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*Specialist Housing
Need*

**Oxford Local Plan
2040**

**BACKGROUND
PAPER 5**

This topic addresses

SA Objective: 4. To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home.

SEA Objective 12. To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector

SEA Theme: Population and material assets.

1. Introduction

1.1 This Paper considers the need for and policy response to various types of specialist housing accommodation. The global housing need is considered in BGP1, but in addition we are required to consider the needs for particular types of housing and occupants. Affordable housing need is discussed in BGP2. This paper focuses on student accommodation, self-build and custom build homes, elderly person and other specialist accommodation and gypsy and traveller accommodation.

2. Policy Framework

NPPF, PPG

2.1 The NPPF requires Local Authorities to consider a full range of housing need within their assessment of local housing needs. Paragraph 62 states that ‘...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.’

2.2 Paragraph 04 (reference ID 2a-021-20160401) of the Housing Needs of Different Groups Planning Practice Guidance (PPG) published in July 2019 states that; “Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.”

2.3 Paragraph: 004 Reference ID: 67-004-20190722 of the NPPF allows for student accommodation to be counted towards the housing requirement for a district, based upon

the amount of accommodation it releases from the housing market: “All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.” As well as making plain the need for Local Planning Authorities to consider student accommodation within the wider housing context, the NPPF also requires authorities to liaise with the relevant universities where a policy cap or restriction is proposed (as has been the case in Oxford City Council).

2.4 The final bullet point of paragraph 017 (reference ID 2a-021-20160401)⁴ of the Housing and Economic Needs Assessment Planning Practice Guidance (PPG) published in February 2019 states that: “Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider 3 options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Plan makers should engage with universities and other higher educational establishments to better understand their student accommodation requirements.”

2.5 National planning policy makes it clear that planning authorities should plan positively to meet a full range of housing needs. The *Self-Build and Custom Housing Building Act 2015*¹ (as amended by the *Housing and Planning Act 2016*²) defines Self-build and Custom Housebuilding as “*the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person*”.

2.6 The Council is required to keep a register of individuals and groups of individuals who are seeking to acquire serviced plots of land in their area to build homes for those individuals to occupy. The Act requires relevant authorities to “*keep a register of a) individuals, and b) associations of individuals, who are seeking to acquire serviced plots of land in the authority’s area for their own self-build and custom housebuilding*”. The requirements of the register are set out in the *‘Self-build and Custom Housebuilding (Register) Regulations 2016*³. The Act also requires relevant authorities to publicise its register.

[3. Feedback from consultations](#)

3.1 A range of comments in relation to this topic were received in response to the Regulation 18 part 1 and part 2 consultation (Preferred Options). Oxfordshire County Council do not accept that the HENA correctly reflects the scale of specialist housing need. Some questioned the validity of trying to rely on student data taken during the Covid lockdown. There were a wide range of different views on student accommodation. Some said that the presence of the universities and their cultural contribution is important and should be acknowledged. The importance of the universities meeting their targets to house students was noted by several people. There was general support for continuing to limit the location of student accommodation, although some said the policy approach was too limiting and restricted the universities from meeting their student housing needs. Others considered there was no need for the restriction for graduate accommodation.

4. Likely trends without a new local plan

Student accommodation

4.1 Without a new local plan, policy H9 and H10 of the Oxford Local Plan 2036 could begin to be considered out of date as the thresholds have not been re-based. The policies help ensure the impacts of student accommodation are well managed.

Self-build and custom build

4.2 Without a new local plan, the *Self-build and Custom Housebuilding (Register) Regulations 2016* would still apply and there would be a requirement for the City Council to keep the Self-build and Custom Housebuilding Register. Whilst this would help gauge an idea of the level of demand for Self-build and Custom Housebuilding, without an up-to-date local plan there would be no policy framework and demand for this type of housing may not be met.

4.3 With the cost-of-living increases and ongoing affordability issues for housing in Oxford, the loss of a policy that is supportive of this type of housing could result in individuals and organisations seeking to build/ develop this type of housing outside of the city boundary. Therefore, the potential contribution to the overall housing provision that could come through this route would be constrained.

