

HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

Joint Local Plan

Pre-submission Publication Version
(Regulation 19)



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APPENDIX A: Site Proformas (Please see separate document)

**South Oxfordshire and Vale of White Horse
Housing and Economic Land Availability Assessment
Main Report – Revised October 2024**

Introduction

1. A Housing and Economic Land Availability Assessment (HELAA) is an evidence base document accompanying our Joint Local Plan 2041. It is an audit of land and sites across our two districts that are assessed for their suitability, availability and achievability for a promoted use (usually focused on housing and/or economic uses).
2. It involves a broad assessment of sites against a range of environmental, heritage and physical constraints and demonstrates what the potential capacity is for new development in our districts over the next fifteen years.
3. It does not take into account how much development is needed but provides a high-level assessment of how much land *could* be expected to come forward for development, the type and size of development that *could* come forward, and when it *could* come forward.
4. The HELAA lists and maps sites that have been assessed.

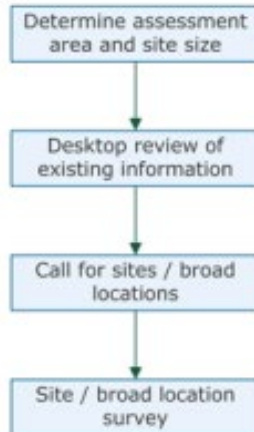
The HELAA does not allocate sites or grant planning permission, it only identifies sites that may have development potential.

5. HELAAs are an important source of evidence to inform plan-making and brownfield registers and can assist in the identification of a five-year housing land supply. However, HELAAs do not, in themselves, determine whether land should be allocated or granted planning permission for development. Similarly, if land is not included in a HELAA, it does not in any way preclude its future development, provided it is consistent with the planning policy framework that exists at the time.
6. The HELAA is a ‘snapshot’ of land availability, based on the information available at the time of the assessment. Therefore, the assessment and conclusions about sites and the overall capacity of the districts may be subject to change over time.
7. HELAAs are an essential resource and starting point for a site selection process that may be carried out if a Local Plan makes residential or economic allocations.

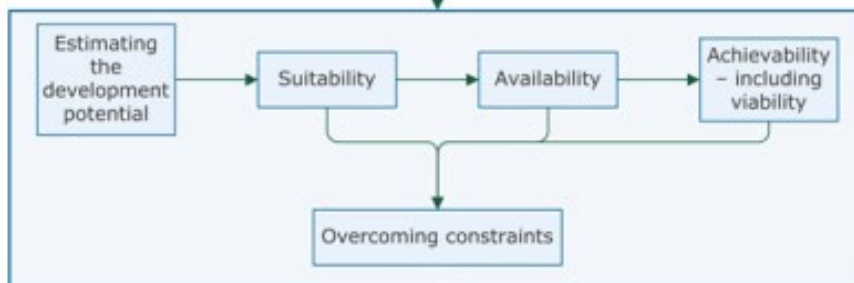
8. National guidance on how HELAAs should be carried out is currently provided in the [Planning Practice Guidance](#) (PPG) which accompanies the [National Planning Policy Framework](#) (NPPF) The NPPF was last updated on 20 December 2023, however the relevant sections of the PPG were last updated in July 2019.
9. We worked together with other Oxfordshire authorities to prepare a Joint HELAA methodology as part of the work on the Oxfordshire Plan 2050 (which is no longer progressing). The Oxfordshire-wide joint methodology was consulted on in April/May 2021. This methodology followed national guidance but also allowed for each authority to take account of local circumstances. More information about the Oxfordshire Joint HELAA methodology process can be read in our Duty to Cooperate Statement.
10. We have followed [national guidance](#) and taken account of the Oxfordshire Joint HELAA methodology when putting together the methodology for our HELAA.
11. The PPG sets out a five-stage process for undertaking HELAAs (Figure 1).

