

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 7: Housing Type and Mix

Issue 1 - Affordable Housing from Other Development Types – Policy H3

Q1 What is the justification for requiring financial contributions towards the delivery of affordable housing from new employment-generating uses? Is this justified and consistent with national planning policy?

Lack of affordable housing is not just an issue for the housing market, it is also an issue for the local economy. It has long been recognised that the unaffordability of the local housing market and in particular the lack of affordable housing is a severe constraint on economic growth and potential in Oxfordshire. Delivering affordable housing is a guiding principle of the Oxford Economic Strategy (ECON.010a, page 25) and its Delivery Plan (ECON.010b, page 19); and is core to one of the four key objectives of the Strategic Economic Plan (ECON.004, page 38)

Employers report that the lack of affordable housing presents real difficulties in attracting and retaining staff. As the Local Enterprise Partnership identified in the Local Industrial Strategy: *"This constrained housing supply is making Oxfordshire increasingly unaffordable …This is exacerbating the inequality within Oxfordshire, making the region less attractive to global top talent, and less able to retain recent graduates from our universities and provide affordable housing for key lower and middle-income workers upon which the economy depends. This lack of ability to attract and retain talent can also hinder business growth and restrict investment into the region." (ECON.005, page 76).*

Commercial developments have the potential to generate demand for affordable housing because employment-generating uses can encourage workers in housing need to move to Oxford to take up new jobs generated by the proposed use of the new development. Furthermore, many of the sites likely to bring forward employment generating uses could otherwise be suitable for delivering new homes, from which provision of a percentage of affordable housing would have been sought under Policy H2.

Securing contributions towards affordable housing from employment-generating uses (as well as for new student accommodation and older persons accommodation) via Policy H3 can help contribute towards the supply of affordable homes in Oxford, and help to address the challenges faced by employers in terms of recruitment and retention. Therefore, there is a clear justification for the requirement for contributions from employment-generating development towards affordable housing. Whilst the affordable housing that is delivered as a result of the contributions would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing in Oxford, helping to reduce pressure on other forms of entry-level housing that workers might seek access to for example, and help address the issues faced by those businesses.

In most cases it is considered that financial contributions (towards provision of affordable housing off-site) are more likely to be appropriate than on site provision of affordable homes so Policy H3 is framed to secure this. For example, the level of developer contribution sought towards affordable housing means that very few sites if any, would likely to be able to deliver sufficient affordable housing units to make a quality scheme. In addition, many qualifying sites are likely to be designed in a way which would be challenging for registered landlords to manage the affordable housing units or are unlikely to be appropriate because of the different

housing needs and lifestyles. Whilst the Local Plan does make provision for the delivery of onsite housing (and affordable housing) on the key employment sites, these are the largest sites where site layout and design is most likely to be able to facilitate this appropriately and there are additional policy framework provided in Policy E1. Financial contributions are required on a comparable basis so that the development of sites for residential is not disadvantaged in the market or viability terms, in comparison with these other uses, and also avoids potential practicality issues associated with co-location of uses.

The level for the contributions is guided by the Viability report (SUP.002). It is set at a de-minimis level (£10 per square metre GIA, which is minimal compared to CIL charges of £176.24/sqm for offices and R&D,) so that it only has a very modest impact on the development costs for individual sites, but collectively could make an important contribution towards tackling the significant shortfall in affordable housing provision. The Viability Assessment estimates at that level, it represents around 1% of residual value for offices, between 1-4 % for other uses (SUP.002 Table 6.55.1 on page 79). The modelling tests the impact of the contribution in the cumulative policies analysis and also separately tested for typologies 20 (light industrial), 23/24 (office/R&D), and 25/26 (industrial/warehousing). It indicates that this is viable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development (SUP.002 Table 6.31.2 on page 60). The policy sets a threshold (section (e) of H4) so contributions will only be sought from developments delivering a net increase in floorspace of 1000sqm GIA or more. The threshold is intended so that the contributions policy only applies to development of a comparable scale to that which the other affordable housing contributions policies would have applied for sites delivering residential development (i.e. major development / 10+ dwellings or equivalent).

In summary, the requirement has been tested in the Viability evidence. The Policy is an appropriate strategy in Oxford, given the scale of affordable housing need and the direct impacts that this has on employers' recruitment and retention objectives. The levels are set at a level that collectively will make a significant contribution towards delivering much-needed affordable housing, but without imposing significant per sqm costs to applicants and without undermining deliverability of sites or the plan overall.

Q2 What are the thresholds for affordable housing based on where new student and older persons accommodation is concerned? Does this adequately reflect the viability evidence supporting the Plan?

