

***Oxford City Council***

***Housing and  
Economic Land  
Availability  
Assessment (HELAA)***

September 2023

***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
ELNA	Employment Land Needs 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 the Local Plan 2040 (OLP 2040), which will provide a framework for future development across the city. This HELAA update to support the OLP 2040 uses the Plan base date of 2020.

The key updates since the September 2022 Interim HELAA are to:

- Update landowner intentions for sites
- Update the completions monitoring data, and planning permissions, to September 2023
- Update windfall assumption to take account of 2022/23 monitoring data
- Update to reflect the draft policies in LP2040

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 HELAA has followed the methodology set out in the Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment and the guidance in the Oxfordshire Joint HELAA Methodology (the “joint methodology”) but also reflects the local circumstances that are pertinent to Oxford, as acknowledged in the joint methodology.

The HELAA considers sites with potential for housing (including student accommodation) over 0.25 ha (or capable of delivering 10+ dwellings net gain), and economic uses (Use Class B2 and Use Class E) over 500 square metres.

The HELAA first assesses whether each site is suitable, available and achievable (viable) for development. Sites with development potential during the plan period 2020 to 2040 are then given a development potential figure (the capacity of the site for development).

The HELAA is also informed by the Employment Land Needs Assessment (2022 & 2023), 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 HELAA is shown on a map in Maps 1-3. Sites that have been assessed as having development potential are additionally shown on Maps 4-6.

Appendix A is the detailed site assessment table, and Appendix B sets out capacity figures for sites assessed as deliverable/developable (including those sites which have already been built out since 2020 (the Plan base date). Whilst Appendix C lists sites which are not likely to deliver 10+ dwellings net gain so would be counted as windfall.

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.

# 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 to 2036 (LP2036). The Local Plan 2040 (LP2040) looks further ahead for the period 2020-2040. Capacity for new homes is a key issue for LP2040 because – as with previous local plans – the constrained nature of the city means that there is a greater need for new homes than there is capacity or supply of sites for development. The HELAA is a key tool for assessing sites for opportunities for net additional housing either through reuse or intensification of existing brownfield land, or through development on unoccupied land including greenfield land. A HELAA also assesses sites for opportunities for net additional economic use, although the need for new homes in Oxford is so great that the spatial strategy prioritises land for homes and no new sites are being identified for economic use in LP2040.

1.1.2 There are some key points that should be acknowledged with reference to this HELAA:

- 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 is made through Local Plans (including Sustainability Appraisal), and through the planning application process when judging planning applications;
- 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 at the time: It is 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 to reflect land ownership, constraints may be overcome/mitigated or additional constraints identified, development delivery timescales may change, and site capacity or densities may change.

1.1.3 The HELAA provides background evidence on the potential availability of land in Oxford for housing and economic uses. 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<sup>1</sup>. This HELAA fulfils

<sup>1</sup> DLUHC (2021) National Planning Policy Framework, para 68 and 82

the requirements as set out in NPPF and associated Planning Practice Guidance<sup>2</sup> for the assessment 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).

### 1.3 Land uses included in the assessment

1.3.1 This 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 in advance, sites of 1-9 were considered more appropriately 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<sup>3</sup>. Sites with anticipated capacity of less than 10 dwellings are listed in Appendix C instead.

1.3.2 The HELAA assess sites for the following residential and for economic uses:

#### *Housing*

##### ***General housing***

1.3.3 The Government's definition of a dwelling is a self-contained unit of accommodation<sup>4</sup>. 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.

1.3.4 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***

1.3.5 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,

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<sup>2</sup> Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 001

<sup>3</sup> Oxfordshire Joint HELAA Methodology (November 2021): Table below Para 3.15

<sup>4</sup> A to Z - Housing statistics and English Housing Survey glossary - Guidance - GOV.UK ([www.gov.uk](http://www.gov.uk))

can in principle contribute to an authority's housing land supply"<sup>5</sup>. 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.

- 1.3.6 Guidance for the Housing Delivery Test<sup>6</sup> 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, so this ratio is used in the HELAA when estimating capacity to give a "dwelling equivalent" figure.

#### ***Residential care homes***

- 1.3.7 The City Council has always counted housing for the elderly in its land supply if it consists of self-contained dwellings. The Guidance widened this in 2015 to include potentially non-self-contained rooms in C2 accommodation and requires that they be counted in the housing land supply figure. The ratio set in the Government's Housing Delivery Test of 1.8 is applied to give a 'dwelling equivalent' figure.