Figure 1: PPG Summary of HELAA Process

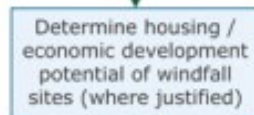
Stage 1 - Site / broad location identification



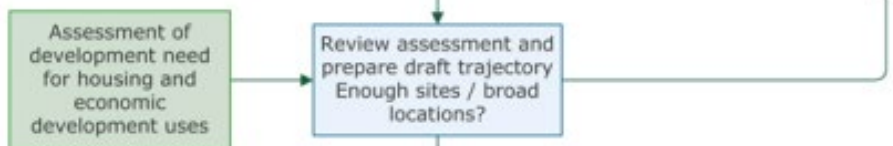
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



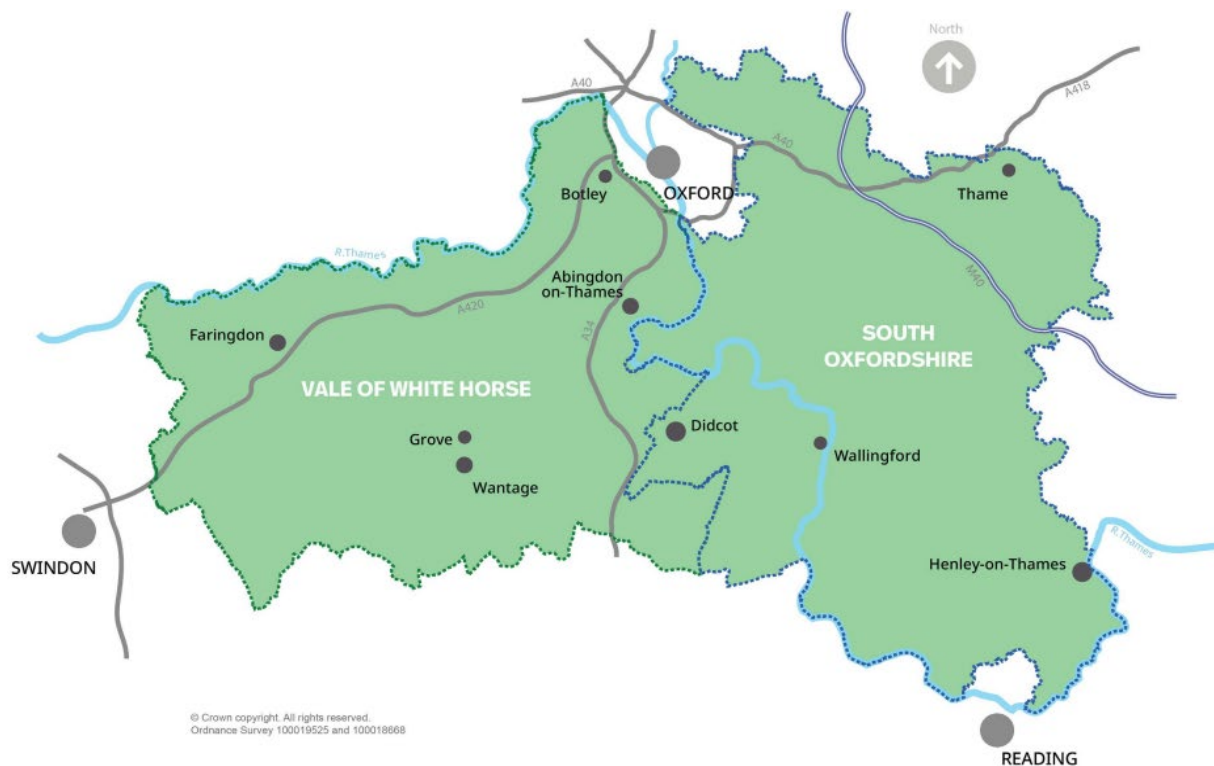
HELAA Methodology

Site Identification

Assessment Area

12. The PPG states that the geographical area selected for assessment should be the plan-making area. The Joint Local Plan covers the administrative boundaries of South Oxfordshire and Vale of White Horse, therefore, the HELAA assessment area covers the whole of South Oxfordshire and Vale of White Horse, as mapped below:

Figure 2: Map of South Oxfordshire and Vale of White Horse:



Land Uses

13. HELAAs are used to assess land availability for residential and economic uses.
14. Potential HELAA sites can include land that is currently undeveloped (greenfield), as well as developed land or buildings that could be converted into new uses or re-developed (brownfield).
15. The Town and Country Planning (Use Classes) Order 1987 (as amended) groups uses of land and buildings into various categories known as 'Use Classes'. To undertake the HELAA, housing is defined as falling within Use Class C3 (residential dwellings).