Securing contributions towards affordable housing from new purpose-built student accommodation and from older persons accommodation can help contribute towards the supply of affordable homes in Oxford. Securing contributions from these types of development is important because many of those sites could otherwise have been suitable for C3 residential development, from which a percentage of affordable housing would have been sought under Policy H2.

Options were tested through the SA about what size of developments the contributions requirement should apply to. The options tested are explained in the Affordable Housing Background Paper (BGP.001b).

Financial contributions are required on a comparable basis so that the development of sites for C3 residential is not disadvantaged in the market or viability terms. This helps to ensure that the provision of affordable homes is not disadvantaged in the market in comparison with these other uses on the basis of viability.

As such, financial contributions are sought for sites delivering 10 or more homes or the equivalent number of student rooms at a ratio of 2.5:1. 2.5 student bedspaces to 1 dwelling is the ratio specified in the Government Housing Delivery Test. This means with a threshold of 10 dwellings for residential development affordable housing contributions in H2, the threshold for student accommodation is 25 bedspaces (or 10 or more self-contained units).

The Viability Assessment (SUP.002) indicates that a large proportion of the types of typical purpose-built student developments expected during the plan period could viably deliver this level of contribution. Exemptions are specified in Policy H3 where contributions would not be sought: for new student accommodation, the policy does not apply to development within university campus sites or redevelopment of existing purpose-built student accommodation that is currently and will continue to be owned and/or managed by the universities, because market housing would not usually be provided by those sites.

To clarify the exemptions, it is suggested that the word "proposed" (campus sites) could be replaced with "allocated" in H3 as follows:

b) Contributions towards affordable housing provision from new student accommodation will not be sought where:

- *The proposal is within an existing or allocated ~~proposed for~~ university or college campus site, as defined in the glossary; or*

It is also suggested to add wording to clarify that Policies H2 and H3 apply to C2 developments as follows:

Policy H2:

On self-contained residential developments (including Use Classes C2, C3 and C4 but excluding self-contained student accommodation, older persons accommodation and employer-linked housing)

Policy H3:

The City Council will seek financial contributions towards the delivery of affordable housing from proposals for new purpose-built student accommodation, new older people's accommodation and new employment-generating uses. This includes C2, C3 and Sui Generis developments.

...

On proposals for new purpose-built student accommodation (C2 and Sui Generis)

...

On proposals for new self-contained older persons accommodation (C2 and Sui Generis)

The draft policy seeks financial contributions towards affordable housing (rather than onsite provision of affordable housing) because in many situations, affordable housing would not be suitable to be provided onsite. For example, student accommodation is typically configured as flatted developments, so in practice it would be difficult to provide separate cores and entrances.

The same principles apply for older persons residential developments: many sites for self-contained older persons accommodation could equally be suitable for C3 residential development, from which an affordable housing would normally be sought. Contributions are therefore sought on a comparable basis, with a threshold equivalent to sites delivering 10 dwellings to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability as well as providing an additional contribution source of much-needed affordable housing to address local needs.

In summary, it is justified to seek affordable housing contributions from these forms of residential development, because many of those sites would also have been suitable for C3 residential development from which affordable housing contributions would have been required. These policy requirements have been tested through the Viability Assessment and without undermining deliverability of sites or the plan overall.

Q3 How will self-contained older persons accommodation be determined for the purposes of Policy H3? How does this take into account circumstances where high levels of specialist care are being provided, and any associated costs?

Older persons accommodation may be housing with support (e.g. sheltered housing, retirement homes) or housing with care (e.g. extra care, car homes). At the outset of plan-making and viability testing an assumption was made that older persons accommodation providing a high-level of care (housing with care) would already be meeting an important need and would be unlikely to have remaining viability for contributions towards affordable housing. This kind of residential care scheme with the most intensive level of care on-site does not come forward as self-contained accommodation so would not be captured by Policy H3. All older persons accommodation is explicitly excluded from Policy H2.

The type of older persons accommodation most likely to be provided as self-contained units is retirement housing, often aimed at owner-occupiers. These will have some but minimal adaptations for the occupiers. Sheltered housing and extra-care housing will have varying levels of care support, but those with the greatest degree of care provision will not be self-contained units.

The Oxford Local Plan Viability Assessment (SUP.002) did consider the viability implications of Policy H3 and its requirement for self-contained older persons accommodation. This

acknowledges in paragraph 7.2 that schemes for exclusive occupation by older people tend to have different economics to general purpose housing developments, which will affect the degree to which they can make contributions towards affordable housing. Nevertheless, the appraisals indicated that these schemes would be able to contribute significant contributions in lieu, and this helped inform the policy approach.

