

APPENDIX 1

Table of consultation representations on Balance of Dwellings SPD

Section / paragraph / Page heading	Objector/ Comment Ref. no.	Summary or representation	Officer response	Officer recommendation
WHOLE DOCUMENT				
Whole doc.	SEERA CR 1	The Assembly considers that the SPD is in general conformity with the adopted RSS and the emerging RSS.	Conformity noted.	No change to the SPD.
Whole doc.	GOSE CR2/1	Comment: If the wider aim is to create and maintain balanced communities through the development of appropriate levels and forms of development, then the SPD guidance needs to reflect the visions for Oxford and its individual communities and not a formulaic approach to development management.	The broad aim of this SPD is to promote choice of housing size and type to ensure that everyone has the opportunity of living in a decent home within a community where they want to live. Recent trends suggest that the market alone is not providing this range of housing provision, and therefore this policy framework is required to meet the needs of existing and future Oxford residents to redress a clear imbalance.	Addition to text to include reference to the vision set out in the Core Strategy.(Para. 4A).
Whole doc.	GOSE CR2/2	Comment: Wonder how the SPD and its application will evolve over time, as information about the composition of, and needs of, your communities also evolves. Would this be covered in your AMR, and if so what indicators would be used to assess success of SPD, and what benchmarks would be used to	The Annual Monitoring Report (AMR) provides a range of key indicators on housing provision to monitor the amount and type of housing that is being delivered both by the market and affordable housing. The AMR also provides a commentary on the indicators and an explanation of the	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.

		trigger a review or change of policy.	causes of any key changes.	
Whole doc.	GOSE CR2/5	Comment: Although Policy HS.8 refers to the needs of specialist groups, such as the elderly, it is not clear how the SPD seeks to make specific provision for these groups.	The SPD seeks to provide a balanced mix of dwelling types and sizes to meet the future needs of different households, including families, single people and older people. The policy guidance therefore provides a range of percentages for each principal dwelling size, to allow choice for a variety of potential residents. New dwellings and conversions are encouraged to be designed to meet the needs of residents to 'life' standards, offering the opportunity to remain in their properties for longer periods if they wish. There are some sectors, such as the elderly that may need further purpose-built provision in the future ranging from sheltered housing to residential care homes, however this provision goes beyond the remit of this SPD and will be met through the Allocated Sites DPD.	No change to the SPD.
Whole doc.	Natural England CR 28/1	No comment	Noted	No change to the SPD
Whole doc.	Kidlington Parish Council CR 53/1	Comment: Supports the ideal of achieving a balance of dwellings.	Noted	No change to the SPD
Whole doc.	Kidlington Parish Council CR 53/2	Comment: No reference to locations outside Oxford city, nor to the likely urban extension at Grenoble Road.	The guidance provided in this SPD can only relate to the administrative area of Oxford City Council. However it does provide useful strategic guidance for the development of future residential sites,	No change to the SPD

			such as the possible urban extension.	
Whole doc.	West Waddy ADP CR 56/1	Objection: This SPD would cause harm to affordability. Developer best placed to respond to market demand. If demand in Oxford is not met then impact will be on the local market outside where more spending power available. It will also exacerbate affordability crisis in the City, failing to meet housing need, and damaging Oxfordshires' economy. Overall approach contrary to objectives of Core Strategy and Government guidance.	The SPD highlights recent trends in housing supply, which show that the majority of new build is largely one and two bed flats and a growth in conversions of the existing stock of family housing. The supply of market housing does not therefore appear to be meeting existing or future need. A balanced mix of dwellings is not being provided, and if it continues would not meet the advice of Government to promote the development of mixed and sustainable communities. Objective 5 in the emerging Core Strategy (DPD) aims to "ensure an appropriate mix of housing tenures, types and sizes to meet existing needs and future population growth as far as possible."	No change to the SPD.
Whole doc.	West Waddy ADP CR 56/2	Objection: Policy HS.8 does not require this SPD. It is considered to be <u>unsound, unnecessary and should be withdrawn.</u>	Policy HS.8 seeks to ensure an appropriate mix of dwellings for new residential developments to ensure a balanced distribution of dwelling types both within the site and its locality. At present however there is no advice available to determine the appropriate mix, this SPD aims to provide the advice necessary.	No change to the SPD.
Whole doc.	West Waddy ADP CR 56/3	Objection: Achieving a suitable mix of dwellings should be determined on a site by site basis. In the context of all material planning considerations relevant to the	The Policy guidance in this SPD seeks to provide a strategic spatial dimension which respects the location of a site within the City, District or	No change to the SPD.

		site.	Neighbourhood Area. The percentage of each type of accommodation varies accordingly to respect for example the need for higher densities in the City and District centres and therefore a higher proportion of smaller units. The guidance for Neighbourhood Areas is provided through the 'traffic-light' model approach which takes account of the pressures that exist within the local area.	
Whole doc.	West Waddy ADP CR 56/4	Objection: Policy approach would cause harm to land supply. The impact on smaller sites (less than 10 units) in particular is sensitive to financial viability, which does not appear to have been properly tested. This could reduce supply small sites coming forward, which play a significant role in meeting Oxford's housing need. Questions whether the proposed SPD is therefore sound.	Viability testing on a range of sites has been undertaken. The implementation of this SPD will also be monitored through the AMR. This will assess whether the amount and type of housing being delivered annually is being adversely influenced by the SPD. The policy approach taken has sought to provide considerable flexibility through the percentage range of particular dwelling sizes. Furthermore in the case of new residential developments it does allow for either houses or flats to be provided.	No change to the SPD.
Whole doc.	West Waddy ADP CR 56/6	Objection: Draft SPD creates uncertainty by not setting out how the strategy would be introduced. Financial viability and pre-application discussions would be undermined. Consider a suitable timetable (one year) should be allowed between adoption and determination of applications to ensure time for market to	As in the preparation of any SPD the weight to be attached to the policy guidance would increase as it moved towards adoption. This policy guidance is to supplement an existing adopted Policy HS.8, which requires a mix of dwellings on all sites.	No change to the SPD.

		adjust.		
Whole doc.	West Waddy ADP CR 56/7	Objection: This strategy does not take into account the implications of new land releases set out in the Panel's Report into the draft Regional Spatial Strategy.	The policy guidance in paragraphs 69 and 70 do refer to the proposed mix for large strategic sites. Sites of this size are considered to be required to provide an appropriate mix for a self contained community. This approach is highlighted in the supporting evidence set out in the background paper. However at this stage the Panel's Report in relation to a possible 'urban extension' is a recommendation only, and even if accepted by GOSE is outside the City Council's administrative boundary.	No change to the SPD.
Whole doc.	Northway Tennants & Residents Association CR 80/1	Support: Excellent document.	Noted.	No change to the SPD.
Whole doc.	Headington Residents Assoc. CR 86/1	Support: Supports the aim of avoiding the loss of family housing.	Noted.	No change to the SPD.
Whole doc.	Kier Property and Worcester College CR 126/1	Support: Supports the general aim of the SPD to encourage a mix of dwellings together with an increased proportion of 'family housing,' in appropriate locations.	Noted.	No change to the SPD.
Whole doc.	Kier Property & Worcester	Objection: Appropriate mix of dwellings should be	Adopted Local Plan Policy HS.8	No change to the SPD.

	College CR 126/9	determined by Site Allocations DPD or Area Action Plan.	requires an appropriate mix of dwellings to be provided for new residential developments. This SPD seeks to provide further detailed guidance on the mix based on the location of the site and the number of units to be accommodated.	
Whole doc.	Highways Agency CR 346/1	Comment: No comment.	Noted.	No change to the SPD.
Whole doc.	Home Builders Federation CR 139/1	Objection: This draft SPD is contrary to advice in PPS12 (Para 2.44), since it does more than simply expand or supplement existing adopted policy. It introduces a raft of onerous and prescriptive policy requirements that should be tested through the DPD process.	This draft SPD seeks to provide detailed guidance on adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types, both within a site and within each locality. It is also in line with emerging policies relating to housing growth and future provision within the Core Strategy 2026. This policy approach is consistent with national and regional policies as set out in this SPD. The preparation of this SPD has been undertaken in accordance with the statement of community involvement.	No change to the SPD.
Whole doc.	Home Builders Federation CR 139/9	Objection: SPD should be <u>substantially amended</u> to deal only with issues directly referred to in HS.8 and supporting text. In the meantime this draft SPD should be <u>withdrawn</u> .	This draft SPD seeks to provide detailed guidance on adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types, both within a site and within each locality.	No change to the SPD.
Whole doc.	North Hinksey Parish Council CR 22/1	Comment: No comments.	Noted.	No change to the SPD.

Whole doc.	Rectory Homes CR 00017/1	Objection: The policy aim of this SPD is to ensure a mix of dwelling types and avoid a predominance of one form of housing (3 bed houses). The current market trend of replacing these with 1 & 2 bed units is equalising this balance and achieving social cohesion.	The supporting evidence set out in the background paper assessed in detail the market trends in housing supply. This clearly showed that smaller units (ie.1 & 2 bed) represents the vast majority of new residential developments coming forward. Not only are there few 'family' dwellings being built but the existing stock is also being converted to smaller units. This represents an unsustainable trend.	No change to the SPD.
Whole doc.	Rectory Homes CR 00017/3	Objection: Whilst it is recognised that the stock of 3 bed units is decreasing as a result of redevelopment and conversions the SPD makes an unevidenced 'leap of faith' that this requires some policy intervention to redress non-existent imbalance.	The background paper ' the 'Balance of Dwellings Study' provides the detailed supporting evidence to justify the policy approach advocated in this SPD.	No change to the SPD
Whole doc.	Rectory Homes CR 00017/5	Objection: The clear evidence in both the SPD and supporting background paper is that with household size reducing the greatest need is for single persons dwellings. This need is already met by the market without policy intervention. The approach adopted will fail to secure the balance sought by the Local Plan.	The supporting evidence set out in the background paper assessed in detail the market trends in housing supply. This clearly showed that smaller units (ie.1 & 2 bed) represents the vast majority of new residential developments coming forward. Not only are there few 'family' dwellings being built but the existing stock of 'family dwellings is also being converted to smaller units. These trends show the market is not producing a sustainable mix of housing.	No change to the SPD.
Whole doc.	Rectory Homes	Objection:		

	CR 00017/7	The South East Panel have recommended a major Green Belt review to the south of Oxford, and provision for 4,000 dwellings in an urban extension. This will provide for a mix and type of dwelling that will meet any need for 3 bed dwellings.	The policy guidance in paragraphs 69 and 70 do refer to the proposed mix for large strategic sites. Sites of this size are considered to be required to provide an appropriate mix for a self contained community. This approach is highlighted in the supporting evidence set out in the background paper. However at this stage the Panel's Report in relation to a possible 'urban extension' is a recommendation only, and even if accepted by GOSE is outside the City Council's administrative boundary.	No change to the SPD.
Whole doc.	Rectory Homes CR 00017/8	Objection: This draft SPD is a 'political tool' and development control policy designed to preserve the character and form of areas amid concerns that market forces are adversely effecting these areas. It is ill-thought and ill-conceived and will fail to meet actual need, not provide a balance of house types and only further reduce the stock of housing coming forward.	This draft SPD seeks to provide detailed guidance on adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types, both within a site and within each locality. It is therefore considered to be positive document that seeks to maintain and enhance sustainable communities.	No change to the SPD.
Whole doc.	Oxford Consumers Group CR 1461/1	Support: Agree with and support the document in principle.	Noted.	No change to the SPD.
Whole doc.	D. Beasley Architect CR 00016/6	Objection: This SPD is politically motivated and bears little relationship with the reality of market forces and current needs of society.	This draft SPD seeks to provide detailed guidance on adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types, both within a site and	No change to the SPD.