16. The guidance on HELAAs says that councils may choose to incorporate additional types of housing within their land availability assessments should they consider this to be appropriate. We have included Gypsy, Traveller and Travelling Showpeople's sites in our HELAA and invited landowners to make submissions for this type of housing to us through our Call for Land exercises. To undertake this HELAA, economic uses are defined as development falling within the following Use Classes:

- Use Class B2 - industrial
- Use Class B8 - storage or distribution
- Use Class E (g) (i) (ii) (iii) - commercial, business and service uses

17. Sites in the HELAA that were submitted before 1 September 2020 (i.e. before Use Class E was introduced), may still refer to its previous use class as B1.

Size Thresholds

18. For a HELAA, a local planning authority needs to decide on an appropriate size threshold above which sites will be assessed. Given that South Oxfordshire and Vale of White Horse are extensive rural districts covering large areas, it would be disproportionate to assess every small parcel of land. Consequently, we have adopted the threshold advised in the planning practice guidance, as set out below.

Residential Size Threshold:

Sites capable of delivering 5 or more dwellings or with an area of at least 0.25 hectares.

19. Sites that have a capacity for five or more dwellings will be included in the HELAA. If no capacity has been proposed by the landowner or the person who has submitted the site to us, or if the site has been identified by officers for assessment, a size threshold of 0.25 hectares has been applied. Anything below the threshold has not been assessed in the HELAA.

Economic Size Threshold:

Sites of at least 0.25 hectares or capable of delivering at least 500 square metres of economic floorspace.

20. To include land for economic uses within the HELAA, a size threshold of 0.25 hectares has been used unless a submission has been made to us (such as a 'call for sites' submission or planning application) that suggests the site may be capable of delivering 500 square metres or more of economic floorspace.

21. Capacity assumptions made to determine whether sites meet the threshold for inclusion are indicative only, and it does not necessarily reflect the amount of

development that might be appropriate on a site. No consideration is given to site constraints or planning policy requirements when determining which sites are assessed in the HELAA.

Desktop Identification of Sites

22. The PPG states that when carrying out a desktop review, local plan-makers need to be proactive in identifying as wide a range of sites as possible. Plan-makers must not simply rely on sites that they have been informed about, but must also actively identify sites through the desktop review process.

23. In preparing this HELAA we have used the following sources to identify sites:

Table 1: Data Sources

Data Source	Type of site identified
Adopted and Emerging Planning Policy Documents (This includes Local Plans, Supplementary Planning Documents and Neighbourhood Plans)	Buildings and land subject to adopted and emerging allocations
Planning Policy Evidence Base	Adopted and emerging Development Plan omission sites
	Buildings and land considered through the council's previous land availability assessment
	Buildings and land which an Employment Land Review (or similar) has identified as having development potential
	Buildings and land submitted directly to the Council including, but not limited to, buildings and land submitted through relevant call for sites, consultations and other engagement
	Buildings and land submitted through the Oxfordshire Plan process, including (but not limited to) the Call for Ideas, where agreement has been given to share this information with the local planning authority
Local Authority Planning Application Records	Buildings and land with an extant planning permission or prior approval that is yet to be implemented
	Buildings and land with a refused planning application or prior approval application within the previous 12 months
	Buildings and land with a withdrawn planning application or prior approval application within the previous 12 months

	Buildings and land with a dismissed planning appeal within the previous 12 months
	Buildings and land subject to an undetermined planning application or prior approval application
	Land subject to an undetermined planning appeal
Local Authority Brownfield Land Registers (Parts 1 and 2)	Buildings and land with permission in principle
	Brownfield land
Local Authority Empty Property Register	Vacant and derelict buildings and land
Local Authority Land Ownership Records	Buildings and land in the local authority's ownership
National Register of Public Sector Land	Surplus and likely to become surplus public sector buildings and land
Engagement with other public bodies via the call for sites	Surplus and likely to become surplus public sector buildings and land
Ordinance Survey Maps, Aerial Photography and Site Visits	Potential opportunities for intensification, redevelopment or redesign
	Potential opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)
	Potential opportunities to extend existing settlements
	Potential opportunities for new settlements
	Other land identified by officers or members

24. At the site identification stage, all sites that met the residential and economic size thresholds were included in the assessment for comprehensiveness, regardless of constraints.

