Part A: Housing Policies
Section A1
Introduction to Housing Policies

Introduction

A1.1 The first part of this Preferred Options document looks at how Oxford City Council is likely to review the Local Plan policies that guide residential development. The new policies will be used to determine planning applications for new residential development. They will replace all of the policies in Section 7.0 – Housing of the Oxford Local Plan, and will update some saved policies elsewhere in the Local Plan.

A1.2 Part A therefore sets out options for how the City Council might approach a range of issues in managing residential development of all types and sizes. This includes specialist forms of housing that are common in Oxford, such as student accommodation and houses in multiple occupation (HMOs) as well as single household houses and flats.

A1.3 Most of Part A sets out two or more options for how we might write a new policy on that area. One of the main policy options is identified as a ‘preferred option’. The preferred option is the one currently favoured by the City Council. However, alternative options are set out alongside the preferred option, which the City Council would still consider, depending on the outcome of this consultation. Many of the sections below also set out a ‘rejected option’, which the Council considers conflict with the aims of the Core Strategy or with the wider best public interest.

Pre-Options Public Consultation

A1.4 In November and December 2010, people were encouraged to come along to consultation events held in 5 sessions across the city. We wanted to give people a chance to have their say, and there were a number of ways they could comment at the events. To stimulate thought and discussion we had some introductory boards that listed questions to think about, for example should the affordable housing threshold be changed; should we be giving more, or less, priority to allocating land for student accommodation; is the aim of achieving excellence in sustainability more or less important than providing affordable housing? These boards also gave background information to ensure people were aware of constraints and parameters, for example high level strategic planning policies already in the Core Strategy, the influence of other strategies, policies and statutory bodies and the importance of being able to deliver.

A1.5 To help people comment on housing issues, five boards were set up giving an overview of issues with ‘thought bubble’ spaces where people could add their thoughts using post-it notes. There was also a facilitated housing discussion table. Displayed on this table were charts showing local ‘characters’ representing the communities of Oxford, expressing views on the issues by way of speech bubbles. People could place coloured dots to show whether they agreed or disagreed with these views, and use post-it notes to add their own thoughts.

A1.6 In February 2011, the full results of the consultation were published on the City Council’s website as a consultation report. Reference should be made to this to see the details of people’s thoughts and comments on the issues. In the sections below, an overview of comments made in response to each issue is reported.
Objectives of the Housing DPD

A1.7 Development Plan Documents are required to have a set of objectives which are used to inform policy development, and to aid assessment against the Sustainability Appraisal objectives. The Core Strategy provides the framework for the Policies DPD, so its objectives need to be drawn from or reflect the objectives and policies of the Core Strategy.

A1.8 Much of the Core Strategy Vision, and many of the spatial objectives, is relevant to the Housing Policies. In particular, the Vision aspires to:

- match growth and change with the highest standards of environmental protection and management;
- ensure that everyone has opportunities to achieve a high quality of life;
- enhance and conserve the City’s outstanding heritage and its most prized green spaces;
- improve the public realm, reduce the fear of crime and achieve a standard of architecture and design that upholds Oxford’s worldwide reputation;
- provide more affordable homes;
- establish mixed communities to provide a sense of place and build local identities;
- through good housing, improve our social, environmental and economic well-being, and, through good design, reduce our carbon footprint.

A1.9 Especially relevant Core Strategy Spatial Objectives are:

- plan for an appropriate mix of housing tenures, types and sizes to meet existing needs and future population growth;
- ensure that new developments are in accessible locations, to minimise overall travel demand;
- maximise regeneration and the reuse of previously developed land and make full and efficient use of all land, having regard to the distinctive character of each neighbourhood;
- maximise Oxford’s contribution to tackling the causes of climate change, and minimise the use of non-renewable resources;
- maintain, enhance and promote access to Oxford’s rich and diverse natural environment;
- help protect people and their property from flooding;
- preserve and enhance Oxford’s exceptional historic legacy of archaeology and monuments, buildings, designated landscapes, important views and setting, and the distinctive townscape characteristics.

A1.10 Some of these objectives have already been developed into policies in the Core Strategy (for example, developing in accessible locations (Policies CS1 and CS13), and enhancing biodiversity (Policy CS12). The main aim of the Housing DPD is to enable housing growth to help meet need, and promote balanced communities, quality of life and good design. Applying this aim, and the relevant Core Strategy objectives, to the scope of the Housing DPD, we have developed four objectives to guide its development:
<table>
<thead>
<tr>
<th><strong>Objective 1:</strong></th>
<th>Reduce carbon emissions from new residential development and move towards Zero Carbon standards in all developments.</th>
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<tbody>
<tr>
<td><strong>Objective 2:</strong></td>
<td>Increase the supply of affordable housing in Oxford, reflecting local demand for different types of tenure.</td>
</tr>
<tr>
<td><strong>Objective 3:</strong></td>
<td>Ensure all new residential development achieves high design quality, to provide good quality of life to its occupants, and enhances or preserves the amenity and character of neighbourhoods.</td>
</tr>
<tr>
<td><strong>Objective 4:</strong></td>
<td>Improve the balance of residential accommodation types across Oxford, including student accommodation, houses in multiple occupation and other forms of specialist housing.</td>
</tr>
</tbody>
</table>
Section A2 Core principles and standards

Design, character and context

Overview
A2.1 Well designed buildings and spaces are vital to an area’s character and distinctiveness. Good design is therefore the starting point for all residential development. The options below consider core design principles for residential development. Some options relate specifically to developing on residential garden land.

A2.2 At public consultation, some people stressed the need for development to enhance character, which includes designing at appropriate densities. There were mixed views on the appropriateness of developing residential garden land for housing.

Evidence
A2.3 At the time of writing, national Planning Policy Statements PPS1 (General Principles) and PPS3 (Housing) strongly promote high quality inclusive design over the lifetime of a development. This applies to the wider area as well as individual buildings. In particular, scale and density, and connections with the wider community, spaces and services are highlighted as crucial to successful residential development.

A2.4 Both PPS1 and PPS3 also promote mixed and diverse communities, to include a variety of housing types.

A2.5 There are a number of best practice resources in circulation that advise on how to achieve good design in its context. A useful tool, promoted by CABE (now part of the Design Council), is the Building for Life toolkit.¹ New housing developments are scored against a set of 20 criteria to assess the quality of their design. Higher scores of 14 or more can be awarded a ‘silver’ or ‘gold’ standard. The criteria cover four distinct categories:

- Environment and Community: requiring protection or enhancement of the environment, and provision of facilities for

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¹ www.buildingforlife.org

CORE STRATEGY SAYS...

Policy CS18
Planning permission will only be granted for development that demonstrates high-quality urban design through:

- responding appropriately to the site and its surroundings;
- creating a strong sense of place;
- being easy to understand and to move through;
- being adaptable, in terms of providing buildings and spaces that could have alternative uses in future;
- contributing to an attractive public realm;
- high quality architecture.

Planning permission will only be granted for development that:

- respects and draws inspiration from Oxford’s unique historic environment, both above and below ground;
- respects the unique townscape and character that exists in different areas of Oxford;
- preserves and enhances the character and appearance of the surrounding area, and does not have any adverse impact on historic buildings, their settings, or on views of the skyline of the historic centre.

SAVED LOCAL PLAN POLICIES | SAVE OR DELETE?
---|---
CP.1, CP.9, CP.11  | (Core Design Principles)  | Save all
HE.1 – HE.4, HE.6 – HE.10  | (Historic Environment and Archaeology)  | Save all
HS.22  | New public open space  | Delete
HS.23  | Children’s play space  | Delete

15
• **Character**: requiring a distinct character whilst exploiting local context;

• **Streets, Parking and Pedestrianisation**: requiring well-designed streets and parking provision, that do not dominate buildings, and are people and pedestrian friendly;

• **Design and Consultation**: requiring good design, architecture and adaptability, and uses of construction techniques that enhance performance and quality.

**A2.6** The Building for Life toolkit is generally more suitable for developments of 10 or more dwellings, as it covers things such as street design, connectivity and communal space. Some criteria are nevertheless valid for helping to assess the functionality, attractiveness and sustainability of smaller developments.

**A2.7** Locally, the Oxford Landscape Character Assessment provides a local context for design considerations. In addition, the Council is rolling out a series of Conservation Area Appraisals. The Council has also prepared a Character Assessment Toolkit, which provides a structure for those proposing development to understand the surrounding environment and context.

**A2.8** In 2007, Oxford City Council published the Balance of Dwellings SPD. The evidence base for the SPD showed that new development in Oxford was becoming dominated by small 1- or 2-bedroom dwellings, which can have a significant impact on the character of an area. Core Strategy Policy CS23 (Mix of Housing) promotes a balanced mix of all types of household, within localities and across Oxford as a whole.

**PREFERRED Option A**

**A2.9** The preferred option reflects the Core Policies of the Oxford Local Plan, in promoting a policy that sets out core principles, whilst allowing flexibility. It builds in particular on Core Strategy Policies CS1 (Hierarchy of centres), CS18 (Urban design, townscape character and the historic environment), CS19 (Community safety), CS23 (Mix of housing), and also HS.22 and HS.23 (which relate to provision of new open space in new development).

**A2.10** The preferred option policy would also require Building for Life ‘silver standard’ to be met as a minimum, for sites of 10 or more dwellings. Most developments should aspire to ‘gold standard’. This would provide a consistent measure of overall quality, which could be incorporated into the Design and Access Statement.

**PREFERRED Option A: Design, Character and Context**

Include a policy in the Housing DPD that builds on Core Strategy. In addition, require that residential development enhances the character of the area, including its heritage, built and natural features, and reflects the following:

• The mix of dwelling sizes, types and tenures are appropriately balanced, within the site and relative to Oxford as a whole, to reflect demographic and housing needs;

• The density, scale and spacing of buildings should make efficient use of land whilst reflecting the surrounding context, including any impacts on Oxford’s heritage assets;

• Landscaping and boundary treatments integrate with the development form, and provide a distinction between private and public space, whilst maintaining natural surveillance of the public realm and, where there is opportunity, include planting and wildlife habitat enhancement;
• proposals should demonstrate that there will be no significant increase in surface water runoff, potentially through the use of sustainable drainage measures;
• gates across street or estate entrances will be resisted;
• The development contributes to a walk-able and cycle-able neighbourhood, with streets designed or maintained to encourage human activity and natural surveillance, and slow traffic speeds. Pedestrians should be prioritised (including mobility impaired), whilst accommodating cyclists, buses, motor vehicle access and on-street car parking;
• where 20 or more dwellings are proposed, the developed site should generally provide a minimum of 10% of the total site area as public open space.

Require evidence that developments of 10 or more dwellings have been assessed against the Building for Life framework, and have demonstrably achieved, as a minimum, a score of 14 (‘Silver Standard’). However the Council would always expect developers to aspire to a score of 16 or more (‘Gold Standard’).

REJECTED Option B

A2.11 An alternative option was considered to not include a bespoke policy on design, character and context in the Sites and Housing DPD. Core Strategy Policy CS18 would instead form the basis for assessing design quality. Given the importance of good design, the Council considers it is important to include a policy in the Sites and Housing DPD to support implementation of the Core Strategy.

Rejected Option B: Design, Character and Context

Do not include a policy on design, character and context.

Residential garden land

Overview

A2.12 A contribution has been made to Oxford’s delivery of housing from residential garden land in recent years. However, private gardens are valued not only by their owners or occupiers, but often by neighbours who feel they add to the character of an area. They can provide wildlife habitats, a store for surface water following rainfall, and cumulatively help to regulate local and global climate.

A2.13 Planning Policy Statement 3: Housing (PPS3) sets out a definition for ‘previously developed land’ (often called ‘brownfield land’). Recent changes to PPS3 have excluded residential garden land from this definition. This means that gardens can now be treated differently to land that already has houses built upon it. It is therefore necessary for the Council to consider what approach to take to proposals that involve building on garden land.

A2.14 At public consultation, some felt that so-called ‘garden-grabbing’ and residential infill should generally be resisted. However others felt that this type of development may be appropriate, as long as there was a large enough plot of land available.
Evidence

A2.15 In Oxford, residential garden land development contributed just over 10% of all housing supply during the period 2003/04 to 2007/08. This kind of development can provide opportunities to build homes close to public transport routes, shops and other day-to-day services.

A2.16 Nevertheless, residential gardens can be an important contributor to the character of an area. As noted above, evidence on the character of neighbourhoods in Oxford is currently contained in the Oxford Landscape Character Assessment. The Oxford Character Assessment Toolkit and Conservation Area Appraisals provide additional information to support planning policy in providing information on the character of an area.

PREFERRED Option A

A2.17 Currently, the Council neither defines residential garden land as ‘greenfield’ nor as previously developed land. The preferred option therefore provides a local policy approach of residential garden land.

