Oxford City Council

Housing and Economic Land Availability Assessment (HELAA)

Interim Report

September 2022

Oxford City Council

Abbreviations used in this report

Abbreviations	Meaning
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
HELAA	Housing and Economic Land Availability Assessment
HMO	Houses in Multiple Occupation
DLUHC	Department for Levelling up, Housing and Communities
ELA	Employment Land Assessment
OCWS	Oxford City Wildlife Sites
SAC	Special Areas of Conservation
SSSI	Sites of Special Scientific Interest
SME	Small and Medium-Sized Enterprises
SPD	Supplementary Planning Documents
CIL	Community Infrastructure Levy
PDL	Previously Developed Land
SuDS	Sustainable Drainage Systems
FZ	Flood Zone

EXECUTIVE SUMMARY

Oxford City Council is preparing a new Local Plan 2040 (OLP 2040), which will provide a framework for future development across the city. The HELAA was last updated to March 2019 to support the Local Plan 2036 examination which took place at the end of that year. This current interim update to support the OLP 2040 brings the base date to 2020 and updates the completions data to March 2022.

The HELAA does not allocate land for residential development. It simply identifies sites with development potential. It lists and maps land which is considered to be deliverable during the plan period 2020-2040. The decision regarding where housing and economic uses should be built in the future will be made through the policies in the OLP 2040 (including Sustainability Appraisal), and through the planning application process when judging planning applications.

The interim HELAA has followed the methodology set out in the Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment and has been produced to align with the Oxfordshire Joint HELAA methodology ("the Joint Methodology")[1] . This joint methodology was collectively prepared by the city and four district councils in Oxfordshire, working in partnership with Oxfordshire County Council. In the past, each council has devised their own methodology for producing HELAAs. Whilst the methodologies are similar (due to each reflecting national planning guidance), there are variations in the approaches applied. The joint HELAA methodology therefore enables all Oxfordshire councils to use the same approach and assumptions, resulting in a more consistent picture of land availability across the Oxfordshire housing market area and functional economic market area. However, paragraph 1.4 of the Oxfordshire Joint HELAA Methodology does state that it may be appropriate to retain some variation in approaches to ensure a thorough and robust process and to take account of local circumstances. It acknowledges that there may be instances where a slightly different approach is appropriate for the urban authority of Oxford City, where land availability is more constrained, compared to the more rural Oxfordshire authorities. The HELAA methodology for Oxford City therefore follows the guidance in the joint methodology but also reflects the local circumstances that are pertinent to Oxford.

The HELAA considers sites with potential for housing (including student accommodation) over 0.25 ha (or capable of delivering 10+ dwellings), and economic uses over 500 square metres. The PPG ("the Guidance") suggests that economic land uses include retail, leisure, cultural, office and warehousing, etc[2] . The joint HEELA methodology states that for the purposes of undertaking HELAAs in Oxfordshire, economic uses will be defined as development falling within the following Use Classes:

- Use Class B2 (industrial)/Use Class B8 (storage or distribution)
- Use Class E (commercial, business and service uses)

Therefore this interim update to the HELAA follows the joint methodology, and future iterations may incorporate additional types of economic development, once the OLP2040 and its evidence base is further progressed.

1 completed November 2021

2 Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 012 Reference ID: 3-012-20190722

The assessment includes sites from the following sources:

a) Previous housing land availability assessments which have been updated to reflect the latest position up to 31.03.2022;
b) new sites that have been added from Call for Sites and Local Plan consultations;
c) planning permissions and planning applications;
d) other officer identified sites.

The HELAA also follows the methodology set out in the Guidance on how sites should be assessed. This includes an assessment of whether each site is suitable, available and achievable (viable) for development. Sites that are expected to come forward in the first five years of the plan period are classed as 'deliverable'; sites that are expected to come forward in the later periods (years 6-10, 11-15, 16-20 and beyond) are classed as 'developable'. Sites with development potential over the plan period are given a development potential figure (the capacity of the site for development).

The final capacity figure for housing and economic uses represents net additional dwellings and floorspace to the existing housing and employment supply. The HELAA is also informed by an interim Employment Land Assessment (2022), which assesses the existing employment land supply against demand projections and recommends which sites, if any, are suitable for release from employment use for other uses.

Each site included in the assessment is shown on a map in Maps 1-3. Sites that have been assessed as having development potential are shown on Maps 4-6.

Appendix A is the detailed site assessment table. Capacity figures and expected timescales for sites assessed as deliverable/developable are set out in Appendix B.

The HELAA figures provide a snapshot in time representing the situation under the current national policy approach, and the current information available about site constraints, landowner intentions and site viability. This interim HELAA update reflects the latest position on sites to March 2022, reflecting new sites becoming available and other sites being completed.

1 INTRODUCTION

1.1 Background

1.1.1 Oxford City Council's Local Plan was adopted in June 2020 and provides a framework for future development which will cover the period to 2036.

1.1.2 The HELAA assesses various sources of sites for opportunities for net additional housing or economic use, either through reuse or intensification of existing brownfield land, or through development on unoccupied land, including greenfield land.

1.1.3 An Employment Land Assessment has considered the balance between the demand for employment land and the existing employment land supply. The interim findings of the ELA have been used to inform the HELAA site assessments, in particular when judging whether a particular site is suitable for release from employment use.

1.1.4 There are some key points that should be acknowledged with reference to this document:

- The HELAA does not allocate land for residential development. It simply identifies sites with development potential. It lists and maps land which is considered to be available during the plan period, and may be potentially suitable in so far as they are not constrained by specific factors. The decision regarding where housing and economic uses should be built in the future will be made through Local Plans (including Sustainability Appraisal), and through the planning application process when judging planning applications;
- Inclusion of a site in the HELAA does not indicate that the use of the land for residential or economic uses is necessarily supported by the council or that it would be granted planning permission for such uses, or be taken forward in policies;
- Similarly, the inclusion of a site within the HELAA assessment does not preclude the site being developed for other uses; and
- The HELAA is based on the information available (supplied and researched) at the time. It is, in effect, a 'snapshot' of the capacity at that point. Therefore the assessment and conclusions about sites may be subject to change over time, for example site boundary changes, constraints may be overcome/mitigated or additional constraints identified, likely development timescales may change, and site capacity or densities may change.

1.1.5 The HELAA provides background evidence on the potential availability of land in Oxford for housing and economic uses and the choices available for delivering sites. The HELAA is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for housing or economic development.

1.2 Planning Policy Context

1.2.1 The National Planning Policy Framework (NPPF) sets out the requirement for every Local Planning Authority to produce an assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing and economic uses over the plan period[3]. This HELAA fulfills

[3] DLUHC (2021) National Planning Policy Framework, para 68 and 82

the requirements as set out in NPPF and associated Planning Practice Guidance[4] for the assessment, namely to:

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

1.2.2 The most up to date guidance for the preparation of HELAA is provided Guidance as at April 2022. The Guidance sets out a proposed methodology, breaking the process down into 5 stages with detail about what is expected in each stage.

[4] Planning Practice Guidance: Housing and Economic Land Availability Assessment,Paragraph: 001 Reference ID: 3-001-20190722

1.3 Land uses included in the assessment

1.3.1 The HELAA has assessed sites of over 0.25ha (or capable of delivering 10+ dwellings) or economic uses over 500 square metres (sq m). The NPPF suggests sites over 5 dwellings are included, however due to the large number of small sites in the city, many of which are infill developments or conversions that are hard to identify much in advance, sites of 1-9 were considered better dealt with through a windfall calculation and only sites over 10+ or 0.25ha have been included in Appendices A and B. This differentiation in approach within Oxford is also referred to in the Oxfordshire Joint HELAA Methodology[5] .

1.3.2 A proportion of the sites assessed in the HELAA are sites that are already in the planning process, either planning permissions, sites at the pre-application stage or sites that are being actively promoted by landowners.

1.3.3 The land use categories in the HELAA are set out below.

Housing

General housing

1.3.4 The Government's definition of a dwelling is defined as a self-contained unit of accommodation[6]. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. Non-self-contained household spaces at the same address should be counted together as a single dwelling. Therefore a dwelling can consist of one self-contained household space, or two or more non-self-contained household spaces at the same address such as an HMO.

1.3.5 The HELAA will assess the capacity of sites to deliver self-contained units of accommodation. These could be in the form of flats or houses.

Student accommodation

1.3.6 The Guidance indicates that student accommodation can be counted in the housing land supply figure. It states "All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle contribute to an authority's housing land supply"[7]. This is based on the amount of accommodation that new student housing releases back to the wider housing market and the extent to which it allows general housing to remain in such use.

1.3.7 Up until the 2019 update, previous HELAA assessments had taken the average number of students per house as 5 because, given the nature of student

5 Oxfordshire Joint HELAA Methodology (November 2021): Table below Para 3.15

6 A to Z - Housing statistics and English Housing Survey glossary - Guidance - GOV.UK (www.gov.uk)

7 Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 035 Reference ID: 68-035-20190722

accommodation in Oxford and occupancy rates of HMOS, it was considered reasonable to assume that developing five student rooms would release the equivalent of one dwelling in the housing market. However, since then the City Council has reconsidered its approach due to the introduction by the Government of the Housing Delivery Test. Guidance for the Housing Delivery Test[8] states that the Government will apply the national ratio of 2.5 to estimate the number of net dwellings that would be freed up from the net additional student communal bedspaces. The capacity figure arrived at in the HELAA informs the Local Plan policy and will become the City Council's housing target. Whether this target is met will be assessed using the methodology of the Housing Delivery Test. Therefore, it is important that the methodology used to calculate housing capacity matches the methodology that will be used in the Housing Delivery Test, so the 2.5 ratio is now used in this HELAA.