#### ***Economic sites***

- 1.3.8 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.

#### ***Office / Business Use***

- 1.3.10 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, to facilitate the growth of the high tech, knowledgeintensive sector.

#### ***Industrial Use***

- 1.3.11 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***

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5 Planning Practice Guidance: Housing and Economic Land Availability Assessment, Paragraph: 035

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1012931/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012931/HDT_Measurement_Rule_Book.pdf)

- 1.3.12 Other economic uses included in the assessment including those in Class E (Commercial, Business and Service) and Class F (Local Community and Learning) and 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 Needs Assessment**

- 1.4.1 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 Employment Land Needs Assessment (ELNA 2022 and 2023) considers the balance between the demand for employment land and the existing employment land supply. The findings of the ELNA have been used to inform the HELAA site assessments, such as updated information about landowner intentions and site capacities.
- 1.4.3 To reduce repetition in the HELAA, employment sites are included in Table A but are not listed in Table B because the details about the future potential capacity of employment sites is set out in the ELNA Employment Land Supply Capacity Tables (Appendix 1 of ELNA). Mixed use sites which include employment are however shown in Table B of the HELAA to set out the residential element of its capacity.



## 2 HELAA METHODOLOGY

- 2.0.0 This section sets out the methodology and key assumptions applied in the assessment. The Guidance sets out a suggested methodology for carrying out a HELAA<sup>7</sup>. This section sets out how the Government Guidance has been interpreted and applied to the Oxford context, also considering the Oxfordshire Joint Methodology.

### 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 Call for Sites was initially undertaken in 2021 to search for sites and has been open to submissions on an ongoing basis since then, and desktop sources of sites have also been reviewed (in accordance with the Joint Methodology). Sites suggested through stages of consultation on the Local Plan 2040, and also previously via the work on the Oxfordshire Plan 2050, have also been reviewed as additional sources of identifying sites.

#### Site size threshold

- 2.1.2 A site size threshold of 0.25ha has been applied for residential sites. Sites smaller than this will be taken into account in the windfall allowance calculation, so would not be counted in the HELAA capacity assumptions unless there is robust evidence to demonstrate that they can deliver a net gain of 10+ units, such as an extant planning permission, in which case they would be included in Table B. 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<sup>2</sup> of floorspace which is in line with the Guidance.
- 2.1.3 Appendix C lists sites which have been assessed in Table A as suitable/available/achievable for residential, but which are unlikely to achieve a net gain of 10+ dwellings. In some instances, the sites in Appendix C are below the 0.25ha threshold but were submitted during Call for Sites or consultation, so have been included in Table A for transparency. Others in Appendix C are larger than 0.25ha but for various reasons are unlikely to achieve a net gain of 10+ dwellings, this is often because there are existing residential uses on the site and there is unlikely to be sufficient capacity for any significant net gain. All sites in Appendix C would be counted as windfall instead if they are brought forward by the landowner with developments of less than 10 dwellings. Or alternatively, if it is demonstrated that they can deliver 10+ dwellings (e.g. a planning permission is issued) then they would be moved to Table B and counted as identified capacity in the HELAA.

#### Land types included or excluded in the HELAA

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<sup>7</sup> Paragraph: 005 Reference ID: 3-005-20190722

2.1.4 This section explains why different types of land are included or excluded from the HELAA search for sites. 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 desktop 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.

2.1.5 However if individual sites are identified through being an existing allocation or suggested by consultees or Call for Sites, then the site was included even if it is in an excluded designation or if it did not meet the site size threshold. This is to ensure transparency of process.

**Summary of land types included or excluded from areas of search**

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**

2.1.6 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 FZ3b according to the NPPF.

2.1.7 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, balancing 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 2036 Examination and has been reaffirmed by the Environment Agency as an appropriate approach to the preparation of LP2040.

2.1.8 The bespoke approach sets out that sites within Flood Zone 3 will be considered 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, so the policy prevents reuse of existing buildings in areas of Oxford at highest risk of flooding. The bespoke approach for Oxford however 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 relevant Local Plan policies set 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.

2.1.9 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. This HELAA takes into account the 2023 Environment Agency flood risk data and the 2023 Strategic Flood Risk Assessment for Oxford, to help inform the suitability of sites and the need for buffers or adjustments to the capacity of the site.

**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*

2.1.10 Consistent with the NPPF para 174 and 179, LP2036 and LP2040 seek 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.