Issue 2 - Employer Linked Affordable Housing – Policy H4

Q1 What is the list of sites in Policy H4 based on?

The City Council has explored all options to secure the delivery of affordable housing. Policy H4 is designed to enable delivery of on-site affordable housing on sites that would not be suitable for delivering housing to the usual requirements of Policy H2. It is not intended as an alternative to H2, it is a supplementary approach to be used only in specific circumstances. The list of sites is restricted to specified sites and specified employers to avoid the policy being used to circumvent normal affordable housing contribution policies or the provision of social rented housing.

The specified employers are all public sector health and education providers who employ essential workers who can struggle with housing costs in Oxford, and importantly who own large sites in the city. The specified sites have been chosen for their suitability, availability and potential capacity to cater to the housing needs of essential workers. Crucially they are sites that would otherwise not be available for residential uses (for example due to being located on operational campuses, health facilities, or education sites), if they were not being developed for housing for staff. As such, the list of sites identified as appropriate for employer-linked affordable housing comprises university campus sites and healthcare sites. In the adopted Local Plan a number of schools were also included in this policy approach. The City Council did look at including schools or other public sector education sites, but there were no sites that were deliverable for residential uses during this plan period.

All sites specified in the policy have also been tested as deliverable, and there is a willing landowner/employer which has confirmed interest in delivering homes for employees during the plan period.

Q2 Is Policy H4 justified, and how will it contribute towards the creation of balanced and mixed communities?

Affordability (or unaffordability) of housing for people living in Oxford is a key issue to address in LP2045 and is also a corporate priority of the City Council more broadly. The supply of affordable homes to meet need in Oxford is a challenge, particularly Social Rent, but also market rates and discounted purchase options, such as shared ownership. Therefore in addition to the policies which require affordable housing contributions from developments (Policies H2 and H3), Policy H4 is a complementary policy which also seeks to boost the supply of affordable housing where there are willing employers in Oxford.

Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely or with hybrid working, such as in frontline healthcare, and teaching in schools and universities. Many of these workers are unable to afford market housing or even private rented accommodation in the city and find themselves living outside of Oxford with expensive and time-consuming commutes into the city, or living in shared accommodation in Oxford that is too small for their needs.

Employer-linked affordable housing is a bespoke approach in Oxford, in response to the urgent and significant levels of affordable housing need. The employer-linked policy was first introduced in Oxford in Local Plan 2036 as an innovative way for employers to address this issue by allowing the creation of "employer-linked affordable housing" as an alternative to the traditional "market and affordable" split on residential developments. This unique tenure allows employers (such as the University of Oxford or the Hospital Trusts), to provide accommodation for their staff at reduced rents on sites owned by them, where the prospect of socially-rented accommodation coming forward at these sites would prejudice the delivery of homes for staff who would potentially not be able to afford to live in the city: That is, where staff might not be able to access social rent tenures, but are still struggling to afford other tenures of affordable housing or accommodation in the private rental sector.

The policy allows those employers to help to address their own recruitment and retention issues by providing affordable housing on their own land. The sites would in effect be delivered as 100% affordable housing, but as the employer-linked tenure only, and only for staff for the specified employer(s). For most of the specified sites, employer-linked housing will only be one element of use on the site. For example, operational hospital uses would be retained on the hospital sites alongside staff accommodation, or teaching space will be retained alongside residential development. As such, the policy enables development of these sites as an additional contribution to housing need, that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff.

Monitoring of the LP2036 policy shows that affordable homes are being delivered in this way, such as at the John Radcliffe site, so the principle has been carried forward into Policy H4, following further engagement with key employers who have also expressed interest in delivering employer-linked housing on their sites.

H4 is not intended as an alternative to H2, it is a supplementary approach to be used only in specific circumstances. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

In summary, H4 reflects the evidence base and is an appropriate strategy given the specific circumstances and challenges of delivering affordable housing in Oxford.

Issue 3 – Dwelling sizes and accessible and adaptable homes – Policies H5 and HD11

Q1 Is the mix of dwelling sizes required by Policy H5 based on appropriate, available evidence, and does it apply to flatted development schemes?

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. An important element of this is the size of units available. Therefore, Policy H5 includes requirements in relation to the mix of dwelling sizes. The mix of dwelling sizes required by Policy H5 is based on appropriate, available evidence.

The Updated Housing Needs Assessment (2025, HEA.001), in Section 3, 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 the 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 the projection does not simply assume that an increase in single-person households will automatically translate into a need for smaller units. The issue of choice is less relevant in the affordable sector. The modelled mix of housing by size and tenure set for a capacity-led housing scenario is set out in Table 3.7 of HEA.001 and is as follows:

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

This mix has not simply been copied into the Policy. Partly, that is because a range is considered vital in order to give flexibility that can be applied appropriately in a range of different sizes and types of housing development. There are also many other 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.

