

3. Creating a pleasant place to live, delivering housing with a mixed and balanced community

3.1 Objectives

- To deliver as much housing as possible whilst balancing other important needs of the city's residents and businesses
- To deliver affordable housing and ensure that it meets the requirements of those in need
- To plan for an appropriate mix of housing sizes, types and tenures to meet the needs of existing and future residents as far as possible
- To ensure new homes are adaptable to the changing needs of the population and resulting from climate change, as well as being energy efficient to help reduce further climate change

Creating a place to live, delivering more housing

National Planning Policy says:

3.2 The *National Planning Policy Framework* (NPPF) requires Local Plans to support delivery of market and affordable housing to meet the needs of their area, unless this would compromise key sustainable development principles. It sets out what the government expects in terms of the evidence base requirements regarding housing need and supply; this includes a *Strategic Housing Market Assessment* (SHMA) to identify the Objectively Assessed Need; and a *Strategic Housing Land Availability Assessment* (SHLAA) to identify a supply of deliverable and developable housing sites (paragraph 47). The *Planning Practice Guidance* (PPG) supplements the NPPF to give more detail about these requirements.

3.3 The NPPF also requires Local Plans to set policies for meeting the affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (paragraph 50). The *Housing & Planning Act 2016* placed significant emphasis on broadening home ownership as a means to address the housing problems. Since then, the *Housing White Paper 2017* has changed the emphasis slightly away from home ownership and towards a wider range of tenures. In particular the *White Paper* proposes to update the government definition of affordable housing to include the following categories (Box 4 of *White Paper*):

- Social rent (guideline target rents determined by government rent policy)
- Affordable rent (no more than 80% of local market rent)
- Starter homes (at 20% discount on market value, for max household incomes of £80,000) and other discounted market sales housing
- Affordable private rent (at least 20% below local market rent)



- 3.4 The new definition therefore puts more emphasis than previous national policy on being below market values to rent or buy; however the definition does not link the proposals to people's actual ability to pay those levels so crucially it does not link affordability to local income levels, or explain how homes are kept affordable in perpetuity.
- 3.5 The government has also introduced a range of incentives in recent years to encourage delivery of more homes, which will also influence the delivery of homes and affordable homes in Oxford, for example: New Homes Bonus, changes to Permitted Development Rights (offices to residential), exempting certain developments from developer contributions towards affordable housing, Starter Homes and changes to Right to Buy.

The Oxford story – background evidence and the Sustainability Appraisal:

- 3.6 The huge and urgent need for more homes and the constrained supply in Oxford is well documented and frequently features in the press and research studies. The constrained housing supply and increasing unaffordability of homes in Oxford have significant sustainability impacts for those living and working in the City. Housing provision is a well-known key determinant in attracting and retaining people to support continued economic growth of the City, and therefore also impacts the wider region, as does the congestion on roads around Oxford resulting from people living further away from their jobs in the City.
- 3.7 The main evidence about housing need in Oxford is the *Oxfordshire Strategic Housing Market Assessment (SHMA)* which was commissioned by the six Oxfordshire local authorities. This partnership of the 5 District Councils, and County Council now forms the Oxfordshire Growth Board. The SHMA identifies the overall scale of housing need, as well as the mix of housing and range of tenures which the local population is likely to need in the 20 year period to 2031. It considers household and population projections, taking account of migration and demographic change. It also addresses the need for all types of housing, including affordable housing needs, and the needs of different groups in the community.
- 3.8 It brings this information together to identify the 'objectively assessed need' (OAN) for each district within the 'housing market area'. For Oxford the OAN is a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). For the purposes of the Local Plan the City Council is working to the mid-point of this range (i.e. 28,000). This approach aligns with that taken by the Oxfordshire Growth Board and by the other Oxfordshire Districts in their Local Plans. During the Local Plan 2036 process, some further technical work will be needed to roll forward the SHMA figures from 2031 to 2036, and there are also indications that Government is looking to change the methodology for calculating OAN (*Housing White Paper 2017*).
- 3.9 This identified need contrasts with the identified capacity for accommodating new housing in Oxford during that time. The *Oxford Housing and Economic Land Availability Assessment (HELAA)* assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The HELAA estimates the capacity to be 7,511 for the period 2016-2036. In the previous work, the 2014 *Strategic Housing Land Availability Assessment (SHLAA)*, a capacity for 10,212 dwellings for the period 2011-2031 was identified.
- 3.10 It has long been the case that Oxford does not have enough sites to meet its housing needs in full; this has been recognised by Inspectors of the

The main evidence about housing need in Oxford is the Oxfordshire Strategic Housing Market Assessment (SHMA)

previous Oxford Local Plan 2001-2016, and the Oxford Core Strategy. The “minimum figure” in the Oxford Core Strategy of 8,000 homes between 2006-2026 (average of 400 per year) is a constraint and capacity-based target. On average, and taking into account annual fluctuations in completions rates, this target has been largely met with 3,843 (net) cumulative completions in the 10 years since the start of the Core Strategy period in 2006/7.

- 3.11 The gap between the housing need of Oxford and capacity within the city boundary figures is ‘unmet need’. The City Council is working with the other Oxfordshire districts to ensure the overall housing needs of the Oxfordshire Housing Market Area are met in accordance with national policy. The City Council is working with the districts through the Oxfordshire Growth Board to help deliver 15,000 homes in the neighbouring districts by 2031. This is an agreed unmet need allocation, used as a working basis for current local plans in Oxfordshire which will be updated when the Oxford Local Plan is completed. The Growth Board has agreed an apportionment split of how much of the 15,000 is to be met in each district. The City Council is working with the district councils to ensure the apportioned unmet need is delivered through their local plans, and at appropriate locations. Those authorities are at various stages of preparing, or partially reviewing, their local plans to incorporate their allocated portion of the 15,000 homes.
- 3.12 This *Preferred Options Document* has not set out options for those developments in other districts, because they will be considered through their local plan processes. However it is proposed to set out in the Oxford Local Plan some place-shaping principles for the integration of potential future sustainable urban extensions to the city, located in adjacent local authorities administrative areas. This would help ensure that the urban extensions and their communities are as well integrated into Oxford as they can be both in function and appearance. The City Council will seek to ensure that the affordable housing element of these urban extensions takes into account the needs of Oxford residents, including nomination rights for the allocation of these affordable homes.
- 3.13 There is not only a shortage of homes in Oxford, but a shortage of homes that are affordable to local people. Buying a home in Oxford costs 16 times the average person’s salary, making it even less affordable to buy property than in London. There is a large private rented sector in Oxford and rental levels on the private market are also out of reach for many people so social rented housing (usually at about 40% of market cost) has been playing an important role in meeting needs in Oxford.
- 3.14 As set out in the SHMA, the estimated annual affordable housing need for Oxford is 1,029 additional affordable homes per year. To meet that need of 1,029 would require a delivery rate of 2,058 homes per year, working on an assumption that 50% of all of those homes are affordable.
- 3.15 There are currently 3,495 households on the Council’s Housing Register for social housing. This is likely to increase during the plan period as the supply of new affordable homes does not keep pace with the increase in need. Of the 7,500 affordable homes in the current stock, only on average 500-600 properties become available to let each year and other properties are being lost from the stock through Right to Buy.
- 3.16 Key employment sectors in Oxford are already facing significant challenges in recruiting and retaining staff as a result of the lack of access to and availability of affordable housing. Many of these groups of workers may not qualify for social rent but would qualify for intermediate housing

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options (for rent or sale) such as shared ownership if there were properties available. With such high house prices and private rents in Oxford, it means that even government schemes designed to assist such households with house buying such as the 20% first time buyer's discount and the proposed 'Starter Homes' initiative would still be far out of reach for many key workers, and even further out of reach for those seeking to move on from social rented tenures.

- 3.17 The *Sustainability Appraisal* highlights the potential positive impacts that could result from meeting as much of the objectively assessed need as possible by boosting housing supply (e.g. vibrant communities, housing, poverty, social exclusion and inequality). It also notes that aiming to meet the OAN in full by further prioritising housing over other policy aims would likely have a significant negative impact on flooding, biodiversity, urban design and heritage, climate change and economy. It will be important to prioritise housing delivery whilst balancing it with other sustainability considerations such as the need for jobs, so that housing should not be prioritised to such an extent that other considerations are unacceptably compromised. The SA further identified the potential positive impacts on a range of the SA objectives that would result from a policy approach that prioritises delivery of affordable housing.

Responses to first steps consultation:

- 3.17 Delivering housing, the right types, and total numbers, was a topic that received many comments in the consultation from across a range of stakeholders and interests. Comments highlighted that the lack of homes, and unaffordability, are significant concerns to residents and to major employers.
- 3.18 In terms of overall housing numbers, the responses suggest that providing the right types of homes is as important as providing enough homes. Primarily responses focused on the need for affordable housing, family-sized housing, and key worker housing. There were also some more specific comments about the validity of the *Strategic Housing Market Assessment* and which point within the range of identified housing need (24-32,000 homes) or which growth scenario Oxford should be taking forwards in the Plan.
- 3.19 Affordability (and unaffordability) of homes was a strong theme in comments, both in relation to key workers (to rent or to buy) and also affordable homes to rent (social rented and options for lower income households).
- 3.20 Comments were divided on the topic of delivering affordable housing through developer contributions (either on-site provision of homes, or through financial contributions), in terms of what the site size threshold should be, what the percentage requirement should be, and whether the current policies were restricting the supply of new housing or a disincentive to developers because of the potential impact on viability. Some people also suggested that there should be exceptions or different rules for key worker sites and for community-led sites. There was also divided opinion about whom or which jobs should be eligible for key worker affordable housing. There was support for the City Council's new Housing Company and comments identified the potential benefits it could bring in delivering affordable housing.

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Potential policy responses:

- 3.21 **Overall housing target for the plan period**
National policy aims to meet objectively-assessed housing needs in full, balanced with other sustainability considerations. The preferred option must also be realistic and deliverable. Oxford’s objectively assessed need calculated in the SHMA to 2031 would require a delivery of 1600 homes per year. To proceed with an option that sets a target for 1600 homes per year would clearly be unrealistic within the environmental and physical constraints of Oxford and not a sound policy approach because the evidence indicates that there are not nearly enough sites or unconstrained land opportunities (capacity) in Oxford to accommodate that level of growth.
- 3.22 It is therefore proposed to continue with a capacity-based approach to planning for homes in Oxford, which will set a target but which should be seen as a minimum to plan for but that can be exceeded in the event that windfall opportunities arise to deliver additional homes in Oxford, for example if a major landowner changes their intentions for a site.
- 3.23 Present evidence indicates that the physical capacity of the city will be for around 7-8,000 additional homes during the plan period, but further testing of sites is needed to further refine this figure. The capacity will also be influenced by the Preferred Options selected in other chapters of the plan, for example on density, high buildings, Green Belt and protection of green spaces. Adjusting any of those elements could potentially increase the number of homes that could be delivered. There is therefore a balance to be struck as to how far those other sustainability considerations can be flexed to maximise housing delivery, without unacceptably compromising on quality of life, ensuring communities are balanced, and delivering development that is sustainable now and in the future. The capacity will also be influenced by allocating additional sites for residential development up to 2036, whereas currently there are only sites allocated up to 2026.
- 3.24 With this preferred approach, there is always going to be a proportion of housing needs that cannot be met within Oxford. The City Council is already working in partnership with the other Oxfordshire authorities through the Oxfordshire Growth Board to address its unmet housing needs.

