Multiple Occupation

2.10 HMO developments are governed under two different aspects- the Housing Act governs the licensing (and Oxford also has additional licensing) and planning legislation governs changes of use. For planning purposes, HMO are categorised differently under the Town and County Planning Use Class Order) to standard residential dwellings (C3), as either a small or large HMO. A large HMO is a dwellinghouse occupied by more than six non-related occupants sharing accommodation that is not separated into self-contained units, and where some domestic facilities (such as bathroom, kitchen or living space) are shared. Large HMO fall into the Sui Generis use-class and require planning permission. A 'small HMO' is the use of a dwelling house by no more than six unrelated occupants who share basic amenities (e.g. kitchen and bathroom). It falls under Use Class C4, and the legislation permits a change of use from a C3-dwellinghouse unless permitted development rights have been revoked. Oxford has an Article 4 Direction that removes these permitted development rights. As such, no change of use to either category of HMO is permitted within Oxford City Council boundaries without acquiring planning permission in advance.

2.11 HMO are also required to obtain a licence to operate. The licensing powers and standards are set out in the Housing Act 2004 and The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, and the licensing scheme is run by Oxford City Council. The Housing Act 2004 (and its resulting licensing scheme) is not a piece of planning legislation per se, and rather sits outside of the planning process as it operates.

Regional and Local Plans, Policies and Programmes

Student accommodation needs assessment

2.12 The Updated Specialist Housing Needs Assessment (2025, Iceni), is a technical report which draws together various bits of data, including the profile of students in the city and the existing student accommodation profile of the two universities, including their future expansion plans. It is the latest report of its kind, updating the [Oxford Student Needs Assessment](#) (2023, Iceni). The report considers the local context of Oxford where there is a significantly constrained land supply, with different forms of development competing against one another. It makes some recommendations as to how the relevant policies in the Oxford Local Plan 2036 should evolve. These currently set out where new student accommodation can be located and as well as how many full-time taught course students can live outside of non-university provided accommodation.

Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment

2.13 The [Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment](#) (2024, arc⁴) was undertaken on behalf of the city and all district authorities

within Oxfordshire. It sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42 and establishes that Oxford City has a need of 0 for Gypsy and Traveller pitches and Travelling Showperson yards. However, the assessment does recommend that a criteria-based policy is included in any emerging plan for Oxford, as it provides a framework for assessing planning applications for these types of specialist housing. The assessment also clearly expresses that gypsies and travellers have different requirements from travelling showpeople and that this should be reflected in the criteria-based policy.

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

Specialist and Supported Housing Needs Assessment

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

2.16 The Updated Specialist Housing Needs Assessment (2025, Iceni) involved working with Housing LIN to produce an assessment of need for sheltered/retirement and extra care units based on the capacity-led population projections as detailed in the report. It suggests a slightly higher level of need than indicated in the OCC report above. The assessment identifies a need in Oxford to 2045 of 1,029 additional sheltered/retirement housing (412 social/affordable rent, 102 shared ownership, 515 market). It identifies a need for 322 extra care units (152 social/affordable rent, 24 shared ownership, 152 market). Additionally, the report shows a need for 43 supported housing units for those with learning disabilities and autism; an estimated 121 supported housing units for those with mental health needs; and a short-term need for up to 10 supported housing units for care leavers and unaccompanied asylum seekers.

Oxford Local Plan 2036

Student Accommodation

2.17 The [Oxford Local Plan 2036 \(OLP2036\)](#), adopted in June 2020 is the current development plan for the city and sets out agreed planning policies for the city against which decisions are made. Policy H8 seeks to restrict the provision of new student accommodation to

specific locations – either on or adjacent to existing university campus sites; within the city centre or district centre or on a site allocated in the development plan to potentially accommodate student accommodation. This approach was intended to continue into the Local Plan 2040, albeit with some more flexibility, allowing new postgraduate accommodation to be built adjacent to existing postgraduate accommodation.

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

Self-Build and Custom Housebuilding

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

2.20 In July 2022, following public consultation and updated government guidance Oxford City Council adopted a Local Connection Test to the Self-build and Custom Housebuilding Register to help understand the local demand for this type of housing within the city. This connection test splits the Self-build and Custom Housebuilding Register into two parts to provide a differentiation between those people with a local connection to the city (Part A) and those without (Part B).

Elderly persons accommodation

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

Gypsy, Traveller and Travelling Showpeople

2.22 Policy H12 is a criteria-based policy which sets out all the requirements to be met for any new pitches for the travelling community, including for travelling showpeople. The [2024 assessment carried out by arc⁴](#) confirmed that this approach could be continued into the new Plan but emphasised that the policy should reflect the differing requirements needed for gypsies and travellers, and travelling showpeople (the latter who need more space for equipment etc.)

Boat Dwellers

2.23 Policy H13 is a criteria-based policy which sets out all the requirements to be met for any new residential moorings or if appropriate, temporary visitor moorings. The [2024 assessment carried out by arc⁴](#) confirmed that the findings of the previous Oxford Boat Dwellers Accommodation Needs Assessment (2018) used to inform this policy has not changed and that the demand/ need for 41 new residential moorings in Oxford remains relevant.

Boarding School Accommodation

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

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

Student Accommodation

3.1 The latest [Authority Monitoring Report \(2024/25\)](#) indicates that both universities are currently operating within their respective thresholds for the number of students living outside of university-managed accommodation. The Iceni report (2025) does not find evidence to suggest that the current threshold of 6,000 across the two institutions should be changed currently. One application for new academic floorspace was approved during this period which was compliant with Policy H9.

Self-Build and Custom Housebuilding

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

3.3 Since its introduction in 2016, there have been 141 registrations (140 individuals and 1 group) on the Self-build and Custom Housebuilding Register (compared to 136 as of October 2023). As of January 2026 there are 76 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register (compared to 73 as of October 2023). Analysis of the addresses of those on Part B of the register suggests that a further 6 individuals cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand. The very small increases in each part of the register since 2023 show there has been an apparent decline in interest in recent years compared to years prior to this where the growth in the register each year was significantly greater.

