

Background Paper 015 - Developing Local Plan 2045 Site Allocations

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Introduction

- 1.1 This background paper forms part of the evidence base for the Oxford Local Plan 2045 (LP2045) to explain the process undertaken for developing the site allocations.
- 1.2 In order to guide the right type and level of development to the optimal location, whilst fully considering the city's constraints, the Plan contains site allocation policies and areas of focus policies. Site allocations are policies specific to a site and set out the types of land use, or mix of uses, which would be acceptable on that site, or protects the site for certain types of development in line with the overall plan strategy. Areas of focus are defined but are broader areas anticipated to experience change as a result of new development (in some cases including development across the city boundary) during the Plan period. The policy for each area of focus sets out key development principles specific to that area.
- 1.3 This background paper explains the stages of assessment and filtering, and how different stages of assessment have led to the final list of site allocations in the Regulation 19 version of LP2045 (Submission Draft Oxford Local Plan 2045). More information can also be found in the Sustainability Appraisal (SA) for LP2045 which explains how SA has also informed this process. As with previous Local Plans undertaken for Oxford, the SA process has been integrated into this site assessment/refinement process. This helps to ensure that sustainability considerations are intrinsic to developing site allocations. Also of relevance are the Employment Background Papers (BGP.004 and BGP.004a) which explain how Key Employment Sites have been assessed. This background paper does not cover the designation of Key Employment Sites, it only covers sites with site allocations (whether for residential, mixed use, or for employment).
- 1.4 This Background Paper cross-references site assessments in the Strategic Housing Land Availability (SHLAA, 2026) but for conciseness does not repeat the assessment which is already undertaken in the SHLAA.
- 1.5 The first part of this paper explains how the sites were identified and assessed to arrive at the first shortlist of sites which would be taken forward for further investigation (including SA) and for inclusion in the Regulation 18 "Preferred Options" stage consultation version of LP2045. This is summarised in **Appendix 1** (sites not taken forward to Regulation 18) and **Appendix 2** (sites proposed for allocations in Reg 18 consultation).
- 1.6 The paper then explains how the shortlist of sites from the Regulation 18 stage was refined and the additional testing undertaken, to arrive at the final list of sites for the 53 proposed site allocations at Regulation 19 stage "Proposed Submission". This included further iteration of SA, testing with landowners, and additional technical

evidence studies such as Strategic Flood Risk Assessment (SFRA, 2026) and Green Belt assessment (2025). At this stage, some new sites were also added into the assessment process (for example, those submitted by landowners during or following the Regulation 18 consultation), and some were rejected if new or updated evidence had become available. This is summarised in **Appendix 3** (how sites were assessed after Regulation 18) and **Appendix 4** (final list of site allocations for Regulation 19).

1.7 The paper is supported by four Appendices:

- **Appendix 1** sets out those sites rejected at the first stage of filtering.
- **Appendix 2** sets out the sites shortlisted for allocations at the Preferred Options stage and presented in the consultation document (Regulation 18).
- **Appendix 3** sets out the sites from the Regulation 18 consultation document, plus commentary on any updates following the consultation and whether or not the site is being taken forward to Regulation 19. It also shows new sites which were added to the process after Regulation 18, e.g. through landowner submissions during or after the consultation period.
- **Appendix 4** sets out the final list of 53 site allocations proposed at Regulation 19, the vast majority of which are allocated for housing development.

First stage of assessment, to inform Preferred Options

Identifying potential development sites

2.1 An initial large pool of potential sites for development was identified at the start of preparing the Plan. Over 500 sites across Oxford were identified in the SHLAA. This includes sites being assessed for their potential for residential, mixed use, or employment uses.

2.2 As explained in the introduction, the assessment and identification of employment sites which are proposed for Key Employment Site designations, is a separate process which is explained in the Employment Background Papers (BGP.004 and 4a). This Sites Background Paper only covers the employment sites that required consideration as potential site allocations, such as those likely to experience a significant scale of development in the plan period, or with particularly complex delivery challenges or constraints.