Elderly persons and other specialist housing

4.4 In the case of other specialist housing, the policy approach is to set criteria for where this is suitable and to ensure it is a good living environment. This policy adds clarity in terms of what is expected, smoothing the application process and ensuring high-quality applications. Without the policy approach, there would be less clarity for applicants and those making decisions on planning applications.

5. Student Accommodation

Background

5.1 Oxford is a world-renowned brand for educational excellence, principally because of the historic University of Oxford and also due to the highly respected Oxford Brookes University. It is as a result of this reputation that Oxford derives much of its high profile and prosperity.

5.2 This success also creates many pressures in the city. Oxford's reputation attracts tourists, language students, publishing businesses, spin-out university enterprises and medical research. The city also has students studying at other institutions, and a number of short-term students who visit the universities and language schools. It means there are significant numbers of students requiring accommodation.

5.3 In Oxford at the point of the 2011 Census, there were 29,924 full-time students aged 18 and over. This had increased by 10% in the 2021 Census to a total of 32,888 full-time students. This equates to around 20% of the City's population. In the 2021/22 academic year there were 27,290 students in total at the University of Oxford (compared to 24,510 in 2019) and 17,470 students in total at Oxford Brookes (compared to 16,673 in 2019).

5.4 Oxford has several language schools that attract students from all around the world. Courses at these institutions vary from part-time and full-time, from one-off courses to month-long courses and longer. The number of students at these institutions is therefore highly variable and particularly seasonable. [The Oxford Student Needs Study \(Iceni, 2023\)](#) estimated that, based on the 11 language schools assessed, during the peak week of enrolment there were 1,984 students studying languages in Oxford. There are also five Further Education Colleges. These are institutions that offer any study after secondary education that is not part of higher education (i.e. that is, not taken as part of an undergraduate or graduate degree). Courses range from basic English and Maths to Higher National Diplomas.

5.5 Because the majority of language school courses are only a few weeks this means the accommodation need is for temporary accommodation rather than any kind of permanent accommodation. Most of this need is met and will continue to be met through homestays with families and in student accommodation not otherwise in use over the summer months. Many of the further education colleges in Oxford serve the existing residential population, so students more often than not live in existing residential households either as part of a family unit or independently. Several of the institutions do already have accommodation for students who do have an accommodation need. The Oxford Student Needs Assessment (Iceni, 2023) therefore finds no significant need for additional student accommodation for students at institutions other than the universities over the plan period.

Overall approach to managing the impacts of student housing need

5.6 The approach of the Plan is to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts they may have, on established communities and on the housing market. Development of student accommodation restricts the supply of land available to deliver market and affordable housing.

5.7 The demand for student accommodation places two main forms of pressure on the local housing stock:

- students accommodated directly in private rented housing; and
- from student accommodation being developed on sites that may equally be suitable for other types of housing

5.8 These pressures on the local housing stock act to increase rents, worsening affordability, and also mean that sites that might otherwise deliver onsite affordable housing may come forward for student accommodation that does not deliver any onsite affordable housing.

5.9 An additional consequence where there is a high proportion of students can be the perceived or actual harmful impacts on the host community or neighbourhood. A concentration of student halls can mean that they dominate an area, meaning a high proportion of transient occupants in an area, and an established community that becomes more fractured and less strong.

5.10 A policy approach is needed to manage the pressures of students in the best way, while recognising and responding to the forecast needs of educational institutions that have a housing need (predominantly the universities). There is a balance to be struck between encouraging students into halls because it frees up family housing, and limiting student halls because they take up new sites that could be used for new family housing. Hence, we limit the over-concentration of HMOs, only allow student accommodation in the most suitable locations and encourage universities to provide accommodation (in these locations) through the thresholds policy.

Linking new academic facilities with the adequate provision of student accommodation (Policy H10)

5.11 Policy H10 links new or redeveloped academic accommodation to the delivery of associated residential accommodation. The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. In the case of the universities, this may be demonstrated if they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements such as teaching and nursing students and post-graduates on research-based courses. This longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market. In particular, the policy approach is designed to balance the needs of the student population as well as local residents.

5.12 If the threshold for either university is breached, that university is prevented from gaining planning permission for new academic facilities that create additional capacity for students. There have been and will continue to be applications for facilities where the argument has been made and accepted that the development is unrelated to student numbers and so the thresholds are not relevant.