2.1.11 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 for capacity 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**

- 2.1.12 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, and indeed LP2036 and LP2040 include site allocations for residential development on former-Green Belt sites. This HELAA also includes sites within the Green Belt in the assessment.
- 2.1.13 The majority of the Green Belt within Oxford City forms the river corridors of the Thames and Cherwell acting as floodplain. The river corridors run either side of the city, providing its characteristic form and enclosing its historic core. Many of these areas are also designated for nature conservation, and/or green and blue infrastructure network value. Because much of the Green Belt area in Oxford is Flood Zone 3a/3b then much of it is likely to be unsuitable based on flood risk irrespective of the Green Belt or other designations but have nonetheless been assessed in Table A to ensure a thorough assessment.
- 2.1.14 An updated Green Belt Assessment (2023) has been undertaken to inform LP2040. Green Belt parcels were not included in the assessment when they have intrinsic reasons for protection in addition to the Green Belt designation, which are because they are playing pitches or public open space (that had not been promoted with proposals for their replacement), of biodiversity value, are functional floodplain, or when the landowner has expressly said they would not develop the site. This means that few parcels were assessed: 9 sites (some of which are divided into smaller parcels) were reassessed to check the results from the previous (2017) Green Belt assessment were still applicable and up to date; and 10 new sites were assessed.
- 2.1.15 Nearly all sites in the Green Belt (2023) assessment were assessed to have a moderate-high or high negative impact on the Green Belt if they were to be removed. The negative impacts their removal would have on remaining Green Belt are not considered to be outweighed by the need for housing, therefore none of these sites are proposed for removal from the Green Belt in LP2040. Three of the sites (153a, 118 and 159) were found to make a low or moderate contribution to the Green Belt. However, the nature of these sites means that they are not being considered for a Green Belt review (see Table below).

Therefore, the intention is to propose no review of Green Belt boundaries in LP2040. (Note - Site 118 in the table below is now renamed in the HELAA to reflect that the Social Club has been redeveloped).

Site name and GB assessment conclusion	Comments	Conclusion
153-a Wildlife corridor at River Cherwell (moderate)	Site 153 is a long thin site adjacent to the River Cherwell, to the east of Summer Field School playing fields. For the purposes of the Green belt assessment it is divided into two parcels because of a variation in character. 153a was assessed as making a less important contribution to the Green Belt. However, the parcel is small and without clear access.	Do not consider review of Green Belt in this location.
118 Land rear of Wolvercote Social Club (low)	The majority of this site is not in Green Belt. A review of the Green Belt could not be justified to release the tiny amount of Green Belt within this site as it would not be needed to unlock the site and it would not itself deliver homes as it is too small.	Do not consider review of Green Belt in this location.
159 Wildlife corridor adjacent to Duke's Meadow (moderate)	This is a narrow strip of land adjacent to the railway and with no means of achieving access.	Do not consider review of Green Belt in this location.

**Summary: sites within Green Belt are included for assessment.**

### *Public Open Space and Open-Air Sports Facilities*

2.1.16 Public open spaces and private open-air 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, all of which are included within the assessment.

#### **a) Public Open Space**

2.1.17 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.”*

2.1.18 In addition, specified public open space sites in Oxford are protected by policies in the Local Plan. 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. Net loss of public open spaces 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 is discussed as part of the other green space categories below.

***b) Private open space***

- 2.1.19 Landowners of private open-air sports facilities (universities and schools) were previously contacted 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. This has resulted various private open space sites being identified as having some potential capacity for residential use in the HELAA and some also being given site allocations in LP2036 and LP2040.

***c) Outdoor Sports***

- 2.1.20 Outdoor sports facilities are protected in LP2036 Policy G5 and the draft LP2040 Policy G1. These policies protect against the loss of outdoor sports facilities but include criteria allowing for their development only if their loss can be compensated for. Many sports fields in Oxford are privately owned by the university 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.
- 2.1.21 The 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 (third generation) 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. Several of these sites are identified in the HELAA as having some capacity for residential use and have also been given site allocations in LP2036 and LP2040.

**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 92c, NPPF). In addition, Local Plan Policies provide protection against development of allotments. The policy does not allow for loss of protected allotments but it does not preclude re-provision, 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 LP2036 and LP2040 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).