Residential care homes

1.3.8 In 2015 the Guidance introduced the requirement that residential care homes should be counted in the housing land supply figure. The City Council has always counted housing for the elderly in its land supply if it consists of self-contained dwellings. The Guidance widens this to include potentially non-self-contained rooms in C2 accommodation.

1.3.9 Up until the 2019 update, the approach taken in previous HELAAs was to assume that one room in a C2 care home would on average release one dwelling in the housing market. However, the Housing Delivery Test sets the national ratio for communal bedspaces other than student accommodation at 1.8, which is the ratio that has been applied since the 2019 HELAA.

Economic sites

1.3.10 The HELAA includes an assessment of all land within Oxford City Council boundary with potential for economic use. This is a requirement of the Planning Practice Guidance and is intended to ensure that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use.

1.3.11 Opportunities for economic uses included in the HELAA include sites currently in use for employment use (B2 and B8) and commercial, business and service uses (Use Class E) including community, leisure, culture and other town centre uses including the larger shopping centres (small individual retail units have not been all assessed - unless submitted by landowners - because they are likely to be in separate land ownerships and individually would not meet the site threshold, thus it would not be a proportionate approach).

The types of sites / uses considered in the HELAA include:

Office / Business Use

[8] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779782/HDT_technical_note.pdf

1.3.12 This category includes any land with potential for net additional office space, including Class E. This includes opportunities within the existing business and science parks as well as new office space proposed as part of new mixed-use schemes on strategic sites, in particular to facilitate the growth of the high tech, knowledge intensive sector.

Industrial Use

1.3.13 Industrial use includes the B2 (General Industry) and B8 (Storage and Distribution) land uses. Sites included in the HELAA include any opportunities identified for net additional employment land through reuse or intensification of land and proposals for industrial use as part of new development.

Other uses

1.3.14 Other economic uses included in the assessment including those in Class E (Commercial, Business and Service) and Class F (Local Community and Learning) are any net additional land identified for community, leisure, culture, tourism and other town centre uses (excluding retail) as described by the Guidance.

1.4 Relationship with the Employment Land Assessment (interim 2022 report)

1.4.1 The interim HELAA update has been carried out in parallel with an interim update to the Employment Land Assessment (ELA) for Oxford City. An up-to-date assessment of employment land is important to ensure there is an understanding of, and evidence for, the total stock of employment land to compare against future demand.

1.4.2 The HELAA has taken into account the findings of the interim ELA to inform the HELAA site assessments, for example updated information about landowner intentions, site capacities, and density assumptions to reflect the latest market trends.

2 HELAA METHODOLOGY

2.0.0 This chapter sets out the methodology and key assumptions applied in the assessment.

2.0.1 The Guidance sets out a suggested methodology for carrying out a HELAA[9] . This section sets out how the Government Guidance has been interpreted and applied to the Oxford context, also taking into account the Oxfordshire Joint Methodology. The assumptions applied in the 2019 HELAA have been reviewed, and where applicable updated.

[9] Paragraph: 005 Reference ID: 3-005-20190722

2.1 STAGE 1: IDENTIFICATION OF SITES/BROAD LOCATIONS TO BE ASSESSED

Determining the Assessment Area

2.1.1 The starting point for determining the assessment area is the Oxford City Council administrative boundary. A further Call for Sites was undertaken in 2021 to search for sites, and desktop sources of sites have also been reviewed due to the highly constrained nature of Oxford's land supply (in accordance with the Joint Methodology).

Site size threshold

2.1.2 A site size threshold of 0.25ha (or smaller sites if they are capable of accommodating 10+ units) has been applied for residential sites. Sites smaller than this will be taken into account in the windfall allowance calculation, unless there is evidence to demonstrate that they can deliver a net gain of 10+ units, such as a planning permission. This is considered to be thorough but proportionate, to reflect the nature of typical sites in Oxford and that so many are small infill or conversion sites that come forward as windfall and are typically not promoted by landowners in advance. This is also consistent with the Joint Methodology. The site size threshold for economic uses is 0.25 ha or 500 m^2 of floorspace which is in line with the guidance.

Any sites which have been removed from Table A due to not meeting the site size threshold are listed in Appendix E.

Land types included or excluded in the HELAA

2.1.3 This section explains why different types of land are included or excluded from the HELAA. Within the Oxford City boundary there are some clear intrinsic designations where development (housing or employment) would be unsuitable, as these areas are entirely excluded from the area of search. Therefore excluded from the assessment were areas in undeveloped Flood Zone 3b, the SAC, SSSIs and Town Greens. Included were all other brownfield or greenfield sites, including Green Belt, open air sports facilities, green infrastructure corridors, Local Wildlife Sites, and Oxford City Wildlife Sites and Oxford City Wildlife Corridors which are included on the basis that as part of the evidence base for the adopted Local Plan, the biodiversity value of these sites has been reassessed. This is as per the approach taken in the 2019 SHLAA update

2.1.4 It should be noted that if individual sites were identified through being an existing allocation or through a suggestion for inclusion by consultees, then the site was included even if it is also in an excluded designation. This is to ensure transparency of process.

Table 1: Summary of land types included or excluded from assessment

Land type / designation	Conclusion
Flood Zones 1, 2 and 3a (greenfield or brownfield) Flood Zone 3b if previously-developed land (PDL)	Included in assessment area

Flood Zone 3b (greenfield)	Excluded from assessment area
Special Area of Conservation (European designation)	Excluded from assessment area
Sites of Special Scientific Interest (National designation)	Excluded from assessment area
Green and Blue Infrastructure Network	Included in assessment area
Green Belt	Included in assessment area
Outdoor Sports	Included in assessment area
Allotments	Included in assessment area
Town Greens	Excluded from assessment area
Employment sites Category 1,2,3	Included in assessment area
Other brownfield land	Included in assessment area
Other greenfield land	Included in assessment area

Flood Zones

2.1.5 Flood Zone designations are intrinsic designations and clear national guidance, in the form of the NPPF and PPG, exists on what should and should not be developed in them. Dwellings are classed as a 'more vulnerable use' and are allowed in Flood Zones 1 and 2. Dwellings are only allowed in Flood Zone 3a if a Sequential and an Exception Test is passed. Vulnerable development is not permitted in Flood Zone 3b according to the NPPF. Economic uses such as office and industrial is classed as 'less vulnerable' but is still not considered suitable in 3b according to the NPPF.

2.1.6 Oxford has large areas of land which are at risk of flooding. However, there are not enough sites in Flood Zone 1 and 2 to meet identified needs, so a bespoke approach has been developed in partnership with the Environment Agency in order to be pragmatic about making best use of sites in Oxford and wider sustainability objectives and to avoid sterilizing sites from modernisation or other redevelopment which could help make them more sustainable. This approach was endorsed by the Inspector at the Local Plan Examination.

2.1.7 The approach sets out that sites within Flood Zone 3 will be considered suitable for development subject to very specific criteria. In some areas of Oxford a lot of development already exists in areas at the highest risk of flooding. This is generally older development that won't be designed with modern technology and won't incorporate features such as Sustainable Drainage Systems (SuDS) that minimise the impacts of flooding on both the existing properties and elsewhere. The NPPF allows only water-compatible uses and essential infrastructure in Flood Zone 3b. This prevents reuse of existing buildings in areas

of Oxford at highest risk of flooding. The approach of the Local Plan policy is to allow very careful re-development of existing brownfield sites in Flood Zone 3b. This is to make best use of existing sites in the generally sustainable location of Oxford and also because new development has the potential to improve the flood risk situation. The policy sets out conditions for development in Flood Zone 3b that will ensure the flood risk situation is improved. Conditions include that the overall built footprint is not increased and that flood storage is not lost. Previously developed sites in Flood Zone 3b have not, therefore, been excluded from consideration in the HELAA.

2.1.8 The Environment Agency has also set out guidance as to how sites should be assessed which are currently within Flood Zone 3 but which in future will benefit from the construction of flood defences. This is particularly relevant to the western part of the city where a new 'western conveyance channel' flood alleviation scheme is proposed (Oxford Flood Alleviation Scheme 'OFAS). The advice is that flood alleviation measures are designed to reduce fluvial flood risk to benefit existing properties and infrastructure in the City, rather than to open up areas of the city for future housing development.

Summary: sites in Flood Zones 1, 2, 3a are included in assessment, also Flood Zone 3b if brownfield. Only Flood Zone 3b greenfield sites are excluded unless specifically identified through call for sites or consultation.

Nature Conservation Designations

2.1.9 Consistent with the NPPF para 174 and 179, the Oxford Local Plan 2036 Policy G2 seeks to protect sites with biodiversity value and ecological value from development. This includes the Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Oxford City Wildlife Sites, Local Wildlife Sites and Green and Blue Infrastructure Network. It also makes a distinction between the protection level of higher (international and national) designations and lower (local) designations, in terms of development occurring near to designated sites.

2.1.10 There is a case to be made that because the Local Plan approach is entirely consistent with the NPPF then all nature conservation designations should be excluded from the assessment area. However, for the purposes of this assessment, only the sites protected by statutory national or international designations (SSSI and SAC) have been excluded. To ensure a thorough assessment, local wildlife sites and green and blue infrastructure network have been included within the assessment despite the importance drawn to wildlife corridors in the NPPF. When sites which adjoin or are nearby to nature conservation sites are assessed in Stage 2, their potential impact upon nature conservation sites is considered.