Call for Sites/ Call for Land

25. Between 19 August and 30 September 2021, we invited landowners, agents, developers, community groups and others who were interested in having land considered for development, to submit information to us on the sites they wanted to be assessed.
26. This was called our 'Call for Land and Buildings Available for Change'. This process, part of every local plan, is usually referred to as a Call for Sites. During our consultation, we were particularly keen to hear about brownfield sites or existing buildings which could be converted into new uses or redeveloped, to reduce the scale of greenfield development that we may have needed to plan for. The name change we used reflected that, as well as land for housing and jobs, we gave an opportunity to submit sites for community and environmental uses (e.g. nature reserves, allotments and parks) or renewable energy uses (e.g. wind or solar farms).
27. Following the PPG, the “call” was aimed at as wide an audience as we could practically include, so that those not normally involved in development had the opportunity to contribute ideas for sites. Submitted sites made through this exercise supplemented the sites previously submitted as part of the Vale of White Horse Call for Sites which took place in 2020.
28. We accepted submissions made after the Call for Land consultation closed, as well as any additional sites submitted through the Local Plan Regulation 18 Part 1 Issues Consultation (which ran from 12 May to 23 June 2022) and the Regulation 18 Part 2 Preferred Options Consultation (which ran from 10 January to 26 February 2024).
29. We also included any sites submitted through the Oxfordshire Plan for Ideas (2020) and Oxfordshire Plan Call for Sites (2021) that were situated within our districts. The Oxfordshire Plan was a joint strategic plan being prepared by all Oxfordshire district councils and Oxford City Council but is no longer being progressed. The individual councils are now progressing their own local plans, or, in our case a Joint Local Plan.

Sites with Overlapping Boundaries

30. Some sites identified and assessed in the HELAA may correspond or overlap with each other (e.g. where a site has been promoted to us at different plan making stages with slightly different boundaries) and with allocated housing or employment sites (as identified in Chapters 6, 7 and 8 of our Joint Local Plan). Where this occurred, we did the following:
 - In the case of duplicate sites with identical boundaries, we have reported only once, using the more recently submitted site boundary and information.

- Where site boundaries overlapped, but were different, we checked the data source and used the most recent site boundary, where it was clear that site should be enlarged or reduced.
- Where two or more sites overlapped but were distinct (i.e. a small site located within a much larger one), these were assessed individually, with commentary provided on the suitability, availability and achievability of each individual parcel of land. We recognise that this may have resulted in an element of double counting when calculating the capacity of the sites.

Site Assessment

31. Our HELAA has been carried out in two stages: an initial assessment (Step 1) and a further assessment taking account of national policy and guidance (Step 2). We have assessed all identified sites above the minimum size thresholds (see para 18-20).

Step 1 – Initial Assessment

32. The PPG states that there may be some sites not suitable for development when considering national policy and designations which are ‘absolute constraints’. The Joint Oxfordshire HELAA methodology cited the following as absolute constraints across our local area:

Absolute Constraints
Land within Flood Zone 3b
Sites of Special Scientific Interest
Special Areas of Conservation
Special Protection Areas
Town Greens
Ancient woodland
Scheduled monuments
Registered parks and gardens

33. Sites that fall wholly within these constraints have been removed at Step 1 because there is no prospect of them being suitable for development.
34. Where a site is partially covered by an ‘absolute constraint’ we have calculated how much of the site remains outside the constraint/s and removed those that fall below the size threshold of 0.25 hectares (or 5 homes/500sqm of economic floorspace).
35. We have also removed sites where we determined that there was no additional capacity for further development on them. For example, sites that have full planning permission and are under construction.