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Opt 9: Overall housing target for the plan period

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Set a capacity-based target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims.</p> <p>Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford’s administrative boundary</p>	<p>Current evidence indicates a capacity of just under 8,000 homes in the 20 year period to 2036 (HELAA). This already includes optimistic assumptions about some sites. This needs further testing to consider the sites in more detail to ensure an appropriate housing land supply could be maintained through the plan period.</p> <p>It may be possible that the sites and capacity identified in the HELAA can be further boosted through various policy adjustments, which are being explored through the local plan review, such as increasing densities, and reviewing Green Belt and the protection of open spaces. The target is therefore likely to be adjusted and refined as further evidence emerges and to reflect policy decisions in other elements of this emerging plan.</p> <p>This option also takes into account the on-going work with adjoining authorities within the strategic housing market area, to positively address needs that cannot be met in Oxford. Currently this is based on a working assumption that around 15,000 homes need to be met outside of Oxford by 2031, agreed by Oxfordshire</p>



	<p>Growth Board (September 2016). Further work will need to be undertaken to understand what this need would look like through to 2036 (the timescale of this plan). The more detailed assessment of sites and capacity through the local plan process will help to refine what the true unmet need figure is that needs to be met outside of Oxford.</p>
<p>B) Alternative Option: Continue current level of provision (400 per year, 8,000 total) (current Core Strategy policy, and average annual provision)</p>	<p>This option is similar to the average level of completions in recent years. The latest evidence about capacity for the plan period (which does not yet take into account all the possible policy revisions that might be taken forward in this new plan) indicates that this level of provision is likely to be deliverable. To be compliant with the objectives of national policy, all policy options should be explored to see if housing land supply could be boosted further to meet a greater proportion of Oxford's needs in a sustainable manner, for example increasing density, release of greenfield sites, and Green Belt sites. Other policy options in this Preferred Options Document address this point.</p>
<p>C) Rejected Option: Aim to meet the full Objectively Assessed Housing Need for Oxford within Oxford by significantly boosting housing supply and prioritising housing over other policy aims.</p>	<p>The evidence base, in particular the HELAA and before that the SHLAA, indicates that this option would be undeliverable. This would involve setting a housing target of around 1600 dwellings per year or 32,000 in total (as identified in the SHMA) over the plan period. Such a target is highly unlikely to be realistic or deliverable without allocating multiple major strategic scale housing sites, of which there are very few if any in Oxford because of the tight city boundary and environmental constraints. Housing completions over the last 10 years have averaged just under 400dpa which reflects that the majority of housing in Oxford is delivered on small brownfield sites of less than 10 units, and even at the highest rates of delivery have only reached 821pa. Furthermore the capacity calculations are nowhere near 32,000 homes, they are closer to 8,000 homes for the plan period.</p> <p>National policy aims to meet objectively-assessed housing needs in full; however this is balanced with other sustainability considerations. To proceed with an option for 1600 per year would be unrealistic within the environmental constraints and physical capacity of Oxford.</p> <p>Setting such a high target (even besides the fact that it couldn't be achieved) is also likely to result in a focus on the number of units rather than the quality or whether the homes are meeting needs or for proper placemaking in the city e.g. are they the right size or tenure for local people's needs. Pursuing the full total at all costs is likely to result in a disproportionate amount of 1-2 bed flats, and fewer family homes. This would make it more difficult to deliver mixed and balanced communities, or to meet the identified needs. It would also mean that very few, or potentially no sites, would be available for other uses including supporting uses that are needed alongside housing to create a sustainable city such as employment, retail, community uses.</p>

- 3.25 **Affordable housing - proportion of total and provision of tenure types**
 These options consider two aspects of affordable housing provision: how much affordable housing the plan is seeking to deliver as a proportion of total homes secured from developer contributions; and also which type of affordable housing is the priority i.e. whose housing needs are the focus of the policy.
- 3.26 Given the assessed need for affordable housing, the City Council will continue to seek to maximise delivery of affordable homes. Viability testing will be required to help define and support the level of affordable housing sought through the policies.
- 3.27 The preferred policy response seeks to continue to prioritise the housing needs of those who are least able to access homes on the open market and whose only option is social rent. However the current policy balance of affordable housing (80% social rent to 20% intermediate housing) may

not be the appropriate balance to continue because of clear needs from key workers and other sectors, and also wider changes in national policy beyond our control which will affect the successful delivery (and retention) of homes for social rent by the council or registered providers.

- 3.28 The need for affordable housing is so great, that delivering affordable housing from developer contributions will not be sufficient alone, and these policy approaches to deliver affordable housing from developer contributions will need to work alongside other council-led initiatives (such as the Housing Company), registered providers, and there will also be a role for key employers to play in addressing needs for their staff for example delivering affordable staff housing on development sites.

Opt 10: Determining the priority types of Affordable Housing

Policy approach	Consequences of approach/discussion
<p>A) Preferred option (Combination of A + B): Continue to prioritise delivery of social rented affordable housing, to ensure that the needs of those who can least afford housing in Oxford are prioritised. For example continue the current 80/20 split of affordable housing.</p>	<p>Prioritising social rent over intermediate forms of affordable housing puts the focus on the cheapest types of homes (in terms of rental cost to the resident), as even other forms of affordable rent are likely to be well above the levels of local housing authority rents. This will help to meet needs of people in the most vulnerable categories of the housing register.</p> <p>However this is likely to disadvantage other sectors of society, those who may have a slightly higher household income but yet for whom market rates are still out of reach particularly to buy in Oxford. This risks polarisation in the housing market, leading to a position where only high income households, or those in the greatest housing need, are able to live in Oxford and households in-between get squeezed out. It may also reduce the opportunity for new emerging tenures such as co-housing or land trust models that seek to ensure permanent affordability through alternative models of delivery.</p> <p>There are also implications in terms of development viability, because schemes generate less viability from social rent units than they might do from intermediate forms of affordable housing, such as shared ownership. Therefore this option may result in sites being able to support a lower total number of affordable housing units overall.</p> <p>The success of this option will also be influenced by national policy changes outside of the planning system, such as the changing policy on Right to Buy which has resulted in losses of social rent units in Oxford in recent years, and also welfare reform such as the caps on housing benefits imposed by national policy.</p>
<p>B) Preferred option (Combination of A + B): In certain circumstances (when meeting employment sector specific needs, delivering a affordable housing in perpetuity and linked to incomes) prioritise the total number of affordable housing units by readdressing the balance between social rent and intermediate forms of affordable housing (which might include affordable homes to rent at no more than 80% of market rates).</p> <p>(This option relates directly to the "Meeting intermediate housing or employment sector specific needs based on local affordability approaches" option a below.)</p>	<p>It is likely to be possible to secure a greater number of affordable housing units in total if the policy allows more flexibility in terms of tenure mix. In particular a reduction in the level of social rented units required in favour of intermediate tenures would likely have viability benefits and as such allow a greater total number of affordable units.</p> <p>This option may also help to improve viability of marginal profit schemes, which overall may help to provide more affordable housing. However affordable housing to purchase tends to be more difficult to retain in perpetuity so may not be a long term solution. To mitigate this, the policy could prioritise those forms of intermediate affordable housing which deliver permanent affordability, such as a trust model.</p> <p>Shifting the balance to put more emphasis on intermediate forms of affordable housing (away from social rent) will help to address the needs of a wider range of households and needs. This will help to deliver mixed and balanced communities by having a wider range of tenures and forms of homes. Although any move away from the focus on social rent will make it even harder to meet the needs of those in the community that are in most housing need and</p>

	<p>it would take longer for those on the housing register to receive a home. 80% of market rents will be unaffordable to many in Oxford.</p> <p>The relationship between the tenure mix and overall percentage of affordable housing will need to be carefully addressed.</p>
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Opt 11: Determining the approach to setting the level of the Affordable Housing requirement

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Continue with current approach to prioritise delivery of affordable housing, requiring a proportion of affordable housing. A robust % target will be set, based on viability testing. Currently, 50% affordable housing is required.</p>	<p>With continuing affordability issues for residents seeking homes to rent or buy on the open market in Oxford, then this option which seeks for the affordable housing target to be as high as viability will allow, is likely to achieve the greatest number of affordable homes and address the greatest needs.</p> <p>There is no evidence that the current approach has negatively affected the delivery of homes, or that sites are stalling as a result of viability, because the policy already includes flexibility to negotiate if the developer has evidence that the requirements would make the scheme unviable. Similar mechanisms would need to apply if taking forwards this policy approach, so as to ensure that the policy requirements do not have a negative effect on housing delivery in Oxford. Equally there is no guarantee that a lesser contribution requirement would deliver any greater number of homes or any faster, because the other constraints remain including a lack of available sites. It is also of note that often when planning applications are presented as unable to support the full contribution of affordable housing, it is because too high a price has been paid for the land or the land value has been over-inflated by 'hope value' rather than other cost elements (such as materials or developer profit). It is not for the public purse to subsidise such investment decisions, or to compromise those in need of affordable housing for the benefit of individual landowners.</p> <p>Further viability testing will be carried out as part of the Local Plan project across a sample of sites to assess if 50% remains an appropriate target.</p>
<p>B) Alternative Option: Consider a reduced affordable housing percentage requirement from developers on a site by site basis if the affordable dwellings were of a size in greatest need in Oxford (i.e. 2+ bedrooms or 3/4 + bedspaces).</p>	<p>This option needs to be considered alongside the options for housing mix (or balance of dwellings). It may be that on some specific proposals, it makes more sense to seek fewer larger units if those would meet an identified need, rather than end up with 1 or 2 bed units which may not meet need but meet targets.</p>
<p>C) Rejected Option: Reduce the overall proportion of affordable housing required, do not seek to maximise affordable housing, and instead focus on delivering other public benefits funded from developer contributions e.g. infrastructure improvements.</p>	<p>This option would deliver less affordable housing. The level of affordable housing need would progressively worsen as the rate of supply would slow whilst the rate of demand would continue unchanged. This approach would likely store up bigger affordability issues to be dealt with in future plans.</p>

- 3.29 **Meeting intermediate housing need to reflect local affordability**
 These options consider which forms of 'intermediate' affordable housing are likely to be most effective in addressing needs in the Oxford context, for those people that do not qualify for social rent but yet who struggle to afford to rent or buy at market rates.

