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OXFORD CITY COUNCIL

City Executive Board - Tuesday 16 October 2018

Item 8, Draft Local Plan

Appendices 2i, ii, iii, iv, v and v

8. **Draft Local Plan (Pages 3 - 558)**

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Oxford Local Plan 2036

Sustainability Appraisal and Strategic Environmental Assessment

September 2018

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Abbreviations explained

AMR – Annual Monitoring Report

AAP – Area Action Plan

AQMA – Air Quality Management Area

dpa – dwellings per annum, dwellings per year

HELAA – Housing and Employment Land Availability Assessment

HMO(s) – House(s) in Multiple Occupation

NPPF – National Planning Policy Framework

OAN – Objectively Assessed Need

PPG – Planning Practice Guidance

SA – Sustainability Appraisal

SAC – Special Area of Conservation

SEA – Strategic Environmental Assessment

SFRA – Strategic Flood Risk Assessment

SHLAA – Strategic Housing Land Availability Assessment

SHMA – Strategic Housing Market Assessment

SSSI – Site of Special Scientific Interest

1. Introduction

This Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) report was prepared to accompany the Oxford Local Plan 2036 Proposed Submission Draft, and forms part of the plan's evidence base. Preparation of an SA/SEA report is a legal requirement for local plans. This report is accompanied by a non-technical summary and a video.

Structure of this report

Chapter 2 summarises the Oxford Local Plan 2036.

Chapter 3 explains the SA/SEA process.

Chapter 4 summarises and updates the scoping report of 2016. It discusses the policy context for the plan; existing social, environmental and economic conditions; existing problems and issues; and the SA/SEA framework that is used in the rest of the report to assess different parts of the plan

Chapter 5 assesses the effects of the plan objectives.

Chapter 6 assesses the effects of the options considered during the development of the plan.

Chapter 7 assesses the effects of the plan policies and allocated sites.

Chapter 8 discusses the measures considered to minimise the plan's negative effects and maximise its positive effects.

Chapter 9 discusses how the plan's effects will be monitored.

Chapter 10 discusses how to comment on the Local Plan and this report.

2. Oxford Local Plan 2036

2.1 Background to Oxford City

Oxford City Council is a District Council at the heart of Oxfordshire. It has a total area of about 46 km^2 (17.7 $miles^2$), with parts of the urban area very densely developed. The built-up area extends to the administrative boundary around much of the eastern side of the city, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre.

Oxford's population is approximately 160,000 (June 2016) and is set to rise to around 180,000 by 2036. One-third of Oxford's population is aged between 18 and 29. Oxford is home to 32,000 students, and 4,600 businesses provide 114,000 jobs. There is a high level of in-commuting in the City: more than 40% of the city's workforce lives outside Oxford.

Oxford is a compact city with a unique and world-renowned built heritage. Its original Saxon street pattern and some of the earliest buildings and monuments still survive. Around 27% of Oxford is within the Green Belt which, unusually, not only constrains development in the outer cordon of the city, but also through the city's centre. Oxford sits at the confluence of the Thames and Cherwell rivers and is quite flat, so it is prone to flooding. The historic city parks and nature conservation areas create pockets and corridors of green within the administrative boundary; several have national and international nature conservation designations, further constraining development (Figure 2.1).

In recent years, Oxford has experienced a booming housing market with rising house prices. The average house price in Oxford is 16 times average earnings, making Oxford the most unaffordable place to live in the country. This has led to open-market housing becoming expensive and difficult to obtain. It has also limited the supply of affordable housing, and there is now a huge need for affordable housing. There are severe pressures on the housing stock, with concentrations of Houses in Multiple Occupation, many homeless and vulnerable people, and areas of deprivation with relatively high crime rates, health deprivation and poor educational achievement.

Oxford has remained economically very successful despite the global recession of the 2000s as well as the current climate of economic uncertainty. There is pressure to expand Oxford's employment offer, particularly in the 'knowledge sector', as a means to develop the Cambridge-Oxford knowledge spine.

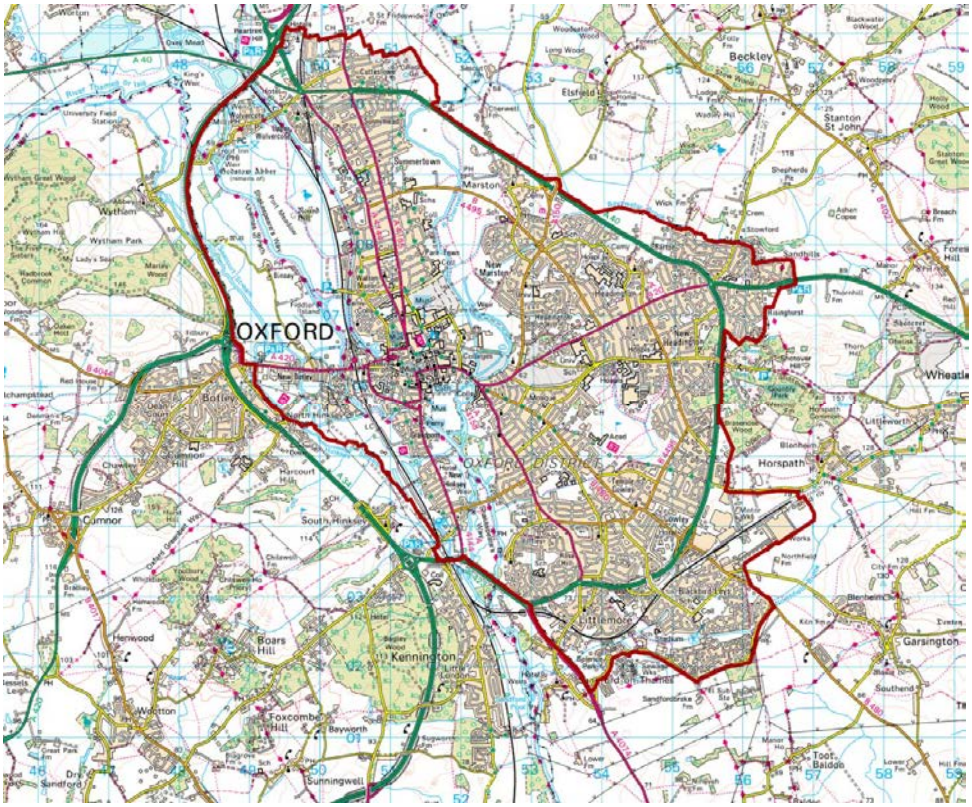


Figure 2.1 Map of Oxford Map © Crown Copyright and database right 2016. Ordnance Survey 100019348.

2.2 The Oxford Local Plan 2036

The SEA Directive requires a description of "an outline of the contents [and] main objectives of the plan" (Annex Ia)

The Oxford Local Plan will be the planning document in Oxford. It allocates sites for housing, employment and other uses such as retail. It provides policies for the management of development in the city, including for the preservation and enhancement of the historic environment, the conservation of nature and biodiversity, urban design, and flood risk management. It will be used in determining planning applications and to guide investment decisions across the city. Table 2.1 shows the plan's spatial objectives. Box 2.1 shows a table of contents for the plan, and Figure 2.2 shows the key diagram for the plan.

The Oxford Local Plan 2036 concentrates development on previously developed land, with development of significant greenfield sites only occurring on strategically identified sites. This will make the most efficient use of land as well as encouraging a denser city and protection of the open spaces and the 'green' setting of Oxford.

Table 2.1 Oxford Local Plan 2036 spatial objectives	
1. Building on Oxford's economic strengths	• To build on Oxford's economic strengths as a global centre for research, learning and healthcare • To remain at the heart of the Oxfordshire economy and an important contributor to the national economy in its key strengths in the knowledge intensive businesses (such as education, health, science and technology, and as a leading environmentally sustainable city)
2. Ensuring prosperity and opportunities for all	• To reduce inequalities across Oxford, particularly in employment, health and education • To provide a diverse range of employment opportunities to meet the needs of the city's businesses and residents, allowing the city to function sustainably, and with a skilled workforce ready to fill the employment opportunities that arise
3. A pleasant place to live, delivering housing with a mixed and balanced community	• To deliver as much housing as possible whilst balancing other important needs of the city's residents and businesses • To deliver affordable housing and ensure that it meets the requirements of those in need • To plan for an appropriate mix of housing sizes, types and tenures to meet existing needs and future anticipated needs as far as possible • To ensure new homes are adaptable to the changing needs of the population and resulting from climate changes, as well as being energy efficient to help reduce further climate change
4. Making wise use of our limited resources	• To achieve high levels of energy efficiency, water conservation and recycling, maximising Oxford's potential in high tech and low carbon technologies • To ensure efficient use of land by seeking opportunities for facilities to be multi-functional, and by maximising efficient use of scarce land • To achieve significant progress towards its net zero greenhouse gas emissions aspiration across Oxford, with the City Council leading by example by continuing to reduce its own emissions and increase its use of renewable energy
5. Securing a good quality local environment	• To achieve improved air quality • To manage water flow and help protect people and their property from the impacts of flooding
6. Protecting and enhancing Oxford's green setting, open spaces and waterways	• To protect and enhance a network of multi-functional green spaces and ensure easy access to high quality green space • Enhance green spaces so they deliver multiple benefits to health and wellbeing, are rich in biodiversity, and help the city adapt to climate change
7. Enhancing Oxford's unique built environment	• To preserve and enhance Oxford's exceptional built form with its legacy of archaeology and monuments, historic buildings, modern architecture, important views and distinctive townscape characteristics • Ensure that all new development delivers a high quality of urban design, place making, architecture and public realm, integrating historic buildings with modern needs
8. Ensuring efficient	• To ensure growth in the proportion of people walking and cycling to access jobs and facilities

Table 2.1 Oxford Local Plan 2036 spatial objectives	
movement into and around the city	• To provide enhanced facilities for walking and cycling, ensuring they are the primary modes for travel around the city • To ensure walking and cycling routes are complemented with well managed and attractive public transport routes, and that car use is minimised
9. Providing communities with facilities and services	• Promote local centres as hubs for the local community focus and identity, with transport interchange and activity and provision of a range of social, leisure, sport, and cultural facilities appropriate to Oxford's diverse communities, alongside housing and employment opportunities • To ensure that new development is supported by the appropriate infrastructure and community facilities
10. Ensuring Oxford is a vibrant and enjoyable city to live in and visit	• Maintain the regional role of Oxford city centre as a primary focus for shopping, employment, leisure and cultural activities, with district centres playing an increased but complementary role • To ensure the potential local benefits of Oxford's role as a major tourist destination are utilised

Box 2.1 Table of contents for the Oxford Local Plan 2036

Introduction, Strengths and Vision

1. Spatial Strategy

2. Building on Oxford's economic strengths and ensuring prosperity and opportunities for all

3. A pleasant place to live, delivering housing with a mixed and balanced community

4. Making wise use of our resources and securing a good quality local environment

5. Protecting and enhancing Oxford's green setting, open spaces, and waterways

6. Enhancing Oxford's heritage and creating high quality new development

7. Ensuring efficient movement into and around the city

8. Providing communities with facilities and services and ensuring Oxford is a vibrant and enjoyable city to live in and visit

9. Site allocations and areas of change

Oxford's affordable housing need was assumed to be 1,400 dwellings per annum, based on a policy approach of 50% delivery, in the 2014 Strategic Housing Market Assessment (SHMA). The 2018 SHMA Roll-forward to 2036 by GL Hearn confirmed this number to be 1,356 dwellings per annum. As there is a massive deficiency of available land within Oxford, a policy approach that required the amount of housing delivery to meet this need would be unsound. The Oxford Local Plan 2036 takes a capacity-based approach to planning which is far more realistic. This has included using the statutory 'duty to cooperate' with neighbouring Local Planning Authorities in order to manage Oxford's unmet housing need.

A lack of housing is currently a barrier to growth and thereby Oxford's economic vitality and security. The plan promotes both housing and employment growth, but it allocates new sites for housing whilst encouraging denser employment opportunities on existing employment

sites. This approach also aims to reduce the need to commute from outside Oxford into the city for work. The plan also encourages the 'knowledge' sector, capitalising on Oxford's global brand.

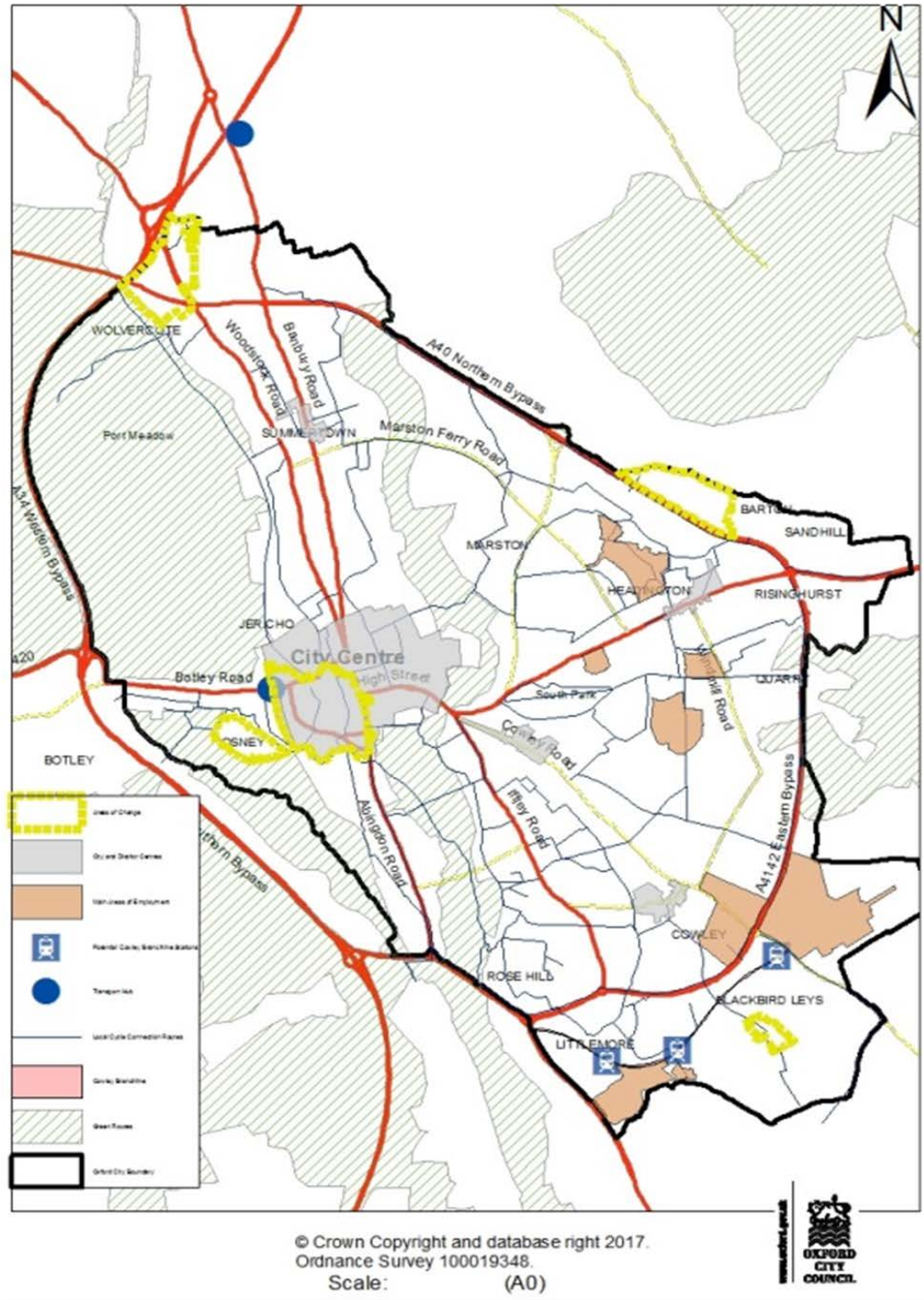


Figure 2.2 Key diagram for the Oxford Local Plan 2036

3. Strategic environmental assessment and sustainability appraisal

SA/SEA predicts and assesses the social, economic and environmental effects of the plan, and of other options considered while the plan was being developed. It aims to ensure that sustainable development is integrated into the plan making process. This section describes the legal requirements for SA/SEA and how this SA/SEA has been carried out.

3.1 Strategic environmental assessment

The European Strategic Environmental Assessment (SEA) Directive requires European Member States to carry out an environmental assessment as part of the preparation of land-use plans (e.g. Local Plans). The Directive was transposed into English law through the Environmental Assessment of Plans and Programmes Regulations 2004 SI No 1633.

The SEA regulations state that SEA must assess the likely significant effects of the plan or programme on:

- Biodiversity
- Population
- Human health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage, including architectural and archaeological heritage
- Landscape
- The inter-relationship between the above

Table 3.1 shows the SEA process.

Table 3.1 – The requirements of the SEA Directive and where they are covered in the SA/SEA for the Oxford Local Plan 2036

SEA Directive Requirements	Where covered in SA Report
a) an outline of the contents, main objectives of the plan or programme…	Sec. 2.2 of this report
… and relationship with other plans or programmes	Sec. 3 of the scoping report Updated in Sec. 4.1 of this report
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sec. 5 of the SA scoping report Summarised and updated in Sec. 4.2 of this report
c) the environmental characteristics of the areas likely to be affected	Site assessment report Tables 6.17 and 17.2 of this report
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sec. 5 of the scoping report Summarised and updated in Sec. 4.3 of this report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have	Sec. 5 of the scoping report

been taken into account during its preparation;	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 7 of this report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 8 of this report
h) An outline of the reasons for selecting the alternatives dealt with...	Chapter 6 of this report
… and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sec. 2 of the scoping report Sec. 3.4 of this report
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Chapter 9 of this report
j) a non-technical summary of the information provided under the above headings.	Separate non-technical report and video
Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4)	Consultation on the scoping report took place June-August 2016. Appendix 1 of this report shows the consultation responses.
authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	Consultation on the Oxford Local Plan 2036 Preferred Options Document took place June-August 2017.
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	To be carried out after plan adoption
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be carried out after plan adoption

3.2 Sustainability appraisal

In addition, the Planning and Compulsory Purchase Act 2004 requires all local planning authorities to carry out a sustainability appraisal (SA) of their Local Plans. SA is an iterative process to assist in the development of a Local Plan. It is used to appraise emerging options against the three elements of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the policies in the Local Plan. Table 3.2 shows the requirements for SA.

Table 3.2 – The Sustainability Appraisal (SA) Process

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Task A1: Identify other relevant policies, plans and programmes, and sustainability objectives

Task A2: Collect baseline information

Task A3: Identify key sustainability issues and problems

Task A4: Developing the SA Framework

Task A5: Consulting on the scope of the SA

Stage B: Developing and refining alternatives and assessing effects

Task B1: Test the Local Plan objectives against the sustainability appraisal framework

Task B2: Developing the Local Plan options including reasonable alternatives

Task B3: Evaluate the likely effects of the Local Plan and alternatives

Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects

Task B5: Propose measures to monitor significant effects of implementing the Local Plan

Stage C: Prepare the sustainability appraisal report

Stage D: Seek representations on the sustainability appraisal report from the consultation bodies and the public

Current state of Oxford Local Plan 2036 SA/SEA process

Stage E: Post adoption reporting and monitoring

Task E1: Prepare an publish post-adoption statement

Task E2: Monitor significant effects of implementing the Local Plan

Task E3: Respond to adverse effects

The SEA requirements can be integrated into the SA process. This SA report also fulfils the legal requirements for SEA; where reference is made within this document to SA, it also implies where appropriate SEA.

3.3 SA/SEA reports produced to date

The SEA Directive requires "a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex 1h)

This is the fourth SA report for the Oxford Local Plan 2036, as shown at Table 3.3. A scoping report was prepared in June 2016, which covered the requirements of Task A from Table 3.2. The scoping report was put out to consultation for six weeks between June and August 2016, at the same time as a plan Issues Consultation was carried out and drop-in sessions were held at various events. Eleven consultation events were held, and 608 responses were received in total. The SA scoping report was subsequently revised in response to the consultation comments. **Appendix 1** shows the comments on the scoping report made by the consultation bodies, and how the scoping report was modified in response to these comments.

Table 3.3 SA/SEA reports prepared to date

SA/SEA report	Report prepared by	Dates of consultation	Web-link to report
1. SA scoping report	Oxford City Council Planning team	27 June – 5 August 2016	https://www.oxford.gov.uk/downloads/download26/sustainability_appraisal_scoping_report_local_plan_2036
2. SA of preferred options document	Oxford City Council Planning team, audited by Levett-Therivel	30 June – 25 August 2017	https://www.oxford.gov.uk/download/downloads/id/3752/draft_sustainability_appraisal-_preferred_options.pdf
2a. Site assessment	Oxford City Council planning team	30 June – 25 August 2017	https://www.oxford.gov.uk/downloads/file/3755/site_assessments
3. SA of publication version plan	Oxford City Council Planning team and Levett-Therivel	1 November – 13 December 2018	This report

The preferred options for the plan were then appraised, covering Tasks B1 and B2 in Table 3.2. The appraisal also included an assessment of all of the options considered for the plan. **Appendix 1A** shows the comments received at this stage and how these comments were taken into account in the production of the final SA Report. A separate report assesses the impacts of the 126 (out of 516) preferred development sites and explains how the preferred sites were chosen. Both of these reports were consulted on for six weeks between July and August 2017.

A Consultation Report has been produced that shows how comments received on the preferred options have been taken account in the formulation of the policies. The Consultation Report is published as part of the evidence base submitted to support the Local Plan as part of the Consultation Stage.

This report, which brings together the findings of the previous reports and assesses the impacts of the publication version of the plan, is being made public for six weeks, from 1 November to 13 December 2018.

3.4 Difficulties encountered in compiling the SA/SEA

During the scoping stage, some areas were identified where there was inadequate information. The 2011 Census, on which some of the scoping report was based, is now seven years old; that information has been updated with more recent data where available.

Further studies were carried out where information was lacking, and they have informed the development of the Local Plan. For instance, the City Council commissioned a Level 1 and Level 2 Strategic Flood Risk Assessment, which have been used to assess flood risk in the city. A Green Infrastructure study will be used to develop the city's network of green spaces.

Information concerning social, environmental and economic issues is currently reported in the City Council's Annual Monitoring Report. The new Local Plan 2036 will involve a review of these indicators. As such there could be some gaps in the data, for instance where the information is not available in a suitable form.

Oxford also faces major uncertainties as a result of Brexit. More than 12% of Oxford's population and 13% of its workforce hold non-UK European passports. Sectors with particularly high numbers of non-UK European workers, and which could be negatively affected by Brexit, include biology, mathematics, the universities, BMW Mini, the NHS and the service sector. There is already evidence of highly-trained workers returning to the Continent because of continuing uncertainties around Brexit. The promotion of the Oxford – Milton Keynes – Cambridge 'knowledge arc' is, in part, a response to concerns about an economic downturn as a result of Brexit. In contrast, tourism to Oxford could grow as a result of the weaker pound[1].

3.5 Links to the Habitat Regulations Assessment

Oxford is home to part of the Oxford Meadows Special Area of Conservation (SAC), and internationally important nature conservation site. The SAC includes vegetation communities that are perhaps unique in reflecting the influence of long-term grazing and hay-cutting on lowland hay meadows. The site is designated as an SAC because of its lowland hay meadows (*Alopecurus pratensis, Sanguisorba officinalis*) and creeping marshwort (*Apium repens).* The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Port Meadow is the largest of only two known sites in the UK for creeping marshwort.

The City Council has carried out a Habitat Regulations Assessment (HRA) in dialogue with Natural England to determine whether the Oxford Local Plan 2036 would be likely to have an adverse impact on this site. HRAs were already carried out for the Oxford Core Strategy, the Sites and Housing Plan, the Northern Gateway AAP, and adjacent local authorities. The HRA for the Local Plan uses relevant material from these previous HRAs and updating studies where necessary. Its findings have been taken into account in this SA/SEA and in the development of the Local Plan.

[1] Oxford City Council 2017. LGA Call for Evidence: The impact of EU exit on places.

4. Scoping: summary and update

The aim of the SA scoping stage is to provide background evidence for use at subsequent stages of assessment. It comprises four steps:

Task A1: Identifying other relevant plans and programmes and sustainability objectives: "policy context"

Task A2: Collecting baseline information: "sustainability context"

Task A3: Identifying key sustainability issues and problems

Task A4: Developing the SA/SEA Framework

A detailed scoping report for the Oxford Local Plan 2036 was prepared in June 2016 (see Table 3.3). This chapter summarises the findings of the scopin

g report, and updates them to autumn 2018 where appropriate.

4.1 Task A1: Policy context

The SEA Directive requires a description of "[the plan's] relationship with other plans or programmes" and "The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex Ia and e)

Oxford's Local Plan 2036 will be influenced by a range of plans and programmes as well as external sustainability objectives. The key plans and programmes are discussed further below. The scoping report discussed sustainability objectives.

Oxford City Council Strategic Priorities

The City Council's ambition, which has been developed with partners among local businesses, community organisations, unions, the health and education sectors and the County Council, is to make Oxford a world-class city for all our citizens. The Corporate Plan 2016-2020 sets out the vision and strategy for the City Council:

Building a world-class city for everyone: By creating successful places in which to live and work and supporting people to reach their potential we will create a strong local economy and a city in which all our residents can thrive.

Partnership: Building strong and effective partnerships with businesses, communities, voluntary sector, universities and the public sector joining up investments and services.

Devolution: Working with neighbouring councils and our partners to ensure that Oxford has greater control over decisions on investments and services.

The Corporate Plan focuses on five interlinked strategic priorities which address the key needs of the city. The new Local Plan 2036 will help to deliver these:

- A Vibrant and Sustainable Economy;
- Meeting Housing Needs;
- Strong and Active Communities
- A Clean and Green Oxford
- An Efficient and Effective Council

Particularly relevant to planning are the measures of success from the corporate plan shown at Table 4.1.

Table 4.1 Oxford City Council Corporate Plan measures of success related to planning

Strategic Objective	Measure of Success
A Vibrant and Sustainable Economy	15,000m^2 from 2016/7 to 2019/20
Meeting Housing Needs	Planning permission granted for 400 new homes per year from 2016/17 to 2019/20
A Clean Green Oxford	Implementation of measures to reduce the City Council's carbon footprint by 5% each year

Strategic Housing Market Assessment (SHMA)

Oxfordshire has a strong and growing knowledge economy, and is an attractive location for employers. The Strategic Housing Market Assessment[2] of 2014 found that, to support Oxfordshire's high economic growth potential, about 100,000 homes would need to be provided between 2011 and 2031. This is significantly in excess of local housing need, but is consistent with the Oxfordshire Local Economic Partnership's ambitions for 85,600 more jobs between 2011 and 2031.

The Oxfordshire SHMA 2014 covers the period until 2031, so a roll-forward was commissioned by the City Council to understand housing need to 2036. The SHMA roll-forward has used the same methodology as the previous SHMA, but has used the most up-to-date household forecasts and has re-calculated economic growth. The 2018 SHMA roll-forward to 2036 found that, in order to meet Oxford's affordable housing need in full, based on a policy of 50% delivery of affordable housing, 1,356 dwellings per annum would be required.

Duty to Co-operate and Geographical Scope of the Sustainability Appraisal

Local planning authorities and other public bodies have a legal "duty to cooperate", to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plans in the context of strategic cross-boundary matters. The following are Oxford City Council's Duty to Co-operate partners:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)

[2] GL Hearn Limited 2014. Oxfordshire Strategic Housing Market Assessment.

- Natural England
- The Homes and Communities Agency
- The Oxfordshire Primary Care Trust
- Oxfordshire County Council
- Cherwell District Council
- South Oxfordshire District Council
- Vale of White Horse District Council
- West Oxfordshire District Council
- Oxfordshire Local Enterprise Partnership (LEP)
- Oxfordshire Local Wildlife Partnership (Wild Oxfordshire)

Figure 4.1 shows the district councils adjacent to Oxford.

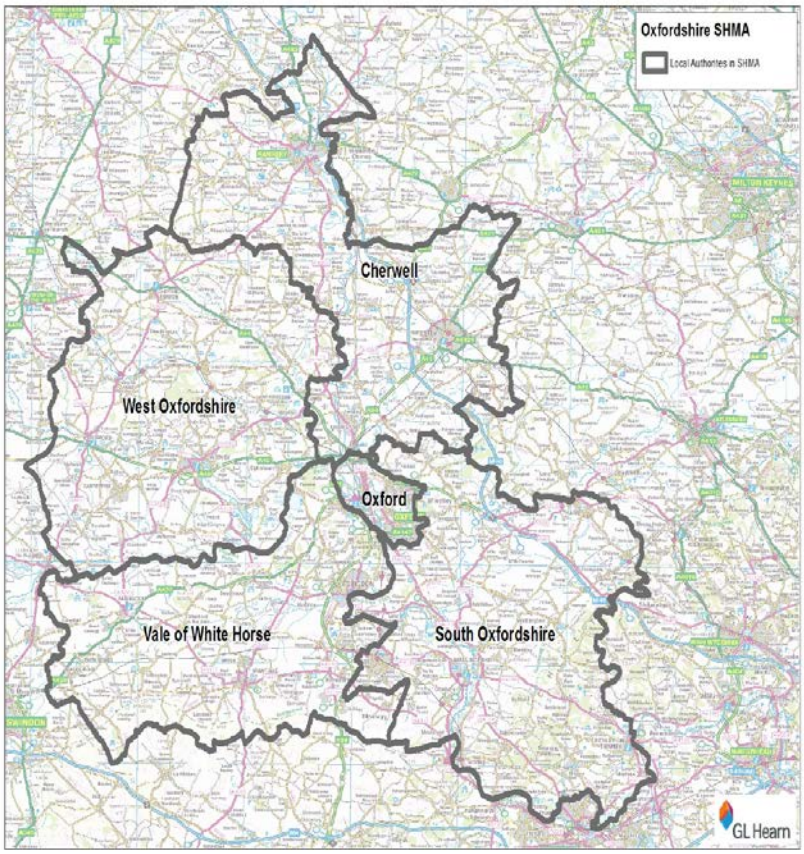


Figure 4.1 Districts adjacent to Oxford

One of the main cross-boundary matters in Oxford is housing provision. Housing need within the city is higher than the city can accommodate within its administrative boundary, and the Oxford Local Plan 2036 will need to locate some of Oxford's housing outside of its boundary. This will have an impact on neighbouring districts (Figure 4.1), and means that this sustainability appraisal needs to consider impacts beyond Oxford's boundary. In September 2016, all bar one

of the Oxfordshire local authorities signed a memorandum of cooperation[3] to apportion Oxford's unmet need. The Local Plans for the other Oxfordshire districts are delivering 13,100 dwellings to meet Oxford's unmet need as follows as shown at Table 4.3.

Table 4.3 Apportionment of Oxford's unmet housing need	
Cherwell DC	4400
South Oxfordshire DC	3750
Vale of White Horse DC	2200
West Oxfordshire DC	2750
Total	**13100**

In Autumn 2018, the current status of the other local authorities' Local Plans was:

Cherwell District Council Local Plan 2031: Cherwell District Council submitted a partial review of Part 1 of their Local Plan in March 2018. The plan allocates land for 4400 homes to address Oxford's unmet need. Independent Examination to commence in October 2018.

South Oxfordshire District Council Local Plan 2033: South Oxfordshire District Council decided in July 2018 to reconsider all its housing sites. It has adopted a working assumption of 3,750 homes towards meeting Oxford's unmet housing need.

Vale of White Horse Local Plan 2031: Part 1 of the Local Plan was adopted in December 2016. The Independent Examination of Part 2 of the Local Plan took place in summer 2018. Core Policy 4a of Part 2 allocates land for 2200 homes to address Oxford's unmet need.

West Oxfordshire District Council Local Plan 2031: The Inspector's report on the West Oxfordshire Local Plan 2013 suggests, as a main modification, that the district's housing requirements are increased to 15,950, including 2750 in respect of Oxford's housing need. This will be considered at Full Council on 27 September 2018.

Oxfordshire Housing and Growth Deal, Oxfordshire Strategic Economic Plan (SEP)

In February 2018, all of the local authorities in Oxfordshire signed a Housing and Growth Deal, whereby the authorities would receive up to £215 million of central government funding in return for delivering 100,000 homes by 2031. The assumption built in to this figure was that 1,400 dwellings per annum were required in Oxford to 2031. This requires achievement of a series of milestones, with funding contingent on the achievement of each milestone, as shown at Table 4.4. These figures were promoted by the Oxfordshire Growth Board in an ambitious Strategic Economic Plan[4] of 2016.

[3] Oxfordshire Growth Board 2016. Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area: Meeting the Objectively Assessed Need for Housing in Oxfordshire.
[4] OxLEP 2016. Creating the Environment for Growth: Strategic Economic Plan for Oxfordshire 2016.

Table 4.4 Milestones that need to be achieved as part of the Housing and Growth Deal	
Action	**Date**
Statement of Common Ground	31 March 2018
All Local Plans submitted for examination	1 April 2019
Draft joint statutory spatial plan	30 October 2019
Submission of joint statutory spatial plan	31 March 2020
Adoption (subject to examination)	31 March 2021

The Oxfordshire Infrastructure Strategy

The Oxfordshire Growth Board published the Oxfordshire Infrastructure Strategy in November 2017. This sets out ambitions for new and improved infrastructure to 2031 and beyond. Regionally and county-wide, the strategy supports an East-West rail link between Oxford, Bicester, Milton Keynes and Bedford; rail improvements between Oxford and Didcot; redevelopment of Oxford Station, and upgrades to the A34. In the long term, it also supports an Oxford-Cambridge expressway.

Within Oxford, proposed projects include:

- Several rapid transit lines e.g. Marston Ferry Road to Hollow Way, Blackbird Leys to city centre, Thornhill to city centre
- Super Cycle Routes along key arterial routes including the Abingdon Road and Woodstock Road
- Expansion of the Seacourt, Peartree and Redbridge P&R sites
- A range of road improvements
- A zero emission zone, first in the city centre and then city-wide
- A primary school for Barton Park, and a secondary school (Swan School)

These are shown at Figure 4.2.

The Oxford – Milton Keynes – Cambridge 'knowledge arc'

The high growth planned for Oxfordshire is part of the development of a 'knowledge arc' between Oxford, Milton Keynes and Cambridge. The 'knowledge arc' is being promoted by all of the local authorities along this corridor, and by the National Infrastructure Commission. In particular, the National Infrastructure Commissioning supports the East-West rail line and an Oxford-Cambridge expressway in its 2017 report 'Partnering for Prosperity'[5]. Figure 4.3 shows the proposed corridors for the Oxford-Cambridge expressway, as of September 2018.

[5] National Infrastructure Commission 2017. Partnering for Prosperity: a new deal for the Cambridge – Milton Keynes – Oxford Arc.

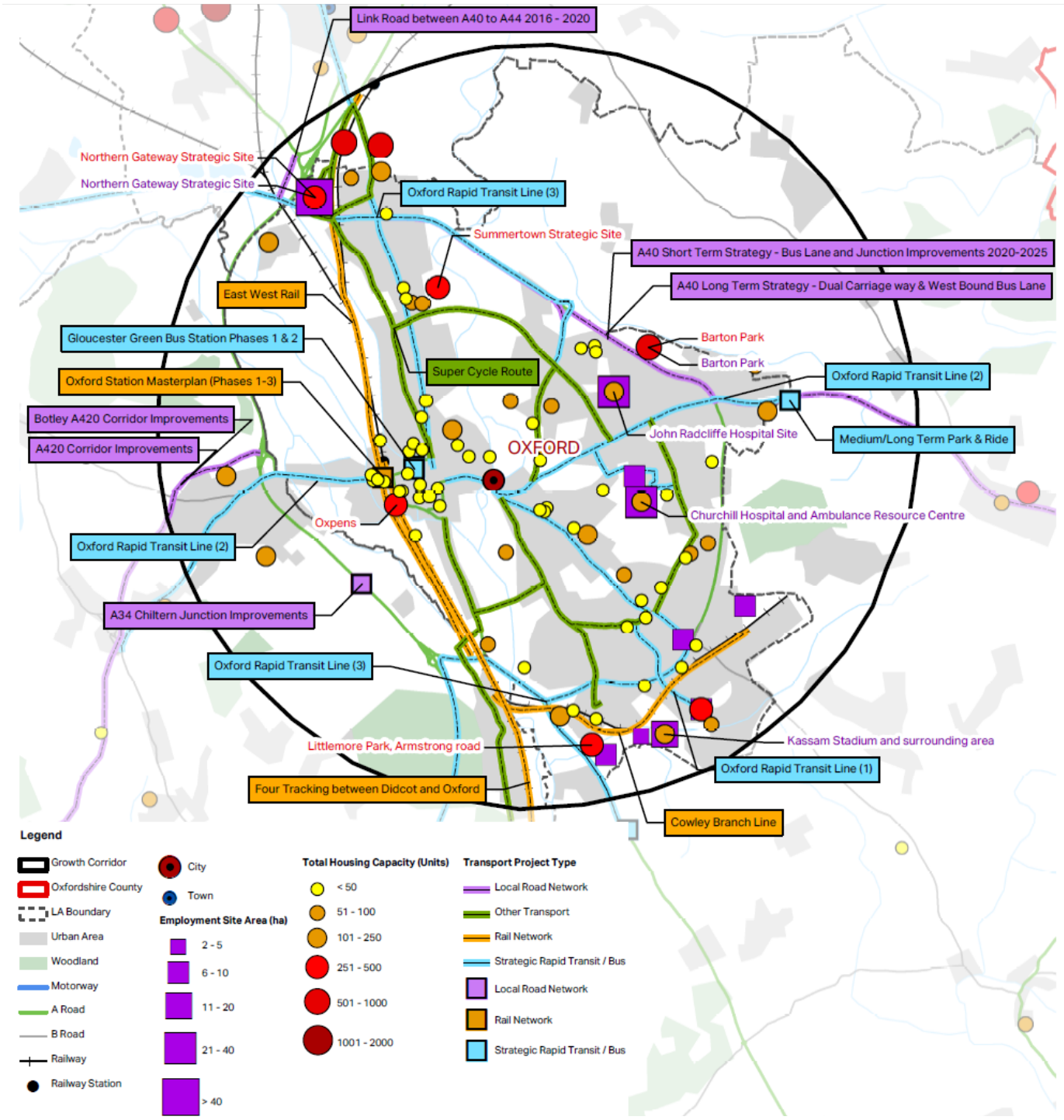


Figure 4.2 Oxfordshire Infrastructure Strategy proposals for Oxford

Note: The transport projects were not included in the figure in the final strategy, but are shown here for clarity

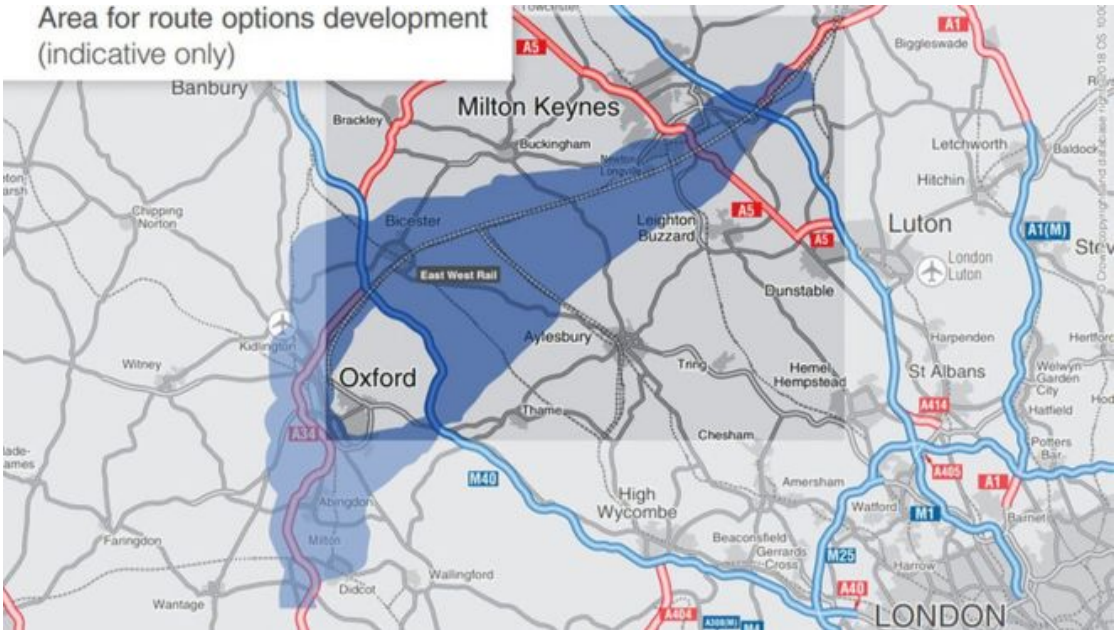


Figure 4.3 East-West rail and Oxford-Cambridge expressway corridors, September 2018

Other Key Plans, Programmes and Environmental Objectives

The most influential document on sustainable development at the international level is the **Kyoto Protocol on Climate Change** which commits parties to reduce their greenhouse gas emissions. In December 2015, as part of the 'Paris Agreement', European Union Member States committed themselves to a binding target of at least 40% reduction in greenhouse gas emissions by 2030 compared to 1990.

The European Union has also produced several documents influencing planning policy in the UK, including the **Habitats Directive** (92/43/EEC), **Air Quality Directive** (2008/50/EC) and **Water Framework Directive** (2000/60/EC).

A revised **National Planning Policy Framework** (NPPF) was published in July 2018. It sets out the Government's planning policies for England and how these are to be applied. It is supported by online National Planning Practice Guidance. Key NPPF requirements relating to Oxford are to:

- Meet objectively assessed housing numbers using a standard methodology
- Assess the viability of affordable housing
- Provide at least 10% of housing requirements on small and medium sized sites
- Protect the Green Belt except where exceptional circumstances are fully evidenced and justified
- Promote good design and well-designed places
- Promote sustainable transport
- Promote healthy communities
- Protect designated heritage assets
- Meet the challenge of climate change and flooding
- Conserve and enhance the natural and historic environment

The **Localism Act** 2011 introduced the right for communities to shape development in their areas through the production of Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders. Currently Oxford has four designated Neighbourhood Forums: Headington, Littlemore, Summertown/St. Margaret's and Wolvercote. The Headington Neighbourhood Plan was 'made' in July 2017; the Summertown/St. Margaret's plan was passed to an inspector in August 2018; and the other Neighbourhood Forums are working on their own Neighbourhood Plans.

The Oxfordshire Local Transport Plan (LTP4) of 2015, '*Connecting Oxfordshire',* sets out Oxfordshire County Council's policy and strategy for developing the transport system in Oxfordshire to 2031. LTP4 aims to:

- support jobs and housing growth and economic vitality;
- reduce transport emissions and meet our obligations from Government;
- protect, and where possible enhance Oxfordshire's environment and improve quality of life; and
- improve public health, air quality, safety and individual well-being

LTP4 includes an area strategy for Oxford as well as other strategies, including a bus strategy which sets out how improvements will be made to the county-wide bus network as well as developing rapid transit services along the busiest routes.

Brexit

In 2011, 11% of the city's population and 11% of its students were from elsewhere in the European Union[6,7]. Of Oxford's residents who voted in the EU referendum, 70% voted to remain in the EU.

Brexit may change things significantly for Oxford. A decline in students and skilled staff as a result of greater restrictions on EU nationals coming to the UK could affect the city's knowledge-related businesses, with wider effects on the Oxford-Cambridge growth arc. It could also reduce the pressure on housing in the city and adjacent local authorities. The weaker pound could attract more tourists to Oxford.

4.2 Task A2: Sustainability context

The SEA Directive requires a description of "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex Ib) and "the environmental characteristics of the areas likely to be affected" (Annex Ic).

The Scoping Report gives detailed information on the baseline conditions for Oxford, referring to relevant policies and objectives. It is organised by the background paper topics shown at Table 4.5. Table 4.5 also shows how these topics match the sustainability objectives discussed at Task A4, and the themes of the SEA Directive. This approach means that some additional

[6] https://www.oxford.gov.uk/download/downloads/id/1076/country_of_birth.xls
[7] https://www.oxford.gov.uk/download/downloads/id/2179/student_statistics_census_2011.xls

topics have been included to present information on issues such as housing, social inclusion, economy and tourism which are more directly related to the SA objectives than they are to the SEA themes.

Table 4.6 summarises the data from the Scoping Report and updates it to 2018 where appropriate. The table discusses the status Oxford-wide and, where appropriate, general areas of the city. Information on 'areas likely to be significantly affected' by the plan is provided in the site assessment discussed at Table 3.3.