A2.18 The preferred option seeks to strike a balance between the contribution of gardens to local character, and the need to ensure that suitable land can be used for well-designed residential development. It also seeks to ensure that any negative impacts on biodiversity and surface drainage are properly mitigated.

**PREFERRED OPTION A: RESIDENTIAL GARDEN LAND**

Include a policy that defines residential garden land as separate from ‘greenfield’ (see definition below), and which requires proposals for development on garden land to comply with the following:

- proposals must respect the character of, and views from, streets, footpaths and other public areas;
- the size of plot to be developed is of an appropriate size to accommodate the proposal, taking account of the scale, layout and spacing of surrounding buildings, and the needs of those likely to occupy the development;
- proposals should not impact on the privacy, standard of daylight and general amenity of neighbouring properties;
- proposals should demonstrate that there will be no net loss of biodiversity value on the site, and where practicable measures to enhance biodiversity through habitat creation or improvement should be incorporated;
- proposals should demonstrate that there will be no significant increase in surface water runoff, potentially through the use of sustainable drainage measures.

For the purposes of the policy, **residential garden land** would be defined as follows:

Outdoor amenity land within the private or shared curtilage of a residential property or properties. Such properties include houses, flats, houses in multiple occupation (HMOs), guest houses, residential care homes and any building that was originally built as a house that has not been substantially altered.
Outdoor amenity land would include all landscaped areas - whether turfed or planted, or otherwise – including paths, sheds, private driveways and small ancillary outbuildings. In the case of purpose-built apartment blocks or residential institutions, outdoor amenity land would exclude large communal car parking areas and large communal storage or utility buildings.

Option B
A2.19 This option would provide a ‘light-touch’ framework. It would provide a presumption in favour of development on residential garden land, provided that other relevant policies in the Core Strategy and Housing DPD (e.g. dealing with character and neighbourliness) are complied with.

A2.20 This approach may do most to promote infill development in sustainable locations. On the other hand, it would not provide as many safeguards as the preferred option against negative impacts on character, amenity and biodiversity.

OPTION B: RESIDENTIAL GARDEN LAND

Include a policy that distinguishes residential garden land from ‘greenfield’ (see definition above), and which states planning permission will be granted for residential development on residential garden land, subject to other relevant local planning policies.

REJECTED Option C
A2.21 This alternative option reflects the concern some have expressed over residential garden development. It would put in place a presumption against development on garden land, unless it is infill development (i.e., between existing flank walls or extensions to existing dwellings).

A2.22 This option has been rejected, as there is a significant risk that it could reduce the number of homes built in sustainable locations.

REJECTED OPTION C: RESIDENTIAL GARDEN LAND

Include a policy to state that planning permission will be granted for infill residential development (see definition below), subject to other local planning policies.

For the purposes of this policy, *infill development* would be defined as buildings which are constructed in the space between the side (flank) walls of existing buildings, or which are extensions built onto existing dwellings. The definition would exclude any part of a private residential garden not within the above definition. Such land would be regarded as greenfield.

Policy would refer to Core Strategy Policy CS2, which states that planning permission will not normally be granted for any development on greenfield land (defined to include residential garden land), unless it is specifically allocated for development, or it is required to maintain a five-year rolling housing land supply.
REJECTED Option D

A2.23 An option to judge each case on its merits, in light of national guidance and other LDF policies, was considered. This approach has been rejected, as the changes to PPS3 have resulted in a lack of any specific policy guidance for such proposals.

**REJECTED OPTION D: RESIDENTIAL GARDEN LAND**

Do not include a policy in the Housing DPD regarding managing development on residential garden land. Assess on a case-by-case basis using national, other DPD and saved policies, and other relevant evidence.
Accessible and adaptable dwellings

Overview of issue
A2.24 The City Council wishes to see new homes built that are accessible to all who may wish to live in them, and visit them, including those with disabilities. It should also be borne in mind that most people will become less mobile generally as they become older, therefore homes should be able to adapt to these changing needs.

A2.25 At public consultation, there were some participants who felt that a higher priority should be given to accessibility issues for disabled people.

Evidence
A2.26 Current building regulations require new developments to have a minimum standard of accessibility to and into the entrance level of a building. However some consider that these minimum statutory standards provide only limited usability within the home for a disabled person.

A2.27 The current Local Plan Policy HS.12 (Adaptable Dwellings) refers to the Lifetime Homes Standard\(^2\) for new residential development. This is a widely used national standard, which uses technical advice to ensure that the spaces and features in new homes can readily meet the needs of most people, including those with reduced mobility. The Lifetime Homes standard is a website resource, which is updated regularly.

A2.28 The Lifetime Homes website notes that whilst lifetime homes can accommodate or adapt to the needs of many wheelchair users, the standard does not match the enhanced accessibility provided by a property constructed to the Wheelchair Housing Design Standard. Only developments designed to wheelchair housing standards can ensure that not only does a wheelchair user have access to every facility inside and outside of the dwelling, but also has choice on how best to approach (and sometimes adjust) that facility to suit their particular needs.

A2.29 In developing the options below, we have had regard to the policies of the London Plan, which sets strategic planning policies for all London boroughs. The London Plan requires all new homes to meet the Lifetime Homes standard. It also expects 10% of all new homes to be built to be easily adaptable to fully wheelchair accessible.

A2.30 The Council have looked at a regional estimate of households requiring wheelchair accessible dwellings, and applied this to Oxford. Allowance has been made for an assumed backlog of households in need of wheelchair accessible housing. This has led us to conclude that 5% of all new dwellings should be designed as either wheelchair accessible, or easily adaptable to wheelchair accessible, to meet current and future need in Oxford.

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\(^2\) [www.lifetimehomes.org.uk](http://www.lifetimehomes.org.uk)
PREFERRED Option A
A2.31 The preferred option would ensure that the majority of new dwellings would be designed to lifetime homes standard, thus providing genuine choice for people with mobility issues. It would also ensure that most new dwellings would be adaptable to residents’ changing needs. This would help meet the ambitions of the Council to meet housing need, and to reduce the extent of inequality and improve the lives of the most vulnerable members of our society.

**PREFERRED OPTION A: ACCESSIBLE AND ADAPTABLE DWELLINGS**

Include a policy in the Housing DPD which requires that:
- all new dwellings meet the Lifetime Homes standard, and
- on sites of 4 or more units (gross), at least 5% of all new open market dwellings (or at least 1 dwelling for sites below 20 units) are either wheelchair accessible, or easily adapted for wheelchair use.

Policy to state that where there are over-riding practical or heritage reasons that prevent full compliance with the above, flexibility may be applied as appropriate to the circumstances. For all developments to which the policy applies, the Council would expect evidence to be set out in the Design and Access Statement to demonstrate that the policy has been met.

Option B
A2.32 An alternative option is to require only that all new dwellings are expected to meet the Lifetime Homes standard, with no specific requirement for wheelchair accessible homes. This option may be more likely to help with housing delivery, but would not improve housing choice for wheelchair users.

**OPTION B: ACCESSIBLE AND ADAPTABLE DWELLINGS**

Include a policy in the Housing DPD which requires that all new dwellings meet the Lifetime Homes standard. Do not specify a requirement for wheelchair accessible homes.

Option C
A2.33 A further alternative is to roll forward Local Plan Policy HS.12 (Adaptable Dwellings). This requires far fewer adaptable dwellings on a given site, and would not greatly improve housing choice for people with mobility issues. It provides decision makers with considerable flexibility in determining what constitutes a ‘suitable site’ for adaptable dwellings.

**OPTION C: ACCESSIBLE AND ADAPTABLE DWELLINGS**

Policy to state that the City Council will seek, on suitable sites, at least 15% of new market houses to be easily adapted to meet the needs of people with disabilities.

REJECTED Option D
A2.34 This option would recognise that building regulations ensure that some degree of accessibility for disabled people is mandatory for all new homes. However, the regulations relate mainly to accessibility for visitors, and therefore do little to ensure that homes are suitable for occupation by people with disabilities. The option has been rejected, as it is not considered to promote social inclusion and a mix of housing types.

**REJECTED OPTION D: ACCESSIBLE AND ADAPTABLE DWELLINGS**

Do not include a policy that requires adaptable lifetime homes or wheelchair accessible homes on new housing sites.
Overview of issue

A2.35 The Core Strategy seeks to ensure that all new residential developments are built in a sustainable way. This is in line with the strategic objective which states: Maximise Oxford’s contribution to tackling the causes of climate change, and minimise the use of non-renewable resources.

A2.36 The Core Strategy acknowledges the national move towards Zero Carbon Developments and also requires that the Natural Resource Impact Analysis (NRIA) checklist is the means to assess this when considering development proposals.

A2.37 Comments from the consultation regarding environmental sustainability in new housing developments were mainly positive. The majority of people were in support of encouraging low carbon and energy efficient housing.

A2.38 It is worth noting that the options in this section deal specifically with residential development. Therefore the NRIA SPD would still be applied to non-residential developments in accordance with Core Strategy Policy CS9 and the NRIA SPD.

Evidence

A2.39 The NRIA SPD was designed to focus on the construction elements of a development (e.g. energy efficiency, water efficiency, renewable energy and use of recycled materials) that make the development itself sustainable. It includes a requirement that any development site of 10 or more homes should generate at least 20% of its energy requirements using renewable energy technologies.

A2.40 Since its introduction in 2006, there has been a general acceptance from the development industry that sustainability considerations need to be factored into the planning of developments. It has been a successful tool in promoting and measuring the sustainability of new developments across Oxford, including the use of small-scale renewable energy generation.

A2.41 Statutory building regulations are not part of the planning system, but have an increasingly important impact on the sustainability of new buildings. ‘Part L’ of these regulations sets minimum standards for energy efficiency in new buildings, including homes. Proposed changes to the Building Regulations to improve energy efficiency in new buildings (Part L) are due in 2013 and 2016. These proposed changes are likely to mirror the higher tier standards set out in the Code for Sustainable Homes.

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**Core Strategy Says...**

**Policy CS9 Energy and Natural Resources**

All developments should seek to minimise their carbon emissions. Proposals for development are expected to demonstrate how sustainable design and construction methods will be incorporated. All development must optimise energy efficiency by minimising the use of energy through design, layout, orientation, landscaping and materials, and by utilising technologies that help achieve Zero Carbon Developments.

In particular, planning permission will only be granted for developments on qualifying sites that demonstrate, through submitting an Natural Resource Impact Analysis checklist, how they will:

- minimise the use of energy by using energy-efficiency solutions and technologies;
- deliver a proportion of renewable or low-carbon energy on site;
- incorporate recycled or reclaimed materials; and
- minimise water consumption by incorporating appropriate design and technologies,

in accordance with the Natural Resource Impact Analysis Supplementary Planning Document.

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**Saved Local Plan Policies**

<table>
<thead>
<tr>
<th>Policy Code</th>
<th>Description</th>
<th>Save or Delete?</th>
</tr>
</thead>
<tbody>
<tr>
<td>CP.17</td>
<td>Recycled materials</td>
<td>Save</td>
</tr>
<tr>
<td>CP.18</td>
<td>Natural Resources Impact Analysis</td>
<td>Save</td>
</tr>
</tbody>
</table>
A2.42 The Code for Sustainable Homes (CfSH) is the Government’s chosen methodology for assessing the sustainability of new housing developments. In order to reach a particular level of the CfSH, there are both mandatory and optional categories. If minimum scores are not met in the mandatory categories, a nil rating is gained. One of the mandatory criteria is energy efficiency. The basic standard for meeting this criterion is now incorporated into Part L of the Building Regulations.

Viability

A2.43 The Affordable Housing Viability Study (King Sturge, 2011), examined the likely impact of applying CfSH level 4 from 2013, plus a requirement for 20% of energy requirements to be generated by on-site renewable technologies, on a sample of housing sites across Oxford. This would be additional to other planning obligation (section 106) costs, including provision of 50% of homes as affordable housing. The testing showed that these requirements would not normally make developments of 10 or more dwellings unviable. However this was not the case for the majority of sites of less than 10 dwellings.

Student accommodation

A2.44 The Local Plan set a threshold of 10 houses or flats to trigger a requirement for submitting a completed NRIA checklist. However no specific threshold was set for student accommodation, other than a floorspace threshold of 2,000m², which is more appropriate for non-residential uses. This DPD proposes to set an explicit threshold for qualifying student developments.

A2.45 It is considered that a threshold for student accommodation should be adopted that is broadly equivalent to 10 dwellings, in terms of building footprint. Appropriate thresholds, expressed as floorspace and number of student bedrooms, are set out in the options below.

Preferred Option A: Energy efficiency and natural resources

A2.46 This option would require that development proposals for housing and student developments must produce 20% of their energy from on-site renewable or low carbon technologies.