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

Elderly persons and other supported care

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

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

3.6 There have been no planning applications for these types of development during the last few years. However, the criteria-based policies within the Oxford Local Plan 2036 ensures that a policy framework is present to ensure that these types of applications can be assessed should they be submitted in the future.

Boarding School Accommodation

3.7 There have been several planning applications for boarding school accommodation in recent years. An example includes St Edward's School Oakthorpe House (21/O2481/FUL), a development of 11 student rooms and a one-bed flat. This development commenced in 2022. Additionally, D'Overbroeck's School 472-474 Banbury

Road (22/O2661/FUL), a development of a 4-storey boarding house and 2 semi-detached dwellings. This development commenced in 2023.

Houses in Multiple Occupation

- 3.8 HMO provide a significant amount of accommodation in Oxford, forming an important and valuable contribution to the housing market. For many people, they offer the only available and affordable solution as renting individually or buying a property in Oxford is too expensive.
- 3.9 Oxford City Council maintains a record of licenced HMO in the city, and this provides an up-to-date view of the number of HMO properties registered. The Regulations only permit publication of licences that are in force and prohibit publication of licences pending or expired licences. As the data is real-time, the register can change on a daily basis. Licences are, however, not published until they are issued and are removed once expired. As of the end of October 2023 there were 2,964 active licences on the register.

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

Student Accommodation

- 4.1 In the short term, very little would change without a new Local Plan. The latest [Authority Monitoring Report \(2024/25\)](#) indicates that both universities are still operating within their respective thresholds set out in Policy H9 which allows up to a certain number of full-time taught undergraduates to live outside of university managed accommodation. The Updated Specialist Housing Needs Assessment (2025, Iceni), suggests that the thresholds remain suitable as the Universities are tracking the low growth scenarios as set out in the original assessment, however Iceni also do not believe the thresholds should be reduced.

Self-Build and Custom Housebuilding

- 4.2 Without a new local plan, the *Self-build and Custom Housebuilding (Register) Regulations 2016* would still apply and there would be a requirement for the City Council to keep the Self-build and Custom Housebuilding Register. Whilst this would help gauge an idea of the level of demand for Self-build and Custom Housebuilding, without an up-to-date local plan there would be no policy framework and demand for this type of housing may not be met.
- 4.3 With the cost-of-living increases and ongoing affordability issues for housing in Oxford, the loss of a policy that is supportive of this type of housing could result in individuals and organisations seeking to build/ develop this type of housing outside of the city boundary. Therefore, the potential contribution to the overall housing provision that could come through this route would be constrained.

Elderly persons and other supported housing

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

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

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

Boarding School Accommodation

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

Houses in Multiple Occupation

4.7 Without a new local plan, the HMO licencing regimes would still apply to existing or new HMO, which would help to ensure the quality of accommodation for all those living in HMO in Oxford. However, the licencing does not control the location or distribution of new HMO. Without an up-to-date planning policy there would be no policy framework to guide necessary supporting infrastructure and amenity considerations such as appropriate parking, cycle parking and bin storage. Importantly, there would also be no mechanism to guide the location and distribution of HMO across the city. With the cost-of-living increases and ongoing affordability issues for housing Oxford, there may be even greater pressures for increased numbers of HMO. Unrestricted, this could put pressure on the supply of family-sized homes, potentially leading to their loss, and could also lead to clustering of HMO. If these are then housing predominantly one group of residents, i.e. young people or students, this can affect the mix and balance of the community, and in some cases lead to a perception of loss of community cohesion and neighbourhood character.

5. Key issues addressed through the Local Plan

Introduction

- 5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2045 will need to take account of varying needs and impacts of specialist accommodation that meets the needs of different groups. Housing is a social need, so it is important to try to provide the right types of housing for those who need it. Specialist housing is not however one size fits all and the accommodation needs of different groups will vary. The policies of the Local Plan can help address the varied needs for different specialist housing types.
- 5.2 The plan assess and responds to the need for specialist housing provision in a number of ways. The Options that were considered at Regulation 19 are shown in Appendix 1 (the policy numbering has changed slightly as two policies were combined, so each is one number lower in the draft submission version of the Plan). The policies presented in the Submission Draft Oxford Local Plan 2045 have not varied in any substantial way from these approaches.

Student Accommodation policy approach

- 5.3 Oxford is a world-renowned brand for educational excellence, principally because of the historic University of Oxford and also due to the highly respected Oxford Brookes University. It is as a result of this reputation that Oxford derives much of its high profile and prosperity.
- 5.4 This success also creates many pressures in the city. Oxford's reputation attracts tourists, language students, publishing businesses, spin-out university enterprises and medical research. The city also has students studying at other institutions, and a number of short-term students who visit the universities and language schools. It means there are significant numbers of students requiring accommodation.
- 5.5 In Oxford at the point of the 2011 Census, there were 29,924 full-time students aged 18 and over. This had increased by 10% in the 2021 Census to a total of 32,888 full-time students. This equates to around 20% of the City's population. In the 2024/25 academic year there were 26,595 students in total at the University of Oxford (compared to 24,510 in 2019 and 27,290 in 21/22) and 21,856 students in total at Oxford Brookes (compared to 16,673 in 2019 and 17,470 in 21/22).
- 5.6 Oxford has several language schools that attract students from all around the world. Courses at these institutions vary from part-time and full-time, from one-off courses to month-long courses and longer. The number of students at these institutions is therefore highly variable and particularly seasonable. The Oxford Student Needs Study (Iceni, 2023) estimated that, based on the 11 language schools assessed, during the peak week of enrolment there were 1,984 students studying languages in Oxford. There are also five

Further Education Colleges. These are institutions that offer any study after secondary education that is not part of higher education (i.e. that is, not taken as part of an undergraduate or graduate degree). Courses range from basic English and Maths to Higher National Diplomas.