			within each locality. Recent market housing supply trends clearly show that there will be a mismatch between need and supply.	
Whole doc.	Fairview New Homes Ltd (Fairview) CR 376/5	Objection: Consider this SPD should <u>not be adopted</u> but made clear that there will always be an appropriate level of flexibility for house builders to determine the requirements of a site based on market and commercial considerations.	This draft SPD allows the prospective developer a reasonable measure of flexibility in being able to choose the balance of dwelling units in providing some family housing units together with an allowance for smaller units, within a defined range.	No change to the SPD.
Whole doc.	Highfield Road Residents Association CR 172/1	Support: The Association represents approximately 450 households in Headington and wholeheartedly endorses the principles and approach set out in this document.	Noted.	No change to the SPD.
Whole doc.	Dr. Liz Fisher CR 00019/1	Support: The general policy approach in this new SPD is strongly supported. The conversion of houses to smaller flats and the building of new small 1 and 2 bed flats has caused a serious imbalance to the balance of dwellings in East Oxford area.	Noted.	No change to the SPD.
Whole doc.	Demarcation CR 00021/6	Objection: Concern that the LPA is using SPD's to alter adopted Local Plan policy. This is not consistent with national guidance in Para 2.44 of PPS12, which allows SPD's only to expand policies in development plan documents. However policies that should be within a DPD	This draft SPD seeks to provide detailed guidance on adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types, both within a site and within each locality. It is also in line with emerging policies relating to housing	No change to the SPD.

		should be subject to scrutiny and statutory procedures and as such should not be set out in other documents (SPD's).	growth and future provision within the Core Strategy 2026. This policy approach is consistent with national and regional policies as set out in this SPD. The preparation of this SPD has been undertaken in accordance with the statement of community involvement.	
Whole doc.	Demarcation CR 00021/7	Objection: The SPD seeks to prescribe the mix of dwellings sizes and types on all residential development sites throughout the city on a neighbourhood basis, which is <u>not legitimate</u> . It goes beyond the terms of Policy HS.8.	Adopted Local Plan Policy HS.8, requires a balanced and suitable distribution of dwelling types, both within a site and within each locality. Therefore the supplementary advice needs to relate to all individual residential sites and relate to its spatial context.	No change to the SPD.
Whole doc.	Demarcation CR 00021/15	Objection: Recent research, "Assessing Urban Housing Capacity" states that the subdivision of existing housing into two or more units has been found to be a significant source for new homes. Residential subdivisions are essential to Oxford making better use of pdl and limited land available.	This draft SPD allows the prospective developer a reasonable measure of flexibility in being able to choose the balance of dwelling units in providing some family housing together with an allowance for smaller units, within a defined range. The SPD does not seek to resist all conversions, larger existing properties (above 110m ²) could be converted to provide flats of differing sizes.	No change to the SPD.
Whole doc.	Thames Valley Police, Property Services CR 1616/1	Support: Well written and well presented comprehensive document.	Noted.	No change to the SPD.
Whole doc.	Thames Valley Police,	Comment: Would wish to be assured that provision	The adopted 'Affordable housing SPD'	No change to the SPD.

	Property Services CR 1616/2	of affordable housing and proposed mix for neighbourhood areas takes account of potential crime and disorder issues and does not create or compound problems in certain areas.	already requires a mix of housing types and sizes. This draft SPD also seeks to ensure that there is a balanced mix of dwellings both on individual sites and within its spatial context.	
Whole doc.	Oxford Civic Society CR 173/1	Support: Strong general support to the thrust of this draft SPD. Endorse general situation described in the Introduction and assessment in the Evidence base.	Noted.	No change to the SPD.
Whole doc.	John Phillips Planning Consultancy CR 171/10	Support: Overall the intention of providing supplementary guidance is welcomed.	Noted.	No change to the SPD.
Whole doc.	John Phillips Planning Consultancy CR 171/11	Objection: Consider the approach taken is flawed, and appears to be based on pre-set goals rather than aiming to achieve a balanced and suitable distribution of dwelling types both within the site and its locality.	This draft SPD seeks to provide detailed guidance to supplement adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types for individual sites and the local area.	No change to the SPD.
Whole doc.	Oxfordshire County Council CR. 00024/1	Support: Generally supports the objectives of the SPD, as they are broadly in line with the Structure Plan policy H3b, which states that new housing development should include a variety of dwelling types and sizes to create balanced communities.	Noted.	No change to the SPD.
Whole doc.	Oxfordshire County Council CR. 00024/8	Objection: The impact on infrastructure, such as education, does not seem to have been fully considered in this document.	Whilst there would be impacts on the infrastructure these would be dealt with on an individual basis through the requirements of the Planning Obligations SPD. In the longer term the Local Development Framework and in	No change to the SPD.

			particular the Core Strategy 2026 will include a strategic policy approach to the provision of infrastructure, including education needs, for the future.	
Whole doc.	T. Pocock 31 Green Road Headington CR 450/6	Objection: As part of the impact of conversions in each locality need to consider the adequacy of services / infrastructure, such as sewerage.	Whilst there would be impacts on the infrastructure these would be dealt on an individual basis through the requirements of the Planning Obligations SPD. In the longer term the Local Development Framework and in particular the Core Strategy 2026 will include a strategic policy approach to the provision of infrastructure, including the adequacy of services / sewerage needs, in the future.	No change to the SPD.
Whole doc.	Oxfordshire County Council CR. 00024/9	Support: The principle of achieving mixed and balanced communities across the city is supported as these help to achieve a good balance of users of different transport modes, help create safe, attractive and populated streets and create sustainable communities where the need to travel is minimised.	Noted.	No change to the SPD.
Whole doc.	T. Pocock 31 Green Road Headington CR 450/1	Support: Strongly believe that limits should be set on the number of conversions of family homes to multiple occupation dwellings, particularly where rented rather than owned.	Noted.	No change to the SPD.
Whole doc.	Goodman International CR 00018/2	Support: In principle support the general aim of the draft SPD, to encourage an appropriate mix of dwellings, including	Noted.	No change to the SPD.

		an increased proportion of family-sized housing, in appropriate locations.		
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/1	Objection: Object to the core of the policy and its assumptions that it will improve planning through 'prescription', concern that the conversion of large numbers of three bed houses to flats promoted by the Council has resulted in the mixed communities now being advocated. This is causing concern to both residents and councillors, these effects need to be considered when adopting this policy.	Recent trends in housing supply in Oxford show that the new housing being developed is mainly small one and two bed flats. The continuation of this trend over a number of years will lead to a mismatch between need and supply, which would not be sustainable. This SPD seeks to provide advice on how to achieve a balanced mix of dwellings both within the city and the local areas. The increase in higher densities has had adverse effects on the character of the suburban areas and the maintenance and enhancement of sustainable communities.	No change to the SPD.
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/1	Objection: The draft SPD makes a large number of assumptions and is adding to the prescriptive nature of the local plan and local planning which works against brownfield redevelopment and housing provision. Change: to review impact on brownfield policy and PPS3.	This draft SPD seeks to provide detailed guidance to supplement adopted Local Plan Policy HS.8, which requires a balanced and suitable distribution of dwelling types for individual sites and the local area. The policy approach proposed is in accordance with the aims and objectives of PPS3, and the guidance is intended to provide clarity for developers and the Local Planning Authority in relation to the mix of dwellings required. The AMR will monitor the impacts of this policy in terms of the overall supply of dwellings coming forward and the types.	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.

Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/10	Objection: The determination of planning applications at Committee does not allow an adequate forum for debate. Change: If more complex policies are introduced a better forum is required for applicants to present their case. Improve Committee procedures.	Agents are encouraged to have pre-application discussions with officers prior to an application being submitted. The advice in the SPD provides the developer with a clear indication of the mix of dwellings considered appropriate for individual sites based on its location and the number of units proposed. The Constitution sets out the procedure for the relevant Committees to consider and determine applications.	No change to the SPD
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/11	Objection: Since the Planning Acts 1947 the quality of architecture and design has declined since more time is spent on ideological needs with no real understanding of character / architecture required to achieve a well designed building. Change: This policy should be seen in the overall context of design solutions if we are to enable development, planning policy seems more concerned with social engineering rather than good design.	This SPD is concerned with the appropriate mix of dwellings having regard to the location of the site and the number of units proposed. The adopted Local Plan provides policies, which require schemes that demonstrate high standards of design, efficient use of land and density, and the importance of designing development, which relates to its context. The determination of a planning application needs to take account of all these considerations.	No change to the SPD
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/15	Objection: As part of any housing provision consideration must also be given to associated infrastructure and facilities, such as schools, recreation, and sports provision. Need also to cater for all groups, sectors of society, and their particular housing needs, ie. young families, retired.	Whilst there would be impacts on the infrastructure these would be dealt on an individual basis through the requirements of the Planning Obligations SPD. In the longer term the Local Development Framework and in particular the Core Strategy 2026 will include a strategic policy approach to	No change to the SPD

		Change: Need to add this concept to policy.	the provision of infrastructure, and services, for the future. In relation to housing provision the SPD seeks to provide a balanced mix of dwellings to meet the needs of a range of different sectors.	
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/16	Objection: Affordable housing provision can be met by providing good quality apartments of two and three bedrooms. However there are conflicts with Local Plan and provision of amenity space. Need to address the contradictions. Change: Review all policies in the light of the past 12 months since Local Plan was adopted.	The adopted SPD on 'affordable housing' provides guidance on the required mix of affordable units. The Local Plan does contain a policy relating to the provision of private amenity space, however this should be considered in the context of the Policy HS.8 and this SPD in requiring an appropriate mix of dwellings on a site. These considerations need to be weighed in the balance and determined on the merits of the case.	No change to the SPD
Whole doc.	Riach Architects 65 Banbury Rd Oxford CR 142/18	Objection: This policy aims to prevent the conversions of three bed houses to flats. However due to the large numbers of conversions taking place this has impacted on local communities. But this policy approach appears to be promoting the notion of mixed communities, which will only compound the very problems it is trying to resolve. Change: review and learn from past mistakes, avoid being over prescriptive and create policies that fully consider all of the issues, not just the current fashionable ones.	Recent trends in housing supply in Oxford show that the new housing being developed is mainly small one and two bed flats. The continuation of this trend over a number of years will lead to a mismatch between need and supply, which would not be sustainable. This SPD seeks to provide advice on how to achieve a balanced mix of dwellings both within the city and the local areas. The increase in higher densities has had adverse effects on the character of the suburban areas and the maintenance and enhancement of sustainable communities.	No change to the SPD