Summary: Oxford City Wildlife Sites, Local Wildlife Corridors and Green and Blue Infrastructure Networks are included. SACs and SSSIs are excluded from assessment unless specifically identified through call for sites or consultation.

Green Belt

2.1.11 Green Belt is a policy designation rather than an intrinsic designation therefore the boundary is capable of being altered. The NPPF allows for Green Belt boundaries to

be reviewed in exceptional circumstances through the preparation or review of a Local Plan (paragraph 140, NPPF). Such circumstances may include the need to allocate land for development, where suitable land is not available outside the Green Belt. This HELAA therefore includes Green Belt in the assessment area, although much of the Green Belt area is also a Flood Zone so much is likely to be unsuitable on the basis of flood risk irrespective of the Green Belt designation.

2.1.12 The majority of the Green Belt within Oxford City forms the river corridors of the Thames and Cherwell acting as floodplain and is also designated for its nature conservation and green and blue infrastructure network value. The river corridors run either side of the city, providing its characteristic form and enclosing its historic core.

2.1.13 To inform the Oxford Local Plan 2036, Oxford City Council commissioned a Green Belt Study (LUC, 2017). On the basis of this study the City Council included in the HELAA potential sites other than sites which would have a high or moderate-high impact on the purposes of the Green Belt, and also undertook a Green Belt Review which sets out the exceptional circumstances case to support the Local Plan 2036, and took forward seven of the sites as site allocations in the Local Plan to deliver residential development (mainly housing with one site for student accommodation). It is anticipated that an update to the Green Belt study will be undertaken to support Local Plan 2040, in the meantime the assumptions of the existing Green Belt Study are still considered to be very relevant and as such are carried forward into this HELAA.

Summary: sites within Green Belt are included for assessment.

Public Open Space and Open Air Sports Facilities

2.1.14 Public open spaces and private sports facilities provide opportunities for recreation, exercise and sport. They contribute to sustainable development by creating a green environment within the urban townscape which contributes to the character of the city and offers environmental benefits in terms of reducing surface run off and flood risk, and biodiversity. They contribute to social sustainability objectives in providing opportunities for healthy lifestyles and social/sporting activities. There are several types of open space:

a) Public Open Space

2.1.15 The NPPF, in paragraph 98, states that:

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."

2.1.16 In addition, specific public open space sites in Oxford are protected from any development by Local Plan Policy G1. In a built-up urban area like Oxford it is considered extremely

important to maintain access to open spaces, especially as the countryside is not within easy walking distance for most. It is particularly important that as new development occurs in Oxford and the population grows, enough infrastructure is in place to offer a good quality of life, and this includes green spaces.

2.1.17 Any further development or allocations resulting in the net loss of public open spaces protected under Policy G1 would have a detrimental effect and in the City Council's view would be contrary to the NPPF. However, to ensure that the assessment is thorough, public open space sites have been included in this assessment. Public open space that is not considered part of the Green and Blue Infrastructure Network (Policy G1) is discussed as part of the other green space categories below.

b) Private open space

2.1.18 Landowners of private open air sports facilities (universities and schools) were previously contacted i to confirm whether they consider any of their land to be surplus to requirements and they would wish it to be developed for housing or student accommodation or economic uses.

2.1.19 Any private open space sites were then assessed in terms of the Guidance suitability criteria, eg. environmental and physical constraint and impacts on surrounding area and prospective residents.

c) Outdoor Sports

2.1.20 Outdoor sports facilities are protected in the Local Plan 2036 under Policy G5. This policy protects against the loss of outdoor sports facilities but includes some criteria allowing for their development only if their loss can be compensated for. Many sports fields in Oxford are privately owned by Colleges or private schools and are not necessarily available for public use but private sports pitches have the potential to be used by the public and to meet increased demand through a growing population through community access packages. Their loss has a detrimental effect on the potential to make sites available to the public, as once an open air sports site is lost to development it is highly unlikely to ever be returned to that use. Open air sports facilities can also be an important part of the Green Infrastructure Network, in which case they are also protected under Policy G1.

2.1.21 The recently published Playing Pitch and Outdoor Sport Strategy 2022-2036 categorises the provision and need in Oxford. The main conclusion from the strategy is that there is currently some shortage of playing pitch provision in Oxford, and in particular pitches that have secured community use. The strategy concludes that all existing provision within the city should be protected but does not suggest that additional new pitches are required to meet the shortfall. The preference is to rely on securing community uses on private sites, plus planned 3G developments.

2.1.22 Private sports facilities clearly play an important role by providing, or having the potential to provide, community access. The NPPF does not distinguish between public and private open space in meeting sporting and recreation needs of the population.

2.1.23 The evidence continues to indicate the need to protect outdoor sports facilities. Nevertheless, sites which are allocated/protected for these uses have been included in this assessment to ensure that it is robust and thorough.

Summary: public and private open space sites, and outdoor sports facilities are included for assessment.

Allotments

2.1.24 The NPPF does not provide specific guidance on allotments but recognises their importance to enabling and supporting healthy lifestyles (paragraph 92, NPPF). In addition, Local Plan Policy G4 provides protection against development of allotments. The policy does not allow for loss of protected allotments; it does not preclude reprovision although it is expected there would be limited opportunities to re-provide the allotment space within the City. Allotments contribute to the social sustainability of places by creating healthy, inclusive communities and as such it is considered that the approach of G4 is consistent with the NPPF.

2.1.25 The majority of the allotment sites in Oxford continue to have waiting lists which illustrate the high demand which exists. Oxford is a very compact city and, unlike rural areas, many properties have very small or no gardens. Considering the garden sizes in Oxford, the likely increase in demand with new housing and population growth, and the sustainability benefits of local food production, their loss could have a significant negative impact upon the local community. Nonetheless the sites have not been excluded from the assessment to ensure that it is robust and thorough.

Summary: allotment sites are included for assessment.

Town Greens

2.1.26 Registered Town Greens have statutory protection against development by Section 12 of the Inclosure Act 1857 which makes it a criminal act to undertake any act which interrupts the use or enjoyment of a green as a place of exercise and recreation. Section 29 of the Commons Act 1876 makes it a public nuisance to exclude people from that area. Town Greens will therefore be excluded from assessment and are only assessed if they have been proposed through the call for sites or consultation in order to be transparent.

Summary: town green sites are excluded from the assessment unless specifically identified through call for sites or consultation.

Employment Sites

2.1.27 One of the three dimensions of sustainable development set out in the NPPF is an economic role: "– *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*" (paragraph 8, NPPF)

2.1.28 The NPPF supports sustainable economic growth and requires local authorities to set out a clear economic vision and strategy for their area which positively and proactively encourages economic growth (paragraph 82).

The Economic Vision for Oxford

2.1.29 The City Council has a clear economic vision and strategy. The Oxfordshire LEP, with Oxford at its heart, was awarded a total of £142.5 million from the Local Growth Fund 1, 2 and 3 from 2014-2017 to help drive growth in jobs and homes and attract further public and private investment. In August 2020, it was announced that a further £8.4 million worth of investment was secured from the Government's Getting Building Fund to give Oxfordshire businesses and communities a boost following the COVID-19 outbreak. There is a clear recognition of the vision and direction of travel for Oxford's economic growth. The Oxford city region is a national economic asset and the focus of a world class knowledge economy with one of the most substantial, diverse and important concentrations of research based, high value business activities in Europe. The city region is at the heart of the science and knowledge-based economy that Government identifies as the centrepiece of national economic recovery, as well as one of the UK's highest SME concentrations identified for growth. The leading clusters in the city region's knowledge-based economy are poised to grow substantially in coming years.

2.1.30 Key to this is Oxfordshire's Strategic Economic Plan (2016) which sets out the economic ambition for the area to 2030 – to drive accelerated economic growth to meet the needs of the science and knowledge rich economy. This recognises Oxford as a key element of the knowledge spine of Science Vale/Bicester/Oxford and the importance of investment in the critical infrastructure necessary to realise the full potential of Oxford's world class education, research and innovation. This vision is reinforced in the Oxfordshire Strategic Economic Plan (March 2017), which sets out the long-term vision and ambitions for economic growth in the county and states that by 2030 "Oxfordshire will be recognised as a vibrant, sustainable, inclusive world leading economy, driven by innovation, enterprise and research intelligence." The Local Industrial Strategy (LIS) positions Oxfordshire and Oxford as one of the top three clusters in the world for a number of technologies.

2.1.31 To help deliver this, Local Plan Policy E1 protects employment sites that support nationally and regionally sectors in the knowledge economy or are significant employers or sectors in Oxford. These are known as Category 1 employment sites, but the policy also provides flexibility and sets out criteria where other uses may be allowed on Category 2 sites and criteria for the potential loss of Category 3 sites. These sites have more of a local function and in the case of Category 3, the sites may be smaller in size, perform a less significant economic function and/ or may not benefit from being well located.

2.1.32 The economic evidence collected for the latest interim Employment Land Assessment (2022) points to continuing strong demand for employment land, and an undersupply of employment land to meet this demand. According to the initial findings of the interim ELA, the demand-supply balance for four out of five scenarios result in a surplus in employment land. Only under Scenario 2, the Transformational Trajectory is there a shortfall in the supply of employment land space related to Office and R&D uses. In addition, there would

not be sufficient supply available under the majority of scenarios to meet general industrial and distribution requirements. As evidenced in the interim ELA, whilst the City is primarily dominated by demand for office and R&D space, there is also a buoyant demand for industrial stock in the City.