- 3.30 Evidence indicates that the relationship between sales values and average salary in Oxford is now such that even with many of the government initiatives that are designed to make homes more affordable, such as

shared ownership and starter homes, home ownership is still out of the reach of many people in Oxford. Therefore these options consider which intermediate tenures are most likely to be accessible to those who are caught between not qualifying for social rent, but who cannot afford to rent or buy at full market prices.

- 3.31 Government initiatives in recent years have generally prioritised home ownership as an aspiration (although indications in the recent Housing White Paper suggest that this long-held position is now shifting to recognise that home ownership is so far beyond the reach of many people). The extreme unaffordability in Oxford, and the relationship of average salary to house prices mean that many of the purchase options for affordable housing (such as shared ownership, equity loans, and starter homes) are often still not affordable to many people in Oxford. The City Council will carry out an assessment of the affordability of the range of tenures listed in the Housing White Paper to inform the policy approach; this will help ensure that affordable housing is accessible to a wide range of people in need and that homes stay affordable in perpetuity for longer term benefits.
- 3.32 Historically the badge of 'key worker' has been used to cover many of the people that might fall into this category, and as such the current policy includes a definition of key worker which identifies certain professions or key employers in Oxford, which make people eligible for certain discounted-housing options to rent or buy. However this approach can also exclude many people on lower incomes, and defining a 'key worker' is very subjective. A fairer and clearer policy approach therefore is suggested, to focus the provision of intermediate homes linking eligibility to local incomes and local house prices, which will help to ensure that those homes are targeted to those in greatest need. This is a change from current policy approaches.
- 3.33 Alongside this another new policy response is suggested, which would support an approach of employers in Oxford who are experiencing recruitment and retention issues to help address the issue by directly providing affordable homes for their staff in the form of staff accommodation or employment-linked homes (occupancy to be secured to staff by legal agreement). If necessary to make this viable, it may be that a reduced requirement of other affordable housing is delivered as part of this, for example if a proposal is providing greater than 50% affordable already.
- 3.34 This potentially leads to a dual approach position on affordable housing contributions. The standard policy approach would seek the maximum level affordable housing that would be viable (e.g. 50% subject to further viability testing) with a focus on social rent. However, an alternative policy would apply in those circumstances where developers are looking to "over-provide" affordable housing (i.e. exceed the 50% requirement, even going up to 100% affordable); in such circumstances it may be justified to provide a reduced (or even zero) percentage of social rented housing. This alternative policy would allow developers (such as those providing housing for their own employees) to deliver a fully affordable scheme, but with an affordable tenure mix that varies from the norm (e.g. significantly less social rent and more intermediate) in order to support viability. The net outcome for the city would be delivery of more affordable homes overall, but fewer homes available for social rent.

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Opt 12: Meeting intermediate housing or employment sector specific needs based on local affordability approaches

Policy approach	Consequences of approach/discussion
<p>A) Preferred option (Combination of A + B + C): On specified sites, allow schemes that are up to 100% intermediate housing, with reduced or no element of social rent housing required. This could apply to University and Hospital Trust sites to support key staff; school campus sites, or other staff accommodation schemes.</p>	<p>This option would support some of the major employers in Oxford who own land to help them meet their own housing need and add to the overall supply of housing in the city. This approach would encourage key employers to proactively plan to help to address the housing needs of their own staff. This in turn is likely to help recruitment and retention issues, if they are able to offer housing to their staff.</p> <p>The benefits of the policy are likely to be most positive for employers with land holdings available for development, or who are able to incorporate housing in mixed use development and the ability to finance and deliver employee related housing. However, by exempting developments from provision of/contributing to social rent or other affordable housing, it would exclude and disadvantage other lower-paid workers in need of affordable housing in Oxford. To mitigate this, it would be important that any such policy included mechanisms to ensure that the housing provided would be available as affordable in perpetuity and that the employer's accommodation allocation and rent policy is linked to income levels and affordability across the range of employment roles that support that economic sector, rather than just to a sector or organisation, to ensure that the homes being provided are truly affordable. One way to ensure the homes are and remain truly affordable linked to incomes, is for the employer to agree the allocations priorities/criteria and rent formula with the local authority, and to commit to provide regular monitoring about the rental of the properties.</p> <p>This option may be appropriate for certain sites where the development is providing in excess of the usual affordable housing target e.g. if the scheme is 100% affordable homes with no market housing, then within that it may be appropriate to reduce the usual social rent or other affordable element. The proportion of social rented housing (that will be reduced from 40%) that will be required will be determined following viability testing of the options.</p>
<p>B) Preferred option (Combination of A + B + C): For intermediate forms of affordable housing, prioritise homes for rent, such as affordable rent.</p>	<p>There may be those with aspirations for home ownership who move out of Oxford where market prices to buy are cheaper. Availability of shared ownership is unlikely to change this phenomenon, Affordable homes for rent are more likely (than sale units) to be kept affordable in perpetuity for the longer term benefit to the community. Homes to rent are also more likely to be accessible to a wider range of people (than home ownership) in Oxford due to high prices to buy and the large deposits needed to buy somewhere. So this option is likely to meet a wider range of needs.</p> <p>This option ensures affordable homes remain so in perpetuity, and is also likely to be affordable to a greater range of income levels. Prioritising housing for rent only would also allow homes to potentially be tied to employment or restricted occupancy, which helps to prioritise who the homes go to and helps to protect future supply. There is also the option of tying the homes to income levels with variable rents to reflect circumstances.</p> <p>Emerging changes in national policy are seeking to give longer term security to those renting, which would help make this option more successful in meeting needs.</p>
<p>C) Preferred option (Combination of A + B + C): Have a specific local affordability policy pegged to local incomes and house prices, rather than occupations or employment sectors.</p>	<p>Linking eligibility to local incomes and local house prices, will be fairer and clearer and will help to ensure that those homes are targeted to those in greatest need, as well as focussing on forms of housing that are truly affordable in the Oxford context. For example starter homes as defined in national guidance, are unlikely to be accessible to those on average wages in Oxford, so is not likely to be a truly affordable intermediate option. Other cities including London and Manchester have been exploring this type of approach and the City Council could look to develop this further for the Oxford context.</p>

	<p>A generally-accepted benchmark is that approximately 30% of household income is spent on housing. This suggests that intermediate housing rent or sales values should be aiming for the 1/3 mark.</p>
<p>D) Alternative Option: Take a policy approach that tries to balance affordable homes for rent and affordable homes for sale (such as starter homes, or shared ownership) to give people more choice about intermediate affordable housing options.</p>	<p>This option helps to give people more choices to reflect different aspirations relating to renting or buying homes, and changing personal circumstances.</p> <p>There is already a higher than average proportion of renting in Oxford, and this approach could help to address the current situation where people trying to get onto the housing ladder for the first time are forced to move outside of Oxford because of the lack of affordable options to purchase.</p> <p>There is a practical query about how homes to buy would be retained as affordable housing in perpetuity, which would need to be addressed through the policy.</p>
<p>E) Rejected Option: Continue to support 'key worker' housing as specific sub-category of intermediate housing, defined based on identified sectors/organisations/roles</p>	<p>This option helps to address the demand for so-called 'key worker' housing alongside providing for people with other housing needs.</p> <p>Current adopted policies support key worker housing contributing up to 20% of the affordable housing requirement, with the remainder to be social rent. Viability and other evidence in the local plan may indicate that this split should be revisited to shift the balance to deliver slightly more key worker accommodation.</p> <p>This option would involve developing an 'Oxford' definition of key workers to identify those who would qualify (and those who would not).</p> <p>The traditional definition refers to professional roles such as teachers, nurses and police, but the essential jobs that support those roles such as cleaners or administrative staff or bus drivers to get those people to work, and who may be even lower paid, may get overlooked in this approach. Alternatively if the scope is broadened then there is a risk that this option would end up including so many people within the definition that it makes it difficult to prioritise the limited supply of homes.</p>

- 3.35 **Providing affordable housing from larger sites**
These options consider which proposals and sites will be required to provide on-site affordable housing as part of any scheme. A policy threshold will be required (in terms of site size and number of proposed homes) over which the policy will be triggered.
- 3.36 Provision of affordable housing on-site is important and preferred because it helps to deliver mixed and balanced communities by delivering affordable housing more widely distributed across the Oxford. Provision on-site by the developer also helps to address the issue of the lack of sites available.
- 3.37 Further viability testing will be commissioned which will consider the threshold, the percentage of affordable housing and the mix of affordable housing to be delivered on sites. There may also a role for allowing a combination of onsite and offsite contributions or for cross-site offsetting, but this should only be on a case by case basis and the expectation should still be to seek onsite provision; this will be the starting point in any such negotiations.

Opt 13: Providing affordable housing from larger sites

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Continue to require provision of onsite affordable housing for developments of 10 units or more, or on sites of 0.25ha or greater.</p>	<p>This approach follows current policy and experience has demonstrated that this option is likely most likely to be deliverable and to achieve sustainable development. Further viability testing will be required to help establish the</p>

	<p>target level of provision. Provision of affordable housing on-site helps to deliver mixed and balanced communities by delivering affordable housing more widely distributed across the city, including in the higher value areas. Provision on-site by the developer also helps to address the issue of the lack of sites available.</p> <p>Further viability testing is needed to confirm if this is the most appropriate threshold. A threshold of 11 units would be in line with national policy. If density or other design policies such as heights change in the local plan, then the site size of 0.25ha may need to be reduced because more units may then be deliverable on smaller sites.</p>
<p>B) Alternative Option: Do not have a fixed threshold for on-site provision, have a sliding scale, which varies for different site sizes or number of units, so that smaller sites do not require the full provision. For example sites 10-20 units require a lower on-site % provision than sites of 20+ units.</p>	<p>This option allows more flexibility, to achieve onsite provision, similar to the current 'cascade' policy approach to delivering affordable housing on-site. It is a less transparent process to follow and gives less certainty to developers or communities.</p>
<p>C) Alternative Option: Reduce the threshold from 10 dwellings/0.25ha for onsite provision of affordable housing (for example for developments of 8 units or more/0.2ha).</p>	<p>This option may result in more sites being brought forward with on-site affordable housing. However it may put off some developers from bringing forward sites of 8-10 units. This requires further viability testing.</p>
<p>D) Rejected Option: Increase the threshold from 10 dwellings/0.25ha for onsite provision of affordable housing (for example increase to developments of 20 units or more)</p>	<p>If the site size or number of units threshold was to increase, say to 20 units, there would be a significantly fewer number of developments delivering affordable housing on-site, and likely to result in far fewer affordable homes being delivered. For example in the last five years, fewer than five sites per year have been developments of 20+ units, and some years there have been no sites at all of 20+ units.</p>
<p>E) Alternative Option: Allow flexibility to include an element of both onsite and offsite contributions. Consider cross-site provision/offsets.</p>	<p>There is a risk that this option would result in significantly less affordable housing being provided in the high value, more affluent parts of Oxford. Financially developers are likely to choose to off-set the affordable provision on sites in less desirable lower land value areas, or to opt for off-site contributions in order to maximise the sales values on the main site. This will not help to deliver mixed and balanced communities, or to address inequalities across Oxford.</p> <p>It is also a less transparent process to follow and gives less certainty to developers or communities.</p> <p>However there may be a case for exceptions on a site by site basis, for example where it would result in a better overall design, or for viability reasons, but the starting point should be to look to on-site provision first. Exceptions justified as material considerations can always be considered through the development management process.</p>

3.38 Affordable housing financial contributions from small sites

These options consider the site size or unit threshold which should be used for requiring the financial contributions towards affordable housing from small sites. There is no evidence that the existing policy has negatively affected delivery of sites since it was introduced in 2013, and furthermore small sites make up the large majority of housing applications each year in Oxford and as such have potential to make a significant contribution cumulatively to the aims of delivering affordable housing, alongside other initiatives and policy approaches.