Table 4.5 Links between background papers, SA objectives and SEA themes		
Background Paper topic	**SA Objective**	**SEA themes**
Environmental		
Flooding, water resources, water quality	1: Flooding 12: Soil, water resources, water quality	Water; climatic factors
Green spaces, biodiversity, open air sports	8: Green infrastructure 9: Biodiversity	Biodiversity; flora; fauna; landscape
Design, landscape and heritage	10: Historic environment	Material assets; cultural heritage; landscape
Transport	11: Transport and air quality	Air; climatic factors; material assets
Air quality	11: Transport and air quality	Air; climatic factors
Resources (previously developed land, soil, energy waste)	2: Vibrant communities 12: Soil, water resources, water quality 13: Resources	Soil; climatic factors
Social		
Housing affordability	3: Housing	Population; material assets
Housing needs and supply		
Housing types and sizes		
Students and language schools		
Health	4: Health	Human health
Poverty, social exclusion, crime, inequality	5: Poverty and social exclusion	Population
Skills and training	6: Education 14: Economic development	
Quality of essential services and facilities	7: Services and facilities	Material assets
Economic		
Employment and economy	14: Economic development	
Retail, district centres and city centre	14: Economic development	
Regeneration and economic revival	15: Regeneration areas	
Tourism	16: Tourism	

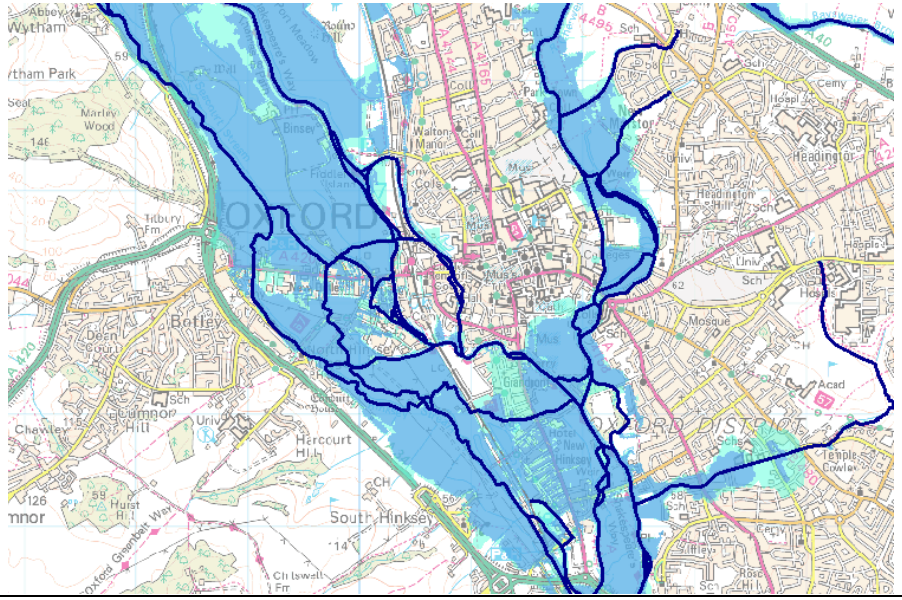
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
1. Water Flooding	There are around 4,500 properties at a 1% or higher risk of flooding within Oxford. The figure shows river flooding in Oxford.  	By 2080, without additional protection, nearly 6,000 properties could be at 1% or higher risk of flooding because of climate change. The Oxford flood alleviation scheme is expected to reduce this to about 1,800 properties. Climate change is also likely to result in hotter, drier summers; milder, wetter, winters; increased storm events; and more extreme weather events such as droughts or floods.
Water resources	Oxford is in an area of serious water stress. Most of the water in the region comes from surface water extraction. The Swindon and Oxford (SWOX) water resource zone currently has supplies that are 27M litres/day greater than demand, but demand is expected to exceed supply by 2020: Year: 2015	2020	2025	2030	2035	2040 SWOX water resource zone, million litres/day: 27.08	-0.14	-12.05	-21.30	-26.70	-32.66 Average water consumption in the UK is 150 litres/person/day (lpd).	By 2040, as a result of planned growth in the SWOX area, there will be an anticipated deficit of 33M litres/day. Thames Water is proposing to build a new reservoir at Abingdon. The government aims to reduce water consumption to 130 litres/day.
Water quality	Water quality figures for the Oxford area do not exist. The ecological status of rivers in the Thames River Basin district as a whole are show below.	The Environment Agency predicts that, by 2021, water

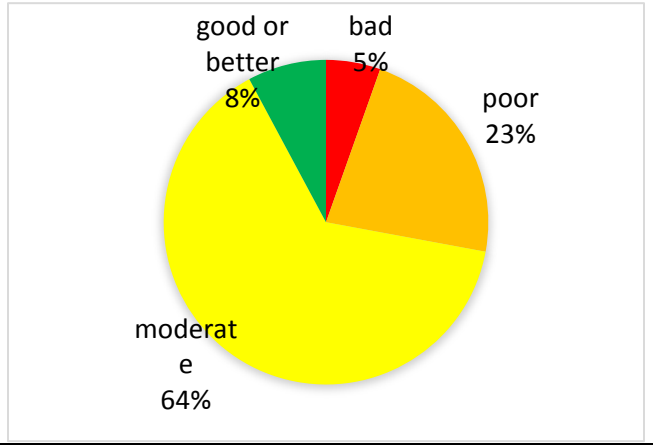
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
		quality in the Thames River Basin district will have improved slightly, to bad 4%, poor 22%, moderate 64%, and good 10%.
2. Green spaces Green Belt	A Green Belt study showed that the 'green wedges' within Oxford and smaller areas close to the urban area are particularly good for preventing urban sprawl and preserving the setting and special character of Oxford; and the larger parcels on the edge of Oxford are particularly good for preventing towns from merging into each other and safeguarding the countryside from encroachment.	

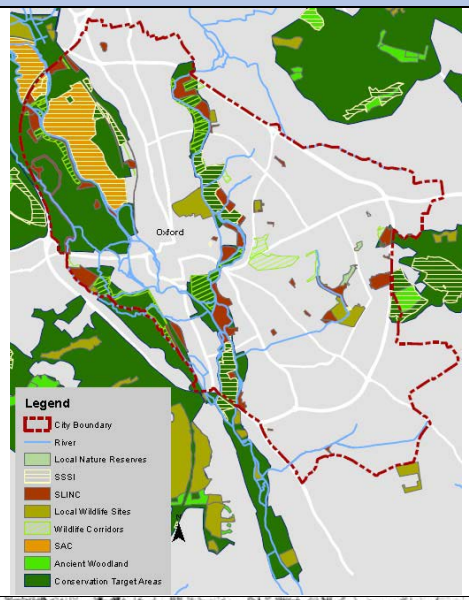
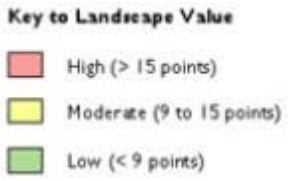
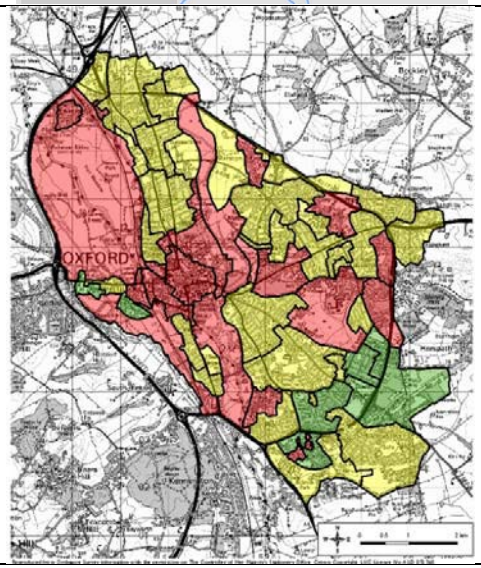
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
Nature conservation areas	The map shows areas of importance for wildlife in Oxford. The Oxford Meadows Special Area of Conservation is internationally important. Oxford also has a range of Sites of Special Scientific Interest, whose condition ranges from favourable to unfavourable declining. See also Sec. 4.3. 	Increasing development will put increasing pressure on Oxford's nature conservation areas and its landscape value
Landscape value of green spaces	The map summarises the landscape value of Oxford's green spaces.  	The Oxford Flood Alleviation scheme will go through the south-west part of Oxford, some of which has high landscape value.

Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
Sports and recreation provision, parks, allotments	There is currently a shortage of playing pitch provision, particularly for cricket. Demand for allotments increased sharply between 1996 and 2010 but has levelled off since then.	A growing population, and increased awareness of active lifestyles, means that there is likely to be increasing demand for outdoor sports provision, public open spaces and allotments in the long term.
3. Design, landscape and townscape, and the historic environment	Oxford is located in a floodplain overlooked by surrounding ridges which provide an important backdrop to Oxford's cityscape. Oxford has agricultural vales to the north and south, wooded hills to the east and the west, and river valleys extending through the urban core of the city. Oxford's character is also defined by its unique built environment: the iconic skyline and architecture produced by the limestone colleges and towering spires create a world-famous urban environment. Oxford contains buildings from every major British architectural period from the 11th century onwards. It contains 9 scheduled monuments, 15 Historic Parks and Gardens, 17 conservation areas, and around 1,500 listed buildings, with the proportion of grade I and II* as a total of all listed buildings being more than twice the national average. The Church of St. Thomas the Martyr and the Swing Bridge are on the Heritage at Risk Register.	The existing Local Plan has a strong suite of historic environment policies. Oxford continues to develop exciting new buildings at the forefront of modern architecture. In 2018, four of the eight RIBA South award winners were in Oxford. In 2017, three of the nine winners were in Oxford.

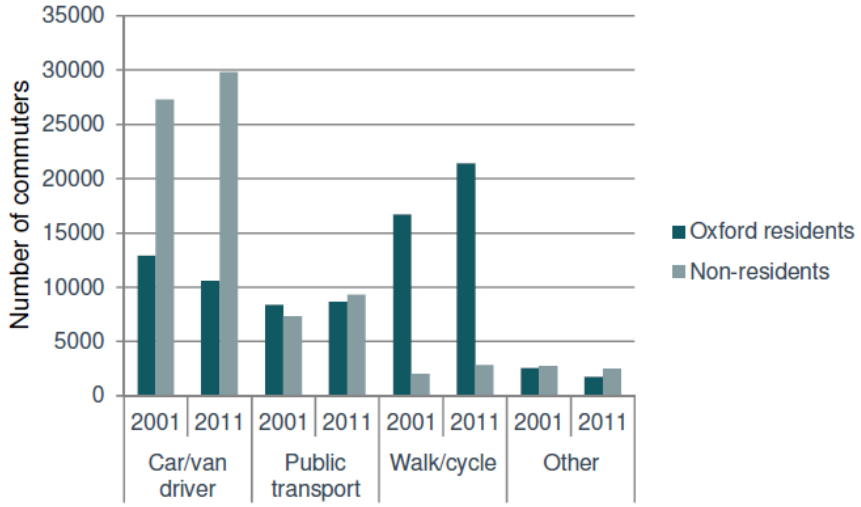
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
4. Transport Commuting patterns	73% of Oxford city residents work in the city, but almost half of Oxford's workforce (45,900 people) commuted into the city in 2011: this was a 14% increase from 2001. The greatest number of inbound and outbound commuters are from/to the Vale of White Horse.  Oxford city residents are much less reliant on the car for journeys to work than residents of other Oxfordshire authorities (34% compared with 63%). Oxford has the second highest proportion of people cycling to work in the UK, after Cambridge. It hosts four popular dockless bike schemes. It also has a high proportion of bus users. However the car remains the dominant form of transport to all destinations other than the city centre. The highest rate of car use in the city is in the Eastern Arc.	The Oxford Transport Strategy is promoting bus rapid transport. The rail network around Oxford will also be subject to a high level of investment over the next 15 years. Cycling levels in Oxford have remained steady or increased slightly over time. Driverless cars could save road space and have the potential for car-sharing, which in turn could reduce the need for private parking spaces. On the other hand, the highest number of new jobs in the city by 2031 are expected to be in North Oxford and the Eastern Arc, where car use is higher than in the rest of Oxford.

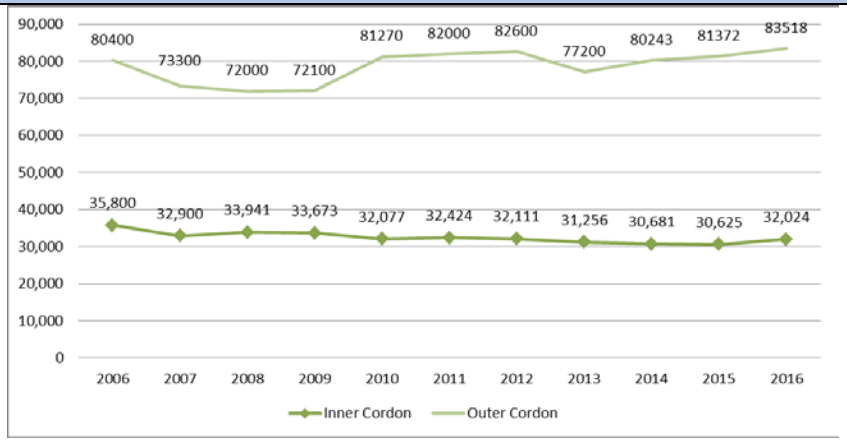
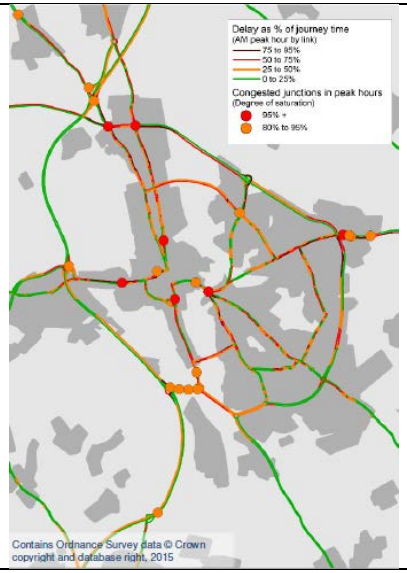
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	Traffic levels have not increased significantly in the outer cordon over time, and have decreased slightly in the inner cordon. 	The level of growth expected in Oxfordshire means that traffic levels and congestion are likely to worsen.
Traffic levels and congestion	Congestion is a persistent problem in Oxford. Within the centre there is a clear conflict between cars, buses and delivery vehicles which compete for the limited space with pedestrians and cyclists. The map shows congestions hot spots in Oxford. 	

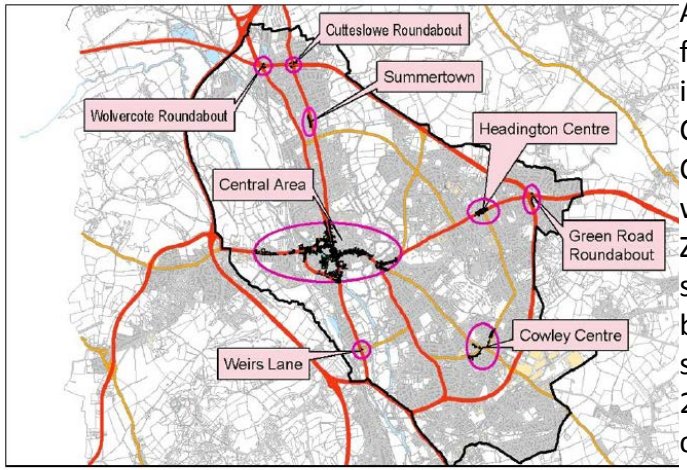
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
5. Air quality	Air quality has been improving in Oxford, but still exceed legal standards. For instance NO_2 levels are about 52µg/m^3, down from 65µg/m^3 in 1995, but above the national objective of 40µg/m^3 which needs to be met by 2020. The map shows air pollution hot spots in Oxford. All of Oxford is an Air Quality Management Area for NO_2.  Most air pollution in Oxford comes from motorised traffic. Three-quarters of the NO_2 comes from vehicles and, of that, almost two-thirds comes from buses and coaches. The introduction of a low emission zone in 2014 helped reduce emissions, but the improvement was not as dramatic as hoped.	Air pollution is unlikely to drop further without further intervention. In 2017, the City Council and Oxfordshire County Council proposed the world's first Zero Emission Zone for Oxford: this would see diesel and petrol vehicles banned in phases, from a small number of streets in 2020 to the whole of Oxford city centre in 2035. Electric, hybrid and lower emissions vehicles will become more widely used during the Local Plan period. However the growth in population and jobs expected to happen in Oxfordshire is likely to worsen congestion and air pollution.
6. Resources Soil and contamination	Oxford contains several wedges of agricultural land, primarily north of Binsey and in the Cherwell Valley. Almost all of the major former industrial sites have been remediated and redeveloped, but some smaller sites may still be contaminated.	
Previously developed land and density	Between 2010/11 and 2014/15, almost all housing completions were on previously developed or garden land. Since then, some development, notably at Barton, has been on greenfield land. Large developments of over 10 units have met the target of 40 or more dwellings per hectare.	As the population of Oxford continues to grow, there will be increased pressure for development, resulting in higher residential densities.

Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
Energy	Per capita CO_2 emissions in Oxford fell by 14% from 2005 to 2013. The Core Strategy and Local Plan require large developments to meet at last 20% of their energy needs on site through renewable and low carbon technologies.	It is likely that emissions from households will fall as a result of more efficient homes.
Waste	The proportion of household waste recycled and composted increased from 38.5% in 2006/7 to over 60% in 2011/12, and has broadly stayed at that level. The proportion of household waste sent to landfill has reduced from 61.4% in 2006/7 to 38% in 2011/12. The Local Waste Partnership was closed in 2014 as a result of funding cuts, so more up to data are not available.	Although waste per household is not expected to rise, the total amount of household waste is expected to grow from less than 300,000 tonnes/year in 2011/12 to just under 350,000 tonnes/year in 2029/30.
6. Housing Affordability and affordable housing	Oxford is the least affordable city in the UK, with average house prices more than 16 times the average wage in the city. Rental prices are similarly unaffordable. Many people who work in Oxford cannot afford to live here, leading to high levels of in-commuting, with associated environmental and health costs.	The affordability of housing in Oxford is likely to worsen without the plan, as the lack of land for housing and increasing land values push house prices up further. The supply of affordable housing is also likely to worsen.
Needs and supply	The 2014 Strategic Housing Market Assessment (SHMA) identified an 'objectively assessed need' for Oxford ranging between 24,000 and 32,000 additional new homes between 2011 and 2031. The 2018 SHMA roll-forward to 2036 found that, in order to meet Oxford's affordable housing need in full, based on a policy of 50% delivery of affordable housing, 1,356 dwellings per annum would be required. The Oxfordshire Housing and Growth Deal with Government, signed by all of the local authorities in Oxfordshire in February 2018, commits the Oxfordshire authorities to work together to deliver 100,000 homes in the 20 year period to 2031. The assumption built in to this overall figure was that 1,400 dwellings per annum were identified as required in	Oxford does not have the capacity to meet its 'objectively assessed need'. Oxford is collaborating with adjacent authorities to meet this need. Affordable housing supply is expected to be boosted by future major projects including Barton Park, land north of

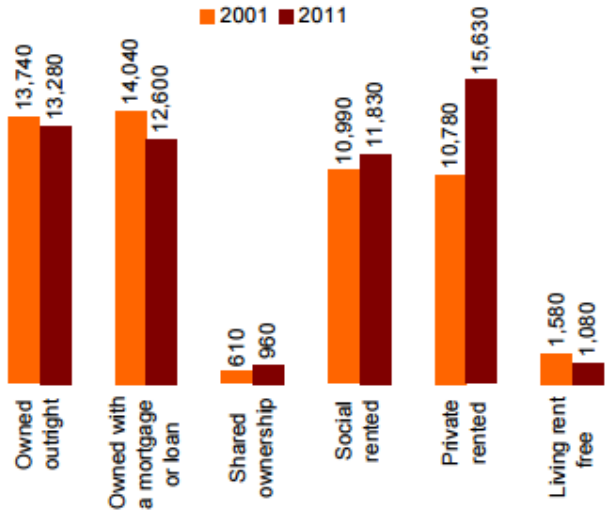
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	Oxford to 2031. Therefore, the housing target remains as it was in the 2014 SHMA, namely 1,400 per annum. In late 2017 there were almost 3000 households on the Housing Register, and only about 500 properties were expected to become available to let in 2017/18. About 380 homes/year have been built in Oxford since 2006/07. Of these, on average 107 homes/year have been affordable since 2006/07, but this has been dropping sharply. In 2016/17, for instance, only 20 homes were affordable. This is because very few large sites where the on-site provision of affordable housing would be required have been completed.	Littlemore Healthcare Trust, and Littlemore Park.
Types and sizes	The proportion of people owning their homes has been decreasing, while the proportion of people living in private rented housing has increased sharply, as shown by the figure. This trend is likely to have significantly worsened since the 2011 figures. About 20% of the population live in Houses of Multiple Occupation.  	There has been a trend towards smaller dwelling and flats in Oxford, many of which are conversions and garden land development. The trends towards increasing private rented housing and Houses of Multiple Occupation look likely to worsen.
Students and student accommodation	Core Strategy Policy CS25 requires each university to have no more than 3,000 full-time students living in Oxford outside of university-provided accommodation. The graph shows that the University of Oxford is achieving this target but Oxford Brookes University is not.	Student numbers at both universities have increased over time. This may change with Brexit. Oxford Brookes University is

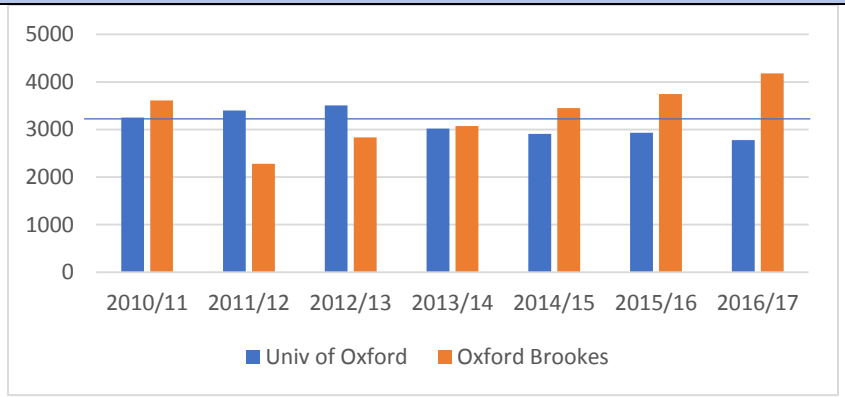
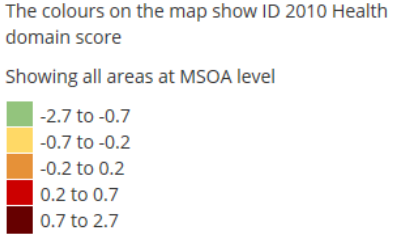
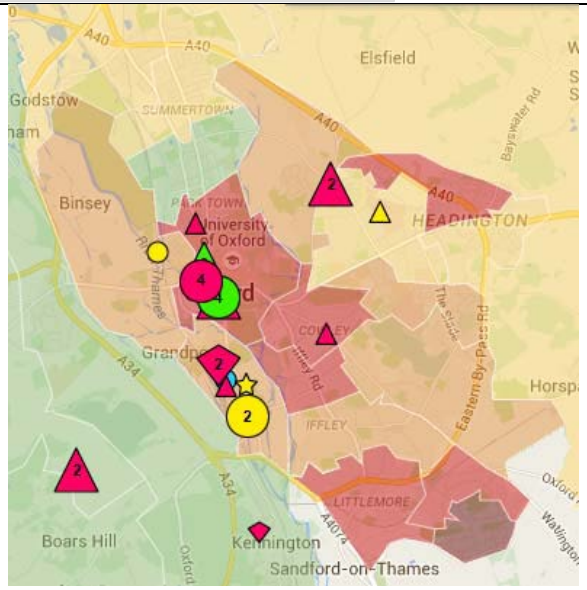
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
		revising its student accommodation strategy.
7. Health General health	More than 80% of Oxford's resident say that they are in good or very good health, higher than the UK average. Oxford is also above average in most indicators of general health. Summertown has the lowest level of health deprivation and Greater Leys the highest, as shown in the figure.  	Nationally, people are living longer and life expectancy at birth in Oxford is increasing in line with the national average.
	Oxford's adults are generally more active, less likely to be overweight, and less likely to smoke than the national average. The mental health of Oxfordshire	Nationally, obesity rates are increasing over time.

Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	residents is similar to that in the UK as a whole, but referrals to mental health services are increasing.	
Housing and health	In 2011, 38.5% of people in Oxford lived in households with more than one person per bedroom, and 12.4% of people lived in fuel poverty, higher than the national average. Homelessness is associated with poor health. The number of homeless people in Oxford has risen sharply: rough sleeper counts, which are known to underestimate the actual number of homeless people, rose from 19 in 2013/14 to 61 in 2017.	On current trends, overcrowding and homelessness are likely to increase in Oxford.
8. Poverty, social exclusion, crime and inequality Deprivation and wellbeing	Overall, Oxford ranks in the middle of national deprivation figures. However, as shown by the figure, this average ranking conceals large variations across the city. Ten of Oxford's 83 small areas are within the 20% most deprived in England, whilst 17 are in the 20% least deprived. The most deprived areas are Northfield Brook and Rose Hill and Iffley. Life satisfaction (wellbeing) scores are similar to those of	Blackbird Leys, Northfield Brook, and Barton and Sandhills have consistently scored poorly on indices of deprivation, particularly in relation to income (particularly child poverty) and educational attainment. The new Barton Park development may change this.

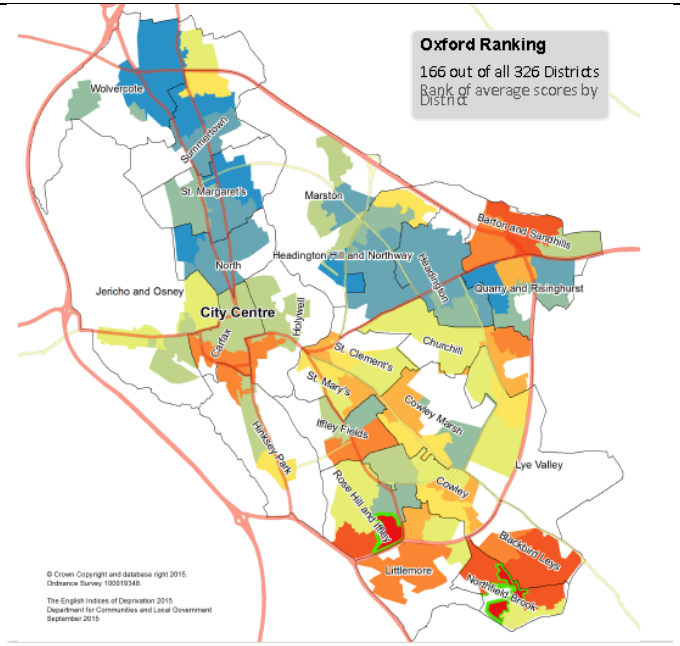


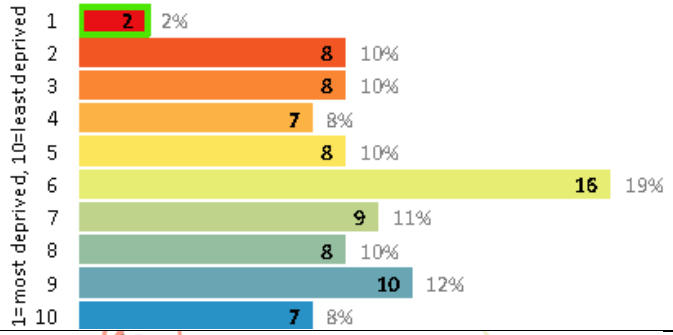
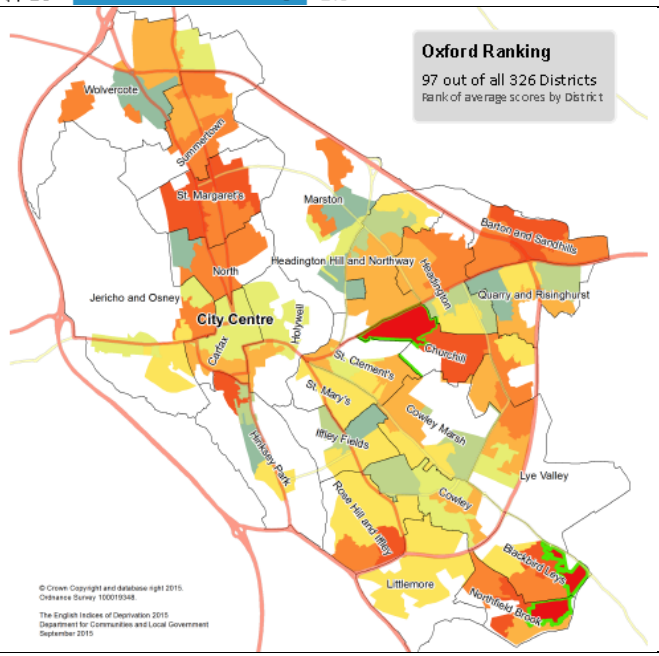
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	deprivation. 	
	Housing and services deprivation is high across most of the city, reflecting the disparity between income and house prices. The figure shows spatial distribution of barriers to housing and services. 	
Crime	Crime levels in Oxford are relatively high. Theft (bicycle theft and theft from person) and possession of weapons in Oxford is significantly higher than the national average. Areas in the most 10% most deprived areas in England in relation to crime include Carfax/Holywell, Hinksey Park, Rose Hill and Iffley, St.	

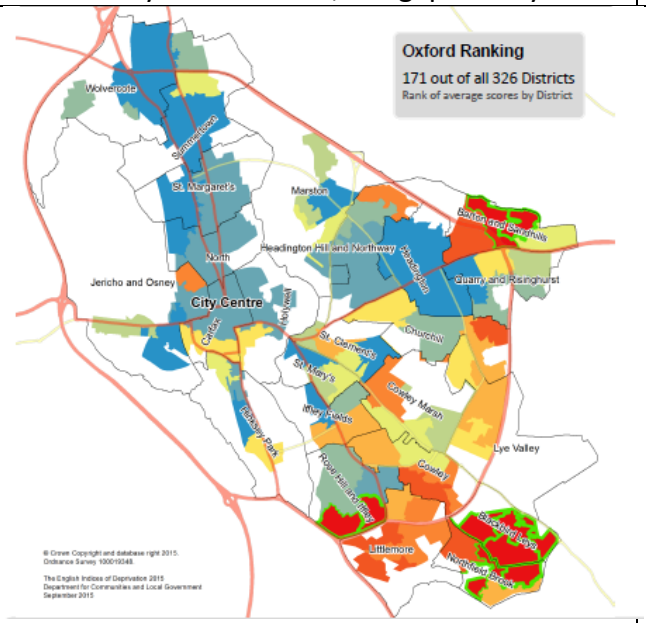
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	Clement's and St. Mary's. More than 90% of Oxford residents feel safe in their local areas and the city centre during the day. At night, 69% feel safe in their local areas and 55% in the city centre.	
Social cohesion	Almost three-quarters of Oxford residents feel that people from ethnic backgrounds get on well together in their neighbourhood. People in the south east of Oxford are the least likely to say this.	Oxford's population is likely to continue to grow and become more diverse.
Deprivation and health	Average life expectancy in Oxford is similar to the national average, but men in the least deprived areas of Oxford have a life expectancy 8.8 years longer than those in the most deprived parts of the city. For females, the gap is 3.7 years.	
9. Education, skills and employability/ training	Oxford is, in general, a well-educated city. In 2016, 61% of Oxford's population had a degree, compared to an England average of 38%. However, GCSE attainment overall is poorer than the England average, with 22% of people aged 16 or over having no qualifications or fewer than 5 GCSEs at C or above. Education and skills deprivation, shown in the figure, is concentrated in the east and south-east of the city. 	Oxford has an increasingly polarised labour market with many high-wage, high-skill and low-wage, low-skill jobs, but fewer jobs at intermediary level. Growth is most likely in education, bioscience, health care and retail. These jobs may not be accessible to local people unless the skills and training gap is addressed. There is also an increasing divide to those who have access to good quality housing and those who do not: this has knock-on effects for those wishing to access jobs.
10. Quality of essential	The table below lists show many services and facilities are available in each of the Oxford postcodes.	Over time, GP practices are tending to combine or co-

Table 4.6 Summary of scoping report information

Topic	Current situation	Likely future without the plan
services and facilities	<table><tr><td></td><td colspan="2">**OX1**</td><td colspan="2">**OX2**</td><td colspan="2">**OX3**</td><td colspan="2">**OX4**</td></tr><tr><td>Population</td><td colspan="2">17730</td><td colspan="2">31201</td><td colspan="2">39060</td><td colspan="2">63915</td></tr><tr><td>**Facility/service**</td><td>Total</td><td>People/ facility</td><td>Total</td><td>People/ facility</td><td>Total</td><td>People/ facility</td><td>Total</td><td>People/ facility</td></tr><tr><td>GP practice</td><td>6</td><td>2955</td><td>5</td><td>6240</td><td>7</td><td>5580</td><td>8</td><td>7989</td></tr><tr><td>Dental practice</td><td>5</td><td>3546</td><td>2</td><td>15601</td><td>10</td><td>3906</td><td>9</td><td>7102</td></tr><tr><td>Pharmacy</td><td>3</td><td>5910</td><td>7</td><td>4457</td><td>8</td><td>4883</td><td>16</td><td>3995</td></tr><tr><td>Primary school</td><td>2</td><td>8865</td><td>7</td><td>4457</td><td>9</td><td>4340</td><td>14</td><td>4565</td></tr><tr><td>Secondary school</td><td>0</td><td></td><td>2</td><td></td><td>1</td><td></td><td>2</td><td></td></tr><tr><td>Community Centre</td><td>2</td><td>8865</td><td>5</td><td>6240</td><td>8</td><td>4883</td><td>13</td><td>4917</td></tr><tr><td>Leisure centre</td><td>2</td><td></td><td>1</td><td></td><td>1</td><td></td><td>1</td><td></td></tr><tr><td>Children’s centre</td><td>1</td><td>17730</td><td>2</td><td>15601</td><td>3</td><td>13020</td><td>4</td><td>15979</td></tr><tr><td>Pub</td><td>49</td><td>362</td><td>27</td><td>1156</td><td>22</td><td>1775</td><td>46</td><td>1389</td></tr><tr><td>Post office</td><td>2</td><td>8865</td><td>5</td><td>6240</td><td>5</td><td>7812</td><td>6</td><td>10653</td></tr></table>	locate to serve wider areas. Oxfordshire is providing new schools, all of which will be academies or free schools in line with government policy. The City Council is investing in its community centres and leisure centres. Children’s centres throughout Oxfordshire have been closing as a result of funding cuts. Nationally, pubs are closing rapidly. The Post Office has started to move away from providing services in their own premises and towards co-locating services within shops or other premises.
11. Employment and economy Employment	Oxford has a high proportion of students and young people. Oxford’s population increased by 12% between 2001 and 2011, to 151,900. The proportion of economically active residents is comparable to other areas. The contribution of Oxford’s workforce to the national economy (GVA per worker) is ranked 7th of 55 cities in England for gross value added (£58,150). A high proportion (61%) of the workforce is employed in managerial, professional and associate professional jobs; this is much higher than England as a whole. Employment is dominated by the public sector and in particular education and health (48%). Oxford has seen a strong growth in private sector jobs over the past decade. This emphasizes the importance of the ‘knowledge sector’, with about two-thirds of the workforce working within this sector.	Oxford’s population is forecast to rise to 186,000 by 2031, with another 24,300 new jobs in that period. The growth is expected to be in university-related education, bioscience, healthcare and retail. Public sector jobs are particularly vulnerable in times of austerity.

Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
Unemploy-ment	Unemployment in Oxford has fallen from about 5,000 (6%) in 2012 to about 3,000 (3.2%) in early 2018. Unemployment in Oxford is much lower than the English average. About one third of those unemployed claimed Job Seekers Allowance. Pockets of unemployment coincide with the most deprived areas of the city. One of the impacts of the recession in the UK has been to further exacerbate existing regional and local disparities, with areas such as Oxford suffering less than areas that were already struggling before the recession.	
12. Retail, district centres and city centre	In early 2016, 3-4% of units in the city centre were vacant, and 6-7% in the district centres, lower than the national average is 10%. This will have changed with the opening of the Westgate Centre in late 2017. Oxford has fewer jobs in wholesale and retail than the UK average: 10% compared to 16%; and about the same proportion of jobs in accommodation at food services as the UK average, at about 7%.	The continued growth of Internet sales and out of town shopping may affect city centre shopping.
Retail units	Although government has allowed the conversion of some retail units to residential accommodation since 2014, this has not significantly affected Oxford's frontages. Oxford currently has a target of at least 75% of city centre primary shopping frontage, 50% of city centre secondary frontage and 65% of district shopping frontages being retail units: these targets are exceeded everywhere other than on the Cowley Road which has a high proportion of food and drink premises.	The City Council intends to bring forward developments in George Street.

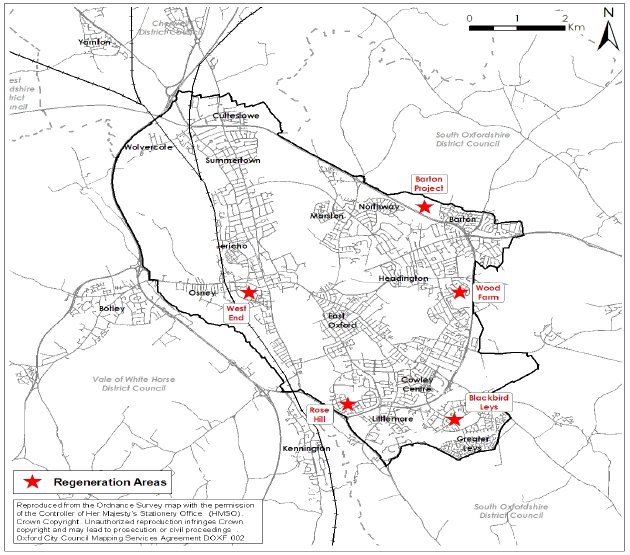
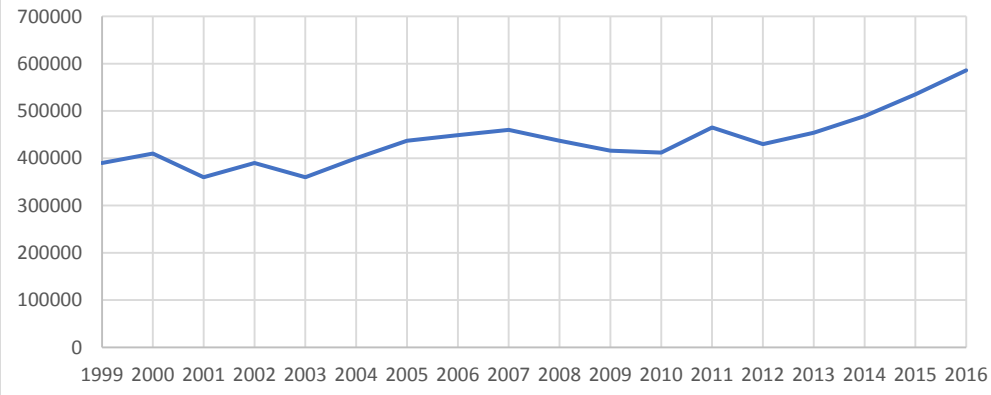
Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
13. Regeneration and economic revival	Oxford currently has regeneration areas in the West End, Barton, Blackbird Leys, Northway, Rose Hill and Wood Farm. 	Key planned projects are: • West End: homes and jobs at Oxpens, and redevelopment of the Oxford railway station (see the SPD for station and Oxpens) • Barton and Northway: 800 new homes, community facilities, access improvements (ongoing) • Blackbird Leys: redevelopment of the district centre, general physical redevelopment and social improvements (ongoing) • Wood Farm: improvements to Foresters tower block (ongoing)
14. Sustainable tourism Number of visitors	The number of staying visits by overseas visitors in Oxford has steadily risen, from 390,000/year in 1999 to 586,000 in 2016. Oxford is the 7th most visited city in the UK. More than half of visitors come from western Europe.	Tourist numbers have risen consistently for the past 20 years, as has spending by tourists. Oxford has consistently been between the 6th and the 8th most visited city in the UK. These trends are expected to continue in the future. It also seems likely that Oxford will continue to be an

Table 4.6 Summary of scoping report information		
Topic	Current situation	Likely future without the plan
	 In terms of domestic visits, in 2012-14 on average there were 5.6 million day visits/year and a total of 6.2 million visits/year, with a total expenditure of £310 million.	attractive destination for hotel operators.
Tourism jobs	A 2014 study found that almost 10,000 full-time equivalent jobs (12.7% of the total workforce) were supported by tourism spending in Oxford.	
Tourism attractions	The Ashmolean Museum, Museum of Natural History, Pitt Rivers Museum and Museum of the History of Science all rank in the top 20 most visited free attractions in the South East.	

4.3 Task A3: Identifying key sustainability issues and problems

The SEA Directive requires a description of "Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC" (Annex Id)

The policy context of Task A1 and sustainability context of Task A2 identified a range of issues and problems that could inform and affect the development of the Oxford Local Plan 2036. Table 4.7 summarises these.

Table 4.7 Sustainability problems and issues in Oxford

Topic	Current situation	Likely future without plan	Sustainability problems and issues
1. Water Flooding			4500 homes are currently at flood risk, decreasing to about 1800 with the flood alleviation channel. Increased likelihood of flooding with climate change. Increased pressure to locate development in areas of higher flood risk.
Water resources			Oxford is in an area of serious water stress. This will be exacerbated with increased demand for water from a growing population.
Water quality			Water quality in the Thames catchment is mostly moderate. Run-off from increased development could worsen this.
2. Green spaces Green Belt			Oxford has a wide range of green spaces which are generally of good quality. However as Oxford's population increases there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. Some green spaces may be needed to provide new homes.
Nature conser-vation areas			
Biodiversity			Biodiversity is plummeting worldwide.
Landscape value of green spaces			
Sports/recreation, parks, allotments			Green spaces will need to respond to climate change, providing long term flood protection and adaptable habitats.
3. Design, landscape and townscape, and the historic environment			Oxford has a high quality landscape and historic environment. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape and townscape.
4. Transport Commuting patterns			Oxford has much higher levels of cycling and public transport use than elsewhere, but congestion levels are high and growing. With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Housing development must be delivered in locations that allow sustainable travel choices, and barriers to walking and cycling need to be overcome.
Traffic levels and congestion			
5. Air quality			All of Oxford is an Air Quality Management Area for NO_2, and there

Table 4.7 Sustainability problems and issues in Oxford			
Topic	**Current situation**	**Likely future without plan**	**Sustainability problems and issues**
			are air quality 'hot spots' at many major road junctions. Most of the city centre air pollution comes from buses. Tackling congestion, for example by reducing journeys to and within Oxford by motorised traffic, and greater use of low and zero emission vehicles, would help improve air quality.
6. Resources Soil and contamination			Soil quality, development density and protection of undeveloped land have been good to date. Higher costs associated with dealing with any remaining contaminated sites could increase pressure to develop greenfield sites.
Previously developed land and density			Increased housing pressure means that there will be more pressure on undeveloped land. Housing densities are likely to grow further.
Energy			The attractiveness of renewable energy technologies is likely to grow as costs fall.
Waste			Although waste levels per household are not predicted to grow, the total amount of waste will increase as the number of households increases.
6. Housing Affordability and affordable housing			House prices in Oxford are already very high, and likely to rise further with increasing demand. Housing to rent on the open market is also unaffordable to a significant proportion of people. This affects employers' ability to attract and retain workers.
Needs and supply			In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its housing need due to the constrained nature of Oxford. Oxford only has the capacity to accommodate around 8,500 dwellings: the rest will be met outside the city. This will affect commuting flows into Oxford. Without further large development sites being identified, the number of small infill sites is likely to increase, and could increase pressure on the existing infrastructure.
Types and sizes			High house prices in Oxford have led to a reduction in home ownership and a sharp increase in the proportion of private renting, including in Houses in Multiple Occupation (HMOs). This trend is likely to increase with further population growth. Provision of family-sized homes is challenging: with high land values and competition from HMOs, developers seek to maximise the number of units on each site.
Students and student accommodation			Oxford University is meeting the council's target on students living outside of purpose-built student accommodation, but Oxford Brookes University is not: this is being worked on. Adequate provision of student accommodation can help free up properties for other people, and encourage vibrancy in communities.