5.13 This policy has operated effectively since the introduction of the 1991-2001 Oxford Local Plan (adopted 1997). That plan recognised that students have particular housing needs and that the institutions have some responsibility for housing their students in purpose-built student accommodation. It recognised that purpose-built student accommodation can have the least impact on the availability of housing to long-term residents of the city. Policies HO26 and HO29 sought to restrict the numbers of students living outside of university accommodation to 4,000 at the University of Oxford and Oxford Brookes respectively. The 2001-2016 Local Plan found lower thresholds to be achievable and also introduced the link to academic accommodation. Policy ED.6 set a threshold for Oxford Brookes of 3,500 up to 2008 and 3,000 after that date. Policy ED.8 set the same threshold for the University of Oxford. The approach was continued in the Core Strategy Policy CS25, which set a threshold of 3,000 for each university, and continued in the Oxford Local Plan 2036, with current thresholds of 1,500 at the University of Oxford and 4,500 at Oxford Brookes (applied to a narrower range of students than previously, that excludes research-based students)

5.14 The PPG makes it clear that these caps or restrictions can be considered if other options won't support the needs of the student population and local residents and if there is understanding of the accommodation needs of universities and other higher education establishments (Paragraph: 004 Reference ID: 67-004-20190722). Care has been taken to understand the accommodation needs of the universities when setting the thresholds. The Oxford Student Needs Assessment 2023 (Iceni) used various sources of data to understand the current situation. To assess student accommodation needs over the plan period to 2040 they gathered information about what sites are in the pipeline and what the universities' growth plans are.

5.15 The accommodation needs of students vary greatly. Different types of institutions have different needs (as outlined in the background section, many language school students, for example, come for short stays and are often in homestays or student halls that are vacant during the summer). However, even amongst university students, there is a variation in the type of accommodation that is needed. Clearly student halls are not the answer for every student, and there will always be students living out. Some students may already live in or near the city at home, and they do not need accommodation. Some post-graduate students could be studying for many years whilst also working at the university and student halls are not the most suitable accommodation for them. Therefore, the policy focus is on students studying full-time on taught courses (so this excludes post-graduate research students and students on vocational or sandwich courses whilst they are working).

Setting the thresholds

5.16 To set thresholds going forward, we need to predict how much student accommodation there will be and how many of the types of students with accommodation needs there will be over the relevant period. The profile of students and student numbers are always evolving. Icenl were commissioned to carry out the Student Needs Accommodation Assessment 2023. This looked at the current profile of students and used information from the universities to forecast it going forward. Setting the threshold (and monitoring the policy) requires an understanding of the number of students requiring university accommodation (according to the definition in the policy, which is full-time, taught course students) against the number of students living in university-provided accommodation.

5.17 Both universities have predicted a growth in student numbers, which we need to respond to. It is difficult to be certain over the longer term in respect of the future recruitment of students. Factors that can influence this may be within the institutions' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. government policy, macro-economic situation). Both universities felt unable to accurately forecast at all beyond 5 years. Therefore, a threshold has only been included in draft Policy H10 to 2028.

University of Oxford threshold calculation

5.18 The Student Needs Assessment, using information from the University of Oxford, predicts 17,709 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2040) in 2028, using the high growth scenario. The accommodation assumption is that there will be the same amount as there is currently in 2028, so no assumption has been built into the threshold about the pipeline supply coming forward before 2028. The current supply of student rooms from the University of Oxford is 16,453 student rooms.

Oxford Brookes threshold calculation

5.19 The Student Needs Assessment, using information from Oxford Brookes, predicts 11,891 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2040) in 2028, using the high growth scenario. The accommodation assumption is that there will be the same amount as the current situation. During this time period, some of Oxford Brookes's nomination rights on third-party purpose-built accommodation will expire. Oxford Brookes has said they may not renew these nomination rights. However, they also consider that they have enough information from students to know if they are living in this kind of purpose-built accommodation. There is therefore a slightly different wording for Oxford Brookes as compared to the University of Oxford (who have said they do not have this information) about the accommodation that can be considered to be meeting needs against the threshold, to enable this accommodation to be counted. The current amount of supply without

nominations is 3,069 student rooms, with an additional 2,000 living in other purpose-built accommodation (with or without nomination rights). The threshold has increased since the Oxford Local Plan 2036. The increased threshold is largely a function of the anticipated growth in student numbers; however, the gradual loss of their accommodation at Harcourt Hill and Wheatley has also had an impact over time

Student accommodation location policy (H9)

5.20 Purpose built student accommodation is not suitable in all locations. The intention of Policy H9 is to ensure student accommodation is prevented in locations which are not suitable or desirable for students to live. The most suitable locations are on existing university sites where there is no conflict with other housing types.

