Background paper 001

Title: Housing Need, Requirement and mix

This paper addresses the overall need for housing in Oxford, how the housing requirement may differ from this, and the mix of unit sizes needed.
Relevant Local Plan 2045 Objectives: • Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • 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 and human health.

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1. Introduction

1.1 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. Oxford is an international city and important part of the knowledge economy, with a world-renowned university and hospitals. In addition, the mix of housing sizes also needs to be considered, as some will need smaller (1-bed) units and others larger homes to accommodate a large family. How to manage particular housing types such as Houses in Multiple Occupation (HMOs) is also important. This paper focuses on overall housing need and mix. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily. Meeting the needs of those in high housing need, or those who may struggle to afford to remain in the city, is also important to meet social objectives such as overcoming inequalities and improving health and wellbeing. Affordable Housing is considered in Background Paper 002. Particular groups have particular housing needs, including students, those who need extra care, gypsy, traveller and boaters. Specialist housing need is considered in Background Paper 003.

1.2 This topic paper begins with a review of the national, regional and local policy context relating to housing need and requirement. It then goes on to look at the current situation in Oxford and includes a discussion on housing need and Oxford's housing target. The

"current situation" section then moves on to discuss housing supply. The next section talks about the likely future without a new local plan and discusses housing supply and the competing pressures for limited land available in the city. Finally, some key sustainability and plan issues are identified.

1.3 Historically Oxford has been unable to meet its calculated housing need. The last round of Local Plan's in Oxfordshire aimed to meet the needs assessed in the 2014 Oxfordshire Housing Market Assessment, updated for Oxford in 2018. Oxford's total capacity for housing was less than its calculated need. So unmet need was taken by the other districts' local plans (full details are set out within this paper).

1.4 The Oxford Strategic Housing Land Availability Assessment (January 2026) shows that the current capacity is 9,267 dwellings for the Local Plan period 2025-2045 (including a 10% buffer to applicable sites). This shows that Oxford's total capacity for housing is still less than its calculated need.

1.5 Paragraph 71 of the NPPF states that a range of market and affordable housing types should be available to meet a wide range of needs. Policy H5 contributes towards this by shaping the size of dwellings. The evidence which has informed the % requirements include the Updated Specialist Housing Needs Evidence (2025, Iceni) combined with factors from the affordable housing register including mix of unit sizes, need to downsize and the existing housing stock.

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

National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance. The NPPF also considers that the needs of groups with specific housing requirements are addressed. Paragraph 63 provides an indication of those groups which includes, older persons, students, and gypsies and travellers. Paragraph 69 sets out that a housing figure for the whole local authority area should be included by strategic policy making authorities and Paragraphs 72-77 provide the national policy position on identifying land for homes. Paragraphs 78-81 discuss how strategic policy making authorities should maintain the supply and delivery of new homes.

2.2 The National Planning Policy Framework (NPPF) (2024) requires local planning authorities to plan for a mix of homes based on current and future demographic trends, market trends and the needs of different groups in the community. The size, type, tenure and range of homes needs to reflect local needs to ensure that mixed and balanced

communities are supported. The housing need across Oxford is high and as such all types and sizes of dwellings are required. However, some sites and the area context will lend itself to certain mixes of dwellings. The city centre and district centres are most likely to be suitable for higher density developments and it is expected that dwelling densities would continue to be higher than those in neighbouring districts reflecting Oxford's urban area.

National Planning Practice Guidance (PPG)

2.3 The National Planning Practice Guidance (PPG) includes additional guidance on the following housing topics relevant to housing need and supply:

- Housing and economic land availability assessment;
- Housing and economic needs assessment;
- Housing needs of different groups;
- Housing needs for older and disabled people;
- Housing supply and delivery.

2.4 The PPG re-iterates the expectation for strategic policy-making authorities to follow the standard method for calculating housing need (Paragraph: 002 Reference ID: 2a-002-20241212). This explains that the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. This is intended as an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this assessment does not produce the housing requirement figure.