A2.47 Changes to Part L of the building regulations in 2013 and 2016 will progressively improve energy efficiency in all new developments. The Council considers that after 2013, these improved standards would supersede the energy efficiency standards set out in the NRIA checklist. Furthermore, as the standards would, by law, have to be met prior to occupation of the building, there would be no need for monitoring or enforcement once developments were completed. Building regulation standards do not need to be duplicated in planning policy.

A2.48 It is considered however that compliance with the full NRIA checklist, including the 20% on-site renewable or low-carbon energy requirement, should continue to apply to residential (and student developments) until 2013. This reflects Core Strategy Policy CS9 (Energy and Natural Resources).

A2.49 The changes to the building regulations expected in 2013 and 2016 are likely to mirror the energy efficiency requirements for level 4 and ‘zero carbon’ standards respectively under the Code for Sustainable Homes. However the improved standards would not require actual on-site renewable or low-carbon energy production. Therefore a local policy requirement for 20% of a site’s energy requirements to be generated sustainably, within the site, would be maintained.

A2.50 Oxford has had a long history of success with the NRIA, especially the 20% on-site renewable element. This requirement has applied to residential developments of 10 or more homes. The Council considers a threshold of 10 homes, or the equivalent 20 student rooms, to be a reasonable threshold that maintains viability on all development sites.
**Preferred Option A: Energy Efficiency and Natural Resources**

Require that qualifying development proposals produce 20% of their energy from on-site renewable or low carbon technologies.

For the purposes of this policy, qualifying developments would be:

- 10 or more dwellings, or
- 20 or more student rooms, or
- 500m$^2$ or more of student accommodation even where there are less than 20 rooms.

The NRIA would no longer apply to residential developments or student accommodation from 1st April 2013. From this date, Part L of the Building Regulations will require improved energy efficiency standards in all new homes.

**Option B**

**A2.51** This option builds on the Core Strategy approach, but would incorporate the full Code for Sustainable Homes into planning policy from 2013. As with the preferred option, the NRIA would provide the methodology for assessing the sustainability credentials of new housing developments in Oxford until April 2013. After this, it is considered that some of the standards that are required in new homes to meet level 4 of the Code for Sustainable Homes are directly comparable to specific requirements of the NRIA checklist. An additional requirement would be to provide 20% on-site renewable or low-carbon energy on sites of 10 or more dwellings.

**A2.52** The Code for Sustainable Homes (CfSH) goes further than the improved building regulation standards due to come into force in 2013. It is intended to promote even higher standards of sustainable design. For example, it includes more stringent standards on water efficiency. However the standards in CfSH are not statutory, hence it may be difficult to enforce and monitor their implementation, and their effectiveness over time.

**A2.53** The different levels of energy efficiency criteria set out in the CfSH mirror the proposed advances and changes up to 2016 in Part L of the Building Regulations. However the CfSH covers a much wider set of sustainability criteria than minimum building regulations. For consistency, the Code for Sustainable Homes criteria would apply to schemes of 10 dwellings or more.

**Option B: Energy Efficiency and Natural Resources**

Require that (from 2013) development proposals for 10 dwellings or more meet the following levels of the Code for Sustainable Homes and renewable energy requirements as set out below. The NRIA will continue to be applied to development proposals in its current form (with respect of residential developments until 2013). After 2013, the 20% on-site renewable or low-carbon energy element would continue to apply to 10 dwellings or more:

<table>
<thead>
<tr>
<th>Year</th>
<th>2010 Assessment Methodology</th>
<th>April 2013</th>
<th>April 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>NRIA</td>
<td>Code level 4 +20% on-site renewables/low-carbon</td>
<td>Zero Carbon + 20 on-site renewables/low-carbon</td>
<td></td>
</tr>
</tbody>
</table>
Require that development proposals for student accommodation (from 2013) meet the following levels of BREEAM Multi-Residential and renewable energy requirements set out below. For student accommodation, the NRIA would apply to development proposals of 20 units or more (or 500 m² or more of student accommodation)

<table>
<thead>
<tr>
<th>Year</th>
<th>Assessment Methodology</th>
<th>2013</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>NRIA</td>
<td></td>
</tr>
<tr>
<td></td>
<td>BREEAM Multi-Residential Excellent +20% on-site renewables</td>
<td>BREEAM Multi-Residential Outstanding +20% on-site renewables</td>
<td></td>
</tr>
</tbody>
</table>

After 2013, the NRIA would no longer apply to residential developments (including student accommodation).

**Option C: Energy efficiency and natural resources**

**A2.54** The Core Strategy supports the continued use of the NRIA which has been very effective in raising awareness and promoting low carbon and renewable technologies in development proposals. However, the NRIA SPD is becoming less relevant as its requirements are superseded by changes to Part L of the building regulations and the Code for Sustainable Homes.

**A2.55** The NRIA SPD would be updated under this option, and would continue to be used after 2013. Nevertheless, a drawback to this approach would be inconsistencies between NRIA requirements and the CfSH, particularly in the method of assessment used.

**OPTION C: ENERGY EFFICIENCY AND NATURAL RESOURCES**

Maintain the current policy approach. Use the NRIA SPD as the main sustainability checklist for new developments within the City. Update the threshold at which the NRIA is applied in the Housing DPD. Thus defining “qualifying developments” from Core Strategy Policy CS9 as 10 or more residential dwellings or 20 or more student study rooms.

**REJECTED Option D: Energy efficiency and natural resources**

**A2.56** The above options relate to new build (both housing and student accommodation). However there is also the issue of the existing housing stock. The Energy Savings Trust recommended that the City Council should consider reviewing planning policy to assist reducing the environmental impact of the existing housing stock. This would involve imposing a condition on planning permissions for extensions to people’s homes to require energy efficiency improvements to be made to the rest of the property (this is sometimes referred to as ‘consequential improvements’).

**A2.57** The Council’s view is that it would be legally invalid to impose a condition requiring consequential improvements where an application was submitted for an extension to a property. This is because the condition in question would not pass one of the legal tests of planning conditions imposed by the Courts. The legal test in question is that “Conditions must fairly and reasonably relate to the development permitted”\(^3\). In this instance

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3 The following cases introduced and gave clarification on the use of planning conditions:  
Pyx Granite Co Ltd. v Ministry of Housing and Local Government [1958] 1 QB 554  
Fawcett Properties Ltd. v Buckingham CC [1961] AC 636; and  
Newbury DC v Secretary of State for the Environment [1981] AC 578

26
the “development permitted” would be the extension and not the remainder of the property. As such it would also be impossible to enforce such a condition. Thus such a condition would also fail the policy test of enforceability as set out in Circular 11/95.

A2.58 The option of including a policy which requires existing properties to make consequential improvements has therefore been rejected. Improvements to the existing building stock would be better addressed by changes to the Building Regulations to require consequential improvements.

**REJECTED OPTION D: ENERGY EFFICIENCY AND NATURAL RESOURCES**

Include a policy promoting ‘consequential improvements’ to existing homes.
Car and cycle parking

(A) Car Parking

Overview of issue

A2.59 Provision of residential parking should always be carefully considered when planning for new homes. The amount of space given to vehicle parking can take up significant amounts of land. Furthermore, most of Oxford has very good accessibility to local services by walking, cycling and bus travel.

A2.60 However, too little car parking space in residential areas can cause pressure for on-street parking. It is important to balance reasonable provision that meets people’s everyday needs with the efficient use of land, good design and with encouraging use of sustainable transport modes.

A2.61 At public consultation, some commented that there is a need to ensure adequate levels of parking in new development. Others felt that private residential parking should be restricted to reduce traffic generation.

Evidence

A2.62 Overall, car ownership in Oxford is significantly below towns elsewhere in Oxfordshire, and in the South East region generally. In 2001, 33% of households in Oxford did not own a car.

A2.63 National evidence suggests a clear link between cars owned per household and the number of trips made per household by car.\(^4\) Given Oxford’s accessible nature, and the need to make efficient use of land, it is therefore not appropriate to make provision for more car parking than is absolutely necessary. However the Council also recognises that parking congestion regularly occurs in areas where the demand for parking by residents outstrips supply.

A2.64 In 2006, the Oxfordshire Design Partnership commissioned Phil Jones Associates with WSP to research residential parking demand across Oxfordshire and suggest revised parking standards to reflect this evidence.\(^5\) The study found from Census data that dwelling size (number of rooms) and tenure are the most important factors influencing car ownership for a particular property. In Oxford, it was found that car ownership varies significantly between different areas of the city.

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\(^5\) Residential Parking Research and Draft Guidance (Phil Jones Associates in association with WSP, May 2008)
Houses in multiple occupation

A2.65 The Council is aware that particular parking pressures can occur where there are large concentrations of houses in multiple occupation (HMOs). The Council will from February 2012 have planning controls over the creation of new HMOs (3 or more unrelated occupants), and will have regard to the impact on on-street parking in determining applications for HMOs. When considering HMO applications, the Council will need to carefully assess whether additional parking is necessary to make any given HMO proposal acceptable, having regard to the adopted standard for HMOs, the size and nature of the dwelling as existing, and existing parking pressures.

Purpose-built student accommodation

A2.66 The Core Strategy Policy CS25 states that for new student accommodation, an undertaking will be secured that students do not bring cars into Oxford. In line with the Core Strategy, parking provision for new student halls will only be permitted for disabled students (blue badge holders).

A2.67 In controlled parking zones, the car-free status of student accommodation can be readily enforced by excluding the new building from any entitlement to resident permits. For developments outside of CPZs, the Council works closely with the developer and relevant institution, to ensure that, through penalties attached to occupants’ lease agreements, there is a strong deterrent against students bringing cars into Oxford.

Retirement homes, nursing homes and extra care housing

A2.68 The Council’s experience of specialist forms of residential development, such as extra care housing, retirement homes, and nursing homes, is that the current Local Plan standards make appropriate provision for occupants’ and visitors’ parking needs.

PREFERRED Option A

A2.69 The Phil Jones Associates / WSP Residential Parking Study sets out guideline parking standards that would be applicable to suburban areas of Oxford. The report recommended that it is feasible to design for car ownership below demand levels in more urban areas of the city.

A2.70 A key recommendation of the parking study report was to set out local parking standards that take greater account of the impact of allocating parking spaces to particular properties. In general, it is more efficient for residential parking to be provided as unallocated (i.e. on the street), as it can be used more flexibly throughout the day. Therefore, less parking will be required overall where some of the provision is shared between all residents and their visitors.

A2.71 Taking account of the study findings, the Preferred Option sets out maximum parking standards for 1, 2, 3 and 4+ bedroom dwellings. As these are maxima based on market housing, and include a ‘growth factor’ to allow for an increase in car ownership, they should accommodate all reasonable parking demands, whether in an urban or suburban neighbourhood. The option also allows for lower provision to be made in appropriate circumstances, such as for infill development in high-density urban locations, or where low-car or car-free development is deemed appropriate.

A2.72 The West End Area Action Plan sets more restrictive residential parking standards that are specific to the City centre’s West End. The Transport Central Area (TCA), defined on the Oxford Proposals map, is the wider City centre where robust parking restraint measures are promoted. It is proposed that the West End standards are in future applied across the whole of the TCA.

A2.73 Separate standards are put forward for HMOs, student accommodation and specialist care housing. The standard for HMOs reflects the findings of the parking study, which showed that rented properties tend to have lower car ownership than owner-occupied ones. The current local plan standard of 1 space per 2 habitable...
rooms is therefore suggested as an appropriate maximum standard. Similarly, for other forms of specialist housing, the current local plan standard is suggested as appropriate.

**Preferred Option A: Residential Car Parking**

Outside the Transport Central Area (TCA), adopt maximum parking standards for houses and flats as set out in the PJA/WSP Residential Parking Standards report. Within the Transport Central Area, adopt maximum parking standards equivalent to those set out in the West End Area Action Plan:

- **Houses**: 1 space per dwelling
- **Flats**: Disabled parking only

For other types of housing, readopt the maximum parking standards set out in the Oxford Local Plan.

