

# Oxford Strategic Housing Land Availability

## Assessment January 2026



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# 1. Introduction

## 1.1 Background

1.1.1 Capacity for new homes is a key issue for LP2045 because – as with previous local plans – the constrained nature of the city means that there is a greater need for new homes than there is capacity or supply of sites for development.

1.1.2 It is therefore essential to have a robust and thorough assessment of opportunities for sites, in order to inform difficult decisions in the plan: some of which might compromise other plan objectives (such as protecting green spaces) and ultimately asking adjoining authorities to help accommodate unmet needs.

1.1.3 An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The Strategic Housing Land Availability Assessment (SHLAA) assesses sites for opportunities for net additional housing either through reuse or intensification of existing brownfield land, or through development on unoccupied land including greenfield land. However, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

1.1.4 The last full SHLAA was published in September 2023, supplemented by an Addendum published in March 2024, both to support the Oxford Local Plan 2040 submission. This SHLAA brings the evidence up to date to 2026, to support and inform the Local Plan 2045 Regulation 19 stage.

1.1.5 There are some key points that should be acknowledged with reference to this SHLAA:

- The SHLAA does not allocate land for residential development. It simply identifies sites with development potential. It assesses land which is considered to be available during the plan period 2025-2045 and which is potentially suitable in so far that there are no specific factors identified that may constrain development, but the SHLAA does not in itself determine whether a site should be developed. The decision regarding where housing and economic uses should be built in the future is made through Local Plans (including Sustainability Appraisal), and through the planning application process when judging planning applications;

- The inclusion of a site within the SHLAA does not preclude the site being developed for other uses; and
- The SHLAA is based on the information available at the time: It is a ‘snapshot’ of the capacity at that point. Therefore, the assessment and conclusions about sites may be subject to change over time, for example site boundary changes to reflect land ownership, constraints may be overcome/mitigated or additional constraints identified, development delivery timescales may change, and site capacity or densities may change.

## 1.2 Planning policy context

1.2.1 The National Planning Policy Framework (NPPF, December 2024 version<sup>1</sup>) sets out the requirement for every Local Planning Authority to produce an assessment to undertake a housing land availability assessment (paragraph 72). This SHLAA fulfils the requirements as set out in NPPF and associated Planning Practice Guidance Housing and Economic Land Availability Assessment<sup>2</sup>, for the assessment to:

- 1) Identify sites and broad locations with potential for development;
- 2) Assess their suitability for development and the likelihood of development coming forward (the availability and achievability); and
- 3) Assess their development potential.

1.2.2 These stages are explained in more detail in the methodology section below.

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<sup>1</sup> [https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

<sup>2</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment> 27 November 2025 version

## 2. SHLAA Methodology

2.0 This section sets out the methodology and key assumptions applied in the assessment. It explains how the NPPF requirements and Guidance has been interpreted and applied to the Oxford context, as well as applying the principles agreed in the Oxfordshire Joint Housing and Economic Land Availability Methodology (November 2021).

### 2.1 Relationship with the Employment Land Needs Assessment

2.1.1 An up-to-date assessment of employment land is important to ensure there is an understanding of, and evidence for, the total stock of employment land to compare against future demands. The Employment Land Needs Assessment (ELNA, 2025) considers the relationship between the available supply of employment floorspace and the objectively assessed employment floorspace needs for Oxford for the plan period.

2.1.2 Employment sites are included in the SHLAA, because some sites might be mixed use, and some employment sites might have capacity for residential development during the plan period either through change of use or intensification. The findings of the ELNA have also been used to inform the assessment of sites in SHLAA, such as updated information about landowner intentions to assess the likelihood for potential change of use from employment to residential. To reduce duplication, a more in-depth assessment of employment sites is included in the economic evidence base for the Local Plan. So, whilst employment sites are included in Table A (initial stage of site assessment) of the SHLAA, they are not then assessed in greater detail in the SHLAA and are instead discussed further in the employment background paper. Mixed use sites which include employment are however shown in Table B of the SHLAA to assess the residential element of its capacity. All key employment sites are included in the SHLAA.

### 2.2 Engagement in undertaking the SHLAA

2.2.1 The Council has worked with stakeholders throughout the preparation of this SHLAA. This includes regularly working with adjoining local planning authorities, in line with the duty to cooperate. The Council has also worked closely with landowners and promoters to maintain an up to date understanding of their intentions for sites, and with statutory bodies, as part of the work to prepare site allocations and prepare this SHLAA. Views have also been sought from the public and other stakeholders via several call for sites exercises encouraging submission of any sites which should be added to the assessment (also see Call for Sites section later in this report, Sources of Sites).

## 2.3 Stage 1: Identifying sites to be assessed

### Determining the assessment area

2.3.1 The assessment area is the Oxford City Council administrative boundary.

### Site size threshold

2.3.2 Historically, the Oxford SHLAAs have applied a site size threshold of 10 dwellings or 0.25ha for residential sites. Since the 2023 SHLAA, further testing has been undertaken to explore whether it would make the SHLAA more robust to amend the site size threshold.

2.3.3 The Guidance is flexible about site size threshold: "It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. Plan-makers may wish to consider alternative site size thresholds"<sup>3</sup>.

2.3.4 Analysis was undertaken of the small site commitments, to review how much capacity could potentially be identified if the site size threshold were reduced to 5 dwellings (i.e. sites of 5-10 would be identified in Table B rather than in the windfall allowance and small sites commitments figure).

2.3.5 The conclusion of this analysis is that only including sites with capacity to deliver 10+ net gain dwellings (or approximately 0.25ha) remains the most appropriate threshold for the Oxford SHLAA for residential sites.

2.3.6 This is because of quite specific circumstances of the housing land supply in Oxford and the typical sites that deliver new homes, that is different to the surrounding more rural districts. In summary:

- The urban character of Oxford and the nature of sites in Oxford, means that sites of 5 or fewer dwellings inherently come forward as windfall because they tend to be conversions (e.g., subdivision of a residential house into separate flats, or conversion of office/storage space above retail units) or very small infill (e.g., 1 or 2 units in a garden). These types of opportunities are so small in scale and opportunistic that they aren't the sort of development that landowners or small-scale builders would put forward for inclusion in a SHLAA;
- The permissive approach of the policies in the Oxford Local Plan towards new residential, is such that there is unlikely to be the same impetus for landowners or

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<sup>3</sup> Paragraph: 009 Reference ID: 3-009-20190722

agents to try to get their site allocated or included in a capacity assessment, because the principal of new residential development is typically supported anyway. If the SHLAA were to include sites of 5-10 dwellings, then the main data source would instead be those sites with planning permission or planning applications.

- Small sites with planning permission are already counted within the overall capacity calculation in the SHLAA (“small sites contribution” for years 1-3) or captured by the windfall allowance for small sites in the capacity calculations (applied from year 4 to the end of plan period). As such, if the threshold for sites in the SHLAA were to be reduced to 5 then those two inputs into the capacity calculations would need to be reduced correspondingly in order that the contribution from those sites is not double counted.