2.5 The PPG goes on to explain the housing requirement (040 Reference ID: 2a-040-20241212). The PPG says that, once the need is calculated using the standard method, the planning authority should make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

2.6 The PPG also provides advice about assessing land availability within the boundaries of a plan-making authority including setting out the purpose of this assessment. Paragraph 001 Reference ID: 3-001- 20190722 of the PPG sets out that "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." In relation to whether or not a site should be allocated, the PPG sets out that the role of the land availability assessment is 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.

Regional and Local Context

Oxfordshire Housing and Growth Deal

2.7 The Oxfordshire Housing and Growth Deal supports the delivery of 100,000 homes in Oxfordshire between 2011 and 2031 and secured £215million of funding including £60million for affordable housing and £150milllion for infrastructure improvements including for road and rail. As part of this deal, there was a commitment to produce a county-wide strategic plan. For this reason, work began on the Oxfordshire Plan 2050, which was to provide high-level strategy to inform the districts' local plan, including on housing need and the housing requirement for each district. However, work on this plan was eventually aborted by the constituent authorities.

Neighbouring Local Plans

2.8 In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of housing need identified in the 2014 Strategic Housing Market Assessment (SHMA) due to the constrained nature of Oxford. Oxford's need was assessed as a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). The approach taken by the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) was that the mid-point of this range should be taken as the starting point for assessing the level of need and unmet need (i.e. 28,000). Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. The assumed capacity for Oxford was 10,000 dwellings.

2.9 In the last round of Local Plans, the other Oxfordshire districts agreed to deliver 14,300 dwellings, which met the majority of unmet need arising from Oxford's Local Plan 2036. These were apportioned as follows:

Table 2.1

Cherwell Local Plan	4,400
South Oxfordshire	4,950
Vale of White Horse	2,200
West Oxfordshire Local Plan	2,750

2.10 Originally, the intention for the next round of local plans was that housing need and requirements would be informed by the Oxfordshire Plan 2050. The Oxfordshire Growth Needs Assessment was undertaken, agreed and published, and initial work on the Oxfordshire Plan 2050 consulted on. This had not yet got to the point of developing a strategy to use to apportion the need between the districts. Further work to update the OGNA was commissioned, but agreement on this work could not be reached, and work on

the Oxfordshire Plan ceased. Work had commenced on the Oxford Local Plan 2040, and to enable this to continue, Oxford, with Cherwell, commissioned a Housing and Economic Needs Assessment to inform the housing need of those two authorities. The Oxford Local Plan 2040 was submitted for examination on this basis, but the Inspectors concluded that the duty to cooperate had not been met because the HENA looked at the whole of Oxfordshire in order to establish the housing need of the two authorities.

2.11 Work has continued on local plans in each Oxfordshire district, however in the meantime delivery of homes to meet Oxford's unmet need for has been very slow to come forward. Negotiations and joint working have been on-going to ensure strategic sites deliver for Oxford's unmet need, including for example co-operative working on Development Briefs and by ensuring there are signed agreements on nomination rights for the affordable housing, so it meets the needs of those on Oxford's housing list. More details are provided in Section 5 below.

Oxford Growth Commission

2.12 The Interim Report of the Oxford Growth Commission (2025) highlights that *"local authorities collectively are not planning to meet their minimum housing requirements on a County wide basis".* Failure to meet Oxford's unmet need does not "support the scale of economic growth across the County" which are linked to the government's ambitions for the Oxford-Cambridge Growth corridor, and forecasted population growth.

Oxford Local Plan 2036

2.13 The Oxford Local Plan 2036 contains a number of policies relating to housing need and supply. In particular Policy H1 sets the housing requirement for the plan period. The housing requirement for the plan period from 2016-2036 is 10,884 homes, which is a stepped trajectory to reflect the anticipated delivery of housing over the plan period. The housing requirement in the Oxford Local Plan 2036 is as follows:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

2.14 Policy H4 sets the mix of dwelling sizes. This applies only to affordable housing. For market housing, an explanation of the proposed housing mix is required. There are exceptions to the policy requirement for affordable housing, for example in the city and district centres, where density may be high and only smaller units are suitable.