The proposed standards for houses and flats outside the TCA are shown below. These include any spaces allocated to a property, and additional provision to be shared between all residents and visitors (whether or not in a CPZ):

<table>
<thead>
<tr>
<th>Bedrooms</th>
<th>No parking allocated</th>
<th>1 space allocated</th>
<th>2 spaces allocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (inc. studios)</td>
<td>1.0</td>
<td>1.4</td>
<td>not permitted</td>
</tr>
<tr>
<td>2</td>
<td>1.5</td>
<td>1.7</td>
<td>2.3</td>
</tr>
<tr>
<td>3</td>
<td>1.8</td>
<td>1.9</td>
<td>2.4</td>
</tr>
<tr>
<td>4+</td>
<td>2.1</td>
<td>2.2</td>
<td>2.5</td>
</tr>
</tbody>
</table>

**HMO (C4 / Sui Generis)**: 1 space per 2 habitable rooms where deemed necessary

**Student accommodation**: Disabled parking only (to be decided on merits using a guideline 5% of study bedrooms to provide for disabled parking)

- **Retirement homes**: 1 space per 2 units (plus, 1 space per 2 staff)
- **Sheltered / extra care homes**: 1 space per 2 units (plus, 1 space per 2 staff)
- **Nursing homes**: 1 space per 3 units (plus, 1 space per 2 staff)

Where applicable, the Council would additionally permit up to 1 additional space per staff member who permanently lives on the site. No staff parking would be permitted within the Transport Central Area, except for limited disabled provision.

The proposed maximum standards within the TCA are as follows:

- **1 space per house**
  - Disabled parking only for flats and HMOs (to be decided on its merits using a guideline 5% of units to provide for disabled parking).

For all proposals, the context and character of the area would be material in determining appropriate parking provision. Parking below the maximum standard may be appropriate for infill development in high density areas, or where a controlled parking zone is in operation. Car-free housing and car clubs would be encouraged in suitable locations.

Policy would require parking provision to be designed to be well-integrated with the development. All proposals that involve creating a new vehicular access would be expected to provide some shared, ‘off-plot’ spaces, available to all residents and visitors, in line with the above standards.

The Parking Standards SPD would continue to provide further guidance on these matters.
Option B

**A2.74** The Oxford Local Plan Appendix 3 includes residential parking standards that distinguish the Transport Central Area as suitable for lower residential parking provision, including some car-free housing.

**A2.75** Option B rolls forward the existing Local Plan approach. It therefore represents ‘business as usual’. However this approach does not fully reflect the updated evidence explained above, or the greater focus on shared on-street parking for new developments.

**OPTION B: RESIDENTIAL CAR PARKING**

Outside the Transport Central Area (TCA), adopt the following maximum car parking standards for houses and flats:

**Small-scale development:** Provision to reflect the traditional layout of the properties surrounding it, up to a maximum provision of:

- 1 bedroom dwelling: 1 space
- 2/3 bedroom dwelling: 2 spaces
- 4+ bedroom dwelling: 3 spaces

**Larger development (where a new access road is created):** A maximum of two on-plot spaces per dwelling, with the overall provision across the development not to exceed the following maximum standards:

- Dwellings of up to 2 bedrooms: 1.5 spaces
- Dwellings of 3 bedrooms or more: 2.5 spaces

Some of this provision should be off-plot so that it is able to be shared and made available for visitors.

Within the TCA, a maximum of one off-street space per dwelling would be permitted as there are excellent alternatives to the car. (Note there are separate adopted standards for the West End area which are set out in the West End Area Action Plan.)

**REJECTED Option C**

**A2.76** The Residential Parking Standards report recommends that it is feasible to design for car ownership below demand levels in more urban areas of the city. However this does not necessarily apply to the less densely developed ‘outer Oxford’ wards, where car ownership is on average higher.

**A2.77** This option therefore proposes applying *minimum* car parking standards across much of the City. It has been rejected as it is considered to conflict directly with the Core Strategy objectives to use land efficiently, and to promote a reduction in car use, minimise the impact of traffic, and encourage walking, cycling and public transport.

**REJECTED OPTION C: RESIDENTIAL CAR PARKING**

Define an ‘Inner Oxford parking zone’ on the Oxford Proposals Map to include the following wards: Holywell, Carfax, North, Jericho & Osney, Hinksey Park, Iffley Fields, St Mary’s and St Clements. Define remaining wards as ‘Outer Oxford parking zone’ on the Proposals Map.
Within the Inner Zone, apply maximum parking standards for houses and flats using the figures set out in the Preferred Option (outside transport central area) for all residential types of development.

Within the Outer Zone, apply these same standards as minimum parking standards, again using the figures set out in the Preferred Option (outside transport central area) for all residential types of development.

(B) Cycle Parking

Overview of issue
A2.78 One of the objectives of the Oxford Core Strategy is to “promote a reduction in car use, minimise the impact of traffic, and encourage walking, cycling and the use of public transport.” As a compact, urban city, Oxford already supports a thriving cycling culture, and provides opportunity to further promote cycling as people’s first choice for travel. A fundamental building block of enabling cycling is the provision of secure cycle storage within people’s homes.
A2.79 At public consultation, many people responded positively to the idea of prioritising cycle parking in new developments over car parking.

Evidence
A2.80 The Residential Parking Study\(^6\) surveyed a sample of Oxford households to assess average cycle ownership. It found that cycle ownership was greater in Oxford than in other parts of Oxfordshire. The average number of bikes owned by households living in houses was 2.65, and the average for households living in flats was 0.97.

Student accommodation
A2.81 Oxford Brookes University’s Green Travel Plan sets a target for 2015 of 12% of all its students to cycle to their place of study. However this covers all their campuses, including Wheatley and Harcourt Hill, and allows for a significant number of part-time students who do not live locally and therefore do not have the option of cycling. The highest target for trips by cycle relates to the School of Health and Social Care (Marston Road), which has a target of 25% of trips by cycle in 2015.
A2.82 A survey of University of Oxford students in 2009 found that 59% of all students who responded to the survey own a bicycle in Oxford. 41% of respondents said that they usually cycle to their normal place of study (compared with 52% who walked).\(^7\)
A2.83 The Core Strategy states that occupants of all new student accommodation will be prohibited from bringing a car into Oxford, through applying an appropriate condition. This will include halls of residence occupied by students of private colleges and language schools. It is therefore important that the majority of students living in new purpose-built accommodation have the opportunity of owning a bike, for study, leisure and work purposes.

Houses in multiple occupation
A2.84 HMOs are often occupied by those studying in Oxford, many of whom rely on cycling as a cheap and convenient way of moving between home and potentially many study bases. Many people who work in Oxford

\(^6\) Residential Parking Research and Draft Guidance (Phil Jones Associates in association with WSP, May 2008)
\(^7\) Information provided by University of Oxford Estates Directorate
are also known to live in HMOs, particularly those on modest incomes, for whom cycling will also be popular. A higher requirement for HMOs compared with single household dwellings is therefore considered appropriate.

Retirement homes, nursing homes and extra care housing

A2.85 People who live in retirement homes or in extra care housing are less likely to own or regularly use cycles. Those who live in nursing homes are even less likely to cycle. Therefore, it is reasonable for these types of development to make provision on merit, to include some staff provision.

PREFERRED Option A

A2.86 It is clear from the Residential Parking Research survey that the average number of cycles per household is significantly different for houses and flats. It also indicates that the current local plan standard of 2 spaces per dwelling may not provide sufficiently for all houses.

A2.87 The Preferred Option reflects this up-to-date evidence. It also reflects the need to aspire to greater levels of cycle ownership, which in turn may result in an overall increase in cycling as a mainstream travel choice.

A2.88 The standard of provision for student accommodation gives flexibility, taking into account that more students may choose to cycle when living further away from their places of study (whereas those within close proximity are more likely to walk). The standard for HMOs, residential conversions and some infill developments on constrained plots may also need to be applied flexibly, to take account of context, location and access.

PREFERRED OPTION A: RESIDENTIAL CYCLE PARKING

Adopt the following minimum standards for cycle parking for houses and flats:

- Houses and flats of 3 or more bedrooms: 3 spaces per unit
- Houses and flats up to 2 bedrooms: 2 spaces per unit

Adopt the following minimum standards for student accommodation:

- A minimum 3 spaces for every 4 study bedrooms

Policy would state that a reduced standard of 1 space for every 2 study bedrooms may be accepted where proposals are located close to the institution where most of its occupants will be studying.

Adopt the following minimum standard for HMOs:

- A minimum of 1 space per occupant

Policy would state that flexibility may, as an exception, be applied to the standard for HMOs, residential conversions or some infill developments where over-riding site-specific constraints prohibit such provision, and the proposal is acceptable in other respects.

Policy would clarify that main provision for all residential cycle storage must be secure, undercover, preferably enclosed, and provide level, unobstructed external access to the street.

Option B

A2.89 Option B rolls forward the existing requirement as set out in the Oxford Local Plan (Appendix 4), in respect of dwellings and student accommodation. No specific requirement is set out in the Local Plan for HMOs, or any other type of residential development.
### OPTION B: RESIDENTIAL CYCLE PARKING

Adopt the following minimum standards for residential cycle parking:

- **Residential dwellings:** 2 spaces per residential unit
- **Student accommodation:** 1 space per 2 resident students, plus 1 space per resident staff

Policy would state that the requirement for residential dwellings would be applied flexibly for HMOs, flats or sheltered accommodation, and, if for a change of use or extension, the feasibility of providing secure cycle parking within the dwelling curtilage would be assessed.
Overview of issue

A2.90 In Oxford there is a huge need for affordable housing. The provision of new affordable housing has an important role in delivering mixed and balanced communities, both within a site, and across Oxford as a whole. There is a growing housing crisis in Oxford. Working to increase the provision of affordable, high quality housing is a key priority for the Council.

A2.91 Core Strategy Policy CS25 supports the Council’s objectives of providing an appropriate balance of housing, including a mixture of housing tenures, types and sizes to meet existing need and future population growth. The Core Strategy defines affordable housing as “dwellings at a rent or price that can be afforded by people who are in housing need and would otherwise be accommodated by the City Council.”

A2.92 Public consultation has indicated strong support for requiring a significant proportion of development to be built as affordable housing. Some stressed the importance of fully integrating affordable housing within neighbourhoods.

Evidence

A2.93 Oxford has a huge need for affordable housing. This has been documented by numerous studies. Oxford has been described as a city with London house prices and Midland’s wages. Clearly this creates an affordability gap for many.

A2.94 The Oxfordshire Housing Market Assessment (2007) estimated that the annual shortfall of affordable housing in Oxford from 2011-2016 would be between 1,981 and 4,884 homes per year, taking account of the existing backlog and new households in need of affordable housing. Clearly if every new home built in Oxford was affordable, we would still not meet the need. The annual need will in the future increase as the backlog increases.

A2.95 On average, the cost of buying a home in Oxford far exceeds average incomes, and the cost of renting in the private sector is high. A recent Centre for Cities report8 confirms the increasing gap between average Oxford household income and the average cost of a home in the City. Figure 1 below highlights the uniquely poor affordability of housing in Oxford: of all the cities and towns looked at, Oxford has the second highest

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house prices (behind London) but wages are similar to those paid in Swindon and Milton Keynes, where house prices are much lower.

![Figure 1: City wages & cost of living Source: Cities Outlook 2011 (Centre for Cities, 2011)](image)

**Planning policy**

A2.96 The Oxford Local Plan expects 50% of a development to be provided as affordable housing from any site of at least 10 dwellings, from any site with capacity to provide 10 dwellings, or on a site of 0.25 hectares or more in area. This is supported by the Affordable Housing SPD (2006) which provides further clarification that the affordable homes should be provided as 80% social rent / 20% shared ownership.

A2.97 Oxford’s Annual Monitoring Report 2010 indicates that the 50% policy requirement was met on nearly all qualifying sites between April 2006 and March 2009, where full planning permission was granted. Over a four year period up until March 2010, 763 new affordable homes were built. It is clear that since the adoption of the Local Plan, its policies have been very successful in delivering affordable housing.

A2.98 In 2008, the Oxford Strategic Partnership set up an ‘Affordable Housing Select Committee’ to investigate how to deliver more affordable housing. The select committee identified a perverse incentive to under-develop sites which had a capacity of 10 or just over, so that the affordable housing requirement could be avoided. The impact of the 10 threshold has become known as the ‘cliff edge’ due to the sudden ‘jump’ in the cost of developing such sites compared with sites of 9 units or less.

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10 Report of the Oxford Strategic Partnership Select Committee on Affordable Housing (Oxford Strategic Partnership, 2008)
Viability

A2.99 The City Council appointed property consultants King Sturge to assess the viability of providing affordable housing in the current housing market. The viability study concluded that the majority of sites of 10 or more dwellings are viable, where 50% of dwellings are provided as affordable homes, on a no-grant basis, and where 80% of affordable units are provided as social rented units. Full section 106 costs were applied.

A2.100 The viability study identified that sites of less than 10 dwellings were generally not viable with 50% affordable housing provided on-site with full section 106 requirements. These smaller sites can however afford to make a financial contribution towards creating affordable housing elsewhere in Oxford.