Table 4.7 Sustainability problems and issues in Oxford			
Topic	**Current situation**	**Likely future without plan**	**Sustainability problems and issues**
7. Health General health			The health of Oxford's residents is generally good, but there is great variation: for instance, men in wealthier parts of the city live more than 8 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Oxford residents' higher-than-average levels of activity and healthy weight need to be maintained and increased. The Local Plan can help to address wellbeing and mental health by improving housing quality, access to open spaces and building communities.
Housing and health			
8. Poverty, social exclusion, crime and inequality Deprivation and wellbeing			There are sharp inequalities across the city in terms of opportunities, wellbeing and health. Action needs to be taken to address these inequalities to enable all parts of Oxford's communities to experience a good quality of life. Oxford's population is becoming increasingly diverse. Crime levels in Oxford are slightly higher than in similar areas, and perceptions of safety after dark are much lower than in daytime.
Crime			
Social cohesion			
9. Education, skills and employability/ training			Oxford's population overall is highly skilled, but 22% of people of working age have low or no qualifications. This disparity is strongest in the most deprived areas of the city. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Skills mismatches increase in-commuting, exacerbating congestion problems. Employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people.
10. Quality of essential services and facilities			Availability of services and facilities plays a key role in quality of life. With an increase in population, it will become even more important to protect and enhance these facilities, and ensure that they are easy to access by walking, cycling and public transport. Opportunities should be sought for co-location of facilities.
11. Employment and economy Employment			Oxford has a very strong economy, with high employment, low unemployment and high Gross Value Added. The Oxfordshire Housing and Growth Deal, and the Oxford - Milton Keynes – Cambridge 'knowledge arc' will further strengthen this. It is unlikely that significant new employment sites will be identified in Oxford: the focus is on redevelopment and renewal of existing sites. Ensuring the right balance of employment and housing growth is fundamental to ensuring sustainable growth.
Unemployment			
12. Retail, district centres and city centre			Retail in Oxford has been consistently strong, and has been strengthened with the opening of the Westgate Centre. The city and district centres will need to continue to have a wide range of uses and an attractive public realm to ensure long dwell times and attract people way from online shopping.
13. Regeneration			The diverse nature of Oxford's economic base has helped the city

Table 4.7 Sustainability problems and issues in Oxford			
Topic	**Current situation**	**Likely future without plan**	**Sustainability problems and issues**
and economic revival			to be resilient in the face of recession, but Oxford's overall prosperity masks localized areas of deprivation. There are plans for improving the existing areas of regeneration in the city. Physical regeneration interventions need to be supplemented with social, economic and environmental changes.
14. Sustainable tourism Number of visitors			Tourist numbers to Oxford are high and growing. This has implications for congestion and air quality. The quality of the visitor experience will become more important as competition between destinations increases. Hotel operators are in competition for limited sites.
Tourism jobs			
Tourism attractions			

Problems at areas of particular environmental importance

The SEA Directive requires an analysis of existing problems at areas of particular environmental importance, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). SPAs and SACs are internationally important nature conservation sites designated for, respectively, birds and habitats/species. They are discussed further in the Habitats Regulations Assessment (see Section 3.5).

There are no SPAs in or near Oxford, but there are three SACs within 20km of Oxford:

Oxford Meadows SAC is a 267ha site which lies within the city boundary. It is designated because of its lowland hay meadow and creeping marshwort *Apium repens*. In December 2015, the last year of analysis by Natural England, it had excellent overall ('global') value for its hay meadow and creeping marshwort. However it is highly threatened by human induced changes in hydraulic conditions, pollution to surface water and invasive non-native species.

Cothill Fen SAC is a 43ha site located 7km from the city boundary. It is designated for its lowland valley mire, which contains one of the largest surviving examples of alkaline fen vegetation in central England. In 2015 the alkaline fens were of good overall value, and the alluvial forests were of significant global value. It is highly threatened by pollution to groundwater and human-induced change in hydraulic conditions.

Little Wittenham SAC is a 69ha site located 19km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In 2015 it was of good overall value, but it is highly threatened by non-native invasive species.

Oxford also has several Sites of Special Scientific Importance (SSSIs). Their condition is shown at Table 4.8 and Figure 4.4. The information on SSSI condition is normally 5-10 years old, so their condition may have changed since it was assessed.

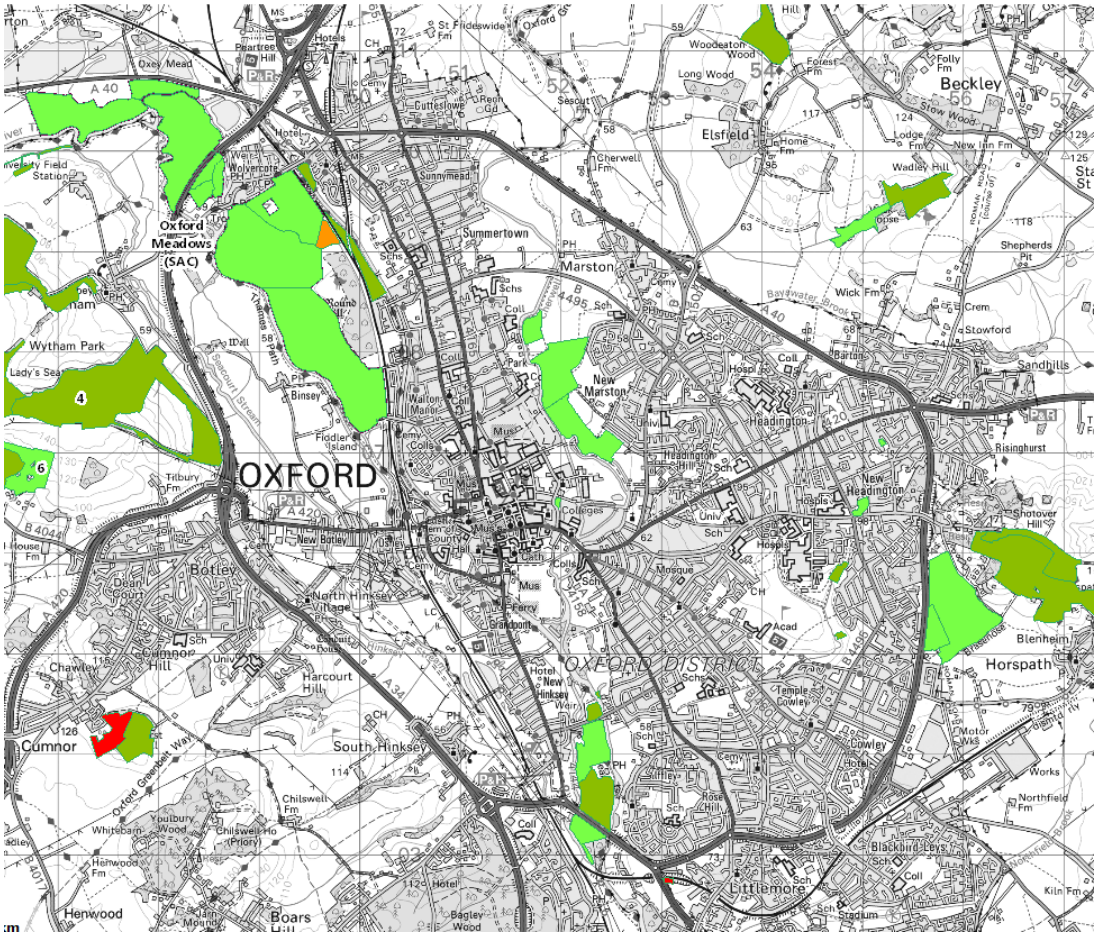


Figure 4.4 Condition of SSSIs in and near Oxford

Table 4.8 SSSIs in Oxford		
Site of Special Scientific Interest	**Size (ha)**	**Condition**
Cassington Meadows	6.9	Favourable
Hook Meadow and the Trap Grounds	11.3	Unfavourable, Unfavourable Recovering
Iffley Meadows	36.1	Favourable, Unfavourable Recovering
Littlemore Railway Cutting	0.5	Unfavourable Declining
Lye Valley	2.3	Unfavourable Recovering
Magdalen Grove	0.4	Favourable
Magdalen Quarry	0.4	Favourable
New Marston Meadows	44.7	Favourable
Pixey and Yarnton Mead	86.4	Favourable
Port Meadow with Wolvercote Common and Green	167.1	Favourable, Unfavourable Recovering
Rock Edge	1.7	Favourable
Wolvercote Meadows	7.1	Favourable

4.4 Task A4: Developing the SA framework

The Sustainability Appraisal (SA) Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. Development of the Local Plan 2036 involved two types of decisions: on policies (general directions for the plan) and on sites (specific locations for development). Assessing the impacts of policies is quite different from assessing the impacts of sites, and two different appraisal frameworks have been used.

SA framework for plan policies

The SA Framework of Table 4.9 consists of SA objectives and decision-making criteria.

The **SA objectives** provide a method by which to test whether the Local Plan will yield the best possible outcomes in terms of sustainability. Essentially they are used to test the sustainability of the plan – its environmental, social and economic effects. The SA objectives therefore cover a full cross-section of sustainability issues.

The **decision-making criteria** consist of a series of questions which help expand the focus of the SA Objectives. The questions are used to ensure that all the issues are considered as part of the assessment process and to address any ambiguities that may arise. They are not considered as a definitive list when conducting the SA.

The following colour coding system was used to assess the impacts of each of the strategies. The success of the Local Plan 2036 in meeting the SA objectives will be monitored through a series of **indicators** that are shown at Chapter 9.

Very positive	++	Negative	-	No direct link	
Positive	+	Very negative	--	Depends on implementation	I
Neutral	0	Unclear	?		

Table 4.9 Sustainability appraisal (SA) framework

SA topic	Sustainability objective	Decision-making criteria – will the option/proposal help to…
1. Flooding, water	To reduce the risk of flooding and the resulting detriment to the public well-being, the economy and the environment	Sustainably manage water run-off, ensure that the risk of flooding is not increased (either on site or downstream) and where possible reduce flood risk
2. Vibrant communities	To encourage urban renaissance by improving efficiency in land-use, design and layout and to create and sustain vibrant communities	Met the day to day needs of residents near to where they live Respect, maintain and strengthen local distinctiveness and sense of place, and promote high quality urban design
3. Housing	To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home	Deliver affordable housing to meet local needs Provide a mix of dwelling sizes and types to support the local housing market Meet the needs of specific groups (e.g. elderly, disabled, young, families, etc.) Provide housing that is designed and constructed sustainably Provide housing that is adaptable to meet changing family

Table 4.9 Sustainability appraisal (SA) framework		
SA topic	**Sustainability objective**	**Decision-making criteria – will the option/proposal help to…**
		needs and the changing climate
4. Human health	To improve the health and wellbeing of the population and reduce inequalities in health	Provide accessible and appropriate healthcare services and facilities for all residents Provide opportunities to gain access to locally-produced fresh food Improve Health ranking on the indices of multiple deprivation
5. Poverty, social exclusion, crime, inequality	To reduce poverty and social exclusion; reduce crime and the fear of crime	Minimise opportunities for criminal and anti-social behaviour and the fear of crime Reduce social exclusion and reduce the number of wards in the most deprived 20% Reduce disparities in wellbeing across Oxford
6. Education	To raise the educational attainment and develop the opportunities for everyone to acquire the skills needed to find and remain in work	Provide suitable education for those who require it Facilitate skills and education enhancement Reduce disparities in education
7. Essential services and facilities	To provide accessible essential services and facilities	Increase the provision of essential services and facilities
8. Green spaces, open air sports and leisure	To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all	Provide an appropriate range of formal and informal sports and recreation facilities that are accessible to all Provide a range of cultural, leisure and community facilities that are accessible by all
9. Biodiversity	To conserve and enhance Oxford's biodiversity	Protect and enhance internationally, nationally and locally designated habitats Protect and enhance priority habitats, and the habitat of priority species Achieve a net gain in biodiversity Enhance biodiversity through the restoration and creation of well-connected and multifunctional green infrastructure
10. Urban design and heritage	To protect and enhance the historic environment and heritage assets	Assess, record and plan archaeological features Preserve and enhance buildings and structures of architectural or historic interest Preserve and enhance the setting of cultural heritage assets Support access to, interpretation and understanding of the historic environment Protect and enhance important views into and out of the city Protect and enhance the setting of Oxford
11. Transport, air	To reduce traffic congestion and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/lorry	Actively encourage 'smarter choices' including public transport, cycling and walking Provide appropriate travel choices for all residents including the needs of specific groups Improve air quality
12. Water quality, water	To maintain and improve water quality; and manage	Protect groundwater, especially in the most sensitive areas (i.e. source protection zones)

Table 4.9 Sustainability appraisal (SA) framework		
SA topic	**Sustainability objective**	**Decision-making criteria – will the option/proposal help to…**
quantity and soil	water resources	Maintain and where possible improve water quality Minimise water consumption and support sustainable levels of water abstraction Use land efficiently and minimise the loss of best and most versatile agricultural land
13. Efficient use of resources (including energy, waste)	To increase energy and resource efficiency (including minimising waste) and renewable energy, with the aim of mitigating climate change	Reduce energy consumption from non-renewable resources Generate energy from low or zero carbon sources Minimise carbon and other greenhouse gas emissions Increase supply of renewable and low-carbon energy Encourage recycling of household waste Encourage recycling of materials and minimise consumption of resources during construction
14. Economy and employment	To achieve sustainable economic growth (including the development and expansion of a diverse and knowledge-based economy)	Provide accessible jobs Ensure an appropriate balance between jobs and housing is delivered Provide a range of jobs and premises Contribute to a low-carbon economy Support the vitality and viability of nearby existing and proposed centres
15. Sustainable tourism	To encourage the development of a buoyant, sustainable tourism sector	Increase the number of jobs in the tourism sector Increase the number of visitors staying overnight Increase the total number of visitors and spend

The Strategic Environmental Assessment Directive requires the Environmental Report to include information on the likely significant effects on a specified list of environmental factors. Table 4.10 shows how the SA objectives relate to these factors.

Table 4.10 Links between SEA Directive issues and SA objectives	
SEA Directive issue	**SA objectives**
Biodiversity	1, 8, 9, 11, 12
Population	1-16
Human health	4, 5, 6, 11, 14
Flora	1, 8, 9, 10, 11
Fauna	1, 8, 9, 10, 11
Soil	1, 8, 9, 11, 12
Water	1, 8, 9, 11, 12
Air	11, 13
Climatic factors	1, 11, 13
Material assets	1, 2, 3, 7, 8, 10, 12, 13
Cultural heritage (incl. architectural and archaeological heritage)	1, 2, 8, 10, 15
Landscape	1, 2, 8, 9, 10

SA framework for sites

More site-specific appraisal criteria were used to assess the impact of proposed development site. The detailed criteria are shown at **Appendix 2**. They are summarized at Table 4.11, which also shows how the site-specific criteria link with the policy appraisal framework of Table 4.9. The same colour coding scheme was used for site appraisal as for policy appraisal.

Table 4.11 Site assessment criteria v. SA objectives

Site assessment criteria	Sustainability objectives														
	1. Flooding	2. Vibrant communities	3. Housing	4. Human health	5. Poverty & soc. exclusion	6. Education	7. Services & facilities	8. Green spaces, sports	9. Biodiversity	10. Urban design & heritage	11. Transport & air	12. Water & soil	13. Efficient use of resources	14. Economy, employment	15. Sustainable tourism
Accessibility: vehicle access							✓				✓				
Accessibility: walking and cycling		✓		✓							✓				
Accessibility: public transport (bus)		✓		✓							✓				
Accessibility: public transport (train)		✓		✓							✓				
Flood risk	✓												✓		
Topography									✓	✓		✓			
Contamination				✓								✓			
Air quality				✓							✓				
Neighbouring land uses				✓						✓					
Distance to nearest primary school		✓	✓		✓	✓	✓				✓				
Distance to nearest GP surgery		✓	✓		✓		✓				✓				
Regeneration		✓			✓									✓	
Land type		✓								✓					
Townscape/Landscape Character		✓						✓		✓					✓
Heritage Assets		✓								✓					✓
Biological/geological importance								✓	✓			✓			
Green Infrastructure	✓	✓		✓				✓	✓	✓	✓	✓			✓

5. Assessing the Local Plan objectives

Task B1. Testing the Local Plan 2036 Objectives against the SA Objectives

The Local Plan 2036 objectives were generated from the sustainability issues identified at the scoping stage and through the issues stage consultation process that took place in summer 2016. Officer level workshops were organised in order to consider the outcomes of both of these aspects and in order to discuss the most appropriate plan objectives for the City. Table 2.1 shows the Local Plan 2036 objectives.

The Local Plan objectives were assessed against the SA objectives to see whether there are any potential conflicts. The assessment is shown at Table 5.1.

Table 5.1 – Local Plan and SA Compatibility Mix

Local Plan spatial objective	SA objective														
	1. Flooding	2. Vibrant communities	3. Housing	4. Human health	5. Poverty & soc. exclusion	6. Education	7. Services & facilities	8. Green spaces, sports	9. Biodiversity	10. Urban design & heritage	11. Transport & air	12. Water & soil	13. Efficient use of resources	14. Economy, employment	15. Sustainable tourism
1. Building on Oxford's economic strengths	x		x	✓		✓		x	x		x			✓	
2. Ensuring prosperity and opportunities for all		✓	x	✓	✓	✓		x	x		x			✓	
3. A pleasant place to live, delivering housing with a mixed and balanced community	✓	✓	✓		✓			x	x		x				
4. Making wise use of our limited resources	✓						✓	✓	✓			✓	✓		
5. Securing a good quality local environment	✓							✓	✓		✓				
6. Protecting and enhancing Oxford's green setting, open spaces and waterways	✓		x	✓				✓	✓					x	✓
7. Enhancing Oxford's unique built environment			x							✓					✓
8. Ensuring efficient movement into and around the city				✓							✓				
9. Providing communities with facilities and services		x					✓	✓	x		✓				
10. Ensuring Oxford is a vibrant and enjoyable city to live in and visit							✓				x		✓		

✓	Generally compatible	x	Potentially incompatible		No significant link / neutral

Table 5.1 shows 18 potentially conflicting interactions. Table 5.2 briefly explains the rationale behind their identification. These possible conflicts have been taken into account in the development of the preferred options for the new Local Plan.

Table 5.2 Possible conflicting interactions between the Local Plan Objectives and the SA Framework

SA Objective	Local Plan Objectives	Rationale
1	1	In order for Oxford to retain its economic significance and its high job offer, it must continue to expand its employment sites which will increase the amount of impermeable land in Oxford which could increase water run-off and the resulting flood risk. This can be managed through sustainable urban design models.
2	9	Delivering the diverse community facilities required to meet Oxford's needs could be problematic in terms of achieving a high degree of land efficiency. Careful consideration in allocating community sites could limit these problems.
3	1, 2, 6, 7	Providing employment opportunities, if not properly managed alongside other considerations, has the potential to be at the expense of adequate housing provision, which would cause continued problems of housing shortages and unaffordability. Preserving Oxford's natural environment will mean less land is available for housing development which will limit Oxford's potential to address its unmet housing need. Protection of the historic environment could also impact on housing provision as the resulting lower or less dense developments may fit best into the surrounding built form.
8	1, 2, 3	Careful consideration will be required in order to ensure the development of housing and employment areas do not adversely affect leisure and recreational opportunities by causing a net loss in green space through development.
9	1, 2, 3, 9	New employment, community, and housing developments will need careful consideration in order to not have a detrimental effect on the biodiversity of Oxford, either through direct or indirect damage to the fauna and flora of the area.
11	1, 2, 3, 10	New housing and employment developments have a strong potential to increase the amount of congestion and resultant air pollution in Oxford. They will require careful management and comprehensive travel plans to mitigate these effects. Promoting the regional role of Oxford entails a strong possibility of increased traffic and air pollution at the outer cordon. This can be largely mitigated through offering alternative modes of travel into Oxford itself, such as through the creation further Park & Ride facilities on arterial routes into the city.
14	6	Protecting Oxford's green setting and character contributes to its brand and make it an attractive city for investment. However it can also damage Oxford's capability to provide additional employment space by limiting available land.

6. Assessing the Local Plan options

Task B2. Developing the Local Plan options

The SEA Directive requires that "the likely significant effects on the environment of implementing the plan… and reasonable alternatives taking into account the objectives and the geographical scope of the plan, are idenfied, described and evaluated" (Article 5.1). It also requires "an outline of the reasons for selecting the alternatives dealt with" (Annex Ih).

There is more than one way of meeting the needs of residents, workers and visitors to Oxford. The options (or alternatives) stage of the SA aims to ensure that the choice of options to consider, and the choice of the preferred options, takes sustainability issues into account. The SA requirements are to

1. identify reasonable options,
2. assess the options' effects using the SA framework from Table 4.9, and
3. explain why the preferred options were chosen.

Sections 6.1 and 6.2 discuss the main strategic policy options for the future growth of Oxford that were considered for the Local Plan 2036. The policy SA framework of Table 4.9 is used to assess the policy options. Section 6.1 mostly summarises and updates the findings of the SA of the preferred options document.

Section 6.3 discusses site allocation options. The sites SA framework of Table 4.11 is used to assess each site. It summarises and updates the findings of the site assessment report.

6.1 Early strategic policy options

Housing v. employment growth

Early discussions about the Local Plan considered whether to focus on new housing, new employment or both. This was due to Oxford's pressure for development, combined with existing environmental and physical constraints. There is insufficient land within Oxford to meet all of Oxford's development needs; the lack of affordable housing within Oxford is a barrier to economic growth; and there is an undersupply of employment premises and land to meet the forecast demand in Oxford to 2036. Given these issues, the right strategy needed to be developed to ensure that the housing supply can be maximised. It is also important to ensure that economic growth is supported so that Oxford can maintain its contribution to the local, regional and national economy. Table 6.1 compares, in broad terms, an employment-focused strategy, a housing-focused strategy or a strategy balancing the needs of both.

A housing-growth focused approach would mean that Oxford's housing need was addressed as far as possible in terms of the available land. It would have a positive impact on housing, and could reduce in-commuting as more new houses were provided in the city. Depending on the scale of this, there could be improvements in air-quality and congestion. Following this approach could result in the loss of employment sites. Without mitigation, employment sites which support Oxford's key strengths could be lost which could be ultimately detrimental to the economy.

Table 6.1 Housing v. employment growth			
SA Objective	Option 1: Strategy to be housing-focused	Option 2: Address housing need and employment growth	Option 3: Strategy to be focused on employment growth
1. Flooding	I	I	I
2. Vibrant communities	++	+	-
3. Housing	++	+	--
4. Human health	0	0	0
5. Poverty & soc. exclusion	I	I	I
6. Education	?	?	?
7. Services and facilities			
8. Green spaces & sport	I	I	I
9. Biodiversity	I	I	I
10. Urban design & heritage	I	I	I
11. Transport & air	+	0	-
12. Water & soil	I	I	I
13. Efficient use of resources	I	I	I
14. Economy & employment	--		
15. Sustainable tourism	0	0	0

An employment-growth focused strategic approach would mean that housing need would be less of a priority than employment growth. As such, it is likely that less housing would be delivered during the plan period. It is also likely that in-commuting would increase as opportunities for employment growth were realised (potentially at the expense of opportunities for housing growth). The concern that lack of housing is a major barrier to economic growth would not be addressed.

Following a strategy which seeks to address both housing need and employment growth, would be likely to address some of the city's housing need and would also continue to bring new sites forward for employment development. Given Oxford's existing levels of in-commuting, it would not necessarily make this situation worse, but neither would matters improve. It is likely that a combination of greenfield land and brownfield land would be needed to meet the development needs under all the options.

The preferred option is therefore to focus on a housing-growth, while ensuring that the loss of important employment sites is resisted. This is most likely to lessen the barriers to economic growth. In-commuting is most likely to lessen in this scenario.

Approaches to housing and employment

Different options for providing housing and employment growth – see Table 6.2 - were then considered.

An early consideration was whether to allocate new employment land or to focus development on existing sites, allowing employment growth through modernisation and intensification of employment uses at existing sites. The Oxford Employment Land Assessment 2016 found that demand for employment land is currently in excess of supply so new land for employment is required during the plan period. Instead, intensification of employment uses on existing employment sites, and some relaxation of key employment sites to allow other types of uses were favoured.

Table 6.2 Strategic options for housing and employment growth	
Topic	**Options**
Housing Growth	1. Further infill development and subdivision, and allow a higher percentage of HMOs across the city
	2. Identify certain areas across the city where higher density housing growth can take place
	3. Allow some existing employment sites to be redeveloped for housing
	4. Allow some greenfield land to be used for housing within the city
	5. Allocate housing land within the Oxford Green Belt (inside the city boundary)
Employment Growth	1. Relax existing protection of key employment sites to promote other uses
	2. Focus new employment development ('smart growth') within the City and District Centres
	3. Allow some greenfield land to be used for employment within the city
	4. Allocate new employment land within the Oxford Green Belt (inside the city boundary)

Note: Preferred options are shaded in blue

In terms of housing, maximising the availability of housing sites was favoured, including some development on the Green Belt and greenfield sites, some housing on employment sites, and some sites with higher density. There is already a high proportion of Housing in of Multiple Occupation (HMOs) in the city, so increasing this was not favoured.

The combinations of options provide a series of strategies in terms of future housing and employment land within Oxford over the plan period.

6.2 Early strategic policy options

The Local Plan 2036 Preferred Options Document contains a wide range of options, which were derived from ideas raised in the Issues Stage public consultation, research studies and suggestions from key stakeholders and City Council officers. The Issues Stage consultation identified the main issues likely to affect the city until 2036:

- Living and housing: where housing will go and what kind of housing is it going to be;
- A strong and mixed economy with a well-trained workforce;
- Making the best use of our limited resources;
- Moving around the city;
- Strong communities, health and wellbeing;
- Network of green and open spaces;
- Design and the historic environment; and
- Centres, shopping, evening entertainment and leisure.

Following an initial SA appraisal and the Issues Stage consultation stage in summer 2016, more detailed options were developed, assessed and refined across the full range of topics to be covered in the Local Plan 2036. The SA was an integral part of the development of the preferred options.

The discussion below is for the key options consulted on in 2017 – those that were felt to be the most controversial and complex - but the SA for the preferred options document assessed all of

the options considered. In some cases, the SA of the preferred options suggested additional options that arose as a result of undertaking the assessment. The options are organised by the sequence in which they appeared in the preferred options document and in the Local Plan.

Economic growth

Protecting employment sites: Category 1 sites (important nationally and regionally, to knowledge economy eg Oxford Science Park, Oxford Business Park, medical research sites like Old Road Campus)

It is widely recognised that the shortage of housing in Oxford is a barrier to economic growth. However, the Oxford Employment Land Assessment (2016) also identifies the need to provide for additional employment development to meet the forecast demand to 2036. Coupled with the huge housing need, this presents a challenge for this Local Plan. Oxford needs to find an approach so that the barriers to economic growth (e.g. shortage of housing) and the drivers of economic growth (e.g. employment growth) can both be addressed appropriately and without detriment to one another.

Option 1 (preferred option): Protect all category 1 sites for employment uses only, allowing modernisation and intensification

Option 2: Allow residential uses to be introduced on category 1 sites, as long as no net loss of employment floorspace

Option 3: Allow a range of other uses to be introduced on category 1 sites, as long as no net loss of employment

Option 4: Do not protect category 1 sites for employment uses

Option 5: Set out site-specific requirements eg uses, types of employment, infrastructure requirements, parking, access, onsite facilities)

Table 6.3 Category 1 employment sites assessment

	Option				
SA Objective	1	2	3	4	5
1. Flooding					
2. Vibrant communities	+	+	I	I	+
3. Housing	0	++	+	++	0
4. Human health	0	I	+	I	0
5. Poverty & soc. exclusion	+	+	+	I	I
6. Education					
7. Services and facilities	0	-	I	I	I
8. Green spaces & sport	0	0	0	0	0
9. Biodiversity	I	I	I	I	I
10. Urban design & heritage					
11. Transport & air	+/-	+	+	+	0
12. Water & soil					
13. Efficient use of resources	I	I	I	I	I
14. Economy & employment	++	+	0	--	+
15. Sustainable tourism					

The influence of Oxford's employment is fundamental not only to the Oxford economy, but also to the wider Oxfordshire, and in some cases national economy. This is difficult to fully capture in sustainability appraisal because the SA objectives relate primarily to the local context, so the options need to be considered in the context of other options in the plan.

Protecting all category sites for employment uses only (Option 1) would provide the strongest policy protection for the highest tier of employment sites. It would ensure that important sites underpinning the knowledge economy and significant employers in Oxford are not lost. It also helps to reduce commuting to work, as well as improving access to local jobs for different sectors of the community. Protecting these sites helps to encourage opportunities for a diverse range of different businesses and employment, but consideration should be given to opportunities to allow some to be developed for housing where strict criteria are met. As employment growth is allowed to continue through modernisation and intensification of sites, other land in the city can be used to address barriers to economic growth (e.g. lack of housing).

Allowing residential uses to be introduced on category 1 sites (Option 2) could erode Oxford's supply of employment land during the plan period; the loss of floorspace is only one aspect of the need to support economic success now and in the future. This option could potentially delivery more housing (albeit not necessarily in the best locations for general housing), but it would significantly reduce opportunities for economic growth of these key businesses and sectors. Provision of staff accommodation on the sites for these key employers could assist in recruitment and retention and be an appropriate ancillary activity where it is clearly and formally linked to the employer.

Not protecting category 1 sites for employment uses (Option 4) would mean that the market would control the future supply of land to meet Oxford's employment demand. There would be no certainty about the city's ability to meet future demand and it would entail the risk that these vital sites would be lost to non-employment uses through redevelopment.

Protecting employment sites: Category 2 sites (important nationally and regionally, not directly part of the knowledge economy but significant employers or sectors in Oxford, primarily B1 and B2 uses, e.g. BMW-Mini, Unipart)

> Option 1 (preferred option): Protect category 2 sites for employment uses only (including modernisation)
>
> Option 2: Protect employment on category 2 sites, but permit residential uses as long as there is no net loss of employment
>
> Option 3: Protect employment on category 2 sites, but permit other uses as long as there is no net loss of employment
>
> Option 4: Do not protect category 2 sites for employment uses

Retaining the Category 2 employment sites for employment-generating uses serves to reduce commuting to work, as well as improving access to local jobs for different sectors of the community. It is important to protect these sites to encourage opportunities for a diverse range of different businesses and employment but consideration should be given to opportunities to allow some to be developed for housing where strict criteria are met. Option 1 is the preferred option for the same reasons as for the Category 1 sites.

Table 6.4 Category 2 employment sites assessment				
	Option			
SA Objective	1	2	3	4
1. Flooding				
2. Vibrant communities	+	+	I	I
3. Housing	0	+	+	+
4. Human health	0	-	+	I
5. Poverty & soc. exclusion	+	0	0	-
6. Education	+	0	0	-
7. Services and facilities	0	-	I	I
8. Green spaces & sport	0	0	0	0
9. Biodiversity	I	I	I	I
10. Urban design & heritage				
11. Transport & air	+	+	+	+
12. Water & soil	0	0	0	0
13. Efficient use of resources	I	I	I	I
14. Economy & employment	++	0	0	--
15. Sustainable tourism	0	0	0	0

Housing growth and types of housing

Overall housing for the plan period

Option 1: Aim to meet Objectively Assessed Housing Need (OAHN) for Oxford within Oxford (1600 dwellings per annum (dpa), 32,000 total by 2031) by significantly boosting housing supply and prioritising housing over other policy aims.

Option 2 (preferred option): Set a target based on capacity, aimed at meeting as much of the OAHN as possible by boosting housing supply with appropriate consideration of other policy aims. Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford.

Option 3: Continue current level of provision (400dpa, 8,000 total). Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford (Business as Usual, current Local Plan 2001-16 policy, and average provision).

The evidence presented in this section has moved forward since its publication in summer 2017. However, given that this was the argument made at the time, and that it is important to tell the "story" of what happened in the Sustainability Appraisal, a decision has been made to maintain this as a historic account of how the decisions were made. This is, in particular, with reference to the 2014 SHMA findings used which were used in the formulation of this option. Since this option was originally assessed in 2017, the findings of the 2018 SHMA roll-forward have been received. The SHMA 2018 roll-forward found that in order to meet Oxford's affordable housing need in full, based on a 50% delivery of affordable housing, would require the delivery of 1,356 dwellings per year. The broad conclusions that can be drawn from the 2018 SHMA roll-forward is that the ultimate housing target remains as it was in the 2014 SHMA (i.e., 1,400 dwellings per year – the mid-point of the range). If this assessment was undertaken now, using the current evidence, while there is a slight discrepancy in the numbers used Option 1 (1,600 dwellings per year (upper

range) as set out in Option 1 vs. 1,400 dwellings per year in 2018), the overall conclusions from the assessment of this option would remain unchanged.

The evidence base, in particular the Housing and Economic Land Availability Assessment (HELAA), and before that the Strategic Housing Land Availability Assessment (SHLAA), indicates that meeting an OAHN (**Option 1**) would be undeliverable. It would involve setting a housing target of around 1600 dwellings per year or 32,000 in total (as identified in the Strategic Housing Market Assessment) over the plan period. Such a target is highly unlikely to be realistic or deliverable without allocating multiple major strategic scale housing sites, of which there are very few if any in Oxford because of the tight city boundary and environmental constraints. Housing completions over the last 10 years have averaged just under-400 dwellings per year, which reflects that the majority of housing in Oxford is delivered on small brownfield sites of less than 10 units, and even at the highest rates of delivery have only reached 821 dwellings per year. Furthermore the capacity calculations are nowhere near 32,000 homes, they are closer to 8,000 homes for the plan period.

Table 6.5 Housing growth assessment

Sustainability Objective	Option		
	1	2	3
1. Flooding	--	I	I
2. Vibrant communities	-	I	I
3. Housing	++	+	+
4. Human health	I	+	I
5. Poverty & soc. exclusion	++	I	I
6. Education	I	I	I
7. Services and facilities	-	0	0
8. Green spaces & sport	--	+	+/-
9. Biodiversity	--	+	-
10. Urban design & heritage	-	+	+/-
11. Transport & air	+	I	I
12. Water & soil	-	0	-
13. Efficient use of resources	-	0	0
14. Economy & employment	+/-	+	-
15. Sustainable tourism			

National policy aims to meet OAHN in full; however this is balanced with other sustainability considerations. To proceed with an option for 1,600 dwellings per year would be unrealistic within the environmental constraints and physical capacity of Oxford.

Setting such a high target is also likely to result in a focus on the number of units rather than the quality or whether the homes are meeting needs or for proper place-making in the city (e.g. are they the right size or tenure for local people's needs). Pursuing the full total at all costs is likely to result in a disproportionate amount of 1-2 bed flats, and fewer family homes. This would make it more difficult to deliver mixed and balanced communities, or to meet the identified needs. It would also mean that very few, or potentially no sites, would be available for other uses including supporting uses that are needed alongside housing to create a sustainable city such as employment, retail, community uses.

Current evidence around a capacity-based target **(Option 2**) indicates a capacity of 8,620 homes (HELAA, 2018) and previously in the 20 year period to 2036. The number that was originally assessed was taken from the HELAA (2016), which included optimistic assumptions about some sites. This (HELAA, 2016) needs further testing to consider the sites in more detail to ensure an appropriate housing land supply could be maintained through the plan period.

It may be possible that the sites and capacity identified in the HELAA can be further boosted through various policy adjustments, which are being explored through the local plan review, such as increasing densities, and reviewing Green Belt and the protection of open spaces. The target is therefore likely to be adjusted and refined as further evidence emerges and to reflect policy decisions in other elements of this emerging plan.

This option also takes into account the on-going work with adjoining authorities within the strategic housing market area, to positively address needs that cannot be met in Oxford. At the time of the options analysis, this was based on a working assumption that around 15,000 homes need to be met outside of Oxford by 2031, agreed by Oxfordshire Growth Board (September 2016). Further work has subsequently been undertaken to understand what this need would look like through to 2036. The more detailed assessment of sites and capacity through the local plan process has helped to refine what the true unmet need figure is that needs to be met outside of Oxford.

Continuing the current level of provision (**Option 3**) is similar to the average level of completions in recent years. The evidence at the time about capacity for the plan period indicated that this level of provision is likely to be deliverable. To be compliant with the objectives of national policy, all policy options should be explored to see if housing land supply could be boosted further to meet a greater proportion of Oxford's needs in a sustainable manner, for example increasing density, release of greenfield sites, and Green Belt sites. Other policy options in this Preferred Options document address this point

It was therefore proposed to continue with a capacity-based approach to planning for homes in Oxford, which sets a target but which should be seen as a minimum to plan for but that can be exceeded in the event that windfall opportunities arise to deliver additional homes in Oxford, for example if a major landowner changes their intentions for a site. With this preferred approach, there is always going to be a proportion of housing needs that cannot be met within Oxford. The City Council has worked in partnership with the other Oxfordshire authorities through the Oxfordshire Growth Board to address its unmet housing needs.

Level of affordable housing requirement and priority types of affordable housing

These options consider two aspects of affordable housing provision: how much affordable housing the plan is seeking to deliver as a proportion of total homes secured from developer contributions; and which type of affordable housing is the priority i.e. whose housing needs are the focus of the policy.

> Option 1 (preferred option): Continue with current approach to prioritise delivery of affordable housing, requiring a proportion of affordable housing to be as high as viability will allow. Continue with current approach to significantly prioritise social rent over intermediate housing ("business as usual" is currently 50% affordable housing requirements and an 80/20 split in favour of social rented over intermediate housing).

Option 2: Reduce the overall proportion of affordable housing required from 50%, which could include differential rates depending on the size of the development.

Option 3: Provide a greater focus than previously on intermediate housing by adjusting the existing 80/20 split. Intermediate housing might include shared ownership, starter homes or affordable homes to buy or rent for key workers.

Option 4: Consider a reduced affordable housing percentage if the affordable dwellings were of a size in greatest need in Oxford (i.e. 2+ bedrooms or 3/4 + bedspaces).

Given the assessed need for affordable housing, the City Council will continue to seek to maximise delivery of affordable homes. Viability testing will be required to help define and support the level of affordable housing sought through the policies.

Table 6.6 Affordable housing assessment

	Option			
SA Objective	1	2	3	4
1. Flooding				
2. Vibrant communities	+	-	++	+
3. Housing	++	-	+/-	+/-
4. Human health	++	+	+	+
5. Poverty & soc. exclusion	++	+	+	+
6. Education				
7. Services and facilities				
8. Green spaces & sport				
9. Biodiversity				
10. Urban design & heritage				
11. Transport & air				
12. Water & soil				
13. Efficient use of resources				
14. Economy & employment	+	+/-	+	+
15. Sustainable tourism				

The preferred policy response seeks to continue to prioritise the housing needs of those who are least able to access homes on the open market and whose only option is social rent. However the current policy balance of affordable housing (80% social rent to 20% intermediate housing) may not be the appropriate balance to continue because of clear needs from key workers and other sectors, and also wider changes in national policy beyond our control which will affect the successful delivery (and retention) of homes for social rent by the council or registered providers.

The need for affordable housing is so great that delivering affordable housing from developer contributions will not be sufficient alone. Other council-led initiatives will also be required (such as the Housing Company). There will also be a role for key employers to play in addressing needs for their staff, for example by delivering affordable staff housing on development sites.

Wise use of resources

Making use of previously developed land

Because of the shortage of developable land in Oxford, it is important that options consider the best way to use that land.

Option 1: Focus all new development on previously developed land

Option 2: Do not prevent new development on greenfield land

Option 3 (preferred option): Restrict development to previously developed land and greenfield land that has been identified as suitable for allocation.

Table 6.7 Previously developed land assessment

SA Objective	Option 1	Option 2	Option 3
1. Flooding	+	-	I
2. Vibrant communities	+	-	+
3. Housing	-	+	+
4. Human health	I	-	I
5. Poverty & soc. exclusion			
6. Education	-	+	+
7. Services and facilities	-	+	+
8. Green spaces & sport	++	-	I
9. Biodiversity	++	-	-
10. Urban design & heritage	I	-	I
11. Transport & air	+	-	I
12. Water & soil	+	-	I
13. Efficient use of resources	+	-	-
14. Economy & employment	-	+	+
15. Sustainable tourism	+	-	I

Focusing development on previously developed land (**Option 1**) would significantly restrict the amount of land for residential and other key essential services. This approach is also likely to restrict opportunities to expand existing services and facilities or to develop new ones. It would have a positive impact on biodiversity and green spaces and recreational land.

Allowing new development on any greenfield land not protected by other designations such as floodplain (**Option 2**) prioritises the delivery of new development sites for housing and other key essential services over the reuse and intensification of existing sites and the protection of green spaces. This approach would have negative impacts on a number of areas, including biodiversity, climate change, recreational opportunities and historic environment that are critical to the sustainable development within the city. This approach would not comply with the NPPF.

Restricting development to previously development and suitable greenfield sites (**Option 3**) would deliver more residential and key essential services sites than the other policy options. It would support resisting a piecemeal and *ad hoc* approach to development. Depending on its implementation this approach may have a number of positive effects, including social and environmental (e.g. it should be easier for larger sites to deliver net biodiversity gain). It also encourages the redevelopment of underused and vacant sites.

Density and efficient use of land

Option 1 (preferred option): Require that development proposals make the best use of site capacity, bearing in mind that larger-scale proposals will often be suitable

Option 2: Have minimum housing density requirements in allocations

Option 3: Do not include a policy on density and efficient use of land but rely on national planning policy

Table 6.8 Development density assessment

SA Objective	Option 1	2	3
1. Flooding			
2. Vibrant communities	+	+	-
3. Housing	++	++	-
4. Human health			
5. Poverty & soc. exclusion	+	+	-
6. Education			
7. Services and facilities	+	+	-
8. Green spaces & sport			
9. Biodiversity			
10. Urban design & heritage			
11. Transport & air	+	+	-
12. Water & soil			
13. Efficient use of resources	+	+	-
14. Economy & employment	++		-
15. Sustainable tourism			

Requiring development proposals to make the best use of site capacity (**Option 1**) would enable applications to be refused if they do not make efficient use of land. However, it also acknowledges that proposals should make an individual design response to site-specific circumstances and surroundings, and that capacity will be guided by the appropriate use for the site. Generally a greater intensity of development will be expected on sites with good local facilities and public transport accessibility.

Having minimum housing density requirements (**Option 2**) would ensure efficient use is made of land, and maximise the potential of new development to meet needs. However, it does not allow an individual response to surroundings, which should be encouraged to ensure good urban design. In many cases, a density well above that set as a minimum may be suitable, but this may not be explored if policy suggests a suitable density. In other cases, a low-density development on a small site may be the best response to surroundings.

Not including a policy on density (**Option 3**) could allow low-density development to come forward which does not take account of the scarcity of land in Oxford and the need to maximise the use of that land.

Green Belt

Greenfield sites deliver many functions and benefits and are highly valuable, so will generally be protected. However, policy approaches should consider how to identify the greenfield sites with less value that could be suitable for development. This will include Green Belt sites. Sites in the Green Belt have been identified that are of low recreational, biodiversity and flood storage value and which have landowner interest in developing the site. An Oxford Green Belt Study has been

prepared by Land Use Consultants, which assesses the impact that development on these identified Green Belt sites would have on the integrity of the remaining Green Belt.

Option 1 (preferred option): Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study. Do not review the Green Belt boundary or allocate sites where the impact would be 'high'.

Option 2: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'low' impact on the Green Belt, as determined by the Green Belt Study.

Option 3: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'high', 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study.

Option 4: Do not allocate Green Belt sites for housing.