Whole doc.	Jack Straw's Lane Association CR 63/1	Support: We are in favour of encouraging a mix of size of property in new residential developments. Could this also include provision within these 'family homes' for elderly people.	Support noted, elderly parents etc. could live in family accommodation providing it is part of the one unit.	No change to the SPD
Whole doc.	Jack Straw's Lane Association CR 63/2	Comment: In favour of encouraging more provision for key workers near to workplace.	Comments noted but outside the scope of this SPD.	No change to the SPD
SECTION 1: INTRODUCTION				
Para 1	D. Beasley Architect CR 00016/1	Objection: Amend text in third sentence from "will" to "may" lead to a mismatch.	Based on the evidence set out in the background paper, on recent housing supply trends it is clear that the continuation of these trends will lead to a mismatch between need and supply.	No change to the SPD
Paras 1-3	Old Marston Parish Council CR 8/1	Comment: Government guidance is aimed at creating more residences, with the smallest effort and little regard for quality of life of families.	Government guidance in PPG3 highlighted the increase in smaller households and higher densities. However the recently published PPS3 seeks to promote mixed and inclusive communities, which offer a choice of housing styles and types.	No change to the SPD
Para. 2	Jack Straw's Lane Association CR 63/ 2	Comment: The high percentage (95%) of 1 & 2 bed properties being built in Oxford is adversely effecting the housing stock supply. Families are therefore being forced to move to alternative locations outside of the City.	Comments noted.	No change to the SPD
Para 2, 3, 42	Oxford Civic Society CR 173/5	Comment: Since the adoption of the Local Plan there has been a large number of	Comments noted.	No change to the SPD

		planning applications for the conversion of family houses, often 3 bed properties, into smaller units. This has lead to the loss of amenity/garden space and increased demand for parking on-street.		
Para 3	D. Beasley Architect CR 00016/2	Objection: No reason to prove the trend is not sustainable.	The concern is that if the identified trend continues it would not be a sustainable position.	No change to the SPD
Para. 3	Jack Straws Lane Association CR 63/9	Comment: Developers are acutely aware of what is flavour of the month, in terms of which properties will obtain planning permission, and what will be acceptable to the planning authorities, and base their applications accordingly. These short term decisions do not necessarily Represent what is good for the long-term health of the community. Lack of family housing within the ring road of Oxford.	Comments noted, and sought to be addressed through this SPD.	No change to the SPD
Paras. 3,22-57	Riach Architects 65 Banbury Rd Oxford CR 142/17	Objection: Current trend in constructing two and one bed apartments is not sustainable. Where is the evidence to substantiate this assumption ? and why is the present approach unsustainable ? why should family accommodation take precedence over other forms of need which is not reflected in demographic and housing need. Also on individual sites should there be a mix of family, and single persons accommodation, such as the elderly. Amend: review policy assumption.	The evidence is set out in the detailed analysis of housing supply trends and demographic information in the Background Paper. The concern is that if the identified trend continues it would not be a sustainable position, since it would not provide a mix of dwellings required to meet future housing need. The proposed policy approach therefore seeks to ensure an appropriate mix of dwelling sizes is provided to meet the forecast demographic and household projections. The adopted Local Plan	No change to the SPD

			requires a mix, this SPD serves to provide some advice on the type of mix within particular ranges.	
Para. 4	T. Pocock 31 Green Road Headington CR 450/4	Comment: Concerned about the impact of Government Policy (PPG3) on promoting more housing development on brownfield sites. This increase in density has adversely effected established residential areas.	The importance of building on 'brownfield land' is encouraged by Government policy and is reflected in the policy approach in the adopted Local Plan. This seeks to limit development on greenfield sites by encouraging the development of brownfield sites, through the efficient use of existing land supply. The consequent increase in density has had an impact on the amenity / character of certain areas, particularly the residential suburbs.	No change to the SPD
Para. 4	Oxfordshire County Council CR 00024/11	Objection: Incorrectly states that "the Local Plan is part of the Local Development Framework."	The Local Plan and its 'saved policies' are part of the Local Development Framework until such time as they are replaced by the emerging policies.	No change to the SPD
Paras. 4,16,58	John Phillips Planning Consultancy CR 171/1	Objection: The adopted Local Plan policy aims to provide a balanced distribution of dwelling types within a site and locality. The SPD seeks to achieve an ulterior purpose to prevent the loss of family dwellings and the introduction of smaller units. The justification is to achieve social inclusion and cohesion, whereas the SPD approach will achieve the opposite.	The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix. Recent trends in housing supply have shown that not only are there few 'family dwellings' coming forward but also the existing stock was being reduced by the number of conversions taking place. Therefore the policy approach does need to relate to both aspects as part of all new	No change to the SPD

			residential developments.	
Para. 7	Jack Straw's Lane Association CR 63/3	Support: Support the principles of social inclusion, social mobility and supporting those most in need.	Comments noted.	No change to the SPD
Para. 7	Jack Straw's Lane Association CR 63/6	Comment: If the social mix gave rise to conflicts of interests impacting on the environment, how would these be dealt with by the Council ?	The SPD aims to provide choice in terms of the mix of housing available. It recognises that to provide for different households a range of accommodation both in relation to size and location needs to be provided.	No change to the SPD
Paras. 7,8,9, 10,42	T. Pocock 31 Green Rd Headington CR 450/3	Comment: Concerned about adverse impacts of conversions from short-term tenants. Associated problems include rubbish not properly managed, on street and off-street parking pressures made worse. Quality of life for residents adversely effected.	These comments and their impacts on the suburban character of residential areas are noted.	No change to the SPD
Paras. 7,8,9	Riach Architects 65 Banbury Rd Oxford CR 142/14	Objection: The model of mixed-communities can present many problems, how are these dealt with in the policy. For example family housing next to apartments can result in social issues of noise, lifestyles etc. Any mix should be all inclusive. Change: the range of definitions needs to be examined.	The SPD aims to provide choice in terms of the mix of housing available. It recognises that to provide for different households a range of accommodation both in relation to size and location needs to be provided. Government advice (PPS3) aims to encourage balanced sustainable communities.	No change to the SPD
Paras 7-14	Jack Straw's Lane Association CR 63/4	Objection: The City Council's aims to achieve a better social mix in new developments needs clarification.	This SPD is designed to provide this detailed advice on how to achieve a balanced mix of dwellings in new residential developments.	No change to the SPD
Paras 7-14	Home Builders	Objection:		

	Federation CR 139/7	PPS3 (para 22, 23) makes it clear that Local Authorities should only seek to influence the size and type of <u>affordable</u> housing based on strategic housing market assessments and other evidence. Proposals for market housing should reflect demand and profile of households requiring market housing. Therefore demand, as well as profile, should influence development, but local authorities should not seek to determine the mix and type and market housing.	PPS3 confirms that Local Planning Authorities should plan for the full range of market housing. The Background Paper considers in detail current and future population / household trends and profiles to gain an understanding of housing need. The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix.	Addition to text to include reference to the appropriate mix on a site having regard to the Affordable Housing SPD. (Para.62A)
Paras 7-14	Demarcation CR 00021/1	Objection: PPS 3 (para.22) requires the issue of mix to be based upon the findings of the Strategic Housing Market Assessment and other local evidence. Local Authorities should set out in LDD's the proportions of households that require market housing; profile of housing types; and affordable housing.	PPS3 confirms that Local Planning Authorities should plan for the full range of market housing. The Background Paper considers in detail current and future population / household trends and profiles to gain an understanding of housing need. The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix.	No change to the SPD.
Paras 7-14	Demarcation CR 00021/2	Objection: PPS 3 only requires developers to bring forward proposals for market housing which reflect demand and profile of households requiring market housing, in order to sustain mixed communities.	PPS3 confirms that Local Planning Authorities should plan for the full range of market housing. The Background Paper considers in detail current and future population / household trends and profiles to gain an understanding of housing need.	No change to the SPD.
Paras 7-14	Demarcation CR 00021/3	Objection: The role of the developer is to submit appropriate proposals on a site by site	PPS3 confirms that Local Planning Authorities should plan for the full range	No change to the SPD

		basis, on the merits of each individual site to meet the requirements of HMA. This document should be amended accordingly.	of market housing. The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix.	
Paras 7-14	Demarcation CR 00021/4	Objection: No account is taken of the host of variables that determine the preferred choice of housing mix on specific sites (set out in Para 46 of PPS3).	The SPD seeks to provide further advice on adopted Local Plan policy HS.8 which requires a mix of dwellings to be provided.	No change to the SPD
Paras 7-14	Demarcation CR 00021/8	Objection: This policy may have the effect of unduly restricting the ability of developers to incorporate additional rooms as studies, rather than bedrooms. It may therefore have implications on the design and accommodation that large and small units can offer.	The SPD seeks only to provide more detailed advice on adopted Local Plan policy HS.8 which requires a mix of dwellings to be provided. The detailed internal layout of individual schemes will be dealt with on the particular merits of the proposal.	No change to the SPD
Paras 7-14	Kingerlee CR 97/1	Objection: There is no basis at any level to prescribe the mix of dwellings for private market housing. Despite references to PPS3 in relation to a suitable mix for a site, the level of prescription as proposed can only apply to affordable housing provision. There is no policy justification for this SPD, which fundamentally and inappropriately seeks to control the private housing market, it should be <u>withdrawn</u> .	PPS3 confirms that Local Planning Authorities should plan for the full range of market housing. The Background Paper considers in detail current and future population / household trends and profiles to gain an understanding of housing need. The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix.	No change to the SPD
Para 4, 16, 17	Home Builders Federation	Objection: The supporting text to Policy HS.8, sets	The adopted Local Plan policy HS.8	No change to the SPD

	CR 139/2	out in para. 7.4.1 that the council will produce SPD and development guidelines “to highlight sites, sizes of sites and localities where Policy HS.8 is likely to be critical “, but this SPD goes way beyond Policy HS.8 and its supporting text. It establishes very specific and prescriptive mix requirements for all new developments in different parts of the city.	requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix. The proposed mix is determined according to the number of units and spatial location. It does include a reasonable measure of flexibility for the developer to choose the balance of units for both family housing and smaller units, within a defined range.	
Para 7	Old Marston Parish Council CR 8/3	Comment: Transient persons generally occupy flats and properties in multiple occupation, as such they have little involvement in or care for the local community.	These comments are noted, and their impacts are recognised in the Neighbourhood areas and through the ‘traffic light model approach.’	No change to the SPD
Para. 8-14	Oxfordshire County Council CR 00024/3	Support: The SPD is in line with PPS3 regarding the need for different households, including the elderly, and recognises the projected growth in older people.	Support noted.	No change to the SPD
Para. 8	D. Beasley Architect CR 00016/3	Objection: Contrived range of housing is not “essential”.	This SPD provides a reasonable measure of flexibility for the developer to choose the balance of units for both family housing and smaller units, within a defined range.	No change to the SPD
Para. 10	Demarcation CR 00021/10	Objection: The increase in the number of smaller units being created has resulted from national and regional policy guidance, seeking higher densities; efficient use of brownfield land; particularly in sustainable locations.	The SPD recognises that this trend started as a result of the increase in smaller households and the encouragement in national guidance (PPG3) of higher densities.	No change to the SPD

Para. 13	D. Beasley Architect CR 00016/4	Objection: “demand” may contradict “mixed communities”.	The market led demand is producing only small one and two bed units over recent years, which does not provide a balanced mix of dwellings to support sustainable communities.	No change to the SPD
Para. 15	D. Beasley Architect CR 00016/4	Objection: Housing provision should meet the “needs of the community”. Oxford is one of the most expensive areas in the country to buy or rent a house. Therefore more affordable property should be encouraged, one and two bed units as opposed to larger more expensive three and four bed units.	The guidance in this SPD seeks to promote mixed and inclusive communities by encouraging a choice of housing types and sizes.	No change to the SPD
Para. 15	Kingerlee CR 97/2	Objection: The Panel Report into the South East Plan and earlier research commissioned by SEERA on household size and type at the regional level found that it was unnecessary and inappropriate for authorities to prescribe the nature of private sector developments.	The Background Paper assessed the findings of the DTZ research study. This highlighted in particular the recent trends towards the development of more flats as opposed to houses. The approach taken in the SPD therefore not to differentiate between flats and houses in new residential development. The advice on the mix of dwellings relates only to the size of units required.	No change to the SPD
Para 17	Home Builders Federation CR 139/3	Objection: The requirements of the SPD does more than have regard to the existing mix and seeks, in effect, to secure the provision of more 3-bed units of accommodation at the expense of 1,2 & 4 bed units.	The City wide profile for Oxford seeks to influence the supply of dwellings coming forward to respond to future need, rather than on the basis of current trends. The overall provision does include a reasonable measure of flexibility for the developer to choose the balance of units for both family	No change to the SPD

			housing and smaller units, within a defined range.	
Para 16-17	Headington Hill Residents Association CR 86/ 2	Comment: Reference made to Policy HS.8 but no cross-reference with other relevant policies, such as Policy CP.6, which seeks to achieve a minimum density requirement. Since the density needs could have a significant influence on the form of the development and amenity space.	This SPD seeks to achieve a balanced mix of dwellings on new residential sites, in accordance with adopted Local Plan policy HS.8. In determining planning applications other relevant policies such as CP.6 will be taken into account and a balanced view taken on the particular merits of the individual case.	No change to the SPD
Para 16-17	Headington Hill Residents Association CR 86/ 3	Comment: Consider that Policy CP.6 should not rely on dwellings per hectare as a measure of density but bedspaces per hectare, which takes account of dwelling size.	Comment noted but this SPD can only expand on an existing Local Plan policy, in this case Policy HS.8.	No change to the SPD
Para 18-21	Old Marston Parish Council CR 8/6	Comment: The pressures on Oxford include the Green Belt and Brookes University, which limit land available and demand from other uses, such as student accommodation for sites.	Comments noted.	No change to the SPD
Para 18	Old Marston Parish Council CR 8/7	Objection: 'Affordable housing' is a misleading term, it should refer to "affordability" of housing. This should be reflected both in house prices and rents.	This paragraph does recognise that the pressures on Oxford's housing market include those associated with 'affordability' and supply of 'affordable housing'.	No change to the SPD