The affordable housing mix set out in HEA.001 has been sense-checked by the City Council's Housing Team. Their greatest concern is much shorter-term than 2045 and in the shorter term there is a very large demand for smaller units. The different ranges set mainly include the percentages set out in HEA.001 as a point within those ranges, but the range is chosen to enable within it a reflection of the shorter-term need for smaller units. The two exceptions to the range including the point set out in HEA.001 are for affordable home ownership, which starts above the percentage set out in HEA.001 for 1 bed-units and stops just below the percentage point in HEA.001 for 4+ homes. This is a reflection of demand and what is known to be saleable

for this tenure, because products such as shared ownership do introduce a greater level of choice than rented affordable housing.

The policy only sets housing mix for the affordable housing element of the scheme. This is partly because affordable housing will be matched closely to the need, rather than it being a matter of choice. It is also important that there will continue to be the availability of a range of units to meet needs over time, with the greatest number being of the sizes that there is most need for and that there is expected to be most need for over the plan period.

That there is no set mix for market dwellings also allows a response to the market. However, the Policy does require that the proposed mix to be explained in terms of how it responds to site context, including local needs. This allows the mix to be tailored to the location and the type of site and specific proposal. It also means that the mix can reflect the most up-to-date information. The policy does also ensure there is more than one unit type coming forward, to ensure there is a continued variety of sizes.

The Policy approach also ensures a significant amount of flexibility by setting an appropriate threshold for when the stated affordable housing mix applies. It applies only to proposals for 25 or more homes. This ensures the ranges can actually be applied, as even for the smallest percentages (5%) at least 1 unit could be delivered (which would not be the case with a smaller threshold). Furthermore, employer-linked housing, and sites in the city and district centres are excluded from requirement to meet the stated mix. The mix of employer-linked housing will be most appropriately guided by the needs of the employer and staff. In city and district centres, sites are likely to be infill sites and the high-density requirement of 100 dwellings per hectare is likely to only be achieved with a preference for smaller units.

The exception set out for city and district centres is specifically because the high-density requirements in these locations will potentially lead to a requirement for smaller units in order to be achievable. The exception is not because these locations are more likely to provide flats (although they are). If flats are provided outside of these locations, they are likely to be a slightly lower density typology of flat and are expected to meet the mix requirement for the affordable housing element. There is no reason why flats can't be larger units, and those do exist already. If the nature of the flats proposed does make this unfeasible, then the policy allows this to be demonstrated.

Q2 What are the thresholds in Policy HD11 based on and are they justified, including the exceptions for flatted schemes up to three storeys or under 50 units?

Housing provision across the city should meet the needs of everyone, which means provision must be made for those with disabilities. As such, it is important to consider the demands and requirements people will have from their homes and how this may change over time. Homes need to be built with the flexibility to be adapted to the changing needs of residents. Adaptability is important to respond to changes to the size and compositions of households, and an ageing population.

Providing opportunities for residents to maintain their independence is important and can help to alleviate pressure on health and social care if older people can remain in their homes, adapted for their needs. In addition, housing needs to be adapted to support those with chronic health conditions and specialist housing needs.

Local authorities can adopt a policy to provide enhanced accessibility or adaptability through Requirement M4(2) Accessible and adaptable dwellings and/or M4(3) Wheelchair user dwellings in 'Approved Document M: access to and use of buildings.

The requirement for all affordable housing to meet the Category 2 standards (M4(2)) was based on the recognition that people who have restrictions on their mobility are more likely to be in need of affordable housing than the wider population. It also ensures equal availability in the housing allocations process, ensuring availability for the full range of households on the housing register, and avoiding exclusion.

The Census 2021 shows that 29% of households in Oxford have one or more people with a disability. Some of those households will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them. The Government has found that 34% of disabled people have had to make adaptations to their homes (see UK Disability Survey Report). Therefore, at least 15% of homes should be adaptable according to current needs. This was the percentage used for the market element of the requirement. The overall provision will be higher because of the affordable housing requirement, and therefore this will also accommodate an increase in disabled people over time.

