



UNDERSTANDING DATA

CAPACITY ASSESSMENT OF OXFORD CITY

South Oxfordshire District Council &
Vale of White Horse District Council

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Project Version Control

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1. Introduction

Overview

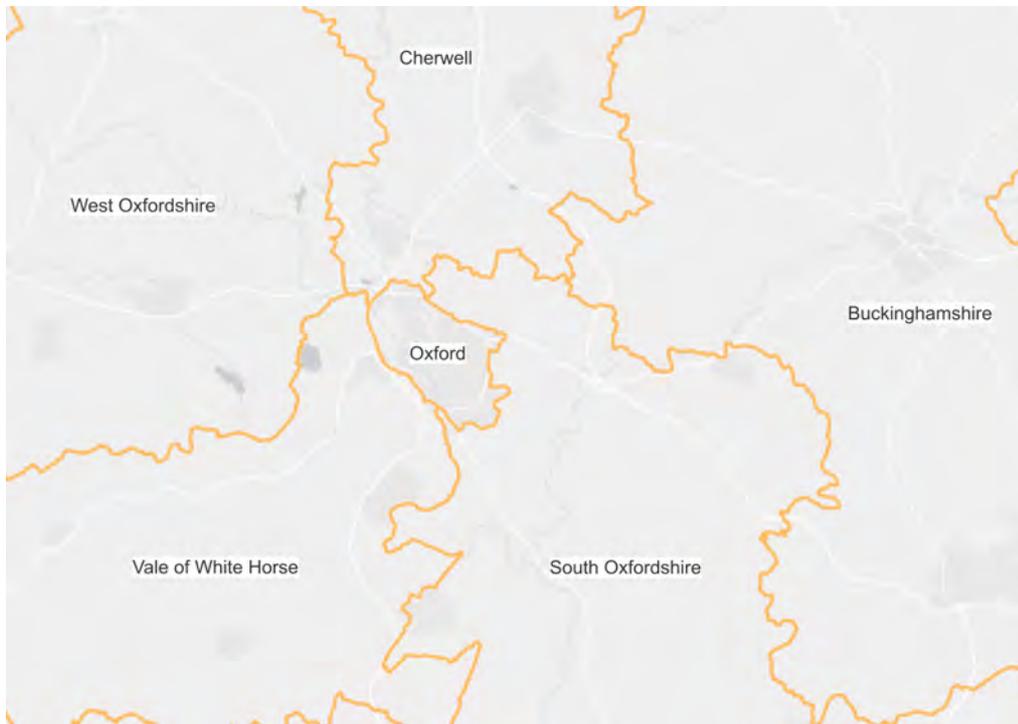
- 1.1 Chilmark Consulting Ltd (**CCL**) working with Understanding Data Ltd (**UDL**) were instructed by South Oxfordshire District Council (**SODC**) and Vale of White Horse District Council (**VOWHDC**) in November 2023 for the preparation of an assessment and review of the housing capacity of neighbouring Oxford City (hereafter the 'Oxford Capacity Review').
- 1.2 CCL is a RICS Registered firm of chartered town planners, housing, town centre and economics specialists founded in 2013 and working across the UK.
- 1.3 UDL was founded in 2015 and provides expertise and advice around the use and analysis of spatial data with a focus on demographic change, housing market conditions and housing need and economic trends.

Context

Location

- 1.4 Oxford City is a local authority within Oxfordshire County. Figure 1.1 below shows the broad location and boundaries of the City.
- 1.5 The City shares boundaries with Cherwell District to the north, with West Oxfordshire District, the Vale of White Horse District to the south-west and with South Oxfordshire District in the south and to the east of the City.

Figure 1.1: Oxford City, Broad Location



Source: UDL and CCL, 2023 created in QGIS using ONS boundaries

- 1.6 The Oxfordshire local authorities have shared a joint, cross boundary approach to strategic planning matters including housing, economic development and infrastructure provision over many years.

Housing Needs

- 1.7 Previously, the Oxfordshire SHMA (2014) identified how much new housing was needed in the County and for each constituent local authority area. The SHMA identified a significant increase in housing needs overall for Oxfordshire and particularly for Oxford City. The subsequent various Local Plans prepared by the individual Oxfordshire local authorities resulted in strategic planning policies and significant site allocations to accommodate housing needs arising from Oxford City that the authority was unable to meet (the 'unmet housing need').
- 1.8 Oxford City Council (**OCC**) is in the process of preparing a new Oxford Local Plan. The new Plan has an updated vision, objectives, policies and proposed development site allocations for the period 2020 – 2040.

1.9 A Regulation 18 draft Preferred Options Local Plan was published for consultation in September 2022, and a special consultation on housing need was held between February and March 2023. The City Council have now published the Regulation 19 Pre-Submission Draft Plan in November 2023 for a further period of consultation until January 2024.

1.10 At Section 1 the new Oxford Local Plan identifies an overarching vision that includes the City becoming:

“a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper”.

1.11 The Plan articulates the following six themes for the City:

- Oxford will be a healthy and inclusive city to live in;
- Oxford will be a fair and prosperous city with a globally important role in learning, knowledge and innovation;
- Oxford will be a green and biodiverse city that is resilient to climate change;
- Oxford will be a city that utilises its resources with care, protects the air water and soil and aims for net zero carbon;
- Oxford will be a city that respects its heritage and fosters design of the highest quality; and
- Oxford will be a liveable city with strong communities and opportunities for all.

1.12 OCC has prepared a Housing and Economic Needs Assessment (**HENA**) with Cherwell District, and a Housing and Economic Land Availability Assessment (**HELAA**) together with an interim and updated Employment Land Needs Assessment (**ELNA**) to support the new Local Plan. These studies together offer the most recent evidence of future housing needs and the potential supply of land to accommodate housing and employment land requirements arising.

- 1.13 The emerging Oxford Local Plan: 2040 has a stated priority (see Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development) to prioritise the capacity for new housing development in Oxford.
- 1.14 Draft Local Plan policy H1 (Housing Requirement) identifies a total housing need (derived from the HENA study) of **1,322** dwellings per annum (**dpa**) (**26,440** dwellings in total over the period 2020 – 2040).
- 1.15 Policy H1 confirms the total planned provision of housing land (comprising both site allocations, completions from 2020/21 – 2022/23 and a windfall site development allowance) for a total of **9,612** dwellings (**481** dpa) over the period 2020 - 2040.
- 1.16 The total supply proposed represents some 36% of the total identified need, with the remainder anticipated to be considered as an unmet housing need.
- 1.17 Consequently there is a significant gap between the total housing need for Oxford and the planned provision set out in draft Policy H1 of the Local Plan (amounting to some **16,828** dwellings or **841.4** dpa). The Local Plan indicates that Oxford want (see paragraphs including 2.3 and 8.7) the unmet need to be met by additional housing provision within the surrounding Oxfordshire local authorities in an Oxfordshire strategic housing market area.
- 1.18 The Plan shown below at Figure 1.2 is extracted from the Oxford Local Plan: 2040 from Figure 8.2. It identifies the location of existing, allocated sites for unmet housing needs located outside Oxford City, including several sites that are immediately adjoining the City's administrative boundary.

Figure 1.2: Existing Allocated Sites Supporting Oxford’s Unmet Needs Outside the OCC Boundary

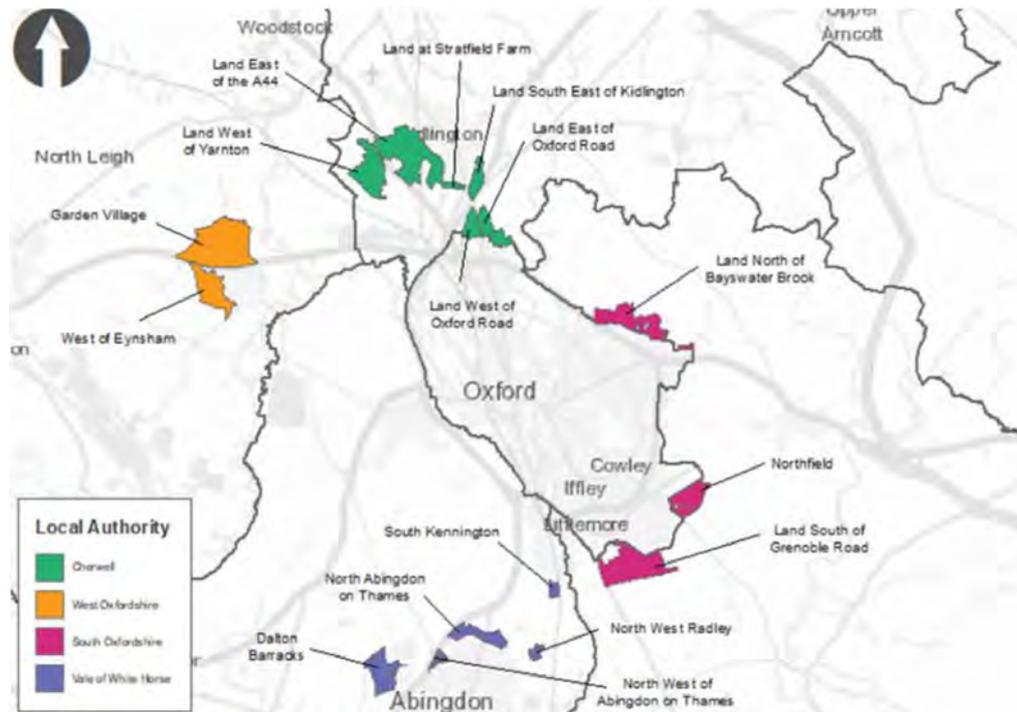


Figure 8.2 Allocated unmet need sites outside of Oxford boundary

Source: Extract from Oxford Local Plan: 2040, Figure 8.2

Purpose and Scope

- 1.19 The aim and objectives of the Oxford Capacity Review are to prepare an objective assessment of the capacity for housing in the Oxford City Local Plan area.
- 1.20 The main objectives and outputs sought from the commission include testing the extent to which the housing land supply capacity in Oxford City has been maximised to support the delivery of new dwellings anticipated in the draft Oxford Local Plan: 2040. It requires an assessment of the evidence base to review the extent to which *inter alia*:
- the assumptions and methodology used in the Oxford Housing and Employment Land Availability Assessment are robust;

- the consistency, depth and robustness of conclusions drawn on the suitability, availability and achievability of proposed and rejected housing sites;
- if alternative approaches to development on sites could make them appropriate for inclusion in the future housing land supply; or increase the capacity of those sites proposed for housing allocation;
- there is additional land / sites with capacity for housing within Oxford's boundary (i.e. sites that have not previously been considered or reviewed);
- the assessment is consistent with the Oxford Local Plan: 2040's objectives to prioritise housing development;
- the Local Plan policies support the accommodation of more housing within the City's boundaries.

1.21 The capacity review assessment is to assist SODC and VOWHDC in discharging the legal Duty to Cooperate in preparing their joint Local Plan, and informing any soundness representations that may be required to be submitted during the Regulation 19 consultation.

Data Sources, Assumptions and Limitations

1.22 The principal assumptions and limitations are recorded in more detail in each of the relevant sections of the report. The analysis, advice and findings must therefore be read in the context of the assumptions and limitations concerning available information and the level of analysis possible.

1.23 In more detail, the overarching assumptions and limitations are as follows:

- site level data was provided in a format that allowed for interrogation via QGIS and included Oxford City's Housing and Employment Land Availability Assessment (**HELAA**) housing sites (those proposed for allocation and those not selected) and employment sites. Local Plan policy designations and physical constraints data were sourced from Oxford City Council via the Client at the agreement of Oxford City. Digital

boundary data was sourced from the Office for National Statistics, Ordnance Survey, Natural England and the Environment Agency. This was supplemented with aerial photography within QGIS cross referenced from Google Earth Pro and relevant Ordnance Survey base-maps;

- information and data provided to CCL and UDL has been used in good faith as to its completeness and accuracy. Where, upon checking and review there have been identified data gaps or issues these have been raised as appropriate with the originator of the data / information in question; and
- no physical site visits have been undertaken as part of the work.

Report Structure

1.24 Following this introduction, the Report is structured into five main sections as follows:

- **Section 2:** Oxford Housing and Employment Land Availability Assessment – examines the assumptions and methodology used in the Oxford City Housing and Employment Land Availability Assessment;
- **Section 3:** Other Potential Additional Sources of Housing Land Supply – this section is concerned with whether there are other potential sources of housing land supply and capacity in Oxford that have not been fully considered or examined in the Local Plan or its evidence base;
- **Section 4:** Proposed Housing Site Allocations – considers the Oxford Local Plan: 2040 proposed site allocations in more detail, including the process of selecting sites from the available HELAA, Sustainability Appraisal and Design Capacity Assessment analyses;
- **Section 5:** Planning Policy considerations – provides a review of the proposed Local Plan: 2040 policies that are relevant to the supply of housing delivery. It considers the extent to which the policies are sufficiently positive, proactive and flexible to ensure that housing delivery

and site capacities are maximised in the context of securing sustainable development;

- **Section 6:** Conclusions and Recommendations – draws the analysis and findings of the preceding sections together to identify a series of key conclusions and thoughts on recommendations for action; and
- **Appendices A1 and A2** – provide summary tables of rejected HELAA sites that can be reappraised; and a list of sites that were not included in the HELAA process but could be capable of providing housing development opportunities.

2. Oxford Housing and Employment Land Availability Assessment

Introduction

- 2.1 In this section we review the Oxford Housing and Economic Land Availability Assessment (**HELAA**) with respect to the approach, methodology, assumptions and process undertaken. The conclusions and outputs reached from the HELAA process are then evaluated further Section 3.

Overview of the Oxford HELAA

- 2.2 The Housing and Economic Land Availability Assessment was first prepared by Oxford City Council in September 2022 with a further, updated, version published in September 2023 (HELAA 2023).
- 2.3 The HELAA 2023 updates the identification and review of housing land and sites with a base date of 2020 (to correspond with the Oxford Local Plan: 2040) and uses completions monitoring data to September 2023.
- 2.4 The HELAA 2023 assessed **479** sites in total (see paragraph 3.0.2).
- 2.5 Total housing supply is stated to be **9,612** dwellings (including 10% non-implementation buffer) (see HELAA paragraph 3.02. et seq.). Table 2.1 below summarises how the total is derived.

Table 2.1: Total Housing Supply, Oxford City from HELAA 2023

	Supply Source	Dwellings	Cumulative Total
1.	Completions 2020/21 – 2022/23	1,846	1,846
2.	HELAA sites identified as suitable, available and achievable (10+ dwellings) (including 10% non-implementation discount)	5,870	7,716
3.	Estimated contribution from small sites (<10 dwellings with planning permission)	272	7,988
4.	Windfall site development contributions (116 dpa x 14 years)	1,624	9,612
Total		9,612	9,612

Source: Oxford City HELAA, September 2023

Relevant National Policy and Guidance on Housing Land Assessment

- 2.6 The National Planning Policy Framework (September 2023) (**NPPF**) establishes requirements for plan-making planning authorities to produce an assessment of the land in their area through the preparation of a strategic housing land availability assessment to establish the realistic supply and mix of housing sites.
- 2.7 The NPPF also identifies the importance of ensuring a minimum five years' worth of deliverable housing sites and appropriate supply buffers.

2.8 Paragraph 68 states that:

“Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

(a) specific, deliverable sites for years 1 to 5 of the plan period; and

(b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”.

2.9 Paragraph 74 is concerned with housing delivery trajectory and the need to identify a supply of specific, deliverable sites sufficient to provide a minimum of five years’ worth of housing:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan⁴⁰, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply”.

2.10 The National Planning Practice Guidance (**PPG**) provides more detail and guidance for the preparation of housing and economic land availability assessments at Section 3.

2.11 The PPG describes at ID 03-001 the purpose of housing and economic land availability assessments as:

“An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking”.

2.12 The PPG’s methodology for the production of assessments is then detailed in paragraphs ID 03-006 to 03-026 establishing a methodology, summarised as:

- **Stage 1: Site / Broad Location Identification** – determining the assessment area and site size; desktop review of existing information; call for sites; site location survey;
- **Stage 2: Site / Broad Location Assessment** – estimating the development potential (suitability, availability and achievability) and overcoming constraints;
- **Stage 3: Windfall Assessment** – determining the development potential of windfall sites;
- **Stage 4: Assessment Review** – review of the assessment and the preparation of a broad trajectory with the key question being the extent to which there are sufficient sites or locations for housing identified; and
- **Stage 5: Final Evidence Base** – drawing together the analysis and evidence together with a monitoring framework and identification of the deliverability (five year supply) and longer term developability supply.

2.13 The PPG does provide (see paragraph ID 03-004) for local authorities to depart from the methodology set out but states that it will be important to explain the reasons for doing so:

“This guidance indicates what inputs and processes can lead to a robust assessment of land availability. Plan-making bodies are expected to have regard to the guidance in preparing and updating their assessments. Where they depart from the guidance, it will be important to explain the reasons for doing so when setting out the evidence base that informs the plan. Assessment needs to be thorough but proportionate, building where possible on existing information sources outlined within the guidance”.

Oxford HELAA Method and Key Assumptions

- 2.14 The Oxford HELAA 2023 confirms at paragraph 1.2.1 that it fulfils the requirements set out in the NPPF and the PPG (outlined above) for the preparation of housing and economic land availability assessment.
- 2.15 In Oxford City’s case the HELAA methodology has been developed and applied in the context of the Oxfordshire Joint HELAA methodology. It states that it follows the joint methodology but also reflects the local circumstances pertinent to the City.
- 2.16 The HELAA explains its approach and method, including the key assumptions underlying the assessment in Section 2.
- 2.17 Our review of the stated method and assumptions used in the HELAA as set out below identifies that the overall approach is not consistent with national policy and practice.
- 2.18 The HELAA:
- considers sites with potential for housing over **0.25 Ha** or capable of delivering **10+** dwellings; it includes economic uses of **500+ sq.m**;
 - treats sites of nine or fewer dwellings as part of the windfall allowance;
 - includes sites from a range of sources including: previous housing land availability assessments; new sites that have been added from a Call for Sites process in 2021 and Local Plan consultations; planning permissions and applications; and officer-identified sites;

- excludes from assessment sites that are undeveloped Flood Zone 3b (previously developed sites in Zone 3b are included); Special Area of Conservation (SAC); Sites of Special Scientific Interest (SSSI); and Town Greens that have statutory protection against development; and
 - includes other brownfield and greenfield sites including those in the Green Belt, open air sports facilities, green infrastructure areas and corridors, Local Wildlife Sites and City Wildlife Sites and corridors.
- 2.19 The HELAA assesses whether sites included in the assessment are suitable, available and achievable (viable) for development. The capacity figures provided represent net additional dwellings.
- 2.20 It categorises appropriate sites as deliverable (the first 5 years of plan period) or developable for years 6-10 and 11-15 (these timescales are set out in Appendices B and C of the HELAA).
- 2.21 In more detail there are elements of the method or assumptions that are worth further exploration:

Sources of Sites

- 2.22 Paragraph 2.1.1 of the HELAA identifies that a range of various sources of information for potential housing sites were used including:
- a Call for Sites undertaken in 2021 and open since then;
 - sites promoted through the earlier stages of public consultation on the Local Plan: 2040;
 - review of previous work undertaken on the former Oxfordshire Plan, 2050;
 - desktop sources.
- 2.23 The PPG is clear at paragraph ID 03-008 that:

“The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land”.

- 2.24 Many sites are included but our own review has identified some that appear to have been missed and these are set out in more detail in Section 3 below.

Site Size Thresholds

- 2.25 Paragraph 2.1.2 of the HELAA confirms that a site size threshold of 0.25 Ha or greater has been applied. Sites below the threshold are taken into account in the windfall housing calculation unless there is evidence that they could deliver 10+ net dwellings.

- 2.26 The HELAA indicates that this is typical of the nature of sites in Oxford as many are small infill or conversion opportunities that typically come forward as windfalls rather than promotion by landowners in advance.

- 2.27 The site size threshold broadly accords with national policy and practice although it is noted that the PPG at ID03-009 considers that:

“It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings”.

- 2.28 The same paragraph also states that Plan-makers may wish to consider alternative site size thresholds and that the NPPF expects (see paragraph 69 (a)) that land is identified to accommodate at least 10% of the housing requirement on sites no larger than one hectare.

- 2.29 In the circumstances of a predominance of smaller infill and conversion sites that the Oxford HELAA describes and with regard to the PPG and the NPPF it is questioned whether a smaller site size threshold (5+ net dwellings) would be a more appropriate starting point for the identification and then subsequent allocation of housing sites. For example and by way of contrast, the HELAA for South and Vale, despite covering two large Districts with many villages containing smaller infill and conversion opportunities has a threshold of 5 or more dwellings with an area of 0.25 hectares.

- 2.30 This is reflected in the HELAA and the draft Local Plan’s conclusion that there is a substantial level of windfall capacity (sites of nine or fewer net additional dwellings) which are essentially un-planned and ad-hoc in nature.

Approach to Particular Types of Land / Sites

- 2.31 The HELAA describes its approach to assessment of various types of land and sites. These have been reviewed and the following sub-sections set out those where we consider there are issues arising.

Flood Risk Zones

- 2.32 The NPPF and PPG are clear as to the extent to which areas at higher risk of flooding should be developed with increasing restraint in national policies for housing in higher category flood zone areas.
- 2.33 The HELAA includes sites in Flood Zones 1 and 2 and states that there is a bespoke approach following agreement with the Environment Agency with respect to potential sites in Flood Zone 3.
- 2.34 The outcome of the bespoke approach is that existing developed sites within Flood Zone 3b can be considered for “*very careful re-development*” according to paragraph 2.1.8 of the HELAA. The Local Plan includes policies to ensure an improvement in the flood risk situation in such locations where the overall built footprint is not increased and existing flood storage is not lost.
- 2.35 Previously developed sites in Flood Zone 3b are not therefore excluded from the HELAA.
- 2.36 The HELAA also considers, at paragraph 2.1.9 the approach to how sites that are currently within Flood Zone 3 but will benefit in future from the construction of new flood defences (such as the Western Conveyance Channel as part of the wider Oxford Flood Alleviation Scheme - **OFAS**¹).

¹ The Oxford Flood Alleviation Scheme is subject to determination of a planning and Compulsory Purchase Order inquiry commencing on 14th November 2023. The overall aim of the OFAS is to reduce the flood risk to homes and businesses to the west and south of the city of Oxford. It will also provide greater flood protection for key local infrastructure, principally the Botley Road, Abingdon Road and main railway line which runs through Oxford. It will also improve the resilience of key utility services in the city including the sewer network and electricity supply and make them less vulnerable to disruption in future floods.

- 2.37 It is understood that the OFAS's overall purpose is to reduce flood risk to the benefit of existing properties and infrastructure in the City rather than open up areas for new housing development. Therefore the proposed construction of the OFAS is not used within the HELAA as the basis to bring potential land into scope as suitable housing sites.
- 2.38 Given the benefit in reducing fluvial flood risk that the implementation of the OFAS works would provide during the Local Plan: 2040 period it is questioned as to whether a more positive approach could be taken to unlocking potential future development land from Flood Zone 3 areas where the flood risk modelling including the effects of the OFAS defence works would ultimately reduce the flood risk of those areas.
- 2.39 Put simply, an alternative approach to the impact of the OFAS works on flood risk for future development could realistically be considered (and evaluated) as the improved protection of land in the south and west of Oxford from flooding is the objective of the scheme and this needs to be evaluated in the context of the future housing needs of the City.