- 3.39 There has been substantial change and uncertainty in national policy over recent years regarding affordable housing provision from small sites (defined as 10 or fewer units or no more than 1000m² gross internal area). The current position as set out in the *Written Ministerial Statement (WMS, 2014)* and subsequent changes to the PPG, is that affordable housing contributions would normally not be sought from small sites. However case law and guidance from the Planning Inspectorate has clarified that this position does not automatically outweigh relevant development plan policies (such as HP4). Rather, it is for the decision-maker to consider the development plan and the local evidence of affordable housing need, and to use their judgement as to where the balance should lie between local circumstances and the WMS, in determining planning applications. It has also been clarified that local circumstances and evidence may justify having local plan policies with thresholds below those in national policy.
- 3.40 The City Council has therefore taken into account the WMS in options for the future Local Plan policy approach, as well as the significant and substantial weight to the evidence supporting the need for continuing to seek an affordable housing contribution from small site developments. On balance, the City Council position is that specific local circumstances exist in Oxford related to the need for and provision of affordable housing in Oxford, and exceptional levels of unaffordability, which justify continuing to seek affordable housing contributions from sites of 10 or less dwellings as an exception to national policy.
- 3.41 Subject to viability testing, it is suggested that the threshold be lowered to two units (currently it is four units). Many of these smallest (2-4 units) developments are exempt from CIL or other contributions, yet they make up a significant proportion of housing delivery in Oxford. Cumulatively the financial contributions that could be achieved could help to deliver new affordable homes alongside other mechanisms for delivering affordable homes. Viability testing will help to identify if this smallest category should contribute at a reduced financial rate from the slightly larger small sites. Also to be explored through further viability testing, is whether there is a better way to calculate the contribution for each site. Currently the calculation seeks 15% of final sales values (GDV) of the development, but in some cases this leads to lengthy negotiations and viability appraisal exercises if the applicant and council cannot reach an agreed position. Alternative approaches could be a flat-rate tariff per unit, or to calculate it by floorspace rather than sales value which would be less open to interpretation and more easily measured similar to the affordable housing contribution from student accommodation developments.

Opt 14: Affordable housing financial contributions from small sites

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Require an off-site financial contribution towards affordable housing from sites with a capacity for 2-9 dwellings.</p>	<p>The current policy approach seeks contributions from small sites of 4-9 dwellings. There is no evidence that this has negatively affected the delivery of homes or sites, since the policy was introduced in 2013. Viability evidence at that time indicated that most sites of less than 10 homes could make a financial contribution.</p> <p>Many of the smallest developments (2-4 units) are now exempt from CIL or other contributions, yet they make up a significant proportion of housing delivery in Oxford so cumulatively the financial contributions that could be achieved could help to deliver new affordable homes alongside other mechanisms for delivering affordable homes. Viability testing will help to identify if this smallest category should contribute at a reduced financial rate.</p>

	<p>Requiring a contribution rather than onsite provision is often more practical in terms of site design, and also from a management perspective for the Registered Provider. The main limitation with this option is that an increasing proportion of development proposals are exempt from making contributions as a result of government changes, such as office to residential permitted development so it may be limited how often contributions can be collected from these types of developments.</p> <p>If the contribution were to continue to be the final sales value, it is likely to assist the cash flow (and thus viability) for smaller developments and make the contribution less of a burden/more deliverable because it is not fixed at the start, and also because it is not required until later on helping small businesses cash flow. Further viability evidence would be needed to test whether 15% Gross Development Value is still the appropriate target.</p>
<p>B) Alternative Option: Continue to require an off-site financial contribution towards affordable housing from sites with a capacity for 4-9 dwellings.</p>	<p>This option would have the same benefits as the preferred option; however it would continue to apply only to schemes of 4-9 dwellings as at present. A significant number of proposals come forward in Oxford on sites of 2 or 3 dwellings and under this approach those would continue to be exempt from making contributions towards affordable housing. This would mean that (subject to viability testing) potential additional contributions towards would be forgone.</p>
<p>C) Preferred option: Adjust the mechanism of calculating contribution (currently calculated on number of dwellings or site area). Alternatives could be a flat rate tariff per unit, or to calculate the contribution based on floorspace of the development (similar to CIL process).</p>	<p>This option would be simpler and more transparent for developers to apply, and for the local authority to assess at the time of submission of planning applications, in a similar approach to how CIL is currently applied. This could help to reduce lengthy negotiations and give more certainty to developers when analysing viability at the outset. This needs further viability testing to identify which mechanisms and rates could be appropriate and effective for Oxford.</p>
<p>D) Alternative Option: Increase the financial contribution in light of the fact that more small developments are now CIL exempt (starter homes and prior approvals) and so those developments have lower development costs if they are not paying CIL.</p>	<p>As above, except this option would need further viability evidence to see if the market could deliver a higher contribution and what the likely impact would be so as not to present a disproportionate burden which could negatively impact on the supply of homes from small sites, which make up an important element of housing delivery in Oxford each year.</p>
<p>E) Rejected Option: Reduce the level of the financial contribution from small sites, which could include differential levels of contribution depending on the size of development.</p>	<p>A graduated scale of contributions according to development size may help smaller builders/local businesses to bring forward schemes. This could be implemented in a number of ways – number of bedrooms, GDV, floorspace, or site area. This would be a more flexible approach to reflect circumstances of individual developments. Although there are also alternative ways of ensuring the policy is flexible, such as continuing the current ‘cascade’ approach which allows developers to present open-book viability information if they feel the proposal cannot withstand to deliver the required contributions.</p>
<p>F) Rejected Option: Do not require a contribution for affordable housing from sites of less than 10 dwellings, to encourage small sites to come forward and help small builders/local businesses</p>	<p>This option mirrors the general national policy however there is provision in the national policy for a variation subject to local exceptional circumstances. The City Council maintains that the significant and pressing need for affordable housing in Oxford is justifiably an exception and so continues to apply local policy as an exemption to the Ministerial Statement. Small sites form the majority of housing sites that come forward in the constrained urban area of Oxford. There would be a substantial negative impact on delivery of affordable housing with this option. There is no clear evidence that it would result in increased overall housing delivery rates.</p>

- 3.42 **Contributions towards affordable housing from other development**
 The affordable housing need in Oxford is so great that all options must be explored for addressing it. As such, the preferred policy response is to seek contributions not only from residential development but also from other types of developments, subject to viability testing. The threshold for the application of the policy and the level of the contribution would need to be carefully considered.

Opt 15: Contributions towards affordable housing from other development

Policy approach	Consequences of approach/discussion
<p>A) Preferred Option (Combination of A + C + E + G): Continue to require financial contributions towards affordable housing from student accommodation developments.</p>	<p>This helps to ensure that student accommodation development is not at the expense of tackling the affordable housing crisis, because often sites which are developed for student accommodation would have also been suitable for residential.</p> <p>Note: this refers to non-self-contained student accommodation units. Self-contained units are subject to the main affordable housing policies.</p> <p>This option will help to increase the rate of delivery of affordable homes across Oxford (as does current policy).</p> <p>Evidence from recent planning applications indicates that student accommodation generates more value than other land uses in Oxford even including C3 residential. As such there is no indication that current levels of contribution towards affordable housing from student accommodation is negatively impacting on delivery of student accommodation. This is subject to further viability testing.</p>
<p>B) Rejected Option: Do not require financial contributions towards affordable housing from student accommodation developments.</p>	<p>This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. If such developments were exempted from contributions then it could further incentivise this kind of development rather than residential which is the highest priority housing form in the city. This impact would be exacerbated as sites suitable for student accommodation are likely to be also suitable for housing.</p>
<p>C) Preferred Option (Combination of A + C + E + G): Continue to require affordable housing contributions from any self-contained units of accommodation within C2 care home/residential institution developments (e.g. staff accommodation), (either financial contributions or onsite affordable housing provision where appropriate).</p>	<p>If there are self-contained units (C3) delivered as part of a C2 care home/residential institution development then the usual residential policies should apply (see options earlier in this chapter about onsite and offsite contributions). This is subject to further viability testing.</p>
<p>D) Rejected Option: Do not require financial contributions towards affordable housing from self-contained units of accommodation within C2 developments.</p>	<p>It would not be equitable to exempt self-contained homes from making financial contributions towards affordable housing simply because they form part of a wider C2 development when they would otherwise be subject to the normal affordable housing policies.</p>
<p>E) Preferred Option (Combination of A + C + E + G): Continue to require affordable housing contributions from commercial developments (either financial contributions or onsite affordable housing provision where appropriate).</p>	<p>This option will help to address that new jobs are likely to generate need for new homes by encouraging workers to move to Oxford. As such, it is reasonable to expect such developments to contribute towards meeting the need for affordable housing in Oxford.</p> <p>Currently an indicative threshold of 2000m² is applied, with smaller developments considered on a case by case basis. The calculation is based on the likely number of net new jobs. This is subject to further viability testing.</p>

<p>F) Rejected Option: Do not require financial contributions towards affordable housing from commercial developments.</p>	<p>This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. The link between commercial development and demand for affordable housing provision is well established.</p>
<p>G) Preferred Option (Combination of A + C + E + G): Require affordable housing contributions from purpose-built HMO or non-self-contained C4 developments (either financial contributions or onsite affordable housing provision where appropriate). Would not apply to C3 to C4 conversions.</p>	<p>This helps to ensure that HMO or other C4 development is not at the expense of tackling the affordable housing crisis. Currently this is not a common form of development in Oxford but it may become more popular during the plan period, especially if employers are looking to develop staff accommodation. It is likely that some sites which would have also been suitable for residential may be lost to this purpose, so it is therefore appropriate to seek a contribution towards affordable housing to ensure that such developments are not at the cost of tackling affordable housing issues. Furthermore, if such developments were exempted from contributions then it could skew the market by inadvertently incentivising this kind of development rather than residential. This is subject to further viability testing.</p>
<p>H) Rejected Option: Do not require financial contributions towards affordable housing from purpose-built HMO or non-self-contained C4 developments.</p>	<p>This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. If such developments were exempted from contributions then it could further incentivise this kind of development rather than residential which is the highest priority housing form in the city. This impact would be exacerbated as sites suitable for purpose-built HMO or non-self-contained C4 developments are likely to be also suitable for housing.</p>

Creating a mixed and balanced community

National Planning Policy says:

- 3.43 The NPPF requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. It also compels authorities to identify the size, type, tenure and range of housing that is required to reflect local needs (paragraph 50). Overall the aim should be to create mixed and balanced communities.