5.7 Because the majority of language school courses are only a few weeks this means the accommodation need is for temporary accommodation rather than any kind of permanent accommodation. Most of this need is met and will continue to be met through homestays with families and in student accommodation not otherwise in use over the summer months. Many of the further education colleges in Oxford serve the existing residential population, so students more often than not live in existing residential households, either as part of a family unit or independently. Several of the institutions do already have accommodation for students who do have an accommodation need. The Oxford Student Needs Assessment (Iceni, 2025) therefore finds no significant need for additional student accommodation for students at institutions other than the universities over the plan period.

Overall approach to managing the impacts of student housing need

5.8 The approach of the Plan is to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts they may have, on established communities and on the housing market.

5.9 The demand for student accommodation places two main forms of pressure on the local housing stock:

- students accommodated directly in private rented housing; and
- from student accommodation being developed on sites that may equally be suitable for other types of housing.

5.10 These pressures on the local housing stock act to increase rents, worsening affordability, and also mean that sites that might otherwise deliver onsite affordable housing may come forward for student accommodation that does not deliver any onsite affordable housing. An additional consequence where there is a high proportion of students can be the perceived or actual harmful impacts on the host community or neighbourhood. A concentration of student halls can mean that they dominate an area, meaning a high proportion of transient occupants in an area, and an established community that becomes more fractured and less strong.

5.11 A policy approach is needed to manage the pressures of students in the best way, while recognising and responding to the forecast needs of educational institutions that have a housing need (predominantly the universities). There is a balance to be struck between encouraging students into halls because it frees up family housing, and limiting student halls because they take up new sites that could be used for new family housing. Hence, the Local Plan approach is to limit the over-concentration of HMOs, only allow student

accommodation in the most suitable locations and encourage universities to provide accommodation (in these locations) through the thresholds policy.

Linking new academic facilities with the adequate provision of student accommodation (Policy H9)

- 5.12 Policy H9 links new or redeveloped academic accommodation to the delivery of associated residential accommodation. The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. In the case of the universities, this may be demonstrated if they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements such as teaching and nursing students and post-graduates on research-based courses. This longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market. In particular, the policy approach is designed to balance the needs of the student population as well as local residents.
- 5.13 If the threshold for either university is breached, that university is prevented from gaining planning permission for new academic facilities that create additional capacity for students. There have been and will continue to be applications for facilities where the argument has been made and accepted that the development is unrelated to student numbers and so the thresholds are not relevant.
- 5.14 This policy has operated effectively since the introduction of the 1991-2001 Oxford Local Plan (adopted 1997). That plan recognised that students have particular housing needs and that the institutions have some responsibility for housing their students in purpose-built student accommodation. It recognised that purpose-built student accommodation can have the least impact on the availability of housing to long-term residents of the city. Policies HO26 and HO29 sought to restrict the numbers of students living outside of university accommodation to 4,000 at the University of Oxford and Oxford Brookes respectively. The 2001-2016 Local Plan found lower thresholds to be achievable and also introduced the link to academic accommodation. Policy ED.6 set a threshold for Oxford Brookes of 3,500 up to 2008 and 3,000 after that date. Policy ED.8 set the same threshold for the University of Oxford. The approach was continued in the Core Strategy Policy CS25, which set a threshold of 3,000 for each university, and continued in the Oxford Local Plan 2036, with current thresholds of 1,500 at the University of Oxford and 4,500 at Oxford Brookes (applied to a narrower range of students than previously, that excludes research-based students)
- 5.15 The PPG makes it clear that these caps or restrictions can be considered if other options won't support the needs of the student population and local residents and if there is understanding of the accommodation needs of universities and other higher education establishments (Paragraph: 004 Reference ID: 67-004-20190722). Care has been taken to understand the accommodation needs of the universities when setting the thresholds.

The Oxford Student Needs Assessment (2023, Iceni) and the Updated Specialist Housing Needs Evidence (2025, Iceni) used various sources of data to understand the current situation. To assess student accommodation needs over the plan period to 2045 they gathered information about what sites are in the pipeline and what the universities' growth plans are, as well as comparing this to historic growth patterns.

5.16 The accommodation needs of students vary greatly. Different types of institutions have different needs (as outlined in the background section, many language school students, for example, come for short stays and are often in homestays or student halls that are vacant during the summer). However, even amongst university students, there is a variation in the type of accommodation that is needed. Clearly student halls are not the answer for every student, and there will always be students living out. Some students may already live in or near the city at home, and they do not need accommodation. Some post-graduate students could be studying for many years whilst also working at the university and student halls are not the most suitable accommodation for them. Therefore, the policy focus is on students studying full-time on taught courses (so this excludes post-graduate research students and students on vocational or sandwich courses whilst they are working). Setting the thresholds 5.16 To set thresholds going forward, we need to predict how much student accommodation there will be and how many of the types of students with accommodation needs there will be over the relevant period. The profile of students and student numbers are always evolving. Iceni were commissioned to carry out the Student Needs Accommodation Assessment, Iceni, 2023 (and Updated Specialist Housing Needs Evidence, Iceni, 2025). This looked at the current profile of students and used information from the universities to forecast it going forward. Setting the threshold (and monitoring the policy) requires an understanding of the number of students requiring university accommodation (according to the definition in the policy, which is full-time, taught course students) against the number of students living in university-provided accommodation.

5.17 Both universities have predicted a growth in student numbers, which we need to respond to. It is difficult to be certain over the longer term in respect of the future recruitment of students. Factors that can influence this may be within the institutions' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. government policy, macro-economic situation). Both universities felt unable to accurately forecast over more than a short timeframe. Therefore, a threshold has only been included in draft Policy H9 to 2033.