5.21 The locational restriction also recognises that it is important to locate student accommodation in a way that avoids unacceptable changes in character and great increases in activity along quieter residential streets. The proposed restriction means that student accommodation can be delivered only on or adjacent to existing campuses and within the city centre and district centres. These locations are particularly suited to absorbing student accommodation and the levels of activity associated with it. Campuses and sites adjacent to them are suitable because everything is on hand for students and they are not affecting an existing residential area. District centres and the city centres are suitable locations because student accommodation is suited to being on the upper floors, for example above retail and also because it means students will be located in accessible locations where public transport is available to key campus sites. Furthermore, the policy will prevent the domination of student accommodation in established residential areas and will help to maintain the quieter residential character and amenity of these streets and prevent complete domination by student accommodation.

6. Self-Build and Custom Housebuilding

Background

6.1 This paper sets out the context for Oxford's circumstances around Self-Build and Custom Housebuilding, and the evidence and explanation that has helped to inform and shape policy H14 in Chapter 2: A Healthy Inclusive City to Live In.

6.2 Oxford's communities are varied, with differing needs for housing provision. With affordability issues, self-build and custom housebuilding can provide opportunity for individuals and groups to access the housing market a different way.

6.3 Sections of the paper are set out to identify the wider planning policy context relating to self-build and custom housebuilding, the existing local situation, including an overview of the level of demand for these types of housing; feedback from the OLP2040 Regulation 18 consultation; the likely trends without a new local plan and a discussion of the justification of the policy in the draft Oxford Local Plan 2040.

6.4 Oxford City Council has had a Self-build and Custom Housebuilding Register in place since 1 April 2016. Inclusion on the Register does not confer any form of entitlement in terms of the provision of serviced plots. Rather, its purpose is to provide local planning authorities with demand data that they can use to understand and plan for the future need for this type of housing in their area. Authorities may, at their discretion, advise people on the Register of relevant proposals for development. Additionally, authorities are expected to meet the level of need indicated by the Register, by permitting an equal number of serviced plots within the following three years to the number of registrations that are made over the preceding three years. This is a rolling requirement, running from the end of October each year.

Oxford Local Plan 2036

6.5 The *Oxford Local Plan 2036 (OLP2036)*⁴, adopted in June 2022 is the current development plan for the city and sets out agreed planning policies for the city against which decisions are made. Policy H7 in the OLP2036 seeks to help encourage sufficient self-build and custom housebuilding to come forward and to support community-led housing. The policy approach is to set a threshold for self-build plots on residential sites. The policy requires 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. The policy also sets out expectations of what plots should have, including services, and access to the public highway. In addition, the policy requires the use of a legal agreement to ensure that self-build plots that have not sold after 12 months of marketing be built and bought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.

6.6 In July 2022, following public consultation and updated government guidance Oxford City Council adopted a Local Connection Test to the Self-build and Custom Housebuilding Register to help understand the local demand for this type of housing within the city. This connection test splits the Self-build and Custom Housebuilding Register into two parts to provide a differentiation between those people with a local connection to the city (Part A) and those without (Part B).

Current situation

6.7 Since its introduction in 2016, there have been 136 registrations on the Self-build and Custom Housebuilding Register (as of 17/10/23). As at 11.10.23, there are only 3 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register. Analysis of the addresses of those on Part B of the register suggests that a further 73 of the individuals who expressed an interest in Self-build and custom housing building, cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand.