2.3.7 Sites which do not have demonstrable capacity for 10+ net gain, are therefore not identified in the SHLAA Table B identified sites capacity calculation but are instead accounted for via the windfall allowance calculation or small sites commitments. For sites which are small but have robust evidence to demonstrate that they can deliver a net gain of 10+ units, such as an extant planning permission, they would be included in Table B. The exception to this, is sites submitted in Call for Sites or local plan consultations which are judged to not have capacity for 10+ net gain. Those are included in the Table A assessment, then if meeting the basic tests (Available/Suitable/Achievable) are then listed in Table C for transparency. Some sites in Table C are larger than 0.25ha so may appear to have greater capacity, but for various reasons are unlikely to achieve a net gain of 10+ dwellings, this is often because there are existing residential uses on the site and there is unlikely to be sufficient capacity for any significant net gain. Sites in Table C are counted within the small site commitments/windfall parts of the overall capacity calculations, if they are brought forward by the landowner with developments of less than 10 dwellings. Or alternatively, if it is subsequently demonstrated that they can deliver 10+ dwellings (e.g. a planning permission is issued) then they would be moved to Table B and counted as identified capacity in the SHLAA.

2.3.8 This approach is considered to be thorough but proportionate, to reflect the nature of typical sites in Oxford and that so many are small infill or conversion sites that come forward as windfall and are typically not promoted by landowners in advance. This is also consistent with the Joint Oxfordshire Methodology, which notes the circumstances in Oxford merit a bespoke approach.

Residential Size Threshold:

Cherwell District Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council: Sites and broad locations capable of delivering 5 or more dwellings or with an area of at least 0.25 hectares.

A site or broad location submitted to a Council (for example through a call for sites or planning application) as having capacity for five or more dwellings will be included in the HELAA. If no capacity has been proposed (for example in respect of officer identified land) a size threshold of 0.25 hectares will be applied.

Oxford City Council: Sites and broad locations with an area of at least 0.25 hectares.

Reason: This is due to the large number of small sites in Oxford, many of which are infill developments that are hard to identify.

*Figure 1 – Extract from Oxfordshire Joint Housing & Economic Land Availability Assessment Methodology, 2021*

2.3.9 The site size threshold for economic uses is 0.25 ha or 500 m<sup>2</sup> of floorspace which is in line with the Guidance.

### Sources of sites

2.3.10 Sites assessed were drawn from the following sources to meet the requirements of the SHLAA guidance and the Oxfordshire Joint Methodology. The original source of a site is listed in the “How site identified” column of Table A. The majority of sites assessed in this SHLAA were rolled forward from the previous SHLAA and simply re-assessed and updated, but additional sites were also identified. The sources of sites include:

- The Call for Sites which has remained on the LP2045 webpage throughout the preparation of the plan, so landowners or other interested parties could submit sites at any time. In addition, the City Council undertook a “call for sites” in Spring 2025 requesting any new sites or updates to previously considered sites. This included contacting all the major landowners, planning agents, public bodies, large institutions and registered providers known to the City Council, as well as people on the LP2045 consultation database. In addition, at the Regulation 18 stage consultation (Summer 2025) landowners were contacted and asked for updates and also whether there were additional sites in their ownership which they wished to promote. Through the landowner dialogue on the draft site allocations, we also specifically asked landowners about sites in Table B and also other land in their ownership that they may wish to be included in the SHLAA assessment. Most recently, a further Call for Sites was undertaken (Autumn 2025) when the decision was made to adjust the local plan timescale from 2020-2042, to 2025-2045, in case

there were any sites which might come forward in the revised time period which had not already been included in the SHLAA.

- Sites that were already subject to the plan making process, e.g. allocated sites, omission sites from LP2040 examination;
- Sites that have extant planning permission, or a resolution to grant planning permission, or are under construction (or completed since 1 April 2025). A search for the relevant applications was made for the period since the last SHLAA. Sites or phases fully completed in the years prior to 1 April 2025 are not counted within the SHLAA Table B identified sites capacity calculation as they are outside of the LP2045 Plan period 2025-2045. These sites are also not considered to be 'available' in Table A as the development has completed recently so are unlikely to be redeveloped again within the plan period. The exception to this is if a landowner has specifically expressed an intention to further redevelop or intensify uses on the site during the plan period;
- Planning refusals/withdrawn applications. A search for the relevant applications was made for the period since the last SHLAA. Relevant applications prior to this would have been already included from the previous SHLAA;
- Lapsed permissions;
- Sites with a planning application being considered, or at pre-application stage. A search for relevant applications was made to cover the period since the last SHLAA. Pre-application discussions are confidential however we contacted relevant landowners to encourage them to submit a Call for Sites form, which we could then use as public evidence for the SHLAA and the Local Plan evidence base;
- Any sites that were identified in the ELNA as having potential for additional employment or housing;
- City Council owned sites;
- Brownfield Register; and
- All sites that were assessed in the 2023 SHLAA Table A were reassessed and updated where applicable.

2.3.11 As with previous SHLAAs, a desk-based mapping exercise was also carried out to actively identify any other potential sites that may help to meet Oxford's development needs which may have been missed by the processes set out above.

### Land uses included or excluded

2.3.12 This section explains why different types of land are included or excluded from the SHLAA search for sites. The Guidance sets out that constraints should be considered when

assessed the suitability, availability and achievability of sites, reflecting footnote 6 of the NPPF<sup>4</sup>.

2.3.13 Reflecting the significant need for housing in Oxford, the general approach in the SHLAA search for sites is to cast the net as widely as possible and explore all reasonable opportunities to identify capacity for housing in Oxford. So sites with the following types of constraints are all still included: greenfield sites, Green Belt/Grey Belt, open air sports facilities, green infrastructure corridors, locally designated wildlife sites (Local Wildlife Sites and Oxford City Wildlife Sites). For such sites, the constraints are identified (see Table A, Policy considerations and Physical/Environmental considerations columns), including where they would restrict development, but they are not ruled out outright they are still assessed to weigh up the balance.

2.3.14 Within the Oxford City boundary there are, however, some clear intrinsic designations where development (housing or employment) would be unsuitable. Therefore, excluded from the assessment are areas in undeveloped Flood Zone 3b, the SAC, SSSIs and Town Greens. The exception to this is if individual sites are identified through being an existing site allocation or suggested by consultees or Call for Sites, then the site was included even if it is in an excluded designation. This is to ensure transparency of process and comprehensiveness.