Para 18	Old Marston Parish Council CR 8/8	Objection: Consider developers ought to be required to sell housing at market price, to housing associations who let at market rents to fund acquisition of a proportion of the development.	These comments go beyond the scope of this SPD.	No change to the SPD
Para 21	West Waddy ADP CR 56/7	Objection: Existing and proposed Residents Parking Zones are not evidence of on street parking pressures.	Controlled Parking Zones (CPZ's) have been introduced or proposed to reduce parking pressure for residents.	Amendment to original text to include reference to Controlled Parking Zones and explanatory text (Para. 21).
SECTION 2: EVIDENCE BASE AND PROPOSED APPROACH				
Paras. 22-36	John Phillips Planning Consultancy CR 171/2	Objection: The pseudo technical basis to support this policy appears to have a pre-determined result. For example the demographic trends, such as older age groups and falling household sizes are not reflected in the policy approach. The SPD takes nor or insufficient account of this. Indeed the analysis shows a high proportion of 3 & 4 bed homes as part of the housing stock.	The background paper provides the evidence base, which included an assessment of both population and household forecasts. These have been used to inform the policy approach for this SPD. The SPD therefore aims to provide a range of housing sizes and types together with the spatial dimension, which recognises the smaller household sizes. In relation to the growth of older people as a future demand requirement, to a degree their needs can be met by encouraging new developments to be designed to 'life standards'. There will however have to be further provision made through the Site Allocations DPD to ensure the specific purpose built residential accommodation is available to meet the range of elderly persons future needs	No change to the SPD

			ie. sheltered, residential care homes etc.	
Paras. 22-57	Demarcation CR 00021/9	Objection: This SPD appears to be based on the perception that there has been an erosion of family housing in Oxford, over recent years. It is therefore considered that an imbalance in the housing mix has occurred, which fails to take account of the predominance of 3 bed homes within the existing housing stock.	The Background Paper provides the evidence base, which highlights the recent trends in housing supply. This shows the new housing being developed is mainly small one and two bed flats. Not only is there very little 'family housing' coming forward but increasingly the existing stock is also being converted to smaller units.	No change to the SPD
Paras 22-57	GOSE CR 2/4	Objection: No evidence to show how the deliverability and viability of this SPD has been tested to ensure implementation achieves objective, and does not effect the efficient delivery of the housing allocation.	Viability testing has already been undertaken to ensure that this policy approach continues to deliver the amount of dwellings required. Furthermore the impact of this SPD will be regularly monitored on an annual basis through the AMR.	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.
Paras 22-57	Oxfordshire County Council CR 00024/6	Comment: Social Services background evidence for their strategic direction for older people explains: "According to the most recent population data, Oxfordshire's population of people aged 75+ will increase from 45,700 in 2006 to 48,500 in 2010, an increase of 2,800 people or 6%. Longer term predictions for 2028 show that 77,300 people aged 75+ will live in Oxfordshire. This is an increase of 31,600 or 69% on 2006 levels." Also by 2010 there will be a 14% increase in the 85+ pop. cohort. By 2028 61% and	These additional population forecasts for the County as a whole confirm the overall trend identified in the Background Paper, with regard to the increase in the numbers of elderly people in the future.	No change to the SPD

		90% increases will be seen in the 75-84 and the 85+ pop.cohorts respectively.		
Paras 22-57	Riach Architects 65 Banbury Rd Oxford CR 142/3	Objection: There would seem to be a shortfall of family housing but this is not supported by the statistics or the reality of the situation. Change: Review all demographic trends and assumptions prior to proceeding with this policy.	The Background Paper provides detailed supporting evidence which shows that the recent trends confirm that little 'family housing' is being built and that the existing stock of this accommodated is being converted into smaller units.	No change to the SPD
Para. 25, 54	Oxfordshire County Council CR 00024/12	Objection: There appears to be an inconsistency between the figures in Paras. 25 and 54 for the proportion of 3 bed dwellings. It might be useful in Para 54 to explain that the figures refer to the proportion of the total housing stock, to avoid confusion with Table 3.	Paragraph 25 refers to the market stock of 3 bed dwellings only whilst the second sentence in paragraph 54 refers to the total supply, including social rented, which averages out to 45%.	No change to the SPD.
Paras. 26-31	John Phillips Planning Consultancy CR 171/3	Objection: The analysis alleges to show more permissions being granted for smaller units, which is appropriate given the nature of the demand arising from the household and age trends together with the proportion of 3 & 4 bed properties. The figures do not show the number of these units which would be lost, overall balance which currently exist with completion of all outstanding permission; and impact of analysis.	Section 7 of the Background Paper provides a detailed analysis of the trends in housing supply. This includes an analysis of permissions and completions over the five years 2001-2006. It then goes on to analyse further the permissions alone, since whilst a proportion may never proceed, coverage in terms of the number of dwellings is significantly greater, and represents a more up to date account of trends in housing provision. The two databases however do have similar profiles.	No change to the SPD.
Paras 22-57	Kidlington Parish Council	Comment: Consider that the methodology is	This SPD is supported by a detailed	No change to the SPD

	CR 53/ 7	unsound and presents a somewhat static view of population movement. Takes a snapshot and then projects it forward. This means that it could become outdated and would not take account of new changes, such as Grenoble Road extension.	evidence base which has reviewed the current dwelling stock; identified trends in housing supply; analysed current and future population and household forecasts; estimated future housing requirements; and highlighted how future housing supply should change to meet future demographic needs. The impact of this SPD will be monitored on an annual basis to assess its progress and effect on housing delivery. It is also likely that it would be formally reviewed at the end of a five year period.	
Paras 26-31, 44	T. Pocock 31 Green Road Headington CR 450/2	Comment: Forest Road has suffered from an enormous amount of development over the past five years or so. Examples of redevelopment include 1Forest Rd, and 29 Green Rd. Further proposed conversion at 31 Forest Rd.	Comments noted, confirms concern over the loss of 'family dwellings.'	No change to the SPD
Paras 27-28	Old Marston Parish Council CR 8/2	Comment: Over the years the Parish has lost some 15 family homes converted into flats, plus a number of properties now used as multiple occupation.	Comments noted, confirms concern over the loss of 'family dwellings.'	No change to the SPD
Paras. 31,37,42,54,77	Friends of Quarry CR 1506/1	Support: The Friends of Quarry believe that the balance of new housing in the Quarry Conservation Area no longer meets the community's needs. Over the last 8 years there have been 5 significant developments proposed for the Conservation Area, which amounts to a total of 53 one and two bed flats and 4 family homes.	Comments noted, confirms the recent trend in housing supply, which show new development to be mainly one and two bed units.	No change to the SPD

Paras. 31, 54	Old Marston Parish Council CR 8/4	Comment: The overall emphasis has to change to build 2 and 3 bedroom houses with some garden area, parking and access to jobs.	These comments appear to support the policy approach of this SPD.	No change to the SPD
Para. 32-36	Kingerlee CR 97/3	Objection: The 'evidence' base identified demographic trends, which point to a clear shift towards the middle to older groups yet in respect of household growth there is a notable increase in one person households over the next 20 years. The SPD however seeks to secure a disproportionate increase in family type accommodation (mainly 3 bed dwellings) it is arguable that this is meeting the increase in one person households.	The background paper provides the evidence base, which included an assessment of both population and household forecasts. These have been used to inform the policy approach for this SPD. The SPD therefore aims to provide a range of housing sizes and types together with the spatial dimension, which recognises the smaller household sizes. In relation to the growth of older people as a future demand requirement, to a degree their needs can be met by encouraging new developments to be designed to 'life standards'. There will however have to be further provision made through the Site Allocations DPD to ensure the specific purpose built residential accommodation is available to meet the range of elderly persons future needs ie. sheltered, residential care homes	No change to the SPD
Para. 36	Oxfordshire County Council CR 00024/13	Objection: To reflect the most recent County population and household projections, this paragraph should be amended to read: "The County Council's projections go beyond the trend based approach, and include assumptions about future housing provision. These show a 10%	Accept these proposed changes to the text, which add more details and clarity to the original version.	Amendment to text: amended to provide further explanatory text on the population and household projects to 2016. (Para.36)

		growth in population from 2001 to 2016 and the growth of some 500 households per year from 2006 to 2016.”		
Para. 37	Demarcation CR 00021/5	Objection: Certain sites are more suitable for family housing ie. close to local schools. Conversely others such as Canalside are more suited for apartments given nature of site, and viability.	The policy approach taken in this SPD recognises the spatial dimension by providing a different mix for City, District centres, large strategic sites and Neighbourhood Areas. The proposed mix is therefore sensitive to its location and the size of the development. In addition there is a reasonable measure of flexibility for the developer to choose the balance of dwelling units, and the proportion of family housing and smaller units within a defined range.	No change to the SPD
Para. 38-43	John Phillips Planning Consultancy CR 173/4	Objection: Definition of ‘Neighbourhood areas’ is unclear, as to what makes it a sustainable community. An urban green space analysis has little relevance to housing policy.	The definition of ‘urban villages’ used as a basis for the Green Space study was considered to reflect how local communities functioned. These also provided a geographical basis for defining sustainable communities. The urban village boundaries were then related to ward boundaries to form the Neighbourhood Areas.	No change to the SPD
Para. 38-43	Oxford Civic Society CR 173/2	Support: The concept of Neighbourhood Areas where the effects of developing imbalance are most acute, and demarcation along ward boundaries seems the only practical approach.	Comments noted.	No change to the SPD
Para. 38-52	Northway	Objection:		