Table 6.9 Green Belt options assessment

SA Objective	Option 1	2	3	4
1. Flooding	I	I	I	I
2. Vibrant communities				
3. Housing	+	+	++	-
4. Human health				
5. Poverty & soc. exclusion				
6. Education				
7. Services and facilities				
8. Green spaces & sport	-	-	--	0
9. Biodiversity	I	I	I	I
10. Urban design & heritage	-	-	--	-
11. Transport & air				
12. Water & soil	-	-	--	0
13. Efficient use of resources				
14. Economy & employment	0	0	0	-
15. Sustainable tourism				

Reviewing the Green Belt and supporting housing that has a low or moderate impact (**Option 1**) would mean allocating 8 sites of about 18 hectares in total where development would have a moderate impact on the integrity of the Green Belt. To put this in context, there is of a total of 1,287 hectares of Green Belt within the city, and the city is 4,560 hectares in total. This option strikes a balance between protecting the integrity of the Green Belt and ensuring that sites come forward to meet development needs in sustainable locations. As well as the Green Belt assessment, all sites would be appraised to ensure they are good locations for development, although generally any site in Oxford is likely to be sustainable. This approach would require Green Belt boundaries to be reviewed and amended. Site allocations policies should also mention any other potentially mitigating measures that could minimise any harmful impact on the Green Belt.

Reviewing the Green Belt and supporting low-impact housing (**Option 2**) would ensure very little harm to the overall integrity of the Green Belt. However, given the need for new housing in Oxford, particularly to support the economy and the functioning of the city, further consideration than this should be given to potential development in the Green Belt. Reviewing the Green Belt and supporting housing that has a low, moderate or high impact (**Option 3**) would significantly harm the overall integrity of the Green Belt in Oxford.

Not allocating Green Belt sites for housing (**Option 4**) would have no negative impact on the overall function of the Green Belt. However, it would mean that sites where there would be only a moderate or low impact on Green Belt, and which otherwise have minimal recreational, biodiversity and flood storage value, would not come forward to help meet Oxford's significant development needs. This would mean more development would need to be outside of the Green Belt, which could be in less sustainable locations. Many Green Belt locations are in all other ways very sustainable locations for new development as they are in well-connected locations on sustainable transport networks and close to existing facilities. This approach would not be consistent with the approach neighbouring Oxfordshire authorities are taking to Oxford's Green Belt in their own Local Plans.

Flood risk zones

Option 1 (preferred option): Include a policy in line with the NPPF that allows only water-compatible uses in flood zone 3b, and application of the sequential test for other developments. Include a policy on reducing or not increasing run-off.

Option 2 (preferred option): Allow development on brownfield sites in flood zone 3b, with very high standards of flood mitigation measures and reduced run-off required.

Option 3: Prevent development in any greenfield site with a 1/100 risk of flooding or greater (with specified exceptions, e.g. car parks, or exceptions for allocated sites)

Option 4: Do not include a policy but rely on guidance in the NPPF and PPG.

Table 6.10 – Flood risk zones options assessment

SA Objective	Option 1	2	3	4
1. Flooding	++	I	++	0
2. Vibrant communities				
3. Housing	I	I	-	-
4. Human health	+	I	+	0
5. Poverty & soc. exclusion				
6. Education	+	I	I	
7. Services and facilities	I	I	I	0
8. Green spaces & sport	0	+	+	0
9. Biodiversity	+	+	+	0
10. Urban design & heritage				
11. Transport & air				
12. Water & soil	++	+	++	0
13. Efficient use of resources	+	+	+	0
14. Economy & employment				
15. Sustainable tourism				

Allowing only water-compatible uses and essential infrastructure in the functional floodplain (**Option 1**) would not increase the risk of flooding elsewhere or result in net loss of floodplain storage. Using the sequential test for other sites would ensure that development is directed towards land in flood zone 1 where possible. It would also enable development to come forward on flood zone 3a sites where the sequential test has been passed because of the huge need for development in Oxford and the lack of availability of sites in other locations.

Allowing some development on brownfield land in the functional floodplain (**Option 2**) would have a neutral or positive effect on water retention and storage. Existing developments may contribute to surface-level run-off. Some brownfield sites, particularly areas of hardstanding, can have a function in flood storage and decreasing flood flow to other areas. Therefore, in most cases the overall footprint of development should not be substantially increased. It will be vital that it is clearly demonstrated that new development would not impede the flow of water, reduce the capacity of the floodplain to store water, create or increase any risk for occupants, or increase the risk of flooding elsewhere. This option encourages efficient use of land and may also allow development close to where people live, helping to sustain vibrant communities. It could enable the delivery of more housing, education or health facilities on sites that are already well served by essential services and facilities. Greater use of brownfield sites for new development is likely to reduce the need to use greenfield sites and this should help to maintain and where possible improve water quality. The preferred option is a combination of Options 1 and 2.

Preventing development on greenfield sites in flood zone 3a (**Option 3**) would have some additional positive effects on minimising risk of flooding as it would be expected that greenfield sites in flood zone 3a act as flood storage areas. Preventing development in these areas will help to ensure they maintain their full function as flood storage areas, which will ensure no increase in flood risk elsewhere. The option adds to protection of greenfield sites and there may be an additional benefit in terms of water quality. However, it could also prevent some sites coming forward that might be used for housing, education or health facilities. In a city such as Oxford, where all development is well located for accessing facilities and sustainable travel modes, and where there is such demand for scarce land, opportunities to find suitable development sites should be maximised.

Not including a policy on flood risk zones (**Option 4**) could lead to the delivery of development that is not sustainably constructed, and that is not adaptable to the changing climate.

Environmental protection

Air quality assessments

Option 1 (preferred option): Require air quality assessments for all major developments or any other development considered to have a significant impact on air quality and the identification of measures to mitigate any impacts

Table 6.11 – Air quality option assessment

SA Objective	Option 1
1. Flooding	
2. Vibrant communities	
3. Housing	+
4. Human health	+
5. Poverty & soc. exclusion	
6. Education	

SA Objective	Option 1
7. Services and facilities	
8. Green spaces & sport	
9. Biodiversity	+
10. Urban design & heritage	
11. Transport & air	++
12. Water & soil	
13. Efficient use of resources	I
14. Economy & employment	
15. Sustainable tourism	

The Planning Practice Guidance sets out the information that may be required in an air quality assessment, making clear that "A*ssessments should be proportional to the nature and scale of development proposed and the level of concern about air quality*". Many Air Quality Assessments currently tend to neglect the contributions of the emissions from energy centres/ combustion systems, and focus on emissions resultant from traffic. The introduction of this policy re-enforces the importance of assessing the emissions of this significant source of air pollution. According to the Air Quality Action Plan for Oxford, commercial, institutional and residential combustion processes are responsible for 17% of the total NO_x emissions of the city.

If the Air Quality Assessment shows a negative impact on air quality then the appropriate cost and level of mitigation should be calculated. This can be done through an air quality damage cost calculation. Damage cost calculations estimate the cost to society of a change in emissions of different pollutants. Damage costs are provided by pollutant, source and location. This is appropriate for small air quality impacts (below £50 million) provided the proposal does not affect areas likely to breach legally binding air quality limits. A full list of damage costs is available (https://www.gov.uk/guidance/air-quality-economic-analysis).

An alternative mitigation approach implemented in London requires development to be 'air quality neutral', meaning the building and transport emissions must be calculated and compared with a benchmark for development. The calculations cover the emissions of NO_x and PM10. The guidance also sets emission limits for boilers and centralised energy plant. This approach could be clearer and easier to calculate.

Biodiversity sites, wildlife corridors. Species protection independent ecological assessment (accounting)

Option 1 (preferred option): Protect a hierarchy of international, national and locally designated sites of importance for biodiversity, including connecting wildlife corridors.

Option 2 (preferred option): Protect other sites with biodiversity interest. The use of a biodiversity calculator will be required to demonstrate net gain for biodiversity. The principle of the 'avoid, mitigate, compensate' hierarchy will be expected, and where damage is unavoidable, offsetting may be considered as long as overall net gain is demonstrated.

Option 3: Protect biodiversity sites of national and regional importance only

Table 6.12 – Biodiversity sites options assessment			
	Option		
SA Objective	1	2	3
1. Flooding	0	I	I
2. Vibrant communities	+	-	-
3. Housing	0	+	+
4. Human health	0	-	-
5. Poverty & soc. exclusion			
6. Education			
7. Services and facilities	0	I	I
8. Green spaces & sport	+	-	--
9. Biodiversity	+	+	-
10. Urban design & heritage	0	+	-
11. Transport & air	+	+	0
12. Water & soil			
13. Efficient use of resources	0	+	-
14. Economy & employment	0	0	+
15. Sustainable tourism			

Sites with international importance (such as the Port Meadow SAC) and national importance (such as sites of special scientific interest, SSSIs) must be protected. However there are also local sites with biodiversity interest (such as Local Wildlife Sites and other sites designated for their local biodiversity interest) that can provide important social and environmental benefits. Protecting these sites (**Option 1**) can also have important network functions in terms of providing connections between larger areas of habitat, supporting biodiversity across the city and should be protected.

Protecting other sites with biodiversity interest, for instance where there are records of protected species (**Option 2**) would give further protection to biodiversity interest.

Protecting biodiversity sites of national and regional importance only (**Option 3**) offers no protection for sites of local biodiversity interest, and there is a risk that these sites could be lost. The preferred option is a combination of Options 1 and 2.

Built environment

Building heights

Option 1: Identify locations suitable for higher buildings

Option 2: Require buildings over a certain height in identified areas

Option 3: Remove all height restrictions in policy

Option 4: Loosen height restrictions in view cones and central area but introduce policy requiring assessment of impacts of heights in those areas

Option 5: Require buildings of a minimum height in all areas

Table 6.13 Building heights options assessment					
	Option				
SA Objective	1	2	3	4	5
1. Flooding					
2. Vibrant communities					
3. Housing	+	++	++	I	I
4. Human health					
5. Poverty & soc. exclusion					
6. Education					
7. Services and facilities					
8. Green spaces & sport					
9. Biodiversity					
10. Urban design & heritage	I	I	-	I	I
11. Transport & air					
12. Water & soil					
13. Efficient use of resources					
14. Economy & employment	I	I	++	I	I
15. Sustainable tourism					

As a result of the appraisal process, options 1, 2 and a variation of option 4 were combined. Added to this combined preferred option was a requirement for exceptional design. This was the preferred option.

High buildings, view cones and high building area

Option 1: Continue with the current policies that limit the height of buildings in the view cones area and central 'high buildings area'.

Option 2 (preferred option): Continue to define view cones and a high buildings area but instead of a height limit introduce criteria for assessing the impact of proposals on the skyline (based on the View Cones Study)

Option 3: Do not have a specific policy to protect views of the skyline

Option 4: Review view cones and remove those where views have been lost because of trees etc.

Table 6.14 High buildings and view cones options Assessment				
	Option			
SA Objective	1	2	3	4
1. Flooding				
2. Vibrant communities	I	I	-	I
3. Housing	-	+	++	+
4. Human health				
5. Poverty & soc. exclusion				
6. Education				
7. Services and facilities				
8. Green spaces & sport				
9. Biodiversity				
10. Urban design & heritage	-	I	-	-

SA Objective	Option			
	1	2	3	4
11. Transport & air				
12. Water & soil				
13. Efficient use of resources				
14. Economy & employment	-	+	+	+
15. Sustainable tourism				

Continuing with current policies on building height (**Option 1**) could lead to all buildings being built to the maximum height, without enough regard to what height works best in a particular location, and with the potential consequence of creating a very flat, monotonous and uninteresting roofline, which actually detracts from the skyline that the aim is to protect.

Introducing criteria for assessing the impact of proposals on the skyline (**Option 2**) should ensure that, instead of a blanket approach, full consideration is given to how new development will impact on the skyline. This would allow new taller buildings that make a positive impact on the skyline. It will ensure that efficient use of land is encouraged, but not to the detriment of the unique character of Oxford's urban environment and in particular views of the 'dreaming spires'. A policy requirement for a Visual Impact Assessment, especially for larger developments would help to ensure that effects are understood. The policy will need to refer to issues such as roofplant (e.g. air-conditioning units) and massing. This is the preferred option.

Not having a policy to protect skyline views (**Option 3**) would lead to increased heights in areas where there are currently controls, in the city centre particularly. This option could enable significantly more development in the city centre. However, it could lead to significant harm to the historic environment and views into and out of Oxford, damaging its uniqueness.

Removing view cones where views have been lost, mostly because of trees (**Option 4**), would not allow for management to enhance the views again so that they are not irreparably lost.

6.3 Site allocation options

Box 6.1 shows the Local Plan strategy's spatial approaches.

Box 6.1 Oxford Local Plan 2036 spatial approaches

Allocating new built development and protecting certain built development (through site allocations):

- **Allocating as many sites as possible for housing** where deliverable
- **Protecting existing housing** only allowing redevelopment in exceptional circumstances
- **Allowing new purpose built HMOs** in appropriate locations
- **Allowing new student accommodation** only on allocated sites, existing campuses, in district centres and the city centre
- **Supporting older persons accommodation**
- **Allocating Green Belt sites for housing** (if suitable in other respects) and other important infrastructure that are rated as having a 'moderate' and 'low' (but not 'high') impact on the function of the Green Belt
- **Protecting employment uses** that are important to the knowledge economy or are important nationally and regionally (described as Category 1 sites in the Preferred Options)

- **Allowing the loss of B8 sites** to other B1, B2 and *Sui Generis* that support the local economy
- **Ensuring that uses that attract a lot of people follow the hierarchy of centres**: City centre; Primary District Centre (Cowley centre); District centres; Local centres
- **Ensuring that proposals do not conflict with the Primary and Secondary Shopping Frontages** in City and District Centres in line with Retail and Leisure Study
- **Ensuring that proposals in the amended District Centre boundaries are town centre compatible uses**
- **Resisting the expansion of private language schools**
- **Protecting existing hospital sites** for hospital related uses, allowing some diversification
- **Allowing new primary healthcare facilities** in accessible locations
- **Providing facilities just outside the city centre to the North/South for tourist coach drop off** and pick up, with tourist coach parking provided at Park and Ride sites
- **Allowing water-compatible uses and essential infrastructure in flood zone 3b** (the functional floodplain)
- **Allowing development on brownfield sites in flood zone 3b**, with very high standards of flood mitigation measures and reduced run-off required.
- **Safeguarding land that would be required to deliver the potential expansion of the Cowley branch line** into a passenger railway line and the potential new stations

Protection of sites from development/redevelopment. Some of these sites will be protected by general policies relating to the use of the sites, for example pubs. Some of the larger and more significant sites will also have a more typical site allocations policy relating specifically with that site, and dealing with issues such as potential for improved access and consolidated parking arrangements, shared open spaces and the potential for intensification and diversification to a wider range of uses (though overarching protection policies not typically Site Allocations):

- **Protecting all other (non-Category 1) employment sites** that provide important local services and maintain a diverse employment base (sites other than Category 1 sites that are identified in the Employment Land Assessment)
- **Protecting sites that are identified as part of the Green Infrastructure Network** through the Green Infrastructure Study
- **Protecting the Special Area of Conservation, Sites of Special Scientific Interest, Local Nature Reserve, Local Wildlife Sites, Wildlife Corridors** and other sites with biodiversity interest (those with recorded **protected species**).
- **Protecting playing pitches and allotments** unless criteria are met such as replacement nearby or improvement to nearby facilities or demonstration they are surplus to requirements
- **Protecting pubs**, using a criteria-based approach requiring evidence of diversification to establish a wider customer base; lack of viability with marketing a key component
- **Protecting community facilities**, allowing loss under certain circumstances, such as replacement nearby; or improvement to nearby facilities; or demonstration they are surplus to requirements; or that opportunities have been explored for multi-use
- **Protecting existing state primary and secondary school sites** and support extensions and more intensive uses on site

Potential development sites were identified from the following sources:

- Core Strategy allocated sites
- Sites and Housing allocated sites
- West End AAP identified sites
- Other sites from the previous 2014 Strategic Housing Land Availability Assessment

- Calls for sites inviting landowners to nominate their sites (2014, 2016, 2017, Local Plan)
- Protected Key Employment Sites
- Other employment sites not protected (if greater than 0.25ha)
- Wildlife Corridor and Sites of Local Importance for Nature Conservation designations
- Protected Open Space designations (public open space, open air sports, allotments)
- Sites previously rejected through the Sites and Housing Plan process
- Stakeholder consultation (Unlocking Oxford's Development Potential [Cundell] Report)
- City Council department suggestions (Property/Leisure)
- Commitments (sites with planning permission or Prior Approval for housing, student accommodation)
- Sites refused planning permission or expired but suitable for housing/student accommodation in principle
- Map survey (any other piece of land greater than 0.25ha)

A three-stage process was followed to identify which of these potential sites should be included as proposed site allocation policies in the Local Plan. The Sustainability Appraisal for sites was integrated in to the site assessment process to streamline the procedure, so that a single assessment could be carried out for each site.

Stage 1. All sites underwent a Stage 1 filter process. Sites were rejected for allocation for development if they were:

- a Special Area of Conservation (SAC) or Site of Special Scientific Interest;
- greenfield in flood zone 3b;
- less than 0.25 hectares in area;
- already at an advanced stage in the planning process (i.e. development has commenced).

Stage 2. All sites that had passed the Stage 1 filter process were considered against the SA objectives. The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure. Sites were rejected at this stage if they:

- were considered to be part of Oxford's Green Infrastructure network as determined in the Green Infrastructure Study;
- had no clear access.

Stage 3. All sites that had passed the Stage 2 assessment were considered in terms of deliverability and against the Local Plan Preferred Options strategy. Sites were rejected at this stage if:

- it is extremely unlikely to become available during the plan period (i.e. before 2036);
- the landowner has indicated that they have no intention to develop;
- there is serious conflict with the NPPF/Oxford Local Plan Preferred Options strategy and no mitigation is possible.

Of 516 initial sites, 390 were rejected at stages 1, 2 or 3, leaving 126 sites that were carried forward to the preferred options stage. The detailed site assessments can be found in *Sites Background Paper*. Table 4.11 showed the site appraisal criteria. Table 6.15 shows the appraisal findings for the preferred sites.

Table 6.15 Appraisal of preferred sites

Site number (grey shading = not taken forward)	Site appraisal criteria																
	Vehicle access	Walking & cycling	Bus	Train	Flood risk	Topography	Contamination	Air quality	Neighbouring land uses	Distance to prim. sch.	Distance to GP	Regeneration	Land type	Townscape	Heritage	Biological	Green infrastructure
003	+	-	++	-	--	-	0	-	I	-	+	0	-	0	0	0	0
006	++	+	++	-	0	-	0	-	I	+	+	0	++	I	-	0	0
008	I	+	++	-	--	--	-	-	-	-	-	+	-	0	0	0	0
009	++	+	++	I	0	0	0	-	I	+	+	+	++	0	0	0	0
010	++	+	++	-	0	-	0	-	I	-	+	0	++	0	I	I	0
011	++	+	++	+	--	0	0	-	-	+	+	0	++	I	I	I	0
012	++	+	++	-	0	-	0	-	I	-	-	0	++	0	-	I	0
013	++	+	++	-	--	--	0	-	I	+	-	0	I	I	I	-	0
014	++	++	++	-	0	0	0	-	I	+	+	0	++	I	I	0	0
016	++	+	++	I	-	0	-	-	I	+	+	0	++	0	0	0	0
017	++	+	++	-	0	0	0	-	I	+	+	0	++	0	0	0	0
018	++	++	++	-	0	0	0	-	I	-	+	0	++	0	0	0	0
020	++	+	++	-	0	0	0	-	-	+	-	0	++	0	0	0	0
021	+	++	++	+	0	0	0	-	I	-	+	0	++	I	-	0	0
022	++	+	++	-	--	0	-	-	I	-	-	0	++	0	0	0	0
023	+	+	++	-	0	-	0	-	I	+	-	0	++	I	0	0	0
024	++	+	++	-	0	-	0	-	I	+	-	0	++	I	0	0	0
025	+	+	++	I	0	-	0	-	-	-	-	0	-	I	0	0	0
026	+	+	++	-	0	0	0	-	I	-	-	0	-	0	0	0	0
027	++	+	++	-	0	0	0	-	0	-	+	0	++	0	I	0	++
028	++	+	++	I	--	0	?	-	0	-	-	0	++	0	0	0	++
029	-	-	++	-	0	-	0	-	-	-	-	0	-	I	0	I	0
031	+	++	++	+	-	I	0	-	I	-	-	0	-	I	I	I	0
032	+	++	++	-	0	-	0	-	0	-	++	0	-	I	-	0	0
033	++	+	++	-	--	0	0	-	0	-	-	0	++	0	0	I	++
034	++	+	++	-	--	-	0	-	0	-	-	0	++	0	0	-	I
038	++	+	++	-	0	-	0	-	-	+	-	0	I	0	0	0	0
039	++	+	++	I	0	0	0	-	-	+	-	0	I	0	0	0	0
040	++	+	++	I	--	0	0	-	I	+	-	+	I	0	0	I	0
042	++	+	++	-	0	0	0	-	I	+	-	0	++	0	0	0	0
043	++	+	++	-	0	0	0	-	0	-	+	0	++	0	0	I	0
044	++	++	++	+	0	0	0	-	0	-	+	0	++	I	-	0	0
045a	++	+	++	-	0	-	0	-	I	-	+	0	++	I	0	0	0
049	+	+	++	+	0	0	0	-	I	-	-	0	-	0	0	0	0
050	++	+	++	I	0	0	0	-	I	-	+	0	++	0	0	0	0
052	+	-	++	I	0	0	?	-	-	-	-	0	I	I	I	I	0
053	++	I	++	-	0	0	0	-	-	-	-	0	-	0	0	0	0
054	++	+	++	-	0	-	0	-	0	-	+	0	I	I	I	0	0
058	++	+	++	I	0	0	0	-	I	+	+	0	++	I	0	0	0
061	++	++	++	-	0	0	0	-	I	+	+	0	++	0	0	0	0
062	++	++	++	+	0	0	0	-	I	-	-	0	++	I	I	0	0
063	++	+	++	-	0	0	0	-	I	-	+	0	I	0	I	I	0
064	+	+	++	-	0	-	0	-	I	-	-	0	-	0	0	I	0
065	+	++	++	+	0	0	0	-	0	+	+	0	++	I	I	0	0
066	++	+	++	+	--	0	0	-	0	+	+	+	++	-	0	0	0
067	++	+	++	-	--	0	0	-	0	-	-	0	I	I	I	I	I
095	++	+	++	-	0	0	0	-	I	+	+	0	++	0	0	0	0
097	+	+	++	-	--	0	?	-	I	-	+	0	++	++	0	I	0
104	I	I	++	-	0	0	?	-	I	+	+	0	-	0	I	0	0
106	++	+	++	+	0	0	-	-	-	+	+	0	++	I	0	0	0

Table 6.15 Appraisal of preferred sites

Site number (grey shading = not taken forward)	Site appraisal criteria																
	Vehicle access	Walking & cycling	Bus	Train	Flood risk	Topography	Contamination	Air quality	Neighbouring land uses	Distance to prim. sch.	Distance to GP	Regeneration	Land type	Townscape	Heritage	Biological	Green infrastructure
111	++	+	++	-	0	0	-	-	0	+	-	0	++	0	I	0	0
112a1	++	+	++	-	0	0	0	-	-	-	-	0	I	++	0	0	0
112b1	+	+	++	-	0	0	0	-	-	-	-	0	-	0	0	0	0
113	+	+	++	-	--	-	0	-	-	-	-	0	-	-	0	0	++
114d	++	+	++	-	0	-	0	-	0	-	-	+	-	I	0	0	0
117	+	++	++	-	0	-	0	-	0	-	-	0	-	I	I	0	0
124	++	+	++	-	0	0	0	-	0	-	++	0	++	0	0	I	0
125	I	I	++	-	0	-	0	-	0	-	++	0	-	0	0	0	0
170	+	+	++	-	0	0	0	-	I	+	+	0	-	0	0	0	0
203	+	+	++	-	0	--	0	-	-	+	-	0	-	I	I	0	0
216	I	I	++	-	0	-	0	-	-	+	-	0	-	0	0	0	0
241	+	+	++	-	0	-	0	-	-	-	-	0	-	I	I	0	0
289	++	+	++	I	0	-	0	-	I	-	-	0	I	0	0	0	0
309	I	+	++	-	0	-	0	-	I	-	+	0	-	0	0	0	0
329	+	+	++	-	0	0	0	-	I	-	+	0	-	0	0	0	0
341	+	+	++	I	0	0	0	-	I	-	+	0	-	0	0	0	0
346	+	+	++	-	0	0	0	-	0	-	++	0	++	I	I	0	0
349	++	+	++	++	--	0	0	-	0	+	-	0	++	-	-	0	0
356	+	++	++	-	0	0	0	-	0	-	+	0	++	0	0	0	0
364	++	+	++	-	--	-	0	-	0	-	-	0	++	I	0	0	0
399	+	+	++	-	0	-	0	-	I	+	-	0	-	I	I	0	0
411	++	++	++	-	0	0	-	-	I	+	+	0	++	0	I	0	0
430	I	+	++	-	0	-	0	-	I	+	-	0	-	I	0	0	0
434	+	+	++	-	0	?	?	-	?	?	?	0	-	?	?	0	?
437	+	-	++	-	0	0	0	-	0	-	-	0	++	0	0	I	0
439	++	+	++	-	0	0	0	-	0	+	-	0	++	I	I	-	++
440	+	+	++	-	0	--	0	-	I	-	+	0	++	I	0	0	0
453	I	+	++	-	0	0	0	-	I	+	+	0	I	0	0	0	0
454	+	+	++	-	0	0	0	-	I	+	+	0	I	0	0	0	0
455	+	+	++	I	0	--	0	-	-	-	+	0	-	0	0	0	0
462	+	+	++	++	--	0	0	-	0	+	+	0	-	0	0	0	0
463	I	-	-	-	0	--	0	-	I	-	-	0	-	I	I	0	0
467	+	+	++	I	0	0	0	-	I	-	-	0	-	0	0	0	0
560	+	+	++	-	0	--	0	-	I	-	+	0	I	I	I	0	0
569	++	+	++	+	0	-	0	-	I	+	+	0	I	I	I	0	0
570	++	++	++	++	0	0	0	-	I	-	++	0	++	I	I	0	0
574	++	+	++	-	0	-	0	-	I	+	+	0	++	0	0	0	0
579	++	+	++	+	0	0	0	-	I	+	+	0	++	I	I	0	0
580	++	+	++	-	0	0	0	-	I	-	-	0	++	0	I	0	0
586	++	+	-	+	--	0	0	-	I	-	-	0	++	I	0	0	0
587	++	+	-	I	0	0	0	-	I	-	-	0	++	I	I	0	0
588	++	-	++	I	--	0	0	-	-	-	-	0	++	++	0	I	0
590	++	-	++	-	0	-	0	-	-	-	-	0	-	0	0	0	0
592	++	+	-	-	--	-	-	-	I	-	-	0	I	I	I	I	0

The selection of sites – given Oxford's well-documented housing need - was based primarily on whether they were deliverable or not. Some of the rejected sites which scored well against the sustainability criteria were not taken forward for reasons that were not picked up through the

sustainability appraisal process directly. Reasons for rejection included sites had commenced development (e.g. 010 BT site, 025 Horspath Site) and no landowner interest (e.g. 017 Crescent Hall, 050 Paul Kent Hall, 097 Jackdaw Lane Scrapyard). Some sites had difficult access, while others were well-used public open space.

Of the remaining sites, some which scored less well against the sustainability criteria needed to be allocated in order to ensure that Oxford could deliver as much affordable housing as possible in line with the preferred strategy approach.

7. Assessing the Local Plan policies and sites

The SEA Directive requires information on "the likely significant effects [of the plan] on the environment, including on issues such as biodiversity population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors". These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects. (Annex If).

7.1 Introduction

The purpose of this stage is to predict and evaluate the social, economic and environmental effects of the Draft Local Plan 2036, which comprises the plan policies and site allocations. The appraisals have suggested measures for minimising negative impacts and enhancing positive impacts: these will be discussed at Chapter 8.

7.2 Task B3: Predicting the effects of the Local Plan policies and site allocations

The plan comprises combinations of the options considered at the preferred options stage. In many cases the preferred options have been combined into fewer policies. A few new policies have been added.

Appraisals were carried out on several iterations of the plan policies: in April, August and September 2018. This involved testing the plan policy against each of the 15 sustainability objectives. The policies were assessed in terms of their impacts *compared to the current situation*, which is felt to be the most easily understandable approach. By definition, a Local Plan proposes development, which in turn has unavoidable environmental consequences. If the plan was appraised *compared to the situation without the plan*, to determine how influential the plan is compared to a 'business as usual' scenario, most of the appraisal would be positive.

Appendix 3 shows the results of these appraisals, and summarises the changes made to the policies over time. Table 7.1 summarises the appraisals of the plan policies. The appraisals of the site allocations are provided in full at the site assessment report (see Table 3.3). Table 7.2 summarises the site appraisals. Table 7.3 discusses the total impacts of the plan – both policies and site appraisals.

Table 7.1 Appraisal of plan policies

Plan policy	1. Flooding	2. Vibrant communities	3. Housing	4. Human health	5. Poverty, social exclusion	6. Education	7. Essential services	8. Green spaces	9. Biodiversity	10. Urban design & heritage	11. Transport, air	12. Water, soil	13. Climate change, energy	14. Economy, employment	15. Sust. tourism	Adjacent authorities
2. ECONOMY																
E1 Employment sites		+	+	I	+		I		I		+/-		I	0		+

Table 7.1 Appraisal of plan policies

Plan policy	1. Flooding	2. Vibrant communities	3. Housing	4. Human health	5. Poverty, social exclusion	6. Education	7. Essential services	8. Green spaces	9. Biodiversity	10. Urban design & heritage	11. Transport, air	12. Water, soil	13. Climate change, energy	14. Economy, employment	15. Sust. tourism	Adjacent authorities
E2 Teaching and research		I	+	0		+	+				+/-			+	0	
E3 New academic floorspace		0	0			0								+		
E4 Opportunities for local		+			++	+					+		+	++		+
3. HOUSING																
H1 Scale of housing prov.	-	+/-	+	I	I	I	0	-	-	+/-	+/-	-	+/-	+		--
H2 Affordable housing		+	++	0	++						+			+		+
H3 Employer-linked		+	++	+	+	0	0							+		+
H4 Mix of dwelling sizes		+	+		+		I			0	I			+		+
H5 Loss of dwellings		0	0											0		+
H6 HMOs		0	+/-							0						
H7 Community-led and self		0	0		0					0						
H8 New student accommodat		0	0			+	0				+					
H9 Linking delivery of new		+	+			-								+/-		
H10 Accessible & adaptable				+												
H11 Older person		0	+	+	+											
H12 Travelling community			0													
H13 Boat dwellers			0													
H14 Privacy, daylight				+						+			0			
H15 Internal space standards			+	0	0									+/-		
H16 Outdoor amenity space	0		+/-	+					+/-							-
4. RESOURCES AND ENVIRONMENT																
RE1 Sust design & construc	+		I		+				+	I	I	+/-	++		I	+
RE2 Efficient use of land		0	++		+		I			I	+		+	+		+
RE3 Flood risk management	0		+	0		0	I	0	0			0	0			
RE4 Sustainable urban drainage	+		0	0			+		0	+		+	0			
RE5 Health, wellbeing, HIA		+		+	+			I			I					
RE6 Air quality			I	+					+		++		I			
RE7 Managing impact		+	+	0				+/-	0	0				+/-		
RE8 Noise and vibration		+	+/-	0				+/-	0		+/-			+/-		
RE9 Contaminated land				0					0			0				
5. GREEN SETTING																
G1 Protect of blue, green	0	+/-	0	0				0	0	0	0	0	0	0	0	
G2 Protect of biodiversity	0		+/-	0				0?	0?			0	0			
G3 Green Belt			+/-	+/-				-	-	-		-	-	+/-		
G4 Allotments, food grow	I	I		I				I	I	I	0	I				
G5 Outdoor sports		0	+/-	0				0								
G6 Residential garden land	-	+	+					0	-	I		-	-			
G7 Other green/open space	-	+/-	+	I			+	-	+/-	I		-	-			
G8 Protect existing GI				0				0	0	0			0	0		
G9 New and enhanced GI			+/-	+				+	I	+		I	0			
6. HERITAGE																
DH1 High quality design			0	0						+						
DH2 Views & building heights			-							0				-	0	
DH3 Desig heritage assets										0					0	
DH4 Archaeologic. remains						0?				0?						
DH5 Local Heritage Assets		0	-							0				-	0	
DH6 Shopfronts and signs										0				0	0	
DH7 External servicing feat										0	+			+		
7. EFFICIENT MOVEMENT																
M1 Prioritising walking, cycling		+		0	+						+		0	+/-	0	+

Table 7.1 Appraisal of plan policies

Plan policy	1. Flooding	2. Vibrant communities	3. Housing	4. Human health	5. Poverty, social exclusion	6. Education	7. Essential services	8. Green spaces	9. Biodiversity	10. Urban design & heritage	11. Transport, air	12. Water, soil	13. Climate change, energy	14. Economy, employment	15. Sust. tourism	Adjacent authorities
M2 Assess & manage devel				0			0				+		+	+/-		+
M3 Motor vehicle parking	0	+	+	+	+/-		I			+	++		+	-	+/-	+
M4 Electric charging points				+					+	-	+		+			+
M5 Cycle parking		0	+/-	+			0			+/-	+		0	0	0	
8. RETAIL, COMMUNITY AND INFRASTRUCTURE																
V1 Vitality of centres		0		0	0		0			I	0			0	0	
V2 City centre shopping fronta		0					0							0		
V3 Covered Market		+/-								0				0		
V4 Sustainable tourism		0	0								0			+	+	
V5 Cultural/social activities		+	0	0	0	0				0	0			+	+	
V6 Infrastructure & communit		0		0	+	0	0				0					
V7 Utilities				0		+	I				0	I	0	0		I

Table 7.2 Appraisal of site allocations

Site	Site appraisal criteria																
	Vehicle access	Walking & cycling	Bus	Train	Flood risk	Topography	Contamination	Air quality	Neighbouring land uses	Distance to prim. sch.	Distance to GP	Regeneration	Land type	Townscape	Heritage	Biological	Green infrastructure
SP1 Sites in West End																	
SP2 Osney Mead	++	+	-	+	--	0	0	-	I	-	-	0	++	I	0	0	0
SP3 Cowley Centre	++	++	++	-	0	0	0	-	I	+	+	0	++	I	I	0	0
SP4 Blackbird Leys Central Area	++	+	++	I	0	0	0	-	I	+	+	+	++	0	0	0	0
SP5 Summer Fields School	I	I	++	-	0	-	0	-	0	-	++	0	-	0	0	0	0
SP6 Diamond Place & Ewert Hous	++	++	++	-	0	0	0	-	I	-	+	0	++	0	0	0	0
SP7 276 Banbury Road	+	++	++	-	0	0	0	-	0	-	+	0	++	0	0	0	0
SP8 Unipart	++	+	++	-	0	0	-	-	0	-	-	0	++	0	0	0	0
SP9 Oxford Mini plant	++	+	++	I	0	0	-	-	-	-	-	0	++	0	0	0	0
SP10 Oxford Science Park	++	-	++	I	--	0	0	-	-	-	-	0	++	0	-?	-?	0
SP11 Oxford Business Park	++	+	-	I	0	0	0	-	I	-	-	0	++	I	I	?	0
SP12 Sandy Lane Recreat. Ground	++	+	++	I	0	-	0	-	I	-	-	0	I	0	0	0	0
SP13 Northfield Hostel	++	+	++	I	0	0	0	-	-	+	-	0	I	0	0	0	0
SP14 Edge of … Oxford Academy	+	+	++	I	0	0	0	-	I	-	-	0	-	0	0	0	0
SP15 Kassam Stadium	++	+	++	I	--	0	?	-	0	-	-	0	++	0	0	0	0
SP16 Knights Road	++	+	++	I	--	0	-	-	-	-	-	0	++	0	-	0	0
SP17 Govt. Buildings and Har. Hse	+	+	++	-	0	-	0	-	I	+	-	0	++	I	0	0	0
SP18 Headington Hill Hall	+	+	++	-	0	--	0	-	I	-	+	0	I	I	I	0	0
SP19 Land su St Clements Church	+	++	++	-	--	-	0	-	0	-	-	0	-	I	I	0	0
SP20 Churchill Hospital site	++	+	++	-	0	-	0	-	I	-	-	0	++	0	-	I	0
SP21 Nuffield Orthopaedic Centre	++	+	++	-	0	0	0	-	I	+	-	0	++	0	0	0	0
SP22 Old Road campus	++	+	++	-	0	0	0	-	0	-	+	0	++	0	0	I	0
SP23 Warneford Hospital	++	+	++	-	0	0	0	-	I	-	+	0	I	0	I	I	0
SP24 Marston paddock	++	+	++	-	0	-	0	-	0	-	-	+	-	I	0	0	0
SP25 St. Frideswide Farm	+	+	++	+	0	0	0	-	I	-	-	0	-	0	0	0	0
SP26 Hill View Farm	++	+	++	-	0	0	0	-	-	-	-	0	I	++	0	0	0

Table 7.2 Appraisal of site allocations

Site	Site appraisal criteria																
	Vehicle access	Walking & cycling	Bus	Train	Flood risk	Topography	Contamination	Air quality	Neighbouring land uses	Distance to prim. sch.	Distance to GP	Regeneration	Land type	Townscape	Heritage	Biological	Green infrastructure
SP27 Land west of Mill Lane	+	+	++	-	0	0	0	-	-	-	-	0	-	0	0	0	0
SP28 Park Farm	+	+	++	++	--	0	0	-	0	+	+	0	-	0	0	0	0
SP29 Pear Tree Farm	++	-	++	-	0	-	0	-	-	-	-	0	-	0	0	0	0
SP30 Land east of Redbridge P&R	+	+	++	-	--	-	0	-	-	-	-	0	-	-	0	0	0
SP31 St Catherine's College	++	+	-	-	--	-	-	-	I	-	-	0	+-	-	-	-	0
SP32 Banbury Rd university sites	++	+	++	-	0	-	0	-	I	+	+	0	++	I	-	0	0
SP33 Bertie Place recreat ground	I	+	++	-	--	--	-	-	-	-	-	+	-	0	0	-?	0
SP34 Canalside land	++	+	++	+	--	0	0	-	-	+	+	0	++	I	I	I	0
SP35 Court Place gardens	++	+	++	-	--	--	0	-	I	+	-	0	I	I	I	-	0
SP36 Cowley Marsh depot	++	+	++	I	-	0	-	-	I	+	+	0	++	0	0	0	0
SP37 Faculty of Music, St Aldate's	+	++	++	+	0	0	0	-	I	-	+	0	++	I	-	0	0
SP38 Former Barns Rd E allotmen	I	I	++	-	0	-	0	-	-	+	-	0	-	0	0	0	0
SP39 Former Iffley Mead playing f	I	I	++	-	0	0	?	-	I	+	+	0	-	0	I	0	0
SP40 Grandpont car park	++	+	++	+	0	0	-	-	-	+	+	0	++	I	0	0	0
SP41 Jesus College sports ground	+	+	++	-	0	0	0	-	I	-	-	0	-	0	0	0	0
SP42 John Radcliffe Hospital site	++	+	++	-	0	0	0	-	0	-	+	0	++	0	I	0	0
SP43 Land at Meadow Lane	+	+	++	-	--	-	0	-	I	-	+	0	-	--	0	0	0
SP44 Lincoln College sports groun	+	++	++	-	0	-	0	-	0	-	++	0	-	I	-	0	0
SP45 Littlemore Park	++	+	++	-	--	-	0	-	0	-	-	0	++	0	0	-	I
SP46 Manor Place	+	++	++	+	-	I	0	-	I	-	-	0	-	I	I	I	0
SP47 Manzil Way	++	+	++	-	0	-	0	-	I	+	+	0	++	0	0	0	0
SP48 Nielsen, London Road	++	+	++	-	0	-	0	-	-	+	-	0	I	0	0	0	0
SP49 Old power station	++	+	++	++	--	0	0	-	0	+	-	0	++	-	-	0	0
SP50 Oriel College land	++	++	++	+	0	0	0	-	0	-	+	0	++	I	-	0	0
SP51 Oxford Brookes Marston Rd.	++	+	++	-	0	0	0	-	0	+	-	0	++	I	I	-	0
SP52 Oxford Stadium	++	+	++	-	0	0	-	-	0	+	-	0	++	0	I	0	0
SP53 Oxford Univ Press sports gr	+	+	++	+	0	0	0	-	I	-	-	0	-	0	0	0	0
SP54 Pullens Lane	+	+	++	-	0	--	0	-	I	-	+	0	++	I	0	0	0
SP55 Radcliffe Observatory Quart	++	+	++	+	0	0	0	-	I	+	+	0	++	I	I	0	0
SP56 Ruskin College campus	++	+	++	-	0	-	0	-	0	-	+	0	I	I	I	0	0
SP57 Ruskin Field	I	-	-	-	0	--	0	-	I	-	-	0	-	I	I	0	0
SP58 Slade House	++	+	++	-	0	0	0	-	0	-	++	0	++	0	0	I	0
SP59 Summertown House, Apsley	++	+	++	-	0	0	0	-	I	-	-	0	++	0	I	0	0
SP60 Union Street car park	++	++	++	-	0	0	0	-	I	+	+	0	++	0	0	0	0
SP61 Univ of Oxford science area	++	++	++	+	0	0	0	-	I	-	-	0	++	I	I	0	0
SP62 Valentia Rd	+	+	++	-	0	0	0	-	I	-	+	0	-	0	0	0	0
SP63 West Wellington Sq	+	++	++	+	0	0	0	-	0	+	+	0	++	I	I	0	0
SP64 Wolvercote paper mill	++	+	++	-	--	0	0	-	0	-	-	0	I	I	I	I	I
SP65 Bayards Hill primary school	++	+	++	-	0	0	0	-	I	+	+	+	-	0	0	0	0
SP66 William Morris Close sports	+	+	++	I	0	0	0	-	I	-	+	0	-	0	0	0	0

Table 7.3 Total plan impacts

1. Flooding	There will be negative impacts from new housing and employment development (15 sites are at least partly in flood zone 3), and the plan allows development of brownfield sites in flood zone 3b as long as they have very high standards of mitigation. However the plan's use of the NPPF's flood hierarchy, SuDS, planting, and sustainable design will all help to minimize impacts on flooding.