Housing and Economic Land Availability Assessment

2.15 This is a constraint-based assessment that seeks to identify sites and broad locations and assesses their development potential. The assessment looks at whether sites and broad locations for development have the potential to come forward as part of the development plan process. (i.e., are sites or broad locations for development available and achievable?) The most recent one carried out for Oxford was to support the Oxford Local Plan 2040 and was completed in September 2023, with an addendum completed in March 2024. This

showed the capacity of Oxford to be 9,851 for the period 2020-2040, which is an average of 493 dwellings per annum. This will be updated to support the Oxford Local Plan 2045.

Oxford City Council "Our Strategy" 2024-2028

2.16 One of the five main priorities of the City Council's strategy to 2024 is to deliver 'good, affordable homes'. The strategy recognises that 'To address Oxford's housing issues we must drive up standards for existing housing alongside a focus on providing new homes, working in partnership across the housing sector.'

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

Housing Need

3.1 In national planning policy, an area's housing need is different from the housing requirement. The NPPF December 2024 makes it clear that the assessment of housing need should be generated using the Government's Standard Method. Oxford's housing need has been calculated as 1,087 dwellings per year, using the standard method and affordability ratio (Office for National Statistics, March 2025). The housing need figure may be updated after the new affordability figures are released in March 2026.

Housing Requirement

3.2 The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method. It also recognises that there may be unmet need, if the housing need is greater than the number of homes that can realistically be delivered within the plan period within the planning authority's area. This is the case in Oxford as the housing need is significantly greater than the capacity of the city.

3.3 There are very significant constraints on the capacity of the city – physically with the city's tight administrative boundary and Green Belt, and environmentally with large areas of national and international biodiversity interests and areas within flood zone 3b functional flood zone as well as heritage and townscape considerations. Oxford's housing requirement is therefore a constrained and capacity-based target. The Inspector for the Oxford Local Plan 2036 acknowledged in his report that Oxford's housing requirement was only a proportion of the total number of homes that made up the total housing need.

3.4 Oxford's physical and environmental constraints on its capacity for growth are not new issues and through the joint working undertaken as part of the Growth Board, an element of Oxford's unmet need was apportioned to the surrounding Oxfordshire district councils to accommodate within their administrative areas as part of the Duty to Cooperate process. This led to strategic allocations for growth in plans for all of the Oxfordshire district authorities most recent Local Plans.

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

Housing Supply

4.1 Oxford's constrained capacity for housing land has traditionally meant that there is strong competition for land for housing, student accommodation, employment and other uses. In order to help address the supply of housing, the strategy for the Oxford Local Plan 2036 was housing-focused and prioritised delivery of homes. The strategy sought to allocate no new employment sites, instead prioritising the loss of certain low quality, poorly located employment sites (category 3 employment sites) for housing. Notwithstanding this approach, there is continued pressure on infrastructure as a large proportion of housing developments are on small-scale infill sites and offer limited opportunities to deliver new on-site strategic infrastructure. This has been exacerbated by changes to national policy in recent years which include permitted development for residential conversions from other uses including offices and shops. Such changes of use are not subject to the same planning considerations in relation to supporting infrastructure to support the new homes formed.

4.2 Work with the other Oxfordshire authorities has resulted in a number of strategic allocations being made in the plans of our neighbours to help meet housing need. Other actions by the City Council to deliver housing, such as setting up a housing company and setting affordable housing delivery as a corporate priority, will continue to push forward housing delivery.

Housing Completions

4.3 Since 2006, the majority of new homes have been delivered on small-scale, dispersed brownfield sites, either re-developing existing units or converting existing buildings. The city's last remaining strategic greenfield sites are Barton Park and Oxford North. For the last few years, annual delivery at Barton Park has made a significant contribution to housing delivery, and more recently housing has begun to be delivered at Oxford North.

4.4 Table 4.1 shows the net additional completions from 2016/17 (the base date of the 2016 Local Plan) which is taken from the 2023/24 Annual Monitoring Report published in December 2024. This takes into account dwellings gained and lost through new build completions, demolitions, changes of use and conversions and includes completions of purpose built student accommodation.