Affordable rent

A2.101 The Government has recently introduced a new form of affordable housing, which is called Affordable Rent. Within this model the housing provider can charge up to 80% of the cost that someone would pay in the open market. While the City Council accepts that in parts of the Country this model may work, in Oxford where house prices are high, and market rents are especially high, this model would mean that Affordable Rent would not be affordable to those in greatest housing need. The traditional method of assessing affordability is to assume that no more than 30% of a household’s income should be spent on their housing costs. In Oxford, it is highly likely that Affordable Rent would be significantly higher than 30% of the household income of those who we are trying to house.

PREFERRED Option A

A2.102 Local Plan Policy HS.4 has been successful in delivering a significant amount of new affordable housing from new development consisting of 10 or more dwellings, and creating mixed and balanced communities. Given the viability evidence, it is not considered that there is any need to amend this part of the policy.

A2.103 However, much future housing is expected to come from sites of less than 10 dwellings in future years. It is therefore important that these small sites make a contribution to mixed and balanced communities in Oxford.

A2.104 The Council has looked at the viability of these smaller sites of less than 10 units on the basis of making a financial contribution towards the provision of affordable housing elsewhere in Oxford. This would help to achieve the objective of maintaining a mixed and balanced community across Oxford as a whole. The Council found that this requirement maintains sites as viable.

A2.105 Sites of less than 4 units (gross) would be exempted from this policy, in recognition of the practical difficulties in applying the policy to very small developments. However, thresholds used in the final policy may be reviewed subject to the outcome of this consultation, and the Council therefore welcomes further comments.

**PREFERRED OPTION A: AFFORDABLE HOUSING FROM RESIDENTIAL DEVELOPMENT**

Policy to require that residential development on sites with capacity for 10 or more units, or which have an area of 0.25 hectares or greater, will provide generally a minimum 50% of units on the site as affordable homes.

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11 Affordable Housing Viability Study (King Sturge, April 2011)
Of the affordable homes, a minimum 80% must be provided as social rented, with remaining units provided as intermediate housing.

In accordance with Core Strategy Policy CS24, if it can be genuinely demonstrated that this level of provision makes a site unviable, developers and the City Council will work through a cascade approach in the following order until a scheme is made viable:

- firstly, reduce the percentage of affordable housing provided (to a minimum of 40%) by reducing the intermediate housing element only;
- secondly, at 40% affordable housing, reintroduce an element of intermediate housing incrementally up to 20% of affordable units;
- thirdly, make a financial contribution, that would be agreed as the highest figure possible whilst maintaining viability.

On sites with capacity for between 4 and 9 dwellings, a financial contribution will be required towards affordable housing. This would be used to support the provision of affordable housing elsewhere, towards achieving a mixed and balanced community across Oxford.

**Option B**

**A2.106** Option B would be to apply the current 50% on-site Local Plan policy, but reducing the threshold to 4 dwellings. This option, if deliverable and viable, could achieve a mixed and balanced community on most sites, and increase the overall supply of affordable housing. However, evidence from the Affordable Housing Viability Study suggests that many sites of between 4 and 9 dwellings would be unviable.

**OPTION B: AFFORDABLE HOUSING FROM RESIDENTIAL DEVELOPMENT**

Policy to require residential development on sites with capacity for 4 or more units to provide generally a minimum 50% of units on the site as affordable homes.

Of the affordable units, a minimum 80% must be provided as social rented, with remaining units provided as intermediate housing.

In accordance with Core Strategy Policy CS24, if it can be demonstrated that this level of provision makes a site unviable, the Council will work through a cascade approach, as set out in Preferred Option A, until a scheme is made viable.

**Option C**

**A2.107** Option C is to only apply the 50% target for residential units *additional* to those built up to the threshold. For example, if 15 houses and flats were built, 3 of these (50% of 15 minus 9) would be provided on-site as affordable units. As this would deliver far less affordable housing on large development sites, a financial contribution would also be required for each dwelling built up to the threshold of 9.
**OPTION C: AFFORDABLE HOUSING FROM RESIDENTIAL DEVELOPMENT**

Policy to require that residential development complies with the following:

- for sites of 4 to 9 residential units, a financial contribution will be made towards provision of affordable housing. This would be used to support the provision of affordable housing elsewhere, towards achieving a mixed and balanced community across Oxford.

- 50% of all units additional to these first 9 will be provided as affordable housing on the development site. Of this 50%, at least 80% will be provided as social rented units and the remainder as intermediate housing.

In accordance with Core Strategy Policy CS24, if it can be demonstrated that this level of provision makes a site unviable, the Council will work through a cascade approach, as set out in Preferred Option A, until a scheme is made viable.

**REJECTED Option D**

A2.108 The Affordable Housing Select Committee Report recommended that only larger sites of 25 or more dwellings should be expected to provide affordable housing on-site. Below this threshold, a financial contribution should be required.

A2.109 The Council has rejected this option, on the basis that the vast majority of housing sites likely to come forward in Oxford will be for less than 25 dwellings. Hence, most sites would fail to achieve mixed and balanced communities. It would be extremely challenging to deliver affordable housing with the financial contributions that would be generated under this option.

**REJECTED OPTION D: AFFORDABLE HOUSING FROM RESIDENTIAL DEVELOPMENT**

Policy would require that residential development complies with the following:

On sites with capacity for 25 or more units, a minimum 50% of units on the site would be required as affordable housing. Of this 50%, at least 80% will be provided as social rented units and the remainder as intermediate housing.

On sites of up to 24 dwellings, a financial contribution will be made towards provision of affordable housing. This would be used to support the provision of affordable housing elsewhere, towards achieving a mixed and balanced community across Oxford.

**REJECTED Option E**

A2.110 The Council has considered an option that would require developers to contribute to affordable on-site dwellings that would be let under the Government’s new ‘Affordable Rent’ model, instead of social rented homes. The Council concluded however that the new affordable rent model for provision of affordable housing is generally not appropriate for meeting housing needs in Oxford.

A2.111 House prices and market rents in the City are very high against average incomes as a whole for the City. The Council’s analysis has shown that even rents set at 20% below market rents would not be affordable to those in greatest housing need. There may however be a role for affordable rented homes to meet intermediate housing demand.

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12 Oxford Strategic Housing Land Availability Assessment Update Report 1c (Dec 2010)
A2.112 The Council has therefore rejected this option, as it fails to promote mixed and balanced communities, and does not address social exclusion within Oxford.

**REJECTED OPTION E: AFFORDABLE HOUSING FROM RESIDENTIAL DEVELOPMENT**

Policy would require that residential development on sites with capacity for 10 or more units should provide a minimum 50% of units on the site as affordable housing.

Of the affordable units, a minimum 80% must be provided as affordable rented homes, with remaining units provided as other intermediate housing.

On sites of 4 to 9 dwellings, a financial contribution would be required. This would be used to support the provision of affordable housing elsewhere, towards achieving a mixed and balanced community across Oxford.

**Options for calculating a financial contribution**

A2.113 At present, financial contributions instead of on-site provision of affordable housing is only accepted in exceptional circumstances. In such cases, the contribution would currently be calculated using the formula set out in Appendix 5 of the Affordable Housing SPD.

A2.114 Some of the options above would mean many more developments contribute financially rather than providing affordable homes on-site. The Council has therefore considered the ways that these contributions could in future be calculated, and this has fed into the Affordable Housing Viability Study.

**Option (I)**

A2.115 Option (I) sets out a new methodology which seeks to take a financial contribution from new developments of 4 to 9 dwellings.

A2.116 On residential sites it is expected the serviced land required for affordable housing would be provided free of charge. As a rule of thumb, the 30% of the sale price of a new home is the value of the land. On this basis, the financial contribution of 15% of the sales value of all of the new homes on a development site would be required.

A2.117 The contribution would be required after half of the homes have been sold, and before the next one is sold. This improves the cash flow for the development economics, and therefore viability.

A2.118 This approach provides clarity and consistency. Developers and landowners know exactly how much the contribution will be. There is no need for independent viability assessments as the selling price of each house is publicly available.

A2.119 The financial contribution would be used towards the provision of affordable housing elsewhere in Oxford, delivering a mixed and balanced community across Oxford as a whole.

**OPTION (I): FINANCIAL CONTRIBUTIONS FOR AFFORDABLE HOUSING**

Council to require a contribution of 15% of the total market value of the development.

The sum would be payable once 50% of all dwelling units on the site have been sold.

The formula would be:
Option (II)

**A2.120** Option (II) sets out the current methodology for calculation cash in lieu payments which seeks to deliver the equivalent number of affordable units on another site. The calculation seeks to cover the whole cost of providing the units (i.e. land and total build costs including fees) minus the value which the Registered Provider* can afford to pay for the units.

**A2.121** This approach has worked well historically on larger sites. However the viability work has indicated that for small sites (4 to 9 homes) this methodology makes a number of sites unviable.

**OPTION (II): FINANCIAL CONTRIBUTIONS FOR AFFORDABLE HOUSING**

Continue to use the formula in Appendix 5 of the Affordable Housing SPD as a basis for calculating financial contributions. The formula is:

\[
\text{TOTAL NUMBER OF PRIVATE DWELLINGS} \\
\text{multiplied by} \\
\text{BUILD COST OF THE REQUIRED SIZE AND TYPE OF DWELLINGS} \\
\text{plus} \\
\text{LAND COST} \\
\text{minus} \\
\text{THE AMOUNT EQUIVALENT TO WHAT WOULD BE PAYABLE BY A REGISTERED PROVIDER*} \\
\text{equals} \\
\text{THE SUM PAYABLE}
\]

*A ‘Registered Provider’ is an organisation that buys, builds and manages affordable housing, often in partnership with the local housing authority (i.e. local council). They include housing associations.

Option (III)

**A2.122** Option (III) sets out a new methodology based on the difference in value of the development with and without on-site affordable housing. This methodology would require detailed financial viability assessments for every application for sites of 4 to 9 homes. This process would be inefficient and lead to costly process in each case.

**A2.123** The financial contribution would be used towards the provision of affordable housing elsewhere in Oxford, delivering a mixed and balanced community across Oxford as a whole.
**OPTION (III): FINANCIAL CONTRIBUTIONS FOR AFFORDABLE HOUSING**

Council to require a contribution based on the difference between providing 100% market dwellings, and 50% market dwellings and 50% affordable dwellings, on that site. The formula would be:

\[
\text{THE VALUE OF THE SITE WITHOUT ANY ON-SITE AFFORDABLE HOUSING} \quad \text{minus} \quad \text{THE VALUE OF THE SITE WITH AFFORDABLE HOUSING (ASSUMING 80% SOCIAL RENTED UNITS AND 20% INTERMEDIATE UNITS)} \quad \text{equals} \quad \text{THE SUM PAYABLE}
\]

This sum would represent the value of affordable housing development not provided on-site, which would have otherwise benefited the wider community.
Overview of issue

A2.124 The Core Strategy makes clear how provision of affordable housing is important to ensure mixed and balanced communities across the city. The preceding section explains the huge need for affordable housing in Oxford.

A2.125 The Core Strategy also sets out a strategic policy on student accommodation. This policy recognises the implications of Oxford’s large student population on the housing market.

A2.126 Section A4 of this document proposes a preferred option on student accommodation that seeks to limit the location of sites used to develop student accommodation. Nevertheless, there is significant competition for housing sites from those wishing to build student accommodation. This may, in some cases, prevent new homes being built in suitable locations – including affordable housing.

Evidence

A2.127 Evidence is set out in the preceding section showing the extent of the housing affordability crisis in Oxford. People on low and middle incomes are being squeezed out of the property market.

A2.128 A key objective of the Core Strategy is to plan for an appropriate mix of housing tenures, types and sizes to meet existing needs and future population growth. Core Strategy Policy CS23 requires a balanced mix of housing, both within each site and across Oxford as a whole, towards building balanced and mixed communities. However most proposals for new student accommodation provide only for single students, and currently make no contribution towards meeting the needs of, for example, lower income families.

A2.129 The requirement to provide affordable housing does, however, only currently apply to mainstream housing. Hence, if a developer or landowner chooses to build student accommodation instead of housing on such a site, there would be no affordable housing provided, and therefore reduced costs. This may reduce the attractiveness of developing housing on suitable sites.

A2.130 To achieve balanced communities, which include people in need of affordable housing, it is therefore considered appropriate for new student accommodation to make a contribution towards affordable homes.

Preferred Option A

A2.131 Student accommodation meets an important housing need in Oxford, and the Council will continue to encourage new student homes in suitable locations. However, this must be balanced with the need to encourage sites for mainstream housing, particularly affordable homes. Allowing too much student accommodation would restrict the delivery of more family and affordable housing.
Therefore, the Council considers that new student accommodation should contribute more widely to mixed and balanced communities, in the same way as standard residential development. This means making a contribution towards affordable housing, to compensate for the loss of such provision should the site have been used for housing.