Green Belt

- 2.40 The HELAA notes correctly that Green Belt is a policy designation rather than an intrinsic characteristic of the area and therefore the boundary is capable of being altered. The NPPF allows for the review and alteration of Green Belt boundaries in exceptional circumstances through the Local Plan-making process (NPPF paragraph 140).
- 2.41 The HELAA explains at paragraphs 2.1.13 – 2.1.15 that much of the Green Belt within Oxford is formed of the river corridors which are also designated for nature conservation or green / blue infrastructure value.
- 2.42 The latest Green Belt Assessment (2023) assessed Green Belt parcels but not those where there was an intrinsic reason for their protection in addition to the

The scheme involves the construction of a new river channel, between the A34 to the west and the railway to the east, to the west of Oxford city centre. The channel will extend for a length of approximately 5km, south-easterly from the confluence of the Botley and Seacourt Streams lying approximately 0.6km north of Botley Road, to just south of Kennington.

Green Belt designation. The HELAA records such intrinsic reasons at paragraph 2.1.14 as - because sites are playing pitches, public open space, of biodiversity value, functional flood plain or where the landowner's intention is not to develop the site.

- 2.43 As a result, nine sites were reassessed to update results from the previous Green Belt Assessment in 2017 and 2018; and a further 10 new sites were appraised. The conclusion drawn at paragraph 2.1.15 is that there will be no review of the Green Belt boundaries through the Oxford Local Plan: 2040:

“Nearly all sites in the Green Belt (2023) assessment were assessed to have a moderate-high or high negative impact on the Green Belt if they were to be removed. The negative impacts their removal would have on remaining Green Belt are not considered to be outweighed by the need for housing, therefore none of these sites are proposed for removal from the Green Belt in LP2040”.

- 2.44 The approach to Green Belt sites appears to be narrowly focused through the HELAA and Green Belt appraisal work. The Green Belt evidence base is spread over a number of separate assessments of sites conducted at different times which requires considerable cross-reading over a number of different documents and piecing the evidence together from each rather than having a comprehensive Green Belt analysis for the Pre-Submission Draft Local Plan drawn together in one up-to-date document.
- 2.45 There are also appears to something of a contradiction in the various Green Belt assessments that no exceptional circumstances for Green Belt release exist in Oxford and yet the City Council anticipates that unmet housing needs arising from Oxford will be accommodated on land outside Oxford boundaries that may fall within the same Green Belt.

Employment Sites: Categories 1 – 3

- 2.46 Paragraph 123 (a) of the NPPF envisages using employment land for homes in areas of high housing demand where it would not undermine key economic sectors or sites.

- 2.47 The HELAA's assessment of employment land for the delivery of residential development is laid out in paragraphs 2.1.27 – 2.1.31.
- 2.48 The existing Local Plan: 2036 and the emerging Local Plan: 2040 seek to protect and nurture existing defined employment land and sites which are categorised into those that support national and regional knowledge economy sectors or are significant employers (Category 1), locally important services sites (Category 2) and smaller, poorly located sites that do not perform an important economic function or are unlikely to be able to in the future (Category 3).
- 2.49 The Local Plan does not propose to allocate new strategic employment sites but supports the intensification and modernisation of existing sites to meet employment floorspace needs to 2040.
- 2.50 The draft Local Plan: 2040 introduces what it claims is a more permissive approach (through Policy E1) to allow an element of residential development on employment sites where this would not prejudice the employment or operational use of the site.
- 2.51 Paragraph 2.1.31 of the HELAA methodology states that all employment sites with the potential to deliver housing have been included in the assessment. The approach uses the Employment Land Needs Assessment study (2022) prepared by consultants Lichfields for OCC as the basis for considering Cat 1 and Cat 2 employment sites but there is no publicly available evidence that the Cat 3 sites have been similarly assessed.
- 2.52 There is also no clear evidence as to the realistic capacity for residential development within the Cat 1 and Cat 2 employment sites assessed and in many cases such sites are rejected for residential development through the HELAA analysis on the basis of landowner intentions and therefore lack of availability.
- 2.53 The extent to which the HELAA approach has fully and effectively assessed the realistic potential for residential re-development on existing employment sites and particularly the lower grade Category 3 land is questionable and does not appear consistent with the objectives of the NPPF at paragraph 125. No

systematic analysis of the constraints (and mechanisms to overcome these) have been considered for sites that are then rejected from the HELAA. This is despite the obvious opportunities to proactively identify actions and mechanisms to re-use low grade employment land and particularly sites that are within largely mature residential neighbourhoods and district centres.

Open Air Outdoor Sports Facilities

- 2.54 With respect to open air sports provision (private or publicly owned), paragraph 2.1.20 et seq. of the HELAA sets out the approach taken to their inclusion in the assessment and the basis for analysis.
- 2.55 The HELAA recognises that outdoor sports facilities are protected in the existing Local Plan as well as the emerging draft Local Plan: 2040. The NPPF also provides for the protection and promotion of sporting and recreational needs (paragraphs 93 and 99).
- 2.56 The Local Plan: 2040 and the HELAA rely upon the draft Oxford Playing Pitch and Outdoor Strategy 2022 – 2036 which assesses the existing and future need for playing pitch provision, concluding that there is a need to protect outdoor sports facilities but also to enhance provision through greater community access and intensification of use of existing sports and recreation space, not least the extensive areas and facilities in the ownership of the various University colleges.
- 2.57 The draft Playing Pitch Strategy notably does not assess the needs for golf courses and golf facilities which is important in the context of future land use and effective utilisation of land in Oxford given there are some substantial areas of golf course land within the urban area of the city.
- 2.58 The Strategy has not been published with the evidence base for the Local Plan and appears to remain in draft form. It is also plainly only covering the period up to 2036 rather than the Plan period 2020 – 2040. The reliance placed on the draft Strategy therefore raises questions as to why it has not been finalised and published as key evidence to the Plan and also whether and how the Council intends to act upon the Strategy's recommendations for securing greater intensification of use and access to existing facilities.

- 2.59 The HELAA assessments of sports pitches shows that where they have been assessed they are almost always rejected on the basis of suitability or availability.
- 2.60 There are clearly opportunities to allow for the re-development or partial re-development of more of these sites, as well as giving proper consideration to land swap opportunities to release sites (including possibly land within Green Belt within or outside Oxford where leisure and sports uses are not inappropriate forms of development). The opportunity for re-development for residential is demonstrated in the Local Plan's proposed allocation for re-development of at least one existing sports playing pitch site (Lincoln and Jesus College HELAA sites 026 and 032).
- 2.61 In our view there is a lack of consistency and clarity as to how sports pitches have been assessed for development in the HELAA. It is not clear how the HELAA has utilised the evidence available consistently and particularly where the evidence relied upon is within a draft, unpublished, strategy that does not cover the whole Local Plan 2040 plan period.

Allotments

- 2.62 The importance of allotment space is identified in the NPPF at paragraph 92 (c) achieving healthy, inclusive and safe places. Oxford Local Plan policies provide for the protection of existing allotments and restricts their loss although it allows for re-provision (highlighting that there are limited opportunities to do so within the City Council's area).
- 2.63 The HELAA indicates at paragraph 2.1.25 (although does not identify the specific evidence for this) that the majority of allotment sites have waiting lists which illustrates the high demand that exists. This information should be published to justify the analysis in the HELAA. Allotments are included within the HELAA sites for assessment but are almost entirely rejected on grounds of suitability and availability.
- 2.64 There is no evidence in the HELAA, or elsewhere in the supporting information of the Local Plan that the potential for re-provision of land swaps with other sites (including possibly land within Green Belt where allotments would not be

an inappropriate form of development); or outside but adjacent to the City in a neighbouring local authority area have been tested or evaluated. Given the extensive level of allotment land coverage within Oxford, there is a question as to whether the HELAA and the Local Plan have sought to unlock allotment land for residential development through such mechanisms in order to overcome the constraints, as the PPG expects at ID 03-21.

Oxford City Council Owned Sites

- 2.65 It is evident from the HELAA that a number of the sites included within the assessment but often rejected have freeholds in the ownership of OCC.
- 2.66 Sites such as the Telephone Exchange (HELAA site 78); the St Aldates Council office (not assessed in the HELAA); various existing residential estates; and a former Debenhams building now proposed for re-development for research & development purposes have either been 'Rejected' by the HELAA due to availability or were not assessed in the first place.
- 2.67 The NPPF expects systematic evaluation of publicly owned properties and sites at paragraph 121².
- 2.68 It is incumbent on OCC, in the circumstances of Oxford's purported future housing needs to ensure that all of the Council's own property assets have been effectively and comprehensively assessed to understand their potential for residential development.
- 2.69 There does not appear to have been any systematic appraisal of the potential for re-development of Council assets for housing as part of the Local Plan 2040 process.

² NPPF paragraph states: "Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes".

Approach to Estimating Development Potential

- 2.70 Section 2.2 of the HELAA establishes the approach taken to estimating the development potential of sites. In summary, the HELAA uses bespoke site specific analysis to inform the capacity assumption in some cases and density typologies in other instances.
- 2.71 Paragraph 2.2.2 identifies that only where there is no planning permission or site allocation (presumably a pre-existing allocation from the Oxford Local Plan: 2036) the HELAA reverts to density typologies to inform capacity. In the case of sites with planning permission, the HELAA has, reasonably, used the capacity consented by the permission.
- 2.72 Paragraph 2.2.4 explains further that work to inform site allocations have been:
- “informed by site specific urban design assessment which consider site constraints and opportunities in more detail”.*
- 2.73 A Background Paper ‘Site Densities and Capacities’ is referred to at paragraph 2.2.4, but this does not appear to have been published with the Pre-Submission Draft Local Plan: 2040 unless the reference meant to be to Background Paper 15a ‘Site Assessment Process (Urban Design and Assessment of Housing Capacity)’.
- 2.74 It has subsequently been confirmed to SODC and VOWHDC by OCC that the ‘urban design capacity assessments’ for individual sites are not publicly available and were prepared for internal use only. OCC confirmed that they would not provide them to SODC and VOWHDC either. It is not possible therefore to examine those assessments or the approach taken in each case in any detail and no conclusions can be reached as to the extent to which a rigorous approach to maximising capacity has actually been undertaken.

Density

- 2.75 Securing and optimising higher densities of residential development accords with the objectives for making effective use of land set out in Section 11 of the NPPF.

2.76 Indeed, NPPF paragraph 120 I identifies the substantial weight and value of using suitable brownfield land within settlements for homes and other needs; and NPPF 120 (d) in promoting the development of under-utilised land and buildings especially if this would help meet identified needs for housing where land supply is constrained.

2.77 NPPF paragraphs 124 and 125 support the efficient use of land including policies for minimum density standards for city and town centres and other locations that are well served by public transport. Importantly, the NPPF expects at paragraph 125:

“where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”. [Our emphasis].

2.78 The same paragraph continues at 125 (a) seeking a significant uplift in the average density of residential development within these areas. The use of density standards is also supported for other locations so that there is a range of densities that reflect accessibility and the potential of different areas rather than one broad range.

2.79 It is therefore evident, in our view, that the NPPF is supportive of establishing and raising minimum net residential density standards and that these are aligned with accessibility to key services.

2.80 The density typology approach has been applied to Oxford HELAA sites without an existing allocation or planning permission. Four typologies are stated to have been used which are the same densities applied in earlier HELAA work in 2016 and 2019):

- District Centre: 100 – 120 dwellings per hectare (**dph**);
- Gateway Site: 60 – 70 dph;
- Suburban Site: 50 – 60 dph;
- Conservation Area: 35 – 55 dph.

- 2.81 The density bands represent a significant range from 35 – 120 dph but the density assumptions for Gateway sites appear relatively low given the prominent character and intensity of land use at such pivotal locations. The density assumptions for Gateway sites could be increased to support a significant uplift in the average density as envisaged by NPPF paragraph 125.
- 2.82 There is also a question as to whether a lower density range is appropriate in all situations across the City’s Conservation Areas especially where higher density residential development may form part of the heritage characteristics that such areas seek to protect.
- 2.83 Wider research³ tends to indicate that there is not a clear point at which increased housing density is unacceptable; but rather acceptability of higher densities is based on personal and cultural perceptions as well as on good design leading to successful places to live planned from the outset.
- 2.84 Overall, higher density assumptions could be used in the HELAA to reflect the NPPF’s objectives and ambitions for effective use of land and sites and drive towards more efficient use of land in Oxford.

Student Accommodation

- 2.85 The approach to student accommodation capacity is considered in paragraph 2.2.9 of the HELAA. The capacity assessment draws from the site allocation policy in the draft Local Plan 2040 or extant permission (if available) together with landowner / site promoter capacity assessments where provided.
- 2.86 The approach to calculating the number of rooms in terms of a ‘dwelling equivalent’ follows the national approach set out in the Housing Delivery Test (no. of rooms divided by 2.5). The capacity of self-contained accommodation (within Use Class C3) is calculated on a 1:1 basis and we conclude that this is a reasonable approach to take.

³ Including research conducted by the Greater London Authority as part of the preparation of the London Plan, 2021:
https://www.london.gov.uk/sites/default/files/london_plan_topic_paper_on_density_policy_and_details_of_research_-_2017_final.pdf

- 2.87 The approach taken in the HELAA to student accommodation capacity and dwelling equivalents therefore uses national ratios.

Over-coming Constraints

- 2.88 The PPG is clear at ID 03-21 that when constraints are identified that impact on the suitability, availability and achievability of a site for residential development:

“the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners, which may affect the availability of the site”. [Our emphasis].

- 2.89 It is not however evident from the HELAA appraisals that where sites have been assessed and rejected as unsuitable, unavailable or unachievable that there has been any further work to examine how the identified constraints could be overcome and therefore allow the site in question to form part of the potential housing land supply.
- 2.90 Furthermore, it is evident that in some cases there are sites that have been assessed and rejected from various HELAA's over time but there have been no programmes or interventions established to help overcome the constraints identified. We would expect to see more evidence of a proactive approach to overcoming constraints in the context of Oxford as a complex, constrained city with a high purported housing need.
- 2.91 There is no evidence in the individual HELAA site analyses that the PPG's guidance in over-coming constraints has been realistically addressed.

Non-Implementation Discount Buffers

- 2.92 At paragraph 3.0.2 the HELAA methodology states that a 10% discount is applied to the total housing capacity figure derived from the assessment of all sites that are concluded to be suitable, available and achievable.

2.93 The HELAA explains that the discount represents a buffer to account for potential non-delivery of identified sites and states that:

“This is a proportionate approach in a constrained city with a capacity-based housing requirement”.

2.94 Firstly, the NPPF does not require a discount or buffer to be applied in the assessment of total housing capacity. The national policy allows the application of buffers (non-implementation or discount rates) to the housing supply arising from potential development sites in establishing the five-year housing land supply of deliverable sites in accordance with NPPF paragraph 74. Critically, the NPPF expects that the buffer is drawn from sites and capacity moved forward from later in the plan period, rather than an overall discount to housing land capacity.

2.95 The principle under-pinning a discount or non-implementation rate approach reflects the relative degree of uncertainty surrounding the different components of supply. The greater the degree of uncertainty, the greater the discount.

2.96 The PPG at ID 03-24 supports the preparation of an indicative housing trajectory with an overall risk assessment made as to whether sites will come forward as anticipated. It does not however establish a requirement or approach that necessitates a non-implementation buffer or discount but rather expects that the HELAA’s assessments of suitability, availability and achievability taken together provide the risk assessment.

2.97 Indeed, where sites have been assessed in the HELAA as suitable, available and achievable⁴ this methodology provides the risk-based analysis to consider the potential likelihood of delivery occurring on-site; the conclusion being that sites meeting these tests are anticipated to be deliverable for the level of housing tested. A further buffer or discount applied is therefore considered to

⁴ To note, the PPG states at ID 03-20 that “a site is considered achievable for development where there is a **reasonable prospect that the particular type of development will be developed** on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the **capacity of the developer to complete and let or sell the development over a certain period**”.

be overly cautious and unnecessary (unless the Council is concerned that its HELAA assessments are unreliable?).

- 2.98 Setting the principle of discounting total supply aside, it is also of concern that the 10% discount is unsubstantiated in its own right. It is purported to reflect the situation in Oxford but there is no indication in the HELAA or annual monitoring, nor in any other evidence or background paper, as to the evidence of historic non-implementation rates for housing schemes to underpin the discount proposed. Where then is the evidence of a non-implementation rate review for Oxford City and how was a 10% reduction derived?
- 2.99 The effect of applying a discount is to reduce the total capacity of the HELAA sites as shown in HELAA Appendix B by 10% during the plan period.
- 2.100 It is therefore noted that the table at paragraph 3.0.4 of the HELAA subtracts **652** dwellings from the total HELAA sites identified as suitable, available and achievable (10+ dwellings) resulting in a reduced total stated capacity from such HELAA sites of 5,870 dwellings.
- 2.101 The result of applying a discount is to require additional sites and land to be identified to help meet the housing need and the need to take a more positive approach to identifying potential housing sites in order to build greater resilience and flexibility into the Plan's housing land supply.
- 2.102 Our view is that HELAA's non-implementation buffer should not be applied as it is not justified by national policies and guidance or substantiated by local evidence.

Timescales for Development

- 2.103 The timescales for development of sites deemed available, suitable and achievable are set out in Appendix B to the HELAA and the approach to the development trajectory explained in paragraphs 2.2.20 onwards.
- 2.104 The approach assigns each appropriate housing site into the 1-5, 6-10, 11-15 or beyond 16 years categories from 2020. This accords with the NPPF at paragraph 68 (a) and 68 (b).

- 2.105 The assignment of sites to different five-year tranches is explained in the HELAA as being based on broad assumptions about build out rates and lead in times drawing from a sample in the previous 2019 HELAA; and from evidence of existing completions or ongoing construction for sites particularly in the 1 – 5 years' category. Completions pre 1st April 2020 are excluded as this is the base date for the Local Plan.
- 2.106 The approach to delivery timescales appears consistent with the NPPF's requirements but there is relatively little weight of evidence and information presented in the HELAA (and very little within the Pre-Submission Draft Local Plan: 2040) as to the overall housing delivery trajectory that results from the assignment of sites to different delivery periods.
- 2.107 Indeed, it is left to the reader to calculate the level of housing delivery anticipated in each five-year period and evidently the overall total does not come anywhere near meeting the identified housing need for Oxford set out in the HENA and Policy H1 of the Local Plan 2040. There is a lack of analysis of the effects of this in the HELAA (or the Plan itself) in terms of the implications for delivery rates and completions anticipated over time, but plainly the HELAA's conclusions on timescales points towards a back-loaded housing trajectory (we consider this point further later in the report at Section 4 concerned with the proposed Housing Allocation Sites).

Approach to Windfall Housing Supply

- 2.108 Paragraph 71 of the NPPF and the Planning Practice Guidance at ID 03-023 provide for an allowance to be made in Local Plans for windfall housing sites if there is compelling evidence that such sites have consistently become available in the area; with respect to future trends; and that windfalls will continue to be a reliable source of housing supply.
- 2.109 The HELAA includes an assessment of the potential contribution of windfall housing sites in Section 2.3. It indicates in paragraph 2.3.1 that, in Oxford, a windfall site is considered to be a small site capable of accommodating 1 – 9 dwellings.

- 2.110 As previously noted, the windfall definition in Oxford is not entirely consistent with the PPG at ID 03-009 which states that it may be appropriate to consider sites capable of delivering five or more dwellings (i.e. windfall sites being fewer than five dwellings in size). However the PPG does also indicate that there is scope to consider alternative site size thresholds.
- 2.111 The Local Plan: 2036 Oxford City HELAA (November 2017) had used a site size threshold of 0.25 Ha delivering five or fewer dwellings as the definition of windfall⁵ (resulting in an annual average of **60** dpa excluding garden land infill; if garden land was included the average windfall delivery rate increased to **120** dpa).
- 2.112 The change in definition in the HELAA methodology between the earlier work and the latest HELAA means that the older windfall figures (pre- 2016/17) are not consistent with the newer definition now used.
- 2.113 Paragraph 2.3.5 of the HELAA identifies that most of the windfall sites come from: sub-division of existing housing, flats over shops, intensification of sites, redevelopment of existing housing, development of derelict land / buildings on brownfield land and conversion of commercial land to housing. Housing from development of garden land is also now included.
- 2.114 At paragraph 2.3.6, the HELAA presents historical trend data for annual windfall completions (including C2 Use Class student accommodation / care homes and prior approval schemes) for seven years from 2016/17 (the start of the Local Plan: 2036 period. It highlights an annual average windfall of **116** dpa over the past seven years; a total of 810 dwellings in that period.
- 2.115 The annual average delivery masks considerable variations in windfall outputs each year, with a peak of 258 dwellings achieved in 2016/17 and a low of 49 dwellings in 2017/18. The level of windfall development was also low during

⁵ Paragraph 2.1.6 of the Oxford City HELAA (November 2017) states: “*In previous SHLAAs, the City Council has typically taken 10 dwellings as the threshold. For the 2016 HELAA the site size threshold has been reduced to an area that could deliver 5 or more dwellings in line with the guidance. This HELAA does not include sites which are smaller than 0.25ha. Sites delivering houses on these smaller sites will be treated as windfalls*”. It is noted that the HELAA 2017 also gave windfall figures excluding the use of garden infill land which is now included in the latest HELAA 2023.

2020/21 at the height of the Covid-19 pandemic but increased to 172 dwellings in 2021/22 and then decreased again to 86 dwellings in the most recent 2022/23 year.

- 2.116 To cross-reference the later years, the Council's latest Authority Monitoring Report April 2021 – March 2022 (December 2022) (**AMR**) identifies a windfall dwelling delivery rate of **136** dwellings per annum (see Table 19: Oxford's Housing Land Supply 2022/23 – 2026/27). The Housing Need and Requirement Background Paper (BP1) for the Local Plan: 2040 (Preferred Options) states (un-numbered paragraph at page 6) that the capacity arising from windfall development is assumed to be **127** dpa. This figure is said to have been drawn from the HELAA analysis in 2022.
- 2.117 Clearly there is evidence of significant delivery of new dwellings arising from small windfall sites and the HELAA (and the Local Plan) are therefore right to include windfall development as an important source of future housing supply. Paragraph 2.3.9 appropriately confirms that windfalls are not counted for 2020/21 – 2022/23 as completions data is available for this period. Windfall allowance is not included for the further three years 2023/24 – 2025/26 to avoid double counting with planning permission commitments. The overall allowance established in the HELAA at **116** dpa is used for the period 2026/27 to 2040; a 14-year period totalling **1,624** windfall dwellings.
- 2.118 The calculation of windfall housing delivery has been subject to considerable variability and sensitivity over time, arising from changes in the local Oxford definition of windfall site sizes / minimum housing output and also the effects of the pandemic and economic / development market uncertainty leading to dampened development rates and fluctuations in the most recent years.
- 2.119 The windfall rate identified in the HELAA and used in the Local Plan: 2040 at 116 dpa is low compared with the figure in the latest AMR and previous years' HELAA evidence.
- 2.120 A higher windfall allowance rate could be justified given both the change in definition of windfall in Oxford (from <5 dwellings to <10 dwellings in the most recent HELAA); and the confidence that the Council place on a continued trend in significant windfall housing delivery with an expectation that this will continue

throughout all areas of Oxford in the plan period to 2040 (as paragraph 2.3.10 of the HELAA identifies).