Threshold calculation (Policy H9)

5.18 The Student Needs Assessment, using information from the University of Oxford, predicts 18,366 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be an additional 809

rooms come forward in this time period, in addition to the 14,407 currently provided. This would leave a shortfall of 3,150 by 2033/4.

- 5.19 The Student Needs Assessment, using information from Oxford Brookes, predicts 10,670 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be the same amount as the current situation. During this time period, some of Oxford Brookes's nomination rights on third-party purpose-built accommodation will expire. Oxford Brookes has said they may not renew these nomination rights. However, they also consider that they have enough information from students to know if they are living in this kind of purpose-built accommodation. There is therefore a slightly different wording for Oxford Brookes as compared to the University of Oxford (who have said they do not have this information) about the accommodation that can be considered to be meeting needs against the threshold, to enable this accommodation to be counted. The current amount of supply is 5,576 (including some accommodation with nomination rights that will expire). This would leave a shortfall of 5,576 in 2033/34.
- 5.20 The thresholds in Policy H9 are set at a level that allows for the anticipated growth in students anticipated above, alongside the understanding of supply and pipeline supply of student accommodation. This means that growth is not constrained, but also that care is taken to ensure no new negative impacts from development that enables increases in student numbers, with a need to retain existing accommodation, or fully replace it.
- 5.21 Purpose built student accommodation is not suitable in all locations. The intention of Policy H8 is to ensure student accommodation is prevented in locations which are not suitable or desirable for students to live. The most suitable locations are on existing university sites where there is no conflict with other housing types.
- 5.22 The locational restriction also recognises that it is important to locate student accommodation in a way that avoids unacceptable changes in character and great increases in activity along quieter residential streets. The proposed restriction means that student accommodation can be delivered only on or adjacent to existing campuses and within the city centre and district centres. These locations are particularly suited to absorbing student accommodation and the levels of activity associated with it. Campuses and sites adjacent to them are suitable because everything is on hand for students and they are not affecting an existing residential area. District centres and the city centres are suitable locations because student accommodation is suited to being on the upper floors, for example above retail and also because it means students will be located in accessible locations where public transport is available to key campus sites. Furthermore, the policy will prevent the domination of student accommodation in established residential areas and will help to maintain the quieter residential character and amenity of these streets and prevent complete domination by student accommodation.

Self-build and Custom housebuilding

5.23 To inform the OLP2045 policy, an exercise has been undertaken to establish whether there is an adequate supply of sites with potential to accommodate self-build housing. Table B of the Strategic Housing Land Availability Assessment (2026) sets out those sites which have met the SHLAA criteria and have development potential. Of those sites with development potential, the sites with capacity for at least 100 dwellings, that have not already been built out, or that do not yet have the benefit of a planning permission, have been reviewed for suitability for self-build. Sites that are expected to come forward as either flatted schemes, or as student accommodation or other communal accommodation types, or as employer-linked housing (for example the JR Hospital site) have been excluded as these would not be feasible for self-build plots to be incorporated into a scheme. For sites expected to come forward as mixed-use development, the proportion of the site expected to be developed for residential use has been estimated. The review of the SHLAA sites suggests that there are six sites in the city that could come forward where it would be feasible to include an element of self-build housing. These sites are as follows:

Helaa Ref	Site name	Total site size (hectares)	Proportion anticipated for residential (ha)	Total minimum no. Of dwellings estimated
018	Diamond Place	1.85	1.0 (mixed use and discounting likely student accommodation)	135
0.28a	Kassam Stadium	6.52	3.4ha (Mixed use-discount likely car parking, replacement community facilities and commercial)	240
0.28b	Overflow Car Park at Kassam Stadium	2.29	2.29	100
113	Redbridge Paddock	3.64	3.64	200
289	Sandy Lane Recreation Ground	4.6	4.6 (assuming off-site reprovision of sports facilities)	250

590	Pear Tree Farm	2.03	2.03	111
TOTAL			16.96	

5.24 On the basis of the sites listed in the Table above, there is an anticipated 16.96ha for residential development where it could be feasible to incorporate self-build homes into the development. Policy H13 requires that 5% of the housing area of sites with potential for over 100 dwellings should be made available as self-build plots. The table above shows that 0.848ha would be available for self-build plots over the Plan period. Applying a 90 dwellings per hectare assumption, as the sites are predominantly gateway and district centre, would equate to around 77 self-build plots.

5.25 In terms of demand, there are 76 individuals on the Self-build and Custom Housebuilding Register that have demonstrated a local connection, so there is adequate supply identified in the table above to meet this demand and also additional potential demand as people are added to the register over the Plan period.

Elderly persons accommodation

5.26 Older people (including those who require retirement housing, housing with care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. Nationally, the population is ageing, and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8 in the South East, 2024, ONS), the population of those 65+ in Oxford is expected to grow by around 35.9%-38.7% by 2045 (representing 7,336-7,905 additional people in this age range).

5.27 Specialist housing for older people is provided in a range of formats and can include:

- Age-restricted general market housing, generally aimed at those over 55, potentially with some shared amenities but without on-site support or care services;
- Sheltered housing, typically purpose-built flats with some communal facilities, a warden and some support such as on-site assistance via alarm;
- Enhanced sheltered housing/assisted living, which will have additional services to enable people to retain independence such as some meals provided;
- Extra care housing, which has access to medium to high level of care with 24-hour access to support services and registered care staff and meals available; and
- Residential care/nursing homes, for those with a high level of dependency and which have rooms within a residential building and provide a high level of care for daily living.