The preferred option would establish the principle of student accommodation developments making a financial contribution towards affordable housing provision in Oxford. An appropriate size threshold and delivery mechanism will potentially be established through further joint working with partners. These will take into account the impact on viability, including potential differences between university‐provided and speculative student accommodation.

**PREFERRED OPTION A: AFFORDABLE HOUSING FROM STUDENT ACCOMMODATION**

Include a policy that requires new student accommodation to make a financial contribution towards affordable housing, which would be secured by means of a planning obligation. This would be used to support the provision of affordable housing elsewhere, towards achieving a mixed and balanced community across Oxford.

**Option B**

The current saved policies of the local plan do not require proposals for new student accommodation to provide or contribute towards affordable housing. Option B would maintain this position.

**OPTION B: AFFORDABLE HOUSING FROM STUDENT ACCOMMODATION**

Do not include a policy that requires new student accommodation to make a financial contribution towards affordable housing.
Section A3 Houses and flats

Protecting existing housing

Overview of issue

A3.1 The Core Strategy notes that housing need and demand far exceeds the amount of available and suitable land within Oxford.

A3.2 The benefits of building new housing would be undermined if the stock of housing were to reduce elsewhere in the City. This is why the Council has, through the Local Plan, resisted the net loss of any self-contained dwelling on any site in Oxford.

Evidence

A3.3 Local Plan Policy HS.9 resists the change of use of any part of a self-contained dwelling, except to accommodate a small workspace, primary healthcare facility, nursery, local shop, or guest house.

A3.4 The Council’s records indicate that only a very small number of planning applications have resulted in the net loss of dwellings on a given site. Therefore, it can be concluded that Local Plan policies have been successful in preventing any significant net loss of dwellings.

PREFERRED Option A

A3.5 The preferred option proposes continuing the aims of the Local Plan (Policies HS.9 and HS.10). However it is recognised that work practices are changing, for example more people are choosing to work or start businesses at home.

A3.6 Flexible working practices are supported. Some flexibility is therefore proposed in policy to allow partial loss of dwelling floorspace where this may support small, homegrown enterprises, or vital community infrastructure such as pre-school childcare or local GP practice. The key test will be whether the remaining residential space maintains good living conditions, and maintains the stock of family housing in particular.

A3.7 The City Council’s Balance of Dwellings Supplementary Planning Document sets a minimum 75m² floor area for new family dwellings. This is consistent with standards recommended by the Design Council (formerly Homes and Communities Agency) (see options for Dwelling Space below). This is therefore recommended as the minimum to be retained in residential use.

CORE STRATEGY SAYS...

Spatial Strategy (Section 3.1 - ‘key plank’)

The spatial strategy aims to provide the development required to meet Oxford’s needs, ensuring an appropriate balance of housing and employment growth in the context of other competing land uses. This objective, which forms the third key plank of the spatial strategy, reflects the scarcity of land in Oxford to accommodate the many development pressures faced by the city.

SAVED LOCAL PLAN POLICIES

<table>
<thead>
<tr>
<th>POLICY</th>
<th>DESCRIPTION</th>
<th>SAVE OR DELETE?</th>
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<tbody>
<tr>
<td>HS.9</td>
<td>Change of use of housing</td>
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<td>HS.10</td>
<td>Loss of dwellings</td>
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<td>HH.2</td>
<td>Primary health care facilities in residential dwellings</td>
<td>Save</td>
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<tr>
<td>ED.2</td>
<td>Nursery education and childcare facilities in dwellings</td>
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**PREFERRED OPTION A: PROTECTING EXISTING HOUSING**

Include policy to resist any development that results in the net loss of any whole self-contained dwellings.

The policy would also resist any partial change of use of a self-contained dwelling, unless

- the proposal maintained at least 75m² of the original floorspace as a self-contained dwelling, and
- the internal and external space standards, privacy and living conditions met the Council’s requirements, and
- the scale and nature of the proposed use were compatible with the surrounding area, and not likely to give rise to a significant increase in noise nuisance, traffic or on-street parking.

**Option B**

**A3.8** An alternative option is to roll forward the existing Local Plan Policies HS.9 and HS.10. These policies list a narrow range of specific uses that may be acceptable to justify the partial loss of a self-contained dwelling, and have worked well in the past. However they cross-reference policies HH.2 (Primary health care facilities in residential dwellings) and ED.2 (Nursery education and childcare facilities in dwellings), which are outside the remit of the Sites and Housing DPD.

**A3.9** A much smaller minimum residential element is required for partial changes of use under this option, which would only ever be suitable for a small, single-person household, this leading to the loss of a family-size home. This would however continue the approach set out in the Local Plan.

**OPTION B: PROTECTING EXISTING HOUSING**

Include policy to resist any development that results in the net loss of any whole self-contained dwellings.

The Council would only permit the change of use of any part of a dwelling to:

- a workspace that will not generate significant traffic,
- a primary health care facility,
- a nursery,
- a local shop, or
- a guest house.

In every case of a partial change of use, the need for the proposed use would have to be demonstrated, and a self-contained residential unit of at least 25m² would have to be retained in the building.

**REJECTED Option C**

**A3.10** A third option would be to not include a policy to resist the loss of self-contained dwellings. As this could result in a net loss of housing in Oxford over time, it would conflict with the Council’s objective to meet housing need, and is therefore rejected.

**REJECTED OPTION C: PROTECTING EXISTING HOUSING**

Do not include a policy to protect existing housing in Oxford.
Dwelling space

Overview of issue
A3.11 One of the main themes of the Oxford Core Strategy is improving quality of life. The standard of people’s homes, both within and outside the building, is crucial in meeting people’s everyday needs and expectations.

A3.12 At public consultation, few views were expressed specifically on this issue. There were some general views about the need to avoid too many small units at high densities.

Evidence
A3.13 The internal living space of any proposed new dwelling is one of the first things that will be considered when assessing a proposal. The Council’s planning officers have significant experience in dealing with these issues, and have used their experience in developing these options.

A3.14 At a national level, there is a history of developing minimum internal space standards for new dwellings, particularly for publicly funded affordable housing. These are normally expressed as an overall square meterage per dwelling, measured as gross internal floor area. Most recently, the Homes and Communities Agency (HCA) developed a toolkit approach (the ‘Housing Quality Indicator’) to assess whether new proposals provide adequate internal and external living space, based on a given number of occupants (or ‘bedspaces’).13 The minimum standards used in the assessment model have also informed the policy options below.

A3.15 In relation to private external space, the City Council’s Development Management team have given careful consideration to how Policy HS.21 (Private Open Space) should be applied to different types of development. The results of these discussions have also informed the options.

(A) Internal Dwelling Space

PREFERRED Option A
A3.16 The preferred option is to include a flexible, criteria-based policy for new dwellings. This would not be too prescriptive, but would set an absolute minimum area of 39m² for all types of dwelling, reflecting the HCA ‘Housing Quality Indicator’. This reflects that different dwelling and room sizes will be appropriate on different sites, whilst making clear the Council’s resistance to residential conversions or new-build dwellings that result in overly cramped living conditions for future occupants.

13 HCA Proposed Core Housing Design and Sustainability Standards Consultation (March 2010) http://www.homesandcommunities.co.uk/design-sustainability-standards

Section 7 Housing (introduction)

Good-quality, affordable housing can create stable and secure family lives... Good housing can improve our social, environmental and economic wellbeing. It helps create better communities that can attract investment and skilled workers.
**Preferred Option A: Internal Dwelling Space**

Include a policy in the Housing DPD which sets out general criteria for assessing whether any single proposed residential unit provides adequate internal space to provide good-quality living accommodation for the intended use. Require that no dwelling is built with less than 39m$^2$ of total internal floorspace, and that this minimum standard should generally be exceeded.

Require also that:

- all units will have their own lockable entrance, kitchen and at least one bathroom;
- the space provided within each room allows for reasonable furnishing, circulation and use of domestic facilities for the occupation intended, including for desk-based home working;
- adequate storage units, or space to allow for reasonable storage and clothes drying, are designed in.
- In assessing these, ensure that the following are taken into account:
  - whether adequate ceiling height, natural lighting and outlook allow proper use and enjoyment of the floorspace;
  - whether the dwelling is suitable for use by a family that includes children.

**Option B**

A3.17 Under Option B, a more comprehensive set of minimum floorspace standards are proposed, including for homes specifically designed for families, in light of recent HCA work on space standards. These are consistent with the standard for family homes referred to in the preferred option for Protecting Existing Housing above. The HCA Housing Quality Calculator incorporates the modern space requirements of a comfortably functioning home.

A3.18 It is proposed that a ‘family dwelling’ would be defined as any self-contained house or bungalow of 2 or more bedrooms, or any self-contained flat either with 3 or more bedrooms or otherwise deemed likely to encourage occupation by a family including children.

**Option B: Internal Dwelling Space**

Require that all new residential development meets the following minimum internal space standards (rooms to be measured as gross internal floor area):

- For all self-contained dwellings, the total habitable room space is no less than 30m$^2$, and the total gross internal area of the dwelling is no less than 39m$^2$;
- For family dwellings, the total habitable room space is no less than 50m$^2$, and the total gross internal area of the dwelling is no less than 75m$^2$.

Require that each self-contained unit has its own lockable entrance, kitchen, at least one bathroom and adequate internal storage space.
REJECTED Option C
A3.19 A further alternative would be to roll forward the existing Local Plan Policy HS.11. In most cases a self-contained unit of this size would be considered too small to offer an adequate standard of living, therefore this option has been rejected.

REJECTED Option C: Dwelling Space
Policy to retain existing policy approach as set out in Local Plan policy HS.11, which sets a minimum internal floorspace standard of 25m². Policy wording would be amended to include new-build development as well as conversions.

(B) Outdoor space

PREFERRED Option A
A3.20 A flexible, criteria-based approach is proposed for determining whether adequate provision has been made for private gardens (or equivalent outdoor amenity space). The criteria reflect the experience of development management officers, of which factors have the greatest influence on what makes a proposal acceptable.

A3.21 Local Plan Policy HS.21 (Private open space) includes supporting text that indicates a minimum 10 metre length of garden will generally be expected for family houses. The Council no longer considers that it is necessary to provide a minimum length of garden, as it is the overall size, shape, privacy and context of the garden, rather than the length, which is most important. It is anticipated that flexibility would be applied within certain contexts, for example where proposals are located in the City or district centres, close to a public park, or are for a change of use above a shop unit.

PREFERRED Option A: Outdoor Space
Include policy that generally requires all new dwelling units to have direct and convenient access to an area of private open space. This could be in the form of a private garden or patio, shared private amenity space, balcony or terrace. Require that the following criteria be considered in assessing whether adequate space has been provided:

- The location and context of the development;
- The orientation of the outdoor area in relation to the sun;
- The degree to which enclosure and overlooking impact on the proposed new dwellings and any neighbouring dwellings;
- The overall shape, access to and usability of the whole space to be provided.

Policy would also take account of the type of home proposed, using the following criteria:

- Houses of 2, 3 or more bedrooms should provide a private garden, of adequate proportions for the size of house proposed, for exclusive use by occupants of that house;
- Flats of 3 or more bedrooms should provide either a private balcony or terrace of useable level space, or, in the case of ground floor flats, direct access to a private or shared garden, with some defensible space;
- 2 bedroom flats should comply with the same requirements as 3 bedroom flats, with the exception that access to a private shared garden will be acceptable as an alternative to a private balcony or terrace;
- 1 bedroom flats should provide either access to a private shared garden, or to a private balcony or terrace of useable level space;
• Adequate space and provision should be made in respect of all residential units for the safe, discreet and conveniently accessible storage of refuse, recycling, secure cycle storage and, where appropriate, a motorcycle or scooter.

For this policy option, the terms ‘private garden’ and ‘private shared garden’ mean private amenity areas that are appropriately screened, landscaped and receive adequate natural light, and which exclude side accesses, space used principally for vehicular or cycle parking, waste storage or any other space deemed of limited amenity value.

Any private shared garden would need to be of an appropriate size for the number of units, and number of occupants, who would be using it, and subject to appropriate management controls to ensure proper maintenance.

Option B

A3.22 This option sets specific minima which are drawn from the HCA ‘Housing Quality Indicator’. This option provides more precise guidance, but takes less account of contextual factors.

**OPTION B: OUTDOOR SPACE**

Include a policy that requires all new dwelling units to have direct and convenient access to an area of private open space, using the same definitions as set out in Preferred Option A. Specify the following minimum size thresholds:

- Houses of 2, 3 or more bedrooms should provide at least 22m² private garden for exclusive use by occupants of that house;
- Flats of 3 or more bedrooms should provide either a private balcony or terrace providing at least 6m² of useable level space, or, in the case of ground floor flats, direct access to a private or shared garden, with some defensible space;
- 2 bedroom flats should comply with the same requirements as 3 bedroom flats, with the exception that access to a private shared garden will be acceptable as an alternative to a private balcony or terrace;
- 1 bedroom flats should provide either access to a private shared garden, or to a private balcony or terrace of at least 5m² of useable level space.