2.121 Indeed, a higher windfall rate may be anticipated during the lifetime of the Local Plan: 2040 due to the recent Government announcement to create a new Permitted Development Right to allow the subdivision of existing houses into two flats.

2.122 The HMT Autumn Statement CP977 (November 2023) includes a significant planning reform measure that could support a substantial increase in windfall housing delivery by removing the need for planning permission to convert an existing house into two flats. This is relevant to the Oxford City context given the substantial amount of existing housing stock that could come within the scope of the proposed Permitted Development Right (it is assumed the right would cover non-listed residential dwellings and likely be subject to minimal prior approval procedures). Paragraph 5.200 of the Autumn Statement states:

“Permitted Development Right convert one house into two flats – The government is announcing a consultation on a new Permitted Development Right for subdividing houses into two flats without changing the façade. This will be implemented in 2024 following consultation early in the New Year”.

2.123 It will be important to ensure that the future windfall potential is effectively monitored during the Plan’s lifetime and that it adequately accounts for the rate of residential development arising from ‘finite’ sources such as through the continued conversion of former office and commercial floorspace accommodation to new dwellings via Permitted Development Rights⁶.

⁶ As set out in the *Town and Country Planning (General Permitted Development) (England) Order 2015* (as amended)

Summary Conclusions

- a) Our review of the method and assumptions used in the HELAA identifies that the overall approach is not wholly consistent with national policy and practice;
- b) the HELAA 2023 assessed **479** sites in total;
- c) it includes sites with potential for housing over **0.25 Ha** or capable of delivering **10+** dwellings; it includes economic uses of **500+** sq.m;
- d) the site size threshold used broadly accords with national policy and practice although the NPPG considers that it may be appropriate to consider all sites / locations capable of delivering 5 or more dwellings. It is questioned whether, in Oxford's circumstances a smaller site size threshold (5+ net dwellings) would be a more appropriate starting point;
- e) total housing supply arising is stated to be **9,612** net additional dwellings (including a 10% non-implementation buffer applied to the HELAA sites that removes some 652 dwellings identified as suitable, available and achievable). This is comprised of **1,846** dwellings completed 2020/21 – 2022/23; **5,870** dwellings from HELAA sites identified as suitable, available and achievable (10+ net dwellings in size); 272 dwellings from small sites (<10 dwellings with planning permission); and 1,624 dwellings from windfall sites (116 dpa);
- f) the approach to inclusion / exclusion or assessment of housing development on various types of land and sites highlights:
 - o **flood risk zones** – the HELAA includes sites in Flood Zones 1 and 2 and states that there is a bespoke approach with respect to potential sites in Flood Zone 3. Existing developed sites within Flood Zone 3b can be considered for “*very careful re-development*” and are not excluded from the HELAA.

The benefit in reducing fluvial flood risk that the implementation of the Oxford Flood Alleviation Scheme works would provide raises the potential for a more positive approach to unlocking future development land from Flood Zone 3 areas where the effects of the OFAS defence works would ultimately reduce the flood risk in those areas;

- **Employment sites** - the draft Local Plan: 2040 introduces a more permissive approach (through Policy E1) to allow an element of residential development on employment sites where this would not prejudice the employment or operational use of the site. The HELAA states that all employment sites with the potential to deliver housing have been included in the assessment but there is no publicly available evidence that the Cat 3 sites have been assessed (the Interim ELNA assesses Cat 1 and Cat 2 employment land). There is also no clear evidence as to the realistic capacity for residential development within the Cat 1 and Cat 2 employment sites assessed and in many cases such sites are rejected for residential development through the HELAA analysis on the basis of landowner intentions and therefore lack of availability.

There is no clear evidence that a systematic analysis of the constraints (and mechanisms to overcome these) have been considered for sites that are, or have previously been rejected from the HELAA;

- **Open Air Outdoor Sports Facilities** - The HELAA recognises that outdoor sports facilities are protected in the Development Plan and the emerging draft Local Plan: 2040. The HELAA relies upon the draft Oxford Playing Pitch and Outdoor Strategy 2022 – 2036 which assesses the existing and future need for playing pitch provision, concluding that there is a need to protect outdoor sports facilities but also to enhance provision through greater community access and intensification of use of existing sports and recreation space. The Strategy has not been published with the evidence

base for the Local Plan and appears to remain in draft form. It also covers the period 2022 to 2036 rather than the Local Plan period 2020 – 2040.

The HELAA assessments of sports pitches shows that where they have been assessed they are almost always rejected on the basis of suitability or availability, despite clear opportunities to allow for re-development or partial development through more effective and intensive use of the extensive existing outdoor space provision. The lack of analysis of current and future needs for golf course facilities is an evident and important gap given the extent of existing golf course land use within the city;

There is no evidence in the HELAA, or elsewhere in preparation of the Local Plan that the potential for re-provision of land swaps with other sites have been tested or evaluated.

- **Allotments** - Oxford Local Plan policies provide for the protection of existing allotments and restricts their loss although it allows for re-provision.

The HELAA states that the majority of allotment sites have waiting lists which illustrates the high demand that exists (although it is not clear where the evidence for this is to be found). Allotments are included within the HELAA sites for assessment but are almost entirely rejected on grounds of suitability and availability.

There is no evidence in the HELAA, or elsewhere in preparation of the Local Plan that the potential for re-provision of land swaps with other sites have been tested or evaluated.

Given the extensive level of allotment land coverage within Oxford, there is a question as to whether the HELAA and the Local Plan have sought to unlock allotment land for residential development through such mechanisms to overcome the constraint.

Estimating Development Potential and Densities

- g) Estimating development potential through the HELAA is done on the basis of density typologies where there is no planning permission or pre-existing site allocation for sites. The HELAA explains that site specific urban design assessments have been undertaken but these are not publicly available;
- h) the density bands represent a significant range from 35 – 120 dph but the density assumptions are quite low especially for Gateway sites at pivotal locations. The lower density range for Conservation Areas is also questioned especially where higher density residential development forms part of the heritage characteristics that such areas seek to protect and, in some cases, coincides with city and district centres that the Local Plan identifies as locations for higher density development;
- i) for student accommodation, the HELAA proposes an approach that accords with accommodation dwelling equivalents set out in the national Housing Delivery Test.

Overcoming Constraints

- j) The HELAA's method does not show where there has been consideration of what actions could be taken to overcome constraints to suitability, availability or achievability as the NPPG expects and therefore allow the site in question to form part of the potential housing land supply.

Non-Implementation Rates

- k) The HELAA applies a 10% Non-Implementation discount to the capacity of all sites that are concluded to be suitable, available and achievable;
- l) the NPPF does not require a discount or buffer to be applied in the assessment of housing capacity other than in establishing the five-year housing land supply position. Critically, the NPPF expects that the

- buffer is drawn from sites and capacity moved forward from later in the plan period rather than an overall discount to housing land capacity;
- m) the NPPG supports the preparation of an indicative housing trajectory with an overall risk assessment as to whether sites will come forward as anticipated. It does not however necessitate a non-implementation buffer, but rather that the HELAA's assessments of suitability, availability and achievability taken together provide the risk assessment considering the potential likelihood of delivery occurring on-site. The conclusion being that sites meeting these tests are anticipated to be deliverable for the level of housing tested;
 - n) it is also of concern that the 10% discount is unsubstantiated in its own right. It is purported to reflect the situation in Oxford but there is no indication in the HELAA as to the evidence of historic non-implementation rates for housing schemes to underpin the discount proposed. This should be evidenced to allow closer understanding;
 - o) overall the result of applying a discount is to require additional sites and land to be identified to help meet the housing need and the need to take a more positive approach to identifying potential housing sites in order to build greater resilience and flexibility into the Plan's housing land supply.

Timescales for Housing Development

- p) The approach to delivery timescales appears consistent with the NPPF's requirements but there is relatively little weight of evidence and information presented in the HELAA (or the Local Plan: 2040) as to the housing delivery trajectory that results from the assignment of sites to different delivery periods;
- q) it is left to the reader to calculate the level of housing delivery anticipated in each five-year period and evidently the overall total does not come anywhere near meeting the identified housing need. There is a lack of analysis of the effects of this in the HELAA (or the Plan

itself) in terms of the implications for delivery rates and completions anticipated over time.

Approach to Windfall Housing Supply

- r) The HELAA provides an assessment of the potential contribution of windfall housing sites. The windfall definition in Oxford is not entirely consistent with the NPPG (which indicates windfalls as using being on sites capable of fewer than five dwellings in size);
- s) the HELAA identifies that most of the windfall sites come from: sub-division of existing housing, flats over shops, intensification of sites, redevelopment of existing housing, development of derelict land / buildings on brownfield land and conversion of commercial land to housing. Housing from development of garden land is also included;
- t) it is clear that there is evidence of significant delivery of new dwellings arising from small windfall sites and the HELAA (and the Local Plan) are therefore right to include windfall development as an important source of future housing supply;
- u) the calculation of windfall housing delivery has been subject to considerable variability and sensitivity over time arising from changes in the local Oxford definition of windfall site sizes / minimum housing output and also the effects of the pandemic and economic / development market uncertainty leading to dampened development rates and fluctuations in the most recent years;
- v) overall, the windfall rate identified in the HELAA and used in the Local Plan: 2040 at **116 dpa** appears low in comparison with the figure used in the latest AMR (**136 dpa**) and previous HELAA 2022 evidence (**127 dpa**).

3. Potential Sources of Housing Land Supply

Introduction

- 3.1 This Section focuses on reviewing the outputs from the HELAA in terms of sites that have been proposed and rejected for residential development as part of the process. We also review the extent to which there are sites that were not assessed through the HELAA to date. The section considers whether there is a possibility for additional housing sites and illustrates the potential capacity that might be identified from these sites.

Preparatory Methodology

- 3.2 In order to appraise the HELAA sites and outputs as well as review sites that were not assessed through the HELAA it is important to set out the preparatory methodology that we have used.
- 3.3 GIS shape files with site details in terms of boundaries, names and references were received from Oxford City Council in October 2023.
- 3.4 The data files contained a total of 489 sites. This data was matched with data from the latest version of the HELAA (September 2023) which included 479 sites in total.
- 3.5 There was overlap in some sites, with smaller sites grouped as a larger single site and then set out as individual sites.
- 3.6 12 sites were not included in the latest HELAA analysis but had been provided as GIS boundary files with HELAA references. One site was contained within the GIS files provided but not included in the HELAA.
- 3.7 Initial contextual analysis was undertaken of the data provided to us. This included:

- setting out the number and location of sites that were ‘Accepted’ or ‘Rejected’ for residential or employment uses (using the HELAA definitions of Accepted or Rejected⁷);
- applying a broad typology of sites in terms of existing land use type to aid ease of analysis;
- understanding site area totals in terms of hectarage; and
- filtering sites to understand which HELAA sites were suitable, available or achievable.

The HELAA’s Findings

3.8 This sub-section summarises the overall analytical results from the latest Oxford HELAA (September 2023).

HELAA Sites: Overall

3.9 A total of 479 sites were included in the HELAA for analysis. Of this total, 98 sites (20.5%) were ‘Accepted’ by the HELAA as having potential for housing; 381 were ‘Rejected’ (79.5%).

3.10 We note that the HELAA total number of sites differs from the 471 sites referenced in Paragraph 5.11 of the Regulation 19 Sustainability Appraisal⁸. This document highlights sites that were not carried forward to allocations from the Preferred Options stage.

3.11 Of the HELAA’s total 479 sites, it is interesting to understand the mix of types of land and sites, including:

- 178 Green Infrastructure sites (including informal and formal play areas);

⁷ HELAA ‘Accepted’ sites are those that the HELAA concluded satisfactorily passed the three tests of suitability, availability and achievability. ‘Rejected’ sites are those where the HELAA concluded that one or more of the tests were failed.

⁸ https://www.oxford.gov.uk/downloads/file/8690/sustainability_appraisal_regulation_19

- 122 buildings;
- 88 outdoor formal sports sites;
- 31 allotments;
- 8 car parks; and
- 88 cemeteries.

3.12 The 98 Accepted sites have a total site area of 255 Ha.

3.13 Of the 98 sites Accepted for residential development, 23 were also accepted for employment and economic use; a total of 171 Ha.

3.14 Of the 381 Rejected HELAA sites, 27 were not tested for residential. These were largely existing employment sites (of various categories) and despite a broadly positive policy approach set out in the draft Local Plan to release of existing employment land for residential development (particularly for Cat 2 and 3 employment land) this is a strange oversight or clear omission from the HELAA's work.

Suitability, Availability and Achievability

3.15 The HELAA used three assessment filters in conducting individual site appraisals – suitability, availability and achievability (effectively viability for future development).

Suitability

3.16 156 HELAA sites were deemed as suitable for development for either housing, economic uses or both.

Availability

3.17 117 HELAA sites were deemed available. 98 of these sites were concluded overall to be Accepted by the HELAA for housing. 19 sites identified as available were then Rejected by the HELAA in its conclusions as having potential for housing.

Achievability

3.18 475 HELAA sites were concluded to be achievable (viable) for future development. Only four potential sites tested by the HELAA were considered not to be achievable for development in the plan period. These are:

- Site: 33 Littlemore Mental Health Centre, Sandford Road where the explanation was that the Site is a non-viable typology;
- Site: 40 Orion Academy - Site is non-viable typology (15/16);
- Site: 409 Oxford Retail Park, Ambassador Avenue - Site is non-viable typology (Includes petrol station, likely to be land contamination); and
- Site: 459 Buildbase Watlington Road (within #503) - Non-viable typology.

3.19 All four sites were rejected for housing or economic uses. The non-viable typology of Site 459 was not explained further.

Headline HELAA Analysis Conclusions

3.20 Our analysis of the overall HELAA results raises the following headline issues:

- a) despite an encouraging policy position, 27 predominantly existing employment sites were not tested for residential use in the HELAA at all. This is a missed opportunity inconsistent with the policies of the Local Plan, that Oxford City Council should address;
- b) the extent of sites being Rejected by the HELAA due to their availability is stark. 156 sites identified as suitable are reduced to only 98 sites when availability is also factored in; a reduction of 58 sites. Put simply, lack of availability on 58 otherwise suitable sites led to their ultimate rejection by the HELAA. Applying modest density per hectare figures suggests a potential loss of capacity of over 3,000 dwellings due to lack of availability, on sites otherwise assessed as suitable for housing. We illustrate the effects of working to ensure these sites become available for residential development (based on 'bookend' assumptions that either 20% or 80% of the total sites could be delivered). Clearly there are a range of complex reasons behind unavailability, but it is not always clear in the HELAA

analysis as to the potential for flexibility in making an otherwise suitable site available;

- c) landowner intentions are reported in a cursory fashion within the HELAA and there is little available evidence to indicate just how strenuous or extensive the efforts have been in all cases to obtain landowner indications of availability or to address these matters in the context of a Local Plan period that extends for 20 years to 2040.

Indeed, in Oxford's circumstances of having substantial unmet need, it should be expected that there would be published log records of contacts made, discussions held, consistency in the form and recording of contact (for example a standard pro-forma approach) or understanding of the timing of when landowner or developer contact was made and updated.

The importance of availability of sites and accurate landowner intentions is critical in securing housing land supply in the context of Oxford's constraints. The clear result here is that landowner intentions significantly reduce the potential for housing supply in Oxford through the HELAA.

Re-considering the HELAA's Rejected Sites

- 3.21 A desk-based re-assessment of sites Rejected by the HELAA was undertaken for a total of 381 sites Rejected as having housing or economic use potential.
- 3.22 In the substantive majority of sites the logic and analysis applied through the HELAA was considered to be appropriate and reasonable. Put simply, for many of the sites that were ultimately Rejected by the HELAA, the assessment process and decision-making appears soundly based.
- 3.23 There are however a number of sites 'Rejected' by the HELAA where it is possible to query the conclusions reached.
- 3.24 It is important to note that a number of these Rejected sites have been previously assessed in Oxford's Local Plan: 2036 Strategic Housing Land Availability Assessment, or were HLAA appraised / commented upon in the

report Unlocking Oxford's Development Potential (2014) prepared by consultants Cundalls.

- 3.25 It is apparent that despite some of these Rejected sites being a focus in previous plan-making, there is little evidence of a proactive approach since then to assist in identifying the actions that could be taken to overcome constraints and bring sites forward (which the PPG methodology or assessing housing and economic land availability expects at paragraph ID 03-21).
- 3.26 This is concerning both in terms of ensuring the HELAA's work is consistent with the NPPG particularly regarding maximising housing delivery in the context of the purported significant future housing needs of Oxford.
- 3.27 An initial 'long list' of Rejected sites was assembled, but after individually reviewing each such site, we concluded that 24 sites were worth further, more detailed re-consideration. These 24 sites totalled 88.95 Ha of land and are shown in a table at **Appendix A1**.
- 3.28 We have applied the Plans relevant density to the Net Developable Area (**NDA**) of these sites using the Council's stated density ranges figures, for example for City and District Centres we have used 100 and 120 dph.

Table 3.1: Rejected Sites Potential Indicative Housing Capacity (Dwellings)

	Low Range	High Range
Rejected Sites Capacity	2,967	3,593

Source: UDL and CCL calculation

- 3.29 We have grouped the sites into the following four broad themes for ease of review and understanding in the following sub-sections:
 - **A: Taking a More Proactive Approach** – where a more proactive or intervention-led approach could help unlock sites for development (9 sites);
 - **B: Residential Use Not Tested** – where the potential for residential development was not tested (2 sites);

- **C: Overly Cautious HELAA Appraisal** – where the HELAA’s assessment can be considered to have been overly cautious (3 sites); and
- **D: Estate Regeneration Opportunities** – where planned and programmed housing estate regeneration or intensification could yield a greater intensity of residential use (3 sites).

3.30 There are also 2 other rejected HELAA sites of interest, one where a more innovative approach could unlock a land swap for an area of allotments into the adjacent Green Belt and the other where there was an underused piece of low grade land with development surrounding it.

3.31 There are also 3 other rejected HELAA sites of interest, one where a more innovative approach could unlock a land swap for an area of allotments into the adjacent Green Belt (HELAA site reference 333 - Watlington Road); one where the site description does not appear to match the supplied site boundary (site 258 - New University Club Sports Ground); and the third where while it represents in our view a potential candidate for Green Belt release (site 114a - Land at Marston Brook (Northern Part)) we understand this is within the ownership of the Oxford Preservation Trust explicitly for the reason of preventing future development.

3.32 We set out below some example sites in the following sub-sections to illustrate where an alternative view or approach might help unlock housing land capacity and therefore supply of residential development.

A: Taking a More Proactive Approach

3.33 There are evidently opportunity sites, particularly previously developed or under-utilised land, assessed and rejected by the HELAA where a more proactive or intervention-led approach could help unlock housing capacity.

3.34 With a more proactive frame of reference and approach to the delivery of some sites there could be potential for some additional level of new housing to be brought forward, including as part of mixed-use regeneration where appropriate.

3.35 We include two examples below that were both were Rejected sites in the HELAA:

- Royal British Legion, Lakefield Road (HELAA site 604); and
- Blanchfords Builders Yard (site 438).

Figure 3.1: The Royal British Legion, Lakefield Road (Site 604)



Source: QGIS using data from Google earth and Oxford City Council

3.36 The Royal British Legion site at Lakefield Road (HELAA site 604) is 0.35 Ha in size with a NDA of some 0.26 Ha. It could be appropriate for some 13 - 16 residential dwellings based on the suburban density of 50 - 60 dph, as it was identified as a suitable site in the HELAA. The site was however ultimately rejected as not available.

3.37 This site would benefit from a proactive and more interventionist approach in order to unlock its re-development during the lifetime of the Local Plan. This is particularly needed in cases, such as this where landowner intentions and purported current freehold / leasehold issues have restricted the ability of the site to be considered available for development.

3.38 The ownership and leasehold issue should not be a barrier to regeneration of sites such as this, especially given the low quality of the existing building, the

poor use of the available site area and the compatibility of residential development here with surrounding land use activities.

Figure 3.2: Blanchfords Builders Yard (Site 438)



Source: QGIS using data from Google earth and Oxford City Council

- 3.39 The Blanchford's Builders Merchants / Builders Yard Site (HELAA site 438) extends to 1.01 Ha with a NDA of some 0.76 Ha.
- 3.40 The site was assessed through the HELAA and found to be a suitable site for residential development but ultimately rejected as not available due to a lack of evidence that the landowner has an intention to cease trading or relocate.
- 3.41 The potential for residential re-development of this site has been previously highlighted in work undertaken in Unlocking Oxford's Growth Potential (2014). This identified a density of just under 80 and a site capacity of 52 dwellings.
- 3.42 The site is in a good location for residential development given its situation and juxtaposition with surrounding residential areas.
- 3.43 The HELAA identified concern that access to the site was limited, but it appears to have good vehicular and pedestrian access taken from Windmill Road and not so constricted as to prevent residential development in the future.
- 3.44 This site needs a proactive approach with the landowner and through planning policy support to allow for re-development for housing given its location and

the potential to add some 38 - 45 new dwellings capacity based on 50 - 60 dph density.

B: Residential Use not Tested

- 3.45 There are numerous examples of sites included in the HELAA where the potential for development for residential use has not been assessed. These sites are typically existing employment land in Category 1 or 2, health or education facilities.
- 3.46 Given the emerging Local Plan policy basis that identifies housing delivery as a priority of the Plan and also specifically allows for residential development of employment land in principle (see draft Policy E1) it is evident that the potential of these sites for housing should be appraised through the HELAA and conclusions drawn accordingly. This is important in the context of claiming high housing needs, constrained land supply and given the Local Plan's plan period to 2040.
- 3.47 We set out below two examples of such sites where despite a policy basis that encourages the use of employment land for residential development, the HELAA did not test residential suitability or availability:
- Buildbase, Watlington Road (Site 459, within Site 503); and
 - Former Blackwells Publishing (Site 492).

Figure 3.3: Buildbase, Watlington Road (Site 459, within Site 503)



Source: QGIS using data from Google earth and Oxford City Council

- 3.48 The Buildbase, Watlington Road site (HELAA site 459 within site 503) is 2.32 Ha with a NDA of approximately 1.74 Ha. It is within a wider Category 2 employment site area (the County Trading Estate, HELAA reference 503) but is separated by the Oxford Road.
- 3.49 The site should have been tested for potential residential development given its extensive size and its existing use as mixed commercial including storage and distribution and open storage.
- 3.50 This site has potential for residential re-development through a more proactive approach, potentially in connection with and within the context of adjacent development of land in the South Oxfordshire District Council area immediately to the east (Strategic Allocation Strat 12).
- 3.51 If residential use were brought forward on the site, it could contribute some 87 - 104 dwellings based on 50 - 60 dph assumption. Higher densities than those

used herein may be appropriate for this site given its prominent location and surrounding land uses including adjacency to a strategic development allocation in South Oxfordshire.