5.28 The Oxfordshire County Council Specialist Housing Need Assessment 2024 and the Oxford Updated Specialist Housing Needs Evidence (Iceni, 2025) give a recent picture of the need for supported housing in Oxford. There is an anticipated net need for sheltered/retirement housing in Oxford to 2045 of 1,029 units, 515 of which are market and the rest affordable. For extra care housing, the net need to 2045 is 322, with 152 of

those market, and for care homes the need is 570. For market accommodation, it is expected that the market will respond by bringing forward specialist housing types, if there are available sites to bring forward.

5.29 Many sites are potentially suitable within the given criteria of Policy H12. Consideration was given to other approaches, such as requiring a certain proportion of sites to provide specialist accommodation, or requiring it as part of the affordable housing provision. However, this kind of accommodation can only feasibly be provided at scale. 135 units is considered roughly what is needed to make it feasible to run, because at that scale there are enough units to support the amount of specialist features, care facilities and servicing (such as cooking, cleaning and laundry) that are needed. This could not be provided as a small proportion of any site in Oxford and will only realistically come forward if a landowner is interested in using the site, or a fairly large portion of one of the larger sites, for this use.

5.30 The criteria set out in Policy are intended to ensure accommodation is well designed and located, so it is suitable for residents' needs and does not create traffic implications. It is important it is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

5.31 Another aspect of Policy H12 is that existing specialist care accommodation should be protected unless it is to be replaced elsewhere or unless it can be shown that it is surplus to requirements. Given that there is additional need for this accommodation over the plan period, and limited sites where it can be delivered, this is important, and existing sites offer potential for intensification, which may also help to meet needs.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

5.32 To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

5.33 To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Boarding School Accommodation

5.34 The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sites or

adjacent to them. This approach limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.

Houses in Multiple Occupation

- 5.35 In some areas of the city the concentration of HMO has resulted in changes to the character of the local area and has led to local parking problems and large numbers of transient households. This has been successfully managed by the threshold approach in the current and previous planning policy documents. There is therefore a clear case for continuing our existing threshold-based approach of development management for HMO of all sizes in Oxford. The policy approach therefore sets criteria to manage how and where new HMO are allowed and to restrict HMO numbers where there is already a high concentration of existing HMO.
- 5.36 The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them, yet sets criteria to manage them in a way that prevents an over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become a worsening overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.
- 5.37 The Oxford Local Plan 2036 introduced a policy approach allowing new purpose-built HMO, when these had previously not been prevented. This was to acknowledge that HMO do have a role in ensuring a range of housing provision. However, the vast majority of new HMO are traditional conversions. Where purpose-built HMO have been proposed these have been very large, and are generally aimed at students. There is a high risk that this policy approach will be used to circumvent other housing policies, e.g. relating to student accommodation location. Therefore, the Oxford Local Plan 2045 does not allow for new purpose-built HMO.

Appendix A: Options considered at Regulation 18

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

The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. For many, Houses in Multiple Occupation (HMO) offer the only available and affordable solution as renting individually or buying a property in Oxford is often too expensive. However high concentrations of HMO can result in changes to the character of the local area and it is therefore important that the supply of this type of home is monitored and controlled.

Table 1 - Policy options set 003a: Houses of Multiple Occupation (HMO)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).	This option would slow down the increase in the number of HMOs in specific areas where there are already significant numbers.	This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.
Option b Allow new purpose-built HMOs in appropriate	Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly tensions that can occur because issues such as car and bike parking	It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs. It is possible that large purpose-built HMOs will be put forward in locations not suitable for student accommodation, with the

locations, (potentially restricting the size of these in particular areas).	and bin storage can be integral to the scheme rather than retrofitting an existing building. This approach helps to address the unaffordability issues for people living and working across the city, offering another option to those who would struggle to access housing otherwise.	intention that they will house students and act like student accommodation.
Option c Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.	This approach would acknowledge that the character of some areas is already influenced by the presence of HMOs.	It would be difficult to select an area for the concentration. It may lead to difficulties in building and maintaining a strong community, although HMOs do not always mean transient populations.
Option d Do not have any restriction on HMOs.	HMOs can be an important part of the housing market; meeting needs of those who can only afford to share but who wish to live in the city. In that sense it can help contribute to a balanced community.	HMOs can lead to pressures on services and streets for example with more bins and parking pressure. Homes do not always have sufficient amenity space for multiple households. HMOs are often a more short-term solution for people, so can create transient populations.

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

Rationale: In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Options a and c represent alternative ways of addressing HMO proliferation, option a seeks to prevent a concentration anywhere above a threshold of 20% frontage, meanwhile option c instead defines geographically where HMOs would be accepted and where they would not. Option d is to not set any restrictions at all via the Local Plan. Option b could be carried forward on its own, instead relating to allowing new purpose-built HMOs but with restrictions on size, however it could also be combined with one of the other options.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly **criterion 4. Housing Need** in how they impact supply of new housing and deliver upon densification, as well as how they meet the particular needs of people on lower incomes. The options also impact on local amenity and street scene, as well as potentially the demand upon local services/facilities, which most closely matches **criterion 5. Inequalities, criterion 11. Urban design and criterion 6**

Essential services. Whilst options a, b and c are all likely to have positive impacts against housing need and inequalities as they serve to allow additional HMOs in varying ways to meet the needs of particular demographics, options b and c have the potential to have negative impacts against criterion 5, 6 and 11 where they could lead to additional harm to local amenity, character of the neighbourhood and additional demand on services locally (which option a seeks to avoid by ensuring the proportion of HMOs does not go above a certain threshold). Option c could lead to significant sustainability impacts particularly in relation to amenity and living environment in the areas that are designated as having no restriction, option d would further increase this impact by expanding the area of effect city-wide. Due to the varying level of sustainability impact arising across the potential options, it is considered justified to scope this option set in for detailed appraisal.

The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

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

whilst the lack of any restriction may not make a difference in some areas of the city, there is potential for a significant amount of HMOs to come forward in other areas at the expense of meeting other housing needs. It is for this reason that option D is not a preferred option.