2.3 As described in the SHLAA methodology section, sites were identified from the following sources:

- Sites from the previous Strategic Housing Land Availability Assessment (Housing and Economic Land Availability Assessment (HELAA), 2023);
- Several Calls for Sites asking people to nominate sites;

- Sites that were already subject to the plan making process e.g. allocated sites in LP2036 and omission sites from the LP2040 examination;
- Sites with extant permission or a resolution to grant planning permission since the 2023 HELAA;
- Sites with a planning application pending determination or at pre-application stage (with agreement from the applicant);
- Sites identified in the Employment Land Needs Assessment (ELNA) as having potential for additional employment or housing;
- City Council owned sites;
- Brownfield Register.

2.4 The sites identified from this search, are all listed in SHLAA Table A – All Sites Assessed, and illustrated on the corresponding SHLAA maps.

2.5 Alongside undertaking the SHLAA, the Council also reviewed employment land needs and assessed employment sites as part of its ELNA (2026). This helped to identify sites to be allocated for protection for employment development, as well as to understand which existing employment uses should be protected through employment-related policies, and which employment sites could help deliver some homes. The study helped to inform the conclusions in the SHLAA, and subsequently the decisions about sites being considered for site allocations.

Assessment of intrinsic and other fundamental constraints

2.6 A three-stage process was then followed to identify which potential sites were, on the basis of the emerging evidence at that stage in the plan-making process, considered to be reasonable and deliverable. Those assessed as reasonable and deliverable were presented as proposed site allocation policies for consultation at Regulation 18 and further testing.

2.7 **Stage 1** Assessment: The first test applied to potential sites was whether there were any intrinsic or other fundamental constraints, such as clear conflicts with national policy and/or insurmountable environmental or physical constraints, and deliverability considerations.

Stage 2 Assessment: Test against the Sustainability Appraisal objectives

→ Regulation 18 consultation

Stage 3 Assessment: Further testing constraints and deliverability

→ Regulation 19

Stage 1 Assessment – intrinsic constraints

2.8 The initial basic test for all potential site allocations, was whether there were any clear conflicts with national policy and/or insurmountable environmental or physical

constraints. For example, the presence of insurmountable environmental constraints such as national ecological designations (e.g. the SAC and SSSIs), or undeveloped land within the flood plain (greenfield flood zone 3b).

2.9 These types of intrinsic constraints cannot be overcome and sites with the following constraints were not taken any further forward in the assessment process:

- A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI);
- Greenfield in flood zone 3b;
- Already at an advanced stage in the planning process (i.e. development has commenced or recently been completed before the plan period start date 01.04.25).

Stage 1 Assessment – deliverability

2.10 Some sites were physically too small, or did not have capacity due to existing uses on the site, to deliver a net gain of 10+ dwellings (for residential or mixed-use sites). Sites which did not meet this threshold were judged as not warranting a specific allocation in the Local Plan, and are assumed to come forward as small scale windfall sites, without needing a specific site allocation to ensure their delivery. The site size threshold is explained in more detail in the SHLAA Methodology.

2.11 Sites were not considered appropriate for a site allocation if there was not robust evidence that they were deliverable during the plan period. This might be if they were not going to be made available by the landowner during the plan period, or if a landowner is not committed to bringing forward the site for development for residential uses. Or if there was serious conflict with NPPF or LP2045 Strategy and no mitigation was possible. Sites could not be assumed to be deliverable where:

- It was extremely unlikely to become available during the plan period e.g. due to existing uses
- The landowner has no intention to develop for residential
- Serious conflicts with NPPF or LP2045 with no mitigation possible, such as “Core” Green Infrastructure, or unresolvable highways constraints.

2.12 Sites that were assessed and rejected at the Stage 1 assessment are listed in **Appendix 1**. Further details about these sites are available in SHLAA Table A – All sites assessed.

Stage 2 Assessment

2.13 All sites that passed the Stage 1 filter process were considered to be broadly deliverable, that is, they do not have insurmountable barriers to delivery. These were then subject to more in-depth appraisal using the SA Framework including an individual site assessment.

2.14 The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in a deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure.

2.15 The SA process helps to identify potential sustainability impacts that could arise from taking forward an allocation. The scoring indicates where development on a potential site could positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

2.16 For the site allocations proposed at Regulation 18 stage, an interim SA appraisal was published for each site. As policies had not been drafted for the sites at that stage, the scoring completed was subject to further work in places (e.g. the sites were scored as 'depends upon implementation' against a number of criteria). For more information about the SA see the Site Assessment section of the SA (section 5.3). The individual site assessments can be found in Appendix C of the SA. For sites carried forward to Regulation 19, the SA site assessments have subsequently been reviewed and updated to reflect the more-specific policy wording of the allocations and/or where new or updated information was available.

