

The Local Plan 2045 will be used to ensure Oxford is a fairer, greener and healthier city

OXFORD LOCAL PLAN 2045

OXFORD CITY COUNCIL

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 6: Housing Land Supply

Issue 1 – Total land supply

Q1 What is the most up-to-date position regarding the projected supply of housing over the plan period?

The total projected supply of housing over the plan period is 9,041 homes or 452 dwellings per annum, based on the SHLAA June 2026 update (HEA.004a and HEA.004b). The trajectory to show the estimated annual rates of delivery of this total, is set out in CSD.009, also updated to June 2026.

Q2 Is the projected supply of housing justified and has sufficient land been identified to ensure that the housing requirement will be met, including an appropriate buffer to allow for changing circumstances on development sites?

The projected supply of housing for the plan period is based on a robust and proportionate evidence base, primarily the Strategic Housing Land Availability Assessment (SHLAA) June 2026 (HEA.004a). The capacity calculations include an appropriate buffer to allow for changing circumstances, and sufficient land/sites is identified to demonstrate that – alongside other sources of supply such as windfall – the housing requirement will be met over the plan period.

Summary of projected supply of housing, reproduced from the SHLAA (HEA.004a)

Completions within the plan period (major and minor completions in 2025/26)	700
SHLAA Table B identified sites (major commitments, site allocations, including 10% non-implementation buffer on non-commenced sites)	5,512
Minor commitments total (2026/27, 27/28, 28/29)	173
Windfall from minors (111dpa for 16 years)	1,776
Windfall from majors (55dpa for 16 yrs)	880
Total capacity 2025-2045 (rounded)	**9,041**

Evidence base for supply of housing

The main evidence to demonstrate the supply of housing is the SHLAA, which was most recently updated in June 2026 (HEA.004a). The SHLAA fulfils the requirements as set out in the National Planning Policy Framework (NPPF, December 2024 version[1]) and associated Planning Practice Guidance Housing and Economic Land Availability Assessment[2], for the assessment to:

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

Further information on each of these stages can be found in section 2: *SHLAA Methodology* in the SHLAA (HEA.004a) (pages 7 – 27). Details of the individual site assessments can be found in

Table A – All Sites Assessed, and Table B - Sites with development potential (HEA.004b) (pages 49-144).

Table A lists all sites which have been considered and includes assessment against the PPG criteria on the suitability, availability, and achievability of each site for housing and/or economic use. 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. Over 500 sites have been included in the assessment. These are set out in Table A – All Sites Assessed (HEA.004b) (pages 49-139). Further information on the sources of sites and exclusions can be found in paragraph 2.14-2.19 of the SHLAA (HEA.004a).

Table B lists only those sites which are suitable, available, and achievable, assesses the development potential of each site and estimated timescales for delivery. The housing capacity from sites identified as Suitable, Available and Achievable and capable of delivering 10+ net dwellings is 6,567 (Table B identified capacity 2025-2045).

A 10% discount is then applied to some of the sites contributing 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 (see explanation below). In addition there is an estimated contribution to the housing supply from minor commitments (small sites <10 dwellings, with planning permission) of 173, and from windfall (minors and majors) sources of 166 dwellings per year (2029/30 to 2045) to the SHLAA capacity calculations. The total housing supply identified is therefore 9,041 dwellings for the Local Plan period 2025-2045 (including a 10% buffer to applicable sites).

Non-implementation discount / buffer for changing circumstances

A non-implementation discount has been set to 10%. This is appropriate. It reflects the assumptions applied in the OLP2036 and tested at previous Local Plan examination. The discount on the capacity calculations is to ensure that the housing requirement figure is actually achievable. 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.

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.

Factors 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.

In Oxford there are additional challenges because in Oxford many development sites are small; and 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.

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.

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.

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.

As demonstrated above, this combination of reasons, somewhat unique to Oxford, 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.

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.

Table B indicates the planning status of each site, and whether a site already has planning permission. This is relevant because as identified in HEA.004a (paragraphs 3.2 - 3.12) a 10% non-implementation discount is not applied to sites that are under construction or that have been built out during the plan period. 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. If a discount were not applied, it would be assuming that every single site identified in Table B will come forward, in the identified time period.

Other housing supply which will contribute to meeting the requirement

As well as the supply of specific sites listed in SHLAA Table B, the supply of homes for the plan period also includes:

- one years' worth of completions in 2025/26 which falls within the plan period 2025-2045;
- Planning permissions for small sites (less than 10 homes) ("commitments");
- and a supply from windfall sites.