The Oxford story – background evidence and the Sustainability Appraisal:

- 3.44 Generally the mix of dwelling sizes in Oxford differs from the surrounding more rural areas. The mix in Oxford tends to be higher density development and typically smaller homes, with a higher than average proportion of 1 and 2 bed properties at 43%, compared to 34% across the Oxfordshire Housing Market Area (HMA), or 38% across the South East. This reflects the urban nature of Oxford.
- 3.45 A strong supply of smaller units was leading to a mismatch with the housing needs of the city population, so the City Council adopted a policy approach to steer the mix of house sizes in developments. The Balance of *Dwellings Supplementary Planning Document (SPD)* was published in 2008. The SPD sets out a prescribed mix of dwelling sizes for developments depending on their location and scale. The mix varies for different parts of Oxford but generally the emphasis is towards 3 bed units, to address the need for medium sized dwellings. Housing mix was also considered in the *Strategic Housing Market Assessment (SHMA Tables 65, 66)* which identified a mix not dissimilar from the ranges in the SPD and emphasises the need for 3 bedroom dwellings particularly in market homes.
- 3.46 Despite the identified need for more medium sized homes, in recent years there has generally been a trend towards provision of smaller houses and flats, in response to market factors and high land values, which mean that

developers may seek to maximise the number of units on a site. Another significant factor that influences the type and size of homes delivered is that many developments in Oxford are small sites including conversions and garden land developments which lend themselves towards smaller sized residential units. In 2014/15 nearly 80% of new homes were 1 or 2 bedroom properties. Even with current policies that seek to steer the housing mix in place, many developments either fall below the Balance of Dwellings policy threshold (the policy only applies to developments of 4 or more dwellings) or are exempt from the current policies because they are developed under Permitted Development Rights or Prior Approval applications. Larger sites, such as Barton Park, remain important in helping to deliver significant numbers of larger properties for families. With very few large sites to accommodate a mix of sizes, and future delivery likely to be reliant substantially on small sites, urban renewal and brownfield infill sites, this trend is likely to continue.

- 3.47 Oxford has a high percentage of Houses in Multiple Occupation (HMOs). With an estimated 20% of Oxford's population living in an HMO they play an important role in meeting housing needs in Oxford. For many people, they offer a more affordable solution than renting individually or buying a property when prices are so high in Oxford.
- 3.48 In some areas of Oxford though, the high concentrations of HMOs are resulting in changes to the character of the local area, and can contribute to local parking problems, large numbers of transient households, and the affordability of renting or buying homes in Oxford. This has led some people to believe that their communities are becoming unbalanced because the number of short-term tenants with less-established community ties has increased.
- 3.49 The City Council through its licencing scheme has a very proactive approach to ensuring that all HMOs are licensed and that these properties are well managed both in terms of the tenants and the potential impacts on surrounding communities. Loss of larger homes, usually to conversions to flats or to HMOs, can help to meet housing needs but can also lead to a shortage of accommodation for families. In 2014/15 applications were approved for 30 new HMOs across Oxford. In the context of increasing house prices, this trend is likely to continue to increase as more people turn to this as a more affordable way to live in Oxford.
- 3.50 The SA identifies potential positive impacts from including a policy approach that seeks to deliver a range and mix of housing types to reflect the varying needs in the community. It notes the significant role of housing policies in retaining mixed vibrant communities, and diversity, and addressing poverty, social exclusion and inequalities that exist between parts of Oxford.

Responses to first steps consultation:

- 3.51 The majority of people who responded to the consultation (213) either agreed or strongly agreed that a mix of home sizes (number of bedrooms) should be required through the Local Plan; in comparison 9 people disagreed or strongly disagreed. However a couple of respondents commented that they considered that the current Balance of Dwellings approach is flawed. A number of respondents commented that there should be more flats although the reasons varied from being able to increase density to smaller homes being more affordable and to make sure that larger units are left available for larger families. There were few comments specifically on Houses in Multiple Occupation and those views were mixed.

**Oxford
has a high
percentage
of Houses
in Multiple
Occupation**



Potential policy responses:

Opt 16: Mix of dwelling sizes to maintain and deliver balanced communities ('balance of dwellings')

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Continue to require the mix of dwelling sizes to meet need and prioritise larger units (3+ beds) in key areas.</p>	<p>This option focuses more on delivering the right size or type of homes to meet local needs. This might not result in the greatest number of units on a site, but will be addressing specific local needs and will help to support mixed and balanced communities that the market might not otherwise deliver without such a policy. Evidence (SHMA and housing register) indicate that there is still a significant need for family units, and that typically the market is choosing to deliver much more 1-2 bed homes. 3 bed units may be unaffordable to many people on the open market.</p> <p>The required mix could be set in a Supplementary Planning Document (SPD) or similar. Documents such as SPDs are more flexible to respond to changing needs during the plan period, for example to changes in the housing register.</p>
<p>B) Alternative Option: Do not specify a mix for market homes but specify a mix for affordable homes/the affordable element of mixed developments.</p>	<p>This option would leave it to the market to determine the mix for market units, but specify a mix for affordable homes only. This is particularly important for addressing the needs on the housing register for social rent and intermediate homes. Having a split approach on sites with market and affordable units will make it more difficult to be tenure-blind for integrated communities.</p>
<p>C) Rejected Option: Do not set a required mix of dwelling sizes and allow the market to dictate provision.</p>	<p>This option is likely to result in housing mixes on sites which deliver the greatest profit return for developers. It is the least likely option to meet local housing needs and to deliver mixed and balanced communities. It is likely to exacerbate the current mismatch between need and supply.</p> <p>The impact of this is likely to vary across different types of sites and locations in Oxford. In some areas it might result in a greater number of smaller units to achieve maximum density. On other, high value, areas it might even result in a reduced density if that makes a greater return (and may be used by developers to by-pass affordable housing provision).</p> <p>Provides the greatest flexibility for site design to respond to context.</p>
<p>D) Rejected Option: Prioritise smaller units (1-2 bed) homes to deliver a higher number of homes towards Oxford's Objectively Assessed Need / urban intensification.</p>	<p>On average there are already a large proportion of 1-2 bed developments being brought forward by the market each year, because sites are typically on very small infill sites or are conversions of existing dwellings, which only lend themselves to smaller units. Over the last 10 years more than 60% of completions each year tend to be 1-2 beds, even in the context of policies to support the delivery of family-sized homes, so taking forward this policy would further exacerbate these trends.</p> <p>Whilst this might deliver more units towards meeting the Objectively Assessed housing Need they would not meet the identified needs of either the housing register or the wider community, and would not support mixed and balanced communities as families would be increasingly pushed to move outside of Oxford.</p>

Opt 17: Thresholds for mix of dwelling sizes ('balance of dwellings')

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Raise the threshold at which the policy applies; specifying a housing mix only for larger strategic scale developments (e.g. 25+ units).</p>	<p>The current policy applies to sites of 10 units and above in the city and district centres, and has two thresholds of 4-9 and 10-24 units in other areas. The policy is only triggered for a very small number of planning applications per year (usually no more than 10 sites), because so much development in Oxford is on smaller sites, and also some developments are exempted from the policy under permitted development changes introduced by government since the policy was adopted (such as office to residential permitted developments).</p>

	It makes sense to focus the mix policy to influence the larger strategic scale sites where there is more realistic opportunity to shape the dwelling mix towards meeting identified needs, in particular to deliver family-sized homes. In this way, whilst most smaller developments are likely to continue delivering smaller units, the policy can help to ensure that larger sites meet the needs of a wider range of households.
B) Alternative Option: Retain the existing thresholds for site sizes to which the policy applies.	The existing policy applies to sites of 10 units as more in some locations and on sites as low as 4 units in other areas of the city. Despite the relatively low existing thresholds, the policy is only triggered for a very small number of planning applications per year (usually no more than 10 sites). It can also be difficult to achieve a specified mix, or indeed any mix in sizes of homes, on small, constrained infill sites.
C) Rejected Option: Lower the threshold at which a specified mix of unit sizes is required.	Currently the policy applies to sites of 10 units and above in the city and district centres, and has two thresholds of 4-9 and 10-24 units in other areas, so many sites in Oxford do not trigger the policy. However specifying a mix for sites any smaller is likely to significantly constrain design options and may not result in the best place making outcomes because most sites in Oxford are infill and very constrained, or are conversions existing buildings which are even more constrained.

Opt 18: Change of use from existing homes/loss of dwellings

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a criteria based policy that would be used in determining whether development proposals that would result in the net loss of existing homes would be acceptable.	<p>Given scale of the objectively assessed housing need in Oxford it will be important to ensure that the existing stock of homes is protected. This policy permits some flexibility to allow a loss where there are exceptional justifications; for example loss of a dwelling to alternative residential uses such as a care home or student accommodation. Community uses such as a conversion to a children's nursery or a small dentist practice, as well as small home-grown enterprises, also has potential to be converted back to a dwelling again.</p> <p>The priority for any loss of dwellings should be to replace with new residential (for example improved quality of accommodation, or greater number of units), followed by alternative residential uses, followed by community uses. Only if not possible would other options be justifiable in the context of loss of homes.</p>
B) Alternative Option: Include a policy to prevent the loss of self-contained homes to any other use unless at least 75m ² residential accommodation remains.	<p>Alongside trying to maximise delivery of new homes, it is also important to protect the existing housing stock, if Oxford is to address its housing need. Continuing this long-standing policy approach to resist the net loss of self-contained homes in Oxford and will help to protect the existing stock.</p> <p>This policy allows some flexibility to introduce small-scale community uses such as childcare provision and small shops, as long as the remaining residential accommodation is of a size which provides good quality residential amenity.</p>
C) Rejected Option: Allow the net loss of self-contained homes to any other use.	With such a high need for housing it is unlikely that any alternative use could justify loss of homes unless the residential units were of substandard quality. Even then the priority is likely to be to replace with new residential.