Summary of Step 1 Initial Assessment:

Sites assessed against absolute constraints.
Sites with absolute constraints that fell below the size threshold considered unsuitable and removed from further assessment.
Sites with no further capacity for development removed from further assessment.
All other sites continue through to Step 2 for further consideration.

36. Overall a total of 91 sites (38 in South and 53 in Vale) were removed from further consideration following the Step 1 assessment. For transparency, we have included a full set of site proformas at Appendix A. (see separate PDF document).

Step 2 – Further Assessment

37. We then carried out a second stage of assessment looking at additional suitability criteria.

Suitability

38. We reviewed national policy and guidance, with particular reference to the constraints listed in footnote 8 of the NPPF and applied the following criteria to determine whether sites were suitable for further consideration:

Sites considered unsuitable for further consideration:
Sites that are entirely in the Green Belt AND are entirely greenfield/ not within the built-up area of a settlement.
Sites that are within National Landscapes (formally known as AONBs) AND are greenfield/ not within or adjacent to the built-up area of a settlement.
Sites within Flood Zone 3a where the land left that is outside of the flood zone is below 0.25 ha (the threshold for inclusion in the HELAA).

39. These criteria are explained in more detail below.

Green Belt

40. The construction of most new buildings in the Green Belt is considered inappropriate development, as set out in national planning policy (NPPF). Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. However, there are cases where national policy allows limited Green Belt development in settlements (e.g. limited infilling in villages) and on brownfield sites, so for the HELAA, Green Belt sites that are greenfield and in the countryside (not within a settlement) are removed from further assessment at Step 2.

National Landscapes

41. For sites situated within National Landscapes (formerly Areas of Outstanding Natural Beauty), national policy states that major development should not be permitted. However, major development is not defined and needs to be determined on a case-by-case basis. As well as requiring exceptional circumstances to justify development, there also needs to be a demonstrable public interest for allowing major development in National Landscapes. For this HELAA, sites within National Landscapes that are greenfield are unsuitable unless they are within or adjacent to a settlement.

Flood Zones

42. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Sites located in Flood Zone 3b (functional flood plain) have been excluded at Step 1 as this is an 'absolute constraint'. National policy requires plans to apply a sequential, risk-based approach to the location of development. Residential use is classified as 'more vulnerable', with an Exception Test required to develop in Flood Zone 3a. There is sufficient land available in the districts to justify not developing within Flood Zone 3a.
43. Notwithstanding the above, it is possible that a site comprising 'previously developed land' may also fall within Flood Zone 3b. In such instances, and where there are no other site constraints, we would categorise the site as 'appropriate for further consideration in the Joint Local Plan'. This is because, if the site has already successfully mitigated against flooding in its previous use, they may be opportunities to continue to do so, dependent on the type of land use proposed.

Agricultural land

44. National policy recognises the economic and other benefits of protecting the best and most versatile agricultural land (Agricultural Land Classification Grade 1, 2 and 3a). Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality (NPPF footnote 62).

45. There is sufficient available land in the district not to justify the development of Grade 1 agricultural land and so the HELAA originally took the approach that sites wholly or mostly comprising Grade 1 agricultural land, where the remaining land outside Grade 1 was less than 0.25 ha, were unsuitable for development and removed from further assessment. However, during the Regulation 18 (2) Preferred Options Joint Local Plan consultation, we received representations from a number of landowners/agents, challenging the reliability of DEFRA's Agricultural Land Classification (ALC) mapping, which we had used to calculate the extent of 'best and most versatile' agricultural land covering any site.
46. The DEFRA mapping is quite old now and it is possible that the agricultural land quality of some sites may have changed over time. Consequently, we have taken the decision to remove Grade 1 Agricultural Land as a development constraint from Step 2 of the HELAA site assessments.
47. Despite this change, agricultural land quality of a site remains an important consideration when assessing its development potential, and a more detailed site-specific assessment would still need to be undertaken later in the site selection process, if the councils needed to find more sites to allocate in the Plan and through any subsequent planning application processes.
48. Overall, a total of 274 sites were removed from further consideration following the Step 2 suitability assessment (165 in South and 109 in Vale). Full site proformas are available in Appendix A (see separate pdf document).