2.1.33 In terms of the City's supply position, the interim ELA highlights that the City contains a good range of employment sites of different quality and types. However, most Category 1 sites relate to hospital and research activity owned by either Oxford University or Oxford University Hospital NHS Trust. On this basis, the sites' availability for other occupiers is likely to be limited. Therefore, the interim ELA concludes that the majority of the future capacity across the City that will be available to accommodate the indigenous employment needs across the Plan period is concentrated across four sites: Oxford Business Park, Oxford Science Park, Northern Gateway and the wider West End Regeneration, which totals 379,200 sq.m including consented schemes across these sites.

2.1.34 The HELAA has not excluded Category 1 and 2 employment sites or other employment land (Category 3) from the assessment as it is necessary to take all land into account and assess each site on a case by case basis. The assessment of land for development (housing and economic uses) has taken this evidence of supply and demand for employment land into account when assessing sites for potential change of use from employment. Where there is evidence that net additional employment space is likely to come forward, e g. through intensification or development of vacant plots, this has been added into the assessment.

Summary: Category 1 and Category 2 employment sites and other employment sites (Category 3) are included in the assessment.

Source of sites

2.1.35 For this HELAA, sites assessed were drawn from the following sources to meet the requirements of the HELAA guidance and the Joint Methodology:

- Sites were identified through a 'call for sites'. During August and September 2021 the City Council undertook a "call for sites" requesting any new sites or updates to previously-considered sites. This involved contacting all the major landowners, planning agents, public bodies, large institutions and registered providers known to the City Council. Each of the sites identified from these call for sites exercises, that met the threshold criteria are listed in Appendix A (those not meeting the threshold are listed in Appendix E).

- Sites that were already subject to the plan making process, i.e. allocated sites and those rejected at earlier stages of plan making;

- Sites that have planning permission and which were either under construction or where the development had yet to start (commitments). Note any sites which have commenced and completed since 1 April 2020 (which is the base date of the HELAA and base date of the Plan) will be listed in Appendix D as completions within the plan period. Sites completed since the 2019 HELAA update but prior to 01.04.2020 will be listed in Appendix C and are not counted within the HELAA supply since they are

outside of the Plan period 2020-2040.

- Planning refusals/withdrawn applications. A search for the relevant applications was made for the period since the last HELAA update in 2019. Relevant applications prior to this would have been already included from the 2019 update;

- Lapsed permissions;

- Development Management pre-applications. A search for relevant applications was made to cover the period since the last HELAA update in 2019. Pre-application discussions are confidential however we contacted landowners to encourage them to submit a Call for Sites form, which we could then use as public evidence for the HELAA (and the Local Plan evidence base);

- Any sites that were identified in the Employment Land Assessment (2016) as having potential for additional employment or housing; and

- All sites that were assessed in the 2019 HELAA Table A were reassessed.

2.1.36 Potential new employment/commercial sites, including employment land (B2 and B8) and other commercial uses such as retail, leisure and community facilities (Use Class E and F)[10], along with housing sites, were mapped by the City Council and considered for the HELAA. The threshold for economic uses is 0.25ha or 500 sq m.

2.1.37 A desk-based mapping exercise was also carried out to identify any other potential sites that may have been missed by the processes set out above.

2.2 STAGE 2: SITE / BROAD LOCATION ASSESSMENT

Estimating development potential

2.2.1 Development potential of a site is a significant factor that affects the economic viability of a site and its suitability for a particular use. Therefore, the Guidance suggests that assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential. The Guidance states that the development potential can be guided by existing or emerging plan policies including locally determined policies on density and should also seek to make efficient use of land in line with the NPPF (PPG, paragraph 16).

2.2.2 The Oxford Local Plan 2036 (Policy RE2) requires efficient use of land on all sites, and sets out a density expectation for residential sites in the city and district centres (indicatively 100dph).

2.2.3 The approach followed in the HELAA for estimating development potential of different sites outside of those areas is set out below.

[10] In accordance with national guidance categories

Residential

Bespoke site-specific Capacities

2.2.4 For sites allocated in the local development plan (the Local Plan 2040 or an area action plan) then the capacity in the adopted policy has been taken as the starting point. Similarly if there is an extant planning permission in place then the capacity figure has been taken from the planning permission.

2.2.5 The next step for the capacity assessment was to consider landowners' or site promoters' capacity assessments of sites where these were provided, for example via underdetermined (or refused) planning applications or Call for Sites information. This figure was checked against a typology approach (bandings explained in next section) explained below to ensure it was realistic in terms of the site size, location and characteristics. Finally site-specific urban design assessments were undertaken to consider site constraints and opportunities in more detail, and in some instances this led to further refinement of the residential capacity estimate for a site. For any sites which did not have either an allocation or an indication of capacity from a landowner (ie entirely officer identified) then a density typology approach, combined with site-specific urban design assessment, was applied.

Density Bandings for HELAA Capacity Estimates

2.2.6 Density bandings were also used to inform the HELAA assessment as a cross-check for residential capacities. The approach is based on four typologies of development and takes into account NPPF guidance about establishing sound density figures/standards (NPPF 124/5).

2.2.7 A thorough process was undertaken in order to establish contextually accurate readings of existing population and settlement densities in a series of varied locations around Oxford. This was originally undertaken for the 2016 HELAA and updated in 2019 with more recent data from planning applications (refer back to those documents for details about the sample sites and approach). The four typologies of development were identified and informed using the professional expertise of Council officers in the Urban Design & Heritage team and the Planning Policy team, and were set out as 'District centre', 'Gateway site', 'Suburban site', and 'Conservation area'.

2.2.8 This evidence informed a series of bandings considered to be appropriate for the Oxford context – both in terms of the physical features of the city and in terms of the constraints, pressures, needs, and aspirations of the city:

Table 2: HELAA capacity density bandings according to development typology

Development typology	Proposed density banding (units per ha.)
District centre	*100-120*
Gateway site	*60-70*

Suburban site	*50-60*
Conservation area	*35-55*

2.2.9 It is important to bear in mind that these density bandings were set out for the purpose of estimating housing capacity numbers in the HELAA. These bandings are not proposed to be used as guides for development in Oxford, although they have been developed bearing in mind the characteristics of Oxford and the ambitions of the Local Plan for future development. It is important to note that these capacity estimates were only used in the absence of up-to-date information on sites – either from a site allocation, or from a planning application or Call for Sites submission, and where the bandings were applied then often an urban-design led site-specific assessment was also undertaken

Approach to Student Accommodation Capacity Assessments

2.2.10 As per the previous section, the starting point for the capacity assessment for student accommodation was to use the capacity figure from a site allocation or an extant permission where available. Next was to consider landowners' or site promoters' capacity assessments of sites where these were provided via Call for Sites or planning applications (refused or undetermined). Where estimations were presented as numbers of rooms this figure was divided by 2.5 (the national ratio set out in the Housing Delivery Test) in order to provide a comparable unit.

2.2.11 For sites where landowners' estimates were not given, average densities were worked out according to the residential development typologies, as described above. In addition, site-specific urban design assessments were undertaken to consider site constraints and opportunities in more detail, and in some instances this led to further refinement of the capacity estimate for the site.

Economic land

2.2.12 For the employment sites, the approach taken to assessing development potential was as follows:

2.2.13 For sites already in the planning process, with a realistic estimate of the amount of floorspace by type that is expected to be delivered already known, this figure was the starting point and reviewed through the interim ELA and adjusted where necessary.

2.2.14 In many cases additional economic floorspace is expected however the exact types and quantum of floorspace will be confirmed if and when a planning application is submitted. Some individual floorspace assumptions for sites are provided in Appendix B where there was sufficient information available to apply a plot ratio, however where the exact amount and mix of uses on sites is yet to be determined, employment capacities have been listed as "TBC". As discussions with development partners progress and further information becomes available the HELAA will be updated accordingly to reflect these changes.

2.2.15 For sites where a plot ratio was applied, this was informed by latest data from the interim ELA. The plot ratio is the amount of employment floorspace of different types that is

expected per hectare of land. The plot ratios used are set out below. Using these ratios, as an example, for every 1 Ha of land you could accommodate 4,000sq m of industrial or warehousing floorspace or 15,000 sq m of offices at town centre locations. It takes into account that office floorspace is usually developed at a higher density and generally occupy taller buildings than industrial, which tends to be in less central locations and requires more land. These assumptions are based on the latest HCA guidance on job density ratios produced in 2015. This guidance takes account of recent trends in terms of changing utilisation of employment space, including more efficient use of office floorspace due to a higher frequency of flexible working and hot-desking. The estimates produced for employment sites based on plot ratios are approximate figures only and should be taken as an indication rather than an exact figure.

Table 3: Plot ratios for assessing employment floorspace of different types expected per hectare of land (from interim ELA 2022)

	Plot ratio
Offices at Oxford Science and Business Parks	**1.1**
Offices at Town centre locations (including West End)	**1.54**
Light industrial (low density light industrial plus R&D light industrial)	**0.8**
Industrial and distribution	**0.4**

2.2.16 Note for mixed use sites, where there is not a known capacity figure or split of the site, the capacity estimates set out in Appendix B are based on either 100% residential or 100% economic. Therefore in effect there is an over-estimation because the site is intended to be mixed use, but in the absence of a robust justification for a percentage split then this was a practical approach.

Suitability of sites

2.2.17 The Guidance states that a site's suitability for economic development should be assessed against the following factors:

- The development plan and national policy taking into account how up to date policies are, the appropriateness of constraints and whether constraints can be overcome. Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Potential impacts including effect upon landscape features, nature and heritage conservation (PPG paragaph 18).