2.17 At this stage in the assessment process, individual meetings were also held with landowners/site promoters to check their latest aspirations for sites that were either existing LP2036 site allocations or had been identified more recently (e.g. as part of LP2040) as potential allocations. These meetings helped inform the shortlist of sites, proposed uses, and to check again if there were any further sites to add into the assessment.

Regulation 18 consultation

2.18 The sites that were considered to have potential as deliverable site allocations after these stages of assessment, were presented in the Regulation 18 consultation document (Preferred Options) for comment. The shortlist of sites at that stage is set out in **Appendix 2**.

Stage 3 Assessment – refinement of site allocations shortlist, following Regulation 18 consultation

2.19 Following the Regulation 18 consultation, the sites from the Preferred Options document were subject to further and more in-depth assessment and refinement to inform the detail of their allocation. This more in-depth assessment of the sites took into account: responses from the consultation (including any new or amended sites submitted); updates to the evidence base (including more advanced evidence base studies, and changes to the planning status of sites); and further engagement with landowners and with statutory bodies.

2.20 This additional work was often iterative and sometimes resulted in adjustments to the site allocations when compared with what was consulted on at Regulation 18, for example red lines being adjusted, sites being combined, and names being adjusted. It also helped to inform key principles for the site allocation policy and potential mitigation requirements being identified, and to calculate a bespoke site-specific residential capacity expected from the site (rather than using a general density multiplier).

2.21 The refinement process is summarised in individual Site Capacity Assessments for each site being proposed for residential or mixed-use allocations, and also in SHLAA Table B – Sites with Development Potential. For sites being proposed for employment allocations, the individual Site Capacity Assessment template was also used but the section on site capacity was not applicable. For further detail about the considerations for individual sites, see the Site Capacity Assessments which are also being published as part of the evidence base for LP2045.

2.22 Further additional targeted engagement with landowners and relevant statutory bodies was also undertaken (subsequent to the Regulation 18 consultation) as the draft site allocations evolved, to ensure that assumptions about site delivery were up to date.

2.23 In addition, in Autumn 2025, the time period of the Plan was reviewed and was adjusted from 2022-2042 to 2025-2045. In response to this, some of the evidence base which had informed site allocations needed to be refreshed to reflect the new timescales, and an additional Call for Sites was also undertaken (October 2025). Landowners of site allocations were also contacted to see if they had any additional sites to put forward for the revised time period. The Green Belt Assessment had also at this point reached a stage where Green Belt and Grey Belt sites could be identified for assessment as potential site allocations. These workstreams resulted in some new sites being introduced to the assessment process. These new sites were put through the same process described in stages 1 & 2 above, to filter them for their appropriateness for allocation. This testing is explained in more detail in the Green Belt Background Paper (BGP.006) and Green Belt Assessments (June 2025 and December 2025).

2.24 **Appendix 3** summarises the results of the stage 3 assessment.

- It explains the adjustments made to site allocations proposed at Regulation 18, including combining sites and changes to red line boundaries.
- It explains which of those from Regulation 18 were not ultimately taken forward as allocations and the reasons why. Some of these were due to changes in landowner circumstances, and some were due to updated constraints evidence becoming available such as Strategic Flood Risk Assessment Level 2 and Green Infrastructure Assessment.
- It explains new sites added to the assessment.

2.25 The result of this third stage of testing, is that 53 sites are included in the Regulation 19 document as site allocations. These are listed in **Appendix 4**, and the residential / mixed use site allocations are also listed in the SHLAA Table B.

Conclusion

- 3.1. The site assessment process for identifying site allocations in LP2045 has been thorough, proportionate and robust.
- 3.2. It is important to note however that site allocations are only one source of housing capacity in LP2045. In addition to those sites identified as allocations for residential, further capacity for housing delivery during the plan period is also identified through sites already in the planning process or already under construction since 01.04.25 (start of the plan period) which didn't need a site allocation, and through windfall assumptions applied over the plan period. This is explained further in the SHLAA calculation of capacity.

Appendices

Appendix 1 - Sites rejected before Regulation 18

Appendix 2 - Sites proposed at Regulation 18

Appendix 3 - Site assessment after Regulation 18

Appendix 4 - Final site allocations at Regulation 19