- 3.52 Houses in Multiple Occupation play an increasingly important role in meeting housing needs for Oxford residents. Traditionally they have helped to meet student housing needs, but increasingly they are being occupied by young professionals for whom private rental of individual homes or home ownership is unaffordable. If numbers are restricted then this cuts off an important supply of accommodation options for people, and either increases the number of people on the housing register or force more people to move outside of Oxford to find more affordable housing options. However, it is also important to consider how to manage the impact HMOs might have on communities, and to ensure HMOs are decent places to live.

Opt 19: Houses in Multiple Occupation (HMOs)

Policy approach	Consequences of approach/discussion
<p>A) Preferred option (Combination of A + B): Allow new purpose-built HMOs in appropriate locations, including employer-provided or staff accommodation.</p>	<p>Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly conflicts, because issues like car and cycle parking and bin storage would be fully addressed at the planning application stage and properly integrated into the design rather than existing buildings having to be adapted or retrofitted.</p> <p>Purpose-built HMOs in appropriate locations could also help to provide staff accommodation for key employers which have highlighted the issues with recruitment and retention resulting from affordability issues, for example nursing accommodation.</p> <p>Previously the city council has not been supportive of purpose-build HMOs favouring self-contained homes, however the unaffordability of homes in Oxford is now at such a level where self-contained homes on the private market are now out of reach of many people.</p> <p>It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs can be relatively easily.</p>
<p>B) Preferred option (Combination of A + B): Control how and where new HMOs are allowed by setting criteria to control how they are provided and managed and by restricting HMO numbers where there is already a high concentration of existing HMOs.</p>	<p>This option would slow down the increase in current 'hotspot' areas, such as in East Oxford, and encourage development of new HMOs to be spread across more areas of Oxford. This could take a very similar approach as the existing policy of preventing further 'over-concentration' of HMOs in areas where there are already significant numbers, which is usually based on no more than 20% of buildings in HMO use within a 200m length of street. This is also likely to result in continued conversion of family-sized homes to HMOs. Using tools other than the planning system (e.g. City Council licensing for HMOs) to manage HMOs would ensure they are safe and well managed. Planning policies can also ensure that adequate provision is made to address refuse storage/collection, and cycle and car parking, to avoid undue negative impacts on communities.</p>
<p>C) Rejected Option: Do not restrict numbers of new HMOs or introduce criteria to manage how they are provided.</p>	<p>This option would potentially exacerbate the potential undesirable impacts on neighbours of HMOs, such as parking. This is also likely to result in continued conversion of larger family-sized homes to HMOs.</p>

Providing accommodation for university students and other specialist housing needs

National Planning Policy says:

3.53 The NPPF says that local authorities should consider development needs other than simply housing and employment. It states that local planning authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community' (paragraph 50). The *Planning Practice Guidance* builds on this stating that: 'Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus... Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation.' However, national planning policy does not say that all students are required to be provided for in purpose-built student accommodation.

The Oxford story – background evidence and the Sustainability Appraisal:

- 3.54 The Cambridge Centre for Housing and Planning Research was commissioned by the City Council to look at demand and supply of student accommodation. The study includes a baseline analysis of the current structure of the student population, its current accommodation, and the future plans of the different educational institutions.
- 3.55 The study found that almost three quarters of University of Oxford students (14371) and just over half of Oxford Brookes students (5131) live in university/college maintained student accommodation or private halls. Just under half of Oxford Brookes University's students live in shared houses (4055, 3532 of which are undergraduates). 29% (4333) of the University of Oxford's students live in shared houses, 1585 of these students are undergraduates and 2748 are postgraduates.
- 3.56 The study looked at expected growth of the two universities, and this is anticipated to be between 1% and 2% per annum at Oxford Brookes, and at the University of Oxford: half to 1% per annum for undergrads and 2% for postgrads. If all students at the two Universities to 2026 were to be accommodated in purpose built student accommodation, this would require 13,467 student additional rooms. If no additional purpose built student accommodation is available to meet future growth, then by 2026 it is estimated that 754 additional existing houses would have to be converted into shared student accommodation to meet demand.
- 3.57 The study also found that 37% of all students in Oxford are at the various non-university institutions. The institutions that responded to the survey (55% of identified institutions) gave their maximum likely number of students they have on courses at any one time. This added up to 20,892 students, although not all these students will be in the city at the same time. It is estimated that around 11,500 students are on courses that last at least one academic year. It is estimated that about 5,586 students of other educational institutions require accommodation of some form. Of the institutions that responded to the survey, 6 were found to own or long-term lease purpose-built accommodation, with a total number of rooms of 530. A further 1,504 rooms in purpose-built student accommodation are short-leased to these institutions. This includes the use of University accommodation for summer school students during the holidays. Several institutions had plans to increase provision of purpose-built student accommodation. While some of this is off-site accommodation, much of it is within the institutions' main academic sites.
- 3.58 Another form of specialist housing is older person's accommodation. In 2016 the City Council undertook a review of older person's accommodation in Oxford. The review considered the current provision of sheltered and other housing options for older people aged 55+ in Oxford, alongside the competing needs. It found that there is a total of 1,483 units in the city; this is made up of 382 units of Category 1 (age 55+) accommodation; 877 units of Category 2 (sheltered) accommodation and 224 units in Extra Care schemes.
- 3.59 The review found that there is a range of sheltered and general needs accommodation provided in the city. It found that the demand and take-up appears to be relatively low, and the waiting list for extra care schemes is relatively short. The review states: "it would appear that the current level of supply in Oxford is generally meeting the current level of demand for this type of accommodation (that is extra care)." One recommendation of the review was that, given the rising life expectancy and quality of health

The study also found that 37% of all students in Oxford are at the various non-university institutions.

in older age groups, that the City Council should focus on accommodating provision of older people aged 75+ and those with significant health needs. This may require the allocations scheme to give preference to those over 75 instead of 55 or 60.

- 3.60 ORS were jointly commissioned to carry out the Cherwell, Oxford City, South Oxfordshire and Vale of White Horse Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017. This assesses current and future needs for Gypsy, Traveller and Travelling Showpeople accommodation in Cherwell, South Oxfordshire, Vale of White Horse and Oxford City. This used a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community. Because Oxford has no existing sites, there are therefore no waiting lists that can be used to demonstrate demand. Demand can also be measured by assessing whether there are members of the travelling community living in bricks and mortar. There was found to be one travelling household in bricks and mortar in Oxford, but they were considered to be having their needs met. The conclusion is that there is no current or forecast need for sites in Oxford.
- 3.61 The SA identifies a range of potential positive benefits related to the policy approaches on student accommodation and other specialist housing needs. Making specific policy provision for such needs will help with the sustainability objectives on vibrant communities, housing and education in particular. Focussing the provision of student accommodation to those on courses of a year or more would give access to Oxford's limited student housing supply to those receiving the greatest and longest term educational benefit; and prioritising students of the two universities would assist with the economic aims of the plan in supporting the universities.

Responses to first steps consultation:

- 3.62 Whilst it was broadly agreed that provision of new student halls can help to reduce pressure on the housing market, many respondents considered that there was already enough student accommodation and thought that housing for the elderly and for hospital staff should be a greater priority.
- 3.64 There was strong support for prioritising new student accommodation for the two Universities only, although also some objections. Top floors of science parks and out-of-town campuses were mentioned as potential locations for student accommodation.

Potential policy responses:

- 3.65 **Student accommodation**
Demand for student accommodation places pressure on the local housing stock, both from students accommodated directly in private rented housing, and also from student accommodation being developed on sites that may equally be suitable for other types of housing. High proportions of students may also result in perceived or actual harmful impacts on communities accommodating those students. Furthermore, the large numbers of foreign language students accommodated in the city during the spring and summer can impact on public transport and the city centre environment.
- 3.66 It seems appropriate that student accommodation should continue to be provided. However, aiming to accommodate all students in purpose-built student accommodation would conflict with the overall strategy and vision for Oxford, which is to balance different needs and particularly to maximise

There was strong support for prioritising new student accommodation for the two Universities only, although also some objections.

provision of general and affordable housing. Student housing that is either on an existing institution's site or tied to a higher or further education institution will help to support the Universities, while also balancing needs.

- 3.67 The accommodation needs of undergraduates, postgraduates and staff and those on work placements are all different and should be addressed individually.

Opt 20: Linking the delivery of new University academic facilities to the delivery of University provided residential accommodation

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Linking new or redeveloped university academic accommodation to the delivery of associated residential accommodation will support those institutions in meeting their own accommodation needs by demonstrating that they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements, such as teaching and nursing students and post-graduates on research-based courses). Set the threshold based on existing numbers, potentially reducing across the Plan period and varying between each university.</p>	<p>The threshold would be set to reflect a 2016 base of existing numbers of the types of students the policy would apply to who are living out currently, so start at around 1500 University of Oxford full-time undergraduate and taught course post-graduate degree students and 3500 Oxford Brookes full-time undergraduate and taught course post-graduate degree students. The policy would link to the provision of new University residential accommodation and could include a threshold that reduces over the plan period.</p> <p>Students on full-time taught courses at the two universities are likely to have similar accommodation needs, and similar impacts on the general housing market and on communities. Part-time students, students who are also training on work-placements such as teaching and nursing students, and students on research-based post-graduate courses who are also teaching are often playing a more active role in the city. They are also likely to have housing requirements that often will not be met by traditional university-provided accommodation, for example if they have a family or already live in the city. Amending the threshold, and the types of students included in the threshold, and tying new academic growth plan to the associated provision of University provided residential accommodation (to meet University and college needs) will better reflect the current needs of universities and students, and manage the impacts on the housing market. It is not the intention of the policy to prevent growth of the two universities, but to ensure it attempts to meet needs for student accommodation that its proposals create. Therefore, a policy based on realistic targets is a sensible approach.</p>
<p>B) Alternative Option: Continue to restrict new or redeveloped university academic accommodation unless the university in question can demonstrate that it has fewer than 3000 full-time students living outside of University provided accommodation.</p>	<p>The 3000 figure has been in policy for many years. The figure was designed to be an achievable target based on numbers of students living out at the time of the previous (2001-2016) Local Plan and Core Strategy. The number still broadly reflects numbers of students living out, which perhaps suggests the policy has been successful in ensuring stability. However, the policy does not reflect changes that have happened at each of the universities over recent years. There are now a broader range of students, with more part-time students, more post-graduate students, many of whom are also paid for teaching or research, and more students who spend time working out in hospitals for example. Many of these students will have different accommodation needs to full-time students on taught courses. Also, their impact on the community is different. Therefore, the policy approach should be altered to better reflect this.</p>
<p>C) Alternative Option: Continue with the existing policy approach but increase the threshold for Oxford Brookes for a set period of time to reflect current pressures. This approach would apply to all full-time students living in Oxford, so it would include teachers and nurses (unlike option a).</p>	<p>Oxford Brookes has recently increased its nursing students and has aspirations to increase their numbers further. Option A would exclude them from this policy restriction. This option would include them in the policy restriction, but the threshold would be increased from the current 3000 level in order to reflect Oxford Brookes's current position. It would then be lowered over time, to give the University the opportunity to provide for these additional students. This approach acknowledges that student nurses and teachers and others still have an impact on the housing market in the city, and puts the onus on the University to provide for them. It would reduce any current restrictions on them growing and improving their academic facilities, which may have some benefits to the economic and knowledge function of the city. However, this approach does not reflect well the current needs of universities and the changing nature of students</p>