Requirement M4(3) Wheelchair user dwellings in Approved Document M: access to and use of buildings allows local authorities to require through policy the provision of wheelchair user dwellings. These may be adaptable for wheelchair users M4(3)a, or they may be adapted for a specific requirement of an individual, which can then only be allocated through the local authority (M4(3)b). Policy HD11 requires that 5% of all dwellings for which the City Council is responsible for allocations or nominations, on sites of more than 20 dwellings, would be provided to Category 3 (wheelchair user) standards and these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation. As reported in the Updated Specialist Housing Needs Evidence (HEA.001), it is estimated that 3.6% of all households in Oxfordshire are wheelchair users currently. At 5% of dwellings on a scheme of 20 units (i.e. the threshold) this represents only 1 unit. Increasing the threshold is not a desirable approach in Oxford because of the small nature of sites.

Some typologies of development will not be suitable for providing homes that meet M4 requirements, in particular because accessible and adaptable homes require level access to the front door. This means that lifts are necessary if the dwelling entrance is not at ground floor level. Lifts have installation costs and ongoing maintenance costs (which are likely to affect residents' ground rents). This will affect viability both because of the costs of provision of the lift and the amount of space taken out of the development to have a lift shaft as well as stairs. There are also only so many dwellings per floor that can be served by one lift shaft. Therefore, a greater height of building and greater number of units will be required so that enough flats are served by one lift shaft to make the development feasible. It is understood that the critical mass

can be achieved at 3 storeys. Therefore, the Policy excludes flats of two storeys from the requirement.

The policy criteria are framed to ensure the requirement does not lead to a circumventing of the policy by proposing two –storey flats when other typologies would be more suitable to the site, and to ensure that if that is the justified typology, options for maximising provision of accessible and adaptable homes are explored, even if it is not possible to meet the full requirement.

Issue 4 – Loss of Dwellings – Policy H6

Q1 Is the approach in Policy H6 to the loss of dwellings justified, effective and consistent with national planning policy?

The approach is considered to be consistent with the Government's objective of significantly boosting the supply of homes, and the aim as stated in paragraph 61 of the 2024 NPPF to meet an area's identified housing need, including with an appropriate mix of housing types for the local community. The housing requirement set out in Policy H1 is a capacity-based housing requirement, which does not meet the Local Housing Need identified using the Standard Method. Given that needs cannot be met by provision of new homes within the city, it is very important that needs are not increased further by the loss of existing dwellings.

The approach of Policy H6 is therefore justified in the context of Oxford, where there is a capacity-based housing target. The capacity-based housing requirement (whilst there is a small buffer for non-delivery built into the calculation) means that anticipated supply must come forward in order to meet the Housing Delivery Test and also to maintain a 5-year supply of homes. The loss of units has a negative effect on calculation of supply, so it is therefore very important that this is avoided as far as possible.

A degree of clearly set out flexibility is also important to ensure the effectiveness of the Policy. This is because there are a few circumstances where a specific and discrete need for an exception in order to achieve some other very positive benefits can be easily anticipated. The flexibility in Policy H6 is specifically to allow facilities important to the local community to come forward. Even in these circumstances, the Policy H6 still ensures that conversion back to a dwelling in the future is still possible. The allowable flexibilities are clearly set out in criteria a-c. The uses that a dwelling could be lost to are clearly set out. These are all uses commonly found in converted dwellings, meaning that conversion back to residential, as required by criterion d, would be very possible, and also limiting options for converting to a different use in the future that is less necessary to the community and that wouldn't justify the exception.

Issue 5 – Houses in Multiple Occupation ('HMOs') – Policy H7

Q1 Given the local housing market context in Oxford and the affordability of property (referred to in the supporting text), is Policy H7 justified?

Policy H7 is justified. The 2024 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. As of 2 November 2026, there were 2,801 active licences on the Council's HMO register and this type of accommodation offers the only available and affordable solution for many people as renting individually or buying a property in Oxford is too expensive, so performs an important role in the city. In some areas of the city, however, the concentration of HMO has resulted in changes to the character of the local area and has led to local parking problems and large numbers of transient households.

The policy approach therefore is to be supportive of this type of housing, but to monitor this and provide some controls around the delivery of this type of home and management of the implications for local communities. Policy H7 seeks to do this by setting criteria to manage how and where new HMO will be permitted to come forward and to restrict HMO numbers in those areas where there is already a particularly high concentration of existing HMO. This will help to ensure that there does not become a worsening overconcentration of HMO in certain streets/ parts of the city.

The threshold based approach of development management for HMO is in the current Local Plan 2036 and also in previous planning policy documents. The City Council has for a number of plans struck a successful balance between facilitating this form of housing which is accessible to those who would struggle elsewhere in the market, and managing the potential implications of a concentration on local communities. Continuing this approach will manage HMO in a way that prevents an over-saturation or dominance of this type of housing within a street.

Q2 What is the justification for criterion b), which requires compliance with good practice guidance which falls outside the scope of the development plan?