2.3.15 These inclusions and exclusions are explained in more detail in the rest of this section.

Table 1 Summary of land types included or excluded from areas of search

Land type / designation	Inclusion in SHLAA site search	
Flood zones 1, 2, and 3a (greenfield or brownfield), and 3b (previously-developed only)	✓	
Flood zone 3b greenfield		✗
Special Area of Conservation (European designation)		✗
Site of Special Scientific Interest (National designation)		✗
Local wildlife sites / Oxford city wildlife sites	✓	
Green infrastructure network (also encompassing blue infrastructure)	✓	
Green belt and grey belt	✓	
Outdoor sports	✓	
Allotments	✓	

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<sup>4</sup> Paragraph: 002 Reference ID: 3-002-20190722

Town Greens		x
Employment sites	✓	
Other brownfield land	✓	
Other greenfield land	✓	

### Flood zones

2.3.16 Flood Zone designations are intrinsic designations and there is clear national guidance in the NPPF and PPG, on what should and should not be developed in them. In the NPPF dwellings are classed as a 'more vulnerable use' and are allowed in Flood Zones 1, and 2 if the Sequential Test is passed. Dwellings are only allowed in Flood Zone 3a if a Sequential and an Exception Test is passed. Vulnerable development is not permitted in Flood Zone 3b according to the NPPF. Similarly, economic uses such as office and industrial are classed as 'less vulnerable' but are still not considered suitable in Flood Zone 3b.

2.3.17 Oxford has large areas of land which are at risk of flooding. Some of this is functional flood plain, such as Port Meadow, but there is also a lot of development which already exists in the areas at highest risk of flooding. This is generally older development that hasn't been designed with modern technology and doesn't incorporate features such as Sustainable Drainage Systems (SuDS) that help to minimise the impacts of flooding on both the existing properties and elsewhere.

2.3.18 The NPPF allows only water-compatible uses and essential infrastructure in Flood Zone 3b, which would prevent the redevelopment or intensification of existing buildings in areas of Oxford at the highest risk of flooding. However, there are not enough sites in Flood Zone 1 and 2 to meet identified needs for residential or other uses.

2.3.19 So a bespoke approach has been developed in partnership with the Environment Agency in order to be pragmatic about making best use of sites in Oxford, balancing wider sustainability objectives, and to avoid sterilizing sites from modernisation or other redevelopment which could help make them more sustainable. The bespoke approach developed with the Environment Agency for Oxford however, is to allow very careful re-development of brownfield sites in Flood Zone 3b. This is to make best use of previously developed sites in the generally sustainable location of Oxford and also because new development has the potential to improve flood risk mitigation measures. This approach is a pragmatic response to the specific circumstances in Oxford to avoid sterilising sites in Flood Zone 3b. The bespoke approach sets out that sites within Flood Zone 3b will be considered for development subject to very specific criteria. Conditions include that the overall built footprint is not increased, and that flood storage is not lost. Previously

developed sites in Flood Zone 3b have not, therefore, been excluded from consideration in the SHLAA.

2.3.20 The approach was developed as a policy approach for OLP2036 and in agreement with the Environment Agency has been carried forward to LP2045 with further refinement. Specifically, the LP2045 also requires that development should not result in an increase in flood risk vulnerability classification within Flood Zone 3b. This is supported by an up-to-date SFRA (2025).

2.3.21 The Environment Agency has also set out guidance as to how sites should be assessed which are currently within Flood Zone 3, but which in future will benefit from the construction of flood defences. This is particularly relevant to the western part of Oxford where a new 'western conveyance channel' flood alleviation scheme is proposed (Oxford Flood Alleviation Scheme 'OFAS'). The EA advice is that flood alleviation measures are designed to reduce fluvial flood risk to benefit existing properties and infrastructure in the City, rather than to open up areas of the city for future housing development. The purpose of the OFAS is to improve the flood risk situation for existing businesses and residential properties. It does not "improve protection" of land for planning purposes. This is because the undefended levels need to be considered when assessing any planning application (i.e. without the OFAS). The Environment Agency has always been very clear about this, and this position is reflected in the assessment of sites in the SHLAA to be consistent with the Environment Agency advice and the NPPF.

2.3.22 As such, sites within areas which will in future potentially benefit from OFAS, must still be assessed as the flood zone scoring as it is at the point of undertaking this SHLAA. This SHLAA takes into account the 2025 Environment Agency flood risk data and the 2025 Strategic Flood Risk Assessment for Oxford, to help inform the suitability of sites and the need for buffers or adjustments to the capacity of the site.

*Summary: sites in Flood Zones 1, 2, 3a are included in assessment, also Flood Zone 3b if brownfield, and sites where there is a small element of Flood Zone 3b greenfield. Only entirely Flood Zone 3b greenfield sites are excluded, unless specifically identified through call for sites or consultation.*

## Nature conservation designations

2.3.23 Consistent with the NPPF (paragraph 187), LP2045 seeks to protect sites with biodiversity value and ecological value from development. This protection includes international/national designations such as the Special Area of Conservation (SAC) and the Sites of Special Scientific Interest (SSSI), as well as locally designated sites such as Oxford City Wildlife Sites and Local Wildlife Sites. There are also other types of habitats

protected to varying degrees across the city including amongst the wider green infrastructure network. The protection is particularly strong in terms of development occurring directly on designated sites but can also factor in impacts of development arising in close proximity.

2.3.24 There is a case to be made that because the Local Plan approach is entirely consistent with the NPPF then all nature conservation designations should be excluded from the assessment area. However, for the purposes of this assessment and reflecting the pressing need for housing capacity, only the sites protected by statutory national or international designations (SSSI and SAC) have been excluded. To ensure a thorough assessment, locally designated wildlife sites and the wider green infrastructure network have been included within the assessment despite the importance drawn to wildlife corridors in the NPPF. When sites which adjoin or are nearby to nature conservation sites are assessed for capacity in Table B, their potential impact upon nature conservation sites is also considered.

*Summary: locally designated sites (Oxford City Wildlife Sites and Local Wildlife sites), and the broader green infrastructure network are included. SACs and SSSIs are excluded from assessment unless specifically identified through call for sites or consultation.*

## Green Belt

2.3.25 Green Belt is a policy designation rather than an intrinsic designation therefore the boundary is capable of being altered. The NPPF allows for Green Belt boundaries to be reviewed in exceptional circumstances through the preparation or review of a Local Plan (paragraph 145, NPPF). Such circumstances may include the need to allocate land for development, where suitable land is not available outside the Green Belt, and indeed LP2036 and LP2045 include site allocations for residential development on former-Green Belt sites. This SHLAA also includes sites within the Green Belt in the assessment.

2.3.26 The majority of the Green Belt within Oxford City forms the river corridors of the Thames and Cherwell acting as floodplain. The river corridors run either side of the city, providing its characteristic form and enclosing its historic core. Many of these areas are also designated for nature conservation, and/or green and blue infrastructure network value. Because much of the Green Belt area in Oxford is Flood Zone 3a/3b then much of it is likely to be unsuitable based on flood risk irrespective of the Green Belt or other designations but have nonetheless been assessed in Table A to ensure a thorough assessment.