Table 7.3 Total plan impacts	
2. Vibrant communities	The plan protects existing communities by limiting the proportion of HMOs, and supporting the provision of new student accommodation, accommodation for older people and community-led housing. It aims to protect local centres and locally valued assets, supports walking and cycling, and sets strict limits on additional parking. The plan's general approach is to intensify development on brownfield sites, and allocate for housing only Green Belt sites rated as having a 'moderate' and 'low' impact on the Green Belt.
3. Housing	Oxford cannot meet all of its housing need within its own administrative boundary and so continues to work with adjoining authorities to deliver its objectively assessed housing need (OAHN). The plan sets a capacity-based target aimed at meeting as much of the OAHN as possible. It allocates Green Belt sites for housing that are rated as having a 'moderate' or 'low' impact on the Green Belt. It prioritises the delivery of affordable housing and requires a proportion of affordable housing as part of qualifying developments. The policies regarding student accommodation, conversion of employment land to housing, and strongly controlled parking will also contribute to providing housing. The quality of housing is ensured through policies on sustainable design and construction, and high quality design.
4. Human health	The plan's strong focus on walking and cycling, protection of green areas, provision of new green areas, and provision of more housing will all support human health. Electric vehicles and air quality assessments will help to improve air quality and thus health.
5. Poverty, social exclusion and inequality	The plan will help to reduce inequality through the provision of more affordable housing, a balanced mix of housing, protecting key employment sites, opportunities for local training and work, and support for walking, cycling and public transport. The plan's focus on good housing design will reduce operating costs, and it supports opportunities for local training and work.
6. Education	Given the limited land available in the city, most school provision will need to be made by expanding existing schools. The plan also supports university expansion as long as more student accommodation is provided.
7. Essential services	The plan protects existing services and facilities, and supports their multi-functional use. Much of its impact will depend on how it is implemented.
8. Green spaces	The plan protects green spaces and sports facilities, creates a green infrastructure network, and requires that at least 10% of larger sites must be new public open space. However it also promotes construction of housing on greenfield and Green Belt land: eight sites (SP24-SP31) totaling 18 hectares are in the Green Belt. Eleven recreational sites would be affected, and no replacement sites would be provided for some of these.
9. Biodiversity	The plan seeks to protect a hierarchy of designated sites and wildlife corridors. It requires the use of a biodiversity calculator to demonstrate net gains in biodiversity. The policies on air quality, land contamination, noise and flooding will also indirectly help biodiversity. However the plan involves construction on a range of greenfield and Green Belt sites: about a dozen sites are near or partly in nature conservation areas. There will also be infill development elsewhere in Oxford, often on gardens which provide some habitat for wildlife.
10. Urban design and heritage	The plan policies on the historic environment, townscape character and urban design promote the preservation and enhancement of the historic environment, and city's townscape/landscape. The policy on building height will help to ensure variety and good design of buildings. Indirectly there will be benefits from the policies on constrained car parking and new landscaping. However, the level of housing and economic growth will generally lead to a more urban environment, could have

Table 7.3 Total plan impacts	
	negatively affect Oxford's green setting and historic environment. A range of heritage and landscape designations would be affected.
11. Transport and air quality	The plan includes some strong and innovative requirements to reduce traffic and congestion, promote walking and cycling, and improve air quality in Oxford. These include a transport mode hierarchy; parking controls and promotion of car-free development; charging points for electric vehicles; requirements for air quality assessments; and clustering of services in district centres that are easy to reach by non-car modes. Most of the development sites are well served by walking, cycling and bus routes, though most sites do not have good access to the train station. Some of the policies on economic growth might have a negative impact by intensifying development at existing employment location, but controls on parking will help to counter this. The general increase in housing across the city as a result of the plan could also lead to negative impacts on air quality and traffic levels in some areas.
12. Water and soil	The level of housing and economic growth, and allocation of Green Belt land for development will all increase water use and negatively affect soil. However the plan aims to minimise additional water use by requiring increased water efficiency measures for new residential developments. The plan requirements for SuDS will help to minimize water pollution and flooding.
13. Climate change and energy	The plan strongly supports energy efficient design and construction. It supports walking and cycling as an alternative to the private car, and restricts parking, thus making the private car less attractive. The plan supports energy efficient heat networks by expecting developments near the networks to hook up to them. Policies on SuDS and other climate change adaptation measures will help to deal with the impacts of climate change. However the increase in households will probably lead to an overall increase in CO_2 emissions in the short term.
14. Economy and employment	The plan does not provide new employment land but supports the more efficient use of existing employment sites, i.e. more floorspace on the same footprint. It also provides more homes: lack of housing for workers currently constrains employment. The plan's focus on widening the role of district centres and promoting sustainable tourism will further support the economy. The plan does include some constraints, i.e. restricted car parking, limitations on tall buildings, but it is consistent with the LEP's high growth vision for Oxfordshire
15. Sustainable tourism	The plan supports longer stays and greater spend in Oxford city by increasing the quality of existing tourist attractions and only permitting new tourist attractions where they will not increase road congestion. Indirectly, it supports tourism through its policies on conservation of the historic environment, townscape character and urban design, the Covered Market, and promotion of sustainable transport modes. However these impacts are likely to be limited.
Impact on adjacent authorities	The Oxford Local Plan does not provide for all of Oxford's objectively assessed need for housing, thus requiring adjacent authorities to provide for the remaining OAHN. However, the plan aims to provide housing on a capacity basis, including significant quantities of affordable housing. It also aims to minimise the need to travel (e.g. commute in and out from adjacent authorities); and it supports the LEP economic growth plan.

7.3 Task B4. Evaluating the effects of the Local Plan

The plan evaluation stage involves evaluating the plan's secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects; and determining how significant they are. This section considers these impacts in turn.

Secondary effects

Secondary (or indirect) effects are effects that are not a direct result of the plan, but occur away from the original effect or as a result of a complex pathway. The plan's main secondary effects include:

- A combination of strong parking controls and an emphasis on walking, cycling and public transport. This helps to reduce the need to travel, with consequent benefits in terms of congestion, air pollution, and associated health effects. This also allows the plan to provide for more dwellings than it could without these controls, as air pollution problems at the Oxford Meadows SAC constrain the amount of additional air pollution that the plan is allowed to generate.
- A capacity-based approach to housing provision, which means that some of the city's housing need will need to be provided by adjacent authorities.
- Some development on greenfield and Green Belt sites, with secondary impacts on land use, biodiversity, flooding etc.
- A focus on provision of new homes – and particularly affordable homes - which should help to reduce inequalities and the need to commute.
- Health benefits of improved air quality, better walking and cycling facilities, affordable housing.

Cumulative effects

Cumulative effects are social, environmental or economic changes that are caused by the plan in combination with other past, present and future human actions. In practice, cumulative effects are the total plan impacts plus the likely future without the plan. Table 7.3 shows the total impacts of the Oxford Local Plan, and Table 4.7 shows the likely future without the Oxford Local Plan. Table 7.4 brings together the two tables to discuss cumulative effects.

Table 7.4 Cumulative effects

SA objective	Total plan effects	Likely future without the plan	Cumulative effects	
1. Flooding	-	+/-	-	The Oxford Flood Alleviation Scheme will reduce flooding overall, but 1800 homes will still be at risk of flooding. The plan proposes some housing sites in flood zone 3. It also promotes the NPPF's flood hierarchy, SuDS, planting, and sustainable design, which will help to minimize flood impacts.
2. Vibrant communi-ties	+	++	++	Retail in Oxford has been consistently strong. The plan protects existing communities by intensifying development on brownfield sites, limiting the proportion of HMOs,

Table 7.4 Cumulative effects				
SA objective	Total plan effects	Likely future without the plan	Cumulative effects	
				supporting the provision of appropriate accommodation, and retaining the city's higher grade Green Belt land.
3. Housing	+	--	--	House prices in Oxford are already very high, affecting employers' ability to attract and retain workers. They are likely to increase further over time. The plan is for 8,620 more homes in Oxford, including a high proportion of affordable homes, but this will not provide for all of Oxford's objectively assessed housing need.
4. Human health	+	+	+	The health of Oxford's residents is generally good, but there is great disparity between residents of the city's more and less deprived areas. The plan's strong focus on walking and cycling, green areas, improved air quality and affordable housing will support human health.
5. Poverty, social exclusion and inequality	I	--	-	There are sharp inequalities across the city in terms of opportunities, wellbeing and health. Regeneration is already planned for the more deprived areas, and the plan's focus on affordable housing, local training and work, and public transport should further help to reduce these disparities.
6. Education	0	0	0	Oxford's population overall is highly skilled, but 22% of people of working age have low or no qualifications. This disparity is strongest in the most deprived areas of the city. The plan has limited ability to improve this, but it supports university expansion and aims to ensure that adequate services, including educational services, are provided.
7. Essential services	I	0	0	There is no obvious shortage of essential services in Oxford. The plan protects existing services and facilities, and supports their multi-functional use.
8. Green spaces	++	-	+	Oxford has many green spaces, including Port Meadow, the river corridor and the Green Belt. The plan aims to protect green spaces and create a green infrastructure network, but it also promotes housing on a range of playing fields, and on 18ha of Green Belt land.
9. Biodiversity	-	-	-	Oxford has a wide range of green spaces which are generally of good quality, but biodiversity is plummeting worldwide. The plan seeks to protect wildlife sites and biodiversity generally, but it includes several development sites that would affect sites of biodiversity interest.
10. Urban design and heritage	+/-	++	++	Oxford's heritage and urban design is internationally known. The level of housing and economic growth promoted by the plan could affect this by leading to a more urban environment, but the plan's promotion of historic preservation and enhancement should help to minimise this.
11.	+/-	+/-	0	Oxford has much higher levels of cycling and public transport

Table 7.4 Cumulative effects				
SA objective	Total plan effects	Likely future without the plan	Cumulative effects	
Transport and air quality				use than elsewhere, but congestion is bad. All of Oxford is an AQMA. Air quality is improving nationally due to tightening vehicle exhaust standards. The plan includes strong parking constraints, promotes walking and cycling, and aims to improve air quality; but its overall increase in housing could negatively affect air quality and congestion in some areas.
12. Water and soil	-	--	--	Oxford is in an area of serious water stress. The plan aims to minimise additional water use per person, but the growth in population is likely to counterbalance this. Water quality in the Thames catchment is moderate: run-off from increased development could worsen this although the plan aims to minimise this increase through the promotion of SuDS etc.
13. Climate change and energy	+/-	--	--	Climate change is a serious problem internationally. The plan strongly supports energy efficient design, construction and transport; and renewable technologies. However the increase in households will probably lead to an overall increase in CO_2 emissions, at least in the short term.
14. Economy and employ-ment	+	++	++	Oxford has a very strong economy, which will be further strengthened by the Oxfordshire Housing and Growth Deal, and the Oxford - Milton Keynes – Cambridge 'knowledge arc'. The plan supports these measures.
15. Sustainable tourism	+/-	++	++	Tourist numbers to Oxford are high and growing. The plan supports longer stays and greater spend in Oxford city, but these impacts are likely to be limited.

Synergistic effects

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. The plan's main synergistic effects include:

- Provision of more affordable homes, promotion of employer training/apprenticeships, and support for walking and cycling, which should synergistically help to reduce inequalities.
- Constraints on parking, requirements for air quality assessments, and support for walking, cycling and public transport, which should synergistically help to improve air quality (although this may be counterbalanced by the air pollution from the Oxford-Cambridge expressway).
- Support for employer-linked housing, intensification of employment sites, and high-tech employment which should, synergistically with the Oxfordshire Housing and Growth Deal, support the economic growth of the county.

Short-term and long-term impacts

The plan's key short-term (first ten years) impacts are likely to be related to construction on housing and employment sites: more HGV movements, noise, dust etc. The longer-term (second ten years) impacts are likely to be more positive, and will include:

- An increase in homes, including affordable homes and a significant quantity of car-free development
- An increase in publicly-accessible green infrastructure, and walking/cycling infrastructure
- A decrease in air pollution, with associated health benefits
- An increase in the urbanized, developed area of the city, and a decrease in the undeveloped area
- An increase in employment floor area, though not a correspondent increase in area of employment land (i.e. intensification of existing employment sites)
- A gradual change in the district centres over time, from a predominantly retail focus, to a focus on a range of employment, retail and leisure uses
- More electric vehicle charging points.

Permanent and temporary impacts

Again, the plan's temporary impacts will primarily be associated with construction, and will abate as the development sites become operational. More permanent impacts of the plan will include:

- Denser and more urbanized land uses, including construction on greenfield land
- Changes to the skyline, for instance the construction of new spires
- Remediation of contaminated land
- Increased pressure on water resources due to the increase in the city's population
- Economic growth for the foreseeable future.

8. Mitigation

Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects

The SEA Directive requires a description of "the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan" (Annex Ig).

8.1 Introduction

The Oxford Local Plan 2036 aims to promote sustainable development that will meet Oxford's social and economic needs while at the same time not having an adverse impact on the environment. Many of the plan policies and objectives are specifically designed to overcome adverse effects that have arisen as a result of previous developments not having regard to sustainability issues.

As a result of the assessments of Chapters 6-7, this SA has identified additional possible measures to avoid and minimise any negative effects of the plan, and to enhance its benefits. It has also identified topics *not* covered by the plan that could be covered. Section 8.2 discusses mitigation related to plan policies. Section 8.3 discusses mitigation related to sites.

8.2 Mitigation for policies

As discussed at Chapter 6, the plan went through several rounds of appraisal, discussions and consultation; and several rounds of suggested SA mitigation measures. Many of the plan policies already minimise the impacts of the rest of the plan. For instance the policies on parking on air quality assessments help to reduce air pollution; the policy on flooding helps to reduce flood risk; and policies on green infrastructure and protection of nature conservation sites help to protect biodiversity.

The SA report for the preferred options (Table 3.3) proposed mitigation measures for the options considered at that stage. **Appendix C** shows those mitigation measures suggested in the later rounds of plan-making.

It is not possible to precisely identify the influence of the SA process, as other inputs to the plan also influence it. However Table 8.1 shows changes made to the plan, beyond minor changes/ clarifications of wording, that are consistent with the mitigation suggested in various rounds of the SA. Table 8.2 lists some of the main recommended SA mitigation measures - including measures related to topics not covered in the plan – which have not been included in the plan.

Table 8.1 Plan changes consistent with suggested SA mitigation measures

Name of policy	Plan changes consistent with suggested SA mitigation measures
E1. Employment sites	Prevention of loss of any Category 1 sites. Start-up or incubator businesses are permitted if they can demonstrate that they will not negatively impact on the main economic function of the site.
E3. New academic or	Growth in private colleges expected to lead to no net loss of

Table 8.1 Plan changes consistent with suggested SA mitigation measures	
Name of policy	**Plan changes consistent with suggested SA mitigation measures**
administrative floorspace	housing.
E4. Securing opportunities for local employment etc.	Definition in the glossary of what is meant by 'local people'.
H3. Employer-linked affordable housing	Specify that 100% of the housing will meet the definition of affordable housing and be available in perpetuity.
H7. Community-led and self-build housing	More information in the policy about affordable housing.
H8. Provision of new student accommodation	Inclusion of bespoke housing targets for each university.
H14. Privacy and daylight	Removal of a '20m rule'.
Adapting to climate change	Deletion of policy which overlapped with another policy
RE1. Sustainable design and construction	Inclusion in the supporting text of information about sustainable retrofitting of buildings
RE2. Efficient use of land	Inclusion of suggested density standards for parts of the city, as suggested by the NPPF 2018; but later removal of these standards.
RE3. Flood risk management	Increased information about how land affected by the Oxford Flood Alleviation Scheme should be considered.
RE5. Health, wellbeing etc.	Inclusion of information about social exclusion (not just health inequalities) in the introduction and chapter 1
RE6. Air quality	Reference to air pollution impacts on the Oxford Meadows SAC in the explanatory text.
RE7. Managing the impact of development etc.	Removal of partial overlap with policy RE8 re. noise and vibration.
G2. Protection of biodiversity and geodiversity	Wording on sites of local importance for wildlife strengthened, to be more consistent with Policy G7.
DH1. High quality design and placemaking	Inclusion of more information on the design of external areas, including landscaping and public art.
DH2. Views and building heights	Inclusion of requirement for proposals for tall buildings to explain design choices regarding height and massing.
M1. Prioritising walking, cycling and public transport	Greater emphasis placed on developers to demonstrate how their street design ensures a good cycling and walking environment.
	Clarification that coaches will only drop off and pick up at existing stops, and then must leave the city and go to the longer stay parking area at Redbridge.
M2. Assessing and managing development	Removal of reference to B8 freight consolidation facilities.
	Reference to car clubs in the explanatory text.
M3. Motor vehicle parking	Inclusion of a policy on electric vehicle charging.
	Reinstatement of deleted reference to employer-linked housing.
M5. Cycle parking	Inclusion of requirement that cycle parking should be well designed.
	Cycle parking standards appendix now refers to electric bike charging.
V6. Cultural and social activities	Inclusion of requirement that cultural and social activities should not adversely affect residential amenity.

Table 8.2 Key proposed SA mitigation measures not implemented in the plan		
Name of policy	**Key proposed SA mitigation not included in the policy**	**Reason for lack of inclusion**
RE1. Sustainable design and construction	Clarification about how close to a heat network a development will need to be to be expected to hook up to it.	There is no good rule of thumb for this: depends on whether the ground is hard or soft, and underground conditions and infrastructure.
RE6. Air quality	Specification that exposure to air pollution refers to exposure of ecosystems as well as people. Clarification about what types of mitigation measures might be required where negative air quality impacts are identified, e.g. electric vehicles, car-free development.	General move towards E vehicles is promoted throughout Chapter 7 and mention of the zero emission zone and all of its benefits. Background paper has been written on air quality.
G7. Other green and open spaces	Reference to development not increasing flood risk.	This is covered by the flood risk policies.
DH7. External servicing features	Removal of partial overlap with policy M5 about cycle parking.	There is some overlap, but seems important enough to cover from both angles!
M1. Prioritising walking, cycling and public transport	Clarification of how walking, cycling and public transport should be 'prioritised'.	Demonstrated through commitment to the range of measures such as demand management, change in the use of road space (measures that will be implemented by County Council as Transport Authority). Reduction in car parking policy, provision of bike parking etc
M3. Motor vehicle parking	The policy makes car-free development dependent on the roll-out of controlled parking zones (CPZs), which gives great uncertainty to developers and could have land-owners lobbying against CPZs. It could also encourage car-free development on the edges of CPZs, leading to additional parking problems outside the CPZs. Should it be the other way around, i.e. CPZs will be supported in areas XYZ?	There is a commitment to CPZs from the County Council. It cannot be added to the plan as is not within the City Council's gift to deliver CPZs. A large amount of CIL money has been given by the City Council to the County for the expansion of CPZs. There is a CIL 123 list. It is not possible to extend into sites not currently in CPZs because of this list.
M4. Provision of electric charging points	Inclusion of design criteria for electric charging points, especially in the city centre and conservation areas.	Technology is changing so much that not appropriate to be specific. The impacts on conservation areas is covered by policies in the design chapter.

Table 8.2 Key proposed SA mitigation measures not implemented in the plan		
Name of policy	**Key proposed SA mitigation not included in the policy**	**Reason for lack of inclusion**
V8. Infrastructure and community facilities	Further information about what is meant by 'infrastructure', and requirements for infrastructure.	Defined in the Infrastructure Delivery Plan, which is referred to by Policy V8.
	Information about situations where existing facilities are under-used.	Not available; possibly monitored by another team.
Topics not included in the plan	1. Homeless shelters and generally treatment of homelessness 2. Regeneration areas 3. Driverless cars 4. Public toilets	1. After discussion with the housing team about homeless strategy it seems that the plan does not require any specific policies or policy wording. 2. The Blackbird Leys area has been re-drawn, but where a regeneration area has few allocated sites or areas of change there is not much scope to write anything into the Plan. 3. At this point no policy approach seems necessary or possible. 4. Public toilets are not really a planning issue

8.3 Mitigation for sites

Chapter 9 of the Local Plan discusses the 66 site allocations. These include thirteen sites that are at least partly prone to flooding; eight Green Belt sites; eleven recreational areas; sites that have potential but still uncertain biodiversity interest or that could affect nearby biodiversity designations; and at least six sites that could affect heritage designations.

For the sites in the flood zones (SP2, 10, 15, 19, 28, 30, 33, 34 35, 45, 49, 64), the plan provides a combination of sequential test justifying the need for the site; requirement for a site-specific flood risk assessment; avoidance of those parts of the sites that are liable to flooding; groundwater and surface water flow assessments; and measures to reduce surface water runoff in the area.

The plan as a whole will affect Green Belt land and will increase urbanization. Policy G9 requires all residential sites larger than 1.5 hectares to provide at least 10% of the site as public open space. Additionally, policies SP15, 17, 24-30, 39, 44, 53, and 66 all specify that this is required.

For sites on recreational areas (SP5, 12, 14, 33, 39, 41, 44, 53, 62, 65, 66), the plan shows that these sites are currently under-used; that equivalent facilities will be provided, usually on site; and/or that the need for housing outweighs the benefits of keeping the site as a recreational area.

For sites with possible effects on SSSIs (SP17, 19-23, 28, 30, 32-35, 39, 41, 44, 46, 51, 53, 55, 58, 61, 64, 66), the plan requires a combination of biodiversity surveys; demonstration of how harm to biodiversity will be minimized; proof that the development will not adversely affect nearby SSSIs; retention of important trees; provision of a buffer zone to the nearby SSSI; and analysis of specific types of impacts (recreational, change in water levels) will affect the SSSI. Those sites that could affect slow worms and lizards require buffer zones to allow the animals to move around, and/or studies and translocation package.

For sites that could affect conservation areas (SP17, 18, 19, 23, 24, 26, 32, 34, 37, 41, 42, 44, 46, 49, 50, 55, 56, 57, 61, 63, 64), the plan includes requirements that careful design must ensure that development proposals contribute towards the character of the conservation area.

For sites that could affect listed buildings or their settings (SP23, 32, 34, 35, 37, 41, 42, 44, 46, 50, 55, 56, 57, 59, 61, 63, 64), the plan includes requirements that the development must retain and enhance the listed buildings and/or their settings.

For sites where air quality is already regularly poor or likely to become poor; and for sites with sensitive receivers (health care, community centre, school) the policies require the minimisation of impacts on air quality during the construction phase. This applies to SP2, 6, 20, 21, 23, 29, 33, 34, 37, 38, 42, 47, 50, 54, 58.

Sites with permission for B1 and B2 employment uses (SP8-11) require a reduction in car parking provision at the site, and enhancement/promotion of sustainable travel modes. Student and hospital accommodation (SP16, 18-21, 39, 55, 61) are expected to consolidate and minimise their car parking requirements.

9. Monitoring

Task B6: Proposing measures to monitor significant effects of implementing the Local Plan

The SEA Directive requires a description of "the measures envisaged concerning monitoring" (Annex Ii).

Monitoring is a fundamental activity that allows the effects of the Local Plan to be identified, and the level of implementation of the plan to be assessed.

The City Council produces an Annual Monitoring Report (AMR), which documents the progress of the Local Plan. The AMR will also include indicators to measure and assess the sustainability effects of implementing the Local Plan 2036. These indictors – significant effects indicators – will allow us to understand the environmental, social and economic impacts of the Local Plan policies and to take appropriate action if necessary.

In order to assess the actual social, economic and environmental effects of the Local Plan, and mitigate any unexpected effects of the plan, it will be necessary to monitor a series of issues as shown at Table 9.1.

Table 9.1 Potential monitoring indicators

SA objective	Indicators
1. Flooding	• No. properties at risk from flooding
2. Vibrant communities	• Total population, and population by broad age groups
3. Housing	• Housing approvals, completions and losses • Percentage of new dwelling completions on previously developed land • Amount and percentage of affordable housing
4. Human health	• Provision and improvement of local primary health facilities • Health dimension of Index of Multiple Deprivation
5. Poverty, social exclusion and inequality	• Index of Multiple Deprivation
6. Education	• Provision and improvement of local educational facilities • Education dimension of Index of Multiple Deprivation
7. Essential services	• Provision and improvements of other local facilities • New retail, office and leisure development in the city and district centres • Distance of households from key services, e.g. Post Office, School, doctors
8. Green spaces	• Area of development in the Green Belt and on other greenfield sites
9. Biodiversity	• Change in areas and populations of biodiversity importance • Condition of SSSIs, integrity of SACs
10. Urban design and heritage	• Number of heritage assets at risk
11. Transport and air quality	• Percentage of people travelling to work by private motor vehicle • Air quality

Table 9.1 Potential monitoring indicators	
SA objective	**Indicators**
	• Short and long stay car parking provision in existing centres
12. Water and soil	• Proportion of river length assessed as fairly good or very good for chemical quality and biological quality • Per capita consumption of water
13. Climate change and energy	• Per capita CO_2 emissions • Installed capacity of renewable energy generating development, by type
14. Economy and employment	• Total number of jobs • Proportion of working-ag residents in employment • Amount of employment land available, by type and location
15. Sustainable tourism	• Number of visitors per year • Number of overnight visitors per year

10. Responding to this consultation

The draft Local Plan 2036 and this sustainability appraisal are being made available for public comment until Thursday 13 December 2018. Please send any comments, marked for the attention of Richard Wyatt, to:

Email: planningpolicy@oxford.gov.uk.

Post: Planning Policy Team
St. Aldate's Chamber
109-113 St. Aldate's
Oxford OX1 1DS

Fax: 01865 252144

All responses should be received by 11.59pm on Thursday 13 December 2018

If you have any questions or would like clarification on any aspect of this report please contact Richard Wyatt

Email: rwyatt@oxford.gov.uk
Phone: 01865 252704

All of the SA documents are also available on the website: www.oxford.gov.uk/localplan .

Appendix 1 – Comments from Consultation Bodies on the SA Scoping Report

Consultee	Comments	Action Taken
Historic England	Concerned at the conflation of design and the historic environment (p.7)	These remain in the same chapter (5 Built Environment, Heritage and Creating Quality New Development) but the chapter is divided in to 2 distinct sections.
	Welcome the recognition of the importance of understanding character and of identifying and understanding heritage assets (p.7)	Noted
	Consider the statement that "all grades of harm including total destruction, minor physical harm and harm through change to the setting, can be justified on the grounds of public benefits…" rather unhelpful and very worrying as it approaches the matter of conservation and enhancement of heritage assets from the negative position of allowing harm to their significance and even total destruction…We find it surprising that an authority with world-class heritage assets should choose to emphasise the potential for harm to or loss of those assets rather than their conservation. (p.8)	This text remains in the Preferred Options document as it is a quote from the NPPF paragraphs 133-134
	The paragraphs on the National Planning Policy Framework omit to identify any of the requirements in the Framework for the consideration of the historic environment and heritage assets in local plans. (p.8)	Preferred Options Chapter 5: "Paragraphs 126 to 141 of the NPPF set out a series of requirements for heritage specific policies and decision making".
	Expect the evidence base to reference to the Historic Environment Record, the Oxford Heritage Assets Register and accompanying character statements, the Oxford Heritage Plan, the Archaeological Action Plan and conservation area character appraisals (p.8)	The preferred options document now contains a reference to these documents. The SA Scoping Report will be updated to inform the proposed submission stage.
	There is no mention of archaeology in the relevant SEA theme (p.9)	PO Chapter 5 contains a sub-section on archaeology which contains a set of policies on archaeological remains.
	Welcome the reference to Oxford's "unique and world-renowned built heritage" in paragraph 1.5, but would like to see more as to why and how that heritage has come about and survived to the present day. (p.9)	Noted.
	Welcome the acknowledgement of Historic England as a duty to co-operate body; if any discussions take place regarding Green Belt reviews or incursions into the	Noted.

Consultee	Comments	Action Taken
	Green Belt Historic England should be involved, given the fourth purpose of Green Belts "To preserve the setting and special character of historic towns" (p.9)	
	Table 3.1 could include a reference to the Oxford Heritage Plan (p.9)	PO document makes reference to Oxford Heritage Plan. SA Scoping Report will be updated to include reference.
	Sustainability issues for Design and Heritage in Table 4.2 are weak. There should be a simple statement of "the need to conserve and enhance the historic environment and the heritage assets therein, including their setting. Heritage assets at risk, tall building/the protection of the city's skyline and views, design generally and modern design in historic contexts in particular are other sustainability issues that need to be addressed by the new Local Plan (p.9)	SA Scoping Report will be updated to reflect these changes.
	There should be a discrete section in the SEA for the historic environment (p.10)	Noted.
	The conservation areas without character appraisals and management plans should be noted as a gap in the baseline, as should the date of their designation and whether they have been reviewed since. (p.10)	This will be updated when the Scoping Report is reviewed in time for proposed submission stage.
	The reference to Historic England's Heritage at Risk Register should explain that only higher grade assets are included on the Register, not, for example, grade II listed buildings. (p.10)	This will be updated when the Scoping Report is reviewed in time for proposed submission stage.
	Has the City Council undertaken a survey of the 894 grade II listed buildings or 10 grade II registered historic parks and gardens in Oxford to ascertain whether they are at risk? If not this should be identified as a gap in the baseline. (We consider that the historic environment baseline should describe the current and future likely state of the historic environment). What are the trends in the condition of the historic environment? (p.10)	This has not been undertaken. It will be included as a gap in the evidence base when the revised Scoping Report is published in time for the proposed submission stage.
	Welcome the sustainability objective to "Protect and enhance the historic environment and heritage assets", although it could perhaps say "and their settings". (p.10)	LP Objective 7 'Enhancing Oxford's unique built environment': To preserve and enhance Oxford's exceptional built form with its legacy of archaeology and monuments, historic buildings, modern architecture, important views and setting and distinctive townscape characteristics
	Welcome the decision-making criteria, although would prefer to see "preserve and enhance archaeological	This will be reviewed as part of the Scoping Report review

Consultee	Comments	Action Taken
	remains and features" rather than "Assess, record and plan archaeological features", which rather suggests the eventual loss of such features, which would not be an acceptable objective. (p.10)	in time for the proposed submission stage.
	The criterion relating to views could also include "within" the city" (p.10)	Noted.
	Suggest "the number and proportion of heritage assets at risk" to accompany the proposed indicator for heritage assets at risk and the following additional indicators: • the number of major development projects that enhance the significance of heritage assets or historic landscape character; • the number of major development projects that detract from the significance of heritage assets; and • the percentage of planning applications where archaeological mitigation strategies were developed and implemented; and • % of Conservation Areas in Oxford with an up-to-date character appraisal (and management plan). (p.10)	We will be developing the monitoring framework in time for the proposed submission stage. We will give consideration to and include as appropriate these and/or other suitable indicators to monitor the historic environment.
Environ-ment Agency	Plan should highlight the importance of adopting mitigation and adaptation measures to reduce the City's contribution to the causes of climate change and minimise the impacts of climate change on the City. (p.1)	
	Pleased to see that flood risk, water quality and supplies issues and biodiversity have been considered in background papers and first steps booklet. (p.1)	Noted.
	Pleased to see that a new SFRA will be undertaken to support the new local plan. The updated SFRA would need to be part of the evidence base and subsequently, the local strategic flood risk policy and proposed site allocations should reflect the findings and recommendations of the SFRA. (p.2)	Site Assessments analysed the overall flood zone and worst flood zone of every site using data from the new SFRA. The suite of policies on flood risk and drainage have been informed by the new SFRA.
	SFRA would need to include updated climate change allowances (p.2)	SFRA will be updated to include new flood maps for proposed submission stage.
	OCC should demonstrate through a sequential test that a range of options in the site allocation process has been considered and that development will be located to areas at lowest risk of flooding. In the first instance, sites should be located in flood zone 1 (FZ1). However, even in FZ1 other issues such as surface water flooding may need to be taken in to consideration. (p.2)	Sequential test undertaken.
	NPPG states that where land outside flood risk areas cannot appropriately accommodate all the necessary	Level 2 SFRA will be undertaken if required to

Consultee	Comments	Action Taken
	development, OCC should increase the scope of the assessment to a level 2 SFRA to consider the application of the exception test ensuring that potential sites in areas at high risk of flooding are deliverable. (p.2)	support proposed submission.
	It is important that the Local Plan highlights need to safeguard the land for Oxford Flood Alleviation Scheme (p.3)	Noted.
	The Local Plan should reflect the aim of the Water Framework Directive of achieving good ecological classification in the city's water bodies, or at least to ensure there is no deterioration within said classification. (p.3)	The SA proposed monitoring framework proposes monitoring the quality of Oxford's rivers, with the target of achieving 'good' status.
	OCC should provide up to date classification and data for the waterbodies within the City Council as the national figures are not relevant for the local plan. (p.4)	SFRA covers this.
	As part of our your evidence you will need to identify the water services infrastructure required between the plan years and the potential constraints to development with respect to water services infrastructure and environmental capacity. (p.4)	
	Environment Agency believe that the local plan should highlight that Sustainable Drainages Systems (SUDs) can be used in urban areas to improve the quality of the water environment and prevent deterioration. (p.4)	PO Document includes options on SuDS
	Pleased to see that green infrastructure has been included as a topic to consider. (p.4)	Noted.
	Plan should recognise that where there are new developments adjacent to the city's watercourses, opportunities should be sought to maintain and enhance the river corridors and to contribute to the city's green infrastructure network. (p.5)	PO document includes options on blue and green infrastructure
	Plan should ensure that developing land affected by contamination will not create unacceptable risks to human health and the wider environment, including groundwater (p.5)	PO document includes preferred option relating to contaminated land.
	Local plan and policies should aim at protecting and improving the natural environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land. (p.5)	PO document includes preferred option relating to contaminated land.
Natural England	The Local Plan will need to be based on an up-to-date environmental evidence base including an assessment of existing and potential components of ecological networks to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environmental value is chosen for development, and to ensure the mitigation hierarchy is followed. This should include consideration of European designated sites, Sites of Special Scientific Interest (SSSIs), Local Wildlife Sites (LWSs), Sites of Local	Surveys currently being undertaken for local sites. The results of these will inform the Local Plan 2036.

Consultee	Comments	Action Taken
	Importance for Nature Conservation (SLINCs), Wildlife Corridors, Conservation Target Areas (CTAs), protected species, and habitats and species of principal importance as listed under Section 41 of the Natural Environment and Rural Communities Act 2006. (p.1)	
	An up-to-date evidence base will be needed to inform assessment of any likely effects on these sites of proposals and policies within the Local Plan. (p.2)	Noted.
	In relation to SAC, this will need to include screening under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites (p.2)	SEA Screening to be produced.
	Natural England expects sufficient evidence to be provided to justify the site selection process and ensure sites of least environmental value are selected. (p.2)	Noted.
	The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable (p.2)	Suggestions made where appropriate.
	One of the main issues which should be considered in the SA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment (p.3)	Options assessments all considered air quality.

Appendix 1A – Comments from Preferred Options Consultation on the Sustainability Appraisal

Respondent	Comments	Action Taken
BBOWT	Would be useful to include executive summary and/or conclusion to summarise findings of SA	Non-technical summary will be available as part of Reg.19 Consultation
BBOWT	BBOWT welcomes the assessment of sites against SA objectives. However the impact on allocations is difficult to judge as there is very limited detail on the type and quantum of developments provided. In the absence of such information we have assumed a worst case scenaro i.e. high density development, or increased development quantum to exisiting permissions where these exist.	Noted. It is a good idea to take a precautionary approach in the absence of quantum of development. However, in the Housing and Employment Land Availability Assessment quantum and type of development was suggested for individual sites.
Headington Heritage	Headington Heritage - The SA provides incorrect evaluations as Dunstan Park will become the most accessible and attractive park for residents of Barton Park. Future use should be considered.	The Site Assessments provide an overview of a site's suitability based on a range of criteria. Dunstan Park has not been allocated for development in the Local Plan 2036
Natural England	Natural England - areas of high environmental value should be avoided. Sufficient evidence needs to be provided (in line with para 165 of the NPPF) to inform the SA and HRA and demonstrate that alternatives have been considered and sites of least environmental value are selected.	Further work has now been undertaken to assess the quality of environmental sites. This has informed the selection of sites and the SA process.
Historic England	We do not have the resources, particularly at this time, to assess all 126 potential sites for their potential impact on the historic environment. However, we are comforted by the commitments in paragraph 9.18 to further evidence-gathering, including the detailed assessment of individual sites against the refined policy approach including *Sustainability Appraisal* of individual sites. This further assessment should include the likely and potential impact of the development of a particular site on the significance of known and potential heritage assets (designated and non-designated) and, for those sites within the Green Belt, the contribution of the proposed site to the fourth purpose of Green Belts (to preserve the setting and special character of historic towns}. We are pleased to note the acknowledgement of the need to consider the effect on the Conservation Area for some of the sites.	Noted. Individual site assessments took account of historic assets, e.g., conservation areas/ listed buildings when considering whether or not progress forward to the next stage. For instance HELAA site 399 – Land to the rear of Church Cottage, Church Way was not allocated as there was unlikely to be development potential without harm to the conservation area.

Appendix 2 – Criteria used for assessing sites

These criteria have been modified since the options appraisal to reflect the actual impact that development would have on a site, i.e. no heritage features at the site = 0 rather than ++. Criteria marked * have been changed

Assessment Criteria 1: Vehicle access

Decision-making criteria: Is it possible to achieve vehicle access to the site?

7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved? **Red score = site rejected at stage 2**	++	Vehicle access to the site already exists.
		+	● The site adjoins an existing road. ● Access via adjoining land has been arranged. ● Vehicle access exists but is likely to require improvements.
		-	New vehicle access is required but possible
		--	It is not possible to create vehicle access.
		I	Vehicle access via adjoining land would need to be negotiated.

Assessment Criteria 2: Accessibility: walking and cycling

Decision-making criteria: Will the site encourage walking and cycling?

2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	++	The site is located within the city centre/a district centre and is therefore highly accessible by walking and cycling.
		+	The site is within/adjoins the urban area with existing pedestrian and cycle connections.
		-	● The site is located in an area where surrounding roads are narrow without pavements, making walking and cycling more difficult. ● Improved walking and cycling connections are likely to be required.
		I	● Pedestrian and cycle access via adjoining land would need to be negotiated. ● Larger site on the edge of the urban area which would likely require the creation of new pedestrian/cycle connections.

Assessment Criteria 3: Accessibility: public transport (bus)

Decision-making criteria: Will the site encourage use of public transport?

2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	++	Less than 10 minute walk (800m) to the nearest bus stop.
		-	More than 10 minute walk (800m) to the nearest bus stop.
		I	● Larger site on the edge of the urban area which would likely require the creation of new bus stops. ● Pedestrian and cycle access via adjoining land would need to be negotiated to enable access to bus stops.

Assessment Criteria 4: Accessibility: public transport (train)

Decision-making criteria: Will the site encourage use of public transport

2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station	++	Less than 10 minute walk (800m) to the nearest train station.
		+	10-20 minute walk (800 – 1600m) to the nearest train station.
		-	More than 20 minute walk (1600m) to the nearest train station.
		I	**Sites in Littlemore, Northfield Brook, Blackbird Leys, Lye Valley and Cowley wards** = Potential to be within walking

			distance of new Cowley branch line station if this is delivered during the plan period.

Assessment Criteria 5: Flood risk

Decision-making criteria: Is development suitable given the worst flood zone of the site?

1) Flooding 13) Climate Change	**Flood Risk**	0	*The worst flood zone is flood zone 1 or 2.
		-	The worst flood zone is flood zone 3a
		--	The worst flood zone is flood zone 3b

Assessment Criteria 6: Topography

Decision-making criteria: Do the physical features of the site make it suitable for development?

9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	0	*No significant physical features identified.
		-	*Trees/bodies of water cover less than 50% of the site. Gradual change in ground level.
		--	*Trees/bodies of water cover more than 50% of the site. Changes in ground level may affect the ability to develop some parts of the site
		?	Further information required to make an assessment.

Assessment Criteria 7: Contamination

Decision-making criteria: Are there potential issues with land contamination on the site?

4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	0	*Current land use suggests that land contamination issues are unlikely.
		-	Land previously used as petrol station/landfill. Some land contamination issues likely.
		?	Further information required to make an assessment.

Assessment Criteria 8: Air Quality

Decision-making criteria: Is the site within an Air Quality Management Area?

4) Human Health 11) Transport, Air	**Air Quality** Is the site within an Air Quality Management Area?	-	The Air Quality Management Area covers the entire city of Oxford. Therefore all sites will fall within this area.

Assessment Criteria 9: Neighbouring Land Uses

Decision-making criteria: Would neighbouring land uses be impacted by, or impact on, potential development?

4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	0	*No issues identified.
		-	The site adjoins a railway line/ring road/large scale industrial use. Mitigation may be required to minimise impacts.
		I	The site adjoins a cemetery/ school/ residential dwellings/public open space. Design sensitivity required.

Assessment Criteria 10: Distance to nearest primary school

Decision-making criteria: Is the site within a 10 minute walk of the closest primary school?

2) Vibrant Communities 6) Education	**Distance to nearest primary School**	+	The nearest primary school is within 800m.
		-	The nearest primary school is more than 800m away.
		I	Larger site where residential development could include the

7) Essential Services/Facilities 11) Transport, Air			delivery of a primary school.

Assessment Criteria 11: Distance to nearest GP surgery

Decision-making criteria: Is the site within a 10 minute walk of the closest GP surgery?

2) Vibrant Communities 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	+	The nearest GP surgery is within 800m.
		-	The nearest GP surgery is more than 800m away.

Assessment Criteria 12: Regeneration

Decision-making criteria: Will development of the site improve employment opportunities and access to services and facilities for people in the most deprived areas?

2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	+	The site is within one of the most deprived areas of Oxford. There is potential for development to support wider regeneration aims.
		0	The site is not within one of the most deprived areas of Oxford.

Assessment Criteria 13: Land Type

Decision-making criteria: Would development of the site make use of previously developed land/buildings?

2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	++	Previously developed land. Development could help to make an efficient use of land.
		-	Greenfield site.
		I	Mixed greenfield/brownfield site. Impact would depend on design and layout of development.

Assessment Criteria 14: Townscape/Landscape Character

Decision-making criteria: Will townscape and landscape quality be preserved?

2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	++	The site is brownfield as is currently vacant/in a poor state of repair. Development could improve the site's contribution to the character of the area.
		0	The site is not particularly sensitive in terms of character.
		-	The site has been identified as being of particular significance to a landscape character area/conservation area and development may cause harm.
		--	The site has been identified in the conservation area appraisal as being of particular significance to a conservation area and any development may cause harm to the character of the area.
		I	The site is within/adjoins a conservation area. Impact of development on the character of the area would depend on design.

Assessment Criteria 15: Heritage assets

Decision-making criteria: Does the site contain any historical or archaeological features?

2) Vibrant Communities 10) Urban Design	**Heritage assets** Does the site include a listed building or fall	0	*The site is not within close proximity of a listed building, is not listed on the Oxford Heritage Asset Register and is outside of the City Centre Archaeological Area.

& Heritage 15) Sustainable Tourism	within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	-	The site is within the City Centre Archaeological Area and therefore has potential for archaeological interest.
		--	Any development on the site would be likely to cause harm to a listed building and/or its setting.
		I	The impact of development on a listed building/ local heritage asset would depend on design.

Assessment Criteria 16: Biological/Geological importance

Decision-making criteria: Would development of the site protect and enhance existing flora, fauna and habitats?

8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value?	0	*No part of the site has been designated for its biodiversity value.
		-	Part of the site is designated for its biodiversity importance (SSSI, LWS, SLINC).
		--	The whole site is designated for its biodiversity importance and any development would cause harm (LWS, SLINC).
		I	The site adjoins an SAC, SSSI, LWS or SLINC. Any impacts of development would need to be carefully considered.

Assessment Criteria 17: Green Infrastructure

Decision-making criteria: Would development of the site impact on the provision of green infrastructure and public open space?

1) Flooding 2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage	**Green Infrastructure** Is the site identified as requiring protection as part of Oxford's green infrastructure network? **Red score = site rejected**	0	Brownfield site, or greenfield site that has not been identified for protection as green infrastructure.
		--	The site has been identified as being of high green infrastructure value and any development would cause harm to Oxford's green infrastructure network.

Appendix 3 - Appraisal of draft Local Plan policies

To avoid unnecessary blank appraisal rows, only impacts where there is a link between the policy and the SA objective are included below. Mitigation measures are listed only where suggestions have been made (i.e. there are no blank mitigation rows).

2. ECONOMY

E1. Employment sites

(No direct links for sustainability objectives 1, 6, 8, 10, 12, 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	Allowing modernization and intensification will help to improve efficiency of land-use, and layout. Introducing residential uses could offer people the opportunity to live close to work, although they may suffer a lack of other day to day services, and it's less likely there will be vibrant communities if the area remains primarily employment.
3. Housing	+
	Policy is likely to have a limited but positive effect on delivery of housing, provided that it can be accommodated on sites whilst retaining the employment. Unlikely to offer the mix and variety of units to suit all groups.
4. Human Health	I
	Residential development on these sites may not be close to healthcare facilities, sports facilities or other community facilities, or it may be close to incompatible uses.
5. Poverty, Social Exclusion and Inequality	+
	This policy primarily protects employment use which provides jobs and contributes to the economy. It could enable better access to housing for some employees, which would need to be carefully balanced to ensure it is a wide range and helps to overcome inequalities, and also to ensure no loss of employment.
7. Essential services and facilities	I
	New residents may lack day to day services if the area remains primarily employment.
9. Biodiversity	I
	Modernisation may present opportunity for enhancement of biodiversity eg green walls, bird boxes, roof top gardens.
11. Transport, Air	+/-
	Intensifying development at existing employment sites (particularly those in the Eastern Arc) could increase congestion, and therefore worsen air quality in these areas. However there are also likely to be positive impact of intensification as it could increase the likelihood of viable public transport routes. This is also likely to help support work-place travel plans which reduce car use, eg the Science Transit Shuttle which currently links the key science areas. Allowing some housing may help to reduce peak hour congestion, particularly on sites around the ring road, although may increase congestion elsewhere.