6.8 The constrained housing land supply in Oxford together with the limited availability of greenfield sites and the typical nature of residential development sites in Oxford, means that in many developments it is not feasible to accommodate self-build plots. For example, in high density flatted developments, in office to residential conversions, in student accommodation developments (also typically flatted), or in employer-linked developments. The types of sites which tend to be more suitable for self-build plots are the larger sub-urban and typically greenfield sites – of which there are few in Oxford. However, proposals for community led and self-build/custom housing are being supported on appropriate sites. Since the adoption of the current Local Plan (OLP2036) there has been one development proposal that includes the provision of self-build plots. This is St Frideswide Farm (21/01449/FUL), a development of 134 homes, 5 of which are self-build. This development commenced in 2023.

6.9 To inform the OLP2040 policy, an exercise has been undertaken to establish whether there is an adequate supply of sites with potential to accommodate self-build housing. Table B of the *Housing and Employment Land Availability Assessment (2023)* sets out those sites which have met the HELAA criteria and have development potential. Of those sites with development potential, the sites with capacity for at least 100 dwellings, that have not already been built out, or that do not yet have the benefit of a planning permission, have been reviewed for suitability for self-build. Sites that are expected to come forward as either flatted schemes, or as student accommodation (also typically flatted), or as employer-linked housing (for example the JR Hospital site) have been excluded as these would not be feasible for self-build plots to be incorporated into a scheme. For sites expected to come forward as mixed-use development, the proportion of the site expected to be developed for residential use has been calculated.

6.10 The review of the HELAA sites suggests that there are five sites in the city that could come forward where it would be feasible to include an element of self-build housing. These sites are as follows:

| HELAA Ref. | Site Name | Total Site Size (hectares) | Proportion anticipated for Residential (hectares) | Minimum No. Of dwellings estimated |
|------------|-----------|----------------------------|---|------------------------------------|
|------------|-----------|----------------------------|---|------------------------------------|

| | | | | |
|--------------|--|------|---|------------|
| | | | | |
| 018 | Diamond Place and Ewert House | 1.73 | 1.0 (mixed use - discount student accommodation element) | 100 |
| 028a | Kassam Stadium and Ozone Leisure Complex | 8.48 | 6.48 (mixed use - discount commercial/employment elements) | 275 |
| 113 | Redbridge Paddock | 3.64 | 3.64 | 200 |
| 289 | Sandy Lane Recreation Ground | 4.6 | 4.6 (No discount applied for outdoor sports facilities) | 300 |
| 590 | Pear Tree Farm | 2.03 | 2.03 | 122 |
| Total | | | 17.75 | 997 |

6.11 On the basis of the of the sites listed in the Table above, there is an anticipated 17.75ha for residential development where it could be feasible to incorporate self-build homes into the development. These sites cumulatively are expected to deliver around 997 dwellings in total.

6.12 The OLP2036 self-build policy requires that for sites with potential for over 50 dwellings, 5% of the site area should be made available as self-build plots. From the exercise above, it is believed that this threshold should be increased to sites with potential for over 100 dwellings. The reasoning for this is that 5% of 17.75ha could deliver 0.89ha of land for self-build homes. Applying a 50 dwellings per hectare assumption, as the sites are predominately suburban, this would equate to around 44 self-build plots. As a cross-check, if the calculations are run based on the number of homes expected from these sites, then the application of the 5% threshold would result in an anticipated 50 self-build plots (5% of 997 = 50).

6.13 In terms of demand, there are 3 individuals on the Self-build and Custom Housebuilding Register that have demonstrated a local connection, so there is an adequate supply identified in the table above, to meet this local demand and also with additional potential supply to address further demand in the event that some of the people with the local address on Part B of the Register, were to come forward to provide evidence of local connection to meet the requirements of Part A of the Register.

Feedback from consultation

6.14 At the Issues stage of consultation (2021) the comments were about housing more broadly, reflecting the stage that the plan preparation had reached at that time. It did not discuss more detailed issues such as Self-build and Custom Housebuilding.

6.15 The Autumn 2022 Preferred Options Regulation 18 (Part 1) consultation explored these views in more detail, comments relating to Self-build and Custom Housebuilding and Community-led housing covered a range of issues. Whilst there was general support for the preferred option of a Self-build and Custom housebuilding policy requiring a proportion of housing on large sites to be self-build plots, there were comments about whether this is viable in the city; suggestions that the 12-month sales period should be reduced as it is possible that certain thresholds of development may be completed sooner; comments made in relation to the feasibility of sites delivering self-build; comments in relation to needing to have a robust understanding of supply; comments that the delivery of self-build plots can be difficult, and that suggestion that the interface with other policies needs careful consideration. Those who did not agree with the Preferred Option made comments that included concern that there will be delivery difficulties on some sites; that a need for self-build homes should not automatically lead to a requirement, but should instead encourage their provision; that so many sites in Oxford are small that it would be more effective to complement this approach with small site allocations; that there is no reason to support self-build at all/ it's only good for co-operatives; it's not good if it lowers density; and that this type of housing is not suitable for all development types.