Figure 3.4: Former Blackwells Publishing, Marston Street (Site 492)



Source: QGIS using data from Google earth and Oxford City Council

- 3.52 The Former Blackwells Publishing site (HELAA site 492) extends to 0.51 Ha with a NDA of some 0.48 Ha. It was not tested for residential use through the HELAA process.
- 3.53 The site is surrounded by residential land uses to the north, west and south and is in an appropriate location for intensification of residential use with nearby commercial and retail facilities.
- 3.54 The site is comprised of two separate commercial blocks with existing employment activities in both. There is however a question as to whether, over the course of the plan period a more proactive exploration and approach to residential (or mixed use) could bring forward housing within the site. The HELAA could have explored this, especially with regard to identifying

opportunities to unlock constraints to housing development and with respect to the Local Plan's policies to encourage residential activities on existing employment land sites.

- 3.55 If residential use were brought forward on the site, it could contribute some 48 - 58 dwellings based on 100 - 120 dph assumption. This is based on the whole site being re-developed rather than split into two where some of the existing commercial activities could remain in situ.
- 3.56 The potential for residential re-development of this site has been previously highlighted in work undertaken in Unlocking Oxford's Growth Potential (2014) which identified a contribution of some 28 dwellings.

C: Overly Cautious HELAA Appraisal

- 3.57 In some cases the HELAA has identified and assessed significant sized sites but appears to take an overly cautious approach to long-term development.
- 3.58 We include a significant site at Southfield Golf Course (HELAA sites 132 and 292) as an example of a cautious approach where there may be potential for intervention and which with focus and greater initiative, including use of a potential land swap, could be brought forward in whole or part for residential development.

Figure 3.5: Southfield Golf Course (Sites 132 and 292)



Source: QGIS using data from Google earth and Oxford City Council

- 3.59 The combined area of the Southfield Golf Course is 50.45 Ha with a NDA of some 33 Ha, making it one of the largest areas of urbanised land use within Oxford; an area surrounded by existing residential and other commercial land use activities and well positioned with respect to access to existing services and facilities.
- 3.60 Site 292 represents the whole golf course, and a smaller site (HELAA site reference 132) is the Wildlife Corridor at the centre of the golf course area.
- 3.61 The HELAA assessed and concluded Rejection of the Southfield Golf Course sites as neither suitable nor available.
- 3.62 There appears to be no recent assessment of demand or need for golf course facilities underpinning the consideration of this site. Oxford's draft Playing Pitch Strategy 2022 – 2036 (noted to remain in draft at the time of writing) which

is the latest available analysis of outdoor sports and recreation facilities makes no mention or analysis of the provision or need for golf courses or facilities.

- 3.63 We also note Oxford City Council Cabinet⁹ comments with regard to the draft Playing Pitch Strategy as reported in the minutes of the meeting on 13th July 2022 were that:

“Cabinet Members highlighted that a large number of playing fields throughout the city were owned by University Colleges and were often rarely used or made accessible for any form of community use. The Leader undertook to raise this with the Conference of Colleges”.

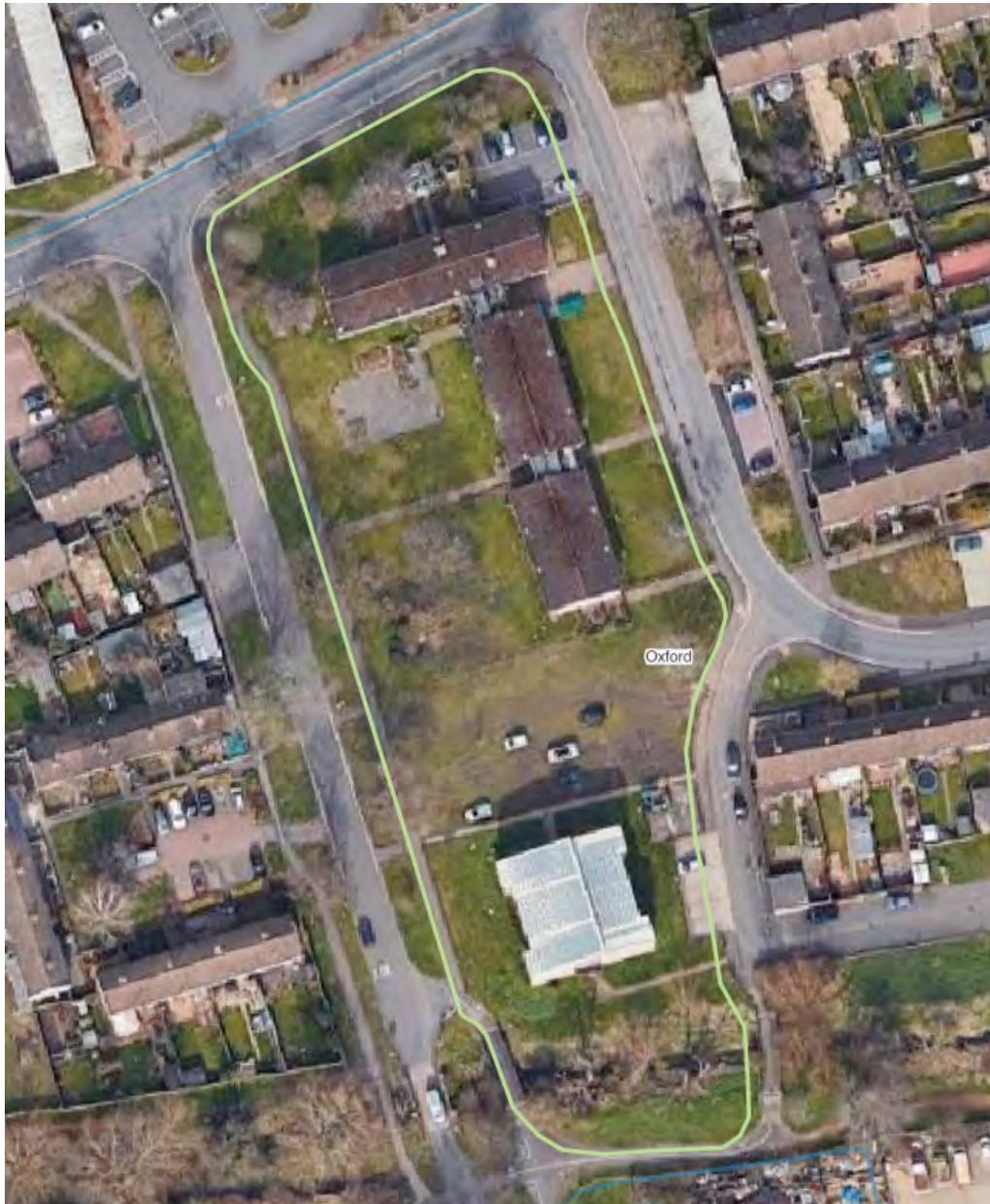
- 3.64 There is potential for exploration of a land swap with the golf activities resituated to a site outside Oxford (and which may be more appropriate in a Green Belt land location).
- 3.65 In 2014, Unlocking Oxford’s Growth Potential identified and discussed the potential for longer term re-location of the golf activities and for major re-development in part or whole for residential purposes (noting the small SSSI that abuts part of the site - marked in green in Figure 3.5 above). The basis for that analysis has not significantly altered in the intervening decade and clearly sites such as this should be evaluated closely for their potential to be released to meet the high priority use of land for new homes.
- 3.66 If residential use were brought forward on the site, Site 293 could contribute around 1,640 dwellings based on a 50 dph assumption, and 1,968 dwellings at 60 dph. The Unlocking Oxford’s Growth Potential Report estimated a yield of 1,338 based on a NDA site area of 35 Ha similar to our estimate of 33 Ha NDA. For Site 132 we have assumed a lower NDA and lower density, for a capacity of between 246 - 328 dwellings.

⁹ <https://mycouncil.oxford.gov.uk/ie/IssueDetails.aspx?Id=29560&Opt=3>

D: Estate Regeneration Opportunities

- 3.67 There are some rejected HELAA sites (and also a number of sites not assessed at all in the HELAA process) where it could be possible to drive an intensification of residential use through a planned and more efficient re-use of land via estate regeneration and intensification programmes.
- 3.68 A number of existing post war housing estate neighbourhoods and sites have the potential for intensification and infill residential development.
- 3.69 The HELAA analysis has tended to Reject these sites as they are considered individually or on a piecemeal rather than collective, systematic basis. We also saw evidence of similar estates that were not assessed within the HELAA, which could provide opportunities for intensification of existing three / four storey blocks, or where there was potential land within the curtilages of various estates which could be assessed and potentially developed.
- 3.70 One good example is land at Windale House, Pegasus Road (HELAA site 66). The site extends to some 0.78 Ha in total and is characterised by extensive and significant under-utilisation of the area, including lower density residential development and an area within the middle of the site that is un-developed and appears to be used on an ad-hoc basis for off-site, unofficial vehicle parking.

Figure 3.6: Windale House, Pegasus Road (Site 66)



Source: QGIS using data from Google earth and Oxford City Council

- 3.71 This site was assessed as suitable but not available and the HELAA concluded that there was no evidence that it could deliver any net additional new homes.
- 3.72 There is however a clear opportunity to undertake an estate regeneration programme to allow for infill or more comprehensive re-development of the existing site (excluding the area to the far south of the site which is in Flood Zone 2 and forms a landscape boundary to the existing watercourse).

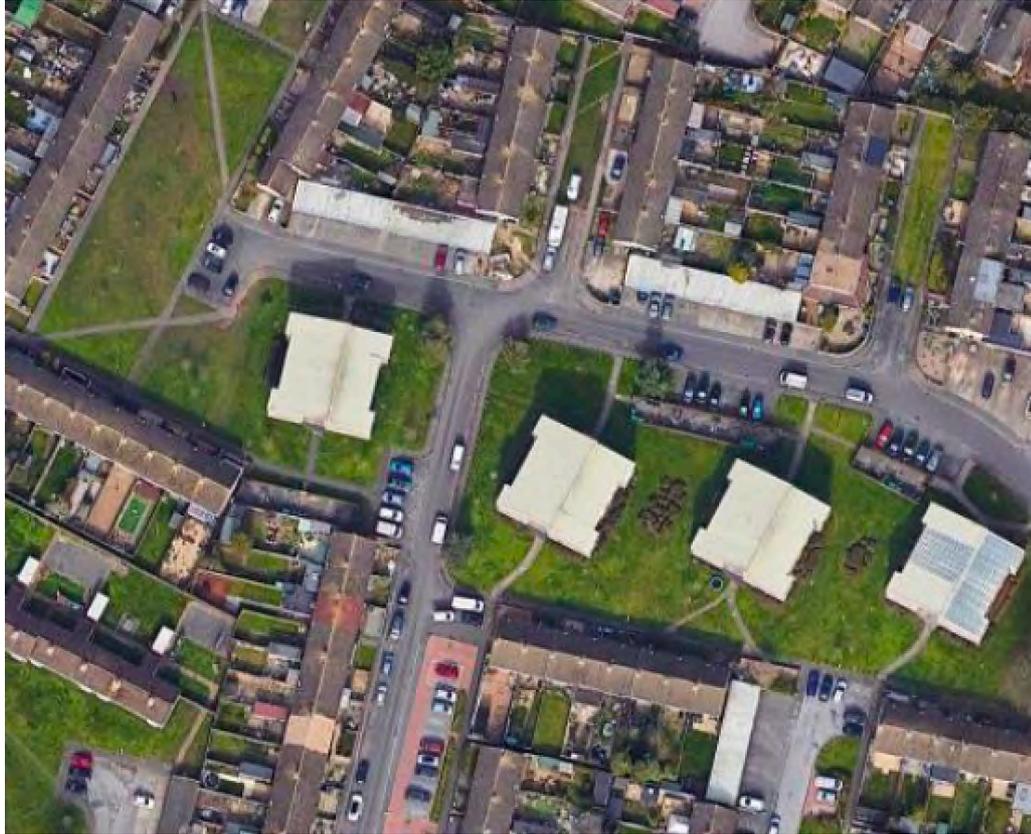
- 3.73 Rationalisation and re-use of the whole site with a more intensive form of residential development could yield 37 - 44 dwellings assuming a density of 50 - 60 dph.
- 3.74 The potential for residential re-development of this site has been previously highlighted in work undertaken in Unlocking Oxford's Growth Potential that identified a contribution of 40 dwellings from the site.
- 3.75 Two further examples of potential estate regeneration and intensification are found at Sorrel Road and at Field Avenue towards the south-eastern edge of the city.
- 3.76 Although these were not HELAA 'Rejected' sites (we have recorded them as unassessed sites in Appendix A2) they represent further evidence of the lack of a clear strategic programme to maximise the opportunities that exist within Oxford's housing stock.
- 3.77 As Figures 3.7 and 3.8 show these site areas both comprise three storey blocks set within generous plots of land. Both have the potential for future intensification of the overall quantum of housing and the density of development and were not reviewed in the HELAA.

Figure 3.7: Sorrel Road OX4 6SL



Source: QGIS using data from Google earth and Oxford City Council

Figure 3.8: Field Avenue OX4 6PH



Source: QGIS using data from Google earth and Oxford City Council

Unassessed Sites

- 3.78 A desk-based identification and assessment of sites not included in the HELAA process was undertaken.
- 3.79 This identified 12 possible sites, that in our view, should have been assessed and have factors which may lead to them being accepted as suitable for residential use. We have also identified a further eight sites which fall under our previous category of Estate Regeneration opportunities and Opportunities for Intensification.
- 3.80 We illustrate two examples further here and provide a full list of sites in **Appendix A2** alongside site location extracts. We have estimated NDA for the

12 missed sites and estimate that using densities of between 50 and 60 dph sites could provide a further housing capacity.

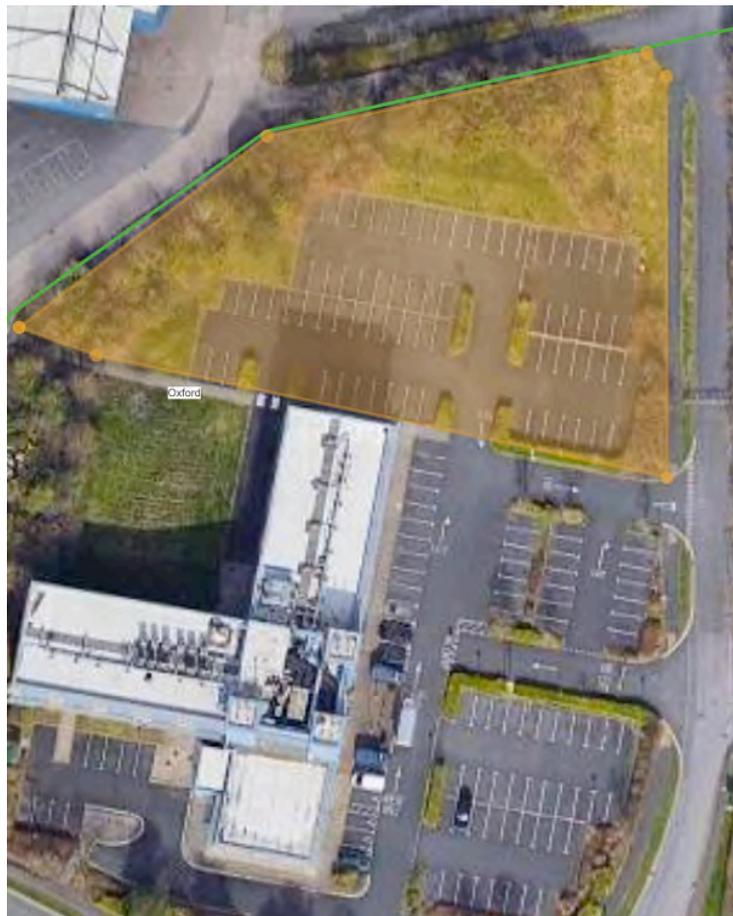
Table 3.2: Unassessed Sites Indicative Capacity (Dwellings)

	Low Range	High Range
Unassessed Sites Capacity	319	382

Source: UDL and CCL calculation

3.81 For the sites that represent estate regeneration or intensification opportunities we have not provided capacity estimates, however taken alongside the examples set out above, this is an opportunity for OCC to explore through a more proactive analysis of the potential future supply arising.

Figure 3.9: Land Adjacent to Allocation SPS2 (Kassam Stadium) and part Car Park of Holiday Inn Express



Source: QGIS using data from Google earth and Oxford City Council

- 3.82 Given the proposed allocation of the adjacent Kassam Stadium site (Local Plan proposed allocation SPS2) which is predicated on the stadium being relocated and the site re-developed in the plan period, it appears to be a clear omission to not evaluate the longer-term viability of the adjacent hotel and in particular whether the northern part of the site (shown in Figure 3.9 above) which is surface car parking could be potentially re-used for development if / when the Stadium is relocated.
- 3.83 The hard standing car park is approx. 0.20 Ha and with the land around it totals around 0.37 Ha. This could be subject to higher density development if linked to a more ambitious overall development package for the Stadium area. At suburban density rates the parking area could represent a yield of around 16 - 19 dwellings at 50 - 60 dph and around 32 dwellings at 100 dph. A larger, taller apartment-led residential scheme could achieve even higher densities.

Figure 3.10: Band Hut Adjacent to HELAA Site 058



Source: QGIS using data from Google earth and Oxford City Council

- 3.84 This site is opposite a recently built out site (Temple Cowley Pool site 058) which was included in the HELAA GIS site data we were supplied but is no longer in the printed version of the HELAA report. This was a site of 0.45 ha and consists of 45 dwellings replacing a former swimming pool.
- 3.85 The site we highlight in Figure 3.10 above consists of a large car park with the band hut centrally located and is approximately 0.15 Ha in size.

- 3.86 It is neighbour to a, presumably, Category 3 employment site with car wash and car sales yard. This is approximately a further 0.13ha. There is also a large public house garden immediately adjacent to the site.
- 3.87 While doubtless a respected community facility there may be scope for relocation, or issues with the building quality that would have justified this site being assessed. Alternatively, the facility could have been re-provided as part of plans for the site's future redevelopment. At suburban density rates this site could represent a yield of around 7-8 dwellings at 50-60 dph and more than ten dwellings if a higher density development were brought forward akin to the adjacent Temple Cowley Pool site.

Employment Land Sites

- 3.88 37 sites were accepted as having potential for economic uses, 442 sites were rejected. The 37 sites represented a total site area of 380 Ha.
- 3.89 The accepted sites were based on positive availability, suitability and viability. Four sites acceptable for economic uses were stated to not be available for residential development. Six sites that were accepted for economic uses were not tested for residential use at all.
- 3.90 Category 1 and 2 employment sites are referenced as a policy constraint in the HELAA, despite the Plan's policy E1 indicating a possibility of re-development / intensification to include residential use in future.
- 3.91 There is no analysis of the potential housing contribution arising from Category 3 employment sites in the HELAA or in the Local Plan despite draft Policy E1's promotion of release and re-development of employment land sites for housing.
- 3.92 Background Paper BP6a affirms this at paragraph 5.22, stating that the Local Plan: 2040 recognises Oxford's acute housing need and as such supports the delivery of an element of housing on all of the city's employment sites. The same overall criteria exist for assessing proposals for residential development on the city's employment sites. For the city's poorly performing or located

Category 3 employment sites, their loss to residential development is supported in the Plan.

- 3.93 As we recommend in Section 6, one of the ways to assist bringing forward employment land sites for residential development is to publish a complete list of Category 3 employment sites / land and undertake a systematic assessment of their potential, including proactively understanding the existing business lifecycle and owner / occupier ambitions as well as identifying the potential for relocation of the use or its re-development incorporating housing.
- 3.94 To offer a very broad indication of possible housing capacity arising from release of Category 3 employment land, we could make some cautious assumptions. If therefore we assume that 20% of the 94¹⁰ total number of Category 3 sites become available for re-development during the plan period and that each site is 0.25 Ha (the minimum size for inclusion in the HELAA analysis or for site allocation in the Local Plan) this would offer a gross total of 5 Ha of land for re-development and a NDA total of 3.7 Ha of land. Assuming a suburban density level of 50 dph, this would result in a possible 187 additional dwellings capacity on the presumed Net Developable Area of Category 3 employment land.
- 3.95 Obviously, this approach is simply to provide an order of scale but the plain conclusion we reach is that there are opportunities within Category 3 employment land to generate additional new homes during the lifetime of the plan.

¹⁰ Not all 94 sites represent traditional employment spaces. The Category 3 list includes Barton Neighbourhood Centre. From the information supplied we have not always been able to identify occupier(s). This section illustrates a potential approach to offer an order of scale.

Sites Accepted as Suitable for Housing but not Allocated

- 3.96 52 sites in the HELAA were 'Accepted' overall as suitable, available and achievable for housing development but not subsequently allocated in the Local Plan.
- 3.97 33 of these sites (63% of the total) were noted as either having been built out or were under construction and therefore did not require allocation in the Plan itself.
- 3.98 A total of 14 sites were assessed as not being likely to provide at least ten dwellings. We highlight a number of them below where a housing capacity greater than ten dwellings may well be possible.
- 3.99 Nine of the 14 sites are of insufficient site size area to realistically deliver ten or more dwellings, so the HELAA's approach to these, counting them as small windfall sites appears to be appropriate.
- 3.100 Five of the 14 sites assessed are within the defined City or District Centres. This means that higher densities of residential development could be applied given their location and in accordance with the HELAA's approach to typology densities. One of these five city / district centre sites had a particularly small area of just 0.05 Ha and this has been excluded from Table 3.3 below which sets out four sites where OCC could re-investigate the potential for higher density development capable of delivering ten or more dwellings.

Table 3.3: Sites not Allocated Due to Housing Capacity being < 10 Dwellings

HELAA Ref	Location	Site Area (Ha)	HELAA Comment	Net Dev Area (Ha)	Dwellings @ 100 dph	Dwellings @120 dph
456	242-254 Banbury Road	0.18	Ground floor may be suitable but falls below the HELAA threshold since the upper floors have been developed. Unlikely to get 10+ dwellings in remainder of site.	0.17	17	21
611	1-3 Cambridge Terrace	0.10	Site is promoted by landowner; however any development would be unlikely to be able to achieve a net gain of 10+ dwellings as site is only 0.1 Ha.	0.10	10	12
616	Osney Warehouse (former #73) and St Thomas School House (former #72)	0.41	Site is suitable and available but unlikely to achieve net gain of 10+ units.	0.39	39	47
618	3, 3A, 4, 5 and 6 South Parade	0.18	Site is suitable and landowner has indicated intent to redevelop however no evidence that the site can accommodate 10 + units	0.17	17	21
Total Dwellings					83	100

Source: UDL and CCL calculation

3.101 In addition, we highlight below further sites where an inconsistent approach appears to have been taken in the HELAA.

Figure 3.11: Valentia Road (Site 329)



Source: QGIS using data from Google earth and Oxford City Council

- 3.102 The Valentia Road (Site 329) shown in Figure 3.11 is owned by OCC. It was concluded in the HELAA to be 'Accepted' for housing on part of the site, although the HELAA does not identify which part or how much housing.
- 3.103 The prevailing character of the area is suburban residential. If half of the site was assumed to be available for development this would represent between 19 - 23 new dwellings at 50 - 60 dph.