Table 4.1 - Showing net additional completions since 2016 (Oxford City Council 2025)

Year	Dwellings (net) completed (built)
2016/17	419
2017/18	367
2018/19	358
2019/20	790
2020/21	711
2021/22	581

2022/23	554
2023/24	365
2024/25	272
TOTAL (since 2016/17)	**4,417**

4.5 In the 24/25 monitoring year there were 272 recorded completions which represents a decrease compared to recent years. This follows a decrease in 21/22 and 22/23 compared to 19/20 and 20/21. This is reflective of both the lack of new large strategic sites, and also wider economic circumstances, including uncertainties from Brexit and the global economic situation (affected by Covid, the Ukraine war and other globally significant effects), and the lack recently of large student accommodation schemes. Changed economic circumstances have also tipped the balance towards delivery of economic development, particularly research and development, rather than housing, which has resulted in fewer conversions from economic sites to housing.

4.6 Likely trends without the plan include continued residential completions from a variety of sources including from Oxford City Housing Limited.

5. Key issues addressed through the Local Plan 2045

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to housing delivery objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Housing need

5.3 Housing need is an unconstrained assessment of the minimum number of homes needed in an area. The housing need for Oxford is determined by the Government's Standard Method for calculating housing need. The NPPF and PPG is clear that whilst alternative methods may be used to set the Plan's housing requirement, the Standard Method is the appropriate method for calculating housing need.

5.4 The December 2024 Standard Method uses a formula that incorporates a baseline of local housing stock, adding 0.8% to this, then adjusting upwards to reflect local affordability pressures, using the latest ONS median house price to workplace earnings ratio. The

method accounts for economic growth indirectly by application of the affordability ratio, as a number of pressures from a successful economy will impact on affordability, leading to an uplift when calculating the housing need. The Standard Method housing need for Oxford is currently 1,087, which is 21,740 over the 20-year plan period.

Housing requirement

5.5 Assessing housing need is the first step in deciding how many homes to be planned for. The number of homes to be planned for should be reflected in the housing requirement specified in the Local Plan. Policy H1 sets the housing requirement for the Plan period. The housing requirement may exceed the need if that can be justified based on, for example, economic ambitions. Likewise, a housing requirement can be set that if lower than the calculated need if there are constraints on capacity. In this case, a housing capacity assessment, carried out using the Housing and economic land availability assessment guidance needs to demonstrate that constraints limit housing capacity. It is also necessary to show that all efforts have been made to identify capacity for housing.

5.6 Over the 18 years from 2006/07 to 2023/34 housing delivery in Oxford has averaged 451 dwellings per annum, varying from 200dpa in 2010/11 to 821 in 2006/7. Therefore, from the outset, it has seemed unlikely that enough housing sites could be found to meet the identified housing need.

5.7 Every effort has been made to identify housing capacity in the city, as set out in the SHLAA. The SHLAA assesses the housing capacity over the Plan period as 9,267 dwellings (463dpa). Therefore, the housing requirement set out in Policy H1 is for 463 dwellings per annum.

Unmet housing need

5.8 Where a housing requirement set in a Plan is lower than the identified housing need, this creates an unmet housing need. The onus is on the planning authority generating this need to approach councils located where this need could be met appropriately, and to attempt to reach agreement for the unmet need to be incorporated into their local plans.

5.9 There is a long history in Oxford of working with our neighbours on housing matters, with the most recently adopted suite of Local Plans in Oxfordshire based on a joint assessment of housing need and an apportionment of, and provision for, Oxford's unmet need, As work has progressed on this Local Plan, there have been regular conversations between the Oxfordshire authorities on the likely level of Oxford's unmet need and the commitments of the neighbouring authorities to assist with this. In addition to the regular Oxfordshire Planning Policy Officers and Heads of Planning meetings the City Council took the initiative in Spring 2025 to set up a Duty to Co-operate Forum.