2.3.27 An updated Green Belt Assessment (LUC, June 2025 and December 2025) has been undertaken to inform LP2045. The methodology undertaken in this assessment reflects the

latest changes to the NPPF and PPG and builds upon previous Green Belt assessments undertaken by LUC in Oxford in both 2017 and 2023. These assessments were based on the older methodology which focused on the level of harm (or otherwise) to the Green Belt that may result from their potential release for development, whereas the latest methodology is based on assessing the strength of the contribution that each parcel makes to each of the purposes of the Green Belt.

2.3.28 The first stage of this assessment required the Council to determine the location, scale and most appropriate parcel size as set out in Paragraph 003 (Reference ID: 64-003-20250225) of the PPG. All green sites including those in the Green Belt are already in the Council's Strategic Housing Land Availability Assessment (SHLAA), therefore it was considered that any SHLAA site which contained any Green Belt would be looked at in the first instance.

2.3.29 This resulted in an initial 101 parcels to be assessed. A filter was then applied to exclude those sites that were either entirely or nearly all within greenfield Flood Zone 3b, a Site Of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC), as these are constraints that are considered to be included under Footnote 7 of the NPPF and insurmountable to overcome. Other constraints such as Registered Parks and Gardens, Flood Zones 2 and 3a and brownfield 3b, Local Wildlife Sites or anything else that could not definitely be assumed to be included under Footnote 7 of the NPPF have NOT been used to exclude areas. This exercise resulted in 24 new parcels to be further reviewed by LUC, with 18 from the previous assessments undertaken in 2017 and 2023 to be reviewed using the new methodology assessing the strength of the contribution to each of the five purposes of the Green Belt, rather than assessing the level of harm of releasing the parcel from the Green Belt.

2.3.30 The first part of the assessment undertaken by LUC was to identify if any of the assessment parcels could be identified as grey belt. As set out in the PPG, only the strength of contribution to three of the five purposes (a, b and d) can be considered when identifying grey belt. LUC made clear in their assessment that none of the assessed parcels were identified as making any contribution to Purpose B (prevent merging of towns), therefore only the strength of contribution to purposes A (check unrestricted sprawl) and D (preserve the setting and special character of historic towns) were further analysed. Using that methodology, 12 of the 24 new parcels, and part of one other (split into two for assessment purposes) were identified as grey belt. After reviewing the 18 previously assessed parcels, 3 were identified as grey belt. Paragraph 001 (Reference ID: 64-001-20250225) of the PPG supports the position that grey belt parcels are not all developable. They were considered alongside other parts of the Green Belt, which are not

grey belt, to see if any of them warranted further consideration. Many parcels had strong reasons for protection, such as Registered Parks and Gardens, and the Core Green Infrastructure (GI) network, which included important parks such as Cutteslowe and Sunnymead. Development on these areas would undermine the spatial strategy of the plan, so these have not been taken forward for further consideration. Other sites, both grey belt and Green Belt, did merit further investigation for development potential. Issues such as access, biodiversity issues and landowner interest were checked as part of this process.

2.3.31 To summarise, a total of 42 parcels were assessed in the Green Belt assessment (2025). Of these, 24 were new parcels, whilst 18 had been previously assessed in 2017 and 2023, but using the older methodology. Of these 42 parcels, 15 and part of one other parcel were identified as grey belt.

Table 2 Summary of sites within Green Belt assessment (2025) identified as grey belt

Parcels	Grey belt
24 (new)	12 (plus part of one other)
18 (previously assessed)	3

## Public open space and open-air sports facilities

2.3.32 Public open spaces and private open-air sports facilities provide opportunities for recreation, exercise, and sport and form a key component of the wider green infrastructure network. They contribute to sustainable development by creating a green environment within the urban townscape which contributes to the character of the city and offers environmental benefits in terms of reducing surface run off and flood risk, and biodiversity. They contribute to social sustainability objectives in providing opportunities for healthy lifestyles and social/sporting activities. There are several types of open space, all of which are included within the SHLAA assessment.

### a) Public open space

2.3.33 The NPPF (paragraph 103) sets out that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.

2.3.34 In a built-up urban area like Oxford it is important to maintain access to a variety of types of open spaces. It is particularly important that as new development occurs in Oxford and the population grows, enough infrastructure is in place to offer a good quality of

life, and this includes green spaces that form the wider green infrastructure network. Net loss of public open spaces would have a detrimental effect on health and well-being, and in the City Council's view would be contrary to the NPPF. However, to ensure that the assessment is thorough, public open space sites have been included in this assessment.

**b) Private open space**

2.3.35 Private sports facilities play an important role by providing, or having the potential to provide, community access. The NPPF does not distinguish between public and private open space in meeting sporting and recreation needs of the population.

2.3.36 Landowners of private open-air sports facilities (mainly universities and schools) were contacted to confirm whether they consider any of their land to be surplus to requirements and they would wish it to be developed for housing or student accommodation or economic uses. This has resulted in various private open space sites being identified as having some potential capacity for residential use in the SHLAA.

**c) Outdoor sports**

2.3.37 Outdoor sports facilities are protected by national policy, and are also part of the wider green infrastructure network designated through LP2045 Policy G1. Generally, they are identified as 'supporting' GI spaces, unless there are identified benefits they provide which need to be retained 'in situ' which would then qualify them as 'core' spaces. The approach seeks to protect against the loss of outdoor sports facilities based on the multiple benefits they provide. However for supporting spaces, there is criteria allowing for their development where their loss can be compensated for through sufficient reprocision to the same standard or higher.

2.3.38 Many sports fields in Oxford are privately owned by university colleges or private schools but have the potential to be used by the public and to meet increased demand through a growing population through community access packages. Their loss can have a detrimental effect on the potential to make sites available to the public because once an open-air sports site is lost to development, it is highly unlikely to ever be returned to that use. Losses of these spaces can also mean losses in other functional benefits that are essential to health and wellbeing (e.g. mitigation of surface water run off, loss of space for particular species, more urbanisation of public realm).

2.3.39 The Playing Pitch and Outdoor Sport Strategy 2022-2036 categorises the provision and need in Oxford. The main conclusion from the strategy is that there is currently some shortage of playing pitch provision in Oxford, and in particular pitches that have secured community use. The strategy concludes that all existing provision within the city should be

protected but does not suggest that additional new pitches are required to meet the shortfall. The preference is to rely on securing community uses on private sites, plus planned 3G (third generation) developments. An update to the strategy is underway and this will assess provision and needs to 2045. It is expected to be published towards the end of 2026, although interim findings are being published as part of the Regulation 19 consultation.

2.3.40 The evidence continues to indicate the need to protect outdoor sports facilities. Nevertheless, sites which are allocated/protected for these uses have been included in this assessment to ensure that it is robust and thorough. Several of these sites are identified in the SHLAA as having some capacity for residential use.