- 2.1.29 To help deliver this, Local Plan 2036 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 as well-located. LP2040 takes this a step further to introduce a permissive approach to introducing an element of residential on employment sites where such development would not prejudice the employment or operational use of the site.
- 2.1.30 The Employment Land Needs Assessment points to continuing strong demand for employment land. The demand is primarily dominated by demand for office and R&D space, there is also a buoyant demand for industrial stock in the City. Oxford is in a strong position to be able to meet its employment land needs arising to 2040 in the city. This is through a locational strategy of intensification and modernisation of existing employment sites; the appropriate redevelopment opportunities to be delivered within the city and district centres; and without the need to allocate any significant new employment floorspace.
- 2.1.31 The HELAA has included all employment sites with the potential to deliver housing to ensure all land is considered. Each site will be assessed 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 is shown in the ELNA.

**Summary: Employment sites are included in the assessment.**

#### **Source of sites**

- 2.1.32 Sites assessed were drawn from the following sources to meet the requirements of the HELAA guidance and the Joint Methodology, the source is listed in the “How site identified” column of Table A:
- Sites were identified through a ‘call for sites’. In 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. The Call for Sites has also remained on the LP2040 consultation webpage since that time, and landowners could submit sites at any time since then. In addition, at the Regulation 18 stage consultation in 2022 it was checked with landowners for updates and they were asked if there were additional sites in their ownership which they wished to promote.
  - 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 extant planning permission, or a resolution to grant planning permission, or are under construction. Sites which have already completed in the period since 1 April 2020 (the base date of the HELAA and base date of the Plan) are



shown in Table A as completed, and the number of homes already delivered within the Plan period is shown in Table B. Sites fully completed in the years prior to 1 April 2020 (2016-2020) are not counted within the HELAA supply since they are outside of the LP2040 Plan period 2020-2040, and they are not considered to be 'available' in Table A as the development has completed so recently. The exception to this is if a landowner has specifically expressed an intention to further redevelop or intensify uses on the site during the plan period. These sites are not listed in Table B but for reference the 2022 iteration of the HELAA<sup>8</sup> includes a list of sites completed outside of the LP2040 Plan period.

- Planning refusals/withdrawn applications. A search for the relevant applications was made for the period since the last HELAA in 2022. Relevant applications prior to this would have been already included from the 2022 update;
- Lapsed permissions;
- Sites with a planning application being considered, or at pre-application stage. A search for relevant applications was made to cover the period since the last HELAA update in 2022. Pre-application discussions are confidential however we contacted relevant 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 ELNA as having potential for additional employment or housing; and
- All sites that were assessed in the 2022 HELAA Table A were reassessed.

2.1.33 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 124).

2.2.2 For those sites in Table B which have a site allocation in LP2040, bespoke site-specific analysis informs the capacity assumption which provides the most accurate and up to date information to inform the capacity assumptions. Only where there is no planning permission or site allocation, does the HELAA then revert to density typologies to inform the capacity assumption.

### Residential

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[https://www.oxford.gov.uk/downloads/download/788/housing\\_and\\_economic\\_land\\_availability\\_assessment\\_helaa](https://www.oxford.gov.uk/downloads/download/788/housing_and_economic_land_availability_assessment_helaa)

**Bespoke site-specific Capacities**

- 2.2.3 For sites allocated in LP2040 the number of dwellings in the policy has been taken as the indicative capacity, or if there is an extant planning permission in place then the capacity figure has been taken from the planning permission.
- 2.2.4 The work to inform the site allocations has already taken into account landowners' or site promoters' capacity assessments of sites where these were provided, for example planning applications or Call for Sites information. The site allocation figures were also informed by site-specific urban design assessments, which considered site constraints and opportunities in more detail to ensure the assumptions are based on the most up to date evidence for each site. See the background paper on Site Densities and Capacities. A small number of sites in Table B are listed with a capacity of zero, this is either because it is a hospital site with a site allocation supporting residential development but the health trust does not yet have firm enough plans to estimate a capacity that could be accommodated alongside the primary operational hospital uses for the site; or because the site allocation policy involves a grouping of several nearby HELAA sites but does not set out a split for the residential numbers across the sites pending more detailed design consideration. In those instances the HELAA apportions the entire policy number against one of the sites and correspondingly has zero against the other sites that fall within that site allocation area to avoid double counting.

**Density Bandings for HELAA Capacity Estimates**

- 2.2.5 For any sites which did not have either a site allocation or a planning permission then a density typology approach was applied. This reflects the density assumptions from the residential typologies in LP2036. Density bandings were then used to inform capacity assumptions for sites outside of those areas. The approach is based on four typologies of development and takes into account NPPF guidance about establishing sound density figures/standards (NPPF 124/5).
- 2.2.6 To develop the density bandings, 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 HELAA 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'.
- 2.2.7 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:

Development typology	Proposed density banding (units per ha.)
District centre	100-120
Gateway site	60-70
Suburban site	50-60

<b>Conservation area</b>	35-55
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- 2.2.8 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 site-specific information.