The completions data is calculated from monitoring data, published annually in the Authority Monitoring Report. The 2025/26 AMR is not yet published and is due to be considered by Oxford City Council's Cabinet at their December 2026 meeting. Any Table B sites which have delivered homes in 2025/26 are indicated in the column "completions in 2025/26", but there would also be other sites contributing towards the completions for 2025/26, including minor developments of less than 10 homes. The provisional AMR data indicates that there were 700 dwellings completed in 2025/26. Further analysis of the sites is set out in the AMR.

There is also supply identified from small sites with planning permission (minor commitments, 173 units- see table above). These are not listed in the SHLAA Table B because the threshold in the SHLAA is sites expected to deliver 10+ homes. The small sites commitments supply figure is calculated from the monitoring data in the council's housing trajectory, which tracks delivery of planning permissions. It is calculated from the sum of the expected homes to be delivered from all sites with active or unimplemented planning permissions for fewer than 10 net dwellings. The sum is then split evenly across the three years that small sites commitments is applied to (currently 2026/27, 27/28, and 28/29) because those sites could theoretically commence at any time within the three years before the permission expires.

The supply also includes a windfall assumption for major (55dpa) and minor (111dpa) sites, which is applied to 16 years of the 20-year plan period.

In conclusion, the evidence to demonstrate sufficient housing supply to meet the identified requirement in Policy H1, is robust and proportionate.

Issue 2 – Five Year Housing Land Supply

Q1 What is the five-year housing land requirement?

The most up to date five-year housing land requirement is set out in EXAM.020. This calculation, published October 2026, supersedes the previous calculation (CSD.012) because in August 2026 the Government published the latest Housing Delivery Test (HDT) measurements. The result of the latest measurement shows Oxford as delivering less than 75% of the HDT requirement and therefore in accordance with the NPPF and HDT Rule Book is now required to apply a 20% buffer to the housing land supply calculations, along with other consequences. This is shown in row C of the table on page 2 (EXAM.020).
The resultant updated 5-year land supply (including 20% buffer) is 5.94 years for the five-year period after adoption, which will be monitoring years 2028/29 to 2032/33.

Q2 Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

The number of dwellings that are expected to be delivered in the first five years following adoption of the Plan (2028/29 to 2032/33) is set out in EXAM.020. The table on page 2 identifies the deliverable supply in the five-year period, as 2,815 homes (Row G). This supply figure includes the following: the forecast supply from large sites including site allocations in the Local Plan 2045 (Row D, 2,094 homes), outstanding permissions on small sites of less than 10 dwellings (commitments) (Row E, 57 homes), and a windfall allowance (Row F, 664 homes).

Q3 What is the evidence in the Local Plan Housing Land Supply Templates (Large Sites) based on? How has the Council tested delivery assumptions?

The Housing Land Supply Templates (Large Sites) (HEA.008a) are informed by a range of sources across the evidence base. In effect, they provide a headline summary of the evidence about the sites, re-presented in the format required by the PINs templates, which were a new requirement for Local Plans that arose only very shortly before LP2045 was submitted.

Much of the evidence in the templates is drawn from the SHLAA assessment of sites in Table A - All Sites Assessed and Table B - Sites with Development Potential (HEA.004b), which include information about Availability and Achievability in accordance with the PPG for Housing and Economic Land Availability Assessment.

This is supplemented by more detailed information about delivery years from the Council's Housing Trajectory because the SHLAA Table B estimates the delivery years in five-year bandings across a 20-year period 2025-2045 (HEA.004a paragraphs 2.67 – 2.71) whilst the templates required individual delivery years and only for a 15-year period. Delivery years are estimated in accordance with the PPG, engagement with landowners about how advanced their proposals are, and other evidence about the site such as its suitability and availability, as well as officer judgement from experience of similar types of sites being delivered in Oxford in recent years.

Landowners had been contacted during the drafting of the Regulation 19 version of the site allocation policies and again at the Regulation 19 consultation, and planning/monitoring records updated, so the SHLAA commentary about sites was already updated to early 2026. However, when the requirement to complete the templates was announced by Government in May 2026, the Council contacted landowners to re-confirm again delivery assumptions and any progress being made towards submission of an application or site assessment work, to ensure the templates were as up to date as possible and also revisited monitoring data and planning records to review any progress of sites. Where a Statement of Common Ground was also being prepared with a landowner, the engagement was incorporated into that process. Any updated information received about sites for the templates was also updated in the SHLAA as well (and is therefore also reflected in the updated trajectory presented in CSD.009).

Q4 Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

The Council has assigned delivery periods for sites identified in the plan or identified in Table B supply (which might not have site allocations but are major developments known about), informed by the NPPF definition of deliverable (Glossary of NPPF).