	Tennants & Residents Association CR 80/2	Northway comprises areas of Old Headington, and other parts of Headington it does not highlight some of the key changes to housing stock specific to Northway. This includes houses being bought by speculators resulting in conversions of affordable 3 bed houses into flats or multi-occupation. Some properties have absentee landlords which does not contribute to neighbourhood cohesion	This SPD has sought to highlight the local position at the Neighbourhood Area level, however clearly even in these areas there are changes taking place at the micro level. There is a need to monitor the position within each of these Neighbourhood Areas.	No change to the SPD
Para. 41	Oxfordshire County Council CR 00024/14	Support: Support the use of wards for defining Neighbourhood areas as wards are standard geographical units for which a lot of data is available.	Support noted.	No change to the SPD
Para. 42	Oxford Civic Society CR 173/6	Comment: The loss of family housing has lead to a gradual degradation of the overall housing stock, particularly in the most affected areas. The internal layout of small houses does not allow easy conversion into effective or attractive small units, often resulting in unsympathetic extensions to these properties.	These comments appear to support the identified trend for more family houses being converted to small units / flats.	No change to the SPD
Paras. 42,46	T. Pocock 31 Green Road Headington CR 450/4	Comment: If conversions are allowed to continue unchecked, it will cause more on-street parking problems, together with litter/rubbish resulting from a transient population.	These comments confirm the impact of the development of small units and conversions on the character of these Neighbourhood Areas.	No change to the SPD
Paras. 42, 46-47,	Gosford & Water Eaton Parish Council	Comment: The Council is generally concerned where the street character was altered	These comments confirm the impact of the development of small units and	No change to the SPD

		due to the demolition of large houses with big gardens and building flats instead. Also concerned about altering the use of existing garages attached to houses for residential use, where car parking problems would result.	conversions on the character of these Neighbourhood Areas.	
Para. 44	Oxfordshire County Council CR 00024/2	Support: Support in principle the retention of family houses as well as the development of new family housing.	Support noted.	No change to the SPD
Para. 44	Riach Architects 65 Banbury Road Oxford CR 142/12	Objection: Consider assessments in Neighbourhood Areas are narrow and quick to reach a conclusion. For example would question the findings for St. Margarets' area, where it is understood there are already a high proportion of 'family dwellings' anyway. Change: Investigate and review policy.	The 'traffic light model' approach seeks to identify the underlying pressures within a Neighbourhood Area, and assess the effects that continued conversions and more small units would have on the mix of housing. The key indicators used are considered to be appropriate and do provide a broad assessment of each area. In relation to St. Margaret's area the research already undertaken shows that the stock of larger family dwellings, comprising 3 or more beds is significantly lower than all the other areas apart from the City centre.	No change to the SPD
Paras. 44-52	Kidlington Parish Council CR 53/ 4	Comment: Supports the use of the traffic light system.	Support noted.	No change to the SPD
Paras 44-52	Kidlington Parish Council CR 53/ 5	Comment: Question the criteria used, such as the parking and townscape assessments.	The 'traffic light model' approach seeks to identify the underlying pressures within a Neighbourhood Area, and assess the effects that continued conversions and more small units would	No change to the SPD

			have on the mix of housing. The key indicators used, including both parking and townscape assessments are considered to be appropriate and relevant and together with other key indicators used do provide a broad assessment of each area.	
Paras. 44-52	Oxford Civic Society CR 173/3	Support: The traffic light model approach, which is simple to interpret and apply.	Support noted.	No change to the SPD.
Paras. 44-52	Oxford Civic Society CR 173/4	Objection: Consider that principles of control should be applied at a finer grain within each neighbourhood. For example Headington, which already has pockets of sub-divisions of family houses, together with high levels of HMO's (unofficial as well as registered), this should move them into 'red' rather than 'amber' areas. Change: Suggest additional text to explain and permit sub-neighbourhood approach.	The Neighbourhood Area network provides the local framework for the assessment of the key indicators and being ward based allows the opportunity for a range of statistics to be gathered in the future. To break down the assessment to a smaller level for the purposes of this SPD would in the officers view be too detailed.	No change to the SPD.
Paras 44-52	Highfield Road Residents Association CR 172/4	Objection: Within any one neighbourhood there is likely to be a range of communities with individual characteristics and therefore difficult to set rigid guidelines. For example Gipsy Lane/Valentia Road estate, has a high rate of extensions, conversions and unregistered HMO's creating an unbalanced community, with a high proportion of single/student let. Consider the SPD needs to recognise and identify specific 'hot-spots', where	The Neighbourhood Area network provides the local framework for the assessment of the key indicators and being ward based allows the opportunity for a range of statistics to be gathered in the future. To break down the assessment to a smaller level, such as sub-areas or street level would in the officers view be too detailed for the purposes of this SPD. Nevertheless it is a point, which could be considered in	No change to the SPD.

		the balance of housing problem is critical.	more detail through the implementation and monitoring of this SPD, and ultimately as part of a future review.	
Paras. 44-52	Dr. Liz Fisher CR 00019/2	Objection: The SPD does not go far enough in giving greater policy substance to HS.8. This is because it ignores the problems created by the large number of properties being rented out for student accommodation for private investment purposes. Problems include: loss of family housing; dominance of one type; over development / overcrowding; poor quality development; parking problems; and noise / nuisance.	This SPD seeks to identify the underlying pressures within a Neighbourhood Area, and assess the effects that continued conversions and more small units will have on achieving a balanced mix of housing. The 'traffic light model' approach has identified some of the key indicators, such as the level of multiple occupation (HMO's). This assessment only takes into account those HMO's known to the City Council. Although it is recognised that the total number is probably significantly more, there is no available data to identify these other properties. The Neighbourhood Area designation does however provide the framework for the position to be regularly monitored.	No change to the SPD.
Paras. 44-52	Dr. Liz Fisher CR 00019/3	Objection: Particular problem of student accommodation and HMO's acknowledged in SPD and Background Paper but neither document appears to properly address this issue.	The 'traffic light model' approach has identified some of the key indicators, such as the level of multiple occupation (HMO's). This assessment only takes into account those HMO's known to the City Council. Although it is recognised that the total number is probably significantly more, there is no available data to identify these other properties. The Neighbourhood Area designation does however provide the framework for the position to be regularly	No change to the SPD.

			monitored.	
Paras. 44-52	Dr. Liz Fisher CR 00019/4	Objection: The East Oxford 'neighbourhood area' contains at least twice as many dwellings in it than 2/3 of other areas. The number of dwellings in East Oxford area does highlight that the problems of over development and balance of dwellings are really acute in East Oxford compared to other areas.	The 'traffic light model' approach has highlighted the underlying pressures in East Oxford, not least the level of properties in multiple occupation and the high rate of recent conversions. East Oxford is therefore identified as a 'red area' where the greatest pressure is experienced. Table 4 reflects the need to secure more 'family housing', and safeguard the existing stock, as compared to other areas of Oxford.	No change to the SPD.
Paras. 44-52	Dr. Liz Fisher CR 00019/5	Objection: The problems of over-development are particularly serious in certain parts of East Oxford area (eg. Golden Triangle) and that an even more stringent approach is required in particular streets.	East Oxford is identified as a 'red area' where the greatest pressure is experienced, and therefore Table 4 reflects the most stringent requirements.	No change to the SPD.
Paras. 44-52	John Phillips Planning Consultancy CR 171/5	Objection: The policy seeks to use a traffic light model to secure the retention of family dwellings. This is not the purpose of the local plan policy, the SPD seeks to introduce one rather than supplement one that exists. The SPD should identify sites, sizes and localities where a balance of dwellings is critical, not set itself against the loss of any particular house type.	The adopted Local Plan policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix. This needs to take account of all new residential developments, which comprise both new build and conversions. The proposed mix is determined according to the number of units and spatial location. It does include a reasonable measure of flexibility for the developer to choose	No change to the SPD.

			the balance of units for both family housing and smaller units, within a defined range.	
Paras. 45, 46	Jack Straws Lane Association CR/ 63	Comment: Applications to convert family houses to flats should take account of the impact on the amenity of neighbouring residents.	Comments noted.	No change to the SPD.
Para. 46	Oxfordshire County Council CR 00024/10	Objection: Question the validity of using controlled parking zones as indicators of residential parking pressure. Most result from problems associated with commuter parking. Therefore suggest that the presence or otherwise of a Controlled Parking Zone (CPZ) should not be used as an indicator.	Controlled Parking Zones (CPZ's) have been introduced or proposed to reduce parking pressure for residents. In recognition of these pressures, new development within CPZ areas is often excluded from having the right to residents' and visitors permits. However this can in itself lead to pressure for more off-street parking provision.	Amendment to original text to include reference to Controlled Parking Zones and explanatory text (Para. 21).
Para. 53	Oxfordshire County Council CR 00024/15	Objection: The housing figures identified in the Preferred Options are higher than recommended by the Panel Report. Projected trends should be based on a figure of 8,000 dwellings rather than 11,000. SPD should also only relate to the City's boundaries, should the Strategic Development Area recommended by the Panel go ahead, the appropriate mix should be determined jointly with City and South Oxfordshire through an Area Action Plan. This paragraph should be amended accordingly.	The broad figures referred to in this SPD represented a strategic assumption, used by the consultants in their background study. This was based on the Preferred options figure that some 11,000 net additional dwellings will be built over the next 20 years, which amounts to 550 per year. The figure of 11,000 dwellings is however subject to change, depending on the outcome of the South East Plan process, and further technical work being undertaken on housing capacity. The policy approach within this SPD can only relate to areas within the City's boundaries. The proposed mix for any	Amendment to text to delete reference to overall figures, but including figures for the current rate of housing development in Oxford. (Para.53)

			possible 'urban extension' would be determined through joint discussion with the City and South Oxford.	
Paras 53-57	Kier Property & Worcester College CR 126/8	Objection: Supply profile may have over-estimated the need for more family housing. City wide requirement 'central and paramount'.	The city wide profile set out in Table 2 as the 'provision required', represents the supply target. The broad figures referred to in this SPD represented a strategic assumption, used by the consultants in their background study. This was based on the Preferred options figure that some 11,000 net additional dwellings will be built over the next 20 years, which amounts to 550 per year. The figure of 11,000 dwellings is however subject to change, depending on the outcome of the South East Plan process, and further technical work being undertaken on housing capacity.	No change to the SPD
Para. 53-57	John Phillips Planning Consultancy CR 171/6	Objection: There is inadequate evidence to suggest that the changing composition of house types (Table 3) would cause demonstrable harm and the projected provision required does not appear to reflect changing household sizes or population, rather it is aimed to secure a particular result.	The Background Paper sets out the evidence in some detail. It assesses the stock of housing in Oxford, analyses the trends in housing supply, considers future population and household forecasts, future housing requirements, and then estimates how the supply would have to change to ensure that it reflected future housing need.	No change to the SPD.
Para. 54	Kingerlee CR 97	Objection: The 'evidence' suggesting that the proportion of 3 bed dwellings would fall from 45% to 41% hardly justifies such a prescriptive policy to determine all	Table 3 in the SPD clearly shows that if current trends continue the proportion of 3 bed dwellings will fall to 21.8%, whilst 2 bed dwellings will rise to 42.2%, which	No change to the SPD.

		applications. If there is any justification for the approach advocated then (and here it might be more closely aligned with PPS3 requirements) it should apply to residential developments of 25 units and above but only then in an 'advisory' not prescriptive way.	would then become the dominant dwelling type. In relation to 3 bed dwellings this shows the greatest mismatch, with the future profile requiring more than twice as many 3 bed units.	
Para 55	Rectory Homes CR 00017/4	Objection: Table 3 of the draft SPD is not supported by any background evidence. Indeed the background paper considers that smaller household sizes and the need for smaller units of accommodation is required.	The Background Paper provides extensive evidence to supply the policy approach framework proposed in this SPD. Chapter 9 in particular draws on all the preceding evidence to highlight the future household requirements. Table 3 in the SPD then compares the projected supply if current trends continue with the provision required. In relation to 3 bed dwellings this shows the greatest mismatch, with the future profile requiring more than twice as many 3 bed units.	No change to this SPD
Paras 55 -57	Rectory Homes CR 00017/2	Objection: If market trends continue by 2026 3 bed dwellings would remain the dominant house type.	Table 3 in the SPD clearly shows that if current trends continue the proportion of 3 bed dwellings will fall to 21.8%, whilst 2 bed dwellings will rise to 42.2%, which would then become the dominant dwelling type.	No change to this SPD
Paras. 58-73	Old Marston Parish Council CR 8/5	Comment: The location of new dwellings should be in close proximity to employment. The edge of Oxford is therefore considered to be the preferred location.	Agree overall with this statement.	No change to this SPD
Paras. 58-80	Jack Straws Lane	Comment: If the intention is to secure affordable	This SPD seeks to influence the overall	No change to this SPD

	Association CR/63/ 5	housing and allocate a percentage to specific sectors of the community how will this work.	mix of dwelling types and sizes on a particular site. The amount of affordable housing units will however be determined by the Affordable Housing SPD.	
Paras. 58-80	John Phillips Planning Consultancy CR 171/7	Objection: Inadequate evidence to support policy guidance. It reflects an arbitrary approach based on inadequate analysis resulting in a pre-formed bias in favour of a particular house type, and against others.	The Background Paper sets out the evidence in some detail. It assesses the stock of housing in Oxford, analyses the trends in housing supply, considers future population and household forecasts, future housing requirements, and then estimates how the supply would have to change to ensure that it reflected future housing need.	No change to the SPD.
Paras. 58-80	John Phillips Planning Consultancy CR 171/8	Objection: Little or no consideration has been given to site circumstances and the need to secure efficiency in the development of previously developed land.	The policy approach taken in this SPD recognises the spatial dimension by providing a different mix for City, District centres, large strategic sites and Neighbourhood Areas. The proposed mix is therefore sensitive to its location and the size of the development. In addition there is a reasonable measure of flexibility for the developer to choose the balance of dwelling units, and the proportion of family housing and smaller units within a defined range.	No change to this SPD.
Para. 58-80	Oxfordshire County Council CR 00024/4	Objection: Consider that the SPD is not flexible enough to allow for development required for the successful implementation of emerging County Council strategies for delivering care to older people (eg. Extra Care Housing	The purpose of the SPD is to provide more detailed guidance on Policy HS.8, which seeks to ensure an appropriate mix of dwellings for new residential developments to ensure a balanced distribution of dwelling types both within	No change to this SPD.