2.2.18 All sites identified as part of the HELAA have been assessed against the above factors to give an indication of each site's potential suitability for development (housing or

economic). The assessment drew on officers' detailed knowledge of individual sites through site visits, pre-application discussions and landowner engagement.

2.2.19 New sites with only economic uses proposed by the landowner were assessed in terms of the suitability of a site for employment use, including considering location and accessibility, for example sites identified through planning applications for economic uses.

2.2.20 In terms of market attractiveness, this assessment has taken the broad view that whilst some areas of Oxford are more attractive to developers than others, the whole of Oxford exhibits very high demand for housing and employment and that no site should be rejected on this basis.

Availability of sites

2.2.21 The Guidance considers a site to be 'available' for development when, on the best information available, there is confidence that there are no legal or ownership impediments to development. Generally this means that the landowner has expressed an intention to develop, or that it is in the control of a developer who has expressed an intention to develop.

2.2.22 The conclusions about site availability were informed by officer understanding of the site, for example through planning applications or informal pre- application discussions, and through contact with landowners to confirm their intentions, and the call for sites. Where there had been no recent engagement with landowner via the planning process then they were contacted directly. Where only part of a site is available then it is noted in the assessment table (Appendix A), and the estimated capacity / dwellings figures (Appendix B) were adjusted to reflect that.

Achievability of sites

2.2.23 The Guidance defines an achievable site as one where there is a reasonable prospect that the particular type of development will be developed on that site at a particular point in time. It is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period (PPG paragraph 20).

2.2.24 For sites where there is an extant planning permission, or a site allocation in the 2036 Local Plan, or a Call for Sites submission then it has been assumed that the landowner and/or the planning inspector judges the site to be achievable. For remaining sites where there is no recent landowner engagement or consideration by a planning inspector then the Local Plan evidence base has been drawn on. A whole-plan assessment of viability has been undertaken to support the Local Plan 2040 and the revised CIL Charging Schedule. This evidence used sample sites of different sizes and in different parts of Oxford and demonstrates that development that takes place in accordance with the Local Plan is viable across Oxford. This work concluded that viability should not hold back residential sites in Oxford.

2.2.25 Furthermore, in cases where a site containing residential development may be on the margins of viability, or unviable, the Local Plan policies are flexible in its approach to affordable housing requirements should robust evidence be provided by the applicant to demonstrate unviability. The City Council would then gradually reduce the affordable housing requirement until a point at which the development became viable so there should

not be a circumstance where a site would be unviable for residential development. For this reason this assessment has taken the broad view that sites are viable or that they could be made viable by using the available flexibility in the policies. As a cross-check, the viability typologies approach from the 2016 HELAA has also been checked.

Timescales

2.2.26 Based on the Guidance, each site has been assigned a timescale for delivery which is either 1-5 years, 6-10 years, 11-15 years, or 16 years or beyond from the base date of the HELAA (2020).

2.2.27 The timescales depend on the information known about each site in relation to its suitability and availability for housing or economic use. If there are no known constraints to development and the site is owned or controlled by a landowner / developer who is in the process of bringing the site forward for development or intends to take the site forward for development immediately, this site will fall into the 1-5 year timescale. The NPPF requires that there should be a 5 year supply of deliverable sites (NPPF para 68). Sites are deliverable if there is clear evidence that housing completions will begin on site in five years. Except for commencements and sites with planning permission, sites were only included in the 1-5 year time period if evidence about deliverability was provided from the landowner. If a site is complex, is in multiple ownership, has constraints to development or there is no clear immediate intent to develop, this site is assigned a later timescale eg. 6-10 years or 11-15 years. If a site is expected to come forward for housing within the plan period but there are severe constraints to delivery or intention to develop is not clear these sites are assigned the 16+ years category. If the timescale for delivery is unconfirmed by the landowner if other sufficient certainty about delivery then Appendix B notes the phasing as “TBC” for this interim HELAA.

2.2.28 A broad assumption has been made on build out rates and lead in times reflecting evidence about the current housing market in Oxford (based on a sample of Oxford sites, as set out in Appendix E of 2019 HELAA). Build out rates are assumed to be 100 units per year, with a 12 month lead-in time. Therefore for a site of 500 units with no constraints to delivery, 400 units are expected to be delivered in the 1-5 year timeframe, with a further 100 units in years 6-10.

2.2.29 Due to the base date of the HELAA (and the Local Plan) being 2020, whilst this assessment is being undertaken in 2022, then there are some sites in the HELAA which have already delivered some completions or are fully built out, Appendix D. There are also some larger phased sites which delivered part of their capacity prior to 2020, and this is also shown in Appendix B (to explain how the overall capacity of the site is being met) however any completions prior to 01.04.2020 are not being counted in the capacity figure identified in the HELAA because that is before the Plan base date. Any sites fully completed prior to 01.04.2020 are also not counted in the HELAA and are set out in Appendix C.

2.3 STAGE 3 WINDFALL ASSESSMENT

2.3.1 Windfall sites are sites which have not been specifically identified in the development plan. They normally comprise previously-developed sites that have unexpectedly become available or have not been identified because they are too small.

2.3.2 Guidance states that a windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence (NPPF paragraph 71). Any allowance should be realistic h aving regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends." (NPPF, paragraph 71).

2.3.3 The role of windfall in a HELAA is to provide an allowance for sites which contribute to future housing supply through an analysis of past trends. Using past trends and extrapolating forward means that there is some evidence and certainty that this source of supply will continue forward over the local plan period.

2.3.4 Oxford continues to have a strong housing market with high demand for new homes and as such windfalls have consistently come forward in the City. At the time of publication it is extremely difficult to predict economic conditions in the UK over the next decade. However, it is clear that housing demand will continue, particularly in areas such as Oxford where supply is constrained.

2.3.5 For the purposes of the calculation of windfall rates, and to avoid double counting with sites identified in Table B of the HELAA, most sites included as windfall are those of 1-9 units. Most of these sites come from the following categories: subdivision of existing housing, flats over shops, intensification of sites, redevelopment of existing housing, development of derelict land/ buildings on brownfield land and conversion of commercial land to housing. The NPPF 2021 does not suggest that garden land should be excluded from windfall calculations. It says *Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Housing on garden land is not prevented by policy and has been a consistent source of windfalls over time*. Therefore it is included within the totals. Table 4 shows that windfalls on sites of 1-9 units has provided a consistent source of housing over time. Completions from B56 Prior Approval sites (office/retail to residential conversions) of 1-9 units are also included within these figures. This looks back over the previous six years, to 2016/17, the start of the Local Plan 2036.

Table 4: Windfall housing completion trends from small sites (1-9)

Site size- no. units	2016 -17	2017 -18	2018 -19	2019-20	2020/21	2021/22
1-9	274	52	106	89	85	156
Total windfall over 6 years (127x6) 762						
Average windfall per year 127						

2.3.6 Table 4 shows an average annual windfall figure of 127 units, which includes garden land and only sites under 10 units (including B56 sites). Larger windfalls do also come forward in the city: In recent years these have largely been from student accommodation that has come forward on unidentified sites. Local Plan 2040 policies concerning student accommodation are restrictive about their suitable locations and occupiers and extensive work has taken place to understand the needs and intentions of the universities and to identify sites; therefore they are not expected to be significant numbers of student accommodation schemes coming forward on sites that are not identified and this stream of windfalls is not included in the trends analysis. There has also been some larger windfall (>10 units) from B56 permissions for conversions of offices to residential (such as Former Nielsen House 134 units), these are identified and counted in Table B so are not factored into the windfall assumption.

Conclusion on estimated windfall supply in Oxford

2.3.7 Based on the analysis of past completion rates in Oxford, the annual windfall allowance to be included in the HELAA is 127 units per annum (including development on garden land).

2.3.8 Windfall housing has not been counted for 2020/21 and 2021/22 because completion data is available. Windfall has also not been counted for three years ahead, ie 2022/23, 2023/24 or 2024/25. This in order to avoid double counting with existing commitments in the Housing Land Supply calculations. Therefore, an allowance has been included for windfalls for years 6 (2025/26) onwards, giving a total anticipated windfall over the plan period of (127x15) 1905 units. This is justified because the data shows an ongoing significant contribution of windfall to the housing supply across all wards. There is no expectation that this trend would change during the plan period and therefore Oxford City Council are confident that this is a windfall source that will continue and should be included in the HELAA figures.

2.3.9 The windfall figures coming forward will be closely monitored and if they fall short of or exceed the estimates provided in this HELAA, they will be revised in future land assessments.

2.4 STAGE 4 ASSESSMENT REVIEW

2.4.1 The conclusions and assessments across all sites, and the total estimated supply of sites identified in the interim report, will be published as part of the Preferred Options consultation in Autumn 2022 for landowners, developers and agents to review.

2.5 STAGE 5 FINAL EVIDENCE BASE

2.5.1 The final evidence base has been collated into two key tables in the Appendices. Appendix A lists all sites which have been considered and sets out the results of the assessment in terms of the judgement on the suitability, availability, and achievability of each site for housing and/or economic use. Appendix B includes only those sites which are suitable, available and achievable, and sets out the development potential of each site and the timescales for delivery.

2.5.2 The interim Employment Land Assessment (2022) considers the current stock of employment land in Oxford and the results of this have informed the HELAA.

3 SITE ASSESSMENT SUMMARY

3.1 Introduction

3.1.1 This chapter sets out the results of the HELAA in summary. Full details of the site assessment results can be found in Appendices A and B.