	and their needs. It does not account for the fact that vocational students are often playing a more active role in the city and also have housing requirements that may not be met by traditional university-provided accommodation, for example if they have a family, if they already live in the city and if they will be spending time on placements.
D) Alternative Option: Continue with the existing approach but lower the threshold, for example so that 2000 students can live outside of university provided accommodation.	Reducing the threshold in a sudden policy change could be difficult for both universities to achieve, particularly Oxford Brookes. This would prevent Oxford Brookes from undertaking its planned improvements to its academic facilities, which are likely to be of benefit to the knowledge economy of the city. The provision of significantly more student housing that would be required in the short-term, before academic improvements could take place, would mean that sites would need to be made available for student accommodation, rather than for other uses such including general housing. The benefits in reducing students living out are likely to be outweighed by the negatives. Furthermore, there is no guarantee that there would be interest in a short-term growth in student halls places from students. This approach also does not alter the types of students included in the calculation, so does not reflect the changing needs of the universities.
E) Alternative Option: Do not include a policy restricting new or redeveloped academic facilities if there are more than a certain number of students living outside of university provided accommodation.	This option could allow expansion of the knowledge economy and provide more graduates to contribute to Oxford's workforce. However, it is likely to lead to more students living in private market dwellings, which will affect affordability and availability of general housing, with knock-on effects for businesses. It could also over-stretch transport provision and other services, as students will be less concentrated in particular locations.

Opt 21: New student accommodation

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + E): Focus development of new student accommodation only on allocated sites, existing campuses, in district centres and the city centre. (Sites will only be allocated for this use if they are considered to be in locations as listed, or on radial routes).	This would concentrate new purpose built student accommodation in specific areas, outside of existing communities and close to the academic facilities the students will need to access. Student accommodation is usually located on sites that would otherwise be suitable for housing; given the need to find more sites for housing in the city, limiting the sites for student accommodation would enable more sites to come forward for housing. However, this option may limit the potential for more students to be housed in purpose built accommodation.
B) Alternative Option: Continue with existing policy to allow new student accommodation only on allocated sites, existing campuses, radial routes, in district centres and the city centre.	This would ensure students are located near or in easy reach of facilities. It focuses purpose-built student accommodation in certain areas, helping to protect communities. This option reduces conflict between student accommodation and general residential use on sites. However it would enable more sites to come forward for student accommodation than the Preferred Option.
C) Alternative Option: Relax restrictions on the location of student accommodation by allowing new student accommodation in all locations.	This would mean student accommodation could be provided away from day-to-day services students need, increasing pressure on the transport system. It will also increase competition on sites between student accommodation and general housing. While delivery of student accommodation can release rented accommodation for housing, if it is allowed across the city it could affect delivery of general housing, and affect the make-up of existing communities.
D) Alternative Option: Do not allow new student accommodation (purpose built or conversions).	This option would mean students have to meet their housing needs in the private market, which would increase competition and therefore affect affordability. It would be likely to cause an intrusion of substantial numbers of students into residential communities, which will compromise their distinctiveness and promote animosity.
E) Preferred option (Combination of A + E): Ensure new speculatively built student accommodation is tied to	The University of Oxford and Oxford Brookes University are vital to the economic success of the city and as such the Local Plan sets a clear policy priority on supporting those two institutions. The student background study has shown that

<p>students of the University of Oxford and Oxford Brookes University only.</p>	<p>there is already significant amount of purpose built student accommodation occupied by students at educational institutions other than the universities. This compromises the ability of the universities to house their students, and leads to greater competition in the general housing market. This policy would be worded to ensure that new student accommodation (including that built by private speculative providers) would be limited in occupancy to one or both of the two universities.</p> <p>This option links directly to the option (in the economy chapter) to restrict the expansion of existing private colleges and language schools. This does restrict some institutions, but other forms of accommodation such as homestay or use of university accommodation outside of term time will be available. Restriction of institutions which are often less well-established in the city is not necessarily a negative in a city with so many competing demands.</p>
<p>F) Alternative Option: Continue with the existing policy approach to restrict new purpose built student accommodation to those on courses of a year or more.</p>	<p>This option could be seen as more equitable than the preferred option, as it allows greater access to purpose built student accommodation for students from a wider range of academic institutions. However, in a city such as Oxford where land is such a scarce resource with so many competing demands, decisions must be made about how to balance and prioritise these competing demands. The universities are essential to Oxford and to its economy. They do have an impact on the housing market. Of the institutions that responded to survey, 6 were found to own or long-term lease purpose-built accommodation, with a total number of rooms of 530. A further 1,504 rooms in purpose-built student accommodation are short-leased to these institutions. If their academic expansion is to be restricted unless they can provide enough student accommodation then it is sensible that new purpose-built accommodation is available solely to the two universities. Other students will still be able to study in Oxford, using homestays and existing accommodation and accommodation on institutions' existing sites, but their competition with other demands on land and housing will be minimised.</p>
<p>G) Rejected Option: Do not have restrictions on the occupiers of new student accommodation allowing students of the universities as well as language schools and university preparation colleges to occupy the accommodation.</p>	<p>This policy could support a wide range of institutions in Oxford. However, it would lead to very significant competition for speculatively built new student accommodation. It would severely limit the potential for the universities to house more students in this kind of accommodation. In a city such as Oxford where land is such a limited resource this will have negative impacts on availability and affordability of housing for the general population. Because of their economic importance to Oxford and the value of their human capital to Oxford, and because of the other potential ways to house students at other educational establishments (in the family home, in homestays, in accommodation on institutions' own sites etc.) the needs of the two universities should be prioritised over other educational establishments in this plan.</p>

3.68 Other specialist housing needs

Travelling communities, older people and boat dwellers may all have particular accommodation needs and should be considered. Options for providing for these groups are explored in this section. Options for accessible and adaptable homes may also be relevant to these groups and these are explored in the section below: Ensuring a Good Quality Living Environment.

Opt 22: Older persons accommodation

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Include a policy that is generally supportive of older persons accommodation integrated as part of developing mixed and balanced communities.</p>	<p>Although Oxford has generally a younger than average population, there is still expected to be a growth in the elderly population, with the largest growth in the 75+ age range. Oxford is already well provided for in terms of extra-care housing, and it is not anticipated there will be an additional need for sites. However, there are many types of older persons accommodation. Providing suitable facilities that could encourage people to downsize, as part of mixed</p>

	and balanced communities could be of benefit to the housing market overall. The risk would be if elderly persons accommodation was to be provided to an extent it is completely at the exclusion of general market housing. Older persons accommodation would be required to comply with the affordable housing policies in the Plan.
B) Alternative Option: Require older persons accommodation on particular sites if need has been identified for provision on that site.	At present no site in Oxford has been suggested as having a need for older persons accommodation that would require a specific site allocation policy.
C) Rejected Option: Require a proportion of older persons accommodation on all sites over a certain size.	Given the lack of current and projected need in Oxford, especially if measures are taken to manage demand such as changing the allocations policy to give preference to those over 75 instead of 55, this approach seems unnecessarily onerous and of limited benefit and could sterilise a part of a site.
D) Rejected Option: Do not include a policy on older persons accommodation.	Older persons accommodation is expected to become increasingly important with the growth in numbers of older people expected in Oxford, especially those 75+ (even if the proportion is not expected to grow as much as most other areas). There is therefore likely to be demand for older persons accommodation, even if it is private provision, rather than sheltered and extra care facilities. This accommodation could bring potential benefits to people's health and wellbeing, as well as freeing up other housing stock. Therefore, it seems sensible to include a policy relating to this issue.

Opt 23: Accommodation for travelling communities

Policy approach	Consequences of approach/discussion
A) Preferred option: Seek to meet identified need by working with adjoining areas. Allocate any suitable sites identified and set out criteria of suitability.	This approach is NPPF compliant and attempts to identify needs, address any needs in the most appropriate way and also to ensure any proposals are assessed for suitability. A joint study with other Oxfordshire districts has been undertaken, and this has suggested no needs for any sites in Oxford. However, it is considered that criteria for assessing suitability of sites for travelling communities could usefully be included in the Local Plan, in case any sites are proposed during the Plan period.
B) Alternative Option: Do not include a policy on travelling communities.	This means that needs might not be addressed, and also increases the risk of unallocated sites coming forward in unsuitable locations.

Opt 24: Homes for Boat Dwellers

Policy approach	Consequences of approach/discussion
A) Preferred option: Assess need for residential boat moorings and include a criteria based policy for determining planning applications for residential moorings, covering access for emergency services and an assessment of the availability and distance between facilities.	The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 will be updated to assess the need for residential moorings. However, it is not expected that, if a need is identified, it will be possible to fully meet that need because of limited capacity. The proposed approach ensures that where proposals come forward they can be properly assessed. Other issues that will need to be considered in addition to the need for moorings are an assessment of the availability and distance between facilities such as water taps, rubbish disposal, chemical toilet disposal and fuel pumps; and access to 'off-side' moorings – i.e. those not on a tow path.
B) Alternative Option: Seek to meet need for residential moorings by allocating sites.	Further clarity is expected from the Government on the definition of 'boat dwellers' and 'houseboats' that should be included in any assessment of gypsy and traveller needs; until that is released, boat dwellers are not included in the assessment. If need is assessed once there is clarity on the definition, it still cannot be assumed that all need can be met through the provision of permanent moorings as many boat dwellers do not seek permanent moorings and navigate waterways on a permanent basis. Furthermore, most areas in Oxford with potential for residential moorings already have moorings, so the potential for further sites is limited.

C) Rejected Option: Do not include a policy on residential moorings.

This approach would mean that there is no specific planning policy basis through which to assess planning applications for residential moorings which would result in a lack of clarity and consistency of approach.