The options set was tested through the Sustainability Appraisal with Option A and C scoring more positive than Option D. Option D scored negatively against SA objective 4 whilst options A and C had some positive and some negative. Option D also scored negatively against SA objective 11, whilst Option A was neutral and Option C potentially could have negative impacts, depending on implementation. Option B, which is an additional element to the policy that could be combined with the others, rather than an alternative approach to them, might have additional positive sustainability impacts, for example for SA objective 5 if it was to be taken forward, however, Option B is not proposed as part of the preferred approach as discussed above.

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

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

Table 2 - Policy options set 003b: Location of new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student	This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour. Student accommodation may be particularly suited to these locations, possibly more than	Limiting locations does mean institutions may be less able to meet their needs. Concentrating student accommodations in these areas may mean that district centres and the city centre could be dominated by these accommodation types.

accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.	general market housing, and it should help to achieve the high densities that these locations provide the opportunity for.	
Option b Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.	This approach widens the suitable locations for student accommodation and opens more potential sites. However, it still means that students would not be accessing student halls along quieter residential streets.	The definition of arterial roads and when a development is 'on' them needs to be clear (i.e. how much of a setback is acceptable, what if the entrance is on a side road?). However, it may mean that arterial roads change in character and become dominated by student accommodation for long stretches. The character of many arterial roads currently is that of quiet residential streets and student accommodation can be reported as having a negative impact on neighbours in these areas.
Option c Have no locational restriction on student accommodation but a criteria-based policy.	This would maximise the opportunity to meet student accommodation needs.	This approach would not help to address the competition between student accommodation and other housing types, potentially creating an imbalance within communities and drawing student accommodation into unsuitable areas.
Option d Allow new student accommodation only on existing campus	This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit	This approach would not allow us to meet the requirements of the NPPF because it would not provide for enough student accommodation to come forward to meet the needs. This would mean a greater number of students

<p>sites and on existing student accommodation sites.</p>	<p>feelings of disruption to communities of student accommodation that are sometimes reported.</p>	<p>in private rented accommodation, limiting its availability on the open market for others</p>
<p>Option e Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more (with potential to allow other occupiers outside of term-time if a management plan is agreed).</p>	<p>Full time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. Policy flexibility for outside of term time maximise occupation of the developments.</p>	<p>Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.</p>
<p>Option f Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow only operational and disabled parking, with the developer providing a mechanism to prevent</p>	<p>This supports the policy approach to put downward pressure on parking in the city. The location of new student accommodation will be in sustainable locations with good accessibility to public transport, walking and cycling routes offering a realistic alternative to using a private car.</p>	<p>Will require appropriate monitoring and enforcement and if that is not in place could result in more cars in the city putting parking pressure on adjacent streets.</p>

residents from parking their cars anywhere on the site, (except for disabled residents).		
Option g Do not have any management restrictions on new student accommodation.	Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.	Without proper management of student accommodation all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

Initial sustainability appraisal screening of options sets

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

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

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

Rationale:

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

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

residential parking. Option g is an alternative to Option e and Option e +f as it proposes not to have any management restrictions on new student accommodation.

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

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

Location of New Student Accommodation – Draft Policy H10

The preferred approach is a combination of **options A, E and F**. Options A, B, C and D were tested through the SA in order to further explore their potential sustainability impacts. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. Option A is supportive of locating student accommodation in the most suitable places adjacent to existing institutions or student accommodation sites to avoid potential issues with unneighbourly behaviour, and in sustainable locations such as city and district centres. Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high

densities that these locations provide the opportunity for, whilst ensuring that other sites that are most suitable for general market and affordable housing can be developed for those purposes. Options E and F ensure that full-time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. It also allows for policy flexibility for outside of term time to maximise occupation of the developments, whilst supporting the policy approach to put downward pressure on parking in the city.

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

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

Table 3 - Policy options set 003c: Ensuring there is enough student accommodation to meet needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if the threshold is breached. The details of the threshold will include the level set (which would reflect what is achievable)	This is a long-standing approach which has been successful in ensuring the universities continue to strive to provide accommodation for most of their students and that this is considered in their wider development plans.	This policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. To be fair and reasonable, this must be related to the development and any related growth in students.

<p>and the types of students it applies to (not all). The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.</p>		
<p>Option b Only permit new academic facilities (of all types proposed by the universities or other institutions) that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option (b) is linked to option (a).</p>	<p>This could also be applied to all academic developments that create a need for student accommodation, not just the universities. It ensures the institutions act responsibly by only undertaking developments that create new capacity for students if they show how they will be accommodated.</p>	<p>This may be difficult to enforce and monitor and will not necessarily be easy to make a judgement about whether a development will create increased demand for accommodation from students. A lot will depend on the submissions of the institutions, and it will be important the policy makes it clear the level of evidence expected.</p>
<p>Option c Have no policy linking new academic facilities to student accommodation.</p>	<p>This would mean new institutions could be established in Oxford.</p>	<p>This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.</p>

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, a+b, or c

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

Screened in for detailed appraisal? - No

Rationale:

Option a could be taken on its own - it seeks to set a threshold for (certain types of) university students living outside of university provided accommodation and prevent expansion of academic facilities should the threshold be breached. Option b expands on Option a by only permitting new academic facilities that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option c is an alternative to option a and option a +b as it proposes not having a policy linking new academic facilities to student accommodation.

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

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

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

The preferred approach for the Local Plan 2045 is to include a policy which sets thresholds for university students living outside of university provided accommodation and also prevents expansion of academic facilities if the threshold is breached. The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and

affordable housing which is a priority for this Plan. Of the three options considered, **Options A and B** in combination is the preferred approach which reflects this balance that needs to be struck.