*Summary: public and private open space sites, and outdoor sports facilities are included for assessment.*

## **Allotments**

2.3.41 The NPPF does not provide specific guidance on allotments but recognises their importance to enabling and supporting healthy lifestyles (paragraph 96). In Oxford, allotments contribute to the social sustainability of places by creating healthy, inclusive communities and provide a variety of multi-functional benefits beyond providing space for food growing (e.g. spaces for biodiversity, climate resilience, for mental and physical health).

2.3.42 Allotments are particularly valuable in areas where access to private gardens are lacking, and Oxford, being a very compact city, has many properties with very small or no gardens. The majority of the allotment sites in Oxford continue to have waiting lists which illustrate the high demand which exists. They are also typically well-located in areas that are easy to access without reliance on private vehicles, although the GI study identified that there are deficits in access in places.

2.3.43 For the reasoning above, allotments are considered important to protect as losses would not be easily mitigated through reprovision and could have significant negative impacts upon the local community. Allowing losses could exacerbate existing deficits in access, particularly when considering additional housing and population growth too. They therefore form a key part of the ‘core’ green infrastructure network, which is considered to be consistent with the NPPF. Nonetheless, the sites have not been excluded from the assessment to ensure that it is robust and thorough.

*Summary: allotment sites are included for assessment.*

## Town greens

2.3.44 Registered Town Greens have statutory protection against development by Section 12 of the Inclosure Act 1857 which makes it a criminal act to undertake any act which interrupts the use or enjoyment of a green as a place of exercise and recreation. Section 29 of the Commons Act 1876 makes it a public nuisance to exclude people from that area. Town Greens will therefore be excluded from assessment and are only assessed if they have been proposed through the call for sites or consultation in order to be transparent.

*Summary: town green sites are excluded from the assessment unless specifically identified through call for sites or consultation.*

## 2.4 Stage 2: Site assessment

### Suitability

2.4.1 The Guidance<sup>5</sup> sets out the following considerations for assessing a site's suitability for development:

- National policy
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Potential impacts including effect upon landscape features, nature and heritage conservation.

2.4.2 All sites identified as part of the SHLAA have been assessed against the above factors to give an indication of each site's potential suitability for development (housing or economic).

2.4.3 In terms of market attractiveness, this assessment has taken the broad view that whilst some areas of Oxford are more attractive to developers than others, the whole of Oxford exhibits very high demand for housing and employment and that no site should be rejected on this basis.

### Availability

2.4.4 The Guidance<sup>6</sup> considers a site to be 'available' for development when, on the best information available (confirmed by the call for sites and information from landowners where appropriate), there is confidence that there are no legal or ownership impediments

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<sup>5</sup> Paragraph: 018 Reference ID: 3-018-20190722

<sup>6</sup> Paragraph: 019 Reference ID: 3-019-20190722

to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

2.4.5 The conclusions about site availability were informed by a range of sources, for example through planning applications or informal pre- application discussions, through contact with landowners to confirm their intentions, and the Calls for Sites. Where a site was assessed as generally suitable for residential development but where there had been no recent engagement with landowners via the planning process then they were contacted to check the intentions. Where only part of a site is available then it is noted in the assessment table (Table A) such as for a mixed-use site, and the estimated capacity / dwellings figures (Table B) were adjusted to reflect that.

### Achievability

2.4.6 In the Guidance<sup>7</sup>, a site is considered achievable where there is a reasonable prospect that the particular type of development will be developed on that site over a certain period. It is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

2.4.7 As with the approach for suitability and availability described above, where a site has either an extant planning permission (ie the landowner has within the last 3 years deemed the site to be viable to develop) or they have confirmed their intention to develop the site through engagement in the LP2045 process, then it has been assumed that the landowner deems the site to be viable for development and there is a reasonable prospect that the site will be developed.

2.4.8 For remaining sites, the typologies assessment from the LP2045 Viability Study has been used, which takes a sample of sites of different sizes from various locations across the city. Individual viability assessments for residential development on each site have not been carried out as existing evidence demonstrates that the majority of sites in Oxford City are viable, and for those where the landowner can demonstrate unviability, the Council can be flexible in applying Affordable Housing requirements to allow a site to become viable. Whilst most types of sites and locations have good viability in Oxford, the recent high values for R&D do provide landowners with a higher viability incentive than conversion to alternative uses, which is reflected in the Availability conclusions where the landowner has indicated they wish to redevelop only for commercial uses.

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<sup>7</sup> Paragraph: 020 Reference ID: 3-020-20190722

## Overcoming barriers to delivery

2.4.9 For sites considered Suitable, Available and Achievable, the next level of assessment considers the potential type, quantity, and timescales of development, which also helps to review potential barriers to delivery and how they could be overcome.

2.4.10 The information gathered as part of the SHLAA, such as in the call for sites submissions, includes information to identify potential barriers to delivery that would need to be overcome, such as land contamination that would need to be remediated, and that may affect viability. If there are such barriers, these are noted. However, the typically small nature of sites in Oxford means that there are rarely circumstances that mean significant delay such as significant pieces of infrastructure or other works need to be delivered to enable them.

## Development potential

2.4.11 Information on suitability, availability, achievability and constraints can be used to help inform an estimate of the capacity and timescale within which each site is likely to be capable of development. The Guidance<sup>8</sup> states that the development potential can also be guided by existing or emerging plan policies including locally determined policies on density and should also seek to make efficient use of land in line with the NPPF.

2.4.12 For those sites in Table B which have a site allocation in LP2045, bespoke site-specific analysis has been undertaken as part of the evidence for the site allocation. This therefore provides the most accurate and up to date information to inform the capacity assumptions in the SHLAA. This applies to a large proportion of sites in Table B. Of the remaining, where there is an extant planning permission then the residential capacity from the permission has been applied. Only where there is no site allocation nor planning permission, does the SHLAA then revert to density typologies to inform the capacity assumption for Table B.

### a) Bespoke site-specific capacities

2.4.13 For sites allocated in LP2045, the number of dwellings in the policy has been taken as the indicative capacity. The site allocation residential requirements numbers were informed by site-specific capacity assessments, which considered site constraints and opportunities in detail to ensure the assumptions are based on the most up to date evidence for each site. The Sites Background Paper LP2045 explains this in more detail.

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<sup>8</sup> Paragraph: 016 Reference ID: 3-016-20190722

The work to inform the site allocations has also included engaging with landowners about their expectations from the site.

2.4.14 For sites without an allocation but where there is an extant planning permission in place then the capacity figure has been taken from the planning permission, as this figure is specific to the site and has been tested through the development management process.

2.4.15 A small number of sites in Table B are listed with a capacity of zero. Some of those are hospital sites with a site allocation supporting residential development, but the primary use remains the hospital use, and the health trust does not yet have firm enough plans to specify a capacity that could be accommodated alongside the primary operational hospital uses for the site. Others with a zero in Table B are because the site allocation policy represents a group of several SHLAA sites that a landowner is intending to develop collectively. Those site allocation policies do not set out a split for the residential numbers across the sites because the landowner proposals are not sufficiently advanced at this stage, and in theory the residential requirement could be delivered in various combinations across that collection of sites depending on the final development proposals, for example the three “Nuffield Sites”. In those instances, the SHLAA apportions the entire residential number against one of the sites and correspondingly has zero against the other sites that fall within that site allocation area to avoid double counting and to reflect that the policy is flexible about the location of residential across those grouped sites.