Figure 3.12: Sites Adjacent to the East of Osney Bridge, to the North and South of Botley Road (Site 613)



Source: QGIS using data from Google earth and Oxford City Council

- 3.104 The Site shown in Figure 3.12 is currently in use as a hotel (with less than 10 rooms), with residential and retail activities also. The HELAA remarks that the Site is suitable and available within the Local Plan time period.
- 3.105 The landowner has indicated that the Site has potential for an increased density of development. The HELAA assessed significant heritage constraints that would limit capacity, potentially implying that conversion of the existing ten bedroom hotel was the only option considered. It is close to but not in the main City Centre area.
- 3.106 Taking the two sites together gives a total site area of around 0.33 Ha and a NDA of 0.25 Ha that could provide a possible net dwelling yield of between 12 and 15 dwellings at a density of 50 - 60 dph. Any future residential

development would of course need to be determined in terms of net gain given there is some existing residential use on part of the Site now.

Figure 3.13: Jesus College Playing Field – North (Site 234)



Source: QGIS using data from Google earth and Oxford City Council

- 3.107 HELAA Site 234 as shown in Figure 3.13 above is some 2.53 HA in size (NDA of some 1.6 Ha) and 'Accepted' as suitable for residential development in the HELAA. The HELAA comments that the Site is available and suitable subject to sports being re-provided.
- 3.108 HELAA sites 026 and 032 are immediately south of Site 234 and are adopted site allocations with confirmed landowner intentions. These sites are expected

to be developed within the Local Plan period and have been carried forward as Allocation SPE17.

- 3.109 There appears to be no proactive approach to overcoming the constraint identified in the HELAA (in accordance with the PPG) that would allow Site 234 to be unlocked and offer yield of approximately 82 - 98 dwellings at 50 - 60 dph.

Summary

- 3.110 Drawing the above together, we conclude that the four sites not allocated due to their size (considered in the HELAA to have a capacity of under ten dwellings) and the three further sites we have highlighted could contribute additional capacity if proactively brought forward and allocated in the Local Plan.

Table 3.4: Capacity from Sites Acceptable as Housing but not Allocated (Dwellings)

	Low Range	High Range
Unallocated (but Accepted) Sites Capacity	194	233

Source: UDL and CCL calculation

- 3.111 Unlike other categories these figures are not wholly additional housing capacity as they are likely to have been treated as part of the windfall allowance in the HELAA work and would therefore fall within Appendix C of the HELAA report. However, the Local Plan and supporting evidence are not clear what assumptions they have made as to the contributions these sites would make to their expected windfall supply as Appendix C does not list the anticipated capacity.

Summary Conclusions

Our analysis of the overall HELAA results raises the following headline issues and conclusions:

- a) despite an encouraging Local Plan policy position, 27 existing employment sites were not tested for residential use through the HELAA at all, despite being identified in the sources of supply. This is missed opportunity that Oxford City Council should address;
- b) the extent of sites being 'Rejected' by the HELAA due to their availability is stark. 156 sites identified as suitable are reduced to only 98 sites when availability is also factored in; a reduction of 58 sites. Put simply, lack of availability on 58 otherwise suitable sites led to their ultimate rejection by the HELAA;
- c) landowner intentions are reported in a rudimentary or cursory fashion within the HELAA and there is little available evidence to indicate just how strenuous or extensive the efforts have been in all cases to obtain landowner indications of availability or to address these matters in the context of a Local Plan period that extends for 20 years to 2040;
- d) indeed, there are no published log records of contacts made, discussions held, consistency in the form and recording of contact (for example a standard pro-forma approach), or understanding of the timing of when landowner or developer contact was made and updated;
- e) the importance of availability of sites and accurate landowner intentions is critical in securing housing land supply in the context of Oxford's constraints. The clear result here is that landowner intentions significantly reduce the potential for housing supply through the HELAA;
- f) it is apparent that despite some of the 'Rejected' sites being a focus in previous plan-making, there is little evidence of a proactive approach since then to assist in identifying the actions that could be taken to

overcome constraints and bring sites forward (which the PPG expects at paragraph ID 03-21);

- g) this is concerning both in terms of ensuring the HELAA's work is consistent with the NPPG particularly regarding maximising housing delivery in the context of the purported significant future housing needs of Oxford;
- h) we have identified and grouped sites into four broad themes to aid further review:
 - o **Taking a More Proactive Approach** where a more proactive or intervention-led approach could help unlock sites for development;
 - o **Residential Use Not Tested** where the potential for residential development was not tested in the HELAA;
 - o **Overly Cautious HELAA Appraisal** where the HELAA's assessment can be considered to have been overly cautious; and
 - o **Estate Regeneration Opportunities** where planned and programmed housing estate regeneration or intensification could yield a greater intensity of residential use;
- i) the table below provides a summary of the potential additional housing capacity that might be possible arising from unassessed and rejected sites;

	Low Density Range	High Density Range
Rejected Sites capacity	2,967	3,593
Unassessed Sites capacity	319	382
Total Dwellings	3,286	3,975

- j) it is noted and acknowledged that more than half the additional housing capacity from the first two categories are linked to the substantial Southfield Golf Course (Site 292);
- k) we set out our estimated capacity from 'Accepted' but unallocated sites separately in the table below as, while the Local Plan will have estimated some capacity from the seven sites we highlight, we cannot

make a direct comparison to that figure. For example, while the HELAA Appendix C identifies sites as suitable for housing it does not provide an actual achievable capacity, just that the sites could provide between 1-9 dwellings.

	Low Density Range	High Density Range
Unallocated (but 'Accepted') Sites Capacity – Total Dwellings	194	233

- i) therefore the following table brings the potential estimated additional capacity together from all the elements set out in Section 3, illustrating the possible scale of potential between 4,267 and 7,358 additional dwellings depending on the density or level of release assumptions used.

Source	Dwellings (Lower Density Range)	Dwellings (Higher Density Range)
Rejected Sites Potential Capacity	2,967	3,593
Unassessed Sites Potential Capacity	319	382
Unallocated (but 'Accepted') Sites Capacity	194	233
Sub-Total (A)	3,480	4,208
	Low Levels of Release (20% of Sites)	Higher Levels of Release (80% of Sites)
Availability / Rejected Sites	600	2,400
Category 3 Employment Sites	187	750
Sub-Total (B)	787	3,150
Overall Total (A+B)	4,267	7,358

4. Proposed Housing Site Allocations

Introduction

- 4.1 In this section we examine the Oxford Local Plan: 2040's proposed housing site allocations. The section looks at the process through which sites have been selected for allocation and then evaluates the allocation proposals themselves in more detail.

Site Selection Process

Approach to Site Selection

- 4.2 The site assessment process taken to identify site allocations is contained in Background Paper 15b Site Assessment Process (Site selection and allocation) which forms part of the evidence base for the Local Plan 2040.
- 4.3 The Background Paper is comprised of two elements and is complemented by Background Paper 15a Site Assessment Process (Urban Design and Assessment of Housing Capacity) which explains how the residential site allocations have been assessed and the methodology and assumptions which have been applied in the context of housing capacity / density and design. Both papers are supported by Appendices.
- 4.4 Drawing on the sites identified in the interim HELAA (2022) which included the existing site allocations in the Local Plan 2036, Background Paper 15b explains that a three stage process was undertaken to assess the suitability of sites for allocation at the Preferred Options stage. The stages related to the following:
- Stage 1 Assessment: Exclusion of sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints.
Sites were rejected if they related to the following:
 - i) A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI);

- ii) Greenfield site in Flood Zone 3b;
 - iii) Less than 0.25 hectare in area;
 - iv) At an advanced stage in the planning process (i.e. development has commenced).
- Stage 2 Assessment: Assessment against Sustainability Appraisal objectives. All sites passing Stage 1 were considered against the Sustainability Appraisal objectives and criteria related to physical (accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery, location in a deprived area) and environmental (land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure) criteria.

The assessment proformas for each site were published as part of the evidence base (with the adopted assessment template attached at Appendix A of Background Paper 15a).

Sites were rejected if they were:

- i) Considered part of Oxford's Core Green Infrastructure network;
or
 - ii) Had no clear opportunity to achieve acceptable vehicle and pedestrian access.
- Stage 3 Assessment: Consideration in relation to their deliverability and compatibility with the Local Plan Preferred Options Strategy. At this stage, sites were rejected if:
 - i) Landowner intentions indicated that the site would not come forward during the plan period (i.e. before 2040);
 - ii) There was serious conflict with the NPPF / Local Plan Preferred Options Strategy and no mitigation was possible.

- 4.5 Appendix 1 of Background Paper 15b specifically lists the sites which passed the three stage process and identifies the options for those sites assessed at the Preferred Option stage.
- 4.6 For those sites not taken forward, in the majority of cases the sites were either already subject to commencement of development on site or updated information on landowner intentions indicated that the site would be unavailable.
- 4.7 The shortlisted sites formed the basis for further detailed assessment to identify the list of sites subsequently taken forward as allocations and detailed policy drafting in the Pre-submission Draft Local Plan 2040.
- 4.8 As part of the assessment process, this stage included the following:
- a) individual site assessment against the policy approaches in the Plan including the Sustainability Appraisal;
 - b) review of landowner intentions drawing on consultation response and additional contact with landowners;
 - c) protecting environmental designations – SACs, SSSIs, Local Nature Reserves, Local Wildlife Sites, Wildlife Corridors and other sites with biodiversity interest (those with protected species);
 - d) protecting playing pitches and allotments (unless criteria could be met related to re-provision and/or improvements to local provision, or evidence of surplus requirements); and
 - e) protecting community facilities (allowing for loss under certain circumstances).
- 4.9 This stage of work led to the identification of a small number of additional sites for assessment arising from landowner engagement and Call for Sites submissions although the sites were not selected for allocation. The sites are identified at Appendix 2 of Background Paper 15b.
- 4.10 Alongside the site selection process, the Site Allocation Policies have been informed by bespoke urban design assessments which Background Paper 15a

states were undertaken for many of the sites and based on an assessment tool developed by the City Council's in house Design and Heritage Team (the relevant urban design framework template included at Appendix 1 of the Background Paper).

- 4.11 These appraisals have informed the minimum number of residential dwellings (or dwelling equivalent) expected to be delivered for the site allocation and represent a specific capacity for each assessed site which takes account of relevant site constraints. This detailed site specific approach provides a more realistic estimate of housing capacity rather than the adoption of a theoretical or typology assumption of density.
- 4.12 The housing output numbers identified are the minimum expected and not a cap with a recognition that a higher capacity could be secured at planning application stage subject to compliance with other Plan policies. In addition, the housing capacity identified for assessed sites are reported to have been tested with the relevant landowner for the sites in question.
- 4.13 For those site allocations with the benefit of planning permission, the background paper outlines that an urban design assessment may not have been undertaken with the permission details informing capacity. It is also relevant that the decision to undertake an urban design assessment was undertaken on a 'case by case basis where it could add value to the drafting of site allocation policies' (see paragraph 6.15, Background Paper 15a).

Conclusions on Site Selection Process

- 4.14 In assessing the site selection process undertaken by OCC and documented in the supporting evidence base of the constituent elements of Background Papers 15a and 15b respectively, the overall approach appears thorough and comprehensive.
- 4.15 The site allocations are based on the findings of the three stage process related to national policy and physical/environmental constraints; the objectives and criteria of the Sustainability Appraisal, documented in individual assessment proformas (which form part of the published evidence base); and a deliverability assessment including landowner engagement to ascertain

realistic intentions for development. Cumulatively, this process ensures an extensive testing of the HELAA sites.

4.16 There are however specific concerns we have with respect to the approach adopted and the supporting documentation associated with the site selection process:

- a) with respect to Background Paper 15b it remains unclear whether this is the ‘final’ version given that the published version is marked with track changes. This may be a formatting error but equally as part of the supporting evidence base, it is important to ensure the final complete version is published and available.
- b) the urban design capacity assessments which are said to have informed site capacity and relevant site allocation policies undertaken for some sites on a “case by case basis” (setting aside those with existing planning consent) raises the question as to why capacity has not been assessed for all site allocations identified for residential uses using these assessments?
- c) critically, there is an absence of any supporting evidence related to the urban design capacity assessments undertaken for the individual site allocations. While the assessments were undertaken by OCC urban design and policy officers to inform internal discussions with respect to the site allocation policies and the supporting text, it is understood that OCC have not and do not intend to publish the urban design assessments with information retained in-house. This is a concern and prevents a thorough, robust critique of site capacity estimates that accompany the Local Plan 2040 site allocations.

The Proposed Site Allocations

Overview

- 4.17 The final set of proposed site allocations are set out in Chapter 8 of the Local Plan 2040 and are presented as individual policies for each site. In total, the Plan identifies **50** site allocations.
- 4.18 The allocations are spatially distributed across four quadrants which divide the city (North Area, South Area, East Area and West/ Central Area) and which are identified in the Infrastructure Delivery Plan (**IDP**) and shown at Figure 8.1 of the Plan.
- 4.19 The Plan further identifies five Areas of Focus (**AoF**) across Oxford which represent areas where change through new development is likely to occur during the Plan period.

Spatial Arrangement of Housing Allocations

- 4.20 The AoF relate to the IDP quadrants and set out a series of policy principles for development in each specific focus area. This spatial framework sets the basis for the distribution of the site allocations across the city and differentiates allocations which are located either within or outside the AoF's.
- 4.21 In summary, the site allocations are distributed across the city based on the following spatial context:
- **North Infrastructure Area** includes the Northern Edge of Oxford AoF and North Area proposed development sites (shown at Figure 8.3 of LP2040) – **total of 3 site allocations;**
 - **South Infrastructure Area** includes the Cowley Branch Line and Littlemore AoF and South Area proposed development sites (shown at LP2040 Figure 8.5) – **total of 18 site allocations;**
 - **East Infrastructure Area** includes the Marston Road and Old Road AoF and East Area proposed development sites (shown at LP2040 Figure 8.8) – **total of 21 site allocations;** and

- **West and Central Infrastructure Area** which contains two AoFs: the North of the City Centre AoF and West End and Botley Road AoF, and the West and Central Area proposed development sites (shown at LP2040 Figure 8.9) – **total of 8 site allocations**.
- 4.22 The majority of the site allocations relate to residential, or mixed uses including residential development. For certain sites, the site allocation policies also expressly identify student accommodation and / or employer linked affordable housing as part of the residential use or as a specific use, especially for health or academic related sites.
- 4.23 Given the established presence and landownership of the academic sector in the city associated with the University of Oxford colleges, Oxford Brookes University and Ruskin College (University of West London), it is not unsurprising that a substantial number of the site allocations are identified for academic related uses together with student accommodation and / or residential.
- 4.24 Similarly, the city is home to a number of hospital and health related sites such as the John Radcliffe, Warneford and Churchill hospitals together with the Nuffield Orthopaedic Centre, all of which are identified as Category 1 Employment Sites together with other NHS and local community sites. Together these sites are identified as specific allocations for a mix of hospital, healthcare and training uses but are also identified to contribute to residential, including through affordable, student and employer linked housing.
- 4.25 A total of four Category 1 Employment Sites (ARC Oxford; Mini Plant Oxford; Oxford Science Park, and Unipart), all located within the Cowley Branch Line and Littlemore AoF, are identified as site allocations with the primary focus on a continued contribution to employment land supply in the city through potential for intensification, modernisation and new development for Class B2, Class B8 and Class E (office, research and development, light industrial) uses. In these cases, the site allocation policy outlines that an element of residential development will be supported in accordance with the provisions of Policy E1. An additional allocation at Botley Road retail park is identified for employment uses.

4.26 The majority of the site allocations are rolled forward from the Local Plan 2036 with only four additional 'new' site allocations in the draft Local Plan 2040 (two of which were identified in the adopted Plan's evidence base). In addition, the allocation at Northern Gateway (Policy SPN1), one of the largest housing and employment (also a Category 1 employment) sites in Oxford, was formerly subject to the Northern Gateway Area Action Plan (**NGAAP**) which has now been superseded by the site allocation policy and where development is currently underway.

Scale of the Site Allocations and Proposed Housing Capacity

4.27 Overall, the total area of the site allocations is **408.84** Ha although the quantum is significantly inflated by a small number of large sites, such as the Northern Gateway, the Category 1 employment sites and the hospital sites. The realistic developable area is therefore considered to be lower once account is taken of these individual site characteristics.

4.28 Analysis of the Local Plan 2040 site allocations policies identifies a **minimum housing capacity of up to 4,297 dwellings**. For a small number of sites, a range of capacity is identified in to reflect the potential for higher site capacity associated with relocation of on-site sports facilities etc. This results in an identified minimum housing capacity range of **4,077 – 4,297 dwellings**.

4.29 The housing numbers are expressed as a minimum net-gain, and in the context of new student bed spaces, a ratio of 2.5 student bed spaces is considered the equivalent of 1 new home, and for other communal accommodation, a ratio of 1.8 bed spaces is equivalent to 1 new home (in accordance with the national Housing Delivery Test approach).

4.30 The breakdown of minimum housing capacity by area as derived from the site allocations is summarised below:

- North Infrastructure Area (Northern Edge of Oxford AoF and North Area proposed development sites): **412 – 452** dwellings;

- South Infrastructure Area includes the Cowley Branch Line and Littlemore AoF and South Area proposed development sites: **1,594 – 1,774** dwellings;
- East Infrastructure Area includes the Marston Road and Old Road AoF and East Area proposed development sites: **1,202** dwellings; and
- West and Central Infrastructure Area which contains two AoFs: the North of the City Centre AoF and West End and Botley Road AoF, and the West and Central Area proposed development sites: **869** dwellings.

4.31 As previously discussed, the process and methodology for estimating housing capacity (as set out in Background Paper 15a) has informed the minimum housing numbers. In the majority of cases, the identified minimum capacity is consistent with the HELAA's appraisal, and for some allocations the housing capacity appropriately accords with recent planning permissions or current planning applications that remain to be determined.

Conclusions on Overall Site Allocations

4.32 Overall, our review of the site allocations concludes that the majority of the proposed allocations represent appropriate opportunities for residential development, whether in full or as an element of mixed uses, with reasonable identified minimum housing capacities, including those consistent with existing planning permissions and the HELAA evidence base.

4.33 It is recognised the majority of sites have been tested previously through the Local Plan 2036 process and some more recently via the planning application determination process. On this basis we do not raise concerns with the majority of the proposed development allocations or their estimated housing capacities.

4.34 We have however identified a number of inconsistencies and areas of concern, particularly with regard to certain themes or for specific sites, and expand on these issues in the following sub-sections.

Opportunities for Additional Housing Supply on Proposed Allocation Sites

- 4.35 There are number of proposed allocation sites where a higher level of housing capacity could be secured if a more proactive approach to housing capacity and density were adopted.
- 4.36 Many sites have been subject to an urban design assessment by OCC, but that information is unpublished and our comments are presented in the context of site examples where we consider an uplift in capacity could be a realistic possibility and explored further by OCC.
- 4.37 The relevant allocation sites relate to the following:
- Kassam Stadium and Ozone Leisure Park (Policy SPS2);
 - Overflow Car Park, Kassam Stadium (Policy SPS3); and
 - Jesus and Lincoln College Sports Ground (Policy SPE17).

Kassam Stadium and Ozone Leisure Park (Policy SPS2)

- 4.38 The Kassam Stadium and Ozone Leisure Park site (8.48 Ha) is identified for a minimum delivery of 275 homes under Policy SPS2 but only if the stadium is replaced elsewhere and that part of the site becomes available. Commercial uses are supported within the area of the Ozone Leisure Park. The supporting justification to the policy identifies an assumed density of 60 - 70 dph across the site.
- 4.39 Subject to a stadium relocation (it is understood that negotiations remain ongoing between Oxfordshire County Council and Oxford United Football Club (OUFC) that could facilitate a relocation to council-owned land elsewhere), it is considered highly likely that an increased density (70+ dph) could be adopted.
- 4.40 This reflects its proximity to the Grenoble Road strategic allocation to the south, the size of the brownfield site and the scope for an element of additional height taking account of the established scale and height associated with the Ozone Leisure Park buildings and the Kassam Stadium itself, together with the adjoining hotel (Holiday Inn Express), and the Oxford Science Park to the west. The site is further considered a Gateway location both in the context of the

existing character of the area and the likely future changes in the Grenoble Road area.

4.41 To illustrate the realistic opportunity to increase capacity at the site, it is considered a higher density in the range 70 – 90 dph could be delivered to account for the Gateway characteristics of the locality. Adopting a net developable area of 4.13 Ha (and retaining the Ozone Leisure Park and some car parking), it is estimated a minimum housing capacity in the **range 289 – 371 units** could be delivered based on the following densities, and assuming relocation of the stadium:

- 70 dph – 289 dwellings;
- 80 dph – 330 dwellings; and
- 90 dph – 371 dwellings.

4.42 The uplift in minimum housing capacity identified by this indicative exercise, considers the potential for a range of **14 – 96 net additional** dwellings (above the level proposed in the draft Local Plan), depending on density, at the Kassam Stadium site.

Overflow Car Park, Kassam Stadium (Policy SPS3)

4.43 The overflow car park site (2.29 Ha) to the north west of the stadium site is allocated for a minimum of 77 homes and identified at a suburban density of 50 - 60 dph which appears low.

4.44 Given the nature of adjoining residential and commercial uses, and the comments relevant to the Kassam Stadium site including the Gateway nature of the area, it is considered a higher density in the range 70 – 90 dph and comparable to that illustrated for the Kassam Stadium site could be adopted in the Plan to better reflect the current characteristics of surrounding uses and future changes in the area.

4.45 If a more ambitious density range of 70 – 90 dph were used, and based on an indicative net developable area of 1.71 Ha, it is estimated the car park site

could support a minimum housing capacity in the **range 119 – 153 units**, based on the following assumptions:

- 70 dph – 119 dwellings;
- 80 dph – 136 dwellings; and
- 90 dph – 153 dwellings.

4.46 This represents an indicative uplift to the proposed minimum housing capacity of between **42 – 76 dwellings**, depending on density, when compared to the site allocation capacity.

Jesus and Lincoln College Sports Ground (Policy SPE17)

4.47 The two adjoining open air sports facilities sports (serving Lincoln College and Jesus College) total 5.42 Ha and are identified at Policy SPE17 for a minimum of 52 homes (including graduate accommodation).

4.48 The policy outlines that the homes may come forward as a minimum of 26 dwellings on each land parcel in the ownerships of Jesus College and Lincoln College. No density assumption is provided in the supporting justification to the policy although the overall capacity is related to the potential for re-provision of sports facilities (including scope for off-site provision).

4.49 It is noted that the two sites were identified in the Local Plan 2036 albeit under two separate allocations (Policy SP40 Jesus College and Policy SP43 Lincoln College respectively), which cumulatively identified a higher minimum housing capacity of 118 units, split between 28 units (minimum) at Jesus College and 90 unit (minimum) at Lincoln College. This difference in minimum capacity between the Local Plan and Local Plan 2040 may reflect a change in intentions towards on-site sports facility provision but equally highlights the likely opportunity for higher housing capacity which exists if a proactive approach towards playing and sports facility provision is adopted.

4.50 If the previous capacity were adopted for these two sites, a minimum uplift of **66 dwellings** could be delivered at site allocation SPE17.