5.10 The Duty to Co-operate Forum has met every month since June 2025 to discuss Duty to Co-operate matters arising from our plan production processes and largely focussing on

Oxford's Plan and housing matters. This group has agreed a process for the conversation on unmet need with streams of work and key milestones identified to facilitate it. This has included: workshops on Oxford's SHLAA approach and emerging outputs, and the sharing of the full SHLAA report ahead of its publication: a formal request for assistance with unmet need; and confirmation of and collation of commitments of each of the Oxfordshire districts. This conversation is ongoing and has enabled an Interim Joint Statement of Common Ground to be published on the matter as part of the Regulation 19 consultation material, with the intention of publishing a detailed Memorandum of Understanding at the submission of the Oxford Local Plan.

5.11 The Interim Statement of Common Ground provides details on the commitments towards Oxford's unmet need in the adopted and emerging plans of neighbouring districts (as of January 2026). This confirms that Oxford has calculated the level of unmet need for the period 2025-2045 to be: 12,373 homes; that all the Oxfordshire authorities have in combination made provision for 14,300 homes in their currently adopted Local Plans; and that they plan to continue to provide for Oxford's unmet need in their emerging Local Plans (the emerging Plans of Cherwell, South Oxfordshire, Vale of White Horse are currently at examination and West Oxfordshire has recently published a Regulation 18 consultation document). This gives the City Council confidence that our identified unmet need can be met.

Housing mix

5.12 The Updated Housing Needs Assessment (2025, Iceni) provides an analysis of housing need including mix, size and tenure of homes needed. To consider the mix of homes needed, a model is applied that starts with the current profile of housing in terms of number of bedrooms and the tenure. Data about the age of households and typical sizes of homes they occupy enables demographic projections to be applied to see how much each age group is expected to grow in number and therefore the profile of housing need over the 2025-2045 period. The size of housing that households occupy relates more to their wealth and age than the number of people they contain, so in projecting it is not simply assumed that an increase in single-person households will automatically translate into a need for smaller units. Issues of supply can also impact occupancy patterns. The issue of choice is less relevant in the affordable sector. Table xxx below shows the identified need for different sizes of unit by tenure.

Table 5.1: Modelled mix of housing by size and tenure (assuming capacity-led level of housing growth).

	1-bed	*2-bed*	*3-bed*	*4-bed*
Market	*10%*	*26%*	*41%*	*23%*
Affordable home ownership	*24%*	*35%*	*24%*	*16%*
Affordable housing (rented)	*30%*	*34%*	*30%*	*5%*

Source: Iceni Housing Market Model

5.13 In setting the mix for the affordable housing element of a scheme, as well as the modelled outputs based on demographics, information about current needs represented by the housing list. The City Council's Housing Services team are able to understand immediate and pressing needs. Following consultation with Housing Services, it was established that the current (and immediate) demand for 2-bed homes is relatively low. On the other hand, there are currently long waits for 1 bedroom properties. This is expected to be a long-term trend, with countywide homelessness transformation moving to a Housing–Led model seeking to move people into supported accommodation and rough sleepers quickly into one bedroom accommodation, so demand will continue and expect this pressure to further build.

5.14 It is important that an appropriate mix of dwelling sizes is provided to help meet the needs of the range of household types, with an understanding of immediate needs, but also needs projected over the Plan period. A range of sizes will allow more flexibility over time. Therefore, Policy H5 sets out the appropriate mix of dwelling sizes. A mix is provided for affordable rented forms of dwellings, and separately for affordable rent for those over 65 and also for affordable ownership forms of homes. These mixes are provided in the form of range to allow for other site-specific considerations to inform the exact mix.

5.15 There are a number of other factors that influence the appropriate mix on a particular site including the site context and local needs. To enable a fully flexible response to current and site-specific requirements, no mix is set out for market housing, However, Policy H5 does set out that evidence will be required to support the proposed mix on residential sites, which can draw from the Specialist Housing Needs Evidence, market demand, design considerations and housing register.

Appendix A- Policy Options and Preferred Approaches

Policy options set 001a (draft Policy H1): Housing requirement

The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need. It is important that the overall housing need is fully understood, in order to be able to plan to meet that need. The NPPF is clear that the housing need should be calculated using the Standard Method. The strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

This means that there are not really options for calculating housing need. The housing need for Oxford calculated by the Standard Method introduced in December 2024 is currently 1,087. That means that the housing need over the 20-year plan period 2025-2045 is currently 21,740.