### **b) Density**

2.4.16 Density is another important factor in calculating capacity. As explained above, in the majority of instances the density is assessed via the site allocations process or is already established via planning permission. Only for sites which do not have a site allocation or a planning permission, then a density typology approach was applied to estimate capacity in Table B.

2.4.17 The typologies reflect the density assumptions in LP2045, seeking to make the most efficient use of land (Policy HD2). The approach is based on three typologies of development and takes into account NPPF guidance about efficient use of land (NPPF para 124-5). These typologies are representative of the Oxford context – both in terms of the physical features of the city and in terms of the constraints, pressures, needs, and aspirations of the city. In conservation areas that are former rural settlements characterised by low-density development, an appropriate lower density has been assumed.

Table 3 Indicative density typologies for LP2045

<b>Development typology</b>	<b>Indicative density</b>
City centre, district centres	100dph
Gateway sites	80dph
Suburban	60dph

2.4.18 These density assumptions are for the purpose of estimating housing capacity numbers in the bespoke site capacity assessments for LP2045 and the SHLAA. These bandings are not proposed to be used as guides for development in Oxford, although they have been developed bearing in mind the characteristics of Oxford and the ambitions of the Local Plan for future development.

2.4.19 For residential developments which fall outside of the C3 self-contained use class, such as student accommodation, communal accommodation, and care homes, a ratio must be applied to the number of rooms to calculate the “C3 equivalent” figure so that all sites are being assessed on a comparable basis. The ratios applied are set out in the latest Housing Delivery Test measurement rule book<sup>9</sup> as follows:

Table 4 Housing Delivery Test ratios applied

<b>Type of home</b>	<b>Housing Delivery Test (2024) ratio</b>
Student accommodation	2.4
Other communal accommodation and care homes	1.9

### **c) Delivery timescales**

2.4.20 In accordance with the Guidance, each site in Table B has been assigned an indicative timescale for delivery which is either 1-5 years, 6-10 years, 11-15 years, or 16 years or beyond from the base date of the SHLAA and LP2045, which is 2025.

2.4.21 The processes and evidence to undertake a SHLAA, demonstrate a Housing Land Supply, and meet the Housing Delivery Test, are closely linked. Therefore, to be consistent with the NPPF guidance (para 72) and Housing Land Supply Guidance<sup>10</sup> about identifying land for housing, sites are ‘deliverable’ if there is clear evidence that housing completions will begin on site within five years. The rest are ‘developable’ and are assigned delivery years in the subsequent 6-10 years, 11-15, or 16+ years timescales.

<sup>9</sup> <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>

<sup>10</sup> <https://www.gov.uk/guidance/housing-supply-and-delivery>

2.4.22 The Housing Land Supply Guidance sets out criteria to define ‘deliverable’ sites, ie those likely to be delivered within the first five years, as sites which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

2.4.23 As such, sites in the SHLAA have only been assigned to delivery years 1-5 if they meet one of these criteria. Other sites in Table B, such as site allocations without permission yet, are assigned later delivery phases based on engagement with landowners and how advanced their proposals for the site are, as well as other information known about each site in relation to its suitability and availability for housing or economic use.

2.4.24 There are some phased sites which delivered part of their capacity prior to 2025 ie before the start of the plan period. This is shown in Table B to explain how the overall capacity of the site is being met, however any completions prior to 01.04.2025 are not being counted in the capacity figure identified in the SHLAA because that is before the Plan base date of 2025, hence those numbers are clearly indicated in a separate column in Table B.

## 2.5 Site assessment summary

2.5.1 This section summarises the results of the SHLAA assessments in Tables A & B.

2.5.2 Table A lists all sites which have been considered and sets out the results of the assessment in terms of the judgement on the suitability, availability, and achievability of each site for housing and/or economic use. Table B includes only those sites which are suitable, available, and achievable, and sets out the development potential of each site and the timescales for delivery. Full details of the individual site assessment results can be found in Tables A and B.

- Maps 1-3 (see Appendix) show all sites identified for assessment (all those listed in Table A).
- Maps 3-6 (see Appendix) show those sites accepted as having potential for housing or mixed use (all those listed in Table B).

2.5.3 Sites that are expected to come forward with an economic element have not been listed in Table B nor have they explicitly been assigned to a timescale, because this analysis is covered in more detail in the ELNA so it is not repeated here in the SHLAA. The Employment Land Needs Assessment considers the current stock of employment land in

Oxford and should be referred to for more detail about employment sites capacities, or where applicable updated information in the ELNA. For mixed use proposals where it is expected that the employment floorspace would be delivered in parallel with housing and other uses the residential capacity is included in Table B, for the economic capacity see the ELNA. For more information about the assessment of employment sites, see the ELNA.

## 2.6 Overall capacity calculations for LP2045

2.6.1 This section explains the component parts of the overall capacity calculations and sets out the final calculations.

### **10% non-implementation discount for non-delivery**

2.6.2 A 10% non-implementation discount is applied in the SHLAA calculation of overall capacity, to account for the risk of non-implementation of sites. This is only applied to sites identified in Table B of the SHLAA that have yet to commence. The discount has not been applied to the windfall calculations, to minor commitments, or to sites that are either currently under construction or have already completed within the plan period.

2.6.3 The reasons for the discount reflect the nature of the supply of sites in Oxford, and are important to ensure that the capacity-derived housing requirement figure is robust, realistic and reflects local circumstances.

2.6.4 Without a buffer, would be to assume that every single site identified in Table B will come forward, and at the assumed timescale. Care has been taken to understand landowner intentions regarding developing their sites and to ensure this understanding is as up to date as possible. However, inevitably, there are a lot of unpredictable factors that could undermine delivery of sites. These are particularly heightened in the context of Oxford, something which was recognised during the preparation and examination of the previous Local Plan 2036. It is not considered a sensible or sound approach to ignore that and put forward a capacity that relies on every identified site being delivered and to time.

2.6.5 Factors in Oxford which may lead to lower rates of delivery of sites include: changes in financial and market conditions, generally or of a particular landowner; changes in a landowner's priorities or needs; lack of alternative sites to meet operational needs; or unforeseen difficulties with bringing forward a site.

2.6.6 The profile of sites in Oxford is that many development sites are small; therefore, relative to the plan period's overall capacity, there are many sites needed to achieve the identified capacity. The indications are that for smaller sites, the rewards are less likely to match the time and effort needed to bring them forward, so there may be greater risk of them not being delivered (compared to larger sites), meaning there is potentially greater

risk of the factors described above affecting site delivery in Oxford. For example, there is less flexibility in budgets to respond to unexpected costs or changed site circumstances.