Availability and Achievability

49. Sites that have made it through the Step 1 and Step 2 assessment have then been assessed for their availability and achievability.

Availability

50. The PPG states that a site can be considered available for development when, on the best information available (confirmed by the call for sites, information from landowners and legal searches where appropriate), there is reasonable confidence that there are no legal or ownership impediments to development coming forward.
51. For this stage of the HELAA we have used the following criteria to determine if a site is available:
- Has the site been promoted in the last 5 years?
 - Does the site have planning permission?
 - Is the site an allocation in the local plan or a neighbourhood development plan?
52. If the answer is 'Yes' to any of the above questions, then the site is considered available in the context of the HELAA.

53. Sites that have been submitted through the following sources have been promoted in the last five years and are considered available:
- South Oxfordshire and Vale of White Horse Call for Land and Buildings (2021)
 - Vale of White Horse Call for Sites (2020)
 - Oxfordshire Plan Call for Sites (2021)
 - Oxfordshire Plan Call for Ideas (2020)
54. Sites from previous South Oxfordshire and Vale of White Horse Land Availability Assessments that have not been promoted in the last five years and are not subject to any applications or allocations are considered unavailable.
55. In a few cases, sites have been put forward for consideration through the HELAA by someone other than the landowner or promoter. This could have been with or without the landowner's knowledge. By taking the approach of assuming that all sites submitted to us are available, we recognise that this may mean we have assessed sites as available when the landowner has no intention of developing the site. Where we are notified of a landowner's intention, we will update our records and the assessment.
56. The HELAA is a point-in-time assessment, however, site promoters/owners may wish to comment on the availability of their sites as set out in Appendix A to this report.
57. Of the sites that are considered suitable, 457 sites (239 in South and 218 in Vale) are considered to be unavailable because they are not being actively promoted. These sites are included in Appendix A.

Achievability

58. The PPG states that a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.
59. South Oxfordshire and the Vale of White Horse are both viable locations for development. We are within a high value area where most forms of development would be achievable. We are therefore assuming for the purposes of the HELAA that all sites would be economically viable unless we have been provided with specific information to indicate otherwise.
60. Sites that are identified as not being suitable and/or available for development have been considered unachievable.

Estimating Development Potential

61. The PPG states that when estimating the development potential of a site, we can be guided by existing or emerging planning policy, including policies on density. Plan makers should seek to make the most efficient use of land in accordance with the NPPF.
62. The PPG also states that development potential is a significant factor that affects the economic viability of a site and its suitability for a particular use. Assessing achievability and suitability can helpfully be carried out in parallel with estimating the development potential.
63. Estimating the developable area of a site is an important part of considering development potential. As a minimum, we have excluded land covered by the following constraints from the developable area of a site:
- Land within Flood Zone 3b
 - Site of Special Scientific Interest
 - Special Areas of Conservation
 - Special Protection Areas
 - Town Greens
 - Ancient Woodland
 - Scheduled Monuments
 - Registered Parks and Gardens
64. In addition to removing the above constraints, we have applied a developable area threshold depending on the size of the site. This is to give a more realistic estimation of the capacity of the site, by removing a percentage of the site that will not have development on e.g. land reserved for open space, road infrastructure etc. We have made the following assumptions on developable areas, which are based on the assumptions used in the Land Availability Assessment prepared to support the adopted South Oxfordshire Local Plan 2035:

Site Size (hectares)	Net Developable Area Ratio (%)
< 1	100
1 to < 5	90
5 to < 10	80
10 and above	65

65. Assumptions made about developable areas at this stage remain indicative. We recognise that some areas excluded from the developable area could contribute towards providing open space or other infrastructure requirements, and that therefore the development area calculation should be regarded as a high-level assumption that is subject to change through the plan-making and decision-makers processes.

66. If, when assessing the development potential of a site, the developable site area or potential capacity falls below the HELAA size thresholds then the site has been excluded from further assessment.

Capacity on mixed use sites

67. Sites that do not have any residential element proposed will not be included when calculating capacity for homes. Where sites are promoted for a mixed use, we will assess the capacity of the site for each promoted use as if it had been proposed solely for that use. So, a site promoted for economic and residential uses generate two capacity assumptions and is effectively double counted.