However, there are different potential options for the housing requirement set out in the Local Plan. The housing requirement is what it is expected will be delivered each year. The housing land supply will be calculated using this figure, and it will be used as the target for the Housing Delivery Test. The NPPF sets out that the requirement may be higher than the identified housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment

Table 1 - Policy options set 001a: Housing requirement for the plan period

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).	The NPPF says that local plans should aim to meet identified need. Meeting housing need in full would help reduce social problems such as overcrowding and homelessness, as well as problems employers have attracting staff. It may help improve affordability. Meeting housing need within the city may help communities stay together.	It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 400dpa, which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable.
Option b Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with	The requirement would be deliverable within the city (this is the only option that achieves this). The principle has been tested at examination and found sound for LP2036, the Core Strategy, and the 2016 Local Plan before that.	It will need to be shown that need is being met elsewhere if provision is not made for the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement. If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.

the spatial strategy (c.9,800 dwellings over the Plan period 2022-2042).		
Option c Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.	The Standard Method need calculation is based on existing housing stock with an affordability uplift applied. It does not, therefore, necessarily take account of the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.	The HELAA evidence base indicates that this option would be undeliverable in Oxford over the plan period, thus there would be significant unmet need issues and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

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 should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** These options are about the housing requirement that has been determined as the basis of the Local Plan. The housing requirement may differ from housing need, which is calculated using the Standard Method. The NPPF states the

housing requirement may exceed the housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment. There are growth ambitions for Oxford, but there is also limited capacity. Reflecting these growth ambitions through an increased housing requirement would only lead to a greater level of unmet housing need, which could not be met in Oxford anyway. Setting the housing requirement at the level of the Standard Method need calculation would mean that many other aims and ambitions would need to be compromised, and it is likely would still be unachievable. The housing requirement may also be lower than the need in order to reflect those constraints on capacity (option b).

In terms of sustainability impacts, the most relevant SA criteria are **criterion 4 local housing needs** and criterion **12, to achieve sustainable economic growth**. However, there is potential for indirect impacts on a broad range of criteria, if the strategy is to attempt to meet housing needs, which would compromise other objectives. Delivery of housing is essential to meet local housing needs, and indicators suggest there are many negative impacts in Oxford form a severe lack of suitable, affordable homes. Housing is also necessary to sustainably support economic growth. There is, therefore, potential for significant impacts from these options and they should be taken forward for further appraisal.

Housing Requirement – Draft policy H1

The preferred approach for the Local Plan 2045 is to have a local policy that sets the total housing requirement over the plan period, and annualised. The housing requirement could be based on the identified need, or could exceed it in order to support a greater level of economic growth. However, the preferred approach is to base the housing requirement on the housing capacity. This is to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would certainly mean that pressure would be placed on other policies aiming to meet the Plan' strategy, such as in relation to green infrastructure .

The options set was tested through the Sustainability Appraisal with Option B performing better in balancing positive and negative impacts. Option B scored positively for meeting housing needs and economic growth because it makes an important contribution to housing need and was more positively scoring compared with the other options in relation to objective 10 (biodiversity), 11 (heritage), 9 (water), 7 (adequate Green Infrastructure) and 2 (resilience to climate change). This is because the capacity-based target can take account of these other considerations. Whereas if the aim was to meet the need above the identified capacity, as in the case of Options A and C, whilst these options do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan.

This means **option B** is proposed as the preferred approach.

Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms)

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. There are a range of considerations in setting a mix, including that some sites and locations will be more suitable for different types of dwelling, and that needs may change over time. Ensuring a range of units sizes is available will be key to meeting a range of needs. The mix could be defined by number of bedrooms or bedspaces.