2.6.7 We also know from engaging with landowners, that many of the key landowners in Oxford have clear priorities other than delivering sites for housing. For example, it is anticipated that housing will be brought forward on hospital sites during the plan period, but the priority of the Health Trusts will always remain in their key health care functions.

2.6.8 Another locally specific factor is the competing market demands for sites in Oxford, which means that residential use is not always the most attractive option for landowners in terms of viability. This is particularly evident in recent years where values for R&D space have outstripped residential values, which may be a factor in some landowners now saying they no longer intend to develop those sites for residential in OLP2045, even those with previous site allocations in OLP2036. The Local Plan must also factor in a response to this position of the market and set of circumstances.

2.6.9 There are also sites where availability is subject to an alternative site for the current uses being found, with quite specific operational requirements. So, in the context of a general lack of land availability in Oxford, it means that releasing the site for residential development is even more challenging. Those sites, for example, Cowley Marsh Depot are included in Table B to reflect that there is landowner intention but with delivery assumed as right at the end of the plan period to reflect the complexity and challenges of finding alternative sites for those uses.

2.6.10 As demonstrated above, this somewhat unique to Oxford combination of reasons means that it is appropriate, proportionate and reasonable to apply a discount for non-implementation of sites in the SHLAA, to reflect those uncertainties, challenges to delivery, and in recognition that some sites identified in Table B may not be delivered within the plan period.

2.6.11 An additional factor is that those same characteristics of Oxford contribute to having a fairly high contribution of windfall sites (elsewhere in the SHLAA) which are accounted for in the capacity calculations for the plan. However, all of these elements of the land supply in Oxford are interrelated, so it is important to look at the whole picture.

2.6.12 The non-implementation discount is set to 10%, which reflects the assumptions applied in the OLP2036 and tested at previous Local Plan examination. The evidence indicates that the approach remains relevant and proportionate in a constrained city with a capacity-based housing requirement, as established at the Examination for LP2036 in 2019/20. It should also be noted that the non-implementation discount has a different purpose and meaning to the buffer that is applied in housing land supply calculations; the

two considerations do not have the same function and neither do they need to necessarily be set at the same percentage value. The discount on the capacity calculations is to ensure that the housing requirement figure is actually achievable. Whereas the buffers described in the Guidance for Housing Land Supply<sup>11</sup>, that all authorities are required to apply to calculations, are to promote choice and competition, and to ensure that there is a reasonable prospect of achieving the planning housing supply.

### Windfall assessment in the capacity calculations

2.6.13 Windfall sites are sites which have not been specifically identified in the development plan, which have unexpectedly become available, or have not been identified or put forward by the landowner because they are too small (less than 10 dwellings).

2.6.14 The role of a windfall assumption in a SHLAA capacity calculation is to provide an allowance for sites which contribute to future housing supply through an analysis of past trends. The NPPF (para 75) and Guidance<sup>12</sup> states that a windfall allowance may be justified as part of anticipated supply if a local planning authority has compelling evidence.

#### a) Small windfall sites (1-9 dwellings)

2.6.15 The urban nature of Oxford and high proportion of brownfield sites, means typically there is typically a number of small windfall sites delivering between 1-9 dwellings each year, such as conversions to residential and infill developments. Using past trends and extrapolating forward means that there is evidence and certainty that this source of supply has consistently – with some annual fluctuations - come forward and are likely to continue over the local plan period.

2.6.16 For the purposes of calculating a small sites windfall assumption, sites included as windfall are those of 1-9 units. In Oxford, most of these sites come from the following categories: subdivision of existing housing, flats over shops, intensification of sites, redevelopment of existing housing, development of derelict land/buildings on brownfield land and conversion of commercial land to housing including permitted developments office to residential. Historically development on garden land was excluded from windfall calculations but since the 2021 NPPF update housing on garden land is not prevented by policy. Therefore, it is included within the totals. Completions from B56 Prior Approval sites (office/retail to residential conversions) of 1-9 units are also included within these figures.

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<sup>11</sup> <https://www.gov.uk/guidance/housing-supply-and-delivery> Paragraph: 013 Reference ID: 68-023-20241212

<sup>12</sup> Paragraph: 023 Reference ID: 3-023-20190722

2.6.17 The table below shows that windfalls on sites of 1-9 units have provided a consistent source of housing in Oxford. The windfall calculation is based on the previous nine years of small sites completions data, from 2016/17, the start of the Local Plan 2036. These small sites' completions figures include completions from C2 (student accommodation or care homes) developments where the C3 equivalent residential number is 1-9 units, and also developments with B56 prior approvals where the number of units is 1-9.

2.6.18 The windfall assumption is calculated from simply taking the average number of completions from minor sites (sites 1-9 dwellings) over recent years. The average annual windfall figure, based on completions 2016/17 to 2024/25, is 112 dwellings per annum.

2.6.19 There is, as would be expected, some fluctuation from year to year, which is why an average across the years is taken. The annual completions vary from as high as 258 to as low as 50dpa, but these are very much outlier, with a more common annual windfall amount being closer to the 112 average calculation.

Table 5 Summary of minor windfall calculation

<b>Completion year</b>	<b>No. Dwellings from small windfall sites (0-9)</b>
16/17	258
17/18	50
18/19	101
19/20	83
20/21	61
21/22	158
22/23	84
23/24	154
24/25	61
Total	1010
Average over 9 yrs = 112dpa windfall	

2.6.20 A further test is to see how the windfall assumption aligns with the minor commitments figures, as an indication of the level of small sites expected to be delivered in the early part of the plan period. At the time of calculating the windfall, the total minor commitments for the first three years 2025/26 - 2027/28 is 233 (total, not per year). As such, the windfall assumption of 112dpa is not unreasonable.

2.6.21 Analysis about the types of sites and developments which make up the small sites completions has also been undertaken, in order to test whether it is reasonable to assume that the averaged figure is likely to continue to be delivered going forwards through the plan

period. The testing also takes into account policy changes which might influence the supply of small sites/windfall developments, or whether there has been any marked change in small sites coming forward in response to past policy changes. For example, known changes to permitted development rights and change of use legislation, such as office to residential (B56 applications).

2.6.22 The windfall assumption is applied in the capacity calculations for years 2028/29 onwards (i.e. for 17 of the 20-year plan period). Windfall is not applicable to years 2025/26-2027/28 because the number of dwellings confirmed in minor commitments figure is applied in those years using planning permissions data (rather than applying an estimated windfall assumption,) because the permissions data is more accurate than an assumption.

**b) Windfall from majors**

2.6.23 Since the 2023 SHLAA further analysis has also been undertaken to review whether an assumption should be made about windfall from major sites of 10+ net gain. This was partly in response to suggestions that the B56 permitted developments could have a significant impact on supply of homes and overall capacity for the plan period.