- 4.51 In relation to the other site allocations, it is fully recognised the allocations adopt minimum capacity numbers (where identified) and offer the potential for higher delivery at planning application stage (subject to compliance with other Plan policies).
- 4.52 We have also previously commented that the majority of the site allocations are considered broadly reasonable in housing capacity terms with some of the site allocations (either in full or part of their area) informed by planning consents. Examples include Northern Gateway (Policy SPN1); Knights Road (Policy SPS10) and Blackbird Leys Central Area (part) (Policy SPS9); Headington Hill Hall & Clive Booth student village (Policy SPE3); Hill View Farm (Policy SPE10); Land West of Mill Lane (Policy SPE11), and Thornhill Park (Policy SPE15).
- 4.53 It is further noted that the supporting justification to some of the site allocations outlines the importance of the need for a comprehensive site masterplan or regeneration plan. This positive promotion by OCC recognises the complexity of specific sites to ensure a holistic approach to site capacity and delivery with a coordinated approach recommended for sites including Blackbird Leys Central Area (Policy SPS9); Templars Square (Policy SPS12) and the Nuffield Sites (Policy SPCW6) together with some of the hospital sites such as Churchill Hospital (Policy SPE6) and Warneford Hospital (Policy SPE8). The output of these masterplans should be expected to identify additional capacity for some site allocations moving forward.

Proposed Allocation Sites Where Residential is Supported but No Housing Supply Identified

- 4.54 Alongside the review of identified housing supply, there is evidence that some of the site allocations are not supported by an identified housing capacity despite residential use (including student accommodation and employer linked housing) being identified as an acceptable land use.
- 4.55 As a consequence, a comprehensive estimation of housing capacity is not currently provided for the Local Plan 2040 site allocations which under plays the potential level of total housing supply.

- 4.56 A total of 12 allocations identify no minimum housing capacity. These sites can be categorised as primarily the Category 1 Employment Sites associated with the major commercial / business sites (which are supportive of an element of residential in accordance with Policy E1) and the hospital and medical research sites at Churchill, Warneford and John Radcliffe Hospitals and Nuffield Orthopaedic Centre (Policy SPE7).
- 4.57 Other sites where there is no stated housing in the Local Plan include the local community healthcare sites at Manzil Way Resource Centre (Policy SPE13) and Slade House (Policy SPE14), the educational facility at Oxford Brookes University, Marston Road Campus (Policy SPE4), and Canalside Land at Jericho identified for residential led mixed uses (Policy SPCW4).
- 4.58 It remains unclear why no housing capacity is identified for these sites if the policy basis is to allow housing to come forward on these sites during the plan period. This is particularly relevant for a number of the aforementioned sites which are identified in the 2023 HELAA with housing capacity (derived from HELAA Appendix B) but where the corresponding capacity is not reported in the site allocation policy itself.
- 4.59 This inconsistency fails to take account of **766 dwellings** which the HELAA identifies as the housing capacity at the following allocation sites:
- John Radcliffe Hospital – 618;
 - Warneford Hospital – 70;
 - Manzil Way Resource Centre – 10;
 - Slade House – 50; and
 - Canalside Land, Jericho – 18.
- 4.60 Ultimately while ensuring that the site allocations robustly identify housing capacity and seek to maximise the opportunities for residential uses where possible, it is recognised that many of the aforementioned non-housing capacity sites will continue in their primary role and function for employment or health uses.

- 4.61 This is especially relevant for the large Category 1 Employment Sites associated with office, research and development and industrial activities which are integral to the economic growth and prosperity of the city and where it is perhaps unrealistic for the sites to be considered for significant residential given their importance and contribution to employment land supply.
- 4.62 Similar principles apply in respect of the hospital and healthcare sites which remain the operational focus for these specialist activities although recent evidence of employer linked housing at a number of the hospital sites indicate the realistic potential for such housing delivery. This is supported by the draft Local Plan's policies which indicate that an element of housing would be acceptable in principle on such sites.
- 4.63 A more efficient use of land could therefore offer opportunities for an element of residential on the large hospital / health related sites through intensification and / or redevelopment, as envisaged by the site allocation policies. Subject to development which does not prejudice the primary operational use of the hospital / health sites, it is considered likely these sites could positively contribute towards housing capacity.
- 4.64 A further issue relates to the inconsistent approach to housing density assumptions contained in the supporting justification to some of the site allocation policies. Overall, density assumptions are reported for only a minority of sites. It remains unclear why this partial approach has been adopted and, in many ways, reflects our concerns reported in relation to the unavailability of the urban design assessments which have informed the site allocation policies and minimum capacity numbers.

Summary Conclusions

Our review of the proposed housing site allocations in the draft Local Plan has identified the following:

- a) the evidence base contained in Background Paper 15a and 15b outlines the approach to the site assessment process which has identified the site allocations and the housing capacity;

- b) the three stage process to site selection comprising assessment against national policy, the Sustainability Appraisal and landowner engagement appears comprehensive and thorough;
 - c) bespoke urban design assessment have been undertaken to inform the 'minimum' housing capacity of sites although this process has not assessed all the site allocations identified for residential uses. In addition, it is concerning that the assessments have not been published despite forming a crucial element of the site assessment process;
 - d) there are 50 site allocations identified in the draft Plan with the majority of the allocations rolled forward from the existing Local Plan 2036;
 - e) the total site area of the allocations extends to 408 Ha although this land area is inflated by a small number of large sites, especially Category 1 employment and hospital / health related sites, which identify scope for an element of residential uses;
 - f) a 'minimum' housing capacity in the range 4,077 to 4,297 dwellings is identified across the site allocations;
 - g) overall, the majority of the site allocations are considered to represent appropriate opportunities for residential, whether in full or as part of mixed uses, with reasonable identified 'minimum' housing capacities;
 - h) notwithstanding this, we have identified a number of site allocations where opportunities for a higher level of 'minimum' housing capacity are considered to exist, drawing on a number of themes:
 - o a proactive approach to higher density assumptions with opportunities identified at the following sites: Kassam Stadium/ Ozone Leisure Park; Overflow Car Park Kassam Stadium, and Jesus and Lincoln College Sports Ground sites.
- Cumulatively these three sites are estimated to have the potential to deliver an additional (above what is already proposed in the draft Local Plan) minimum housing capacity of 122 – 238 dwellings;

- o identification of 'minimum' housing capacity at all sites where residential use is supported given that 12 site allocations have no identified housing capacity set out in the Plan. It is noted the HELAA identifies 766 dwellings potential for some of the sites which have no identified housing capacity shown in the draft allocation policies of the Local Plan 2040.

- i) the table below provides a summary of the potential additional housing capacity that could be possible arising from higher density assumptions and unidentified minimum housing capacity sites;

	Lower Density Range	Higher Density Range
Additional Capacity from Three Proposed Allocation Sites	122	238
Identification of a Minimum Housing Capacity at all Sites Where Residential Use is Supported (data from HELAA)	766	766
Total Dwellings	888	1,004

- j) therefore the following table brings the total potential estimated additional capacity together from all the elements set out in Section 3 and Section 4, illustrating the possible scale of potential depending on the density or level of release assumptions used.

Source	Dwellings (Lower Density Range)	Dwellings (Higher Density Range)
Rejected Sites Potential Capacity	2,967	3,593
Unassessed Sites Potential Capacity	319	382
Unallocated (but 'Accepted') Sites Capacity	194	233
Sub-Total (A)	3,480	4,208
	Low Levels of Release (20% of Sites)	Higher Levels of Release (80% of Sites)
Availability / Rejected Sites	600	2,400
Category 3 Employment Sites	187	750
Sub-Total (B)	787	3,150
Proposed Allocation Sites Additional Capacity	122	238
Identification of a Minimum Housing Capacity at all Sites Where Residential Use is Supported (data from HELAA)	766	766
Sub Total (C)	888	1,004
Overall Total (A+B+C)	5,155	8,362

5. Local Plan Policies Review

Introduction

- 5.1 This section turns to a wider review of the draft Oxford Local Plan: 2040 policies that are relevant to the supply of housing delivery.
- 5.2 The section considers the extent to which the policies are sufficiently positive, proactive and flexible to ensure that housing delivery and site capacities are maximised in the context of securing sustainable development.

Emerging Oxford Local Plan: 2040

- 5.3 The Submission Draft Oxford Local Plan: 2040 (Regulation 19) was published for consultation in November 2023.
- 5.4 The Local Plan: 2040 will, when adopted, supersede the Local Plan: 2036 and other relevant parts of the existing development plan including the Northern Gateway Area Action Plan. It includes an updated vision, objectives, policies and proposed development site allocations for the period 2020 – 2040.

Policies Relevant to the Supply of Housing

- 5.5 There are a number of draft Local Plan policies that are relevant to the supply of housing in Oxford in the plan period. In this sub-section we consider the consistency of these policies with the Plan's stated aim of prioritising housing development set out in Policy S1 and supporting text¹¹.

¹¹ Paragraph 1.7 of the Local Plan: 2040 establishes that “*the overall priority use for new sites is to deliver homes to meet housing needs (including on some employment sites), whilst also ensuring that the infrastructure, employment, education, and health needs for the city are met*”. This is reinforced at paragraph 2.9 which further indicates that delivery of housing is a priority and the Local Plan's strategy is to maximise housing delivery while balancing protection of other important land uses.

Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development)

- 5.6 Draft Policy S1 aims to achieve sustainable development and growth in the delivery of homes, jobs and services.
- 5.7 The draft policy states at bullet (d) that there is a focus on new employment development that supports Oxford's national and international role in research and development on existing sites already in that use and prioritising housing elsewhere.
- 5.8 The draft policy states that housing is a priority for sites other than those where there is a national or international economic development role.
- 5.9 It therefore provides a general and broadly positive approach to supporting new housing development.

Policy H1 (Housing Requirement)

- 5.10 Draft Policy H1 sets out the housing requirement for the plan period totalling a minimum of **9,612** new dwellings (**481** dpa). The Policy states that housing capacity has been maximised through (a) site allocations, (b) promoting efficient use of land and development including the highest appropriate densities and building heights; and allowing (c) "*an element of housing on all employment sites if suitable*".
- 5.11 Setting aside the total planned requirement in Oxford itself, which is significantly below the purported overall future housing need identified in the HENA study, elements (a) and (b) of the policy are simply statements rather than policy requirements or objectives that actually support the delivery of housing supply. For the reasons and drawing from the analysis set out elsewhere in this Oxford Capacity Review report it is not clear that the housing capacity of the city has actually been maximised.
- 5.12 Turning to element (c) of the policy, this is a further statement that housing could be appropriate on defined employment sites (presumably the Category 1 – 3 sites outlined in Policy E1). It is however a relatively limited expression of support for residential development of employment land referring only to "*an*

element” of housing rather than supporting the re-use or active intensification of employment land for housing purposes, especially in the context of the Plan’s stated aim to make housing provision the priority.

Policy H2 (Delivering Affordable Homes)

- 5.13 Draft Policy H2 is concerned with the provision of new affordable housing in the context of Oxford’s housing market demonstrating continued high levels of unaffordability for purchase or rent. Paragraph 2.10 indicates that this is a result of high land values, reducing land availability (i.e. a shortage of identified land supply) and therefore a shortage of housing stock.
- 5.14 The draft policy expects affordable housing contributions to be on-site as part of larger development schemes (10+ dwellings) and financial contributions in lieu in other cases (smaller sites or those where on-site provision may not be appropriate such as retirement accommodation). Social Rented tenure housing is the priority tenure for affordable housing and the policy requires 80% of the total affordable housing requirement as Social Rented with the remaining 20% as Intermediate tenure housing (noting First Homes are excluded from this).
- 5.15 Table 9.33 of the HENA (2022) identifies a total social and affordable housing rented need of **740** dpa. A further analysis, excluding existing households is shown at Table 9.34 of the HENA, indicating an affordable housing need of **383** dpa.
- 5.16 Reading the policy overall, it concludes that the requirement for 40% affordable housing contribution on-site or via contributions in lieu is unlikely to either boost or restrict the overall supply of housing sites in Oxford. The policy does include provision for a viability assessment process to take account of individual local and site specific development circumstances and this includes a ‘cascade’ approach to allow for lower levels of contribution until a threshold / tipping point is reached in terms of site viability.
- 5.17 It is therefore important that the operation of this policy is undertaken with a careful and thorough view of site development viability in all cases to support rather than restrict housing delivery.

Policy H5 (Employer-linked Affordable Housing)

- 5.18 Draft planning policy H5 is concerned with the development of new housing for rent linked to specific Oxford-based employers. The policy is specific to identified sites and it disapplies the standard affordable housing provision requirements (Policy H2) other than for any market housing proposed on the site or in the circumstances that the identified employer determines that they no longer have a need for the housing.
- 5.19 The policy aims to provide a direct link between securing rental housing provision and the objectives to grow and support key employers, education providers and business sectors. The approach was introduced in the existing Local Plan: 2036 to increase delivery of affordable housing.
- 5.20 The effect of the policy is limited to specific circumstances and sites and reflects an alternative approach and focus on delivering affordable rented housing rather than supporting an overall increase in housing land supply. This is because the sites proposed for Employer-linked Affordable Housing are otherwise likely to be appropriate for market housing (the policy itself allowing for the eventuality of market housing forming an element of the development on each site).
- 5.21 It is concluded that the policy is supportive of securing needed housing in Oxford for particular employers and sectors including those involved in front-line public services, education and certain business sectors, but is not anticipated that it would generate an overall increase in housing site capacity or supply beyond that which could otherwise arise.

Policy H6 (Mix of Dwelling Sizes (Number of Bedrooms))

- 5.22 Draft Policy H6 establishes a series of dwelling size mixes (expressed as number of bedrooms). It states that applications for residential development will need to deliver a mix of dwelling sizes that respond to the site context and local needs.
- 5.23 For market housing, the policy does not establish a particular size of dwellings mix, but there are particular size mixes for affordable housing for rent and for

affordable home ownership housing with different proportions specified for each. These are applicable to schemes for 25+ dwellings or on sites of > 0.5 Ha outside the city centre or district centres.

- 5.24 The size mix for both affordable rent and affordable ownership is aimed towards the provision of smaller size dwellings (one-bed and two-bed) with some emphasis on three-bed accommodation (between 20 – 35% of the total) and only 6 – 15% for four-bed or larger homes.
- 5.25 Considering the policy with respect to supporting increased housing capacity, the emphasis towards smaller size affordable dwellings is capable of supporting a larger overall quantum of dwellings and greater intensity of use of land on some sites (those outside city and district centres) which is broadly beneficial to securing efficient use of housing land supply. The emphasis in this policy operating outside of city and district centres is also an important factor as it reflects the potential for those locations to bring forward much higher density residential development which inevitably require a substantial or majority mix of flatted accommodation to do so. It should be aligned with increasing density assumptions for suburban areas (as set out in the HELAA).
- 5.26 It is important that the policy contains some flexibility so as to avoid undue prescription. The reference to “*feasibility*” in considering the ability of qualifying sites to deliver the affordable housing size mix in the policy is helpful, but that term is not explained in greater detail in the policy or its supporting text. It should be, as feasibility does not equate directly to viability but also encompasses elements of site layout, surrounding context, accessibility, etc.

Policy H7 (Development Involving Loss of Dwellings)

- 5.27 Policy H7 seeks to protect existing self-contained dwellings including Houses in Multiple Occupation (**HMO**) that are suitable for occupation by a single household) from loss, except in a limited set of circumstances.
- 5.28 The policy includes criterion (d) to ensure that if there is a net loss of a dwelling, the layout of the unit lost retains the ability to be turned back into a residential dwelling in future.

- 5.29 Overall this policy seeks to protect the existing residential dwelling stock from loss and is supportive of ensuring existing housing supply is maintained in the City.

Policy H8 (Houses in Multiple Occupation)

- 5.30 In Policy H8, permission for conversions to, or the creation of new Houses in Multiple Occupation are limited to specific circumstances and subject to various criteria that restrict the clustering of such uses and ensures compliance with practice guidance on the quality of amenities and facilities for resident occupiers.
- 5.31 The draft policy is not unusual for local authorities where there is strong demand for housing and high unaffordability for purchase or rental as well as competition for housing from students, transient employees and similar households.
- 5.32 HMO's provide an important source of housing supply in Oxford as the Plan identifies at paragraph 2.38, with circa 20% of the total population living in an HMO. When actively licenced and properly managed HMO's offer a valuable source of often higher density housing supply (measured by households accommodated) and are valuable in supporting the provision of accommodation for key employers in the City.
- 5.33 In terms of future housing supply and opportunities to accommodate future households, restrictions set out in the draft policy H8 as to the extent to which new HMO's can be created in particular areas to avoid over-concentrations, may serve to dampen the ability of small and larger (*sui generis*) HMO's to be created to help meet housing needs.

Policy H9 (Location of New Student Accommodation) and Policy H10 (Linking New Academic Facilities with the Adequate Provision of Student Accommodation)

- 5.34 Draft Policy H9 is concerned with directing the location of new student accommodation with a focus on sites that are on or adjacent to existing university or college campus / academic sites or hospital and research sites. The policy also seeks to protect against development that would lead to the

loss of student accommodation unless new, alternative, equivalent, provision is available.

- 5.35 Draft Policy H10 is focused on ensuring that expansion in the numbers of students at higher education institutions does not occur without consideration of how they will be accommodated and is stated to be needed to balance competing demands on land in Oxford.
- 5.36 The policy approach across policies H9 and H10 aims to ensure new student accommodation is built only in suitable locations and is limited to those on courses of a year or more who are receiving the greatest and longest-term educational benefit.
- 5.37 Students population growth forms part of the overall housing need for Oxford and student accommodation is also counted towards the supply of housing in terms of housing capacity. The HELAA uses a conversion ratio to set a student room to dwellings equivalence calculation in accordance with the ratio used in the national Housing Delivery Test.
- 5.38 The effect of draft policies H9 and H10 in directing the acceptable locations for student accommodation and tying growth in accommodation to evidenced expansion in student numbers at higher education institutions is not therefore likely to impinge on overall housing supply capacity, although the growth of student accommodation is focused on one specialist needs group rather than providing housing for the general market.

Policy E1 (Employment Strategy)

- 5.39 Draft Policy E1 establishes the Plan's approach to the protection, growth and alternative future use of identified employment land sites. Paragraphs 3.10 – 3.12 explain that there is a three category definition of employment sites in Oxford: those that support national and regional knowledge economy sectors or are significant employers (Category 1), locally important services sites (Category 2) and smaller, poorly located sites that do not perform an important economic function or are unlikely to be able to in the future (Category 3).

- 5.40 The Local Plan does not propose to allocate new employment sites but supports the intensification and modernisation of existing sites (especially Category 1 and Category 2) to meet employment floorspace needs to 2040.
- 5.41 The draft policy includes a more permissive approach to allow an element of residential development on employment sites where this would not prejudice the employment or operational use of the site.
- 5.42 The focus of this element of the policy is towards granting permission for the loss of Category 3 employment sites (alternative uses for Category 1 and Category 2 sites are much more restricted with requirements to maintain existing numbers of jobs on-site) to other uses and particularly supports residential development of them subject to various acceptability, compatibility and environment and design performance criteria set out in the policy.
- 5.43 While the draft policy appears permissive for the re-development of existing employment sites for residential use, there is little further proactive support in the Plan to deliver on this, as there is no identified list of Category 3 employment sites¹² and no evidence that an employment land release strategy or study has been undertaken to support the release of such land. Put simply, release of employment land for residential is left to the market to deliver.
- 5.44 There is also a question (as evidenced elsewhere in this report) as to the realistic potential for Category 1 and Category 2 sites to be re-used or re-developed even in part, for residential purposes. The draft Policy E1 indicates support for this, but sets restrictive criteria for re-development or change on these sites requiring continued operation (in the case of Category 1 employment sites) and no net loss in existing jobs (for both Category 1 and Category 2 sites).

¹² An Excel-based list of Category 3 sites, by Ward, has been provided to us from OCC in December 2023 (this list does not appear to be set out within the Local Plan or otherwise publicly available) and includes a wide range of sites. It only contained a partial site address. It is evident that some of these sites do not appear to have an existing use that is consistent with the definition of Category 3 employment sites as smaller and more poorly located employment locations.

- 5.45 To be more effective in delivering additional housing capacity and supply, the policy should be supported by more detailed analysis and evidence of the potential scale and nature of Category 3 employment sites and backed by the positive identification of where such sites can be brought forward in order to stimulate change including raising landowner awareness to the potential for residential use in future.

Policy E2 (Warehousing and Storage Uses)

- 5.46 Warehousing and storage uses are dealt with in draft Policy E2. From a housing supply perspective, the policy has some benefits in terms of allowing for the loss of B8 floorspace on any category employment site where it is not essential to support the activities on a Category 1 site. The policy also identifies support for the redevelopment of car showrooms (usually *sui generis*) to housing but caveats this by stating that the site must be suitable for such an alternative residential use.
- 5.47 In effect, the policy would do little to actively promote the re-development of existing B8 warehouse and storage land for residential purposes other than allow for this possibility to occur if brought forward by the market. No new housing supply capacity is attributed to this policy change.

Policy G1 (Protection of Green Infrastructure)

- 5.48 Draft Policy G1 establishes the hierarchy of green and blue infrastructure spaces and affords various levels of protection to each.
- 5.49 Core Green and Blue Spaces (G1A) are protected from any development, loss or harm; Supporting Green and Blue Spaces (G1B) are protected subject to sufficient re-provision and mitigation to the same or better standard; and All other Green and Blue Spaces (G1C) re-development is permitted subject to mitigation and sufficient re-provision or if demonstrated it is surplus to requirements.
- 5.50 The draft policy allows for residential development on existing land subject to design and character criteria; the appropriateness of the plot size and shape,

layout and space to surrounding buildings; and biodiversity and greening requirements.

- 5.51 As drafted the policy identifies a hierarchy of protection for green and blue infrastructure broadly consistent with the NPPF at paragraph 175. There is little difference in restrictions set out in the draft policy with regard to the level of protection and the potential ability to develop Supporting Green and Blue Spaces (G1B) with other Green and Blue Spaces (G1C), with the effect that both of these categories are subject to strong protection from development. The HELAA approach to site suitability reflects the policy protection for existing green infrastructure.
- 5.52 The draft policy's support for the development of existing residential garden land for new dwellings is broadly positive in terms of assisting in providing additional capacity for housing and signals a local plan-led approach that is within the spirit of paragraph 71 of the NPPF as it allows for residential use subject to protection from inappropriate development where harm would be caused to the local area. Such capacity would, in most cases, come forward as small windfall sites rather than plan-led allocations and is factored into the HELAA's windfall contributions now (see Section 2 of this report).

Policy G4 (Delivering Mandatory Net Gains in Biodiversity)

- 5.53 The Environment Act, 2021 requires all new planning applications to deliver biodiversity net gain, with an initial requirement of 10% to be introduced for large sites in January 2024 and small sites in April 2024.
- 5.54 Draft Policy G4 reflects the legal requirement for biodiversity net gain and requires the measurement to be based on the DEFRA Biodiversity Metric.
- 5.55 The draft policy establishes that, in the first instance, the expectation is that biodiversity net gain is delivered either onsite or within those areas of land within the city which have been identified as being most beneficial for supporting the wider ecological network.
- 5.56 From a housing capacity and supply perspective the requirement for 10% minimum biodiversity net gain will be sufficiently challenging to secure on all

qualifying sites. It is therefore understood that in Oxford, delivery of greater than 10% net gain is “*strongly encouraged wherever possible*” but is not stipulated as an explicit requirement of the draft policy.