3.1.6 Each site included in the assessment is shown on a map in Maps 1-3. Sites that have been assessed as having development potential for each housing, mixed use or economic use are shown on Maps 4-6.

Table 5: Maps of the sites assessed

Map No	Purpose
Maps 1-3	Shows all sites identified for assessment (all those listed in Appendix A).
Maps 3-6	Identification of those sites accepted as having potential for housing, or employment, or mixed use/both (all those listed in Appendix B)**.**

3.2 Summary of Development potential

3.2.1 In summary, this interim HELAA assesses 471 sites. The housing potential at the base date of 2020 from all identified sites which have been assessed as suitable, available and achievable is **7242** (8047 – 10%) dwellings. This includes a 10% reduction to account for potential non-delivery of identified sites and includes dwelling completions for the 2020/21 and 2021/22 monitoring years.

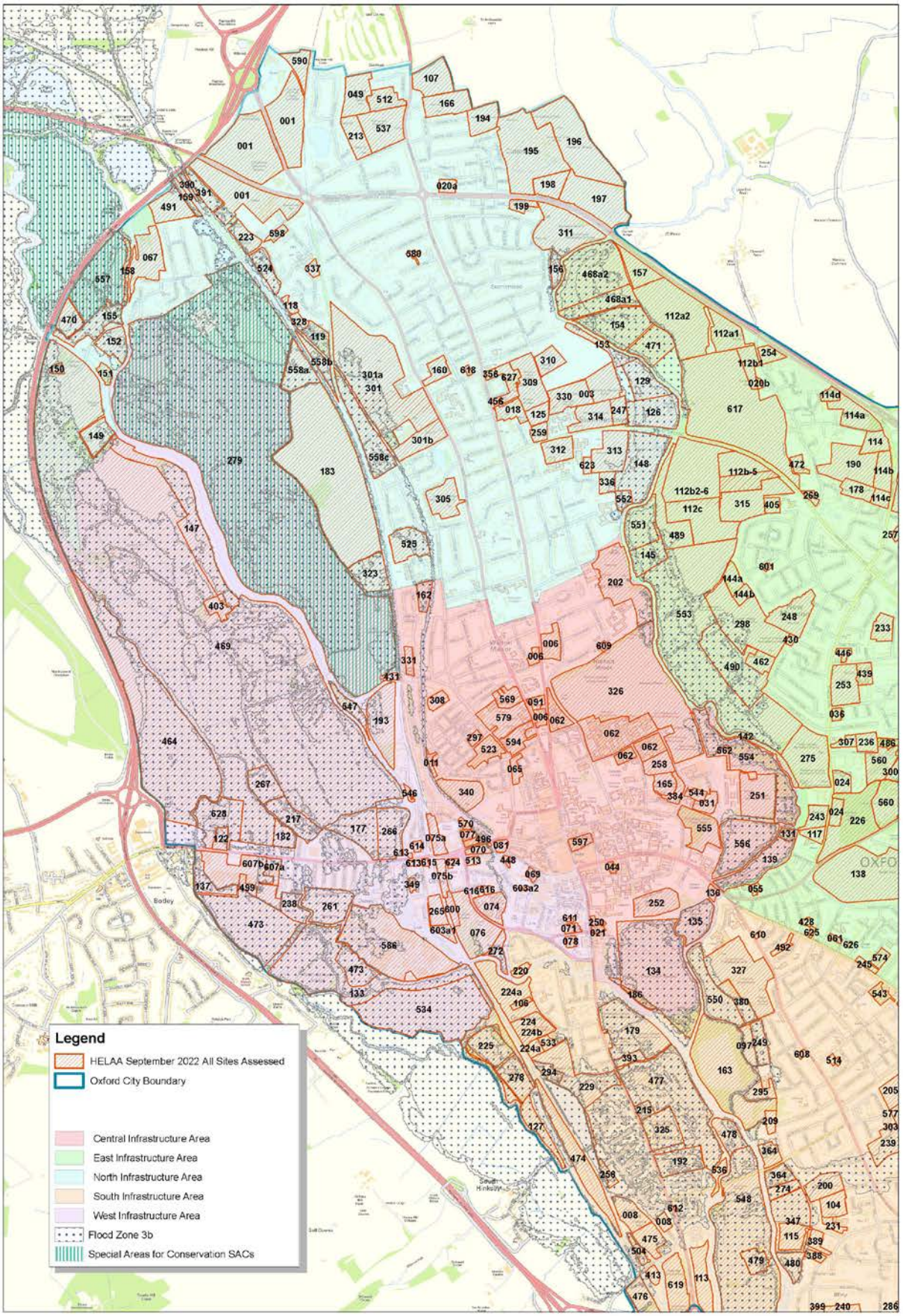
3.2.3 In addition, there is an estimated contribution to the housing supply from windfall sources of 127 dwellings per year (including prior approvals), which adds (127x15) 1905 to the HELAA supply figure.

3.2.4 **The total housing supply from identified HELAA sites and windfalls is therefore (7242 +1905) 9147 dwellings for the Local Plan period 2020-40.**

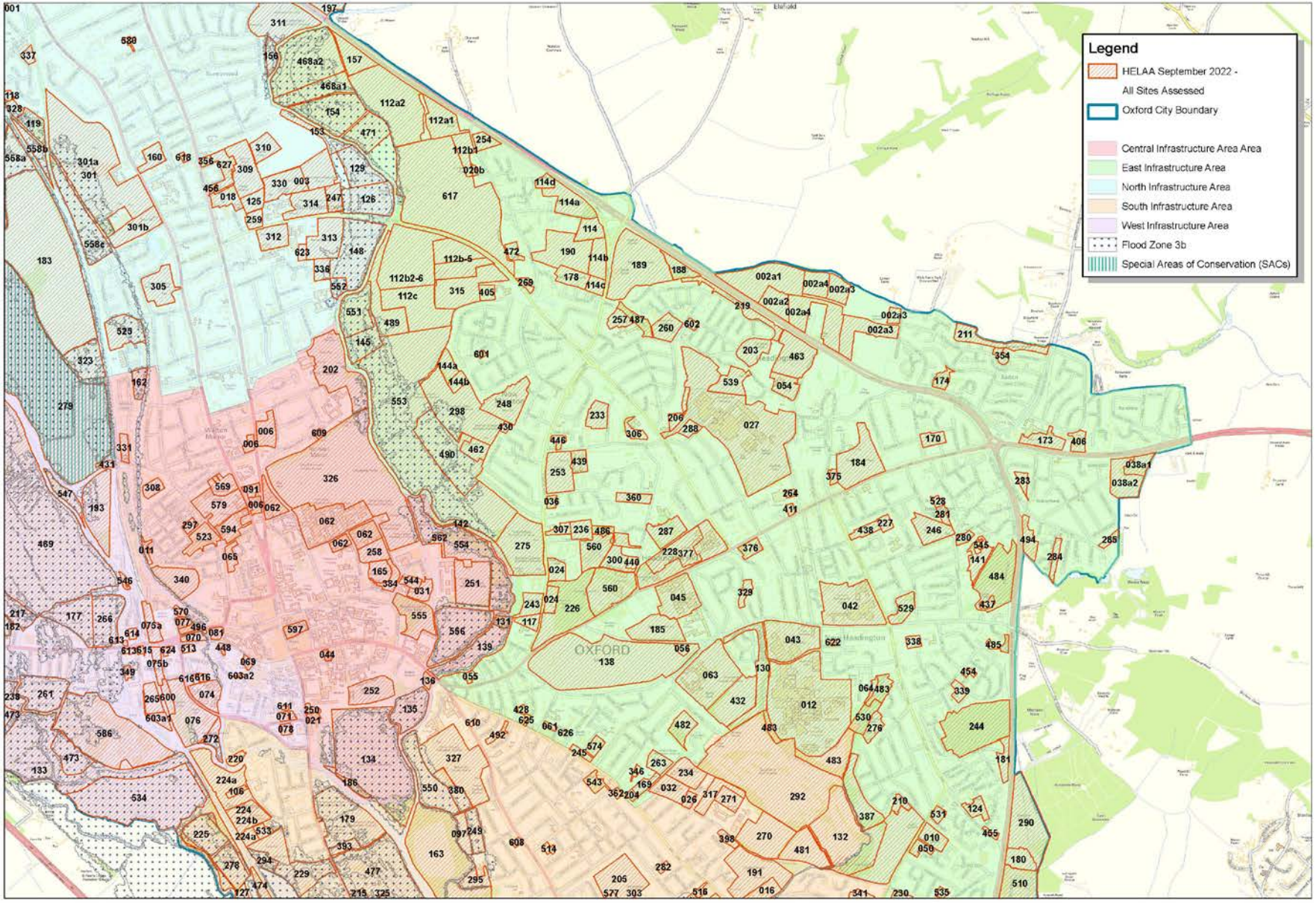
3.2.5 The HELAA figures provide a snapshot in time representing the situation under the current national policy approach, and the current information available about site constraints, landowner intentions and site viability. The HELAA does not allocate housing sites and does not replace the normal Local Plan making or planning application process.