Additional provision should be made in respect of all residential units for the safe, discreet and conveniently accessible storage of refuse and recycling.

The policy would further state that these standards would be treated as an absolute floor, with more generous standards expected for larger dwellings or where otherwise appropriate to the context. Adherence to these minima would not necessarily make outdoor space provision acceptable.

Option C

A3.23 Local Plan Policy HS.21 (along with supporting text) has been found to be overly prescriptive in some cases. Nevertheless, the policy has been used with some success to resist development of residential houses that lack adequate provision of useable garden space. It is therefore reasonable to consider rolling forward the existing policy approach.

**OPTION C: OUTDOOR SPACE**

Retain the approach used in the Oxford Local Plan (Policy HS.21), which requires each dwelling to have access to some form of private open space without setting detailed requirements. Family dwellings would generally be expected to have garden length of 10 metres.
Overview of issue

A3.24 One of the main themes of the Oxford Core Strategy is promoting social inclusion and improving quality of life. The way in which houses and flats relate to one another will have a significant impact on both existing and prospective new residents.

A3.25 Privacy and overlooking issues are a common reason for people objecting to developments adjoining or close to their properties. Many of these are small in scale, such as for household extensions, or small infill developments.

A3.26 At public consultation, some people specifically commented on the importance of maintaining privacy for neighbours. Some also highlighted the need to prevent privacy and overlooking problems.

Evidence

A3.27 The City Council’s development management officers have a wealth of experience in dealing with development that may have an impact on privacy and overlooking. This experience has fed directly into the development of the policy options.

A3.28 Appendix 6 of the Oxford Local Plan provides guidance on sunlight and daylight standards. This is based on principles set out in a Buildings Research Council good practice guide, which explains the ‘45° code’. The code is used to broadly assess whether household extensions and other buildings are likely to lead to a significant loss of daylight. Details on the 45° code are shown in Appendix 2: note these have been updated to provide a greater degree of technical accuracy.

A3.29 However, the code is only ever used as an indicative tool, and cannot fully assess whether a new building unduly overbears or overshadows an existing one. In assessing such impacts, the Council will always take account of overall context, orientation of neighbouring properties’ windows, and other factors that may impact on privacy and amenity. This will always require professional judgement, rather than quantifiable standards.

A3.30 The Council has also published a series of technical notes that set out guiding urban design principles that are applied to small household extensions and modifications. These do not form part of the development plan, as they are not applicable in all circumstances, and are intended to be used flexibly.

PREFERRED Option A

A3.31 The experience of officers is that Local Plan policies have been fit-for-purpose, as they provide flexibility for decision-makers to assess proposals on their merits. The particular circumstances and context will generally be different for each proposal. The existing policy criteria include some well-established principles, to ensure key material factors are taken account of when developing close to existing residential properties.

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14 See Oxford City Council website: www.oxford.gov.uk/PageRender/decP/Pre-Application_Advice_occw.htm
A3.32 The preferred option consolidates these key principles to apply specifically to residential development. The aim of the preferred option is to propose a clear and user-friendly set of criteria for developers, decision-makers and neighbours.

**PREFERRED OPTION A: LIVING CONDITIONS (PRIVACY AND DAYLIGHT)**

Include a policy which states that all new residential development will be assessed for its impact on residential amenity including outlook, privacy, and exposure to sunlight and daylight, in respect of both existing and new dwellings. Policy would require that the following are considered in assessing compliance with this:

- impact on the functional needs of all dwellings, including internal and external circulation and amenity space;
- degree of overlooking to and from neighbouring properties or gardens, in a way that significantly compromises privacy;
- orientation of neighbouring properties’ windows in relation to the new development, in respect of access to sunlight and natural light to both existing and new dwellings, and solar gain;
- whether development is of an overbearing nature, including the degree of enclosure resulting from development;
- changes to boundary treatments such as fences and hedges;
- likelihood of significantly increased nuisance as a result of noise or light disturbance to existing or prospective new residents.

In respect of access to sunlight and daylight, the Council would use as guidance the ‘45° code’. However the policy would be clear that compliance with the 45° code does not necessarily make a proposal acceptable.

**Option B**

A3.33 An alternative option considered would involve setting out more prescriptive design standards, aimed at providing a high degree of certainty for developers and decision-makers. The drawback with this approach would be using a ‘one-size-fits-all’ approach to a multitude of different contexts. It would in particular be difficult to apply in high-density neighbourhoods, or on constrained sites that nevertheless offer opportunity for well-designed, sustainable development.

**OPTION B: LIVING CONDITIONS (PRIVACY AND DAYLIGHT)**

Set out a policy that requires all residential development to be assessed against a detailed technical design guide, within an appendix to the Housing DPD. This would draw on evidence from the Building Research Council and the City Council’s informal design guidance leaflets, and specify standards relating to:

- generally applying the 45° rule;
- minimum garden to building ratios;
- minimum separation distances between the fronts and rears of houses and blocks of flats, and between windows to habitable rooms;
• the depth and bulk of rear extensions to terraced houses;
• specify minimum separation distances between side walls for detached and semi-detached houses.

Policy would also state any other considerations that may be material to impact on privacy, outlook and amenity. The policy criteria would not be presented as exhaustive.

REJECTED Option C
A3.34 An option of not including a specific policy on living conditions for neighbours was considered. This would rely on developers and decision-makers referring to national planning guidance and best practice, and the Core Strategy, in designing and assessing proposals. This option was rejected, given the importance of neighbours’ amenity, and uncertainty over the future form of national planning policy.

REJECTED OPTION C: LIVING CONDITIONS (PRIVACY AND DAYLIGHT)
Do not include a policy on living conditions (privacy and daylight).
Section A4 Specialist forms of housing

Student accommodation

Overview of issue

A4.1 The provision of new purpose built student accommodation provides the opportunity to relieve pressure from the private housing market.

A4.2 New purpose built student accommodation is needed if both Universities and private colleges are to provide accommodation for their students. However the City Council recognises that post-graduate students may have different requirements and needs that their under-graduate counterparts.

A4.3 Managing the location of new purpose built student accommodation on unallocated sites is an important part of delivering Core Strategy policy CS25.

A4.4 The Local Plan approach has been altered by the adoption of the Core Strategy. Occupancy restrictions (ensuring occupancy for one of the two Universities) are no longer in place for speculative student accommodation.

A4.5 There was a general feeling from the public consultation that the concentration of students was too high in particular parts of the City (mainly East Oxford and Headington). There was mixed opinion regarding what to do about new student accommodation. Some people were supportive, whereas others felt that the only way to promote balanced communities in Oxford was to prevent further expansion of University students. Of particular concern was parking pressure being exacerbated by student accommodation. It was felt that strict curbs on car use by students were important.

A4.6 It should be noted that the City Council is proposing to introduce a policy that would require student accommodation developments to make a contribution towards affordable housing in Oxford. This is set out in Section A2.

Evidence

A4.7 The options presented here respond to both the public consultation and to the changes made to the Core Strategy. A decision has been made to include location-based criteria to guide new student accommodation to appropriate locations across the City.
PREFERRED Option A

A4.8 This policy option aims to direct student accommodation away from residential areas and towards areas that are generally busy in order to minimise the noise and disturbance created by students passing residential properties late at night.

A4.9 It would also ensure that students had access to the local transport network which would assist in the national planning objective of reducing the need to travel. This would encourage walking, cycling and public transport by being prescriptive about the broad locations where student accommodation is acceptable.

A4.10 The approach also protects against the conversion of existing purpose-built student accommodation and provides flexibility for a range of sites to come forward.

A4.11 Student accommodation should be well designed and in accordance with policies on urban design found elsewhere in the LDF. Larger developments above a threshold of 20 student rooms should provide communal space, such as a common room, to ensure a high standard of occupier amenity.

PREFERRED OPTION A: STUDENT ACCOMMODATION

Include a policy to expect development to be located in one of the following areas:

- on or adjacent to an existing college, University campus or other campuses with teaching facilities (e.g., hospitals); or
- in the City centre or a District centre; or
- located directly adjacent to a main thoroughfare that has a good bus service in Oxford (see definition below); or
- on allocated sites.

Exceptions would only be considered if it can be demonstrated that development would not lead to an unacceptable increase in movement of students past residential properties off the main thoroughfares.

Larger developments (over 20 bedrooms) will be expected to provide an area of communal space within the development such as a student common room.

All developments would be subject to a planning condition or legal agreement that a management regime be implemented on site, from first occupation and on an ongoing basis.

With regard to existing student accommodation, require no loss of purpose built student accommodation to any other use.

A4.12 For the purposes of this policy option, Main Thoroughfare is defined as a main radial route, or cross-route which serves as a main connector between radial routes, including the B4495 ‘inner ring road’ but excluding all routes that do not have a bus service with a minimum 15 minute daytime frequency, and excluding the main ring road (i.e., the A40, A4142, A423 and A34).

Option B

A4.13 Option B would rely on the Core Strategy and Site Allocations for the provision of student accommodation. This would allow flexible assessment of planning applications for new student accommodation.
on their merits. However there would potentially be fewer safeguards of residential amenity and less control over developments on unsuitable sites.

**OPTION B: STUDENT ACCOMMODATION**

Do not include a specific policy for student accommodation proposals.

**REJECTED Option C**

**A4.14** It could be argued that Option C would ensure that the institutions in question had control over the land that they were developing prior to the development proposals taking place. Sites that are owned by or in the control of the institutions that wish to occupy the development have a high certainty of being delivered for that specific purpose.

**A4.15** However in a small city such as Oxford, with competing interests for available land, there is likelihood that such restrictions could stifle the delivery of purpose built student accommodation for the very institutions that are trying to reduce the number of full-time students in the private rented sector, in particular the two universities. For this reason, this option has been rejected.

**REJECTED OPTION C: STUDENT ACCOMMODATION**

Require that, outside those sites specifically allocated for student accommodation in the Site Allocations DPD, the following criterion is applied to development proposals for student accommodation:

- that it is only provided on sites that are owned or controlled by the institution that would occupy the development.
Houses in multiple occupation

Overview of issue

A4.16 On 6 April 2010, amendments were made to the Use Classes Order and the General Permitted Development Order to introduce, among other things, a new class of residential development – C4: Houses in Multiple Occupation. These are commonly referred to as ‘small HMOs’. The Sui Generis HMOs which existed under the previous legislation are still considered as HMOs, but these are now commonly referred to as ‘large HMOs’ which, in broad terms, consist of more than six occupants.

A4.17 The new use class – C4: Houses in Multiple Occupation describes a house that contain between three and six unrelated occupants who share basic amenities. However, properties that contain the owner and up to two lodgers do not constitute HMOs for these purposes.

A4.18 Oxford has the 15th highest number of houses in multiple occupation, or HMOs in England and Wales. HMOs play an important role in meeting people’s housing needs in Oxford. However, in some cases high concentrations of HMOs, often linked with students, can be associated with parking problems, accumulations of domestic rubbish and, sometimes, late night noise disturbance. They also reduce the number of houses available for family households, and therefore have a significant impact on the wider housing market.

A4.19 Currently the City Council has no control over conversions of single dwellings into a small HMO that falls within planning Use Class C4. However from February 2012, a new local planning order, known as an ‘article 4 direction’, will give the Council planning controls over all new HMOs. The Council will therefore introduce a new planning policy, to provide a framework for deciding whether or not to grant planning permission for any new HMO.

A4.20 In January 2011, the City Council was the first local authority in the Country to introduce full ‘additional’ licensing for all existing and new HMOs. This will improve the condition and management of HMOs across the City, and within the next three years should provide a record of the majority of HMOs in Oxford.

A4.21 Public consultation suggested general support for introducing a greater level of control for new HMOs. However, some people felt that better management of HMOs would be preferable to imposing greater planning restrictions.

Evidence

A4.22 Core Strategy Policy CS25 requires that all increases in university academic or administrative accommodation are matched by increases in purpose-built student accommodation. It also requires that the number of full-time students living outside of purpose-built student accommodation be restricted to 3000. The policy is broader than the Local Plan policy that it replaced since the occupation of student accommodation is now restricted to students in full-time education on academic courses of one academic year or more. This now includes students on full-time courses enrolled at language schools as well as at the two universities.
A4.23 Oxford Brookes University has recently announced that they will be charging £9,000 a year for tuition fees from 2012. As a result of this, Oxford Brookes is looking to improve the university experience for their students. One of the consequences of this is that there are likely to be lower undergraduate numbers.