### ***Approach to Student Accommodation Capacity Assessments***

- 2.2.9 As per other residential development, the starting point for the capacity assessment for student accommodation was to use the capacity figure from the site allocation policy in LP2040 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) to provide a "dwelling equivalent" figure, whilst self-contained accommodation under Use Class C3 is counted as 1:1.
- 2.2.10 For sites where landowners' estimates were not given, average densities were worked out according to the residential development typologies, as described above.

### **Suitability of sites**

- 2.2.11 The Guidance states that a site's suitability for economic development should be assessed against the following factors:
- National policy 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 paragraph 018).
- 2.2.12 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.
- 2.2.13 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.
- 2.2.14 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**

- 2.2.15 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. For example land controlled by a developer or landowner who has

expressed an intention to develop may be considered available.

- 2.2.16 The conclusions about site availability were informed by a range of sources, for example through planning applications or informal pre-application discussions, through contact with landowners to confirm their intentions, and the Calls for Sites. Where a site was assessed as generally suitable for residential development but where there had been no recent engagement with landowner via the planning process then they were re-contacted directly to check the intentions. Where only part of a site is available then it is noted in the assessment table (Appendix A) such as for a mixed-use site, and the estimated capacity / dwellings figures (Appendix B) were adjusted to reflect that.

### **Achievability of sites**

- 2.2.17 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 020).
- 2.2.18 As with the approach for suitability and availability described above, where a site has either an extant planning permission (ie the landowner has within the last 3 years deemed the site to be viable to develop) or they have confirmed their intention to develop the site through engagement in the LP2040 process, then it has been assumed that the landowner deems the site to be viable for development and there is a reasonable prospect that the site will be developed, so it meets the achievability criteria. For remaining sites, the findings from the viability evidence for LP2040 has been applied. This evidence used a sample of sites of different sizes from various locations across the city and demonstrates that development which takes place in accordance with the Local Plan is viable across Oxford. This work concluded that almost all of the site typologies were viable.
- 2.2.19 Furthermore, in cases where a site containing residential development may be on the margins of viability, or unviable, the Local Plan policies in LP2036 and LP2040 are flexible in the approach to affordable housing requirements should robust evidence be provided by the applicant to demonstrate unviability. 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 for residential development or that they could be made viable by using the available flexibility in the policies.

### **Timescales**

- 2.2.20 Based on the Guidance, each site in Table B 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).
- 2.2.21 The timescales are informed by 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 paragraph 68). Sites are deliverable if there is clear evidence that housing completions will begin on site

in five years. 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.

- 2.2.22 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 the 2019 HELAA).
- 2.2.23 Due to the base date of the HELAA (and the Local Plan) being 2020, there are some sites in the HELAA which have already delivered some completions or are fully built out within the Plan period. These are still listed in Table A and Table B, but Table B clearly indicates the number of dwellings that have already been completed to ensure that they are not double-counted in the completions calculations. There are also some 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 of 2020 so those numbers are clearly indicated in a separate column in Table B.

## 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 or put forward by the landowner because they are too small (less than 10 dwellings). The urban nature of Oxford and high proportion of brownfield sites, means typically there is a substantial number of windfall sites of 1-9 dwellings each year, such as conversions to residential and infill developments.
- 2.3.2 Guidance states that a windfall allowance may be justified as part of anticipated supply if a local planning authority has compelling evidence. Any allowance should be realistic having 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. Despite wider economic factors such as Covid and Brexit, 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 and are likely to continue.
- 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, 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. The table below 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 (Completions from B56 Prior Approvals for sites of 10+ are not counted as windfall because they are counted in majors completions monitoring data instead).

- 2.3.6 The windfall calculation is based on the previous seven years of small sites completions data, from 2016/17, the start of the Local Plan 2036. These small sites completions figures include completions from C2 (student accommodation or care homes) developments where the equivalent residential number is 1-9 units, and also developments with B56 prior approvals where the number of units is 1-9.