Sustainability Objective	SA assessment
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	I
	Modernisation may present opportunity for enhancement of sustainability measures, such as introducing renewable energy. Retaining a cluster of employment uses may offer opportunities to invest in shared technologies eg onsite CHP
14. Economy and employment	0
	The policy seeks no net loss of employment floorspace, so jobs and economic growth should not decline. This option may limit the scope for continued economic growth. However, lack of housing is one of the biggest factors curtailing economic growth, and this option helps to deal with this problem. May also have secondary impacts if residential starts to prejudice the employment uses.
Impact on adjacent authorities	+
	Supporting job growth in Oxford, particularly high-tech jobs, is part of the regional and national economic plan. It helps to support the economy of not only Oxfordshire (and adjacent authorities) as a whole, but the Oxford-Cambridge 'knowledge arc' is a major contributor to the national economy.
Mitigation meas April 18	Add a requirement that any housing on employment sites must fulfil the plan's other requirements, e.g. good access, not adjacent to noisy uses etc?
Changes April – Aug 18	Minor changes only; no changes to the SA findings

E2. Teaching and research

(No direct links for sustainability objectives 1, 5, 8-10, 12, 13)

Sustainability Objective	SA assessment
2. Vibrant Communities	I
	This policy will continue to ensure a very wide range of uses in the city centre and Headington, including a high proportion of students. However it could also be seen as disruptive to the community, and could reduce the community mix because of the limited space for other uses. Continued use of hospitals at their current sites will ensure that the communities of Oxford have easy access to their healthcare needs due to the fairly central location of the hospitals. However the concentration and heavy presence of medical facilities in Headington has affected the local distinctiveness of the area.
3. Housing	+
	The impact of further growth of the universities is linked to provision of more student or staff accommodation. Supporting hospital growth will make housing in areas in which the hospitals are concentrated very desirable which will drive up house prices and unaffordability in Oxford.
4. Human Health	0
	Retention of the hospitals in Oxford will ensure continued easy accessibility to extensive healthcare facilities.
6. Education	+
	This policy helps to support the University of Oxford and Oxford Brookes University. It also allows easy access to hospitals for students

Sustainability Objective	SA assessment
	studying medicine.
7. Essential services and facilities	+
	This policy will ensure the continued provision of extensive healthcare facilities which are easily accessible to residents of Oxford
11. Transport, Air	+/-
	The concentration of University of Oxford activities in the central area means there is easy access between different parts on foot or by bike. Other areas are also easily accessible by these modes or public transport. The city centre also has a range of other facilities that are likely to be required, reducing the need to travel. The majority of Oxford Brookes sites are in Headington, which is easily accessible from around Oxford. The proximity of many halls of residence to the main campus minimises journeys and means foot and bicycle can be the main modes of travel. Growth of the hospitals in Headington will cause increased traffic to the existing hospital sites as well as further strain existing hospital parking sites. However, there is adequate public transit, through buses and park and rides, to manage these effects
14. Economy and employment	+
	This will support the University of Oxford and Oxford Brookes University, which are important employers and have a vital role in the economy, especially the knowledge economy, and which also educate a potential future workforce. It will also create more medical and research jobs in the area which will add to Oxford's economy, which is consistent with Oxford's Strategic Economic Plan.
15. Sustainable Tourism	0
	The presence of the University of Oxford in the centre of Oxford, where it cares for and maintains its historic buildings, is a vital component of Oxford's attraction to visitors, and this policy will help to maintain it.
Impact on adjacent authorities	0
	This would help to maintain both Oxfordshire's international academic reputation and its excellent health care facilities.
Mitigation meas April 18	The policy on linking the delivery of new university academic facilities to the delivery of university provided residential accommodation helps to reduce the negative impact of students on housing provision.
Changes April – Aug 18	Removal of the requirement that development will demonstrate high quality urban design and have no unacceptable impact on the significance of heritage assets. Insertion of a requirement that expansion of the universities will be linked to the provision of student accommodation: this changed the housing criterion from I to +.

E3. New academic or administrative floorspace for private colleges / language schools

(No direct links for sustainability objectives 1, 4, 5, 7-13, 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy protects the identity and distinctiveness of existing communities by ensuring that any growth in college facilities

Sustainability Objective	SA assessment
	contributes to Oxford's economy. There will still be plenty of students to help ensure diversity.
3. Housing	0
	This should prevent the encroachment of private colleges on residential units or sites suitable for housing, which will protect the overall housing supply.
6. Education	0
	This policy could limit the educational offer of Oxford. However, the Universities contribute so much to education that this could also have a beneficial impact by reducing competition with the Universities (as long as mutually beneficial arrangements remain in place, such as use of university accommodation by summer schools).
14. Economy and employment	+
	This policy ensures that any growth in colleges and language schools clearly supports Oxford's economic growth.
Impact on adjacent authorities	No significant impact
Mitigation meas April 18	Ensure that any growth in private colleges leads to no net loss of housing.
Changes April – Aug 18	Policy wording added to considerably constrain further expansion by private colleges and language schools. This will help to ensure that there is no loss of office or residential accommodation. No change to appraisal findings, but provides more certainty of effective implementation.

E4. Securing opportunities for local employment, training and businesses

(No direct links for sustainability objectives 1, 3-4, 7-10, 12, 15)

Sustainability Objective	SA assessment
2. Vibrant communities	+
	This policy helps to support vibrant communities by helping to provide local jobs, the Oxford Living Wage, and good links between developers and local companies
5. Poverty, Social Exclusion and Inequality	++
	This policy helps to support training and skills attainment, reduce disparities across Oxford, and local companies.
6. Education	+
	This supports local training/employment opportunities, including apprenticeships.
11. Transport, air	+
	By helping to supply labour and materials for new developments more locally, the policy helps to reduce the need to travel
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	Providing local labour/training opportunities and procuring construction material locally where possible would help to reduce road transport for people and materials, and thereby greenhouse gas emissions.
14. Economy and employment	++
	Helps to support training and skills attainment in Oxford; provide a range of jobs accessible to local people; and support more businesses

Sustainability Objective	SA assessment
	and the local economy. This is particularly important for supporting lower-skilled jobs.
Impact on adjacent authorities	+
	Supporting local employment for local people would help to reduce the need to travel to jobs further away, and thus reduce congestion in adjacent authorities.
Mitigation meas April 18	This policy was comprehensively rewritten in summer 2018. Original suggested mitigation measure was that the policy should clarify that employers need to provide training and employment to local residents… and clarify whether this means Oxford residents, or residents within a certain distance of the development.
Changes April – Aug 18	The policy was comprehensively rewritten in summer 2018, and the new policy is much more positive from an SA perspective. The appraisal above is for the new policy. New additions to the policy is the list of requirements a)-i), notably the reference to the Oxford Living Wage, procurement of construction materials locally, educational opportunities; and overall the lowering of the threshold when this policy applies.

3. HOUSING

H1. The scale of new housing provision

Sustainability Objective	SA assessment
1. Flooding	-
	This capacity based policy helps to protect Oxford's important green spaces and higher flood risk areas, limiting negative impacts, but some housing sites would still be prone to flooding or could exacerbate flooding elsewhere. There is the potential for negative impacts to be mitigated through sustainable drainage systems.
2. Vibrant Communities	+/-
	This policy does not meet the entire Objectively Assessed Need (OAN) for Oxford. However it aims to maintain local distinctiveness and sense of place.
3. Housing	+
	This policy delivers as much housing as Oxford can reasonably supply whilst still maintaining its sense of place and high quality living environment. Working with neighbouring authorities will help address housing need.
4. Human Health	I
	This policy delivers as much housing as Oxford can reasonably supply whilst still maintaining its sense of place and high quality living environment including human health.
5. Poverty, Social Exclusion and Inequality	I
	The policy does not meet the entire OAN. Housing in Oxford is likely to continue to become more expensive, and less affordable for people on low incomes. However the policy on affordable housing works jointly with this policy to help provide homes for low income households.

Sustainability Objective	SA assessment
6. Education	I
	This policy adds some pressure on existing schools but it is likely that the additional school capacity requirements could be met through additions to existing school sites.
7. Essential services and facilities	0
	This policy, which limits the number of new homes, would help to ensure that demand for services and facilities is met. Pressure on existing services and facilities would be likely to remain constant.
8. Green Spaces, Open Air Sports and Leisure	-
	This policy, in practice, would lead to the loss of some green spaces. However it protects green spaces more than other, higher growth options.
9. Biodiversity	-
	This policy, in practice, would lead to the loss of some green spaces and so some biodiversity. However it protects green spaces more than other, higher growth options. Some biodiversity improvements may also be possible.
10. Urban Design and Heritage	+/-
	Delivering a lower amount of residential development based on capacity and the consideration of other policy aims will help to conserve and enhance Oxford's heritage and character. It will also provide policy protection for Oxford's unique character, sense of place, the setting of heritage assets and historic views.
11. Transport, Air	+/-
	Relying on neighbouring authorities to assist in the delivery of Oxford's is likely to result in an increase in in-commuting to the city depending on the locations of the new houses. Those houses that are delivered in the city are likely to be in sustainable locations close to essential services and facilities.
12. Water Quality, Quantity and soil	-
	Delivering this amount of residential development will increase the need for water in line with the predictions. Thames Water considers that there will be a supply side deficit from 2019 (on current housing projections) that will continue to worsen without mitigation throughout the plan period.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+/-
	This policy is likely to increase the volume of residential waste in the city. For a truly neutral impact on climate change, the housing would need to be built to standards that exceed the current Building Regulations, and would need to generate a significant amount of renewable energy on-site. Policies elsewhere in the plan support sustainable design and construction, which will minimize this negative impacts.
14. Economy and employment	+
	This policy will help to address one of the key barriers to economic growth – the lack of affordable housing. It also means that key employment sites important to the knowledge economy, and Oxford's local economy will be protected. This scores positively as it will both increase affordable housing (barrier to economic growth) and protect key employment sites and allow for appropriate employment growth.

Sustainability Objective	SA assessment
15. Sustainable Tourism	
	No direct link
Impact on adjacent authorities	--
	This policy means that adjacent local authorities become responsible for providing for much of Oxford's objectively assessed need. Additional unmet housing need will be addressed through the preparation of the Joint Spatial Plan.
Mitigation meas April 18	This policy is the most feasible and sustainable of the reasonable options available. Providing further housing in Oxford would be difficult in practice, would negatively affect the quality of life of its residents, and would harm the environment. Providing less housing in Oxford would not help to provide for Objectively Assessed Need, and would have inappropriately negative impacts on adjacent authorities.
Changes April – Aug 18	Minor wording changes and agreement on exact housing numbers. No change to appraisal findings.
Further changes Sep 18	Reference to housing provided by adjacent local authorities removed. No change to appraisal findings.

H2. Delivering affordable housing

(No direct links for sustainability objectives 1, 6-10, 12-13, 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	Provision of an adequate number of affordable homes allows residents to live near their jobs and families. This policy strengthens the existing Core Strategy policy, and so should deliver more affordable homes.
3. Housing	++
	This policy helps to deliver affordable housing to meet local needs. It is more exigent than the current policy.
4. Human Health	0
	Provision of adequate housing helps to support human health. However the increase in affordable housing over the status quo is probably not great enough to lead to significant additional health benefits.
5. Poverty, Social Exclusion and Inequality	++
	Provision of an adequate number of affordable homes helps to support people who might otherwise live in substandard homes or have to travel long distances to work. This helps to reduce social exclusion. This policy should significantly support this.
11. Transport, air	0
	In the absence of this policy, people who work in Oxford and/or have families there might need to live outside Oxford and travel in, increasing vehicle movements. However the policy is likely to provide only a limited change over the status quo.
14. Economy and employment	+
	This policy helps to provide housing that accessible to local jobs. The

Sustainability Objective	SA assessment
	high proportion of affordable housing required is supported by viability studies and allows flexibility in the case of true non-viability.
Impact on adjacent authorities	+ Provision of an adequate number of affordable homes will help to reduce commuting, and reduce the need for neighbouring authorities to provide such homes.
Changes April – Aug 18	This policy was not appraised in April 2018.
Changes Sep 18	Reference to contributions for affordable housing by other non-self-contained residential developments removed. No change to the appraisal findings.

H3. Employer linked affordable housing

(No direct links for sustainability objectives 1, 8-13, 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	Would help to support mixed and vibrant communities by ensuring that key worker housing is available for a range of employees.
3. Housing	++
	Would help to meet the housing needs of a wider range of key workers including the lowest paid who are likely to encounter the most difficulties in trying to access housing in Oxford otherwise. The requirement for the housing to remain affordable in perpetuity, and for 40% of housing to be retained for social rent could support non key workers in the longer term.
4. Human Health	+
	Positive impact on the health and wellbeing of a range of key workers who would be able to access homes near to where they work.
5. Poverty, Social Exclusion and Inequality	+
	Would help to meet the housing needs of a wider range of key workers, including the lowest paid, helping to reduce disparities.
6. Education	0
	Would help to maintain the delivery of educational services by helping a wider range of key workers, including the lowest paid, to access homes in Oxford.
7. Essential services and facilities	0
	Would help to maintain the delivery of essential services by helping a wider range of key workers, including the lowest paid, to access homes in Oxford.
14. Economy and employment	+
	Would help to meet the housing needs of a range of key workers, helping larger employers to recruit and retain staff.
Impact on adjacent authorities	+
	Helps to provide housing in Oxford for people who would otherwise probably be living in adjacent authorities and commuting in.
Mitigation meas April 18	The policy implies that the housing should all be for rent (rather than to buy) but is not explicit about this. Specify whether the housing should be for rent or to buy?
Changes April – August 18	The policy now specifies that the housing is for rent; that an affordable housing approach needs to be agreed with the Council; that 40% of

Sustainability Objective	SA assessment
	the housing will be for people on Oxford's housing register; and that if the employer no longer needs the housing, 50% must be managed by a Registered Provider. This changes the housing score from + to ++.

H4. Mix of dwelling sizes

(No direct links for sustainability objectives 1, 4, 6, 8, 9, 12, 13, 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	Specifying a housing mix based on need will help to support mixed and balanced communities. Whilst not specifying minimum densities could result in a less efficient use of land in some cases, in some parts of the city the market is likely to favour higher density development to maximise profit returns. Providing a specified housing mix for developments of 25+ homes will help to ensure that housing is provided for a range of population groups throughout the city.
3. Housing	+
	This policy will help to deliver a mix of dwellings to respond to the needs of a range of groups, as documented in the Strategic Housing Market Assessment.
5. Poverty, Social Exclusion and Inequality	+
	This policy will help to deliver a mix of affordable dwellings to respond to needs, as documented in the Strategic Housing Market Assessment.
7. Essential services and facilities	I
	The impact of this policy depends on the densities of development delivered. In some parts of the city the market is likely to favour higher density development to maximise profit returns. This would increase the viability of delivering new/additional /improved essential services and facilities that could benefit communities more widely.
10. Urban Design and Heritage	0
	This policy, which does not set a minimum density, provides flexibility for developments to respond to local character and to consider impacts on the setting of heritage assets where appropriate.
11. Transport, Air	I
	In some parts of the city the market is likely to favour higher density development to maximise profit returns. Higher density, large scale residential developments would enable more local journeys to be made by walking and cycling. However, the majority of residential sites in Oxford are small scale and therefore the ability to travel by walking, cycling and public transport would depend on site proximity to local services/facilities and public transport routes. Further out of the city, families occupying larger houses may be more inclined to use a private car than public transport. Equally car free development in the City centre may be better suited to 1- and 2-bed dwellings occupied by young professionals.
14. Economy and employment	+
	Oxford's housing need is affecting businesses' ability to recruit and retain staff. This policy helps to ensure that a mix of housing is

Sustainability Objective	SA assessment
	delivered to help meet needs.
Impact on adjacent authorities	+
	The policy aims to provide the types of housing to best meet need in Oxford. This should help to reduce housing need in adjacent authorities.
Mitigation meas April 18	The policy says nothing about density – should it? The draft NPPF 2018 states that "Where there is an existing or anticipated shortage of land for meeting identified housing need… plans should contain policies to optimize the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport." (para 123)
Changes April – August 18	The new version of the policy no longer suggests a mix of unit sizes for the market element. It makes the mix of affordable unit sizes relevant only outside the city/district centres, and also applicable to sites of 0.5ha or greater. None of these changes affect the scoring.

H5. Development involving loss of dwellings

This policy essentially prevents the loss of buildings, i.e. maintains the status quo. No significant impacts on sustainability objectives.

Sustainability Objective	SA assessment
Impact on adjacent authorities	+
	The policy maximises the number of homes provided in Oxford, thus minimising the number that adjacent authorities need to provide
Mitigation meas April 18	The wording of the policy is confusing. Remove "where" at d), e) and f)?
Changes April – August 18	The changes mostly involve moving sentences around to make the requirements clearer. A requirement has been added to require the unit to have the potential to be turned back into a residential unit in the future. No changes to the policy scoring.

H6. Houses in Multiple Occupation

This policy is almost the same as Policy HP7 in the Sites and Housing Plan, so it is a continuation of 'business as usual'. (No direct links for sustainability objectives 1, 4-9, and 11-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy aims to contain the large numbers of HMOs, helping to keep communities mixed and vibrant.
3. Housing	+/-
	This policy continues to provide a similar level of control over HMOs in the housing market and provide a degree of protection to family homes. It could reduce the number of bed spaces provided per dwelling.
10. Urban Design and Heritage	0
	This policy will continue the existing approach of ensuring that an

Sustainability Objective	SA assessment
	over-concentration of HMOs does not impact on the character of residential areas in the city.
Impact on adjacent authorities	0 No significant impact
Mitigation meas April 18	
Changes April – August 18	Minor wording changes reducing the flexibility of application of this policy. No changes to the scoring.

H7. Community-led and self-build housing

The impacts of this policy will be limited because of the small quantity of community-led and self-build housing likely to come forward. Essentially self-build housing would substitute for a small proportion of intermediate housing. (Either no direct links or the impact depends on the location of the development for sustainability objectives 1, 4, 6-9, and 11-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy offers the possibility of community-led housing because this helps to bring community cohesion. However the impact will be minimal because of the small number likely to come forward and because the policy supports rather than requires this.
3. Housing	0
	This policy is unlikely to lead to an increase in the quantity of housing provided, although it caters to a limited but specific demand for housing.
5. Poverty, Social Exclusion and Inequality	0
	The policy would provide self-build housing as intermediate housing, and aims for the plots to remain affordable in perpetuity.
10. Urban Design and Heritage	0
	Community housing and self-build housing is likely to provide only a small proportion of Oxford's housing, and will need to achieve good design as per other plan policies.
Impact on adjacent authorities	No impact
Mitigation meas April 18	The policy says almost nothing about community-led housing. Should it say anything more?
Changes April – August 18	The policy now assumes that self-build housing will be market housing rather than affordable housing. It also states that 5% of the area (instead of 'up to 20%') for sites of 50+ units will be made available as self-build plots. The poverty mark is changed from + to 0 to reflect this.

H8. Provision of new student accommodation

This policy is broadly the same as Policy HP5 in the Sites and Housing Plan, so it is a continuation of 'business as usual'. Provision for student accommodation on major thoroughfares has been removed from this policy. (No direct links for sustainability objectives 1, 4, 5, 8-10, and 12-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy will continue to locate new student accommodation away

Sustainability Objective	SA assessment
	from quieter residential streets and closer to areas of activity. This aims to protect the amenity of existing residents.
3. Housing	0
	This policy will continue to ease pressure on the private rental housing market by providing student location in accessible locations.
6. Education	+
	This policy retains some control over the location of new student accommodation at certain locations in the city. This will enable the further growth of the universities in a controlled manner which would be likely to have a positive impact on education.
7. Essential services and facilities	0
	This policy provides for a planned approach which helps to maintain access to essential services and facilities.
11. Transport, Air	+
	Students that live in university provided accommodation do not usually have access to a private car, and this policy supports this. It also requires developers to prevent residents from parking anywhere in Oxford, strengthening existing requirements and supporting other transport policies. Continuing to provide new student accommodation in the city and district centres is likely to encourage walking and cycling as the majority of the University of Oxford colleges are located in the city centre (and some in North Oxford) and as Oxford Brookes is close to Headington and Cowley Road district centres there are existing walking and cycling routes.
Impact on adjacent authorities	No impact
Changes April – August 18	The new policy tightens the requirements for planning permission to 1. Full-time students enrolled for at least a year, and 2. Compliance with parking restrictions/controls. The latter has led to a change in scoring for transport, from 0 to +.
Changes Sep 18	New requirements added: 1. Developers will monitor and enforce the car-free aspects of student accommodation; and 2. A management strategy will be agreed if occupants other than students will use the student accommodation outside of term time. The first change reinforces the positive dimensions of 11 (transport, air) but does not lead to a ++: no change in the scoring.

H9. Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation

This policy is more exigent than the current policy, which sets a threshold of 3000 students living off campus for each of the colleges. (No direct links for sustainability objectives 1, 4, 5, 7-13 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	Reducing the number of students living outside of University provided accommodation is likely to result in fewer students living in shared accommodation, e.g. HMOs. It is unlikely that many of these properties would return to family housing. As such, a proportion would be likely to be occupied by other groups (e.g. young professional

Sustainability Objective	SA assessment
	workers), which may create less transient neighbourhoods with more community cohesion.
3. Housing	+
	This policy will alleviate some pressure on the housing market by reducing the threshold for students living off campus. This will also encourage the universities to continue building purpose-built accommodation.
6. Education	-
	It is unlikely that either University would be able to expand their teaching accommodation under this option without significant investment in University provided accommodation. This would be to house students that are currently living outside of University provided accommodation. This policy could thus have a significant negative impact on the growth and expansion of the two Universities.
14. Economy and employment	+/-
	This policy could significantly constrain the growth and expansion of both Universities, but it could alleviate pressure on the housing market which is a constraint to employment
Impact on adjacent authorities	No impact
Changes April – August 18	The policy has set back the date for tightening requirements from 2020 to 2022. This has not affected the scoring, although it would ease the short-term pressure on the universities.

H10. Accessible and adaptable homes

This policy implements the government's optional standards on lifetime homes. (No direct links for sustainability objectives 1-3 and 5-15)

Sustainability Objective	SA assessment
4. Human Health	+
	This policy helps to ensure that homes are provided that are suitable for the changing needs of residents as they get older, and improved facilities for wheelchair users and others who need easy access to/in their homes.
Impact on adjacent authorities	No impact
Changes April – August 18	The new policy also includes a requirement for 5% of dwellings to be wheelchair accessible. This does not change the score.

H11. Older persons and specialist and supported living accommodation

(No direct links for sustainability objectives 1 and 6-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	The policy supports accommodation for elderly persons where it will contribute positively but not significantly to the creation and maintenance of balanced communities.
3. Housing	+

Sustainability Objective	SA assessment
	The policy supports the delivery of specialist accommodation for the elderly. Because it is the older demographic who are most likely to under-occupy homes, this could also free homes for other people who need them, making good use of the existing housing stock. The policy now also includes a requirement to meet the plan's affordable housing requirements.
4. Human Health	+
	The policy supports the delivery of specialist accommodation needed by people with health problems (e.g. dementia).
5. Poverty, Social Exclusion and Inequality	+
	Improved housing for older people can help to reduce their social exclusion.
Impact on adjacent authorities	No impact
Changes April – August 18	The policy has been changed to include a requirement to meet the plan's affordable housing requirements, but is otherwise mostly the same. No changes to the policy scoring.

H12. Homes for Travelling communities

There is currently little or no demand for accommodation for Gypsy, Traveller and Travelling Showpeople in Oxford, but there is a need for new sites in wider Oxfordshire. This policy sets criteria for pitches if applications come forward. Given the very limited scale of such development expected and the criteria set by the policy, impacts on most of the sustainability objectives are expected to be minimal.

Sustainability Objective	SA assessment
3. Housing	0
	This policy provides scope to help provide accommodation for Gypsy, Traveler and Travelling Showpeople in suitable locations if and when they are proposed, but has limited impact.
Impact on adjacent authorities	No significant impact
Changes April – August 18	The policy clarifies that all of the criteria must be met, but is otherwise unchanged.
Changes Sep 18	Removal of requirement to ensure that the site provides an amenable environment for residents (which is presumably covered by the previous points and so redundant). No change to the policy scoring.

H13. Homes for boat dwellers

(Either no direct links or the impact depends on the location of the development for sustainability objectives 1-3 and 5-15)

Sustainability Objective	SA assessment
3. Housing	0
	Oxford has an acute shortage of potentially suitable sites for residential moorings in the city. This policy provides scope to help deliver moorings in suitable locations if and when they are proposed, however because few appropriate sites are likely to come forward the impact is limited.
Impact on adjacent authorities	No significant impact
Changes April – August 18	The policy changes remove the requirement for new moorings on the main river Thames to be in off-channel basis; and adds the requirement that the proposed development should not restrict other people's access and enjoyment of 'water related infrastructure facilities'. Essentially this preserves a status quo, so no change to the scoring.
Mitigation measures Aug 18	Simplify the wording of h. ("restrict the ambition for increased access to and opportunities to enjoy enhanced water related infrastructure facilities")
Changes Sep 18	Addition of final paragraph on additional visitor mooring.
Mitigation measures Sep 18	Unclear why visitor moorings have significantly fewer constraints than residential moorings: nothing about operational requirements of the waterway, biodiversity (only as covered by 'environmental damage or nuisance') access for emergency services, Green Belt constraints, use of adjacent paths etc. (This was later removed from the policy)

H14. Privacy, daylight and sunlight

This policy is broadly the same as Policy HP14 in the Sites and Housing Plan, with the additional requirements of 1. At least 20 metres between directly facing windows to habitable rooms, and 2. No planning permission granted on any development that has an overbearing effect on existing homes. (No direct links for sustainability objectives 1, 4, 5, 8-10, and 12-15)

Sustainability Objective	SA assessment
4. Human Health	+
	The policy aims to ensure that housing gets good lighting, thus protecting residents' amenity and wellbeing.
10. Urban Design and Heritage	+
	The policy aims to protect privacy and ensure good lighting for both existing and new residents. It is more exigent than the current policy.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	In a minor way, the policy would help to reduce the need for artificial lighting, but the impact is unlikely to be significant.
Impact on adjacent authorities	No impact
Mitigation meas April 18	Is there evidence for the 20m rule? If so, cite this in the policy.
Changes April – August 18	The 20m rule has been removed. Sunlight is added to privacy and

Sustainability Objective	SA assessment
	daylight. No change to the scoring.

H15. Internal space standards

Sustainability Objective	SA assessment
3. Housing	+
	This policy helps to ensure that housing is large enough to be decent and meets the needs of its residents.
4. Human Health	0
	By ensuring that room and dwelling size is adequate, this policy helps to protect human health. However it does not require an increase in room/dwelling size, so maintains the status quo.
5. Poverty, Social Exclusion and Inequality	0
	The policy helps to protect vulnerable groups who might otherwise opt for cheap but tiny rooms/accommodation.
14. Economy and employment	+/-
	It might be possible to build more accommodation/rooms if space standards were not adhered to, allowing more people to both live and work in Oxford. However it would negatively affect the quality of life (and therefore the ability to work) of residents of overly-small accommodation.
Impact on adjacent authorities	No significant impact.
Changes April – August 18	This policy was not appraised in April 2018.

H16. Outdoor amenity space

(No direct links for sustainability objectives 2, 5-8, and 10-15)

Sustainability Objective	SA assessment
1. Flooding	0
	This policy helps to minimise flood risk by increasing surface-water run-off and through the provision of permeable surfaces.
3. Housing	+/-
	The policy constrains the amount of housing that can be provided on one site because of outdoor amenity space required. However it helps to ensure that the housing provided is of good quality.
4. Human Health	+
	This policy will deliver a suitable minimum standard of private outdoor space which will protect and possibly enhance the health and well-being of residents.
9. Biodiversity	+/-
	This policy will result in developments coming forward with a minimum standard of private open space: this means that more land will be used per unit of housing. Where sites are currently brownfield, the new garden space may have a positive impact on biodiversity
Impact on adjacent authorities	-
	This policy constrains the amount of housing that can be provided on

Sustainability Objective	SA assessment
	one site because of outdoor amenity space required.
Changes April – August 18	Adds requirements for outdoor spaces for houses of 2 or more bedrooms (i.e. minimum dimension 1.5m x 3m). Otherwise virtually identical to the previous version. No change in scoring.

4. RESOURCES AND ENVIRONMENT

(4.1) Responding to climate change

(No direct links for sustainability objectives 7 and 11)

Sustainability Objective	SA assessment
1. Flooding	+
	The policy helps to reduce the risk of flooding by reducing CO_2 emissions that lead to climate change, and more directly by supporting SuDS, green spaces, green infrastructure and green roofs.
2. Vibrant Communities	+
	The policy encourages green infrastructure, protection of green spaces etc., all of which support a vibrant community.
3. Housing	+
	By making housing more resilient to climate change, notably overheating, the policy improves the comfort of housing
4. Human Health	0
	The policy aims to help reduce flooding and overheating, both of which affect human health. It also aims to protect green spaces, which are good for mental health. However it is likely to maintain rather than actively enhance human health.
5. Poverty, Social Exclusion and Inequality	+
	Buildings that are resilient to climate change will be cheaper to run. This will help to reduce fuel poverty.
8. Green Spaces, Open Air Sports and Leisure	+
	The policy helps to protect and enhance green spaces
9. Biodiversity	0
	This policy will indirectly help to protect biodiversity, for instance by optimizing the use of green and blue infrastructure. However this benefit is unlikely to be significant.
10. Urban Design and Heritage	+/-
	The policy will help to ensure that buildings are designed for, and resilient to, future conditions. Some aspects – for instance renewable energy systems and greywater collection equipment – may be incompatible with optimal urban design.
12. Water Quality, Quantity and soil	0
	The policy will help to maintain the Oxford Canal and the rivers Cherwell and Thames, although it is unlikely to significantly enhance them.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	The policy supports a reduction in CO_2 emissions, and adaptation to future climate change conditions
14. Economy and	0

Sustainability Objective	SA assessment
employment	The policy supports development that is resilient to future climate change conditions. This will prevent the need to retrofit cooling equipment, and will make working conditions more attractive. However the impact on the economy and employment is unlikely to be significant.
15. Sustainable Tourism	
	No direct impact
Impact on adjacent authorities	No impact
Mitigation meas April 18	This policy is called 'adapting' to climate change, but also includes some climate change Mitigation meas April 18, notably using renewable and low carbon energy supply systems. Either rename as 'Minimising and adapting to climate change' or remove d)?
Changes April – August 18	This policy has been changed a lot. It still promotes good building design, support of the green and blue infrastructure, and sustainable drainage. However it no longer includes reference to Oxford's 80% CO2 reduction target; resilience; reduced reliance on air conditioning; use of recyclables; urban greening/trees; or green roofs/walls. It cross-references more clearly to other policies. The scoring for this version is less positive because it is less ambitious: it has gone from ++ to +.
Changes Sep 18	Policy deleted, presumably because its requirements are covered by other policies.

RE1. Sustainable design and construction

(No direct links for sustainability objectives 2, 4, 6-8, and 14)

Sustainability Objective	SA assessment
1. Flooding	+
	This policy will help to address climate change and therefore indirectly help to reduce flooding. It also supports flood resilient construction.
3. Housing	I
	This will help to ensure housing has reduced energy and water requirements and running costs. However, it could entail additional up-front costs and therefore impact on viability. The cost of renewable energy technologies is likely to fall with increased uptake, so in the longer term the increased target will not have a commensurate increased cost.
5. Poverty, Social Exclusion and Inequality	+
	This will result in properties that are cheaper to run with reduced heating and water bills, so would help to reduce poverty and inequality.
9. Biodiversity	+
	The policy specifically requires measures to enhance biodiversity value. By reducing carbon emissions and minimising water use etc., it also indirectly benefits biodiversity.
10. Urban Design and Heritage	I
	The design and location of any community energy scheme and renewable energy installations would need careful control to prevent

Sustainability Objective	SA assessment
	them from having a negative impact on urban design and heritage.
11. Transport, Air	I
	Some renewable energy sources, including heat networks, can have a negative effect on local air quality. However the choice of technology could also improve local air quality.
12. Water Quality, Quantity and soil	+/-
	This policy helps to ensure that water consumption is minimized compared to 'business as usual', although overall water use in the city is expected to increase due to an increasing population.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	++
	This policy will significantly help to minimize carbon emissions. The requirement to produce an Energy Statement will mean that developers will need to learn about how to reduce carbon emissions; heat networks will directly reduce emissions. The use of recycled materials will reduce embodied energy.
15. Economy and employment	I
	This will help to ensure non-residential development has reduced energy requirements and running costs. However, it could entail additional costs and therefore impact on viability. The cost of renewable energy technologies is likely to fall with increased uptake, so in the longer term the increased target will not have a commensurate increased cost.
Impact on adjacent authorities	+
	This policy will help to reduce climate change and water use, and so have a globally positive effect
Mitigation meas April 18	The policy includes no real requirements for improving the sustainability of buildings are they are being retrofitted. Should this be stronger? The issues/options document had several suggestions. Does the policy need to specify how close to a heat network a development will need to be to be expected to hook up to it? Does the heat network requirement apply to residential or just non-residential development? Will there be reference to Oxford's Natural Resource Impact Analysis SPD? Does this policy replace it and, if so, does it provide a similar degree of rigour? If not, will a similar test of sustainability be included in the plan?
Changes April – August 18	The first part of the policy is new, i.e. need to demonstrate incorporation of sustainable design and construction principles a)-g). The requirement for an Energy Statement for 5+ dwellings is also new. More information is provided on the Display Energy Certificate. Reference to retrofitting has been removed. This policy version more explicitly supports biodiversity, so score has improved from 0 to +.
Mitigation meas Aug 18	Reduce overlap with (former) policy 4.1.
Changes September 18	Former policy 4.1 deleted. Final paragraph added about water efficiency of non-residential development. No change to scores.

RE2. Efficient use of land

(No direct links for sustainability objectives 1, 4, 6, 8-10, 12 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	Making best use of land would help to deliver more homes, which supports vibrant communities. However it is unlikely to have a significant impact.
3. Housing	++
	Making best use of land would deliver more homes in a given area
5. Poverty, Social Exclusion and Inequality	+
	Delivery of more homes would help address inequalities
7. Essential services and facilities	I
	Making best use of land would enable delivery of services and facilities with the local community required to support them. However it could also over-stretch services.
10. Urban Design and Heritage	I
	Dense development has the potential to have a negative impact on urban design. However the application of design development guidance should minimize this, and the policy states that the scale of development should confirm to other plan policies.
11. Transport, Air	+
	Making best use of land would support sustainable travel choices
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	Making best use of land would make efficient use of resources
14. Economy and employment	+
	Making best use of land would deliver more jobs in a given area
Impact on adjacent authorities	+
	Maximises the amount of housing provided in Oxford, minimising the need for Oxford's objectively assessed need to be provided by adjacent authorities
Mitigation meas April 18	The draft NPPF 2018 states at para. 123a) that "*plans… should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate*"… so consider including minimum density standards. If infrastructure could be at capacity, limit the number of new homes to what can be supported by infrastructure, or provided through new infrastructure?
Changes April – August 18	Reference to greenfield sites has been deleted. The final statement about high-density development being expected in the city/district centres and delivery of 100 dwellings per hectare is new. The scoring remains unchanged.
Changes Sep 18	Reference to delivery of 100 dwellings per hectare removed. The scoring remains unchanged.

RE3. Flood risk management

(No direct links for sustainability objectives 2, 5, 10-11, 14-15)

Sustainability Objective	SA assessment
1. Flooding	0
	This policy is designed to reduce the risk of flooding and its impacts on people, the economy and the environment. Although it allows some development on previously developed land in flood zone 3b, this development would be 'flooding-neutral'. The flood risk assessments for other flood zones would set out how flood risk would be avoided, managed and mitigated; this should ensure that water run-off is sustainably managed, and that the risk of flooding is not increased and where possible reduced. The policy continues the existing approach to flooding, and aims to not increase flooding, so the impact is neutral.
3. Housing	+
	Using the sequential test (the guidance approach of both the existing and the draft 2018 NPPF) will ensure that development is directed towards land in flood zone 1 where possible; this will contribute to ensuring that new housing is designed sustainably and is adaptable to the changing climate. It may mean however that some sites do not come forward for housing that might be suitable subject to high standards of Mitigation meas April 18. Allowing flooding-neutral development on previously developed land will enable the delivery of more housing than would be the case under 'business as usual'. Flood risk assessments will ensure that any new housing is designed sustainably with regard to flooding, and is able to meet the changing climate.
4. Human Health	0
	The policy will help to protect residents from the negative impacts of flooding on their physical and mental health and wellbeing. Concern over flooding and the impacts of flood events could have a negative impact on health, particularly by increasing stress. Allowing flooding-neutral development on previously developed land will allow for more new homes, and access to housing is an important indicator of health. Flood risk assessment will help to ensure that people's health is not put at additional risk from flooding.
6. Education	0
	The policy would direct educational development to areas of low flood risk, but may allow school development on sites where it would be otherwise prevented (i.e. previously developed land prone to flooding). The impact is unlikely to be significant.
7. Essential services and facilities	I
	Balances the need for new development in areas that are already well served by essential services and facilities, with the flood risks to those developments
8. Green Spaces, Open Air Sports and Leisure	0
	Allowing some use of previously developed sites is likely to reduce the need to use greenfield sites, so keeping impacts neutral
9. Biodiversity	0
	Following of the sequential tests and preparation of flood risk assessments will help to minimise the risk of increased flooding, which will prevent negative impacts on biodiversity. Greater use of brownfield sites for new development is likely to reduce the

Sustainability Objective	SA assessment
	need to use greenfield sites, helping to prevent development that may impact on biodiversity.
12. Water Quality, Quantity and soil	0
	This should help to maintain and where possible improve water quality by reducing or not increasing run-off.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	This policy ensures that development is located in areas where it will not be negatively impacted by flooding caused by climate change, and that flood risk assessments are prepared that demonstrate the measures are in place to manage flood risk.
Impact on adjacent authorities	No significant impact
Changes April – August 18	The policy now gives further information about the suitability of development within flood zones 1/2/3; states that minor householder extensions are assessed on a case-by-case basis rather than requiring a site-specific FRA; and provides information about how development sites within the area defended by the Oxford Alleviation Scheme should be treated.
Mitigation meas Aug 18	It is unclear how the Oxford Flood Alleviation Scheme will affect housing/employment land – will some land now be developable that previously wasn't? Does this need to be clarified?
Changes September 18	Addition of paragraph on new development being directed towards areas of low flood risk. No change in scoring.

RE4. Sustainable urban drainage

(Either no direct links or the impact depends on the location of the development for sustainability objectives 2, 5-6, 8 11 and 14-15)

Sustainability Objective	SA assessment
1. Flooding	+
	This policy would add additional protection from flooding, as it gives clear guidance on the kind of SuDS that would provide the greatest level of protection, and have the greatest impact on reducing the risk of flooding.
3. Housing	0
	Additional requirements for and advice on SuDS would help protect new and existing housing from the effects of flooding, so helping to prevent a worsening of flooding.
4. Human Health	0
	Additional requirements for and advice on SuDS would help ensure that people's health is not put at additional risk from flooding.
7. Essential services and facilities	+
	The 'SuDS hierarchy' in the policy helps to ensure that sewers are not overloaded
9. Biodiversity	0
	This policy helps ensure that biodiversity is not put at additional risk from flooding.
10. Urban Design and Heritage	+
	SuDS can provide attractive park-type settings for new developments

Sustainability Objective	SA assessment
12. Water Quality, Quantity and soil	+
	The policy will ensure that problems caused by overwhelmed sewer capacity are minimized, and the drainage hierarchy may lead to greater increase in the storage and use of greywater. It also provides further protection for the quality of the groundwater, and groundwater recharge.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	This policy helps ensure that additional risk from flooding is avoided.
Impact on adjacent authorities	No significant impact
Mitigation meas April 18	Can/should the policy push the drainage hierarchy more forcefully, i.e. storage of rainwater is the preferred option unless it can be shown to not be feasible?
Changes April – August 18	An entire section on surface and groundwater flow and groundwater recharge was added to the policy, with particular reference to Lye Valley SSSI and Oxford Meadows SAC. Although the scoring for this policy has not changed, it provides stronger protection especially for water quality and biodiversity.

RE5. Health, wellbeing and health impact assessment

(No direct links for sustainability objectives 1, 3, 6-7, 9-10 and 12-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	This policy will provide a documented assessment of the health impacts of a proposed development and its effects on vibrant communities
4. Human Health	+
	This policy will provide a documented assessment of the health impacts of a proposed development.
5. Poverty, Social Exclusion and Inequality	+
	This policy will provide a documented assessment of the health impacts of a proposed development and its effects on health inequalities
8. Green Spaces, Open Air Sports and Leisure	I
	This policy could lead to protection and improvement of green spaces, as these are important for health.
11. Transport, Air	I
	This policy could improve provisions for walking and cycling, as these help to promote good health.
Impact on adjacent authorities	No impact
Mitigation meas April 18	Include something about social exclusion (not just health inequalities) in the policy
Changes April – August 18	Although the wording of the policy has been moved around, overall the changes are insignificant in terms of SA scoring.

RE6. Air quality

(No direct links for sustainability objectives 1-2, 5-8, 10, 12 and 14-15)

Sustainability Objective	SA assessment
3. Housing	I
	Impacts on air quality will be considered when planning permission is granted. This would ensure that developments are not put where there is poor air quality or where they could harm air quality, but it could limit where developments can be sited.
4. Human Health	+
	Impacts on air quality will be considered when planning permission is granted. Air pollution is a significant health concern in Oxford. Consideration of air pollution impacts on new sensitive receptors will also help ensure that human health is not put at additional risk from poor air quality.
9. Biodiversity	+
	Impacts on air quality will be considered when planning permission is granted. This would ensure that biodiversity is not put at additional risk from poor air quality. This is of particular importance for the Oxford Meadows SAC.
11. Transport, Air	++
	This policy aims to protect and enhance air quality. Information in an AQA would have to demonstrate that measures are in place to manage air quality impact.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	I
	This policy could limit the use of certain renewable technologies (e.g. biomass) as part of developments, if such technologies were proposed in locations with existing poor air quality.
Impact on adjacent authorities	No significant impact
Mitigation meas April 18	Clarify whether the AQAs are required where developments will generate significant air pollution, or where they will (jointly with existing air pollution levels) lead to poor air quality. An example of the first could be a large development in an area of relatively good current air quality; the latter could be a small development in an area of relatively poor current air quality. Include any requirements re. air quality related to the Oxford Meadows SAC (via the HRA); and refer to the SAC in the explanatory statement. Please note that NO_2 standards for sensitive ecosystems are more exigent than for people: 20-30µg/m^3 instead of 40µg/m^3 Is there scope for 'air quality neutralisation', e.g. funding improvements in air quality elsewhere (notably where it is currently bad) in return for being allowed some increases near the development?
Changes April – August 18	The policy has been changed significantly, but mostly it's moving sentences around. Air Quality Assessments are now required only for major proposals. The policy gives no indication of the Mitigation meas April 18 that might be needed to ameliorate air pollution (e.g. car free, provision of funding for Controlled Parking Zones).
Mitigation meas. Aug 18	Note in supporting text the problems with air pollution at Oxford

Sustainability Objective	SA assessment
	Meadows SAC. Specify that exposure, in the policy, refers to exposure of people and ecosystems. Clarify what types of mitigation measures might be required where negative air quality impacts are identified, e.g. electric vehicles, car-free development.

RE7. Managing the impact of development

(No direct links for sustainability objectives 1, 5-7, 11-13 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	This policy will prevent 'bad neighbour' development, thus helping to support vibrant communities
3. Housing	+
	This policy will ensure that development does not cause nuisance, overshadowing etc. which also helps to ensure that housing is of good quality
4. Human Health	0
	This will help to protect the health and wellbeing of the population by preventing harmful development. However it will not actively improve health.
8. Green Spaces, Open Air Sports and Leisure	+/-
	This policy might limit to access to open air sports and leisure facilities if floodlighting etc. not permitted. However, it would maintain the quality of green spaces.
9. Biodiversity	0
	This will indirectly help to protect biodiversity by protecting flora and fauna from noise, dust, light pollution etc.
10. Urban Design and Heritage	0
	Protection from light pollution would help to protect the setting of Oxford, and views in and out of the city
14. Economy and employment	+/-
	This policy will ensure that employment development does not cause nuisance, which also helps to ensure that it is of good quality. However it may limit where some employment development can go.
Impact on adjacent authorities	No impacts
Mitigation meas April 18	This policy seems to partly overlap with the policy on noise and vibration: remove reference to noise in this policy?
Changes April – August 18	The new policy is much more explicit and comprehensive in terms of the types of impacts that it considers. This does not change the scoring, but essentially broadens the effect of the policy.
Mitigation meas Aug 18	Reduce overlap with other policies, e.g. H14, 4.10, T2.