HMO's form an unusually high percentage of houses in the city, partly as a result of the housing affordability challenges in Oxford, which mean that HMOs offer the only available and affordable solution for many people for whom renting individually or buying a property in Oxford it too expensive. With such high demand for HMOs, Policy H7 seeks to ensure that the quality of accommodation is not compromised. This is important because the demand for properties is high and so some landlords might offer lower quality properties but still be confident of finding tenants.

Whilst all HMOs granted a licence in Oxford must meet the prescribed standards set out in the Housing Act 2004 and associated regulations, the intention of the policy as drafted was to draw attention to the Oxford specific good practice guidance, as national space standards are only applicable to new dwellings. Applications for the conversion of C3 dwellings to C4 or Sui generis HMOs, are not required to meet the national standards and therefore these types of applications would not have been required to meet space standards if it were not for the Oxford specific good practice guidance. There are a significant number of this type of application in Oxford, and many have been refused where they have failed to meet the space requirements of the local guidance in terms of bedroom, kitchen and bathroom and bin storage.

The requirement for HMO development to comply with Oxford-specific local guidance is an established policy approach in Policy H6 in the Local Plan 2036 and has been implemented effectively in development management decisions since its adoption in 2020. However, on refection criteria b can be improved with some modifications as follows:

Proposed modifications:
b) All HMOs must have appropriate and adequate living accommodation and amenity as set out within Appendix 2.2. ~~The development complies with~~ Regard should be had to the City Council's good practice guidance on HMO amenities and facilities, or any equivalent replacement document.

And insert a new Appendix 2.2 (and amend the numbering of subsequent appendices):

APPENDIX 2.2 – GOOD PRACTICE GUIDANCE ON HMO AMENITIES AND FACILITIES

The following minimum space standards for HMOs will be required where occupiers share kitchen facilities:

Minimum bedroom size	Total number of people in HMO	Minimum kitchen size	1 to 2 storey HMO minimum living space	3+ storey HMO minimum living/ dining space
1 occupant 6.5m² or 2 occupants 10.22m²	3–5 people	7m²	11m² separate living room; or 18m² combined kitchen/living room (of which 7m² must be dedicated kitchen area)	**Either:** 11m² separate living room within 1 floor distance of kitchen; **or:** 18m² combined kitchen/living/dining room (of which 10m² must be dedicated to kitchen area).
	6–10 people	10m²	14m² separate living room; or 24m² combined kitchen/living room (of which 10m² must be dedicated kitchen area)	**Either:** 14m² separate living room within 1 floor distance of kitchen; **or:** 24m² combined kitchen/living/dining room (of which 10m² must be dedicated to kitchen area).
1 occupant 8.5m² or 2 occupants 14m²	3–5 people	7m²	No additional communal living space required	**Either:** 13m² kitchen/diner; **or:** 11m² separate dining room within 1 floor's distance of kitchen; **unless:** all bedrooms within 1 floor's distance of kitchen
	6–10 people	10m²	No additional communal living space required	**Either:** 16m² kitchen/diner; **or:** 14m² separate dining room within 1 floor's distance of kitchen; **unless:** all bedrooms within 1 floor's distance of kitchen

- The minimum kitchen area must be provided in all cases.
- A living room will be accepted as a dining room and vice versa, provided the minimum space requirements (given above) are fulfilled.

In addition to complying with the above table, the following notes will be considered when assessing room sizes:



- Any area of the room in which the ceiling height is less than 1.5m cannot be counted towards the minimum room size.
- When assessing room size, the Council looks at floor area in the room. Built in wardrobes (floor to ceiling) will be included in the calculation, however wardrobes not at floor level will be discounted, as shown in the photo (left).
- Communal space in other parts of the HMO cannot be used to compensate for bedrooms that are smaller than the legal minimum.
- Where a property is being extended/converted, it is expected that the minimum bedroom, kitchen and communal space requirements are provided.
- Where a property is being extended/converted, a minimum bedroom width of 2.15m will be required.
- The measured space in any room must be usable space. The room should be able to accommodate the required amount of appropriate furniture easily and still allow space for movement about the room. An ensuite would also be disregarded.