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

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

Table 4 - Policy options set 003d: Homes for travelling communities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.	This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.
Option b Search for sites to allocate to meet an identified need.	This would ensure any identified needs were met within the city.	There is no justification to do this if no need within the city is identified. It might be that Oxford does not have any sites suitable for this use because of its compact urban character. Could unnecessarily preclude a site from other residential uses.
Option c Do not allocate sites or set out policy criteria – default to national policy	There may be no need to repeat national policy on this topic in the Local Plan. There would already be general policies of the plan that could be applied in these circumstances (for example on Green Belt).	In the event of a site coming forward there would not be any policy to help in the assessment of the impact, and there would be no guidance in the plan to suggest where that might go.

(Planning Policy for traveller sites).		
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Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Options a, b and c are all alternative approaches to one another.

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

Screened in for detailed appraisal? - No

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

Primarily relates to **criterion 4. Local housing needs** (meeting needs for a particular group), but also addresses **criterion 6**.

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

Homes for Travelling Communities – Draft Policy H12

To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

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

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

Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. There are several policy options below which suggest how this type of housing could be approached.

Table 5 - Policy options set 003e: Homes for boat dwellers

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.	Criteria can be developed to ensure that residential moorings have the facilities and services they need to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.	If proposals for residential moorings do not spontaneously come forward, then identified needs for moorings will not be met; this approach is not proactive in trying to meet this need.
Option b	If a site could be found this site would help to ensure identified needs are met. Current site	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable

Search for a site to allocate for new moorings.	allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.	sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
Option c Do not allocate sites or set out policy criteria.	None identified	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Options a, b or c are all alternative approaches to each other.

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

Screened in for detailed appraisal? - No

Rationale: All the options are alternatives to each other. Option a proposes not to allocate sites but to have a criteria-based policy should applications come forward. Option b would allocate a site to meet identified need, whilst Option c would not allocate sites or set out policy criteria.

Primarily relates to **criterion 4. Local Housing Need** (meeting needs for a particular group), but also addresses **criterion 6**.

Services (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact although this may depend on implementation, especially should an application for residential mooring be submitted as there is little national policy guidance in respect of moorings, therefore no clarity on how these applications will be assessed could be given. Option a and b are potentially a minor positive in helping to meet housing need (criterion 4) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6) - either through the criteria as in option a or in the

process for allocating the sites as in option b. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Homes for Boat Dwellers – Draft Policy H13

To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

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

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

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

Table 6 - Policy options set 003f: Elderly persons' accommodation and other specialist housing needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is supportive of elderly persons' accommodation of all	This approach ensures elderly persons' accommodation is in the right locations to provide the best quality of life for residents, making sure they have good local access to needed facilities	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

<p>types, but with criteria to be met that ensures it provides good quality living accommodation, is in accessible locations and is part of a mixed and balanced community.</p>	<p>and that they are not isolated and cut off from the wider community.</p>	
<p>Option b Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.</p>	<p>This would maximise the potential for proposals for elderly persons accommodation to come forward.</p>	<p>This would not require elderly persons' accommodation, so wouldn't necessarily result in its delivery. It could result in accommodation coming forward in unsuitable locations where the residents become or feel isolated.</p>
<p>Option c Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.</p>	<p>There are a range of specialist housing needs in the city, which are expected to increase over time. It is not feasible to require a whole site to be used to meet these needs. This approach provides a potential means of delivering housing to meet these needs. This approach would help deliver mixed and balanced communities and meet the widest range of needs.</p>	<p>This approach would reduce the amount of regular affordable housing provided to meet the needs of those on the housing list, which is the greatest need in Oxford. The need may still be too great to meet without too much harm to other aims, and it will be difficult to set a justifiable threshold for sites if it is not set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. Ultimately, in Oxford this policy is likely to be ineffective because there are simply not large enough sites available for this approach to be feasible. That is because there is a critical mass of units that are viable to manage. This need may be met on strategic sites just outside the city, or on sites where the developer makes a decision to bring</p>

		forward a scheme wholly of this type of accommodation.
Option d Include a policy that is restrictive of types of elderly persons' or supported accommodation, for example private market flats available to older people but with limited onsite support.	This could prevent an imbalance in the type of elderly persons' accommodation, for example a large amount of expensive private accommodation with minimal care on-site.	An attempt to restrict elderly persons' or supported accommodation of any type generally is unlikely to be justified or beneficial, as some needs will be met by all types of elderly persons' accommodation. This would also limit opportunities to downsize and free up larger homes to the market.
Option e Do not include a policy relating to elderly persons or other supported accommodation	This would allow the market to respond to need spontaneously and without restriction.	It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs, it could lead to no new accommodation of this type or it may lead to unsuitable accommodation in unsuitable locations that does not help to address needs.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - the options are standalone options, rather than ones that could be combined.

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

Screened in for detailed appraisal? - No

Rationale: Only one of the options would actively require supported housing; the others are either supportive of it to a greater or lesser degree or would restrict particular types (in order to encourage others). Even the approach that actively requires supported housing could only apply to very few sites in Oxford, so would not have an impact significantly greater than the other options.

PARA summarising the likely sustainability impacts (if any) in relation to the 12 SA criteria

Older Persons and Other Specialist Accommodation – Draft Policy H14

The preferred approach for the Local Plan 2045 is to have a local policy that sets criteria to guide where and how this type of accommodation comes forward. It is not proposed to set any kind of requirement for this housing type. That is because of the lack of opportunity to do so in the city, which lacks sites of a large enough capacity.

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

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

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

There are several policy responses that could be considered.