MAPS 1-3: MAPS OF ALL SITES ASSESSED

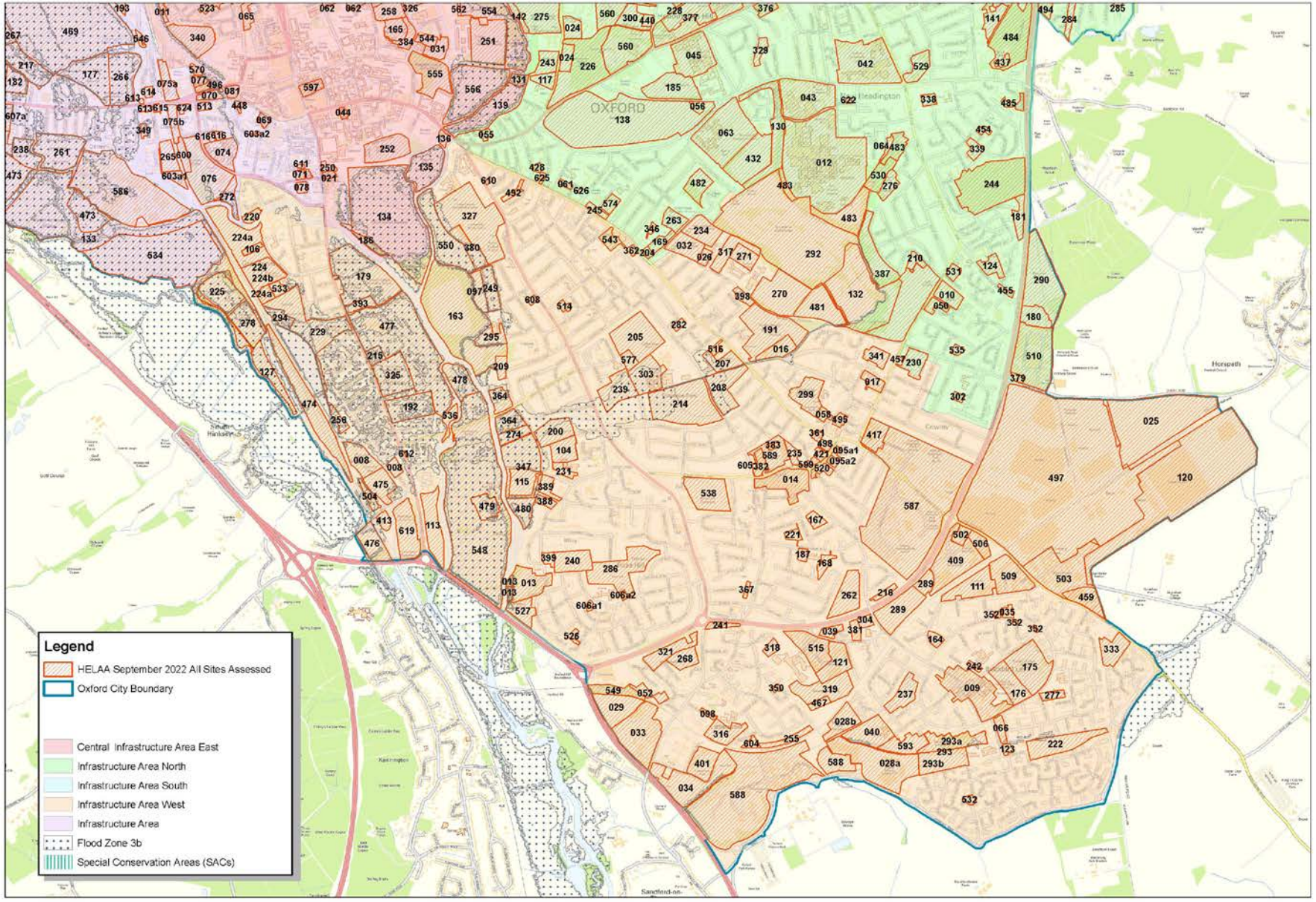
Map 1: All Sites Assessed North, Central and West Areas