For HMOs with an element of sharing, the recommended capacity requirements for recycling and waste management are outlined in the table below:

Number of occupiers	Recycling			Refuse
	Indoor food caddy	Outdoor food recycling bin	Blue recycling wheeled bin	Green refuse wheeled bin
3	1 × 5 litre per kitchen	1 × 23 litre per property	1 × 240 litre	1 × 180 litre
4	1 × 5 litre per kitchen	1 × 23 litre per property	1 × 240 litre	1 × 180 litre
5	1 × 5 litre per kitchen	1 × 23 litre per property	1 × 360 litre	1 × 240 litre
6	1 × 5 litre per kitchen	1–2 × 23 litre per property	1 × 360 litre	1 × 360 litre
7+	1 × 5 litre per kitchen	1–3 × 23 litre per property	Contact the Recycling Team to determine your requirements	

Issue 6 – Homes for Travelling Communities and Boat Dwellers – Policies H10 and H11

Q1 What is the justification for Policy H10(a) and is it sufficiently clear what is required of app of applications for planning permission?

The most recent Oxfordshire-wide Gypsy and Traveller, Travelling Showperson and Boat Dwellers Accommodation Assessment, (2024, HEA.006a) and its executive summary (2024, HEA.006b) indicate that the current need for traveller pitches or yards in the city is zero. Oxford is a constrained city with competing demands over available sites; therefore, any available land is likely to be unviable for this type of use and will inevitably be delivered for more viable, competing development types. The drafted wording of criterion a was intended to provide an element of flexibility and positive wording to the policy approach. However, on reflection, it would be difficult for an applicant to demonstrate that there is a need for this type of development when the latest up-to-date and comprehensive evidence (HEA.006a) indicates otherwise. All the other criteria allow applications to be assessed should they be submitted and provide a suitable framework for determining planning applications. Consequently, we suggest that criterion a is deleted from the policy.

To address this, the Council suggests the following modification to the policy:

~~*a) The applicant or updated City Council evidence base has adequately demonstrated a clear need for the pitch/yard in the city, and the number, type, and tenure of pitches/yards proposed, which cannot be met by a lawful existing or available allocated site; and*~~

Because of the above deletion, all remaining criteria in the policy will need to be renumbered ‘a)’ to ‘e)’ respectively.

Q2 What is required of Policy H10(f) insofar as the management of sites is concerned? How does this differ from other forms of residential development?

Unlike conventional residential development, gypsy and traveller sites are uniquely structured environments that require deliberate spatial design. Pitch layouts are open and rely on shared communal spaces and utility blocks rather than defined, fenced gardens. Poorly located sites can easily become isolated or visually exposed, making sensitive screening and proximity to services critical. Criterion (f) of Policy H10 therefore reflects the expectations set out in government policy at paragraph 13 criterion (a) of Planning policy for traveller sites which states that planning policy should promote peaceful and integrated co-existence between the site and the local community. Furthermore, many pitches may also include work or storage areas for commercial vehicles, tools or equipment alongside residential pitches, and this unique combination requires careful location planning to prevent noise, visual intrusion, or highway safety issues that do not arise in standard housing. Criterion f is justified in this regard, however it is considered that it is not prescriptive in how these issues are dealt with, leaving flexibility for

the applicant; nor is it overly demanding, it would not require expensive solutions which would add cost to proposals.

Issue 7 – Older Persons Accommodation – Policy H12

Q1 Is Policy H12 justified, effective and positively prepared in seeking to promote older persons and specialist accommodation types?

The NPPF lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a wide variety of different housing types to support the elderly and those with additional needs. Nationally, the population is ageing and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8% in the South East), the population of those 65+ in Oxford is expected to grow 36%-39% by 2045 (representing 7,336-7,950 additional people in this age range). Therefore, it is important to ensure that the needs of older people are considered.

A modification was proposed in response to Matter 2, Issue 5, Question 1 to include the need for sheltered/retirement housing and extra care units within the 'Policy Context' supporting text to Policy H9 to ensure effectiveness.

The approach of Policy H12 is generally supportive and permissive. However, the Policy approach also sets out a set of clear criteria to ensure the provision is suitably located and delivered to ensure a good standard of living. People in this housing type may have limited mobility and it is important it is located in accessible locations with access to facilities so that people do not become isolated.

The City Council has worked closely with Oxfordshire County Council in this regard due to their statutory legal responsibility for assessing and arranging care; they are content with the approach of Policy H12.

Q2 Does the Plan make adequate provision to ensure that needs are met?

Designing a policy approach that can with certainty ensure that Oxford's needs for older persons housing is challenging in Oxford. This is the case because of the compact nature of the city, its viability profile, its significant variety and levels of need and demand for other uses and housing types and the lack of identifiable, suitable sites. These characteristics create a number of effects that make a simple requirement and provision difficult:

- Older persons accommodation requires a critical mass of about 60 rooms in order for it to be feasible to run. There are few sites in Oxford of a size that could accommodate this.
- This means that a policy approach that requires part of larger sites to deliver this use is also not feasible, as there are even fewer sites that could possibly have potential for a small portion of them to deliver this kind of housing. This would also be competing with other needs for other types of accommodation, such as self-build housing, general market housing, student accommodation and general affordable housing.