Table 7 - Policy options set 003g: Self-build and custom house building

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require a proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-	Gives an opportunity for being able to build your own home in a very constrained city. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet

<p>build plots for large sites, for example all sites over 100 dwellings). Set threshold to meet identified need.</p>		<p>to really be tested so it could be that this does not meet needs or provides more plots than the level of interest and creates delays in delivery. Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.</p>
<p>Option b</p> <p>Require a smaller proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-build plots for a larger number of smaller sites, for example all sites over 10 dwellings</p>	<p>This approach could give more certainty that sufficient plots will come forward, because it does not depend on large sites being delivered, and large sites are more easily delayed and the delay of one site when the policy only applies to a few would have a greater impact. Therefore, this may give a greater opportunity for those on the self-build register to gain land to develop their own property.</p>	<p>The more land given to self-build housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Marketing of singular self-build flats on multiple sites is likely to be very challenging and unlikely to be practical.</p>
<p>Option c</p> <p>Allow exceptions to the policy where this would not work well (e.g. only flats, student accommodation). Set thresholds to meet identified need.</p>	<p>Such a policy approach ensures that this type of housing is only made available on sites where it would work well.</p>	<p>Sites that would allow exemption would be developed with no self build opportunities.</p>

Option d Include a criteria-based policy which is positive towards but not requiring of self-build	Such a policy approach supports the delivery of other housing beyond self-build and custom build which is where there is the greatest need.	Without a specific policy there is potentially limited scope for people to find self-build plots, or custom housebuilding. This is not compliant with the Government's approach, which requires us to meet the need for self-build and custom housebuilding.
Option e Include in the policy that any self build plots that have been marketed but not sold over a specified time (e.g. 12 months) should be built and brought forward as dwellings in the usual way.	Such a policy approach gives an opportunity for those interested to gain land to develop their own property but acknowledges that if the plots have been marketed yet have not sold then they should be made available for the delivery of non self build housing as this is where there is greater need.	Demand for self-build plots may vary over time and any new additions to the self-build register would have reduced opportunities to develop their own properties as these plots would be lost.

Initial sustainability appraisal screening of options sets

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

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

Screened in for detailed appraisal? - No

Rationale: The self-build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self-build housing to come forward. The local context in Oxford leads to several potential options for how best to formulate a policy. Options a and b represent different levels of scope over which to apply a requirement (applying to either large sites only or sites over a smaller size threshold), whereas option c allows an exception to the prescriptive policy in

circumstances where the provision of self built plots could undermine the delivery of other types of housing. Option d represents a more influential as opposed to prescriptive approach. Option e represents an additional dimension that could be incorporated with both options a and b or alongside option a or b.

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

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and whilst focusing on larger sites (option a) concentrates delivery, focusing on smaller sites (option b) means that there is more dispersal geographically which could increase delivery times. Potentially option a could have a greater risk of homes not getting finished/ delivered as more smaller sites are likely to come forward than larger ones. Option c would likely have positive impacts. Option d of not having a prescriptive approach would likely be neutral impact. Option e could have either a neutral or more positive impact, more positive if the plots are built out for self build but neutral if they are built out as non-self build. Overall the differences between the likely impacts of the options are not considered to be significantly different, none of the options have major impacts on sustainability.

Self-Build and Custom Housebuilding – Draft Policy H15

To support people wishing to build their own homes, the preferred approach for the Local Plan 2045 is to include a policy that requires self-build/ custom built plots to be made available.

Of the five options, either option or various combinations of these could be taken forward. The preferred approach is a combination of **Options A, C and E** which will provide an opportunity for this type of housing to come forward on sites that are suitable and where

it would work well, yet also ensures that any plots marketed for self build that have not sold after a certain period of time can be made available for other housing as this is where there is a greater need.

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

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

Table 8 - Policy options set 003h: Community-led housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is generally supportive of community-led housing but does not have any requirements.	Gives an opportunity for being able to build your own home in a very constrained city, or develop community led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	This approach would actively ensure this housing type comes forward, so would not necessarily result in it being delivered.
Option b Require a proportion of the total site area to be available to groups wishing to develop community-led housing (for example of over 100 dwellings).	Gives a greater opportunity for community-led housing groups, to gain land to develop their own property.	More land given to community-led housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any requirement for self and custom housebuilding could lead to a significant decrease in the delivery of other housing types for which there is a greater need, including all tenures of affordable housing.

Option C Do not have a policy that is supportive of community-led housing schemes.	Such a policy approach supports the delivery of other types of housing for which there is greater need.	Without a specific policy there is potentially limited scope for people to join community-led housing schemes.
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Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - a, or b, or c

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

Screened in for detailed appraisal? - No

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

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

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

Community led housing – Draft Policy H15

To support community-led housing schemes, the preferred approach for the Local Plan 2045 is to include a policy that supports this type of housing. Of the three options, either option could be taken forward. The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward on sites that are suitable. Although acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, community-led housing has been incorporated within policy H15 rather than a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

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

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

Table 9 - Policy options set 003i: Boarding School Accommodation

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

accommodation would be permitted, for example to allow it only on existing school sites.	avoid potential issues with surrounding neighbourhoods.	
Option c Do not include a policy relating to boarding school accommodation.	Boarding schools would have no restrictions on developing accommodation to meet their own needs.	This may cause the loss of C3 dwellings or compete with opportunities to deliver C3 dwellings, and may also cause harm to local neighbourhood and character of the area.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? -

High-level screening conclusion? - The options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

Rationale: In terms of options, it would be appropriate to consider having a policy as there is no specific NPPF guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy. There have been several recent planning applications for boarding school accommodation, demonstrating local demand. This type of accommodation is not classed as residential and does not form part of Oxford's housing need. The inclusion of a policy would enable the monitoring of growth and ensure that boarding school accommodation is granted where appropriate and not competing for much needed residential dwellings and development.

In terms of sustainability impacts, the different options all score against **criterion 4. local housing need** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a neutral impact as this policy won't necessarily create or bring forward any new residential homes. Option b would have a neutral impact as it would be permitting limited development but still not bringing forward new residential development (although does the most to avoid competition with it). Option c could potentially have a minor negative impact as without a policy it could reduce sites available for residential development. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option.

Boarding School Accommodation – Draft Policy H16

The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sites or adjacent to them.

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