6.16 For community-led housing, there was general support for the Preferred Option (that there be no specific requirements), with comments that community-led housing is vulnerable to viability agreements; that there should be no relaxation of standards or requirements of any housing type and that community-led housing must deliver the same standards as all other housing; and that city council land should be considered for its community-led housing potential. Some did not agree with the preferred option but were supportive of the alternative policy's commenting that a policy could support greater densities, support communal facilities and support more sustainable living; whilst others commented that suitable site size thresholds will be the key to ensuring delivery success and that the requirement should be for all sites not just large ones; that the preferred option should be a combination of options. Those that did not agree with the preferred option commented that the policy does not go far enough and needs to require provision of community-led housing.

6.17 The 2023 Preferred Options Regulation 18 (Part 2) consultation focussed on the HENA and the housing need calculations, so comments in that consultation were not directly relevant to Self-build and Custom Housebuilding.

Conclusions

6.18 The evidence above demonstrates there is a case for continuing our existing threshold-based approach for the number of plots that should be made available for self-build and custom housing within larger development sites.

6.19 As stated above the current Local Plan policy sets a threshold for self-build housing on residential sites, requiring 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. It is considered that this threshold could be increased to residential sites with capacity for 100 or more units which as demonstrated above, offers the potential for around 50 plots for self-build housing to come forward over the plan period. As only 3 people have been added to the local register since it was started in 2021, demand for this type of housing is considered to be low. Whilst demand may increase over the plan period, it is believed that the potential supply is adequate.

6.20 The emerging policy continues to include expectations of what plots should have, including services, and access to the public highway. It also includes a requirement for a legal agreement to help ensure the take up of self-build plots. The threshold for this has been reduced from 12 months to 6 months.

6.21 The policy also includes a 6-month marketing period for the take up of the self-build plots. This threshold has been reduced from that in the current policy (12 months) to help ensure that sites are not held up for delivery, which can impact on viability and delivery of new homes. Local examples of self-build have also indicated that the way that planning permission is sought for the overall scheme can also help to support delivery of self-build plots and avoid delays (although this is not prescribed in the policy). It can help to avoid delays if planning permission is dealt with for the site as a whole, including the self-build plots, then simply excluding them from construction. Then in the event that they are not sold during the required marketing period, construction can swiftly be commenced in accordance with the extant permission. The alternative process of proceeding with a hybrid permission which postpones dealing with self-build plots until subsequent Reserved Matters applications could lead to unnecessary delays in building out the self-build plots in the event that they are not sold for self-build projects, which can impact on phasing and in turn affect viability and delivery of community benefits such as affordable housing.

7. Elderly persons and other specialist accommodation

7.1 Older people are another identified group in the NPPF with specific housing requirements. Nationally, the population is ageing and whilst Oxford has a younger than average age profile of residents, it is important to ensure that the needs of older people are considered.

7.2 Specialist housing for older people is provided in a range of formats and can include:

- Age-restricted general market housing, generally aimed at those over 55, potentially with some shared amenities but without on-site support or care services;
- Sheltered housing, typically purpose-built flats with some communal facilities, a warden and some support such as on-site assistance via alarm;
- Enhanced sheltered housing/assisted living, which will have additional services to enable people to retain independence such as some meals provided;
- Extra care housing, which has access to medium to high level of care with 24-hour access to support services and registered care staff and meals available; and
- Residential care/nursing homes, for those with a high level of dependency and which have rooms within a residential building and provide a high level of care for daily living.