The Council has only included sites in the five years post adoption, where there is an extant planning permission in place (including a resolution to grant permission). Sites with consents are indicated in SHLAA Table B and the PINS Templates. Sites that have only a site allocation, permission in principle, or are on the brownfield register, are not included in the five years unless they have a planning permission. As such, only sites which have a planning permission are assumed to have any housing completions within the five years post-adoption. This approach has been applied to ensure that the data for the housing land supply calculations (for development management purposes and for LP2045) are robust and only include sites which meet the definition of 'deliverable'.

The delivery assumptions, such as phasing, are also informed by officer judgement of past delivery of similar sites in Oxford and understanding of the development market in the specific context of Oxford. In particular, there is a large proportion of small-medium sized sites, the majority of which are brownfield redevelopments or conversions, and under a single landowner.

In some instances, landowners have indicated that they expect to have completions on their sites sooner, for example where there is a planning application pending determination (such as the Former Iffley Mead Playing Field, Policy SPS6 (HEA.008a, page 11). However, until a planning permission is in place, the SHLAA/trajectory assumes delivery after the five years in order to meet the NPPF definition. Where this is the case, this is indicated in the PINS templates.

The remaining sites were assigned later delivery periods in the plan period. A pragmatic approach was applied.

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 75 of the Framework?

The windfall allowance for the five-year housing land supply calculation is 664, as set out in the Table in EXAM.020 (row F). This comprises an assumption of 111dpa for minor windfall sites and 55dpa for major windfall sites. This approach is explained in more detail in the SHLAA Methodology (HEA.004a paragraphs 3.13 – 3.32) and is consistent with the requirements of paragraph 75 of the NPPF.

The windfall assumptions are informed by analysis of historic windfall delivery rates over a ten-year period, as well as expected future trends about the types of sites expected to come forward during the plan period.

For minor sites, the historic data shows that windfalls on sites of less than 10 dwellings have provided a variable but consistent source of housing supply in Oxford over the last 10 years. Analysis about the types of sites and developments which make up the small sites completions has been undertaken, 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. 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 writing the SHLAA (HEA.004a), the total minor commitments for the first three years 2026/27 - 2028/29 was 173 (total, not per year). As such, the windfall assumption of 111dpa is not unreasonable.

For major sites, the historic data shows that windfalls on sites of 10+ units have provided a variable, but not insignificant, source of housing in Oxford over the last 10 years. The windfalls have often arisen from student accommodation developments, office to residential conversions, City Council developments (directly or through the Council's housing company OX Place), and other brownfield opportunities arising from businesses moving or ceasing trading. These types of sites reflect the nature of the housing land supply in Oxford, and despite a thorough process in the SHLAA to identify as many opportunities as possible, it is expected that these sorts of developments are likely to continue to come forward as windfalls through the plan period. Partly, this is due to Oxford's favourable policy assumption towards residential use being acceptable in principle, which means that having a site allocation or the site included in the SHLAA is unnecessary. Also with conversions and brownfield redevelopments developers are responding to opportunities that arise as plots/ sites become available and responding to market conditions and need. This makes it more difficult to plan for those sites in allocations. In the context of Oxford this is particularly significant because of its constrained nature and relatively few larger scale sites. Also, those types of sites are less likely to need a site-specific site allocation in LP2045 unless there are significant site-specific constraints that need addressing, meaning they can come forward without site allocations. Given this 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 that windfall from larger sites is likely to continue over the plan period.

This analysis and evidence demonstrates that it is reasonable and justified to include a windfall allowance as part of the anticipated five-year housing land supply. The data shows an ongoing significant contribution of windfall to the housing supply, and there is no expectation that this trend would change during the plan period. Therefore Oxford City Council is 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 the SHLAA, they will be revised in future land assessments.

As explained in the SHLAA, the windfall is not applicable to years 2026/27, 27/28, or 28/29 because minor commitments figures are applied in those years using planning permissions data (rather than applying an estimated windfall assumption,) because the permissions data is more accurate than an estimated average. A windfall assumption is applied to the remaining years of the plan period. Therefore in calculating the five-year housing land supply for the post-adoption period 2028/29 to 2032/33, a windfall assumption is not applied in year 2028/29 (because minor commitments are counted) but an assumption of 166dpa is applied across the other 4 years (total 664).

Q6 Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

Assuming adoption of the Plan during 2027/28, the evidence indicates that there will be a five-year supply of deliverable housing sites on adoption of the Plan (5.94 years) including the 20% buffer for the period 2028/29 to 2032/33. This calculation is updated to October 2026 to reflect the latest Housing Delivery Test measurement published in August 2026

This is explained, and the calculations shown, in EXAM.020.