- 5.57 This is important as the draft policy reflects the legal requirement arising from the Environment Act but does not add a specific further ‘policy layer’ requirement in addition (unlike some other local authorities emerging Local Plans).

Policy G7 (Flood Risk and Flood Risk Assessments – FRAs)

- 5.58 Draft Policy G7 sets out the basis for planning permission to be granted where sites are considered to have the potential for flooding.
- 5.59 The approach in the draft policy is broadly consistent with the NPPF (avoiding development in areas with the greatest probability of flooding subject to sequential and exception needs tests). There are however some unusual circumstances in Oxford in terms of the complexity of the city’s geography and river hydrology that means a more positive approach to development is permissible within Flood Zone 3b for existing brownfield sites than the NPPF would usually provide.
- 5.60 Paragraph 4.50 states that this is in order to make best use of existing sites in the sustainable location of Oxford and because new development has the potential to improve the flood risk situation. The draft policy sets out the conditions to ensure the flood risk situation is improved in Zone 3b including limiting the overall physical built footprint at ground level and ensuring that flood storage capacity is not lost.
- 5.61 Overall, the approach to flood risk and development potential established in the draft policy (and taken as the basis for assessment in the HELAA) reflects a more proactive approach to making best use of previously developed land within areas of higher flood risk.
- 5.62 In this respect it is important to note that the proposed Oxford Flood Alleviation Scheme (see Section 2 of this report), if consented and developed would have the benefit of reducing fluvial flood risk to the west and south of Oxford.

Although this is stated to be aimed at reducing flood risk and increasing resilience for existing properties and infrastructure, there is a further clear benefit of ultimately reducing the risk of flooding in those areas encompassed by the OFAS defence works.

- 5.63 The draft Policy should take the anticipated consent to develop the OFAS into account and should include the opportunity to allow for flood risk assessments for individual sites to appraise the residual and mitigated risks in light of the proposed flood defence works. This would represent a further, positive step by the City Council towards maximising housing supply opportunities in affected flood risk locations.

Policy HD8 (Using Context to Determine Appropriate Density)

- 5.64 Draft Policy HD8 promotes the efficient use of land appropriate for its context and surroundings. This is stated at paragraph 6.33 of the Plan to be because using scarce resources efficiently is vital to ensuring Oxford's sustainable growth and development; and there is capacity to increase density in some parts of the city.
- 5.65 In more detail, the draft policy highlights that sites in the city centre, district centres and at mobility hubs will be capable of accommodating increased scales and densities of development, and that this is also encouraged in all other appropriate locations when impacts are acceptable. High density residential development is stated by the policy to be indicatively 100 dph and is expected in highly accessible locations of the city and district centres within the context of the heritage of those locations.
- 5.66 Although not stated in the policy, the supporting text at paragraph 6.33 also identifies that there is capacity to increase density in other more suburban areas and along main arterial roads.
- 5.67 The indicative residential density of 100 dph for city and district centres is not explained in the policy or elsewhere in the supporting justification text. Although 100 dph is a relatively medium / high density, and would usually be reflective of flatted apartment housing there is clearly scope for much more significant densities of residential development where flatted accommodation

could be created at densities well above 100 dph. Achieved densities in excess of 200 dph are not unusual in many urban centres and sustainable, well-connected locations now, especially where these are also supported by reduced private vehicle parking requirements (as the Local Plan: 2040 proposes in Policy C8) and there is a positive and innovative approach to the provision of green amenity space and access to local facilities.

- 5.68 The basis for indicating 100 dph in the draft policy should be fully evidenced and the Council could seek to increase this to maximise housing capacity from city, district centre and high accessibility locations.

Policy HD9 (Views and Building Heights)

- 5.69 Draft Policy HD9 serves to protect the special significance of the historic Oxford skyline from within and outside the city. Development above prevailing heights and which could impact on the character of the area are expected to be fully justified.
- 5.70 The draft policy defines a 1,200m radius of Carfax Town as the Historic Core Area within which all the buildings that the comprise the historic skyline are situated. Development above 18.2m (60 ft) height or ordnance datum (height above sea level) of 79.3m (260 ft) is to be limited in bulk and subject to the highest design quality. Extensive evidence is required under the policy therefore for buildings of +15m height in areas the High Buildings Technical Advice Note identifies.
- 5.71 View Cones are defined in the Policies Map to understand and protect the skyline views to and from the city. Development in a View Cone or the setting of a View Cone is restricted if it would harm the special significance of the view.
- 5.72 The effect of the policy (which is long standing) is to restrict the bulk and height of new development in many locations across the city and particularly within the defined View Cones and the Historic Core Area.
- 5.73 The impact from a housing supply and capacity perspective is that height and bulk limitations in these sensitive areas restrict the density of residential development that can realistically be achieved and in some instances could

serve to push against the opportunities to increase residential development density proposed in draft Policy HD8 (see above).

Policy C2 (Maintaining Vibrant Centres)

- 5.74 The densification and growth of the defined district centres and the city centre is supported through draft Policy C2. It states that high density development is generally expected in the city and district centres and references back to Policy HD8.
- 5.75 The draft policy specifically supports housing capacity through intensification of development to create a high density centre and more efficient use of land; provide for more residential development including through the use of upper floors of existing commercial properties; and rationalise the availability of public car parking.
- 5.76 The implementation of this policy is generally positive as it affirms the development of greater density and intensity of use including for residential dwellings in the city and district centres, but when read together with the policies related to protecting heritage this could, without proactive intervention and positive planning, lead to 'under-playing' the city and district centres growth potential.
- 5.77 In plain terms, the city and district centres need to be subject to specific studies and strategies / action plans that actively identify and support regeneration and re-use of sites and establish more specific programmes for growth including for residential development.
- 5.78 The policy as drafted provides a broadly positive basis but there is need for more proactive intervention to bring sites and properties forward as the policy envisages.

Policy C8 (Motor Vehicle Parking Design Standards)

- 5.79 Paragraph 7.47 of the Plan advises that the objective of parking design policies and standards is, alongside the range of measures to reduce the need to travel

and to encourage active travel modes, seeking to reduce the opportunities for parking across the city.

- 5.80 Paragraph 7.50 describes that the level of car ownership is expected to decline in future with the emergence of car clubs and new technologies as well as improved public transport, walking and cycling.
- 5.81 Paragraph 7.51 points towards opportunities to deliver successful low car housing development in Oxford because of the coverage of Controlled Parking Zones (**CPZ**) and the availability of good quality walking and cycling routes and facilities and reliable public transport.
- 5.82 For new residential schemes of 100+ dwellings the Plan indicates that it may not be appropriate to provide one parking space for each dwelling unit.
- 5.83 According to paragraph 7.55, HMO developments would be excluded from obtaining CPZ permits and therefore limit the need for additional parking provision for the HMO which could otherwise be higher than for a single household occupied property.
- 5.84 With respect to public parking the Plan recognises the need for some on and off-street parking to meet requirement of those using city and district / local centres for business and leisure. The Plan does not support growth in either on-street or off-street public parking provision.
- 5.85 Although it is not stated in the Plan, the restrictions on public parking provision, together with other private vehicle access restrictions, could provide the opportunity to re-assess the need for and scale of public parking available with the possibility of re-development of public car parking facilities for other uses (or combined with other uses), including residential development above car parking facilities. This would help make more efficient use of land in the city and be another contributor to housing land supply.
- 5.86 Draft Policy C8 therefore provides the basis for a strong positive approach to re-organisation of provision for private vehicles in Oxford with a clear direction towards restriction of parking provision over the plan period. A key benefit of this would be a reduction in the amount of land and space needed to

accommodate private vehicles overall and the potential to release such land for residential or other development.

Summary Conclusions

Drawing the consideration of policies relevant to the supply of housing in the draft Local Plan: 2040 together our summary conclusions are:

- a) there are a number of draft Local Plan policies that are relevant to the supply of housing in Oxford. The Plan's draft Policy S1 (Spatial Strategy and Presumption in Favour of Sustainable Development) explains that sustainable growth in the delivery of homes, jobs and services is an aim of the Plan. It indicates that housing delivery is a priority;
- b) other policies of the draft Local Plan appear however to reduce the commitment to delivery of housing as a priority or are likely to prove more restrictive in practice when read the Plan is read as a whole. For example, draft Policy H1 provides for "*an element of housing on all employment sites if suitable*". The wording used "*an element*" does not give particularly strong direction or confidence that employment sites could be redeveloped in whole for housing. This is carried across into draft Policy E1 which includes criteria that would significantly restrict the ability to bring residential forward on employment such sites with requirements for maintaining existing numbers of jobs on-site and where residential would not prejudice the employment or operational use of a site. Furthermore, the focus on release of Category 3 employment sites for residential use is not backed up by a clear strategy, programme or even clear identification of where such lower grade employment land is to be found in Oxford;
- c) Policy E2 (Warehousing and Storage Uses) allows, from a housing supply perspective, the possibility of the loss of B8 storage or warehousing floorspace on any category employment site but would in

practice do little to implement such changes of use other than where the market might bring such sites forward. It is not a proactive approach or policy and would realistically have at best a neutral effect on delivering additional housing supply;

- d) policies relating to affordable housing including H2 (Delivering Affordable Homes) and H5 (Employer-Linked Affordable Housing) would have a limited effect on prioritising housing delivery with substantial requirements for affordable contributions on-site (subject to viability testing); and employment-linked housing being delivered on very specific sites and in particular circumstances.
- e) restrictions on new HMO's under draft Policy H8 (Houses in Multiple Occupation) could serve to dampen the ability of small and larger HMO's to be created to help meet housing needs;
- f) housing mix policy H6 (Mix of Dwelling Sizes) has an emphasis on supporting increased housing capacity and density as it tends to promote smaller size affordable dwellings (it is silent on the market housing size mix) on sites that are located outside the city and district centres. However the policy's focus on smaller size units outside the city and district centres may run counter to draft Policy HD8 (Using Context to Determine Appropriate Density) that promotes greater densities of residential development in city and district centre locations and for mobility hubs and generally seeks lower densities (based on the HELAA's site density assumptions) for sub-urban and Conservation Area locations (see the HELAA at Section 2.2).

In this respect it is also important to cross-reference draft Policy HD9 (Views and Building Heights) that restricts the bulk and height of new development in many locations across the city and particularly within the defined View Cones and the Historic Core Area (those designations cover a significant amount of the City Centre and also the District Centres) and in relation to draft Policy C2 (Maintaining Vibrant Centres) where higher residential densities are considered acceptable. The impact of the view and building height protections could serve to

militate against opportunities to realistically increase residential development density especially where increased height / bulk would be required to deliver greater dwelling numbers;

- g) the approach to flood risk and development potential established in draft Policy G7 (Flood Risk and Flood Risk Assessments) reflects a more proactive approach to making best use of previously developed land within areas of higher flood risk and shows the benefits of close working between the City Council and the Environment Agency on this matter;
- h) the Plan's policies and approach in relation to flood risk reduction and assessment could go further to be consistent with the aims of prioritising housing development in the context of the future implementation of the Oxford Flood Alleviation Scheme, which could include the opportunity to allow for flood risk assessments to appraise the residual and mitigated risks in light of the proposed flood defence works; i.e. helping reduce flood risk levels in affected locations of the city with potential to derive further housing development potential as a result (albeit not the basis for the OFAS investment, but clearly a result of the scheme if implemented); and
- i) one of the most significant and potentially influential policies to support prioritisation of housing is set out in draft Policy C8 (Motor Vehicle Parking Design Standards) and especially the policy's objective to reduce opportunities for vehicle parking across the city. This policy approach provides a clear platform to re-assess the need for and scale of public parking and open the potential for re-development of existing public car parking facilities for residential and other uses. Neither the Local Plan's proposed site allocations nor the approach sites in the HELAA explore this opportunity further however.

Our overall conclusion is that the Local Plan's overarching stated objective to prioritise housing is not consistently supported by the various policies relevant to housing supply which tend, when considered together, to introduce significant elements of restriction either in terms of locations where

higher density housing delivery may be realistic, or are not especially proactive or flexible in the criteria they establish that would allow release of land for housing to come forward. Taken together the draft policies with the approach in the HELAA has served to under-explore or promote potential housing delivery opportunities.

6. Conclusions and Recommendations

Introduction

- 6.1 In this section we draw the report's main findings together and offer conclusions as to the possible opportunities that Oxford City Council could explore to increase the supply of new dwellings within the area. We also offer a number of thoughts for action.

Housing Needs and Supply Context

- 6.2 To establish the overall context for reviewing Oxford's housing capacity we briefly considered the housing needs and proposed supply position in Section 1, with the following main findings:
- a) The new Oxford Local Plan: 2040 has an updated vision, objectives, policies and proposed development site allocations for the period 2020 – 2040;
 - b) the emerging Plan has a stated aim in Policy S1 to prioritise the capacity for new housing development in Oxford;
 - c) OCC has prepared a Housing and Economic Needs Assessment and a Housing and Economic Land Availability Assessment together with an interim Employment Land Needs Assessment to support the new Local Plan. These studies together offer the most recent evidence of future housing needs and the potential supply of land to accommodate housing and employment land requirements arising;
 - d) draft Local Plan Policy H1 (Housing Requirement) identifies a total housing need (from the HENA) of **1,322** dwellings per annum (**26,440** dwellings in total over the period 2020 – 2040); and
 - e) draft Policy H1 confirms the total planned provision of housing land (comprising both site allocations, completions from 2020/21 – 2022/23

and a windfall site development allowance) for a total of **9,612** dwellings (**481** dpa) over the period 2020 – 2040 within Oxford. The total supply proposed in the City is some 36% of the total identified need.

The Oxford HELAA

6.3 In Section 2 we investigated the approach, method and assumptions underpinning the Oxford Housing and Economic Land Availability Assessment (September 2023) which forms the principal evidence basis for analysis of the potential of land for future housing or economic development.

HELAA Approach, Method and Assumptions

6.4 The HELAA approach, method and assumptions used will have an effect on the outputs and outcomes of the work. There is a need to ensure that the assumptions used are evidenced and realistic in order for the Local Plan: 2040's approach to be considered sound and effective.

6.5 Our conclusion is that the HELAA work is not entirely consistent with the NPPF or with the guidance set out in the PPG. Our consideration of these matters found as follows:

- a) the HELAA 2023 assessed **479** sites in total;
- b) the HELAA includes sites with potential for housing over **0.25 Ha** or capable of delivering **10+** dwellings; it includes economic uses of **500+** sq.m;
- c) the site size threshold used (10+ dwellings or 0.25 Ha) broadly accords with national policy and practice although the NPPG considers that it may be appropriate to consider all sites / locations capable of delivering five or more dwellings. It is questioned whether, in Oxford's circumstances a smaller site size threshold (5+ net dwellings) would be a more appropriate starting point for identification and appraisal of potential housing sites;
- d) total housing supply arising is stated to be **9,612** net additional dwellings (including 10% non-implementation buffer applied to the HELAA sites that removes some **652** dwellings identified as suitable, available and

achievable). This is comprised of **1,846** dwellings completed 2020/21 – 2022/23; **5870** dwellings from HELAA sites identified as suitable, available and achievable (10+ net dwellings in size); and **272** dwellings from small sites (<10 dwellings with planning permission); and **1,624** dwellings from windfall sites (116 dpa);

e) the approach to inclusion / exclusion or assessment of housing development on various types of land and sites highlights:

- **flood risk zones** – the HELAA includes sites in Flood Zones 1 and 2 and states that there is a bespoke approach following agreement with the Environment Agency with respect to potential sites in Flood Zone 3. Existing developed sites within Flood Zone 3b can be considered for “*very careful re-development*” and are not excluded from the HELAA.

The benefit in reducing fluvial flood risk that the implementation of the Oxford Flood Alleviation Scheme works would provide (if implemented) during the Local Plan: 2040 period raises the potential for a more positive approach to unlocking future development land from Flood Zone 3 areas where the flood risk modelling including taking account of the effects the OFAS defence works would have in reducing the flood risk in those areas;

- **Employment sites** - the draft Local Plan: 2040 introduces a more permissive approach (through Policy E1) to allow an element of residential development on employment sites where this would not prejudice the employment or operational use of the site. The HELAA states that all employment sites with the potential to deliver housing have been included in the assessment but there is no publicly available evidence that the Category 3 sites have been assessed (the Interim ELNA assesses Category 1 and Category 2 employment land). There is also no clear evidence as to the realistic capacity for residential development within the Category 1 and Category 2 employment sites assessed and in many cases such sites are rejected for residential development through the

HELAA analysis on the basis of landowner intentions and therefore lack of availability.

There is no clear evidence that a systematic analysis of the constraints (and mechanisms to overcome these) have been considered for employment sites that are then rejected from the HELAA;

- **Open Air Outdoor Sports Facilities** - The HELAA relies upon the draft Oxford Playing Pitch and Outdoor Strategy 2022 – 2036 which assesses the existing and future need for playing pitch provision, concluding that there is a need to protect outdoor sports facilities but also to enhance provision through greater community access and intensification of use of existing sports and recreation space. The Strategy has not been published with the evidence base for the Local Plan and appears to remain in draft form. It also covers the period 2022 to 2036 rather than the Local Plan period 2020 – 2040.

The HELAA assessments of sports pitches shows that where they have been assessed they are almost always rejected on the basis of suitability or availability, despite clear opportunities to allow for re-location elsewhere, re-development or partial development through more effective and intensive use of the extensive existing outdoor space provision.

The lack of analysis of current and future needs for golf course facilities is an important gap given the extent of existing golf course land use within the urban area of the city;

- **Allotments** - Oxford Local Plan policies provide for the protection of existing allotments and restricts their loss although it allows for re-provision.

The HELAA states that the majority of allotment sites have waiting lists which illustrates the high demand that exists (although it is not clear where the evidence for this is to be found). Allotments are

included within the HELAA sites for assessment but are almost entirely rejected on grounds of suitability and availability.

There is no evidence in the HELAA, or elsewhere in preparation of the Local Plan that the potential for re-provision of land swaps with other sites been tested or evaluated.

Given the extensive level of allotment land coverage within Oxford, there is a question as to whether the HELAA and the Local Plan have sought to unlock allotment land for residential development through mechanisms to overcome the constraint as the PPG methodology for HELAA's expects.

Estimating Development Potential and Densities

- f) estimating development potential through the HELAA is on the basis of density typologies in cases where there is no planning permission of pre-existing site allocation for sites. The HELAA explains that site specific urban design assessments have been undertaken but these are not publicly available. The density bands represent a significant range from 35 – 120 dph but the density assumptions are generally quite low and especially for Gateway sites given the prominent character and intensity of land use at such pivotal locations. The lower density range for Conservation Areas is also questioned especially where higher density residential development forms part of the heritage characteristics that some such areas seek to protect and, in some cases, coincides with city and district centres that the Local Plan identifies as locations for higher density development;
- g) for student accommodation, the HELAA proposes an approach that accords with accommodation dwelling equivalents set out in the national Housing Delivery Test;

Overcoming Constraints

- h) the HELAA's method and approach does not show evidence as to where there has been consideration of what actions could be taken to overcome constraints to suitability, availability or achievability (as the NPPG

expects) and therefore allow the site in question to form part of the potential housing land supply;

Non-Implementation Rates

- i) the HELAA applies a 10% Non-Implementation discount to the total capacity of all sites that are concluded to be suitable, available and achievable. This reduces the HELAA capacity from such sites by **652** dwellings and results in a total stated capacity from such HELAA sites of 5,870 dwellings;
- j) the NPPF does not require a discount or buffer to be applied in the assessment of housing capacity other than in establishing the five-year housing land supply position. Critically, the NPPF expects that the buffer is drawn from sites and capacity moved forward from later in the plan period rather than an overall discount to housing land capacity;
- k) the PPG supports the preparation of an indicative housing trajectory with an overall risk assessment as to whether sites will come forward as anticipated. It does not however necessitate a non-implementation buffer, but rather expects that the HELAA's assessments of suitability, availability and achievability, taken together, provide the risk assessment considering the potential likelihood of delivery occurring on-site. The conclusion being that sites meeting these tests are anticipated to be deliverable for the level of housing tested.
- l) it is also of concern that the 10% Non-Implementation discount is unsubstantiated in its own right. It is purported to reflect the situation in Oxford but there is no indication as to the evidence of historic non-implementation rates for housing schemes to underpin the discount proposed. This should be evidenced to allow closer understanding;
- m) overall the result of applying a discount is to require additional sites and land to be identified to help meet the housing need and the need to take a more positive approach to identifying potential housing sites in order to build greater resilience and flexibility into the Plan's housing land supply;

Timescales for Housing Development

- n) the approach to delivery timescales appears consistent with the NPPF's requirements but there is relatively little weight of evidence and information presented in the HELAA (or the Local Plan: 2040) as to the housing delivery trajectory that results from the assignment of sites to different delivery periods;
- o) it is left to the reader to calculate the level of housing delivery anticipated in each five-year period and evidently the overall total does not come anywhere near meeting the identified housing need. There is a lack of analysis of the effects of this in the HELAA or the Plan itself in terms of the implications for delivery rates and completions anticipated over time;

Approach to Windfall Housing Supply

- p) the HELAA provides an assessment of the potential contribution of windfall housing sites. The windfall definition in Oxford is not entirely consistent with the NPPG (which indicates windfalls as being sites capable of fewer than five dwellings in size);
- q) the HELAA identifies that most of the windfall sites come from: sub-division of existing housing, flats over shops, intensification of sites, redevelopment of existing housing, development of derelict land / buildings on brownfield land and conversion of commercial land to housing. Housing from development of garden land is also included now;
- r) there is evidence of significant delivery of new dwellings arising from small windfall sites and the HELAA (and the Local Plan) are therefore right to include windfall development as an important source of future housing supply;
- s) the calculation of windfall housing delivery rates in Oxford has been subject to considerable variability and sensitivity over time arising from changes in the local Oxford definition of windfall site sizes / minimum housing output and also the effects of the pandemic and economic / development market uncertainty leading to dampened development rates and fluctuations in the most recent years;

- t) overall, the windfall rate identified in the HELAA and used in the Local Plan: 2040 at **116 dpa** appears low in comparison with the figure used in the latest AMR (**136 dpa**) and previous HELAA 2022 evidence (**127 dpa**) and fails to reflect an uplift that should be applied in the context of the HELAA's recent change in methodology from 5+ to 10+ dwellings as the windfall site size.

Potential Additional Sources of Housing Land Supply

- 6.6 In Section 3 we evaluated the situation and potential arising from sources of potential housing supply that might yield additional new dwellings.
- 6.7 A wide range of different locations and types of land were considered including sites rejected from Oxford's HELAA as well as sites that were not included in the HELAA process.
- 6.8 The most important findings from this analysis are as follows.