Density Assumptions

68. The PPG states that estimating the development potential of sites can be guided by existing or emerging local plan policy, including on density. We have, therefore, applied density assumptions based on our current policy approaches.

69. Policy STRAT5 of the South Oxfordshire Local Plan 2035 expects sites in existing settlements and served by public transport to achieve densities of at least 45 dwellings per hectare (dph).

70. Policy CP23 of the Vale Local Plan 2031 Part 1 requires new developments to have a minimum density of 30pdh, with higher densities expected close to public transport routes.

71. Based on these existing policy approaches we have made the following density assumptions:

Density assumptions

- Inside a settlement – 45dph
- Outside / Adjoining a settlement – 30dph

72. Applying these assumptions on developable area and density allows us to make an indicative estimation of the capacity of sites.

73. Our emerging policy in the Joint Local Plan seeks to achieve densities of more than 45dph on sites that are well related to higher tier settlements, and served by public transport, or with good accessibility by foot or bicycle to town centres or a district centre within Oxford City. Whilst we are basing our assumptions on existing local plan policy, they also align with emerging policy.

Windfall Assessment

74. Both councils have a robust and demonstrable process for monitoring windfall supply - these are set out in our Housing Land Supply statements. The windfall supply amounts to 185¹ homes for South and 138² homes for Vale annually and this should be considered through the Joint Local Plan as a source of supply.

Housing Land Supply Trajectories

75. Once sites have been assessed, an indicative trajectory for when residential development could come forward is calculated. The PPG suggests that land supply trajectories should use the timeframes 0-5 years, 6-10 years and 11+ years to show when sites are likely to come forward.

76. To calculate an indicative trajectory for each site we have applied assumptions on lead-in times and build-out rates. We have used data from our Housing Land Supply statements to calculate an average build-in time and lead-in time for both districts, based on the capacity of the site. We acknowledge that the Housing Land Supply statement trumps any assumptions in the HELAA. You may also notice that, in a few cases, the residential capacity figure shown in the site proforma differs very slightly from the trajectory totals – this is due to ‘rounding’ in the formula we have used.

Site Size (Units)	Average South Oxfordshire Lead-in Times (Years)	Average Vale of White Horse Lead-in Times (Years)
500+	6.4	6.8
100 to 499	3.3	3.7
50 to 99	3.5	2.95
10 to 49	3.4	3.4

Site Size (Units)	Build out rates (units per year)	
	South Oxfordshire	Vale of White Horse
500+	150	114
100 to 499	54	44
50 to 99	35	37
10 to 49	17	16

¹ The justification for this figure is set out in the South Oxfordshire 5 year land supply statement: <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2023/09/2023-09-11-South-5YHLS-Report.pdf>

² The justification for this figure is set out in the Vale of White Horse 5 year land supply statement: <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2023/12/2023-12-05-Vale-5YHLS-Statement.pdf>

HELAA Findings and Reporting

77. We have updated this document to support the Regulation 19 Pre-Submission Publication version of the Joint Local Plan. Alongside, we are also publishing:

- [An interactive map of all sites assessed](#)
- An individual assessment of each site in a proforma, including a reason for removal, an indicative site capacity and a land supply trajectory, where appropriate (all contained within Appendix A)

78. In total, 1466 sites were assessed in the HELAA – 755 in South and 711 in Vale. A total of 365 sites (203 in South and 162 in Vale) were considered unsuitable and were removed from further consideration through the HELAA. A further 457 sites (239 in South and 218 in Vale) are not being actively promoted and are considered unavailable, leaving a total of 644 sites (313 in South and 331 in Vale) that are considered appropriate for further consideration through the Joint Local Plan process.

79. It is for the Joint Local Plan to determine which sites are required for allocation, drawing from information in this HELAA as required. Our HELAA demonstrates that there is sufficient capacity within both districts to meet our identified housing and employment needs.

Alternative formats of this publication, a summary of its contents or specific sections, are available on request.

These include large print, Braille, audio, email, easy read and alternative languages.

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