- The call for sites forms have offered older persons accommodation as an option but there is not interest in this sector that would enable a site allocation exclusively for this use.

Therefore, the policy approach set out in H12 is generally supportive of this use, without setting any requirement. Criteria are set to ensure what comes forward creates a suitable living environment for end users.

The approach was discussed with the County Council through the plan-making process and they agree it is the most suitable approach for Oxford. It is expected that this need will partially be met close to but outside the city council area, as provision for older persons accommodation is already being proposed and permissioned on sites for Oxford's unmet housing need in neighbouring authority areas. This type of accommodation does come forward in Oxford but it is difficult to calculate a windfall rate because of the sporadic nature of delivery.

Year	**Housing type**		**Total dwellings completed (net)**
	Care Home Rooms Completed (Number of equivalent 'dwellings')	**Other communal accommodation Completed (Number of equivalent 'dwellings')**	
2016/17	-6 (-3)		419
2017/18	64 (21)		367
2018/19	36 (20)		358
2019/20	59 (33)		790
2020/21	0 (0) *		717
2021/22	-13 (-7)	34 (19)	581
2022/23	0 (0)	57 (32)	554
2023/24	0 (0)	-18 (-10)	365
2024/25	0 (0)	0 (0)	272
2025/26	*0 (0)*	*0 (0)*	*700*
TOTAL:	**76 (43)**	**73 (41)**	**5123**

Issue 8 – Self Build and Custom Housebuilding – Policy H13

Q1 Is Policy H13 justified, effective and consistent with national planning policy?

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

The self build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self build housing to come forward. Whilst the high land values in Oxford mean that the provision of self build plots or community housing isn't likely to really be an affordable housing model/ affordable way to access housing, the approach of Policy H13 is generally supportive and permissive.

The policy identifies a set of clear criteria to ensure the provision of self and custom build plots are suitably located and delivered to ensure a good standard of living. The threshold only applies to sites of 100 homes or more in order to avoid potential adverse impacts on the design/layout of the site. A time limit is specified within the policy so that if the plots do not sell they can still be bought forward with the rest of the site. In this regard the policy is considered to be effective.

It is acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, but it has been incorporated within Policy H13 rather than as a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

Issue 9 – Boarding School Accommodation Policy H14

Q1 What is the justification for requiring boarding school accommodation to be on or immediately adjacent to the main teaching campus of the school the children will attend?

The Council's position is that boarding school accommodation should be located on, or immediately to, the main teaching campus because of the particular operational and safeguarding requirements associated with accommodating school-aged children, who are under the age of 18. Close physical proximity enables effective supervision and pastoral care, ensures pupils can safely access educational facilities throughout the day and prevents generating additional travel demands.

If boarding school accommodation is located at a significant distance from the teaching campus, additional measures are typically required to transport pupils between the accommodation and school. This can result in increased vehicle movements, including the use of minibuses, with associated transport, congestion and environmental impacts. Locating accommodation adjacent to the school therefore helps minimise unnecessary travel and supports more sustainable patterns of movement and no need of a bespoke management arrangement.

The importance of retaining suitable sites for market housing versus boarding accommodation must also be considered in the context of Oxford's constrained land supply, as highlighted in our strategic strategy and emphasised as one of the main objectives. Whilst the number of sites coming forward for boarding accommodation may be relatively limited, the loss of such sites can nevertheless be significant given the scarcity of viable development opportunities within the city. Recent planning permissions in the North of Oxford (22/02661/FUL and 23/02411/FUL) saw the loss of dwellings and land that could have been used for market housing. In the context of a Plan which seeks to identify and secure every opportunity for the delivery of housing, it is considered that the loss of further potential housing sites to a use which is neither a priority for the Plan nor required in government policy, ought to be mitigated as Policy H14 seeks to do.

It is acknowledged that, in some cases, proposals for boarding accommodation may provide replacement dwellings and therefore result in no net loss of residential units. However, the opportunity cost remains relevant and something Oxford is experiencing and is subject to recent pre-application conversations. Furthermore, the Council's experience in determining recent applications for boarding accommodation has demonstrated the need for a dedicated planning policy which addresses this point. Without a specific policy framework, there is less certainty regarding the assessment of proposals and the consideration of key issues such as location, operational requirements and safeguarding. The policy has therefore been included to provide a clear basis for decision-making and to support the consistent determination of future applications, it has also been designed to throttle demand and restrict these developments to ensure housing and sites are protected.