RE8. Noise and vibration

(No direct links for sustainability objectives 1, 5-7, 10, 12-13 and-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	This policy will prevent 'bad neighbour' development and help to support vibrant communities
3. Housing	+/-
	This policy will ensure that housing is not put where there are high noise levels, but it could limit where housing can be sited.
4. Human Health	0
	The policy helps to maintain satisfaction with area as place to live.
8. Green Spaces, Open Air Sports and Leisure	+/-
	This policy will provide additional protection for amenity spaces from the negative impacts of noise, but could also restrict some forms of sports development where these are likely to cause significant noise
9. Biodiversity	0
	This policy will provide additional protection for ecosystems from the negative impacts of light pollution.
11. Transport, Air	+/-
	Transport is a major cause of noise. This policy could restrict transport developments, or developments near major transport infrastructure
14. Economy and employment	+/-
	This policy will ensure that sensitive employment developments is not put where there are high noise levels, but it could limit where new noisy employment development can be sited.
Impact on adjacent authorities	No impact
Mitigation meas April 18	This policy seems to overlap with the policy on nuisance
Changes April – August 18	The new policy removes the clause about what issues proposals for noise sensitive developments should have regard to, but is otherwise very similar to the previous policy. It has the same impacts, and the scoring has not changed.

RE9. Land quality

(No direct links for sustainability objectives 1-3, 5-8, 10-11, and 13-15)

Sustainability Objective	SA assessment
4. Human Health	0
	This policy protects human health from the negative impacts of contaminated land
9. Biodiversity	0
	This policy will provide additional protection for flora and fauna from the negative impacts of contaminated land
12. Water Quality, Quantity and soil	0
	This policy will provide additional protection /remedial measures for water and soil quality from the negative impacts of contaminated land
Impact on adjacent authorities	No impact
Changes April – August 18	Almost no changes to the policy. No changes to the scoring.

5. GREEN SETTING ETC.

This plan chapter was comprehensively rewritten in Summer 2018, so the appraisals all date from August 2018. Most of the policies in this chapter are protective, i.e. they protect different land uses from development. This is good compared to the 'no plan' option, which might see them being built on; but basically maintains the status quo compared to the current situation: this sustainability appraisal tests against the current situation, hence the preponderance of '0' scores.

G1. Protection of green and blue infrastructure network

(No direct links for sustainability objectives 2 and 5-7)

Sustainability Objective	
1. Flooding	0
	Protection of the green and blue infrastructure helps to prevent flooding, though this policy protects the status quo rather than actually reducing flooding.
3. Housing	+/-
	Protection of parks and other open spaces reduces the potential to site housing there, but it helps to support the quality of housing (i.e. access to amenities)
4. Human Health	0
	Protecting parks and open spaces helps to ensure that people have access to outdoor leisure opportunities. Such areas are also good for mental health, so protecting them will help to protect mental health.
8. Green Spaces, Open Air Sports and Leisure	0
	This is a protective policy rather than one that would provide new open spaces, so it protects the status quo. The requirement to replace any loss with equivalent or better provision in a suitable location might be difficult to implement in practice.
9. Biodiversity	0
	As for 8.
10. Urban Design and Heritage	0
	As for 8.
11. Transport, Air	0
	Parks and open spaces offer opportunities for walking and cycling. Protecting these spaces helps to protect the status quo.
12. Water Quality, Quantity and soil	0
	Protecting the green and (particularly) the blue infrastructure helps to ensure that water quality is maintained, and can act as a source of aquifer replenishment. This policy protects the status quo.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	Green and blue infrastructure helps to provide shade and cooling, thus reducing the need for air conditioning. This policy protects the status quo.
14. Economy and employment	0
	Oxford's parks and canals support jobs and an attractive business environment. This policy protects the status quo.
15. Sustainable Tourism	0
	Oxford's parks and canals are tourism destinations, and provide an attractive backdrop to Oxford's famous buildings. This policy protects

Sustainability Objective	
	the status quo.
Impact on adjacent authorities	0 No significant impact
Changes September 18	Removal of sequential test of first having to show that development is not possible on brownfield land and then outside the Green Infrastructure Network. Replaced by requirement to replace the loss by equivalent or better provision in a suitable location. Possible loss despite this requirement as it might be difficult to implement, but overall no change in scoring.

G2. Protection of biodiversity and geodiversity

(No direct links for sustainability objectives 2, 5-7 and 10-11)

Sustainability Objective	
1. Flooding	0
	Biodiversity sites help to prevent flooding by acting as soakaways, though this policy protects the status quo rather than actually reducing flooding.
3. Housing	+/-
	Protection of biodiversity sites reduces the potential to site housing there, but it helps to support the quality of housing (i.e. access to amenities)
4. Human Health	0
	Biodiversity sites provide opportunities for outdoor leisure opportunities. Such areas are also good for mental health, so protecting them will help to protect mental health.
8. Green Spaces, Open Air Sports and Leisure	0?
	This is a protective policy rather than one that would provide new open spaces, so it protects the status quo. Some uncertainty because of the 'get out' clauses regarding need for new development.
9. Biodiversity	0?
	As for 8.
12. Water Quality, Quantity and soil	0
	Biodiversity sites help to ensure that water quality is maintained, and can act as a source of aquifer replenishment. This policy protects the status quo.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	Biodiversity sites generally help to provide shade and cooling, thus reducing the need for air conditioning. This policy protects the status quo.
Impact on adjacent authorities	0 No significant impact
Changes September 18	Policy significantly rewritten and somewhat weakened in its protection. Biodiversity generally no longer as clearly protected, but rather sites and species of importance. Designated wildlife sites now seem to be protected to the same or lesser level than general open space (policy G7). Question marks added to 8. and 9. to reflect this, and matter raised with the planning team.
Mitigation meas Sep 18	Ensure that wildlife sites in G2. are protected at least to the level that

Sustainability Objective	
	green areas are protected in G7.

G3. Green Belt

The policy allows development in the Green Belt which has been assessed to have a 'low' or 'moderate' impact on the Green Belt. (No direct links for sustainability objectives 1-2, 5-7, 11 and 15)

Sustainability Objective	SA assessment
3. Housing	+/-
	This policy constrains development in the Green Belt. However release of development sites that have a 'moderate' and 'low' impact on the green belt for housing would have a positive impact on housing delivery.
4. Human Health	+/-
	Development in the Green Belt would reduce people's access to green spaces and the health benefits that this brings. However it would help to provide housing, which has health benefits. The policy protects other Green Belt areas.
8. Green Spaces, Open Air Sports and Leisure	-
	Any development permitted in the Green Belt would have negative impact as it is would involve the release of some land from the Green Belt, although it is less than under other possible options. The policy protects other Green Belt areas.
9. Biodiversity	-
	Any development permitted in the Green Belt would affect biodiversity, although the sites have been chosen to avoid the most biodiverse sites. The policy protects other Green Belt areas.
10. Urban Design and Heritage	-
	Any development permitted in the Green Belt could result in a moderate impact to the green setting of Oxford however this would depend on which sites were released. The policy protects other Green Belt areas.
12. Water Quality, Quantity and soil	-
	Any development permitted in the Green belt would negatively affect soil quality, with the effect depending on the quality of the soil in the land that was to be released from the Green Belt. The policy protects other Green Belt areas.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	-
	Development in the greenbelt would reduce carbon fixing.
14. Economy and employment	+/-
	As no sites for employment are being considered for release from the green belt this option scores poorly in terms of employment growth. However the delivery of housing is considered to be a key barrier to delivering economic growth so overall the impact is mixed. The policy protects other Green Belt areas.
Impact on adjacent authorities	+/-
	This policy constrains development in the Green Belt, thus requiring adjacent authorities to provide more housing to fulfil Oxford's objectively assessed need. However some housing development is

Sustainability Objective	SA assessment
	being put forward in the Green Belt, thus minimising the need for provision by adjacent authorities. The policy protects other Green Belt areas.
Changes April – August 18	This policy was moved from Ch. 4 to Ch. 5.

G4. Allotments and community food growing

(No direct links for sustainability objectives 3, 5-7, and 13-15)

Sustainability Objective	
1. Flooding	I
	Allotments help to prevent flooding by acting as soakaways, though this policy protects the status quo rather than actually reducing flooding
2. Vibrant Communities	I
	Allotments and areas for community food growing help to improve the vibrancy of communities. The policy protects existing allotments and states that new community food growing space may form part of the open space provision, but is not definite about whether new food growing space will be provided.
4. Human Health	I
	Allotments and areas for community food growing help to improve human health by providing exercise, healthy food, and mental health benefits. The policy protects existing allotments and states that new community food growing space may form part of the open space provision, but is not definite about whether new food growing space will be provided.
8. Green Spaces, Open Air Sports and Leisure	I
	The policy protects existing allotments and states that new community food growing space may form part of the open space provision, but is not definite about whether new food growing space will be provided.
9. Biodiversity	I
	Allotments often act as wildlife refuges, so increasing them can be expected to improve biodiversity. The policy protects existing allotments, but is not definite about whether new food growing pace will be provided.
10. Urban Design and Heritage	I
	Allotments and other community food growing spaces can be attractive additions to the urban fabric. The impact of this policy will depend on whether new areas are provided, and how the areas themselves are designed and managed.
11. Transport, Air	0
	Allotments provide locally-grown, 'zero mile' food. However their impact is overall small.
12. Water Quality, Quantity and soil	I
	Allotments can act as a source of aquifer replenishment. This policy protects existing allotments but is not definite about whether new food growing space will be provided. The impact of allotments on water quality depends on how they are managed.

Sustainability Objective	
Impact on adjacent authorities	0 No significant impact

G5. Outdoor sports

(No direct links for sustainability objectives 3, 5-7, and 13-15)

Sustainability Objective	
2. Vibrant Communities	0
	Outdoor sports facilities help to support vibrant communities, e.g. through team sports. This policy helps to protect such facilities although it does not actually increase them.
3. Housing	+/-
	The protection of outdoor sports areas reduces the potential for new housing to be built. However it helps to ensure that such housing is provided with good quality services and infrastructure.
4. Human Health	0
	Outdoor sports facilities help to support good health by offering opportunities for sport. This policy helps to protect such facilities although it does not actually increase them.
8. Green Spaces, Open Air Sports and Leisure	0
	This policy helps to protect outdoor sport facilities although it does not actually increase them.
Impact on adjacent authorities	0 No impact
Changes September 18	Removal of a requirement that reduction of state school playing field facilities must show that the site will not be required in the longer term for school playing field or school use, and does not form part of the Green Infrastructure Network. Again this does not alter the overall thrust of the policy, but weakens it.

G6. Residential garden land

(No direct links for sustainability objectives 4-7, 11, and 14-15)

Sustainability Objective	
1. Flooding	-
	New dwellings on residential garden land would seal the soil, contributing to the risk of flooding elsewhere. Any dwellings built on residential garden land in areas prone to flooding could also be at risk of flooding.
2. Vibrant Communities	+
	New dwellings on residential garden land would improve the efficiency/density of land use. Clause a) in the policy would help to prevent 'town cramming'.
3. Housing	+
	New dwellings on residential land would help to provide more housing. Clause b) in the policy would help to ensure that the new housing was of an adequate standard.

Sustainability Objective	
8. Green Spaces, Open Air Sports and Leisure	0
	The reduction in garden space will make publicly accessible open spaces more important, but does not change the amount and quality of public open spaces.
9. Biodiversity	-
	Gardens support a range of plants and animals. If a significant number of new houses are built in garden land, then this would negatively affect biodiversity.
10. Urban Design and Heritage	I
	The policy would lead to urban intensification. How this affects urban design would depend on the location, design etc. of the new dwellings.
12. Water Quality, Quantity and soil	-
	New dwellings on residential garden land would reduce the potential for water infiltration, and would seal the soil.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	-
	The change from garden land to housing will reduce carbon fixing.
Impact on adjacent authorities	+ This could at least slightly reduce housing pressure on adjacent authorities
Mitigation meas Aug 18	Include a clause about the development not increasing flood risk; restrict development in zone 3 and 3a garden land

G7. Other green and open spaces

(No direct links for sustainability objectives 5-6, 11 and 14-15)

Sustainability Objective	
1. Flooding	-
	New dwellings on green/open spaces would seal the soil, contributing to the risk of flooding elsewhere. Any dwellings built on residential garden land in areas prone to flooding could also be at risk of flooding.
2. Vibrant Communities	+/-
	The policy requires any development on green and open spaces to bring benefits to the community, for example through delivery of community-led housing. However this would be counterbalanced by the community disbenefits brought about by the loss of the green/ open space.
3. Housing	+
	This policy would allow housing (under controlled circumstances) on land that would not otherwise have been allocated for development.
4. Human Health	I
	The impact of this policy would depend on the development that emerges from the policy, e.g. a health centre would have positive impacts that could balance out the negative impacts on health of losing a green space, but another form of development might have negative net impacts.
7. Essential services and facilities	+
	This policy could allow essential services and facilities to be provided on land that would not otherwise have been allocated for development.

Sustainability Objective	
8. Green Spaces, Open Air Sports and Leisure	-
	This policy would lead to the loss of green and open spaces.
9. Biodiversity	+/-
	The policy requires impacts on biodiversity to be minimized, and any proposal to lead to improvements in biodiversity or amenity value (not just biodiversity). Broadly the negative and positive impacts of this policy balance out.
10. Urban Design and Heritage	I
	The policy requires consideration to be given to the project layout and it impacts on the townscape and the setting of heritage assets. Its impacts will depend on how this is enforced.
12. Water Quality, Quantity and soil	-
	New development on green/open spaces would reduce the potential for water infiltration, and would seal the soil. The policy requires watercourses to be protected.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	-
	This policy would lead to the loss of green and open spaces, and associated carbon fixing.
Impact on adjacent authorities	0 No significant impact
Mitigation meas Aug 18	Include a clause about the development not increasing flood risk; restrict development in zone 3 and 3a land?

G8. Protection of existing Green Infrastructure features

(No direct links for sustainability objectives 1-3, 5-7, 11-12 and 15)

Sustainability Objective	
4. Human Health	0
	Trees and woodlands provide people with outdoor leisure opportunities. They are also good for mental health, so protecting them will help to protect mental health.
8. Green Spaces, Open Air Sports and Leisure	0
	This is a protective policy rather than one that would provide new green infrastructure, so it protects the status quo.
9. Biodiversity	0
	As for 8.
10. Urban Design and Heritage	0
	Trees are a key component of Oxford's streetscape. This policy would aim to protect their visual benefits.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	Trees and woodlands help to provide shade and cooling, thus reducing the need for air conditioning. They also fix carbon. This policy protects the status quo.
14. Economy and employment	0
	Oxford's green infrastructure help to provide an attractive business environment. This policy protects the status quo.
Impact on adjacent authorities	0 No significant impact

G9. New and enhanced Green Infrastructure features

(No direct links for sustainability objectives 3, 5-7, and 13-15)

Sustainability Objective	
3. Housing	+/-
	The requirement to provide new public space in larger residential sites means that the space is not available for housing. However it will increase the quality of the housing development.
4. Human Health	+
	This policy will lead to new areas open for public access, notably the 10% of larger residential sites that must be put aside for new public open space.
8. Green Spaces, Open Air Sports and Leisure	+
	Although the policy is unlikely to provide a net increase in green spaces in the strategic sites located on the Green Belt, elsewhere it could provide new green spaces. It will definitely increase public access to green spaces, since many sites will previously have been in private ownership.
9. Biodiversity	I
	The policy is unlikely to provide a net increase in biodiversity in the strategic sites located on the Green Belt. Elsewhere the impact on biodiversity will depend on what was previously on the site and what the new development will provide.
10. Urban Design and Heritage	+
	Provision of public open spaces improves the urban landscape.
12. Water Quality, Quantity and soil	I
	The policy is unlikely to provide a net improvement in water quality or drainage in the strategic sites located on the Green Belt. Elsewhere the impact on water quality and drainage will depend on what was previously on the site and what the new development will provide.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	The policy is unlikely to provide a net improvement in carbon fixing in the strategic sites located on the Green Belt. Elsewhere the impact on carbon fixing will depend on what was previously on the site and what the new development will provide. Overall the net impact is likely to be negligible.
Impact on adjacent authorities	0 No significant impact
Mitigation meas Aug 18	Should the first para include reference to enhancement of GI features? Reconsider requirement for all major developments with flat or gently sloping roofs to incorporate green or brown roofs where feasible, as these are often very expensive to install. The last two paragraphs in this policy don't seem to be about green infrastructure, but rather about development that could affect green infrastructure: water-based recreation facilities and visitor moorings. Put in Ch. 8 instead?

6. HERITAGE

DH1. High quality design and placemaking

(No direct links for sustainability objectives 1-2, 5-9 and 11-15)

Sustainability Objective	SA assessment
3. Housing	0
	This policy helps to ensure that new housing is well-integrated into new developments, but does not provide for new homes.
4. Human Health	0
	This policy will result in well-designed living environments which support wellbeing. However its impact on overall wellbeing is likely to be limited.
10. Urban Design and Heritage	+
	This policy will help to ensure that new developments contribute to, and enhances the built environment; responds to and respects the unique context of Oxford; and maintains/enhances a sense of place and local distinctiveness.
Impact on adjacent authorities	No impact
Mitigation meas April 18	Link more clearly to the Ch. 4 policy on sustainable design and Ch. 5 policy on protection of blue, green and open spaces?
Changes April – Aug 18	The policy has essentially been completely rewritten (most of the previous policy's wording has been removed), and so has been completely reappraised.

DH2. Views and building heights

(No direct links for sustainability objectives 1-2, 4-9 and 11-13)

Sustainability Objective	SA assessment
3. Housing	-
	This policy likely to limit the height of buildings where it may be an efficient use of land to build higher at higher densities in order to provide more housing.
10. Urban Design and Heritage	0
	This policy aims to protect and Oxford's historic skyline of Oxford in terms of height and mass, and to protect views. This will help to support urban design and the heritage.
14. Economy and employment	-
	This policy is likely to limit the amount of employment space in the city centre.
15. Sustainable Tourism	0
	This will help to protect the 'dreaming spires' which are part of Oxford's tourist attraction
Impact on adjacent authorities	No impact
Changes April – August 18	The policy has not changed much, but reference to the 'four visual tests' has been added. No change to the scoring.
Changes September 18	Removal of reference to considering building heights that are less likely to have an impact on the historic skyline; and to consider

Sustainability Objective	SA assessment
	cumulative impacts. This does not significantly change the policy. No change to the scoring.

DH3. Designated heritage assets

(No direct links for sustainability objectives 1-9 and 11-14)

Sustainability Objective	SA assessment
10. Urban Design and Heritage	0
	This policy helps to ensure that development respects, maintains and strengthens distinctiveness and sense of place, but will not actively improve heritage assets. It is also likely to promote high quality urban design.
15. Sustainable Tourism	0
	This policy will help to protect Oxford's historic buildings, which are a major tourist attraction.
Impact on adjacent authorities	No impact
Changes April – August 18	Additions have been made to the policy to make it more in line with the NPPF, notably the entire last para starting 'In cases where…". The gist of the policy, however, remains the same, so no changes were made to the scoring.
Changes September 18	Expansion of information about proposed development that would lead to substantial harm to a designated heritage asset; and a new paragraph about conservation areas. The thrust of the policy remains the same. No changes to the scoring.

Former DH4. Conservation areas

(No direct links for sustainability objectives 1-9 and 11-14)

Sustainability Objective	SA assessment
10. Urban Design and Heritage	0
	This policy helps to ensure that development respects, maintains and strengthens distinctiveness and sense of place, but will not actively improve conservation areas. It is also likely to promote high quality urban design.
15. Sustainable Tourism	0
	This policy will help to protect Oxford's conservation areas, which are a major tourist attraction.
Impact on adjacent authorities	No impact
Changes April – August 18	Although much of the policy wording has changed, the only substantial change is the statement that planning permission will not be granted for proposals involving substantial demolition of a building that contributes to the special interest of the conservation area. No change to the scoring.
Changes September 18	This policy was deleted and combined with DH3.

DH4. Archaeological remains

(No direct links for sustainability objectives 1-5, 7-9 and 11-15)

Sustainability Objective	SA assessment
6. Education	0?
	This policy aims to protect and preserve archaeological remains where possible, including for educational purposes
10. Urban Design and Heritage	0?
	This policy helps to ensure development will respect, maintain and strengthen distinctiveness and sense of place. It does not actively improve the heritage.
Impact on adjacent authorities	No impact
Changes April – August 18	Much of the second half of this policy has been added, notably when proposals will be supported or refused. This does not change the gist of the policy, which is to protect archaeological remains. No change to the scoring.
Changes September 18	"Development proposals that affect archaeological features and deposits will be supported where" has been weakened from "they will not result in harm to the significance etc." to "any harm to the significance etc. will be weighed against the benefits". Question marks added to the scores to reflect this.

DH5. Local Heritage Assets

(No direct links for sustainability objectives 1, 4-9 and 11-13)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy helps to identify and protect elements of Oxford's historic environment that are particularly valued by local communities, thus helping to maintain vibrant communities.
3. Housing	-
	Protection of buildings/sites that are on the Oxford Heritage Asset Register could reduce their potential for being redeveloped to provide more housing.
10. Urban Design and Heritage	0
	This policy helps to identify and protect elements of Oxford's historic environment that are particularly valued by local communities.
14. Economy and employment	-
	Protection of buildings/sites that are on the Oxford Heritage Asset Register could reduce their potential for being redeveloped for (new) employment uses.
15. Sustainable Tourism	0
	This policy helps to protect Oxford's historic environment which is a major tourism attraction
Impact on adjacent authorities	No impact
Changes April – August 18	Only minor changes. No changes to the scoring.

DH6. Shopfronts and signs

(No direct links for sustainability objectives 1-9 and 11-13)

Sustainability Objective	SA assessment
10. Urban Design and Heritage	0
	This policy will help to ensure that shop fronts etc., many of which are found in the central conservation area, respond appropriately to the character of the area. This is likely to protect and maintain the urban design and heritage.
14. Economy and employment	0
	This is likely to support retail and the local economy, but not in a significant way.
15. Sustainable Tourism	0
	This policy will help to ensure that Oxford remains an attractive place for tourists to visit
Impact on adjacent authorities	No impact
Changes April – August 18	No changes to the policy or the appraisal findings.

DH7. External servicing features and stores

(No direct links for sustainability objectives 1-9, 12 and 14-15)

Sustainability Objective	SA assessment
10. Urban Design and Heritage	0
	This policy will help to protect high quality urban design, by accommodating bins in locations that do not detract from the design of buildings.
11. Transport, Air	+
	This policy will encourage cycling by helping to ensure that bike stores are provided as part of residential developments.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	Ensuring new dwellings are required to include space to store bins should enable residents to recycle as much of their waste as possible.
Impact on adjacent authorities	No impact
Mitigation meas April 18	Seems to partly overlap with the last policy in Ch. 7, 'cycle parking': remove overlap?
Changes April – August 18	Almost no changes to the policy. No changes to the scoring.

7. ENSURING EFFICIENT MOVEMENT INTO AND AROUND THE CITY

M1. Prioritising walking, cycling and public transport

(No direct links for sustainability objectives 1, 3, 6-10 and 12)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	The policy supports walking and cycling. This indirectly supports the

Sustainability Objective	SA assessment
	provision of services locally, as well as a 'human scale' environment that promotes social interaction. Safeguarding the branch-line is likely to result in longer-term benefits to the communities of Oxford over the next 20 years.
4. Human Health	0
	Walking and cycling are both good ways of getting exercise, so improving human health. A shift from journeys taken by car to other modes is also likely to reduce air pollution, which is a significant health problem in Oxford. However this change is unlikely to be significant, given the already high levels of cycling in Oxford..
5. Poverty, Social Exclusion and Inequality	+
	This policy supports modes of travel that help reduce social exclusion and inequality. A new Cowley Branch Line could help facilitate access to parts of the city that are deprived.
11. Transport, Air	+
	This policy will encourage people to use active travel as well as maintaining the current approach of bus-priority. While this is likely to reduce reliance on the private car, it does not represent a marked change from the system is currently in place. However delivery of a new branch line would help to encourage the use of rail for longer-distance connections via Oxford Railway Station, and encourage access to central Oxford from areas to the south of the city. Rail is a more sustainable transport option than other modes which are currently accessible from this area, mainly the private car.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	This policy will help to prevent a significant increase in carbon emissions associated with private cars.
14. Economy and employment	+/-
	This policy helps to reduce congestion, and improve access to employers by walking and cycling. Commutes by active travel will help to improve the health of the workforce. Safeguarding land for the Cowley Branch Line and new stations could lead to significant access improvement to employment opportunities and employers; improvements to the Oxford railway station should also encourage people to travel by train. The policy may indirectly restrict vehicle use, and so have some negative effect on employers.
15. Sustainable Tourism	0
	This policy helps to reduce congestion and support public transport, so ensuring that more sustainable travel options are available for tourists. It will also make it easier for tourists to move around the city by walking and cycling, but these benefits are unlikely to be significant.
Impact on adjacent authorities	+
	Facilitating access to Oxford by walking, cycling and public transport will help to reduce traffic in adjacent authorities. A new Cowley branch line would encourage the use of rail for longer-distance connections via Oxford Railway Station.
Mitigation meas April 18	The policy is called 'prioritising walking etc.'; the first sentence of the policy says that access by these modes will be 'prioritised'; and the supporting text gives good examples of prioritization. However the

Sustainability Objective	SA assessment
	policy doesn't really say anything about prioritisation. Does/can this be hard-wired more clearly into the policy itself? Similarly, the supporting text refers to parking for tourist coaches, and the fact that this is a problem, but the policy itself doesn't say anything about this. The SA/SEA of the options suggested that requiring tourist coaches to use the P&R would be beneficial. The SA/SEA of the options suggests that terminating scheduled coaches outside the city centre (at P&Rs) and using other bus services into the city centre would be beneficial. Are any policies needed about dockless bikes, i.e. specific locations for the companies to park them, support or not from the city council etc?
Changes April – August 18	Much of the policy has been reworded and strengthened (e.g. developments should also minimise the need to travel, cycle parking facilities should be on site). More substantial additions are the need to ensure sufficient space for bus stops, and for developments to be designed to accommodate bus movements; and support for improvements to Oxford Railway Station. Reference to dockless bikes added to T6 (now M5).
Changes September 18	Minor wording changes only.

M2. Assessing and managing development

(No direct links for sustainability objectives 1-3, 5-6, 8-10, 12 and 15)

Sustainability Objective	SA assessment
4. Human Health	0
	This policy will help to encourage more sustainable modes of travel, including active travel, which will help to protect human health.
7. Essential services and facilities	0
	This policy will help to ensure that all development that is likely to have significant transport implications provide TA/Ss and TP/TPSs which consider accessibility of essential services and facilities. This should help to protect accessibility to essential services and facilities.
11. Transport, Air	+
	This policy will help to ensure that all development that is likely to have significant transport implications provide TA/Ss and TP/TPSs. These are likely to provide for a range of sustainable travel options. Encouragement of more sustainable modes of travel and reducing journeys is likely to have a positive impact on air quality and mitigating the impacts of development which can reduce congestion. Encouragement of more sustainable modes of travel, especially for freight, deliveries and service vehicles in addition to workplace TPs is likely to have a further positive impact on air quality.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	This policy will encourage more sustainable modes of travel which is likely to reduce journeys and could limit reduce greenhouse gas emissions.
14. Economy and employment	+/-
	The requirement for a Service and Delivery Management Plan will

Sustainability Objective	SA assessment
	impose additional constraints on employers' activities. However cumulatively this will help to reduce congestion in Oxford, which will enable more efficient operations by businesses.
Impact on adjacent authorities	+
	A change in mode of travel (and especially commuting) from the car to public transport, walking and cycling will help to reduce congestion in adjacent authorities.
Mitigation meas April 18	The reference to B8 freight consolidation facilities in this policy does not currently seem to be supported by the employment hierarchy policy. Either remove reference here or add to employment policy.
Changes April – August 18	The policy uses different terminology (TA/S instead of TA, TP/TPS instead of TP). The policy no longer states that employers must show what incentives are being offered to facilitate a modal shift away from the car.
Mitigation measures Aug 18	Clarify the terminology, and when each type of assessment/plan is required.
Changes September 18	Reference now is only to transport assessments, which makes the policy clearer. No change to the scores.

M3. Motor vehicle parking

(No direct links for sustainability objectives 6, 8-9, 12 and 15)

Sustainability Objective	SA assessment
1. Flooding	0
	Provision of only limited additional car parking will minimize the amount of new hard-standing, so preventing an increase in run-off and flooding.
2. Vibrant Communities	+
	This policy will help to promote sustainable communities by supporting housing and employment growth without a corresponding increase in parking. It is likely to result in the most efficient use of land as the least amount of land would be given up to car parking.
3. Housing	+
	Limited additional car parking will result in more land being available for housing than other options.
4. Human Health	+
	Limited additional car parking, linked to increased housing and employment, will support more active travel by sustainable modes of transport, which could result in a healthier population.
5. Poverty, Social Exclusion and Inequality	+/-
	This policy could have both a positive and a negative impact. The policy and supporting text allow for parking for disabled people, which helps to reduce inequality between more and less mobile people. However the policy may adversely impact less affluent households where dwelling occupancy levels may be higher than expected.
7. Essential services and facilities	I
	Parking is particularly important for health services where service users may be unable to walk/cycle/use public transport. The policy

Sustainability Objective	SA assessment
	permits new parking spaces for disabled people, but this policy could still have a negative impact on e.g. access to hospitals
10. Urban Design and Heritage	+
	Llimited additional parking is likely to support good urban design through better use of limited space as part of development proposals. It would avoid large areas of car parking which can have negative impacts on sense of place, character and the setting of heritage assets. The explanatory text promotes the use of controlled parking zones to avoid increases in on-street car parking.
11. Transport, Air	++
	Limited additional parking is likely to encourage more active travel and use of more sustainable public transport modes. This is also likely to have a positive impact on air quality.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	Limited additional parking is likely to encourage more active travel and use of sustainable transport modes transport which could reduce greenhouse gas emissions.
14. Economy and employment	-
	Limited additional parking, linked to increased employment area, could make it more difficult to access certain employment sites by car. This could also cause additional in-commuting problems in areas not well-served by public transport and which have poor accessibility by walking and cycling, although the re-opening of the Cowley Branch Line would deal with some of these problems. Providing only limited parking in inaccessible locations could result in poor performance of non-residential uses in these locations as customers/ employees may not be able to access these uses conveniently by sustainable transport modes. However other policies in the plan aim to reduce the attractiveness or car use and minimise traffic, thus reducing congestion and the cost this imposes on businesses.
15. Sustainable Tourism	+/-
	This policy will make it more difficult for people to visit tourist attractions Oxford by car. While this could limit the number of visitors, it may also encourage people to visit the city using more sustainable modes of travel such as public transport.
Impact on adjacent authorities	+
	This policy will make driving in and out of Oxford less attractive because it will be harder to find a parking space. It supports other transport policies (e.g. support for walking, cycling and public transport), and will help to reduce traffic in adjacent authorities.
Mitigation meas April 18	Generally a very exciting policy (though less exciting than the previous blanket 'no additional parking' policy). The first para has several and/or statements: does the policy need to clarify whether these are 'and' or 'or', as that might make a difference in practice? In the supporting text, para starting "Opportunities for successful", is it worth adding a final sentence "The expected increase in driverless cars is also expected to reduce the need for private cars and associated parking"?
Changes April – August 18	This policy was comprehensively rewritten, although it has mostly the same impacts as the previous version of this policy. No changes to

Sustainability Objective	SA assessment
	scoring.
Mitigation meas Aug 18	This policy makes car-free development dependent on the roll-out of CPZs, which gives great uncertainty to developers (will my area have a future CPZ or not?) and would certainly have land-owners lobbying against CPZs. It could also encourage car-free development on the edges of CPZs, leading to additional parking problems outside the CPZs. Should it be the other way around, i.e. CPZs will be supported in areas XYZ? Also the assumptions made about car-free housing in the Habitats Regs Assessment (see Richard Wyatt) are for a stated number of car-free homes, and assures Natural England that all of Oxford will be covered by CPZs by 2031. If that is correct, then does this need to be stated more clearly here?
Changes September 18	Removal of reference to employer-linked housing areas. This is a significant change although it does not change the scoring of the policy.
Mitigation meas Sep 12	Reinstate reference to employer-linked housing, to be consistent with the HRA.

M4. Provision of electric charging points

(No direct links for sustainability objectives 1-3, 5-8, 12 and 14-15)

Sustainability Objective	SA assessment
4. Human Health	+
	A key benefit of zero emission vehicles is that they will reduce air pollution, which is a major cause of poor health in Oxford
9. Biodiversity	+
	Improved air quality resulting from greater take-up of zero emission vehicles will help to support biodiversity, notably the integrity of the Oxford Meadows SAC
10. Urban Design and Heritage	-
	Increased number of car charging points will lead to more street furniture which will detract from urban design
11. Transport, Air	+
	This policy gives strong support for zero emission vehicles. These are unlikely to affect congestion, modes of transport etc. However they will improve air quality.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	+
	Zero emission vehicles are not carbon neutral: they require more CO2 emissions to build than a petrol or diesel car, and the electricity they require will generate CO2 emissions unless it is purely renewable. However their lifetime CO2 emissions are generally lower than those of a petrol or diesel car, and they have the possibility of being much lower (if the electricity is generated by renewables). So to the extent that zero emission vehicles replace petrol or diesel vehicles, they will help to reduce emissions.
Impact on adjacent authorities	+
	Provision of more electric charging points in Oxford would also support zero emission vehicle ownership outside Oxford, with air

Sustainability Objective	SA assessment
	quality benefits in adjacent authorities.
Mitigation meas April 18	Given the rapid increase in electric bikes, should car charging points also have bike charging facilities, or can/should bike charging facilities be required at e.g. the train station? Can design criteria be set for electric charging points, especially in the city centre and conservation areas?
Changes April – August 18	The policy has been comprehensively rewritten to be clearer about the number of electric charging points needed. The requirements for charging points in public spaces and support for alternative fuel technologies have been moved to the explanatory text. No change to the scoring.
Changes September 18	Requirements have been doubled, from 10% to 20%, so policy is strengthened but no change in its thrust. No change to scoring.

M5. Cycle parking

(No direct links for sustainability objectives 6, 8-9, 12 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy is essentially a continuation and extension of the existing cycle parking standards (now also including requirements for residential/student accommodation). This helps to ensure that residents have easy access to safe parking for their bikes, which encourages cycling, which in turn supports a shift away from the car. This would also alleviate the problem of bikes being inappropriately parked, e.g. on the pavement. The impact would be limited but positive.
3. Housing	+/-
	Cycle parking would take space from possible housing development. However it would also ensure that housing is supported by adequate infrastructure.
4. Human Health	+
	This policy supports a shift to cycling, which has health benefits. It would also help to alleviate the problem of bikes (notably dockless bikes) being inappropriately parked and acting as a health hazard.
7. Essential services and facilities	0
	This policy helps to support access to essential services and facilities via cycling. The impact beyond current cycle standards would be limited but positive.
10. Urban Design and Heritage	+/-
	Well-designed cycle parking helps to reduce clutter. However badly-designed parking (e.g. two-tier parking in inappropriate locations) can act as an eyesore.
11. Transport, Air	+
	This policy supports a shift to cycling, with associated air quality benefits, by adding requirements for residential/student cycle parking.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	This policy supports a shift to cycling, with associated reduction in greenhouse gases due to vehicles. However its impact beyond current

Sustainability Objective	SA assessment
	cycle parking standards is likely to be limited.
14. Economy and employment	0
	This policy is essentially a continuation of current employment cycle parking standards.
15. Sustainable Tourism	0
	This supports sustainable travel by tourists (e.g. dockless bikes) and a less cluttered streetscape. The impact would be limited but positive.
Impact on adjacent authorities	No significant impact
Mitigation meas April 18	Seems to partly overlap with the last policy in Ch. 6: remove overlap? Should cycle parking also accommodate electric bike charging points?
Changes April – August 18	Not formally appraised in April 2018 because the policy was too vague at the time. This appraisal is for the Aug 2018 policy. Reference to dockless bikes added since April 2018.
Mitigation meas Aug 18	Specify that cycle parking should be well-designed, to prevent negative impacts on the streetscape.

8. RETAIL, COMMUNITY AND INFRASTRUCTURE

V1. Ensuring the vitality of centres

(No direct links for sustainability objectives 1, 3, 6, 8, 9, 12 and 13)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy helps to ensure that the day to day needs of the public can be met locally, with other needs easily met in the city centre. It primarily protects the status quo rather than leading to active improvements.
4. Human Health	0
	This policy helps to ensure that daily needs of residents can be met within walking distance which will encourage active travel modes.
5. Poverty, Social Exclusion and Inequality	0
	This policy aims to protect the vitality of local centres, which are important to people living in deprived areas
7. Essential services and facilities	0
	The hierarchy of centres and sequential approach helps to protect the provision of essential services.
10. Urban Design and Heritage	I
	The design of city, district and local centres depends on the implementation of this policy.
11. Transport, Air	0
	This policy limits the need to travel by meeting the daily needs of residents locally to them. For other needs they will travel to the city centre for which there are ample public transport solutions.
14. Economy and employment	0
	Promoting a hierarchy of centres will preserve the vitality of centres by ensuring that people do not need to travel elsewhere to access appropriate services.

Sustainability Objective	SA assessment
15. Sustainable Tourism	0
	Promoting a hierarchy of centres will ensure the majority of attractions which will draw in visitors continue to be concentrated in the city centre which will make them easily accessible for tourists and encourage more visitation, greater spend and protection of the sustainability of Oxford's tourist industry.
Impact on adjacent authorities	
	This policy ensures that Oxford residents can access the services and facilities that they need in local, district and city centres. This helps to reduce the need to travel outside of Oxford for shopping, so reducing traffic.
Changes April – August 18	Minor wording changes only. No change to the scoring.

V2. City centre shopping frontages

This policy is a slight adaptation of the existing plan policies on shopping frontages. (No direct links for sustainability objectives 1, 3-6, 8-13 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy will help to maintain the mix of uses required for vibrant communities.
7. Essential services and facilities	0
	This policy will help to ensure the continued provision of a mix of essential services and facilities.
14. Economy and employment	0
	This policy will support individual businesses by ensuring that, as a whole, the businesses continue to provide an attractive shopping proposition
Impact on adjacent authorities	This policy ensures that Oxford residents have vibrant and attractive shopping areas. This helps to reduce the need to travel outside of Oxford for shopping, so reducing traffic. However this impact is unlikely to be significant.
Changes April – August 18	Information about mix of retail uses at Westgate has been added. Class A2-A5 or D2 requirement for secondary shopping frontages has been reduced from 85% to 40%. These changes do not affect the thrust of the policy. No changes to the scoring.
Changes September 18	The policy would now allow Class A2-A5 or D2 uses unless the proportion of A1 (retail) units at ground floor would fall below 60%. In the previous version of the plan this was 70%. Essentially this would lead to more non-retail use of retail areas. This could affect vibrant communities, hence ? added.
Changes end September 18	Most of the policy rewritten, to focus on criteria for shopping frontages rather than the percentage of units expected to be of various classes (except for Westgate where percentages remain). Policy merged with former policy V4 on district and local centre shopping frontages. The overall purpose of the policy (former policies) remains the same as original: only the ? removed from Vibrant Communities.

V3. Covered Market

(No direct links for sustainability objectives 1, 3-9, and 11-13)

Sustainability Objective	SA assessment
2. Vibrant Communities	+/-
	The Covered Market is a key part of central Oxford's economy. This policy will help to maintain the mix of uses required to keep the market vibrant. However the atmosphere of the market might change, from more retail uses to more food-related uses.
10. Urban Design and Heritage	0
	The Covered Market is a unique part of central Oxford's urban design. This policy will help to maintain its vibrancy.
14. Economy and employment	+/-
	This policy will support individual businesses in the market by ensuring that, as a whole, the market continues to provide an attractive shopping proposition. However there would be a change to more restaurants and pubs, and fewer retail outlets.
15. Sustainable Tourism	+
	The Covered Market is a key tourism destination. This policy will help to maintain its vibrancy. A change to more restaurants and pubs would probably benefit tourism.
Impact on adjacent authorities	No impact
Changes April – August 18	This is a new policy since April 2018.
Changes September 18	Significant changes made to this policy. Class A1 retail uses would now need to account for ≥40% (raised back to 50% in late September) rather than ≥80% at ground floor level, leading to more restaurants/ pubs/takeaways. A paragraph has been added about criteria for uses other than A1 or A3-5. Scores have been changed accordingly, from 0 (maintenance of the status quo) to +/-, and positive for tourism.

Former V4. District and local centre shopping frontages

This policy is a slight adaptation of the existing plan policies on shopping frontages. (No direct links for sustainability objectives 1, 3-6, 8-13 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0?
	This policy will help to maintain the mix of uses required for vibrant communities.
7. Essential services and facilities	0
	This policy will help to ensure the continued provision of a mix of essential services and facilities.
14. Economy and employment	0
	This policy will support individual businesses by ensuring that, as a whole, the businesses continue to provide an attractive shopping proposition
Impact on adjacent authorities	This policy ensures that Oxford residents have vibrant and attractive shopping areas. This kind of local shopping is unlikely to have gone to adjacent authorities, so no impact.
Changes April – August 18	The percentages of various categories allowed have been amended

Sustainability Objective	SA assessment
	slightly (e.g. 85% instead of 90%, 40% instead of 50%). The entire second half of the policy (criteria for determining whether development can go in if the percentages are not met) has been cut. However the gist of the policy remains the same; no change to scoring.
Changes September 18	The percentages for Class A1 uses in Cowley District Centre have been changed from 70% to 60%, i.e. more non-retail uses would be permitted. As with policy V2, ? has been added for vibrant communities.

V4. Sustainable tourism

(No direct links for sustainability objectives 1, 4-10, and 12-13)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy aims to site tourist accommodation in accessible (and limited) locations, helping to keep communities mixed and vibrant. It aims to protect the status quo while allowing for more tourist accommodation.
3. Housing	0
	This policy aims to protect housing from becoming tourist accommodation.
11. Transport, Air	0
	Tourist accommodation generates additional journeys. This policy aims to optimize tourists' access to the city centre by walking, cycling and public transport, and ensure that the traffic impacts of this accommodation are minimized. It aims to protect the status quo.
14. Economy and employment	+
	Tourism is a large economic sector in Oxford, with potential to further grow. This policy aims to support more long-stay tourism which generates more revenue.
15. Sustainable Tourism	+
	This policy aims to support more tourist accommodation whilst minimising the impact of this accommodation on local residents and the transport system. There is significant unmet potential for growth in such accommodation.
Impact on adjacent authorities	
Changes April – August 18	This policy was not detailed enough for appraisal in April 2018.

V5. Cultural and social activities

(No direct links for sustainability objectives 1, 5-9, and 12-13)

Sustainability Objective	SA assessment
2. Vibrant Communities	+
	This policy supports the provision of more cultural and social facilities whilst minimising their impact on local communities. It also protects existing facilities that provide community benefits, notably pubs.
3. Housing	0

Sustainability Objective	SA assessment
	Additional cultural and social facilities would be provided in the city and district centres. This could reduce the land available for housing, but the impact of this would be limited at most.
4. Human Health	0
	This policy supports the provision of more cultural and social facilities whilst controlling their impacts on residential amenity and environmental issues such as noise.
5. Poverty, Social Exclusion and Inequality	0
	The policy will help to limit social exclusion by supporting the provision of cultural and social activities, thus continuing to provide opportunity for social interaction and inclusion.
6. Essential services and facilities	0
	Pubs could be considered an essential service. This policy helps to protect that service.
10. Urban Design and Heritage	0
	At the moment the policy says nothing about design, but it has the potential to promote innovative design and public art.
11. Transport, Air	0
	The policy encourages provision of new cultural etc. uses where they are realistically accessible by walking, cycling or public transport for most of the people travelling to the site. It thus minimizes additional car travel and associated air pollution impact.
14. Economy and employment	+
	The policy supports the cultural/social sector of the economy, whilst aiming to minimise its negative impacts.
15. Sustainable Tourism	+
	Cultural/social activities are part of Oxford's tourism offer. This policy aims to increase these uses whilst minimising their negative impacts.
Impact on adjacent authorities	No significant impact
Changes April – August 18	This policy was not detailed enough for appraisal in April 2018.
Mitigation meas Aug 18	Include a requirement that proposals should fit into, or enhance, the local streetscape, and that the provision of public art will be encouraged. Does the policy need to say anything about evening/ nighttime uses, as these could have significant impacts on local residents?
Changes September 18	Minor wording changes only
Changes late September 18	Policy merged with former policy V7 on pubs. Minor changes to the requirements for pubs. 'Status quo' 0 mark added for Essential Services.

Former V7. Public houses

(No direct links for sustainability objectives 1, 3-5, 7-13 and 15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	The policy aims to protect pubs as local amenities that support vibrant communities.