7.3 The Housing and Economic Needs Assessment looked at the need for specialist housing accommodation. It did not look at the need for age-restricted accommodation because the right level of this housing type is effectively determined by the market. The assessment looked at the current supply of market and affordable housing with support and with care. Older persons' needs were modelled by applying a 'prevalence rate' to projected demographic results. The prevalence rate looks at the number of units/bedspaces required per 1,000 head of population aged 75 based on the proportion of people in this age group who could be expected to live in different forms of specialist housing. The population aged 75 and over is used in the modelling, but the estimates of need include people of all ages. Prevalence rates were selected based on the understanding that Oxfordshire County Council would like a shift away from residential care towards extra care. It also found a need for better quality provision such as care homes with en-suite facilities and of a size which is commercially viable to run, which is taken as 135 units.

| | Tenure | Overall need |
|-----------------------------------|---------------|---------------------|
| | | |
| Housing with Support | Affordable | -270 |
| | Market | 929 |
| Housing with Support Total | | 659 |
| | | |
| Housing with Care | Affordable | 165 |
| | Market | 702 |

| | | |
|--------------------------------|--|------------|
| Housing with Care Total | | 867 |
| | | |
| Residential Care | | 26 |
| Nursing Care | | 39 |
| Care Bedspaces | | 65 |

7.4 This shows that there is no overall need for additional affordable housing types of specialist accommodation. Although there is a need for affordable housing with care, this is counterbalanced by the apparent over-provision of affordable housing with support, which if provided in a different format could meet need. Instead, the focus should be on delivery of market accommodation.

7.5 In the case of market accommodation, it is expected that the market will respond by bringing forward specialist housing types, if there are sites to bring it forward. All types of specialist accommodation have a moderate need, although there is limited need for nursing and residential care. The policy approach is to set criteria for assessing proposals that come forward.

7.6 Many sites are potentially suitable within the given criteria of Policy H13. Consideration was given to other approaches, such as requiring a certain proportion of sites to provide specialist accommodation, or requiring it as part of the affordable housing provision. However, this kind of accommodation can only feasibly be provided at scale. 135 units is considered roughly what is needed to make it feasible to run, because there are enough units to support the amount of specialist features, care facilities and servicing (such as cooking, cleaning and laundry) that are needed. This could not be provided as a small proportion of any site in Oxford and will only realistically come forward if a landowner is interested in using the site, or a fairly large portion of one of the larger sites, for this use. Given that the need is for market accommodation, this is considered the most appropriate policy response.

7.7 The criteria set out in Policy are intended to ensure accommodation is well design and located so it is suitable for residents' needs and does not create traffic implications. It is important it is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

7.8 Another aspect of Policy H9 is that existing extra- care accommodation should be protected unless it is to be replaced elsewhere or unless it can be shown that it is surplus to requirements. Given that there is additional need for this accommodation over the plan period, and limited sites where it can be delivered, this is important, and existing sites offer potential for intensification, which may also help to meet needs.

[8.Gypsy and Traveller needs](#)

8.1 The [Gypsy, Traveller and Travelling Showpeople Accommodation Assessment](#) (ORS, 2017) that informed the Oxford Local Plan 2036, and remains the most up-to-date evidence base on this issue. It was jointly commissioned by the Oxfordshire districts except West Oxfordshire. The Oxfordshire districts (including West Oxfordshire) have commissioned a joint new assessment of this need. However, this study is not yet complete. Nevertheless, the information from the 2017 study is enough to suggest that there will be no need for this type of accommodation in Oxford over the new plan period.

8.2 The GTAA assessed the need for provision of Traveller pitches and plots in five year increments covering the periods 2017 to 2031/33/36 in accordance with the Councils' Local Plan periods. As well as identifying current and future permanent accommodation needs, it also seeks to assess any need for the provision of transit sites or emergency stopping places. Based on national guidance, the study used a variety of sources of information to help identify need, including stakeholder engagement, census data, records of encampments, planning applications, enforcement information and caravan counts.

8.3 In the 2017 study there were no Gypsy or Traveller households identified in Oxford City, which means there, meaning there was no current or future need for additional pitches. There was one Travelling Showperson household identified in Oxford City, living in bricks and mortar. There is no current or future need for additional plots. There has been no change in this situation since 2017, so it is very much expected that the new study will find that there continues to be no need for this type of housing in Oxford.

8.4 Local Authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, '[Planning Policy for Traveller Sites](#)' also notes in Paragraph 11 that: Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community. This is the approach that has been taken in drafting Policy H11.