		<p>scheme) and those with special housing needs. Providing ECH suited to the needs of the elderly would help to release family dwellings back into the market.</p>	<p>the site and its locality. In relation to the growth of older people as a future demand requirement, to a degree their needs can be met by encouraging new developments to be designed to 'life standards'. There will however have to be further provision made through the Site Allocations DPD to ensure the specific purpose built residential accommodation is available to meet the range of elderly persons future needs ie. sheltered, residential care homes</p>	
Para. 58-80	Oxfordshire County Council CR 00024/5	<p>Objection: Sufficient flexibility should allow for the provision of one or two bedroom dwellings to provide for specific sectors of the population as an exception to policy, where mixed provision would threaten the viability of a scheme. This flexibility is also required in relation to the provision of housing of multiple occupation for those with specific needs.</p>	<p>The purpose of the SPD is to provide more detailed guidance on Policy HS.8, which seeks to ensure an appropriate mix of dwellings for new residential developments to ensure a balanced distribution of dwelling types both within the site and its locality. There will need to be further provision made through the Site Allocations DPD to ensure the specific purpose built residential accommodation is available to meet the range of elderly persons future needs ie. sheltered, residential care homes.</p>	No change in the SPD.
Para. 58-80	Kingerlee CR 97/5	<p>Objection: This guidance relates to smaller schemes ie.4-9 units and even 1-3, and is intended to ensure no net loss of family housing. The policy could require up to 100% of units to be 3 bed</p>	<p>In the case of the 'red' and 'amber' areas, for developments of 1-3 units, these should ensure that there is 'no net loss of 'family units'. The policy guidance allows the</p>	Amendment to glossary to provide further details on the definition of a 'family unit.'

		<p>properties. This insistence on the provision of 3 bed dwellings could produce lower densities and less units for any given site. It could also reduce the amount of affordable housing coming forward and exacerbate problems of affordability, which are a characteristic of Oxford's housing market.</p>	<p>prospective developer a reasonable measure of flexibility in being able to choose the balance of dwelling units, and the proportion of family housing required together with an allowance for smaller units, within a defined range. Whilst there is an acceptance that a higher proportion of smaller units would be appropriate within the City and District centres. The promotion of more 'family units' in suburban Neighbourhood Areas would in principle appear to be more appropriate. The number and type of affordable units would be determined by the affordable housing SPD, this may be less overall if the total number of units is less.</p>	
Paras. 58-80	<p>Riach Architects 65 Banbury Road Oxford CR 142/4</p>	<p>Objection: This policy approach would be entirely feasible on greenfield sites, but Oxford's land supply is largely brownfield, garden sites or redevelopment of commercial / industrial land. The requirements of these sites require compromise to achieve an appropriate design solution. Change: apply policy to Greenfield sites of more than 20 dwellings as small sites have to be treated as one off and cannot be developed through over prescriptive policies.</p>	<p>This SPD seeks to provide guidance and advice on the mix of dwellings required on new residential developments and conversions. The policy guidance allows the prospective developer a reasonable measure of flexibility in being able to choose the balance of dwelling units, and the proportion of family housing required together with an allowance for smaller units, within a defined range. This guidance on the mix required for any particular site then needs to consider other relevant Local Plan policies, such as density and efficient use of land.</p>	No change to the SPD.
Paras. 58-80	<p>Riach Architects</p>	<p>Objection: For any development to progress</p>	<p>Background work has already been</p>	No change to the SPD.

	65 Banbury Road Oxford CR 142/5	through feasibility it must be viable. The viability relies on the cost of the development plus profit margin from sales. We feel to add another layer of complexity will confuse everyone. Change: introduce viability and thresholds to identify and resolve how practical implementation of a plan can be achieved if at all on smaller brownfield sites.	undertaken on the viability of particular schemes, mainly the smaller sites. To introduce a methodology on viability and other thresholds would make the SPD guidance more complex. However as part of the monitoring and implementation stage, schemes that remain unimplemented where viability is considered to be an issue will be assessed as case studies.	
Paras. 58-80	Riach Architects 65 Banbury Road Oxford CR 142/6	Objection: This SPD with its policy contradictions and complex ideas, formulas, and traffic light system will confuse both councillors and members of the public. Change: simplify definitions.	The SPD includes an introduction, which provides the setting, then leads on to the evidence base and policy approach. The policy advice guidance has been designed within a spatial context to make it straightforward to operate. For example there are separate tables showing the mix of dwellings for City, District and Neighbourhood Areas.	Amendments to some definitions within the glossary required to provide further clarity.
Paras. 58-80	Riach Architects 65 Banbury Road Oxford CR 142/7	Objection: Planning Officers will have difficulty achieving the 'perfect balance' for a site. Change: Clearer policy guidance required, only schemes of 20 units should be the first benchmark.	The purpose of the SPD is to provide some advice for the mix of dwellings for residential developments. Policy HS.8 in the Local Plan does not include a threshold but applies to residential developments of any size. The policy advice guidance has been designed within a spatial context to make it straightforward to operate. For example there are separate tables showing the mix of dwellings for City, District and Neighbourhood Areas.	No change to the SPD.
Paras. 58-80	Riach	Objection:		

	Architects 65 Banbury Road Oxford CR 142/8	As agents we have had difficulty meeting planning policy in developing brownfield sites over the past two years. Particularly in relation to amenity space provision. More garden area results in less floorspace for new development. Change: This policy works against the provision of family housing, unless common sense prevails and a clear policy emerges which deals with garden size versus balance of dwellings which will impact on housing delivery on brownfield and windfall sites, as the complex inter-linking of policies will work against schemes.	The Local Plan does contain a policy relating to the provision of private amenity space, however this should be considered in the context of Policy HS.8 and this SPD in requiring an appropriate mix of dwellings on a site. These considerations need to be weighed in the balance and determined on the merits of the case.	No change to the SPD.
Paras. 58-80	Riach Architects 65 Banbury Road Oxford CR 142/9	Objection: To overcome issues of garden space, developers are having to turn to the provision of one-bed apartments, since this allows some relaxation in garden size. The development of schemes is now subject to amenity space requirements together with the needs of this SPD making developments unviable. Change: Introduce viability appraisal methodology.	The Local Plan does contain a policy relating to the provision of private amenity space, however this should be considered in the context of Policy HS.8 and this SPD in requiring an appropriate mix of dwellings on a site. These considerations need to be weighed in the balance and determined on the merits of the case. Viability appraisal work was undertaken as part of the background research for the Local Plan, carried out by Fordham Research in 2004. Further viability studies have been done in relation to affordable housing and more recently Planning Obligations.	No change to the SPD.
Paras. 58-80	Riach Architects 65 Banbury	Objection: Do apartments qualify as 'family housing', for example Summertown	To achieve clarity, this definition is to be amended to explain in more detail the	Amendment to glossary providing further details to the

	Road Oxford CR 142/13	House in St. Margaret's includes family apartments. Change: Investigate and review what is meant by 'family housing' apartment living, amenity space provision.	definition of a 'family unit.' It would however include flats or apartments, within the definition for new residential development.	definition of a 'family unit.'
Paras. 61, 79	Gerald Eve on behalf of Christchurch CR 00020/7	Objection: Unclear how this guidance would apply in cases where a developer is bringing forward a number of sites across a Neighbourhood Area. There needs to be sufficient scope for development sites to be considered in the context of other sites coming forward, to ensure a strategic approach to be taken to allowing housing types to be distributed according to the best sites. Proposed amendments: Change: 61A On sites for proposed residential development of 10 or more units, proposals will be expected to provide a unit mix which has regard to the strategic targets set out in the SPD. Where a number of sites are being brought forward, for example as part of the West End regeneration, it may be appropriate to adopt a comprehensive approach with regard to the overall mix of housing sizes across the group of sites, rather than requiring rigid adherence to the housing mix targets on a site by site basis, to allow the flexible distribution of housing types to the most appropriate locations."	The policy guidance is based on an individual site by site assessment, however clearly there is flexibility built in to the mix which allows the dwelling types to be decided within given percentage ranges. Furthermore in the case of the development of new residential sites additional flexibility allows 'family units' to comprise flats or houses. In the case of the West End the mix of dwellings proposed in Policy WE15 complies with the mix for the City centre set out in Table 4 of the SPD.	No change to the SPD.
Para. 64-66	Oxfordshire County Council	Comment: Suggest clarification between the West	The City centre boundary is defined in	No change to the SPD.

	CR 00024/16	End and the City centre, which are assumed to be different areas. The mix in Table 4 appears to be different from that in Policy WE15 of the Area Action Plan. Do not object to Table 4 but feel the distinction should be made clear.	the adopted Local Plan and includes the West End area. In the West End the mix of dwellings proposed in Policy WE15 complies with the mix for the City centre set out in Table 4 of the SPD.	
Paras. 64-66	Gerald Eve on behalf of Christchurch CR 00020/2	Objection: Concerned that there is overlap between this SPD and West End Area Action Plan. The SPD sets out targets for the whole city centre whilst the WEAAP has targets for the West End Area only.	In the West End the mix of dwellings proposed in Policy WE15 complies with the mix for the City centre set out in Table 4 of the SPD.	No change to the SPD.
Paras. 64	Gerald Eve on behalf of Christchurch CR 00020/3	Objection: Proposed amendment to paragraph to ensure that the mix within the West End area will be determined by the WEAAP. “ 64. The strategic mix for the City centre reflects the emerging policy approach for the West End Area Action Plan. Development sites within the West End should adopt the approach to housing mix set out in the AAP. Should there be any conflict later in the plan period between the City centre wide housing mix target and that set down in the AAP the AAP, as a development plan document, will take precedence over supplementary guidance.”	In the event of any conflict between the SPD and the West End DPD, an adopted DPD would have precedence.	No change to the SPD.
Para. 65	Gerald Eve on behalf of Christchurch CR 00020/1	Support: Support the comments made relating to the suitability of high density development and efficient use of land in	Support noted.	No change to the SPD.

		the City centre.		
Para 66	Oxford Consumers Group	Objection: Concerned about the vagueness of the word “significant”, but consider the text should be amended to make its implications clearer. Do not want it to be minimal or a token amount.	The meaning of ‘significant’ is clearly set out by reference to Table 4 which explains that for sites of 10 and above a minimum of 20% of the mix should be 3 bed units, and at least 10% for 4+ bed units.	No change to the SPD.
Para 66	Gerald Eve on behalf of Christchurch CR 00020/4	Objection: Consider the suitability of individual sites to provide a mix of uses should be taken into account, which may allow a different mix or type of unit. Suggested amended wording as follows: “66. Whilst seeking to ensure a balanced mix of dwellings across Oxford, the City centre is considered more suitable for higher density residential developments. The proposed mix therefore promotes a greater proportion of smaller units and usually requires a significant element of family accommodation. However, in view of the particular constraints in the City Centre / West End which mean that some sites will be particularly well or particularly badly suited to a particular unit size the Council will adopt a flexible and pragmatic approach to ensure the unit mix sought is appropriate to the circumstances and characteristics of the site in question.”	The adopted Local Plan policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix. The proposed mix is determined according to the number of units and spatial location. It does include a reasonable measure of flexibility for the developer to choose the balance of units for both family housing and smaller units, within a defined range to reflect site circumstances. The supporting text in Paras. 64-66 fully explains the mix proposed for the City centre.	No change to the SPD.
Para. 66	Gerald Eve on behalf of	Objection: It is unclear whether the housing mix	The policy guidance is based on an	No change to the SPD.