Table 2 - Policy options set 001b: Mix of dwelling sizes (no. bedrooms)

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a Set a policy mix to ensure a range of sizes of unit for affordable housing only (this would apply to all tenures except the market housing).	It is important that there is a housing mix where possible to meet a wide range of demand. The affordable housing mix will be informed by the housing register (a snapshot in time), existing housing stock, and acknowledgement that tenants' needs change over time and may need to downsize.	A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if there was no requirement for large units, or the local context may be more suited.
Exclude certain areas or types of development from any set mix where they would benefit	This ensures that where a mix is most suitable it will bring benefits of ensuring a range of units to meet a range of needs, but where it is not relevant or beneficial there is greater flexibility.	Depending on the exclusions, this may significantly reduce the number of sites where a set mix is required, which could affect the availability of a range of sizes over time.

from greater flexibility. For example exclude smaller sites where there is less opportunity to create a mix, avoid high density areas such as the district centres as they are suitable for small units to further increase density, do not apply to employer-linked housing as there will be specific needs linked to the staff.		
Option b Set a mix for both market and affordable homes and on a broad range of sites, for example including all those over 10 units.	This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.	This would not allow for a flexible response to the market, to changing needs in an area, or the context of a site. This more prescriptive policy approach would mean that sites at district centres and in the city centre would need to have a range of unit sizes, rather than just those that maximise density, so overall numbers may be reduced. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example.

Option c Do not specify a mix of unit sizes for any type of development but do require at least 2 or 3 types of unit size in all developments over, for example, 25 units.	This would enable the mix to be tailored to the site context and the most up-to-date data, for example the current needs on the housing list. It would also ensure there is more than one unit type coming forward. More flexibility would allow more tailoring to the location.	This level of flexibility in the policy requirement could be met by a very limited range of unit sizes. It would be more likely to fail to meet identified needs and could lead to an imbalance in sizes of new units entering the market and available as affordable housing, both in the short term and the longer term.
Option d Do not specify a mix but require the mix to respond to the Housing Register and therefore identified needs.	Such an approach could help ensure that what is being delivered is meeting immediate needs. It would provide an indicative mix which would also be informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.	Such an approach is dependent on reliable and up to date data. The housing list is only a snapshot in time (updated continuously). If for example there are several years with a need mainly for small units and only those are delivered, this will lead to a lack of variety, then in later years when needs may change and there will not be enough larger units to accommodate needs appropriately. This would not achieve mixed or balanced communities. It would not provide enough certainty for developers; a policy with a changing requirement may not be found sound.
Option e **Do not include a mix policy.**	Provides complete flexibility.	The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. It would be difficult to demonstrate that the Plan is providing for the needs of different groups in the community as per the NPPF. One-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.

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, c, d, e or a+b or a+c).
High-level screening conclusion? - the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No

Rationale: There is no specific national requirement for a policy although it is indirectly important to helping meet NPPF requirement and there is local context which supports the inclusion of some sort of locally prescribed approach although various constraints in Oxford lead to several potential options for how best to formulate a policy. Options a and c represent different levels of scope over which to apply a mix requirement (applying just to affordable element or market provision too), meanwhile options d and e represent different ways to influence mix without having such a broad mix specification as is presented in options a and c. Option e is simply to not set a local policy in relation to housing mix and could be considered as another different option. Option b is more of an additional dimension to specifying a housing mix policy and could be incorporated alongside either option a or c.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, most directly, this would be **criterion 4. Local Housing Needs** because of how they influence the balance of dwelling sizes that could come forward and help to meet needs of different groups in the community**.** Indirectly, the options also have impacts that relate to **criterion 5. Inequalities**, with some of them influencing the mix within the affordable housing element which will help to cater for those who have more difficulty accessing affordable housing, as well as **criterion 3. Efficient Use of Land** (because mix can influence how many dwelling on a site) and **criterion 11. Urban design** (influencing housing mix can influence an applicant's ability to reflect local context).
Between the options, the level of sustainability impact is unlikely to vary significantly, with each of the option a, c, d or e likely having a minor positive impact for SA criteria 4. and 5. and minor negative for criteria 3. and 11. There is a potentially more positive and more negative impact in option c that addresses both market and affordable, with these impacts decreasing towards neutral across option a and then options d and c. Option e of not having a policy would likely be a neutral impact in terms of sustainability impacts. Overall, the extent of sustainability impacts is not considered to be significant for any of the criteria regardless of option and the relevant SA criteria that the impacts relate to themselves do not differ significantly between the options, so it is not considered necessary to scope in for detailed assessment.