Sites Not Tested for Residential Use

- a) despite an encouraging Local Plan policy position, 27 sites were not tested for residential use through the HELAA at all, despite being identified in the sources of supply. This is a missed opportunity that Oxford City Council should address;

Sites Rejected due to Availability and Landowner Intentions

- b) the extent of sites being 'Rejected' by the HELAA due to their availability is stark. 156 sites identified as suitable are reduced to only 98 sites when availability is also factored in; a reduction of 58 sites. Put simply, lack of availability on 58 otherwise suitable sites led to their ultimate rejection by the HELAA. To illustrate this, if the sites concluded to be not available were developed at a modest suburban density, they could accommodate just over 3,000 dwellings;
- c) landowner intentions are reported in a rudimentary or cursory fashion within the HELAA and there is little available evidence to indicate just how strenuous or extensive the efforts have been in all cases to obtain

landowner indications of availability or to address these matters in the context of a Local Plan period that extends for 20 years to 2040;

- d) the importance of availability of sites and accurate landowner intentions is critical in securing housing land supply in the context of Oxford's constraints. The clear result here is that landowner intentions significantly reduce the potential for housing supply through the HELAA;

Taking a Proactive Approach

- e) it is apparent that despite some of the 'Rejected' sites being a focus in previous plan-making, there is little evidence of a proactive approach since then to assist in identifying the actions that could be taken to overcome constraints and bring sites forward (which the PPG expects at paragraph ID 03-21);
- f) this is concerning both in terms of ensuring the HELAA's work is consistent with the NPPG particularly regarding maximising housing delivery in the context of the purported significant future housing needs of Oxford;

Potential Additional Housing Capacity from Unassessed, Rejected or Unallocated Sites

- g) the table below provides a summary of the potential additional housing capacity that might be possible arising from unassessed, rejected or unallocated sites:

Potential Additional Housing Capacity (Dwellings) from Unassessed and Rejected Sites		
	Low Density Range	High Density Range
Rejected Sites capacity	2,967	3,593
Unassessed Sites capacity	319	382
Total Dwellings	3,286	3,975

- h) it is noted and acknowledged that more than half the additional housing capacity from the first two categories are linked to the substantial Southfield Golf Course (Site 292);
- i) we set out our estimated capacity from ‘Accepted’ but unallocated sites separately in the table below as, while the Local Plan will have estimated some capacity from the seven sites we highlight, we cannot make a direct comparison to that figure.

Potential Additional Housing Capacity (Dwellings) from Sites Identified as ‘Accepted’ but Unallocated in the Plan		
	Low Density Range	High Density Range
Unallocated (but ‘Accepted’ Sites capacity	194	233
Total Dwellings	194	233

Proposed Housing Site Allocations

- 6.9 In Section 4 we examined the proposed housing supply contribution arising from sites selected for allocation for residential or employment development in the Local Plan 2040. Our key findings are:

Site Selection Process

- a) the evidence base contained in Background Paper 15a Site Assessment Process (Urban Design and Assessment of Housing Capacity) and 15b Site Assessment Process (Site selection and allocation) outlines the approach which has identified the site allocations and the methodology and assumptions which have been applied in the context of housing capacity/density and design housing capacity;
- b) a three stage process to site selection has been adopted and comprising assessment against national policy and environmental/physical

constraints; the Sustainability Appraisal objectives, and deliverability drawing on landowner engagement. This process appears to have been thorough and comprehensive;

- c) the process is supported by bespoke urban design assessments that have been undertaken to inform the 'minimum' housing capacity of sites. It is noted that assessments have not been undertaken for all sites which raises the question why capacity has not been assessed for all sites where residential is supported;
- d) it is concerning that the design capacity assessments have not been published despite forming a crucial element of the site assessment process;

The Proposed Site Allocations

- e) there are 50 site allocations identified in the Local Plan 2040 with the majority of the allocations rolled forward from existing Local Plan 2036 and most relating to residential, or mixed uses including residential (and / or student accommodation, and / or employer linked affordable housing);
- f) the total site area of the allocations extends to 408 Ha although in reality a part of this overall area is associated with a small number of sites, especially the Category 1 employment and hospital / health related sites, which identify scope for an element of residential uses as site allocations;
- g) the site allocations are identified to contribute a 'minimum' housing capacity for the Local Plan in the range 4,077 to 4,297;
- h) overall our review of the site allocations concludes that the majority are considered to represent appropriate opportunities for residential, whether in full or as part of mixed uses, with reasonable estimates of 'minimum' housing capacities, that in many cases are consistent with existing planning permissions and the HELAA evidence base. We have however identified a number of inconsistencies and areas of concern related to opportunities for additional housing supply;

Opportunities for Additional Housing Supply on Proposed Allocation Sites

- i) there are a number of proposed allocation sites where it is considered a higher level of housing capacity could be secured if a more proactive approach to 'minimum' housing capacity and higher densities were adopted. The identified sites relate to the following:
 - o Kassam Stadium/ Ozone Leisure Park;
 - o Overflow Car Park Kassam Stadium, and
 - o Jesus and Lincoln College Sports Ground;
- j) it is estimated these three sites could possibly support an additional minimum housing capacity in the range 122 – 238 dwellings above their planned supply, depending on the density assumptions adopted;

Proposed Allocation Sites Where Residential is Supported but No Housing Supply Identified

- k) some of the proposed site allocations (12 in total) are not supported by an identified minimum housing capacity despite residential use (including student accommodation and employer linked housing) being identified as an acceptable land use and the HELAA identifying housing capacity for these sites totalling some 766 dwellings. As a consequence, a comprehensive estimation of housing capacity is not currently provided by the Local Plan 2040 site allocations. This under plays the potential level of housing supply by a minimum of 766 dwellings;

Conclusions on Overall Possible Additional Housing Supply Capacity

- l) the table below summarises the possible additional housing capacity and supply that might be supported and arising from various sources including:
 - o by accepting sites that were rejected in the HELAA or were accepted but not then taken forward to allocation;
 - o assessing sites that were not included for analysis in the HELAA;

- o estimating a possible residential development capacity from Category 3 Employment Sites;
- o taking a different approach to development density assumptions for some proposed allocation sites;
- o counting the indicative potential housing capacity of proposed allocation sites where the Local Plan supports residential but does not give a specific figure (drawing from data in the HELAA);
- o re-instating the 652 dwellings removed by the HELAA (the 10% non-implementation buffer applied to the HELAA sites identified as suitable, available and achievable).

Source	Dwellings (Lower Density Range)	Dwellings (Higher Density Range)
Rejected Sites Potential Capacity	2,967	3,593
Unassessed Sites Potential Capacity	319	382
Unallocated (but 'Accepted') Sites Capacity	194	233
Sub-Total (A)	3,480	4,208
	Low Levels of Release (20% of Sites)	Higher Levels of Release (80% of Sites)
Availability / Rejected Sites	600	2,400
Category 3 Employment Sites	187	750
Sub-Total (B)	787	3,150
Proposed Allocation Sites Additional Capacity	122	238
Identification of a Minimum Housing Capacity at all Sites Where Residential Use is Supported (data from HELAA)	766	766
Sub Total (C)	888	1,004
Re-Instatement of Dwellings Removed due to 10% Non-Implementation Buffer in HELAA	652	652
Sub Total (D)	652	652
Overall Total (A+B+C+D)	5,807	9,014

Source: CCL and UDL calculation, Oxford HELAA 2023 and draft Local Plan 2040

The Local Plan's Support for Housing Supply

6.10 In Section 5 we considered the extent to which the draft policies of the Local Plan: 2040 were sufficiently positive, proactive and flexible to ensure that housing delivery and site capacities could be maximised in the context of securing sustainable development during the plan period to 2040 and with respect to the significant level of identified housing need. The main findings were:

- a) the Plan's draft Policy S1 explains that sustainable growth in the delivery of homes, jobs and services is an aim of the Plan. This is supported at various points in the Plan's text and with regard to other policies such as H1 (Housing Requirement). Policy S1 identifies a priority for housing delivery;
- b) other policies of the draft Local Plan appear to reduce the commitment to delivery of housing as a priority or are likely to prove more restrictive in practice when the Plan is read as a whole, for example:
 - draft Policy H1 provides for "*an element of housing on all employment sites if suitable*". The wording used "*an element*" does not give particularly strong direction or confidence that employment sites could be redeveloped in whole for housing.
 - this is carried across into draft Policy E1 which includes criteria that would significantly restrict the ability to bring residential forward on employment such sites with requirements for maintaining existing numbers of jobs on-site and where residential would not prejudice the employment or operational use of a site.
- c) the focus of release of Category 3 employment sites for residential use is not backed up by a clear strategy, programme or even clear identification of where such lower grade employment land is to be found in Oxford;
- d) Policy E2 (Warehousing and Storage Uses) allows the possibility of the loss of B8 storage or warehousing floorspace on any category employment site but would, in practice, do little to implement change of use to housing other than where the market might bring such sites

forward. It is not a proactive approach or policy and would realistically have at best a neutral effect on delivering additional housing supply;

- e) policies relating to affordable housing including H2 (Delivering Affordable Homes) and H5 (Employer-Linked Affordable Housing) would have a limited effect on prioritising housing delivery with substantial requirements for affordable contributions on-site (subject to viability testing); and employment-linked housing being delivered on very specific sites and in particular circumstances;
- f) restrictions on new HMO's under draft Policy H8 (Houses in Multiple Occupation) could serve to dampen the ability of small and larger HMO's to be created to help meet housing needs;
- g) Policy H6 (Mix of Dwelling Sizes) has an emphasis towards supporting increased housing capacity and density as it tends to promote smaller size affordable dwellings (the draft policy is silent on the market housing size mix) on sites that are located outside the city and district centres. However the policy's focus on smaller size units outside the city and district centres may run counter to draft Policy HD8 (Using Context to Determine Appropriate Density) that promotes greater densities of residential development in city and district centre locations and for high accessibility hubs and generally seeks lower densities (if considered with the HELAA's site density assumptions) for sub-urban and Conservation Area locations (see the HELAA at Section 2.2).

In this respect it is also important to cross-reference draft Policy HD9 (Views and Building Heights) that restricts the bulk and height of new development in many locations across the city and particularly within the defined View Cones and the Historic Core Area (noting that those designations cover a significant amount of the City Centre and also the District Centres) and in relation to draft Policy C2 (Maintaining Vibrant Centres) where higher residential densities are considered acceptable. The impact of the view and building height protections could serve to militate against opportunities to realistically increase residential development density especially where increased height / bulk would be required to deliver greater dwelling numbers;

- h) the approach to flood risk and development potential established in draft Policy G7 (Flood Risk and Flood Risk Assessments) does reflect a more proactive approach to making best use of previously developed land within areas of higher flood risk and shows the benefits of close working between the City Council and the Environment Agency on this matter;
- i) the Plan's policies and approach in relation to flood risk reduction and assessment could however go further to be consistent with the aims of prioritising housing development in the context of the future implementation of the Oxford Flood Alleviation Scheme which could include the opportunity to allow for flood risk assessments to appraise the residual and mitigated risks in light of the proposed flood defence works; i.e. helping reduce flood risk levels in affected locations of the city with potential to derive further housing development potential as a result (albeit not the basis for the OFAS investment, but clearly a result of the scheme if implemented); and
- j) one of the most significant and potentially influential policies to support prioritisation of housing is set out in draft Policy C8 (Motor Vehicle Parking Design Standards) and especially the policy's objective to reduce opportunities for vehicle parking across the city. This policy approach provides a clear platform to re-assess the need for and scale of public parking and open the potential for re-development of existing public car parking facilities for residential and other uses in the plan period. Neither the Local Plan's proposed site allocations nor the approach to sites in the HELAA explore this opportunity further however.

6.11 Overall, our conclusion is that the Local Plan's overarching stated objective to prioritise housing is not consistently supported by the various policies relevant to housing supply which tend, when considered together, to introduce significant elements of restriction either in terms of locations where higher density housing delivery may be realistic, or are not especially proactive or flexible in the criteria they establish that would allow release (or an element) of housing to come forward.

- 6.12 Taken together the draft policies with the approach in the HELAA has served to under-explore or promote potential housing delivery opportunities.

Recommendations for Next Steps

- 6.13 Drawing the analysis, conclusions and implications together, the following recommendations are made with respect to the next steps and actions that could, in our opinion, assist in improving the capacity and level of new residential development supply, including as part of mixed use development derived from sites in Oxford and help to reduce the overall, evident, shortfall in future housing provision in the city.

R1: Set an Overall Approach to Unlocking Sites for Additional Housing Capacity

- 6.14 Regeneration, development and change of use of sites in Oxford will require a sustained and more intervention-led approach given the complex underlying physical and ownership characteristics. These include actions, interventions and approaches that:
- help establishing a specific long-term vision and objectives for the use of types of land including low grade employment sites (Category 3) and existing housing estates capable of regeneration and intensification;
 - build a positive perception and greater confidence to invest time and resources into site development to help address deep-seated development landowner and occupier inertia;
 - create clusters and packages of sites that link them to anchors of activity (the city and district centres and high accessibility corridors / gateways for example) and can be used to identify and direct the prioritisation of site re-development for housing and mixed uses (i.e. effectively focusing on those sites and clusters of sites that offer the greatest potential opportunity for greater density of housing); and
 - continue to evolve and expand public-public and public-private partnering as a key mechanism to share development and finance risk; bring forward

packages of sites; better co-ordinate planning and corporate policies / objectives; and help focus work on identifying priority sites and clusters.

R.2: Expand Housing Capacity Assessments for the City Centre and District Centres

- 6.15 There is an important role and need to provide a clear and comprehensive analysis of the potential capacity for new housing, including as part of employment and mixed-use development, for the City Centre and also the District Centres.
- 6.16 These are the focus, in policy terms, of areas where higher density residential development is appropriate, but there is little current work available or specific strategies to help unlock this potential, especially in the context of plan policies seeking to reduce vehicular parking and ensure sensitive design in areas of significant heritage assets.
- 6.17 The recommendation is made on the basis of the importance and weight attributed in the policies of the Local Plan to the role of the City Centre and the District Centres as sustainable locations for housing growth.
- 6.18 The analysis and illustrations of the possible additional capacity that we have outlined in this report (noted to be based on a snapshot overview and using readily available information only) has identified the important potential for the centres. It is plain that there is more residential development that could be achieved in these locations with due consideration of the structural economic changes and land use / floorspace use changes ongoing in many town centres including replacement of retail space with residential and mixed leisure / commercial activities.
- 6.19 We therefore recommend that additional work and support is provided now to allow more detailed and extensive assessments of the potential housing capacity in the centres to expand the information and evidence base for the Plan. This work would need to draw fresh analysis of sites for development, conversion or intensification opportunities.

R.3: Review Approach to Delivery of Housing for Employment Sites and Estate Regeneration Opportunities

- 6.20 Our review suggests that with a more proactive frame of reference and approach to future delivery the residential development potential of lower grade employment sites (principally Category 3 but also some Category 2 sites) and with regard to older and poor quality housing estates could yield potential for additional new housing to be brought forward, including as part of mixed-use regeneration.
- 6.21 We understand and acknowledge the key barriers to unlocking often challenging sites in terms of landowner / occupier intentions and community expectations but with high housing needs pressures and capacity constraints evident in Oxford these areas of land and sites need to work harder in future. A proactive, systematic strategy for re-organisation and re-use is needed rather than relying mainly on the market to deliver.
- 6.22 Put simply, there is a greater prospect of achieving changes of use for under-used employment land where there has been a systematic analysis of the priority locations, the key opportunity sites and areas and then a focused delivery approach to unlocking the barriers arising, including deployment of public funding, estate regeneration programmes and use of land assembly powers including compulsory purchase.
- 6.23 We are therefore recommending that work to further assess, evaluate and prioritise both existing lower quality housing estates and existing lower grade employment sites to develop a more detailed and refined view of the best opportunities for delivery (either individual sites or clusters / packages of sites) over the Local Plan period to 2040.
- 6.24 This should sit alongside a recognition of the role that the release of Category 3 employment land (as Policy E1 allows) will play an important contributing role in overall housing supply. The Plan should include further specific mechanisms to prioritise and achieve release over the plan period.

R4: Take a Proactive Public Role

- 6.25 The NPPF identifies the national objective of supporting the effective use of land in meeting the need for homes and other uses (paragraph 119).

6.26 This includes land where vacant sites and buildings could be re-used or redeveloped including through the use of Brownfield Land Registers (paragraph 38), making effective use of previously developed land (paragraph 119); supporting opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land for homes and other identified needs (paragraph 120 c); and promoting the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (paragraph 120 d).

6.27 In paragraph 121, the NPPF is especially clear that a proactive approach to bringing forward land for development needs is required:

*“Local planning authorities, and other plan-making bodies, should take a **proactive role** in identifying and helping to bring forward land that may be suitable for meeting development needs, **including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.** This should include **identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers**, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes”. (Our emphasis).*

6.28 Taking a positive approach is also envisaged at paragraph 123, including a) using retail and employment land for homes in areas of high housing demand subject to not undermining key economic sectors and being compatible with the other policies of the NPPF.

6.29 In this respect it is clear that there is a need to work proactively and positively on the re-use and development of sites for regeneration and re-development in Oxford including focusing on the proactive removal of barriers / constraints to development.

R5: Deal with Land Ownership and Intentions Barriers

6.30 Land ownership barriers evident in Oxford have two distinct components.

Fragmentation of Ownership

- 6.31 Firstly there is the fragmentation of freehold, leasehold and rental licence agreements in place both within individual sites and land which makes the identification of underlying owners hard to track down and then to obtain agreement in principle from all relevant parties for any change of use to residential (or other re-development of the site or building).
- 6.32 This is not at all unusual as there is a long history of ownership and use for many sites, including the sub-division of ownership and occupation interests over time.

Owner / Long Term Occupier Intentions

- 6.33 The second, inter-related and important ownership barrier is with regard to the stated intentions of owners and occupiers towards continuing the existing activity / use of a site as opposed to supporting its redevelopment for housing.
- 6.34 The analysis of HELAA sites prepared as part of the evidence base for the Oxford Local Plan record a significant level of owners / long-term leasehold occupiers who are either investing in the continued existing use of their site / building, or who have not given any consideration to re-development or change of use ('passive ownership') even where the site is extensively under-utilised (often termed as 'latent' brownfield land) or where there is clear potential for intensification.
- 6.35 Indeed, the conclusions of the HELAA that 53 potential sites (with a cautiously estimated NDA of some 62 Ha) are unavailable due to lack of landowner intent to pursue development / redevelopment points clearly to a need to work proactively to help resolve such issues, particularly where lease constraints are ostensibly the main practical barrier to bringing a site forward for housing.
- 6.36 To help unlock landownership and owner intention barriers there is a need to consider how, proactively (and within the bounds of available staff time resources), ownership information can be better captured and understood and how owner intentions can be challenged and also re-appraised over the Local Plan period to 2040.

- 6.37 There is also the potential to intervene further through land assembly and title accumulation programmes, re-organisation and re-location to help unlock ownership and owner / occupier inertia, resistance or reluctance to change.
- 6.38 A more proactive delivery approach would of course need to examine landowner intentions (as OCC's work has done to some extent), but it is also reasonable to anticipate that landowner intentions could well change over the longer term of the Plan period to 2040. This indicates the importance of maintaining accurate and updated / refreshed information on landownership and occupier intentions over time and proactively working on relationships for key sites and areas.



APPENDICES

Appendix A1: Reconsidered Rejected HELAA Sites

There are a number of sites 'Rejected' by the HELAA where it is possible to query the conclusions reached.

HELAA Site Ref	Site Name	Total (Ha)	NDA (Ha)	Location	Density Range Applied (dph)		Additional Housing Potential (Dwellings)		Unlocking Oxford's Growth Potential (Dwellings)
003	Summertown Strategic Site	8.4	5.46	GF Suburban	50	60	273	328	
052	Railway Lane, Littlemore	0.97	0.73	Suburban	50	60	36	44	
066	Windale House	0.78	0.74	Suburban	50	60	37	44	40
069	County Hall	0.33	0.31	City centre	100	120	31	38	35
071	Magistrates Court	0.3	0.29	City Centre	100	120	29	34	
078	Telephone Exchange (Speedwell Street)	0.4	0.38	City Centre	100	120	38	46	40
097	Scrap Yard, Jackdaw Lane	1.54	1.16	Suburban	50	60	58	69	
125	Summer Fields School Athletics site	1.38	1.04	Suburban	50	60	52	62	107
132	Wildlife Corridor at centre of Southfield Golf Course	12.62	8.20	GF Suburban	30	40	246	328	
292	Southfield Golf Course	50.45	32.79	GF Suburban	50	60	1,640	1,968	1,338
362	Former Cowley Road Bingo Hall	0.26	0.20	District Centre	100	120	20	23	
375	Headington Car Park	0.37	0.35	District Centre	100	120	35	42	27
381	Indoor Bowling Centre, Sandy West Lane	0.67	0.50	Suburban	50	60	25	30	36



UNDERSTANDING DATA



HELAA Site Ref	Site Name	Total (Ha)	NDA (Ha)	Location	Density Range Applied (dph)		Additional Housing Potential (Dwellings)		Unlocking Oxford's Growth Potential (Dwellings)
398	Land rear of Reliance Way	0.64	0.48	Suburban	50	60	24	29	12
411	Petrol Filling Station and Telephone Exchange, London Road	0.08	0.06	District Centre	100	120	6	7	
421	Snooker club, Cowley workers social club & New Testament Church of God,	0.4	0.38	District Centre	100	120	38	46	
438	Blanchford's Building Merchants/Builders yard	1.01	0.76	Suburban	50	60	38	45	52
454	Land opposite Foresters Tower between Wood Farm Road and Nuffield Road	0.3	0.29	Suburban	50	60	14	17	
459	Buildbase Watlington Road	2.32	1.74	Suburban	50	60	87	104	
475	Land at Cold Harbour campsite and behind Go Outdoors	2.33	1.75	Suburban	50	60	87	105	
492	Former Blackwells Publishing, Marston Street	0.51	0.48	District Centre	100	120	48	58	28
494	Warehouses off Kiln Lane	1.53	1.15	Suburban	50	60	57	69	75
604	The Royal British Legion, Lakefield Road	0.35	0.26	Suburban	50	60	13	16	
191 (pt)	Cowley Marsh playground	0.92	0.69	Suburban	50	60	35	41	
	Total	88.86	59.48				2,967	3,593	

Appendix A2: Sites Not Assessed by the HELAA Process

Sites that were not included in the HELAA process.

Location	Postcode	Site Area (Ha)	NDA (Ha)	Density Range Applied (dpa)		Additional Housing Potential (Dwellings)	
				Low	High	Low	High
Hotel Car Park Site adjacent to Kassam Stadium	OX44XP	0.4	0.3	50	60	16	19
Oxford Band hut neighbouring Car Wash Car Sales site	OX42FA	0.3	0.2	50	60	11	14
Mill Lane / Victoria Arms Drive		0.3	0.2	50	60	9	11
Summerfield, area in between HELAA sites 330, 310 and 153		2.0	1.5	50	60	75	90
Windale Primary School Sports field	OX4 6JD	0.4	0.3	50	60	15	18
Oriel College sports pitch	OX4 2AB	1.2	0.9	50	60	46	55
Haynes Road amenity space		0.2	0.2	50	60	8	10
Oxford Road Red Lion car park and adjacent	OX3 0PH	0.4	0.3	50	60	14	17
26, Maltfield Road	OX3 9RQ	0.2	0.2	50	60	8	10
Former Go Outdoors Store, Abingdon Road	OX1 4XN	0.5	0.4	50	60	18	22
Allotments at Barton Fields		2.4	1.8	50	60	90	108
Bullnose Morris, Blackbird Leys	OX4 6SS	0.3	0.2	50	60	11	14
Total		8.5	6.4			322	386



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