	Christchurch CR 00020/5	targets in Table 4 apply to individual developments across the City centre, or whether it is a strategic goal. If it is the latter concerned that this could produce uncertainty for developers. This approach could result in a quota, whereby sites coming forward towards the end of the Action Plan period would then be required to provide a higher proportion of another type of dwelling, making a scheme unviable.	individual site by site assessment, however clearly there is flexibility built in to the mix which allows the dwelling types to be decided within given percentage ranges. This reflects the spatial location of the site in the City centre, District centre or Neighbourhood Area.	
Para. 66	Gerald Eve on behalf of Christchurch CR 00020/8	Objection: Consider the delivery of a substantial proportion of four bed houses or larger homes in the City may not be viable. Proposed amendment to Table 4 to read: " 3+ bed mix 30% - 43%	The minimum requirement for 4 bed units is only 10%, which according to research undertaken should not unduly restrict the viability of schemes in the City centre. Nevertheless the implementation and monitoring section will assess whether there are any particular difficulties associated with the proposed mix.	No change to the SPD.
Paras 77-80	Kidlington Parish Council CR 53/ 6	Comment: Concerned that there is not sufficient difference between the proportions of dwellings types for the 'red' areas as compared to the 'green' areas.	It is considered that the respective differences between the 'red' and 'green' areas are appropriate and do properly reflect the pressures in each.	No change to the SPD.
SECTION 3: POLICY GUIDANCE				
Para 58-80	Home Builders Federation CR 139/4	Objection: The Policy Guidance would have the knock-on effect of failing to achieve the City Council's housing targets (set by the Panel RSS), and in terms of affordability. The SPD will therefore work against the city's housing	The aim of the SPD is to provide more guidance to implement adopted Local Plan policy HS.8, in seeking to achieve a mix of dwellings on new residential sites. The purpose is to better match housing supply with housing need. The	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.

		problems by both reducing supply and making available supply more expensive.	housing supply and type of accommodation coming forward will be regularly monitored on an annual basis to assess the impact of this SPD.	
Para 58-80	Home Builders Federation CR 139/5	Objection: In addition to increasing housing targets for Oxford the Panel Report recommended against a sub-region affordable housing target and questioned whether the concept of at least 50% was compatible with that of creating mixed sustainable communities. This approach appears contrary to the micro-management proposed by this SPD.	Whilst the Panel Report did question the suitability of higher affordable housing targets for the region as a whole and therefore settled on a target of 35%. It is clear however that the provision of affordable housing should be determined by Local Authorities through their LDD's. The mix of dwellings proposed for the City, District and Neighbourhood areas adds a spatial dimension to the guidance, but the City wide profile sets the overall provision required.	No change to the SPD
Para 58-80	Home Builders Federation CR 139/6	Objection: This policy guidance does not accord with PPS3, South East Panel Report or SEERA who all take the view that it is neither necessary nor sensible for local authorities to seek to prescribe the nature of the product built by the private sector. Decisions about the type of market housing required should be left to developers. (DTZ research supports this approach, accepted by SEERA).	Policy guidance in both PPS1 and PPS3 supports the need to create sustainable communities, which offer a choice of housing styles and types. The SPD seeks to provide advice on how a mix of dwellings, required by adopted Local Plan policy, can be achieved on new residential developments. The policy guidance allows a reasonable measure of flexibility for the developer to choose the balance of dwelling units, and the proportion of family housing together with an allowance for smaller units. The Panel Report (para. 8.32) recommend, in relation to Policy HS6,	No change to the SPD.

			that local authorities should be encouraged “to provide guidelines on housing mix and density (as PPS3), where possible in advance of land being marketed to have the maximum chance of influencing the purchase price and hence the development expectations.”	
Para 58-80	Fairview New Homes Ltd (Fairview) CR 376/1	Objection: These policy guidelines take away the ability of the private sector to respond to market demands at any one time. The Barker Review emphasises the importance of responding to market signals to ensure an efficient use of land, both in plan-making and in development management.	This SPD includes a measure of flexibility for the prospective developer to choose the balance of units, and the proportion of family housing required together with an allowance for smaller units, within a defined range.	No change to the SPD.
Para 58-80	Fairview New Homes Ltd (Fairview) CR 376/2	Objection: These policy guidelines take away the ability of house builders to assess the viability of individual schemes to establish the appropriate mix to ensure a viable scheme. Adverse impact on supply and demand of properties.	Research has already been undertaken to suggest that the viability of sites would not be adversely affected. In addition the implementation of this SPD will be monitored through the AMR. This will assess whether the amount and type of housing being delivered annually is being adversely influenced by the SPD. The policy approach taken has sought to provide considerable flexibility through the percentage range of particular dwelling sizes. Furthermore in the case of new residential developments it does allow for either houses or flats to be provided.	No change to the SPD.
Para 58-80	Fairview New Homes Ltd (Fairview)	Objection: These guidelines erode the ability of the private sector to assess market demand	This SPD includes a measure of flexibility for the prospective developer	No change to the SPD.

	CR 376/3	and respond with innovation and initiative.	to choose the balance of units, and the proportion of family housing required together with an allowance for smaller units, within a defined range.	
Para 58-80	Fairview New Homes Ltd (Fairview) CR 376/4	Objection: If sizes and types of housing are specifically defined in a policy there is limited scope to react or respond quickly to changes in the market.	This SPD includes a measure of flexibility for the prospective developer to choose the balance of units, and the proportion of family housing required together with an allowance for smaller units, within a defined range.	No change to the SPD.
Para 58-80	Demarcation CR 00021/11	Objection: Future household projections consider demand will continue with 70% of new growth being one person households to 2026. Therefore new household types will continue to be for small units.	Whilst this statement is broadly true as a representation of the national trend, this position was fully taken into account by the consultants in the Background Paper. Section 9 Future Household Requirements explains how the 2026 household was transformed into the HRS categories. The dwelling/ household requirements were applied to the resulting structure. This showed how the balance of the City's housing stock at 2006 would need to change to accommodate the households projected to occupy it. The 'provision required' set out in Table 3 of the SPD represents the desired City profile.	No change to the SPD.
Paras. 55-80	T. Pocock 31 Green Road Headington CR 450/5	Objection: Consider the maximum proportion of multiple occupation conversions in a particular street should be limited to 10%. Permissions should include conditions requiring outside areas to be	The Neighbourhood Area network provides the local framework for the assessment of the key indicators and being ward based allows the opportunity for a range of statistics to be	No change to the SPD.

		kept tidy, and limiting car parking.	gathered in the future. To break down the assessment to a smaller level, such as sub-areas or street level would in the officers view be too detailed for the purposes of this SPD. Nevertheless it is a point which could be considered in more detail through the implementation and monitoring of this SPD, and ultimately as part of a future review.	
Para 70	Kier Property & Worcester College CR 126/2	Objection: To the 'blanket' formula set out in Table 6. Should be much greater flexibility in the mix required for strategic sites. The approach should take account of site specific constraints and opportunities (including sites' location, context and accessibility). Site by site analysis required.	The proposed mix in Table 6 varies in percentage terms according to the number of dwellings proposed for the site. In addition there is a reasonable measure of flexibility for the prospective developer in being able to choose the balance of dwelling units, and the proportion of family housing required together with an allowance for smaller units, within a defined range. The spatial context is set in a broad sense by the separate tables for the City, District and Neighbourhood Areas.	No change to the SPD.
Paras 69-70	Kier Property & Worcester College CR 126/3	Objection: Proposed new text: "69 The following table provides a guide to the mix of dwellings that will be sought on other strategic sites, which includes those areas lying outside the City and District centres. 70 The advice on strategic sites within suburban areas has been provided for residential developments of 25 units and above. These have been grouped according to the size of the site with a	The SPD can only provide guidance for sites lying within Oxford City Council's boundaries. If the Government accept the recommendations of the Panel Report this advice will provide a good starting point for future discussions with South Oxford over the proposed mix of dwellings for any future 'urban extension.' The guidance in this SPD will provide	No change to the SPD.

		<p>range of percentages for each dwelling type.</p> <p>Table – amended to reflect SEP Panel recommendation regarding urban extension to the south of Oxford, and the response of Fordham Research to queries raised on assumptions used in study.</p> <p>71 Further assessment of the appropriate mix of dwellings will take place for each strategic site during the preparation of the Site Allocation DPD or relevant Area Action Plan. This assessment should take account of the site's location, context and accessibility.</p>	<p>advice on the future mix for any forthcoming strategic sites. It will then feed into the future Site Allocations DPD or any relevant Area Action Plan DPD.</p>	
Paras 69-70	Kier Property & Worcester College CR 126/7	<p>Objection: No allowance made for the South East Plan and the recommendation for an amendment to the Green Belt for an urban extension to south of Oxford (Grenoble Road). This would provide significant opportunity for more family housing, and therefore greater flexibility on other strategic sites.</p>	<p>The SPD can only provide guidance for sites lying within Oxford City Council's boundaries. If the Government accepts the recommendations of the Panel Report this advice will provide a good starting point for future discussions with South Oxford over the proposed mix of dwellings for any future 'urban extension.'</p>	No change to the SPD.
Paras 69-70	Kier Property & Worcester College CR 126/9	<p>Objection: Appropriate mix of dwellings should be determined by Site Allocations DPD or Area Action Plan.</p>	<p>The guidance in this SPD will provide advice on the future mix for any forthcoming strategic sites. It will then feed into the future Site Allocations DPD or any relevant Area Action Plan DPD.</p>	No change to the SPD.
Paras. 69-70	Goodman's	<p>Objection:</p>		

	International CR 00018/1	Currently promoting a mixed-use employment led development at Peartree site in Oxford. Recognise important relationship between employment growth and the location and mix of housing available. The new generation of Business Parks needs to mix employment with other uses, such as residential to create sustainable communities. The development of Peartree should be able to respond to these needs.	The guidance in this SPD will provide advice on the future mix for any forthcoming strategic sites. It will then feed into the future Site Allocations DPD or any relevant Area Action Plan DPD.	No change to the SPD.
Paras. 69-70	Goodman's International CR 00018/3	Objection: Recommend that the guidance includes a general acknowledgement that not withstanding the identification of areas of family need in the SPD, that the balance of dwellings within local areas will be considered on the merits of individual sites having regard to local viability factors and the site specific characteristics. A blanket formula approach is not sufficiently sophisticated to deal with change over time.	The City profile (Table 3) provides the required mix for Oxford to 2026. The policy guidance section then uses that as a basis to introduce a spatial context, where the mix of dwellings responds to local circumstances. The dwelling mix changes to reflect the location of sites in the City centre, District centres, Strategic sites (outside these areas) and Neighbourhood Areas. Within each table there is a reasonable measure of flexibility for the prospective developer to choose the mix of dwelling units to achieve a proportion of family housing together with an allowance for smaller units, within a defined range.	No change to the SPD.
Para 71-80	West Waddy ADP CR 56/5	Objection: Consider entire section on 'Neighbourhood Areas' should be deleted.	The Neighbourhood Areas provides the local spatial dimension for assessing their underlying pressures through the 'traffic light control' system and provides the opportunity to influence the future	No change to the SPD.