Map 2: All Sites Assessed - East Area

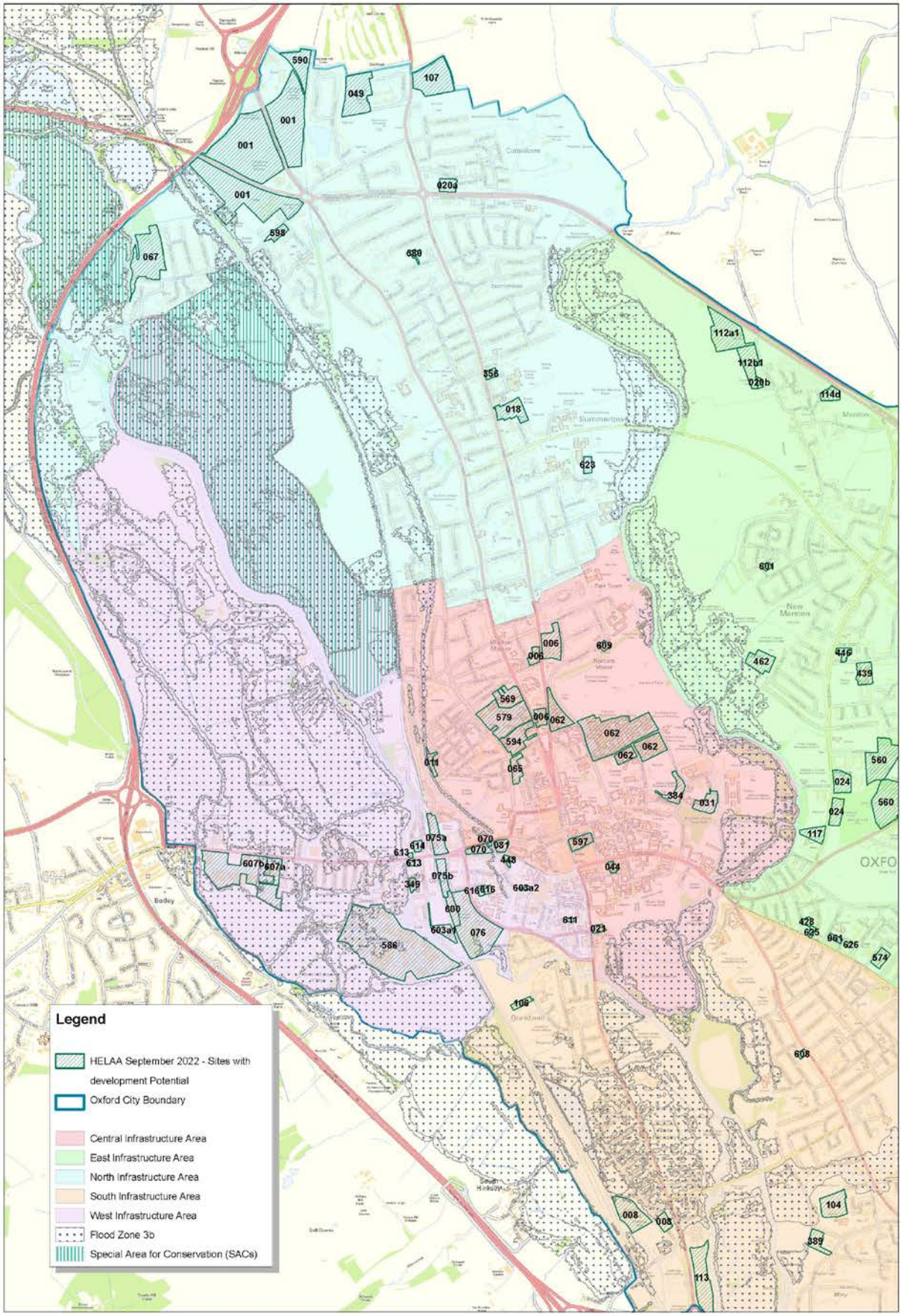


Map 3: All Sites Assessed - South Area

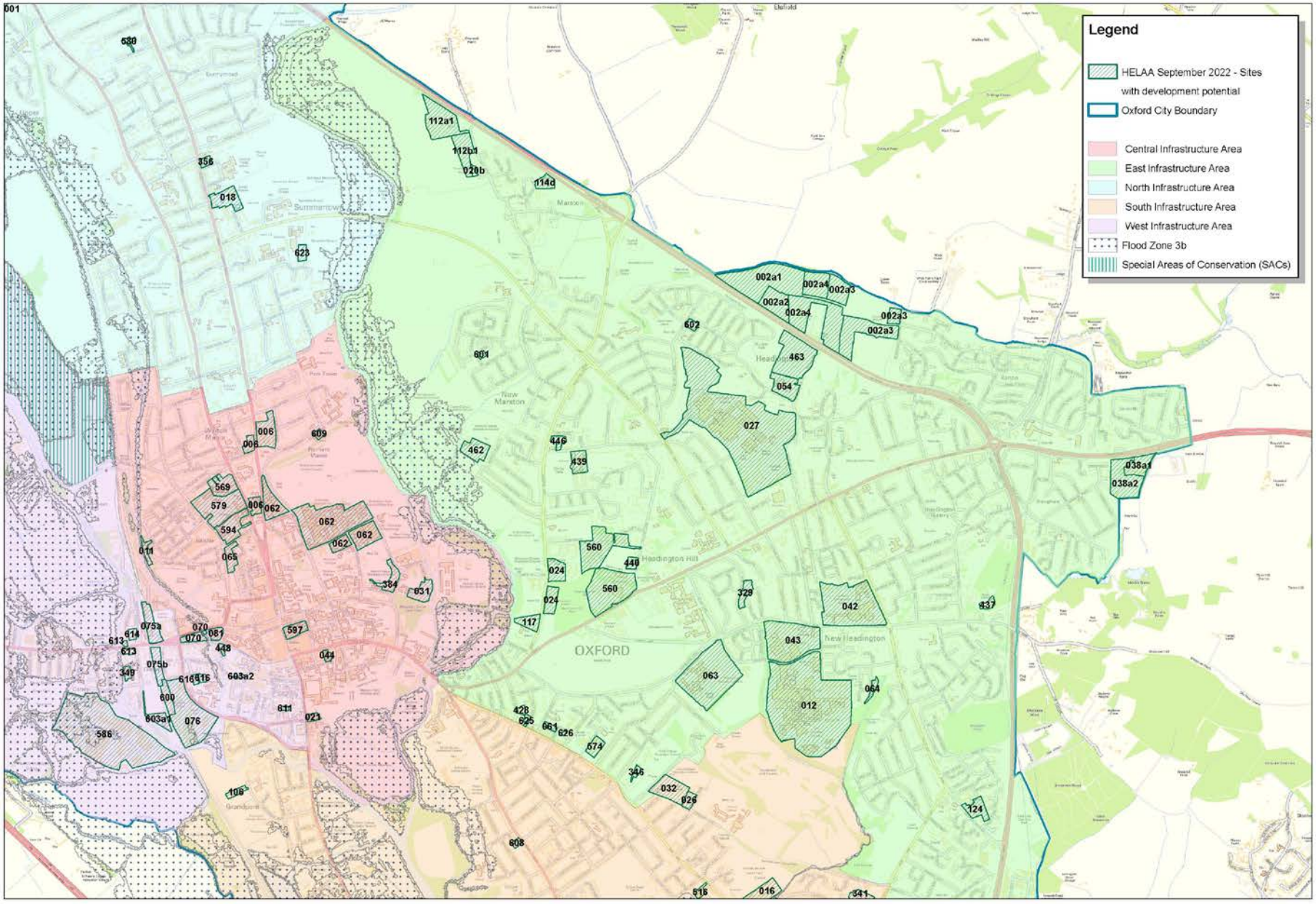


MAPS 4-6: MAPS OF ALL SITES WITH DEVELOPMENT POTENTIAL

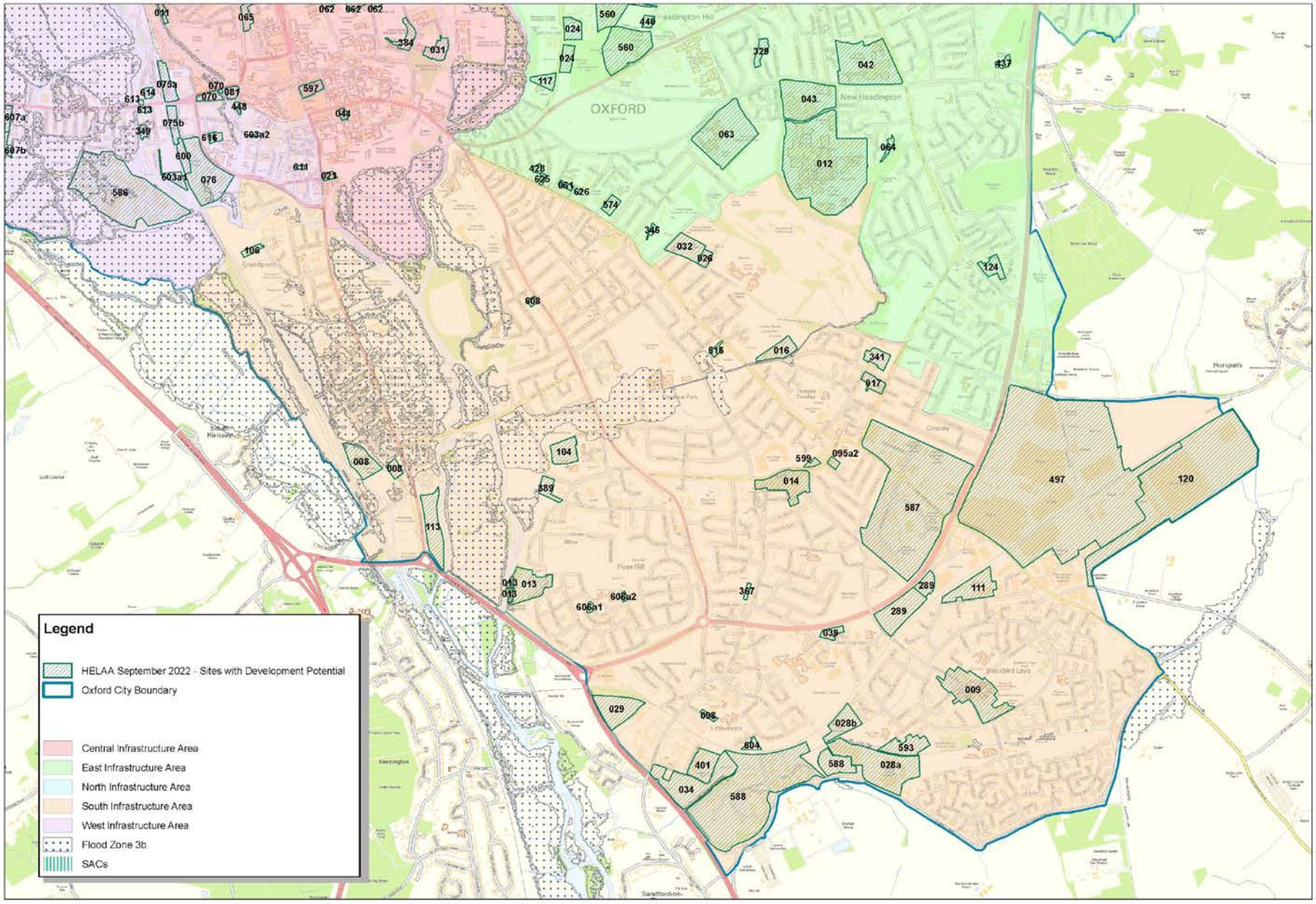
Map 4: Sites with Development Potential - North, Central and West Areas



Map 5: Sites with Development Potential - East Area



Map 6: Sites with Development Potential - South Area



3.3 Five year housing land supply

3.3.1 The timescales presented in Appendix B are indication of when during the next 20 years each site is likely to come forward for development. For some sites, where there was insufficient certainty, the timescale is marked as “TBC”, but are still counted in the overall figures for the plan period 2020-2040.

3.4 Employment land supply

3.4.1 Sites that are expected to come forward with an economic element have not been explicitly assigned to a timescale. The majority of the sites with an economic use are mixed use proposals and it is expected that the employment floorspace would be delivered in parallel with housing and other uses. For sites with planning permission for economic use, it is expected that this will be delivered within five years. Sites without planning permission but which are being promoted for economic use are expected to be delivered within the 6-10 or 11-15 year period, depending on the viability of the site and changes in the market, and whether there are any particularly complex constraints including environmental constraints or legal/ownership issues.

4 CONCLUSION

4.0.1 The Housing and Economic Land Availability Assessment (HELAA) has assessed all sites with potential for housing or economic use over the Local Plan period. It fulfills the requirements as set out in NPPF and associated Planning Practice Guidance for the assessment, namely to:

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

4.0.2 Appendix A lists all sites assessed as part of the HELAA with a conclusion about the suitability and availability of each site in terms of potential development for housing. For sites which have been assessed as suitable and available, an indication of the number of dwellings achievable on each site is shown and the expected timescale for delivery in Appendix B.

4.0.3 As well as suitability and availability, sites must also be viable to be judged as achievable for housing delivery. Individual viability assessments for residential development on each site have not been carried out as existing evidence demonstrates that the majority of sites in Oxford City are viable, and for those where the landowner can demonstrate unviability, the Council can be flexible in applying Affordable Housing requirements to allow a site to become viable.

4.0.4 The HELAA figures represent the situation under the current national policy approach, and the current information available about the sites, viability, and ownership. The

HELAA does not allocate housing sites and does not replace the normal Local Plan making or planning application process.

4.1 Consideration of risk

4.1.1 The HELAA has set out a trajectory of deliverable and developable housing and economic sites that are expected to come forward over the plan period.

4.1.2 It is not expected that every site identified will come forward for development in the plan period to 2040 due to unforeseen circumstances such as economic conditions and site specific circumstances.

4.1.3 The overall figures resulting from the assessment show that the potential for new development to come forward in Oxford is severely limited because of the physical constraints of the city. The overall housing capacity and economic floorspace identified is considered to be the maximum that could be achieved because of the following considerations:

- The capacity identified includes sites currently designated as Green Belt which would be highly contentious and will need to reviewed through the Local Plan 2040 process, exceptional circumstances test, and Examination in order to be allocated for housing;

- Sites with an element of FZ3b, 3a or 2 or any site over 1ha will require a more detailed site-specific Flood Risk Assessment at later stages, which may impact on capacity. Any development proposals in FZ3a will also need to successfully pass the Sequential and Exceptions tests set out in national policy.

4.1.4 This trajectory is a combination of evidence and judgement, and it is probable that some sites will not come forward as expected, while other sites may come forward that had not been foreseen.

4.1.5 In particular, because the HELAA has taken a rigorous approach to identify all development potential and there has been an ambitious presumption that sites will be delivered even where there are significant constraints identified e.g. Flood Zone 3, Green Belt sites, wildlife sites in an attempt to leave no stone unturned and be as thorough as possible. This however carries a risk that some of these sites will not be delivered.

4.1.6 Therefore the final figures for housing and economic use should be seen as a maximum capacity scenario.

Appendices

Appendix A – All sites assessed

Appendix B – Sites with development potential

Appendix C – Sites completed up to 31.03.2020

Appendix D – Sites completed 01.04.2020 onwards

Appendix E – Sites not meeting HELAA threshold