**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	2022/23
1-9	258	49	101	83	61	172	86
Total windfall over 7 years = 810							
Average windfall per year = 116 (810/7)							

- 2.3.7 The average annual windfall figure is 116 units, which includes garden land and sites of 1-9 units (including B56 sites of 1-9 units and small sites of student accommodation of less than 25 rooms). Whilst larger windfall sites do also come forward in the city, these have in recent years been largely from student accommodation as well as from B56 permissions for conversions of offices to residential (such as Former Nielsen House conversion). The B56 permissions have been included in Table B and the capacity counted in the HELAA supply, so they are not counted in the windfall. LP2036 and draft policies in LP2040 concerning student accommodation are restrictive about their suitable locations and occupiers and end occupiers, with extensive work undertaken to understand the needs and intentions of the universities and to identify sites for student accommodation. As a result there is not expected to be significant numbers of windfall student accommodation schemes coming forward.

**Conclusion on estimated windfall supply in Oxford**

- 2.3.8 Based on the analysis of past completion rates in Oxford, the annual windfall allowance to be included in this HELAA is 116 units per annum.
- 2.3.9 Windfall housing has not been counted for 2020/21, 2021/22 or 2022/23 in the overall capacity calculation because completions data is available for those years of the plan period instead. Windfall has also not been counted for three years ahead, ie the current year 2023/24, and 2024/25 and 2025/26. This in order to avoid double counting with minor commitments from planning permissions.
- 2.3.10 Therefore, an allowance has been included for windfalls for years 7 (2026/27) onwards, giving a total anticipated windfall over the plan period of (116x14 years) 1,624 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 capacity calculation for the plan period 2020-2040. 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 will be published as part of the Regulation 19 in Autumn/Winter 2023 for landowners, developers and agents to review. In addition, landowners have been engaged in the site allocations process, including proposed uses for sites and indicative capacities.

## 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 Employment Land Needs Assessment considers the current stock of employment land in Oxford and should be referred to for more detail about employment sites capacities, or where applicable updated information in the ELNA.

# 3 SITE ASSESSMENT SUMMARY

- 3.0.0 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.
- 3.0.1 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.

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).

### Summary of development potential

- 3.0.2. This HELAA assesses 479 sites. The housing capacity from sites identified as suitable, available and achievable and capable of delivering 10+ net dwellings is 5,870 (Table B identified capacity 2020-2040). A 10% discount is then applied to this figure as a buffer to account for potential non- delivery of identified sites: This is a proportionate approach in a constrained city with a capacity-based housing requirement. Table B also lists the completions for the 2020/21

and 2022/23 monitoring years, ie completions within the LP2040 Plan period from sites in Table B.

- 3.0.3 In addition there is an estimated contribution to the housing supply from minor commitments (small sites <10 dwellings, with planning permission) of 272, and from windfall sources of 116 dwellings per year (2026/27 to 2039/40) to the HELAA supply calculations.
- 3.0.4 The total housing supply identified for 2020-2040 is therefore 9,612 dwellings for the Local Plan period 2020-2040 (including a 10% buffer).

3 years completions within the plan period (2020/21, 2021/22, 2022/23)	1,846 (inclusive of 1,529 majors and 317 minors)
HELAA Table B sites (major commitments and draft allocations)	5,870 (minus 652 for 10% buffer)
Minor commitments (2023/24, 24/25, 25/26)	272
Windfall (116 x14 years (2026/27 to 2039/40))	1,624
<b>Total capacity 2020-2040</b>	<b>9,612 (including 10% buffer)</b>

- 3.0.5 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.
- 3.0.6 The timescales presented in Appendix B are an indication of when each site is likely to come forward for development during the Plan period.
- 3.0.7 Sites that are expected to come forward with an economic element have not been listed in Table B nor have they explicitly been assigned to a timescale, because all of this analysis is covered in more detail in the ELNA so it is not repeated here in the HELAA. For mixed use proposals where it is expected that the employment floorspace would be delivered in parallel with housing and other uses the residential capacity is included in Table B, for the economic capacity see the ELNA. For more background about the employment sites generally see the ELNA.



## **MAPS 1-3: MAPS OF ALL SITES ASSESSED**

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

## 4 CONCLUSION

- 4.0.1 This 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 The assessment of sites in the HELAA 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. This HELAA has taken a rigorous approach to identify all development potential and there has been ambitious presumptions that sites can be delivered even where there are significant constraints identified, 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. As such it is not expected that every single 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, which is why the 10% buffer has been applied.

## **Appendices**

**Appendix A – All sites assessed**

**Appendix B – Sites with development potential**

**Appendix C – Sites with capacity less than 10 dwellings**