			mix of dwellings, as proposed in the relevant Tables.	
Para. 74	Oxford Civic Society CR 173/ 7	Comment: Larger houses with reasonable sized gardens are generally more suited for sub-divisions.	This policy approach is recognised in the supporting text to this paragraph.	No change to the SPD.
Para. 74	Oxford Civic Society CR 173/ 8	Objection: Two bed ground floor apartments may well be occupied by families and therefore adequate private garden area needs to be provided. The guidance in the SPD should be amended to include this provision. Consider Para. 74, in relation to 3 bed units for family occupation is too vague, suggest following additional text: "This must be private secure space, clearly separated from parking areas."	In relation to new residential developments particularly conversions the supporting text seeks to secure the larger 3 bed family units to be located on the ground floor. It is recognised in the Local Plan that 2 bed units should also have appropriate amenity space provided.	No change to the SPD.
Para. 75	Oxford Civic Society CR 173/ 9	Objection: Suggest that the definition of 'family unit' should be made clear.	The definition of a 'family unit' is proposed to be amended.	Amendment to glossary providing further details on the definition of a 'family unit.'
Para. 74, 75	Demarcation CR. 00021/13	Objection: Clarification is required on the definition of a 'family unit', which does appear to be different from that used in Policy HS.21 of the adopted Local Plan.	The definition of a 'family unit' is proposed to be amended.	Amendment to glossary providing further details on the definition of a 'family unit.'
Para. 74, 75	Demarcation CR. 00021/14	Objection: The policy approach for small windfalls in this SPD appears to be harking back to the previous adopted Local Plan position, which sought to restrict the sub-division of dwellings to flats within prescribed floorspace thresholds. This	The adopted policy HS.8 requires a mix of dwelling types and sizes to be provided. The SPD seeks to add clarity by providing advice to developers on the appropriate mix. Recent trends in housing supply have shown that not	No change to the SPD.

		should not be achieved through an SPD but by the LDF process.	only are there few 'family dwellings' coming forward but also the existing stock was being reduced by the number of conversions taking place. Therefore the policy approach does need to relate to both aspects as part of all new residential developments.	
Para 75	Kidlington Parish Council CR 53/3	Comment: The Council is concerned that the restrictions suggested for small sites would mean that these sites do not come forward. This could lead to greater development pressure in less sustainable sites outside the City.	The additional research undertaken on viability suggests that this will not be the case. However the implementation of this SPD will be monitored through the AMR. This will assess whether the amount and type of housing being delivered annually is being adversely influenced by the SPD. The policy approach taken has sought to provide considerable flexibility through the percentage range of particular dwelling sizes. Furthermore in the case of new residential developments it does allow for either houses or flats to be provided.	No change to the SPD.
Para. 80	Thames Valley Police, Property Services	Support: The proposed mix for Blackbird Leys which supports a larger number of smaller units.	Support noted.	No change to the SPD.
GLOSSARY				
Family unit	Highfield Road Residents Association CR 172/2	Objection: The meaning of the term 'family unit' is not clear, should be defined in the glossary.	To achieve clarity this definitions is to be amended to explain in more detail the definition of a 'family unit.'	Amendment to glossary providing further details on the definition of a 'family unit.'
APPENDIX 1				

APPENDIX 2				
APPENDIX 3				
APPENDIX 4				
Whole doc.	Rectory Homes CR 00017/6	Objection: The matrix lacks credence against the policy basis for its existence, the units required by the red, amber and green areas are neither required nor achievable. Some factors such as landscape/townscape and parking pressure have nothing to do with achieving a balance of housing, how are these relevant ? More of a development control tool. Likely to create diverse neighbourhoods rather than balanced and socially inclusive communities.	The traffic light model is proposed as assessing the underlying pressures within Neighbourhood Areas. The criteria used as key indicators, such as parking, proportion of properties in multiple occupation / student use, landscape character assessment, and recent rate of conversions serve to highlight the scale pressure and the ability of these areas to absorb continued conversions and more small units.	No change to the SPD.
Whole doc.	Highfield Road Residents Association CR 172/3	Objection: Surprised by the matrix score for Headington on 'recent rate of new build of small units' shown as Low. This is at odds with our assessment. Consider score should be 'High', would suggest that data is reviewed and score adjusted accordingly.	Additional research has been undertaken, however in the majority of cases the proposed developments were not fully complete within the monitoring period. This resulted in no significant change to overall proportional scoring position. Nevertheless the future collection of data and analysis of new developments will be used to inform and review each Neighbourhood Area in the context of the 'traffic light' model approach.	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.
Whole doc.	John Phillips	Objection:		

	Planning Consultancy CR 171/9	This matrix seeks to provide a pseudo technical basis for the neighbourhood policy but is arbitrary in analysis and scoring. No indication how scores were derived and factors considered. Too broad an analysis in relation for example to townscape areas, and what is the importance of recent rate of conversions, why have they been included and how are they weighted.	Supporting text explains how the key indicators were identified and the analysis undertaken.	No change to the SPD.
APPENDIX 5				
SUSTAINABILITY APPRAISAL				
Whole doc.	GOSE CR2/3	Comment: Concerned that few alternative options have been examined other than a “do nothing” and “what is proposed.” Are these the only ways to deliver the vision for a balanced community ?	A range of alternative options were originally considered and assessed but these were rejected at an early stage. In practise the “what is proposed” option does include elements from each of these early options in the one proposed approach. To undertake an assessment of any of these options on an individual basis would have been particularly time consuming and unlikely to offer any practical alternatives.	No change to the SA
Whole doc.	Home Builders Federation CR 139/10	Objection: The SA process is flawed as it does not factor in the implications of the policy highlighted above in terms of affordability and housing delivery. Therefore considered to be highly unsustainable in its approach.	Assessments of viability have been undertaken to support adopted Local Plan policy HS.8, and more recent research carried out by Fordham Research on Housing Requirements. It was therefore considered that no adverse impact from this SPD would effect either affordability or delivery of housing. Nevertheless an additional	New sub-section providing additional text on implementation and monitoring Paras. 81A, 81B, 81C, 81D and 81E.

			section relating to implementation and monitoring is proposed to be added to the supporting text.	
BALANCE OF DWELLINGS STUDY (Background Paper)				
Whole doc.	Home Builders Federation CR 139/11	Objection: Where any affordable housing policy is introduced it has to be based on robust and credible evidence (housing market assessment in partnership with house building industry), which assesses the implications of policy outcomes on site viability and overall housing delivery. It is beyond the remit of the planning system for local authorities to dictate the type and size of market housing.	Policy guidance in both PPS1 and PPS3 supports the need to create sustainable communities, which offer a choice of housing styles and types. The SPD seeks to provide advice on how a mix of dwellings, required by adopted Local Plan policy, can be achieved on new residential developments. The policy guidance allows a reasonable measure of flexibility for the developer to choose the balance of dwelling units, and the proportion of family housing together with an allowance for smaller units. The Panel Report (para. 8.32) recommend, in relation to Policy HS6, that local authorities should be encouraged “to provide guidelines on housing mix and density (as PPS3), where possible in advance of land being marketed to have the maximum chance of influencing the purchase price and hence the development expectations.”	No change to the SPD.
Whole doc.	Rectory Homes CR 00017/3	Objection: Whilst it is recognised that the stock of 3 bed units is decreasing as a result of redevelopment and conversions the background paper makes an unevidenced ‘leap of faith’ that this requires some policy intervention to	The Background Paper sets out the evidence in some detail. It assesses the stock of housing in Oxford, analyses the trends in housing supply, considers future population and household forecasts, future housing requirements,	No change to the SPD.

		redress non-existent imbalance.	and then estimates how the supply would have to change to ensure that it reflected future housing need.	
Whole doc.	John Phillips Planning Consultancy CR 171/12	Objection: This background paper does not provide a justified basis for the policies which the SPD seeks to introduce, particularly where the emphasis is on the retention of family houses. Surprising that only Blackbird Leys is identified as a green area, suggesting that the policy is too broad and localities too generally assessed.	The Background Paper sets out the evidence in some detail. It assesses the stock of housing in Oxford, analyses the trends in housing supply, considers future population and household forecasts, future housing requirements, and then estimates how the supply would have to change to ensure that it reflected future housing need.	No change to the SPD.
Whole doc.	Goodmans International CR 00018/4	Objection: The evidence base should be revisited in the light of the Panel Report for the South East Plan. The recommendation for a review of the Green Belt south of Grenoble Road for a mixed-use allocation provides a significant opportunity for family housing. This should allow the SPD to take a more flexible approach to 'strategic sites', within the City.	A possible new urban extension will not alter the need to maintain and promote existing communities. The SPD can only provide guidance for sites lying within Oxford City Council's boundaries. If Government accept the recommendations of the Panel Report this advice will provide a good starting point for future discussions with South Oxford over the proposed mix of dwellings for any future 'urban extension.'	No change to the SPD.
Paras.3.35-3.39	Home Builders Federation CR 139/8	Objection: DTZ research commissioned by SEERA & SEEDA on the matter of household type and size recommended that local authorities should not seek to control the size and type of dwellings provided by the private sector. The house	Policy guidance in both PPS1 and PPS3 supports the need to create sustainable communities, which offer a choice of housing styles and types. The SPD seeks to provide advice on how a mix of dwellings, required by adopted	No change to the SPD.

		<p>building industry is better able to interpret demand and controls would only hamstring the industry at a time when increases in both quantity and quality of housing is required. Recommendation accepted by SEERA.</p>	<p>Local Plan policy, can be achieved on new residential developments. The policy guidance allows a reasonable measure of flexibility for the developer to choose the balance of dwelling units, and the proportion of family housing together with an allowance for smaller units. The Panel Report (para. 8.32) recommend, in relation to Policy HS6, that local authorities should be encouraged “to provide guidelines on housing mix and density (as PPS3), where possible in advance of land being marketed to have the maximum chance of influencing the purchase price and hence the development expectations.”</p>	
Para 5.40	Kier Property & Worcester College CR 126/4	<p>Objection: Is 2 bed accommodation considered to be ‘family’ accommodation, since Fig.5.13 appears to confirm that families will occupy the new build 2 bed accommodation in Oxford. This may represent the only form of affordable market housing available to young families.</p>	<p>Fig. 5.13 does recognise that a wide range of household types occupy a range of properties. The mix of dwellings therefore accepts that some 2 bed houses in particular would add to the supply of accommodation available to families, it is considered however that 3 bed units would provide the principal source. The policy approach of not distinguishing between houses and flats does to a degree address the affordability issue.</p>	No change to the SPD.
Para 8.1- 8.47	Kier Property & Worcester College CR 126/5	<p>Objection: Research and evidence base relies on certain assumptions and projections which are subject to error. Unclear for</p>	<p>Background Paper sets out the detailed evidence for this SPD and explains the underlying assumptions used. The</p>	No change to the SPD.

		example whether student accommodation on purpose built sites has been taken into account and the effect this may have on releasing housing stock.	requirements of students is assessed in section 8 Housing Supply trends, which considers the impact on the existing housing stock.	
Para 7.1- 7.34	Kier Property & Worcester College CR 126/6	Objection: Has any allowance been made for the trend in retired people to downsize to high quality flatted accommodation which will free-up larger housing units for family occupation.	The policy guidance has taken this factor into account by providing a balanced mix of dwelling units for future occupiers. The changes to the housing stock by 2026 seek to accommodate the demographic needs of the growth in the elderly population.	No change to the SPD.