2.6.24 As such, a similar data analysis exercise was undertaken to review completions of major sites back to 2016/17, to review which ones were 'windfall', i.e. not identified site allocations or identified as part of local plan capacity calculations, and whether there was compelling evidence that an allowance should be added to the capacity calculation.

2.6.25 The table below shows that windfalls on sites of 10+ units have provided a variable, but nonetheless not insignificant, source of housing in Oxford over the last nine years. Given this clear evidence, and the need to consider all reasonable approaches to maximise the housing capacity assumption for Oxford, it is considered justified to make an assumption for windfall from larger sites. As such, a majors windfall allowance of 57dpa has been included in the capacity calculations. It has been applied on the same basis as the minor windfall allowance for years 2028/29 onwards (i.e. for 17 of the 20-year plan period). A large proportion of these sites were for student accommodation on campus sites (hence there is limited incentive for the landowner to seek a site allocation or submit the site for a SHLAA), and others were simply opportunities that arose from businesses ceasing trading such as a former service station and former pub.

Table 6 Summary of major windfall calculation

<b>Completion year</b>	<b>No. Dwellings from major windfall sites (10+)</b>
16/17	40
17/18	0

18/19	0
19/20	60
20/21	66
21/22	145
22/23	127
23/24	71
24/25	0
Total	509 Average over 9 yrs = 57dpa windfall

2.6.26 Both of the windfall assumptions are regularly updated, to reflect annual completions data updates. The allowance for major windfall sites in particular will need to be reviewed through the plan period (and capacity calculations adjusted accordingly) because the SHLAA (2026) assessment includes many more sites than ever before, thus potentially reducing the likelihood of there being unidentified majors windfalls to the same extent in future years, although housing delivery is expected to remain complex and unpredictable in Oxford, and the factors that make it so will remain, such as significant demand for many uses and significant public sector ownership.

#### **Conclusion on windfall allowance in SHLAA capacity calculation**

2.6.27 Based on the analysis of past completion rates in Oxford, the annual windfall allowance to be included in this SHLAA is 112 units per annum for small sites, and 57dpa for major sites.

2.6.28 This is justified because the data shows an ongoing significant contribution of windfall to the housing supply across all wards. There is no expectation that this trend would change during the plan period and therefore Oxford City Council are confident that this is a windfall source that will continue and should be included in the SHLAA capacity calculation for the plan period 2025-2045. The windfall figures coming forward will be closely monitored and if they fall short of or exceed the estimates provided in this SHLAA, they will be revised in future land assessments.

### **2.7 Summary of total capacity calculations for plan period 2025-2045**

2.7.1 This SHLAA assesses over 500 sites.

2.7.2 The housing capacity from sites identified as Suitable, Available and Achievable and capable of delivering 10+ net dwellings is 6,657 (Table B identified capacity 2025-2045). A 10% discount is then applied to this figure as a buffer to account for potential non-delivery of identified sites: This is a proportionate approach in a constrained city with a capacity-

based housing requirement, as explained above. In future SHLAA updates Table B will also include sites which have been completed since the plan start date 01.03.2025 but as this SHLAA falls within the first monitoring year then the completions are currently reported as 0 and those sites are captured as identified large sites.

2.7.3 In addition there is an estimated contribution to the housing supply from minor commitments (small sites <10 dwellings, with planning permission) of 233, and from windfall (minors and majors) sources of 169 dwellings per year (2028/29 to 2045) to the SHLAA supply calculations.

2.7.4 The total housing supply identified is therefore 9,267 dwellings for the Local Plan period 2025-2045 (including a 10% buffer to applicable sites).

Table 7 Summary of capacity calculations 2025-2045

Completions within the plan period (currently 0 because 2025 start date)	0
SHLAA Table B identified sites (major commitments, draft site allocations, including 10% non-impl buffer on non-commenced sites)	6,161
Minor commitments total (2025/26, 26/27, 27/28)	233
Windfall from minors (112dpa for 17 years)	1904
Windfall from majors (57dpa for 17 yrs)	969
<b>Total capacity 2025-2045 (rounded)</b>	<b>9,267</b>

2.7.5 The SHLAA figures above provide a snapshot in time representing the situation under the current national policy approach, and the current information available about site constraints, landowner intentions and site viability. The SHLAA does not allocate housing sites and does not replace the normal Local Plan making or planning application process.

2.7.6 Table B also sets out approximate delivery timescales for the identified capacity, in five-year timescales. A more detailed trajectory showing annualised expected rates of delivery is also provided below and in Policy H1.



*Figure 2 Forecast supply against LP2045 annual requirement*

2.7.7 It is normal for annual rates of delivery to fluctuate in Oxford because of the nature of sites making up the housing land supply, as explained earlier in this SHLAA, and as illustrated in monitoring data which shows previous years' completions rates varying. The projected supply reflects the nature of sites in Oxford, with many small sites making up the supply then landowners typically either do not look that far ahead, or sites are opportunistic and are not known about at this point 10-15 years ahead. Also, the land supply market in Oxford varies with R&D values currently greater than residential values, but historically it has been residential and student accommodation achieving the greatest values. Closer to the time, more up to date information would be available from landowners, planning permissions in place, and site allocations in future local plans, which will all improve the housing land supply situation for those latter years.

### 3. Conclusion

3.1 This SHLAA has assessed all sites with potential for housing or economic use over the Local Plan period. It fulfills the requirements as set out in NPPF and associated Planning Practice Guidance for the assessment, namely to:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.2 Appendix A lists all sites assessed as part of the SHLAA with a conclusion about the suitability and availability of each site in terms of potential development for housing. For sites which have been assessed as suitable and available, an indication of the number of dwellings achievable on each site is shown and the expected timescale for delivery in Appendix B.

3.3 The SHLAA has set out a trajectory of deliverable and developable housing and economic sites that are expected to come forward over the plan period.

3.4 The SHLAA figures represent the situation under the current national policy approach, and the current information available about the sites, viability, and ownership. The SHLAA does not allocate housing sites and does not replace the normal Local Plan making or planning application process.

#### **Consideration of risk**

Commensurate with pressing need for housing in Oxford, this SHLAA has taken a rigorous approach to identify all development potential and there has been ambitious presumptions that sites can be delivered even where there are significant constraints identified, in an attempt to leave no stone unturned and be as thorough as possible, and maximise the capacity that can be identified in this assessment.

This however carries a risk that some of the capacity identified will not be delivered. The assessment of sites in the SHLAA is a combination of evidence and judgement, and it is probable that some sites will not come forward as expected due to unforeseen circumstances (such as economic conditions and site-specific circumstances), while other sites may come forward that had not been foreseen. in response to this, the 10% buffer has been applied to reflect some of this uncertainty.

## Appendices

Maps of all sites assessed

Maps of sites with development potential

Table A – All sites assessed

Table B – Sites with development potential

Table C – Sites with development potential but capacity less than 10