A4.24 Oxford has the highest number of students, as a proportion of the local population, of any place in the South East region. This contributes to the city’s vibrant private rented sector: at the time of the last Census, 26% of households were privately rented. It is estimated that some 5,000 households in Oxford are HMOs, which represents about 8% of all households. About 5% of all households are occupied solely by students, therefore an estimated 60% of all HMOs are student properties (approximately 3,000 properties).

A4.25 Some areas of Oxford are known to have particular concentrations of HMOs. This has been demonstrated by mapping the distribution of student properties (i.e. households that are exempt from paying Council Tax). Figure 2 shows that there is a particularly high concentration of student households in East Oxford, Jericho and the City centre. This can be compared with a map analysis of complaints to the City Council’s Environmental Health team that are thought to relate to HMOs (Figure 3). Comparison of the two maps suggests a relationship between the two.

Figure 2: Proportion of student properties exempt from Council Tax due to sole occupation by full time students (excluding halls of residence), February 2010
PREFERRED Option A

**A4.26** The Core Strategy has strategic objectives both to improve quality of life for all, and to achieve an appropriate housing mix to support strong and diverse communities. It is also important that the city continues to provide flexible forms of accommodation to support a dynamic Oxford population, which includes both a large number of students and many young professionals: these groups often struggle to afford the cost of living in self-contained households.

**A4.27** Planning policy should therefore strike a balance between flexible, affordable accommodation and the need to sustain a balanced and established community. As such, the preferred option puts forward a threshold for the proportion of properties, within a particular segment of street, which may become HMOs. The City Council considers that allowing the number of HMOs to exceed this threshold would represent a potential over-concentration of HMOs. Therefore, creation of any further HMOs above the threshold would be resisted.

**A4.28** Currently, a blanket restriction on HMO creation applies in the former ‘East Oxford Registration Zone’. The application of a robust threshold-based policy, supported by evidence from HMO licensing records, would generally prevent further HMOs being created in this area. Therefore, the preferred option would no longer require the ‘East Oxford HMO Registration Area’ which would be deleted from the Proposals Map.

**PREFERRED OPTION A: HOUSES IN MULTIPLE OCCUPATION**

Policy to state that any proposal to create a new HMO, including the change of use of any dwelling to an HMO, will only be permitted where the proportion of properties within 100 metres of street length either side of the property does not exceed 20%.
Street length will be measured to include:

- the frontage either side of the proposed development, including frontage that wraps around corners or that is bisected by a road or footpath, and
- the frontage either side of the point directly opposite the proposed development, including frontage that wraps around corners or that is broken by a road or footpath.

Policy to require full compliance with the City Council’s guidance on amenity and facilities in HMOs (published by Environmental Development). Require that any new HMO includes refuse storage space that is adequate in size and accessible, and that adopted policy for car and cycle parking is complied with.

For the avoidance of doubt, the policy would state that the Council will seek to prevent any HMO that has formerly been a single household dwelling from being converted to smaller self-contained units, unless the proposal complies with the Balance of Dwellings SPD.

**Option B**

**A4.29** The Local Plan includes Saved Policy HS.15 – Houses in Multiple Occupation, which uses a street threshold-based approach. It also seeks to prevent any further HMO creation within the former ‘East Oxford HMO Registration Area’ (a large area shown on the adopted Proposals Map that covers the East Oxford area surrounding Cowley Road and Iffley Road).

**A4.30** This option carries forward the existing Local Plan policy, and therefore represents the ‘business as usual’ option. It should, however, be noted that the Local Plan policy only currently applies to proposals for HMOs classed as ‘Sui Generis’ (generally 7 or more occupants). From February 2012, the policy would also apply to small ‘Class C4’ HMOs (generally 3 or more unrelated occupants).

### OPTION B: HOUSES IN MULTIPLE OCCUPATION

Maintain a maximum threshold of 25% of properties in any single street as a proportion of total units permitted to become HMOs (either C4 or Sui Generis). Within the former East Oxford Registration Area as defined on the adopted Proposals Map, do not permit any change of use to or creation of additional HMOs.

Policy would also require:

- appropriate provision to be made for car and cycle parking;
- adequate levels of amenity for occupiers;
- refuse storage space that is adequate in size and accessible, and
- that good access into, and within, the building is retained.

**Option C**

**A4.31** An option is put forward that would extend the existing area of constraint – the former ‘East Oxford HMO Registration Area’ – to include all areas that are shown to currently have more than 10% of properties exempted from Council Tax due to student occupation. This would update a boundary that was based on the former mandatory HMO licensing regime, that is now superseded by additional licensing. Within the updated
area, all proposals for HMOs would be resisted. Outside the area of constraint, a threshold of 20% of properties within a 100m length of street would be applied.

**OPTION C: HOUSES IN MULTIPLE OCCUPATION**

Policy to state that any proposal to create a new HMO, including the change of use of any dwelling to an HMO, will only be permitted where the proportion of properties within 100 metres of street length either side of the property does not exceed 20%.

(See Preferred Option for how this could be defined.)

Within an area that has more than 10% of properties as Council Tax exempt due to student occupation, do not permit any change of use to or creation of additional HMOs. (Note this is likely to include areas shown in blue in figure 2 above.)

**REJECTED Option D**

**A4.32** The City Council has considered the option of not having any planning policy that restricts or seeks to influence the number of HMOs in Oxford. This option has been rejected, as it is not considered to meet the objective of improving the balance of accommodation and communities in Oxford and its neighbourhoods.

**REJECTED Option D: HOUSES IN MULTIPLE OCCUPATION**

Do not include a policy to manage the creation of new HMOs in Oxford.

**REJECTED Option E**

**A4.33** A further option would have been to resist the creation of any further HMOs in Oxford. The Council considers this would not be a sustainable approach. There will always need to be some flexibility in residential tenure and household composition, given the high student population in Oxford, including postgraduates, and affordability issues faced by young, economically active professionals.

**A4.34** An entirely restrictive policy may also have the perverse effect of discouraging landlords of existing HMOs to rent to families. The reason is that family occupation would constitute a C3 use, therefore C4 (HMO) use of the property would be lost, leaving no option of reverting the property back to HMO use, as planning permission would be refused.

**REJECTED Option E: HOUSES IN MULTIPLE OCCUPATION**

Policy to set a presumption against any further development of HMOs in Oxford.
Key worker housing

Overview of issue

A4.35 In Oxford, around 46% of workers are employed in the public sector and higher education. The City has a high concentration of hospitals, as well as the main offices for the City and County Councils. A significant number of these, including many occupations based in hospitals and local authorities, are classed as ‘key workers’.

A4.36 The concept of key worker housing is to ensure those working for particular organisations, which have local recruitment or retention difficulties, are more able to live in the area.

A4.37 Both affordable and market housing can be classed as key worker housing. Key workers can be in housing need and therefore qualify for affordable housing, or purchase key worker housing on the open market.

Evidence

A4.38 Planning Policy Statement 3 – Housing (PPS3) provides a definition of key workers, which refers to eligibility for Key Worker Living programmes plus others employed within the public sector identified by the (former) Regional Housing Board. In summary, these include the following broad occupations:

- clinical NHS staff;
- teachers and nursery nurses;
- police, probation and prison officers;
- some local authority officers;
- firefighters;
- some military services personnel.

A4.39 In Oxford, around 27% of the workforce is employed in the public sector (i.e. by local councils or the Government), within which the occupations listed above would fall. However a further 19% are employed in the higher education sector, including lecturers, academic researchers and administration staff. Higher education has, in common with public sector, faced challenges for staff recruitment and retentions. These occupations are also considered vital for Oxford as a World Class City.

A4.40 Housing for key workers is not in itself defined as affordable housing (as defined in PPS3 and the Core Strategy). Some key workers (for example, these on a low income) may nevertheless qualify for affordable

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housing as much as anyone else with a particular housing need. Other key workers who do not have a priority housing need would not qualify for affordable housing.

A4.41 Due to the high level of housing need in Oxford, the City Council believes that people in key worker occupations should not be given as high priority as those in greatest housing need (i.e. households that qualify for social rented housing). As set out in the Core Strategy, the Council will therefore no longer accept key worker housing as a substitute for the general requirement for affordable housing provision.

A4.42 However, the Council remains supportive of public sector and higher education employers providing staff accommodation, aimed at key workers, where they choose to develop land, provided that the normal requirement to provide affordable housing is met. The Council accepts that affordable housing provided in this way may be conditioned to prioritise occupation by key workers, as long as those key workers also qualify for affordable housing. In particular, intermediate types of housing are often attractive to key workers.

Definition of Key Worker

A4.43 The City Council proposes to set a local definition of ‘key worker’ for the purposes of the policy options set out below. This definition would include all those who are currently eligible (as summarised in the list above), and additionally would include certain occupations within the higher education sector. These are likely to include all staff of Oxford Brookes University or the University of Oxford who are lecturers, researchers, readers, technicians or perform a specialist administrative role, who are in the payroll of the relevant university.

A4.44 The City Council will work with the relevant bodies to refine this definition ahead of proposed submission of the development plan document.

PREFERRED Option A

A4.45 Given Oxford’s constrained land supply, and a worsening housing crisis, there is a need to prioritise affordable housing. The Council considers there are sufficient ways of delivering housing restricted to key workers, including both affordable and market housing, without the need for a specific policy requirement. It is therefore proposed that this policy be deleted from the Local Plan.

PREFERRED OPTION A: KEY WORKER HOUSING

City Council would adopt a local definition of key worker as set out above, to additionally include some higher education staff. The Council would set out its support for key worker housing schemes, on condition that its provision is in addition to the level of affordable housing required in other DPD policies.

Option B

A4.46 Option B would take forward the existing local plan policy. Policy HS.16 in the Local Plan seeks to deliver key worker housing as part of staff accommodation, but does not require affordable housing where the developer has entered into a key worker agreement with the City Council. This approach reflects the benefits of these employers providing staff accommodation on their own land, thus addressing staff retention issues and easing the general housing situation in Oxford.
**OPTION B: KEY WORKER HOUSING**

Include a policy which requires new residential development on land owned or controlled by an employer that has entered into a key worker agreement with the City Council (using the proposed local definition as set out above) provided:

- at least 80% of the residential units to be created are to be subject to a planning obligation limiting occupation to those eligible for key worker housing (as defined);
- the site is not designated as a protected employment site under Policy CS28; and
- the site is not likely to be needed for the operational purposes of the employer.

To avoid doubt, such developments will be exempt from Core Strategy Policy CS24 – Affordable Housing.
Residential moorings

Overview of issue
A4.47 Residential moorings may contribute to the overall supply of housing across the City.
A4.48 The acceptability of new moorings will depend on site circumstances, but they must comply with other policies in the LDF.
A4.49 The consultation highlighted that some people felt that alternative forms of low-impact housing should be promoted. Suggestions included more residential boat moorings.

Evidence
A4.50 It is known that there is a need for both residential moorings and visitor moorings in the City. Residential moorings are each occupied on a long-term basis by a permanent resident of the area, whereas visitor moorings are short-stay (usually 24 or 48 hours) for visitors to the City. Given the fact that there is only a limited amount of acceptable space along the waterways for any type of moorings, there is a need to balance the needs of visitors to the city with the need of residents. This section deals with the issue of residential moorings rather than visitor moorings.

A4.51 In 2010, some work was undertaken by Oxford Brookes University Joint Centre for Urban Design on behalf of British Waterways, exploring opportunities for canalside regeneration. This has informed continuing discussions between the City Council and other stakeholders aimed at ensuring good management of Oxford’s waterways. These round table discussions will further feed into the final draft policy on residential moorings.

PREFERRED Option A
A4.52 The preferred option closely reflects the current Local Plan Policy HS.17. This ‘business as usual’ approach provides a range of criteria which are considered appropriate for dealing with proposals for new residential moorings.

PREFERRED OPTION A: RESIDENTIAL MOORINGS

Include a policy indicating support for new residential moorings on Oxford’s canal and two rivers, on condition that the following criteria are met:

- they do not conflict with British Waterways or the Environment Agency’s operational requirements;
- there is adequate servicing including water supply, electricity, and disposal facilities for sewage and rubbish;
- there is adequate car parking if required;
- there is adequate access for emergency vehicles, and
- there will be no significant effect on the amenity and conservation interest of the waterway.

CORE STRATEGY SAYS...

Section 7.2
To build up lifetime communities, the City Council will plan for a mix of housing, particularly in terms of tenure and price for a mix of different households. The housing must be appropriate to the needs of the community, providing a range of types, sizes and tenures including housing for the elderly, lifetime homes and other specialist housing needs.
**Option B**

**A4.53** Option B proposes no policy on residential moorings in the Housing DPD, on the basis that policy criteria on design, amenity and other issues set out elsewhere in the LDF are sufficient to determine whether applications for residential moorings are appropriate.

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