Ensuring a good quality living environment

National Planning Policy says:

- 3.69 The NPPF is clear that local planning authorities should promote and demand high quality and inclusive design in all developments, including individual buildings and public and private space (paragraph 58). Planning policies and decisions should aim to ensure that developments will add to the overall quality of the area, not just for the short term but over the lifetime of the development. Policies should optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) (paragraph 58). Older people and people with disabilities are also identified as some of the groups that have specific housing needs that should be planned for (paragraph 50).
- 3.70 The government introduced a new set of optional technical housing standards in March 2015, which can be adopted as policy within the local plan. These include standards for indoor space, and for accessibility and adaptability.

The Oxford story – background evidence and the Sustainability Appraisal:

- 3.71 Oxford has a huge housing need, and a shortage of available land on which to build new homes. New homes should be of an adequate size and layout so that they are high quality, functional and meet the needs of a wide range of people, and take in to account how those needs might change over time. This should apply to development at all scales, from large strategic sites down to infill development, which represents an important contribution to meeting Oxford's housing need. On any scale of development, ensuring housing is built with adequate privacy, daylight and space (internal and external) helps to ensure the wellbeing of residents.
- 3.72 It is important to consider the demands and requirements people will have from their homes, and how these will change over the plan period. In particular, addressing how homes can be made adaptable to the changing needs of their inhabitants will be an important consideration. These changes include adaptations in the size and composition of households, the potential for adult children and older parents moving back in to the family home, and an ageing population.
- 3.73 In 2013, the City Council adopted the Sites and Housing Plan. This included policy HP12 – Indoor Space, which set minimum standards for the internal space required in new flats and houses. With the introduction of the new optional technical standards in March 2015, where a Local Plan already included internal space standards, these were to be interpreted by reference to the equivalent new national technical standard; local authorities could only require compliance with the new standard where there was an existing space standard policy. The new nationally described space standard was adopted and guidance for applying them was set out in *Planning Technical Advice Note: 1A – Space Standards for Residential Development* (2016).

New homes should be of an adequate size and layout so that they are high quality, functional and meet the needs of a wide range of people...

- 3.74 Oxford City Council's *Review of Older Persons Accommodation* (2016) identifies that there is good range of sheltered and designated 55+ accommodation in Oxford, and even potentially an over-provision. However, there is a recognised demand for housing that enables older people to maintain their independence for longer, so building homes that have the potential to be adapted into accessible homes will help to meet this demand. In addition, there are around 18,000 people (12.4% of the population) in Oxford with long a term health problem or disability. Some of those will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them.
- 3.75 The SA highlighted how including a suite of policies on living standards (including space standards, privacy and accessibility for example) would have significant positive impacts on a number of sustainability objectives including housing, vibrant communities, Human health and poverty, social exclusion and inequality. The SA identified potential risks that could result from relying on national policies alone and on not embedding the optional national housing standards in the Local Plan.

Quantity must be balanced with quality, and the need to deliver homes must not result in poor quality homes...

Responses to first steps consultation:

- 3.76 Concerns that emerged from the first steps consultation refer to the importance of properly considered waste management; the importance of the size and type of amenity space provided in new developments; and the standards of size and layout for housing. There were comments on the importance, particularly to families, of green spaces within developments, and that the functionality of amenity space is an essential consideration. Whilst some respondents remarked that houses were being built too small, others commented that design and space standards should be more flexible and a number suggested innovative housing options should be considered, including 'capsule' apartment blocks or dormitories for young professionals and short-term visitors, shared building and smaller units.

Potential policy responses:

- 3.77 **Standards for housing and amenity space – quality living accommodation**
Quantity must be balanced with quality, and the need to deliver homes must not result in poor quality homes that do not provide adequate living conditions. Indeed the pressure to delivery more homes in a way that makes efficient use of land, means that policy standards to ensure decent living spaces will be particularly important. In order for the delivery of homes to meet the national aim of sustainable development, these homes must be built and designed in such a way that they remain useful for a significant period of time; they must be adaptable to the changing requirements and demographic of residents, and not become obsolete. Policies need to ensure that these high standards of living environment and adaptability are delivered, whilst also providing scope for innovative design and solutions.

Opt 25: Privacy and daylight

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Continue with current policy to ensure new residential development provides good privacy and daylight for the occupants of existing and new homes, setting out the factors that will be considered and including the 45 degree guidelines.</p>	<p>This would ensure new development provides adequate daylight and privacy, and does not reduce privacy and daylight in existing development to an unacceptable level. Including the 45 degree guidelines give developers a clear method of assessing this, and set out a transparent approach, but will also leave scope for developers to use other methods to demonstrate that dwellings will receive adequate daylight. The policy could address privacy issues that might emerge in the context of mixed use development.</p>

<p>B) Alternative Option: Continue to require reasonable privacy and daylight, but do not include the 45 degree guidelines or list other details in the criteria.</p>	<p>This could ensure that new development provides adequate daylight and privacy, and does not reduce daylight and privacy in existing development to an unacceptable level. The 45 degree guidelines are well-established; removing them would reduce transparency, and would remove a tool that is useful in assessing daylight.</p>
<p>C) Rejected Option: Do not include a policy on privacy and daylight.</p>	<p>Having no policy means there is more flexibility for design to reflect location and other factors, but this could lead to new development that does not have sufficient daylight or privacy for its occupants, or reduces daylight or privacy to surrounding houses to an unacceptable level.</p>

Opt 26: Housing internal space standards

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Use the nationally described space standards as the basis for a policy.</p>	<p>The government introduced a nationally described space standard in March 2015. The nationally described space standard replaces existing spaces standards used by local authorities; local authorities now have the option to adopt the nationally described space standards, or have no space standard at all. The space standard can only be applied where there is a local plan policy based on evidenced local need and where the viability of development is not compromised.</p> <p>In summary, the minimum standards include (among others):</p> <ul style="list-style-type: none"> • 1 bedroom flat: 39m² (single bedspace/person) and 50m² for a 2 bedspace, one bedroom home • 2 bedroom (2 storey) home: 58m² (70m² (3 bed spaces) and 79m² (4 bed spaces) • 3 bedroom flat: 74m² (4 bed spaces) and 95m² (6 bed spaces). <p>This should ensure that new developments are designed and built to provide adequate space for occupants. It will be important to ensure that designs maximise the useable space within housing, through functional layout, and provide scope to adapt and modify housing to meet future requirements. The demand for housing in Oxford means that a proportion of larger and family homes will be provided in the form of flats or apartments; ensuring adequate space and quality environments will play a crucial role in changing the perception of apartments and their suitability as family homes.</p>
<p>B) Alternative Option: Do not include a policy on internal space standards.</p>	<p>England currently builds the smallest houses in Europe, on average. Existing policies in Oxford are on the whole less generous than the new national standards (however the Oxford standards are more simple than the new national standards). The increasing pressure to deliver homes, especially in Oxford, where there is a great deal of pressure on a small amount of available land may be justification to consider properties that are less generous than the national space standards. However this could result in housing that is unacceptable in terms of internal space and doesn't offer occupiers the appropriate level of space.</p>

Opt 27: Outdoor space standards

Policy approach	Consequences of approach/discussion
<p>A) Preferred option (Combination of A + B): Require a certain size of outdoor amenity space, and specify requirements for quality in new developments.</p>	<p>This would ensure that outdoor amenity space provided as part of new development was useable and pleasant for the residents. It would be an enhancement to the development, and to the area surrounding the development. It would provide benefit to health and wellbeing of residents. Specifying quality requirements could deliver the greatest resilience to climate change, and minimise flood risk through increased surface water run-off, if requirements specify permeable surfaces and resilient species of tree, for example. This could have benefit to biodiversity. The quality requirements could be specified in the 'Landscape associated with building' policy in 'Creating quality new development'.</p>

<p>B) Preferred option (Combination of A + B): Allow part of the required outdoor amenity space in new developments to be met through provision of shared amenity space.</p>	<p>This could enable more useable outdoor amenity space to be delivered. A larger, shared outdoor space with high quality landscaping, and which receives direct sunlight, may be more useful and beneficial than a small, private balcony, for example. A possible approach could be for this to be combined with option a: shared space could meet the requirement for smaller dwellings, while private outdoor amenity space could be a requirement for dwellings over a certain size. Providing private outdoor space may be more important for larger family units, whilst shared space may be suitable for 1-bed units.</p>
<p>C) Rejected Option: Do not include a policy requiring outdoor amenity space in new developments.</p>	<p>This could result in new development being delivered which does not contain any outdoor amenity space, which would have a negative impact on flooding, biodiversity and the health and wellbeing of residents.</p>

Opt 28: Accessible and adaptable homes

Policy approach	Consequences of approach/discussion
<p>A) Preferred option: Have a policy to implement the “optional technical standards” on accessible homes available through Building Control.</p>	<p>The government introduced an optional Building Regulation requirement in ‘Approved Document M: access to and use of buildings’ in March. Previously, the Lifetime Homes Standard could be adopted into policy through Local Plans. This standard has now been replaced by the optional building regulation; local authorities can adopt a policy to provide enhanced accessibility or adaptability through Requirement M4 (2) Accessible and adaptable dwellings and/or M4 (3) Wheelchair user dwellings. The optional regulations can only be applied where there is a local plan policy based on evidenced local need and where the viability of development is not compromised.</p> <p>In summary the M4 (2) Accessible and adaptable dwellings requirements includes the following:</p> <ul style="list-style-type: none"> • Level access (including to outdoor space) • Ground floor WC (with potential for shower) • Features for future adaptation • Wall mounted sockets and switches at above a specified height • Doorways and corridors of a specified width to accommodate wheelchairs <p>The M4 (3) Wheelchair user dwellings requirements includes the following:</p> <ul style="list-style-type: none"> • Level access (including to outdoor space) • Ground floor WC • Doorways and corridors of a specified width to accommodate wheelchairs • Wheelchair storage and transfer space • Lift (or space allocated for potential for lift) • Kitchen layout to accommodate wheelchair user • At least 1 double bedroom on ground floor close to WC, with turning space, ceiling height to accommodate potential hoist • Accessible bathroom • Wall mounted sockets and switches at above a specified height <p>While the Scoping Report suggests there is good provision of sheltered accommodation for older people, there is not a great deal of choice or flexibility for residents who require accessible housing but who live independently, particularly in the private market. Ensuring that new housing is designed in such a way that it can be adapted to be made accessible will help to provide this choice and flexibility. It will also address the changing requirements of residents over the plan period, as it is projected that Oxford will have a greater proportion of older residents making up its population, and providing opportunities for residents to maintain their independence is very important and can considerably alleviate pressure on health and social care. Ensuring all new homes are adaptable is also a more efficient use of resources, and more sustainable, as a home that is adaptable will have a longer functional life.</p>
<p>B) Alternative Option: Do not include a policy on accessible and adaptable homes.</p>	<p>This could result in homes being built that are not sufficiently adaptable to the changing requirements of residents. This would be an unsustainable approach to building new homes, as they would not be suitable for their residents as their needs change.</p>