Section 5 identified that there were a number of topics that the Local Plan 2045 could implement policy to address housing need, requirement and mix. Under each of the topics, there were various options for policy approaches which could be taken, with differing

impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Mix of housing sizes – Draft policy H6

The preferred approach for the Local Plan 2045 is to have a local policy that sets a mix of housing sizes in certain circumstances, but for many schemes requires the chosen mix to be justified and explained, but does no se a specified mix. The proposed mix applies only to affordable housing, and excludes the types of schemes where the mix would be difficult to achieve, or conflict with other aims, such as in flats in the city centre or district centres where delivery of only one or wo bedroom units helps to achieve density aims and may be more fitting to the infill development often appropriate in these locations.

Whilst either of the four options, option A, B, C or D or various combinations of these could be taken forward, the preferred approach is a combination of **Options A and B** which ensures a mix of affordable home sizes to meet needs over the plan period, requires justification of the selected mix, and provides flexibility to respond to size-specific needs and changing circumstances.

Policy options set 001c (draft policy H8): Loss of dwellings

Given the scale of housing need in Oxford, it is important to ensure that the existing stock is protected otherwise the benefits of delivering new housing would be undermined. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from family homes or from the longer term private rented sector. There are a range of considerations in setting an approach however the lack of available land and sites can constrain development of other facilities needed to support the local community. Future legislation may help us to control changes of use to short term lets.

Table 3 - Policy options set 001c: Loss of dwellings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Resist a net loss of dwellings	Such specific reasons for an exception could include conversion to a nursery or primary care facility;	The loss of dwellings undermines the benefits of building a mix of new homes.

except for specific reasons.	therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.	
Option b Resist the subdivision of family homes.	Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.	Precludes the sub-division of the existing housing stock which in some instances would be a better or more efficient use of land in a particular location and provide more homes where the need is so great. The loss of family dwellings undermines the benefits of building a mix of new homes, which include homes suitable for families
Option c Have no restrictions on the loss of dwellings.	No restrictions means that housing stock can be changed as the market demand requires. There would be more flexibility to respond to the market. Overall numbers of homes could increase.	Losing control over the existing supply of housing stock would undermine the benefits of bringing forward housing in new development to meet the population's current and future needs (objectively assessed need).

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various options/combinations (option a, b, or c or a combination of options a and b). **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **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 seeks to prevent the loss of homes unless their loss would provide or bring improved benefit to the local community. Option b seeks to specifically prevent the subdivision of family homes to help ensure that the

mix of homes available includes those suitable for families. Option c is to not set any restrictions at all via the Local Plan. Option a or b could be carried forward on their own or combined with each other.

In terms of sustainability impacts, the different options all relate primarily to **criterion 4. Housing Need, criterion 6 Essential services and criterion 11 Urban design.** Options a and b are likely to have more positive impacts against criterion 4. Option c could potentially place a greater demand on local services, having the potential to have a negative impact on criterion 6. Option c could also potentially lead to more of a negative impact against criterion 4 as the populations' current and future housing needs are not able to be met and also criterion 11 as the character of the neighbourhood could change as demand for local services could change. Overall, the sustainability impacts do not differ significantly between the options and it is not considered necessary for detailed appraisal.

Development involving Loss of dwellings – Draft policy H8

The preferred approach for the Local Plan 2045 policy is to have a local policy that addresses the protection of existing housing stock. This will help to relieve pressure on the use of dwellings that are of a suitable size for families and assist with the management of demand for residential units to be subdivided or converted or be brought into use as short term lets.

This means either **option A or B**, or a combination of both option A and option B could be taken forward. Option A will help ensure that homes are not lost unless their loss would provide or bring improved benefit to the local community. Option B will help prevent the subdivision of homes and ensure that the mix of homes includes homes that are suitable for families.