Sustainability Objective	SA assessment
Impact on adjacent authorities	No impact
Mitigation meas	This is a new policy in September 18. No mitigation proposed.

V6. Infrastructure and cultural and community facilities

(No direct links for sustainability objectives 1, 8-10 and 12-15)

Sustainability Objective	SA assessment
2. Vibrant Communities	0
	This policy helps to ensure that both new and existing development is adequately supported by infrastructure and community facilities. This helps to ensure that facilities are locally available, supporting vibrant communities. It is unlikely to provide a significant increase in infrastructure or community facilities.
4. Human Health	0
	This policy helps to ensure the continued provision of adequate health services, as well as supporting active travel modes.
5. Poverty, Social Exclusion and Inequality	+
	The policy will help to reduce social exclusion by helping to ensure the continued of community centres, health care facilities and schools; and increased provision in areas of deficiency or regeneration. This will help to provide opportunity for social interaction and inclusion.
6. Education	0
	The policy helps to protect the adequate provision of adequate primary and secondary schools.
7. Essential services and facilities	0
	The policy helps to ensure that the amount and quality of community facilities is maintained.
11. Transport, Air	0
	The policy promotes access to community facilities, health services and schools by walking, cycling and public transport, thus helping to reduce the need to travel although it is unlikely to cause a significant modal shift.
Impact on adjacent authorities	The policy helps to ensure that Oxford residents have adequate and conveniently located community facilities. This helps to reduce the need to travel outside of Oxford for community facilities. However the impact is unlikely to be significant.
Mitigation meas April 18	The policy seems to be almost solely about community facilities. Define what is meant by 'infrastructure'? Say more about its provision? Could there be problems if existing facilities are under-used? Does this policy limit those facilities' reuse? Or is that not a problem?
Changes April – August 18	The first sentence – 'Planning permission will only be granted where it can be demonstrated that it will be supported by the appropriate infrastructure in a timely way' has been removed. This significantly weakens the implementation potential of this policy. The last paragraph about CIL, legal agreements and benefits has been moved

Sustainability Objective	SA assessment
	to the explanatory text. Because of these changes, impacts on housing have become so minimal that they have been excluded from the new round of appraisal. Reference to 'ensuring' has been changed to 'helping to ensure'.
Changes late September 18	A last requirement has been added; "this proposal will not result in an unacceptable environmental impact." This helps to maintain the status quo – no change to the scoring.

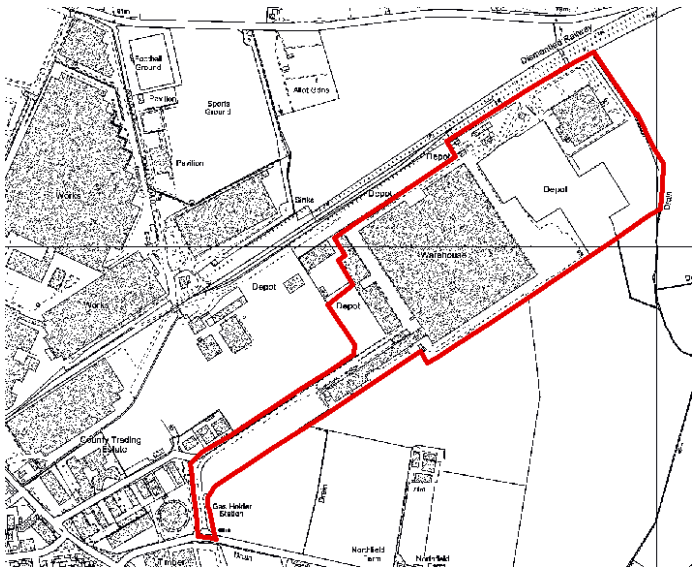
V7. Utilities

(No direct links for sustainability objectives 1-3, 5, 8-10 and 15)

Sustainability Objective	SA assessment
4. Human Health	0
	Good provision of utilities is essential to human health, and this policy will help to maintain this.
6. Education	+
	Supporting IT is likely to help deliver improvements to high quality digital communications networks which can help support education and skills.
7. Essential services and facilities	I
	This policy would support the delivery of water and sewerage infrastructure before development was provided. The effectiveness of such a policy would need to ensure that it did not conflict with the existing legislative process.
11. Transport, Air	0
	Supporting IT is likely to ensure that communications and remote working opportunities are fully realised for businesses which is likely to reduce the need to travel by car. However the policy is likely to have relatively limited impact in this respect.
12. Water Quality, Quantity and soil	I
	Thames Water have documented that Oxford is likely to encounter a supply side deficit beginning in 2019 and slowly increasing throughout the plan period. Whether this policy can help to ensure adequate water infrastructure will depend on its implementation.
13. Climate Change, Energy Efficiency, Renewable Energy, Minimising Waste	0
	Supporting IT is likely to ensure that communications and remote working opportunities are fully realised for businesses which is likely to reduce the need to travel by car which is likely to help reduce congestion, which is likely to help reduce the impacts of climate change. However the policy is likely to have relative limited impact in this respect.
14. Economy and employment	0
	Supporting IT is likely to support the growth of Oxford's strengths around the knowledge based economy and other specialist industries by ensuring that businesses have the appropriate high quality digital facilities. However the policy is likely to have relatively limited impact in this respect. The policy also helps to ensure that adequate utilities are available for any new developments.
Impact on adjacent	I

Sustainability Objective	SA assessment
authorities	Some utility providers (e.g. Thames Water) provide utilities to multiple local authorities. They will be considering provision of utilities over their entire area, and cumulatively the actions of multiple authorities could affect the providers' responses (e.g. need for a new reservoir)
Changes April – August 18	The policy is essentially unchanged. No changes to the scoring.
Changes September 18	Minor changes to wording only. No changes to the scoring.

Appendix 4 – Additional site appraisals not covered by the June 2017 assessment

Site/Policy Reference	**SP8**	Site Location Plan:
Site Name	**Unipart Group**	
Ward	Lye Valley	
Site Size	30.63ha	
Existing Use	In use as a warehouse	
Landowner(s)	Unipart Group	
Relevant Planning History	Unipart submitted for employment development.	
Source	Unprotected Employment Site	

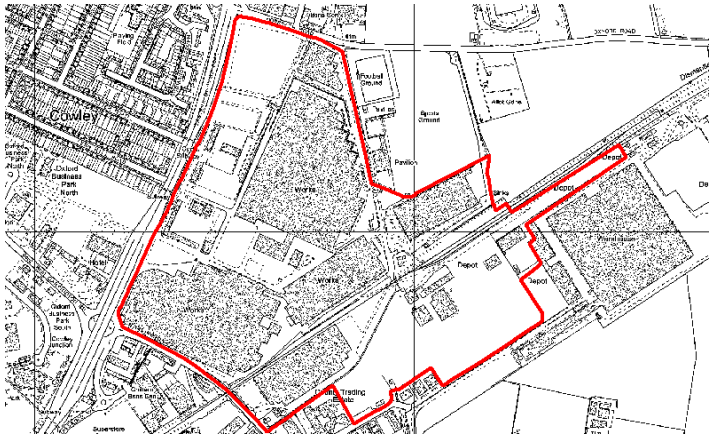
ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	no no	NO
Is the site greenfield in flood zone 3b?	no no	NO NO
Is the site less than 0.25 hectares in area?	no	NO
Is the site already at an advanced stage in the planning process? (Development commenced)		NO
Stage 1 Conclusion		
No clear conflicts with national policy or insurmountable environmental constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	++	Vehicle access to site already exists.

2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site adjoins the urban area with existing pedestrian and cycling connections.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility*:* public transport (bus)** Distance to nearest bus stop	++	Distance to the nearest bus stop is within 800m (350m)
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility*:* public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	-	Distance to the nearest train station is more than 20 minutes [*Parkway]: (6600m)
1) Flooding 13) Climate Change	**Flood Risk**	0	Flood zone: 1
9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	0	No significant physical features identified.
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	-	Potentially significant contamination issues.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?)	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	0	No issues identified
2) Vibrant Communities 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The nearest school is more than 800m away (1100m)
2) Vibrant Communities 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	-	The nearest GP Surgery is more than 800m away (3300m)
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Supra Output Area within the 20% most deprived in England?	0	Site not within one of the most deprived areas in Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	++	Brownfield
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	0	The site is not particularly sensitive in terms of its character.

2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	0	Site is not in close proximity to a listed building, not on the OHAR and is outside the city centre archaeological area.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value? Are there any records of protected species on or near the site?	0	No part of the site has been designated for its biodiversity value.
1) Flooding 2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	**Green Infrastructure** How does the site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure network?	0	Brownfield site
Stage 2 Conclusion			
The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment.			

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.		
Assessment Criteria	**Rating**	**Comments**
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		The site is a category 1 protected employment site. It has no physical policy constraints and is brownfield. However when considered against policy issues in the NPPF the importance of the site in delivering Oxford's economic vision is very relevant as it is a very significant employment site. Oxford has a clear economic vision and a shortage in supply of employment land suggesting that this significant site should not be lost to other uses.

Site/Policy Reference	SP9	Site Location Plan:
Site Name	BMW Garsington Road	
Ward	Lye Valley	
Site Size	69.9ha	
Existing Use	B2/B8	
Landowner(s)	BMW	
Relevant Planning History	17/00139/CONSLT - Application to seek the views of Oxford City Council as to the arrangements for reprovision of existing sporting facilities currently on the Rover Sports and Social Club, Roman Way. THIS IS NOT A PLANNING APPLICATION.	
Source	Protected Key Employment Site	

ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	no	
Is the site greenfield in flood zone 3b?	no	
Is the site less than 0.25 hectares in area?	no	
Is the site already at an advanced stage in the planning process? (Development commenced)	no	
Stage 1 Conclusion		
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	++	Vehicle access to the site already exists.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site adjoins the urban area with existing pedestrian and cycle connections.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	++	The site is less than a 10 minute walk (300m) from the nearest bus stop.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	I	More than 20 minute walk (7400m) to the nearest existing train station, Oxford Station. Potential to be within walking distance of new Cowley branch line station if this is delivered during the plan period.
1) Flooding 13) Climate Change	**Flood Risk**	0	The worst flood zone is flood zone 1 (100%).

9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	0	No significant physical features identified.
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	-	Potentially significant contamination issues.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	-	The site adjoins a railway line, ring road andlarge scale industrial use. Mitigation may be required to minimise impacts.
2) Vibrant Communities 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The site is more than a 10 minute walk (1200m) from the closest primary school.
2) Vibrant Communities 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	-	The site is more than a 10 minute walk (1700m) from the closest GP.
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	0	The site is not within one of the most deprived areas of Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	++	Previously developed land. Development could help to make an efficient use of land.
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	0	The site forms part of a '20th Century Fringe Business, Industry and Retail' townscape and is not near a conservation area. The site is not particularly sensitive in terms of character.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	0	The site is not within close proximity of a listed building, is not listed on the Oxford Heritage Asset Register and is outside of the City Centre Archaeological Area.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value?	0	No part of the site has been designated for its biodiversity value.
1) Flooding 2) Vibrant Communities 4) Human Health	**Green Infrastructure** How does the site perform in the Green Infrastructure Assessment? Is the site	0	The site is brownfield and was therefore not assessed for green infrastructure.

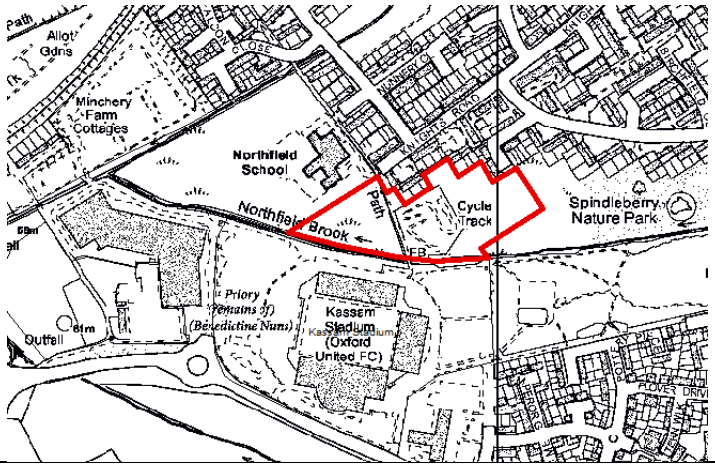
8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	identified as requiring protection as part of Oxford's green infrastructure network?		

Stage 2 Conclusion

The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment. However, any development of the site will need to take into consideration the following issues raised through the sustainability appraisal process:

- Mitigation of neighbouring land uses may be required

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.		
Assessment Criteria	**Rating**	**Comments**
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		Occupied by Mini Plant, although additional employment land could be made available with reorganisations of existing uses. Available for economic use, site has capacity to intensify within its own boundary

Site/Policy Reference	SP16	Site Location Plan:
Site Name	Knights Road	
Ward	Littlemore	
Site Size	2.25ha	
Existing Use	Open Space	
Landowner(s)	Oxford City Council	
Relevant Planning History		
Source	Sites and Housing Plan allocation SP24	

ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	no	
Is the site greenfield in flood zone 3b?	no	
Is the site less than 0.25 hectares in area?	no	
Is the site already at an advanced stage in the planning process? (Development commenced)	no	
Stage 1 Conclusion		
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	++	Vehicle access to the site already exists.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site is within the urban area with existing pedestrian and cycle connections. However, improved walking and cycling connections are likely to be required.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	++	The site is less than a 10 minute walk (140m) from the nearest bus stop.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	I	There is potential for the site to be within walking distance of a new Cowley branch line station if this is delivered during the plan period.
1) Flooding 13) Climate Change	**Flood Risk**	--	The worst flood zone is 3b
9) Biodiversity	**Topography**	o	No significant physical features identified.

10) Urban Design & Heritage 12) Water & Soil	Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?		
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	-	Former landfill. Some land contamination issues likely.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	-	Site close to stadium. Likely to be affected by Stadium event noise.
2) Vibrant Communities 3) Housing 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The nearest primary school is more than a 10 minute walk (900m) away.
2) Vibrant Communities 3) Housing 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	-	The nearest GP surgery is more than a 10 minute walk (1,000m) away.
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Supra Output Area within the 20% most deprived in England?	0	The site is not within one of the most deprived areas of Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	++	Brownfield site. Development could help to make a more efficient use of land.
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	0	The site is not particularly sensitive in terms of character.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	-	The site is not within close proximity of a listed building, is not listed on the Oxford Heritage Asset Register. However, the site is of high archaeological potential. The locality is dense with multi-period remains including Iron Age Settlement, Roman pottery manufacturing sites and dispersed early Saxon Settlement.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value? Are there any records of protected species on or near the site?	0	OCWS adjacent to the site. Ecology corridor.
1) Flooding	**Green Infrastructure** How does the	0	Brownfield site that has not been assessed as part

2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure network?		of the Green Infrastructure Study.

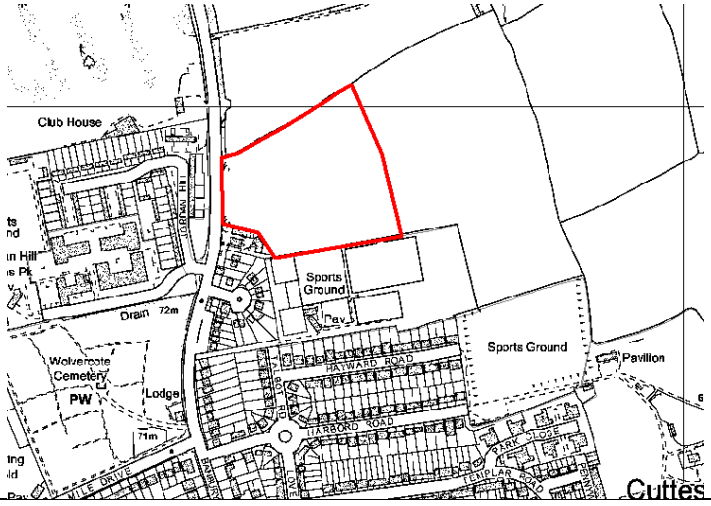
Stage 2 Conclusion

The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment. However, any development of the site will need to take into consideration the follow issues raised through the sustainability appraisal process:

- 5% of site falls within flood zone 3b

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.

Assessment Criteria	Rating	Comments
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		Site is owned by Oxford City Council. The City Council is in the process of selecting a developer partner to both master plan and take forward the development of the site.

Site/Policy Reference	SP25	Site Location Plan:
Site Name	St Frideswide Farm	
Ward	Wolvercote	
Site Size	3.95ha	
Existing Use	Greenbelt agricultural land	
Landowner(s)	Croudace Homes/Christ Chuch	
Relevant Planning History		
Source	Call for Sites 2014; Call for sites 2016	

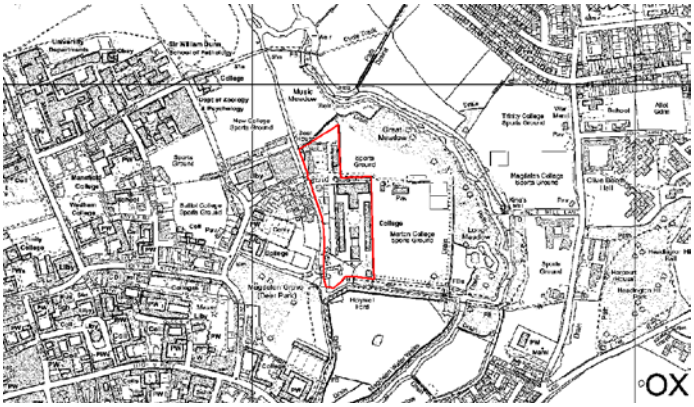
ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	no	
Is the site greenfield in flood zone 3b?	no	
Is the site less than 0.25 hectares in area?	no	
Is the site already at an advanced stage in the planning process? (Development commenced)	no	
Stage 1 Conclusion		
This site is in the Green Belt and so would be subject to Green Belt exceptional circumstances being demonstrated and the Green Belt review; beyond this issue there are no clear conflicts with national policy or insurmountable environmental constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	+	Site adjoins Banbury Road
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	Site is on the edge of the urban area with existing pedestrian and cycle connections on the main road frontage. Creation of new pedestrian/cycle connections into the site would be required.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	++	The site is less than a 10 minute walk from the closest bus stop (50m)
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	+	The site is a 10-20 minute walk to the closest train station (Oxford Parkway – 1000m). This site would benefit from improved pedestrian/cycle access to Oxford Parkway,
1) Flooding 13) Climate Change	**Flood Risk**	0	The site is located within Flood zone 1 (100%).
9) Biodiversity 10) Urban Design	**Topography**	0	No significant physical features identified.

& Heritage 12) Water & Soil	Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?		
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?		Land currently in agricultural use – land contamination issues unlikely.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	I	Site adjoins residential uses – design sensitivity would be required.
2) Vibrant Communities 3) Housing 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The nearest primary school is more than a 10 minute walk away (1600m).
2) Vibrant Communities 3) Housing 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	-	The nearest GP is more than a 10 minute walk away (2400m).
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	0	Site not within one of the most deprived areas of Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	-	Greenfield
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	0	Site not particularly sensitive in terms of character.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	0	Site is not within close proximity of a listed building and is outside the city centre archaeological area.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value? Are there any records of protected species on or near the site?	0	Site is not in close proximity to an area designated for its biodiversity value and there are no records of protected species.
1) Flooding	**Green Infrastructure** How does the	0	Assessed for GI but not identified for GI

2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure network?		protection. Private agricultural land. A public right of way runs from the eastern boundary of the site, but otherwise the site is of low amenity value. The site is of low biodiversity value, low flood management value (100% flood zone 1) and is of low landscape/character value.
Stage 2 Conclusion			
The site generally scores moderately against the sustainability criteria and should continue on to the stage 3 assessment.			

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.		
Assessment Criteria	**Rating**	**Comments**
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		Site is suitable. Landowner has indicated (Call for sites 2016) that site is available with preferred use as residential.

Site/Policy Reference	SP31	Site Location Plan:
Site Name	St Catherine's College	
Ward	Holywell	
Site Size	4.71 ha	
Existing Use	Educational facilities	
Landowner(s)	St Catherine's College	
Relevant Planning History	Planning appeal allowed 2002 for student accommodation an academic uses	
Source	Call for Sites 2016	

ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	no	
Is the site greenfield in flood zone 3b?	no	
Is the site less than 0.25 hectares in area?	no	
Is the site already at an advanced stage in the planning process? (Development commenced)	no	
Stage 1 Conclusion		
A portion of this site is in the Green Belt and so development of that section would be subject to Green Belt exceptional circumstances being demonstrated and the Green Belt review; beyond this issue there are no clear conflicts with national policy or insurmountable environmental constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	++	Vehicle access to the site already exists.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site is within the urban area with existing pedestrian and cycle connections.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	-	The site is more than a 10 minute walk (950m) from the nearest bus stop.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	-	The site is more than a 20 minute walk (2000m) from the nearest train station.
1) Flooding 13) Climate Change	**Flood Risk**	--	The worst flood zone is flood zone 3b (brownfield)
9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground	-	Trees cover less that 50% of the site, and it is bordered by the River Cherwell along one edge.

	level?		
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	-	Land previously used as landfill – some land contamination issues likely.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	I	Site adjoins residential uses – design sensitivity required.
2) Vibrant Communities 3) Housing 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The site is more than a 10 minute walk (2200m) from the closest primary school.
2) Vibrant Communities 3) Housing 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	-	The site is more than a 10 minute walk (1200m) from the closest GP.
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	0	Site is not within one of the most deprived areas of Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	+-	Mixed greenfield/brownfield site, impact would depend on design and layout of development.
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	-	The site is in the Central Conservation Area. Impact of development on the character of the area would depend on design.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	-	Site contains a grade I listed building. The impact of development on the listed building would depend on design. General archaeological potential, as a medieval (?) causeway is located at the northern end of the parcel and should be respected.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value?	-	The site adjoins a Local Wildlife Site. Any impacts of development would need to be carefully considered.
1) Flooding 2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure	**Green Infrastructure** How does the site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure	0	Greenfield parts of the site not identified for protection as GI

9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	network?		

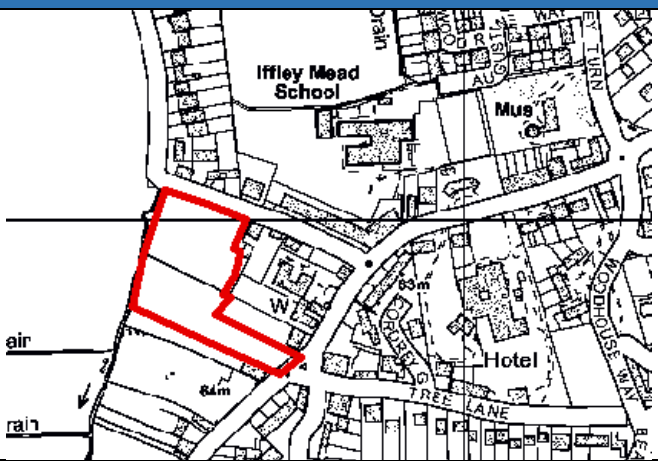
Stage 2 Conclusion

The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment. However, any development of the site will need to take into consideration the following issues raised through the sustainability appraisal process:

- The site falls within flood zone 3b (brownfield)
- The site includes existing trees
- There is potential for land contamination issues
- Design sensitivity may be required taking into consideration neighbouring land uses
- Design sensitivity may be required taking into consideration the site's location in a conservation area and proximity to a heritage asset
- The site adjoins an area designated for its biodiversity value

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.

Assessment Criteria	Rating	Comments
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		Planning permission granted in October 17 for 78 student bedrooms plus a three storey graduate centre (17/00758/FUL).

Site/Policy Reference	SP43	Site Location Plan:
Site Name	**Land at Meadow Lane**	
Ward	Rose Hill and Iffley	
Site Size	0.989ha	
Existing Use	Green undeveloped land	
Landowner(s)	Donnington Hospital Trust	
Relevant Planning History		
Source	Sites and Housing Plan Rejected site; LP call for sites	

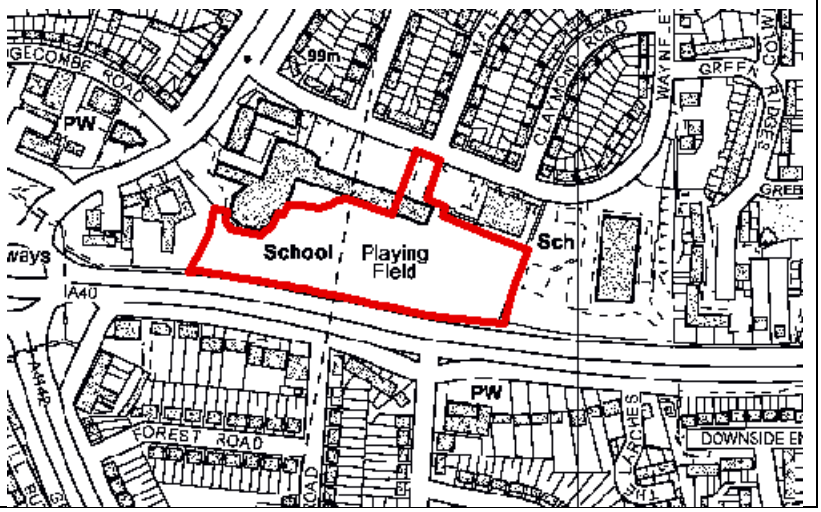
ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site less than 0.25 hectares in area?	No	
Is the site already at an advanced stage in the planning process? (Development commenced)	No	
Stage 1 Conclusion		
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	+	The site adjoins an existing road.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site is within the urban area with existing pedestrian and cycle connections.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility*:* public transport (bus)** Distance to nearest bus stop	++	The site is less than a 10 minute walk (100m) from the nearest bus stop.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility*:* public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	-	The site is more than a 20 minute walk (4,000m) from the nearest train station.
1) Flooding 13) Climate Change	**Flood Risk**	--	The worst flood zone is flood zone 3b.
9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	-	Some existing trees. Trees cover less than 50% of the site.

4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	0	Current land use suggests that land contamination issues are unlikely.
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	I	The site adjoins residential dwellings. Design sensitivity required.
2) Vibrant Communities 3) Housing 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	-	The site is more than a 10 minute walk (1,200m) from the closest primary school.
2) Vibrant Communities 3) Housing 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	+	The site is less than a 10 minute walk (750m) from the closest GP.
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	0	The site is not within one of the most deprived areas of Oxford.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	-	Greenfield
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	--	The site is located within the Iffley Village Conservation Area. The conservation area appraisal identifies this area as being of particular significance to the conservation area's rural character. Development is unlikely to be possible without a significantly negative effect on the conservation area.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register? Is the site likely to have archaeological interest?	0	The site is not within close proximity of a listed building, is not listed on the Oxford Heritage Asset Register and is outside of the City Centre Archaeological Area.
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value?	0	No part of the site has been designated for its biodiversity value.
1) Flooding 2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity	**Green Infrastructure** How does the site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure network?	0	Greenfield site that has not been identified for protection as green infrastructure. This private animal grazing space is connected via an adjacent PROW. The site is unimportant to flood management as, although it contains some 3b FZ area, it is largely in FZ 1. The site also has no

11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism			biodiversity designations or functions. It is in an area of moderate landscape value; however, this site is of particular significance in retaining the rural aesthetic of the area.
Stage 2 Conclusion			
The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment.			

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.		
Assessment Criteria	**Rating**	**Comments**
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		The site is available. The site was proposed by the landowner at the Sites and Housing Plan stage. It has also been put forward in the Local Plan call for sites for housing.

Site/Policy Reference	SP65	Site Location Plan:
Site Name	**Bayards Hill Primary School Playing Fields**	
Ward	Barton and Sandhills	
Site Size	1.96ha	
Existing Use	School playing fields	
Landowner(s)	Community School Alliance	
Relevant Planning History		
Source	Protected Open Space, SR2	

ASSESSMENT STAGE 1: Excludes sites due to clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints		
Assessment Criteria	**Outcome**	**Comments**
Is the site a SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site less than 0.25 hectares in area?	No	
Is the site already at an advanced stage in the planning process? (Development commenced)	No	
Stage 1 Conclusion		
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.		

ASSESSMENT STAGE 2: Sustainability Appraisal and qualitative assessment of deliverability			
SA Objective(s)	**Assessment Criteria**	**Rating**	**Comments**
Physical Criteria			
7) Essential Services/Facilities 11) Transport, Air	**Accessibility: vehicle access** Can access for vehicles be achieved?	++	Vehicle access to the site already exists.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: walking and cycling** Can walking and cycling connections with the surrounding area be achieved?	+	The site is located within the urban area with existing pedestrian and cycle connections.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (bus)** Distance to nearest bus stop	++	The site is less than a 10 minute walk (100m) from the nearest bus stop.
2) Vibrant Communities 4) Human Health 11) Transport, Air	**Accessibility: public transport (train)** Distance to nearest train station (Oxford Station, Oxford Parkway Station)	-	The site is more than 20 minute walk from the nearest train station.

1) Flooding 13) Climate Change	**Flood Risk**	0	The worst flood zone is flood zone 1 (100% of the site falls within FZ1)
9) Biodiversity 10) Urban Design & Heritage 12) Water & Soil	**Topography** Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	0	No significant physical features identified.
4) Human Health 12) Water & Soil	**Contamination** Are land contamination issues likely?	0	Current land use suggests that contamination issues are unlikely (site currently in use as school playing fields)
4) Human Health 11) Transport, Air	**Air Quality** Is the site within the Air Quality Management Area?	-	An Air Quality Management Area designation covers the entire city of Oxford.
4) Human Health 10) Urban Design & Heritage	**Neighbouring Land Uses** Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	I	The site adjoins a residential area. Design sensitivity required should the site be required for development.
2) Vibrant Communities 5) Inequality 6) Education 7) Essential Services/Facilities 11) Transport, Air	**Distance to nearest primary School**	+	The site is less than a 10 minute walk (50m) from the closest primary school.
2) Vibrant Communities 5) Inequality 7) Essential Services/facilities 11) Transport, Air	**Distance to nearest GP surgery**	+	The site is less/more than a 10 minute walk (750m) from the closest GP.
2) Vibrant Communities; 5) Inequality 14) Economy and Employment	**Regeneration** Is the site located within a Lower Super Output Area within the 20% most deprived in England?	+	The site is within one of the most deprived areas of Oxford. There is a potential for development to support wider regeneration aims.
Environmental Criteria			
2) Vibrant Communities 10) Urban Design & Heritage	**Land Type** Is the site previously developed land or greenfield?	-	Greenfield site.
2) Vibrant Communities 8) Green Spaces, Sports & Leisure 10) Urban Design & Heritage 15) Sustainable Tourism	**Townscape/Landscape Character** Could development harm or enhance the character of the area?	0	The Landscape Character area describes the area as Inter-war/ Post-war Suburbs. The site is not particularly sensitive in terms of character.
2) Vibrant Communities 10) Urban Design & Heritage 15) Sustainable Tourism	**Heritage assets** Does the site include a listed building or fall within the setting of a listed building? Is any part of the site listed on the Oxford Heritage Asset Register?	0	The site is not within close proximity of a listed, building, is not listed on the Oxford Heritage Asset Register and is outside of the City Centre Archaeological Area.

	Is the site likely to have archaeological interest?		
8) Green Spaces, Sports & Leisure 9) Biodiversity 12) Water & Soil	**Biological/Geological Importance** Is any part of the site designated for its biodiversity value?	0	No part of the site has been designated for its biodiversity value.
1) Flooding 2) Vibrant Communities 4) Human Health 8) Green Spaces, Sports & Leisure 9) Biodiversity 11) Transport, Air 12) Water & Soil 10) Urban Design & Heritage 15) Sustainable Tourism	**Green Infrastructure** How does the site perform in the Green Infrastructure Assessment? Is the site identified as requiring protection as part of Oxford's green infrastructure network?	0	This site is currently in use a school playing field. The site is of low biodiversity value, low flood risk (100% in FZ1), and is in an area assessed as having a low landscape character value. The site is a greenfield site that has not been identified for protection as green infrastructure. The site benefits from policy protection as a school playing field.
Stage 2 Conclusion			
The site generally scores well against the sustainability criteria and should continue on to the stage 3 assessment. However, any development of the site will need to take into consideration the following issues raised through the sustainability appraisal process: • Design sensitivity may be required taking into consideration neighbouring land uses			

ASSESSMENT STAGE 3: Qualitative assessment of deliverability and consideration of potential sustainability impacts. Identification of preferred options.		
Assessment Criteria	**Rating**	**Comments**
Deliverability Is the site likely to become available during the plan period? Any indication of intention to develop? How would development of the site be considered against policies in the NPPF and the Oxford Local Plan 2036 strategy?		Landowner (Community Schools Alliance Trust) is supportive of part of the school playing fields which is surplus to the school's needs being developed for key worker housing

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Planning Policy

Appendix 2ii

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OXFORD CITY COUNCIL

Oxford Local Plan 2036

Habitats Regulations Assessment:

Appropriate Assessment

September 2018

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1. Introduction

1.1 This report discusses Stage 2 (appropriate assessment) of the Habitat Regulations Assessment (HRA) for the Oxford Local Plan 2036.

1.2 The Oxford Local Plan sets out policies relating to development, site allocations and development management. It:

- Sets a capacity based target aimed at meeting as much of the objectively assessed housing need (OAN) as possible by boosting housing supply balanced with appropriate consideration of other policy aims. The Local Plan proposes 8,620 (431 per year) homes, which is likely to generate a population increase of around 20,000 people. Adjacent authorities will be providing the balance of the OAN.
- Promotes more than 2,000 car-free homes: student accommodation, employer-linked housing, and other housing in easily-accessible areas.
- Proposes to release 8 sites totalling 17.45 hectares in total from the Oxford's Green Belt.
- Protects key employment sites (category 1 and 2) from the loss to other non-employment uses.
- Allows employment sites that are not considered key to the Oxford's economy to be redeveloped eg for housing.
- Requires air quality assessments for all major proposals.
- Encourages the provision of electric charging points.
- Protects existing green and blue infrastructure features, and supports the development of new green infrastructure features.

Requirements of the Habitats Directive

1.3 Appropriate Assessment of plans that could affect Special Conservation Areas (SACs), Special Protection Areas (SPAs), and Ramsar sites (jointly called 'European sites) is required by Article 6(3) of the European Habitats Directive[1], which states:

> *'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of this assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'*

[1] Directive 92/42/EEC on the Conservation of Natural Habitats and Wild Fauna

1.4 Article 6(4) of the Habitats Directive discusses alternative solutions, the test of 'imperative reasons of overriding public interest' (IROPI) and compensatory measures:

> *'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natural 2000 is protected. It shall inform the Commission of the compensatory measures adopted.*

1.5 The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted if it can be shown that they will have no significant adverse effect on the integrity of any European site, or if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

1.6 The Habitats Directive was implemented into UK legislation through the Conservation (Natural Habitats, & c) Regulations 1994. The currently relevant piece of legislation is the 'Conservation of Habitats and Species Regulations 2010 (as amended) and is generally known as the Habitats Regulations.

Stage 1 screening

1.7 A Habitat Regulations Assessment can involve up to a four stage process.

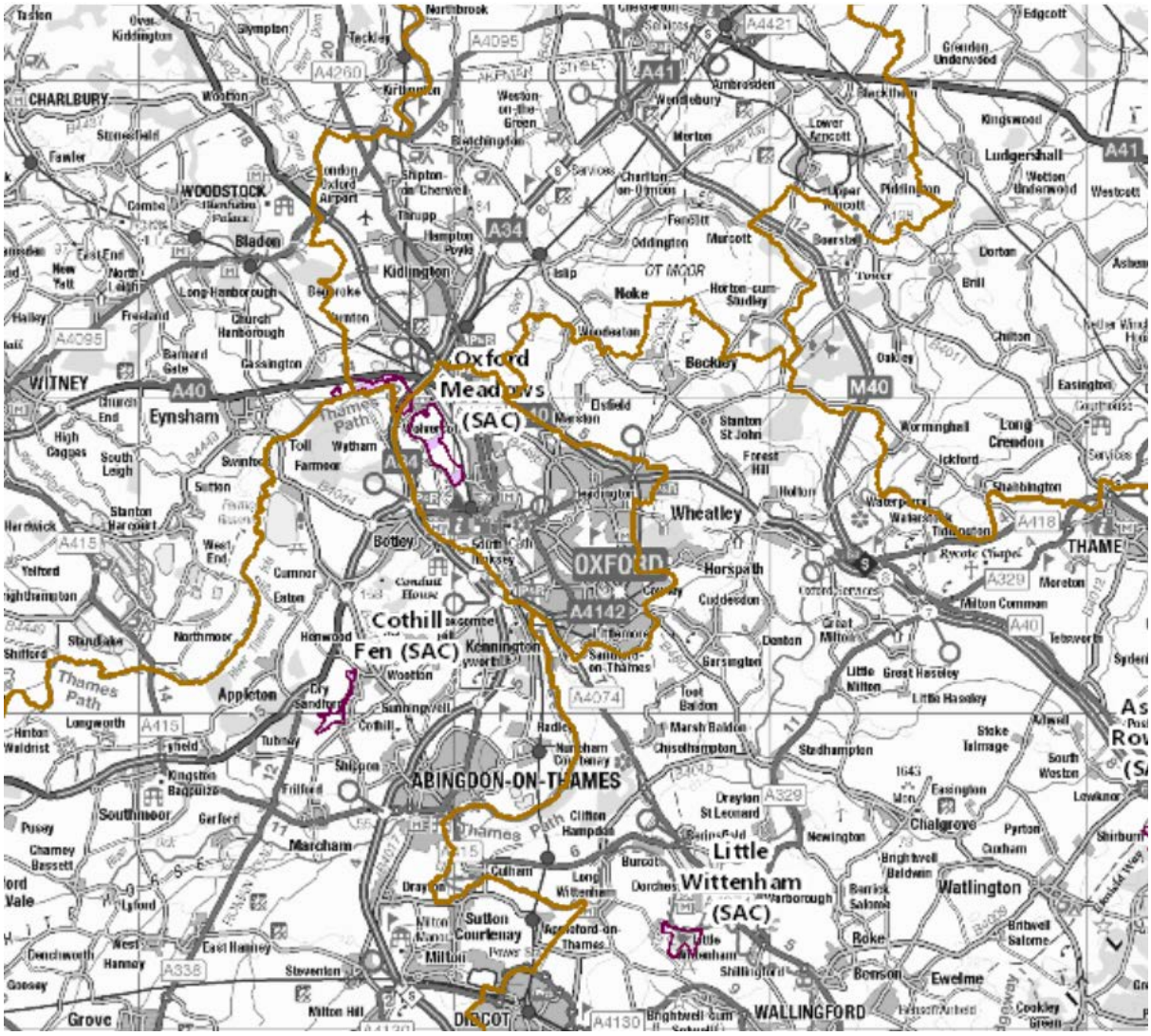
1. **Screening**. Determining whether or not a plan 'alone or in-combination' is likely to have a significant effect on a European site.
2. **Appropriate Assessment**. Determining whether, in view of the site's conservation objectives, the plan 'alone or in-combination' would have an adverse effect (or risk of this) on the integrity of the site. If not, the plan can proceed.
3. **Assessment of alternative solutions**. Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site, there should be an examination of alternatives.
4. **Assessment where no alternative solutions remain and where adverse impacts remain**.

1.8 Oxford City Council prepared a stage 1 screening report – shown at **Appendix A** - in October 2017. It considered the three European sites within 20km of the Oxford City Council administrative boundary (Table 1.1 and Figure 1.1). For the Cothill Fen SAC and the Little Wittenham SAC, it found that the Oxford Local Plan 2036 does not propose any policies or new allocations that would have a likely significant effect on those SACs, and it screened those two designated sites out of any further assessment.

Table 1.1 – European Sites within 20km of Oxford City Council boundary		
Name of site	Distance from boundary	Reason for designation[2]
Oxford Meadows SAC	Within City Boundary, extending into administrative area for Cherwell District Council and into the administrative boundary of West Oxfordshire District Council.	**Annex I habitats that are a primary reason for selection of this site** **6510 Lowland hay meadows** (Alopecurus pratensis, Sanguisorba officinalis) Together with North Meadow and Clattinger Farm, also in southern England, Oxford Meadows represents **lowland hay meadows** in the Thames Valley centre of distribution. The site includes vegetation communities that are perhaps unique in the world in reflecting the influence of long-term grazing and hay-cutting on **lowland hay meadows**. The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. **Annex II species that are a primary reason for selection of this site** 1614 **Creeping marshwort** Apium repens Oxford Meadows is selected because Port Meadow is the larger of only two known sites in the UK for **creeping marshwort *Apium repens***.
Cothill Fen SAC	Located 7km from the city boundary	**Annex I habitats that are a primary reason for selection of this site** **7230 Alkaline fens** This lowland valley mire contains one of the largest surviving examples of **alkaline fen** vegetation in central England, a region where fen vegetation is rare. The M13 *Schoenus nigricans – Juncus subnodulosus* vegetation found here occurs under a wide range of hydrological conditions, with frequent bottle sedge *Carex rostrata*, grass-of-Parnassus *Parnassia palustris*, common butterwort *Pinguicula vulgaris* and marsh helleborine *Epipactis palustris*. The alkaline fen vegetation forms transitions to other vegetation types that are similar to M24 *Molinia caerulea – Cirsium dissectum* fen-meadow and S25 *Phragmites australis – Eupatorium cannabinum* tall-herb fen and wet alder *Alnus* spp. wood.
Little Wittenham SAC	Located 19km from the city boundary	**Annex II species that are a primary reason for selection of this site** 1166 **Great crested newt** Triturus cristatus

[2] Source www.jncc.gov.uk

		One of the best-studied great crested newt sites in the UK, Little Wittenham comprises two main ponds set in a predominantly woodland context (broad-leaved and conifer woodland is present). There are also areas of grassland, with sheep grazing and arable bordering the woodland to the south and west. The River Thames is just to the north of the site, and a hill fort to the south. Large numbers of **great crested newts *Triturus cristatus*** have been recorded in the two main ponds, and research has revealed that they range several hundred metres into the woodland blocks.

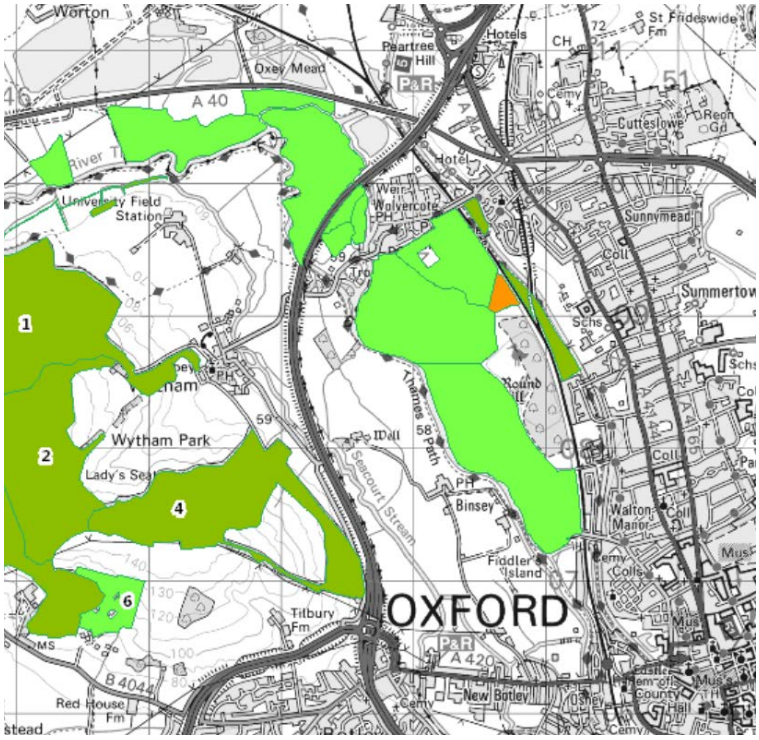

CHARLBURY
WOODSTOCK
Bladon
WITNEY
Eynsham
Oxford Meadows (SAC)
Cothill Fen (SAC)
ABINGDON-ON-THAMES
Little Wittenham (SAC)
Wheatley
OXFORD
Kidlington
Cumnor
Botley
Appleton
Marcham
Sutton Courtenay
Abingdon-on-Thames
Milton
DIDCOT
WALLINGFORD
Watlington
Chalgrove
Beckley
Horspath
Cuddesdon
Garsington
Stadhampton
Berinsfield
Dorchester
Benson
Ewelme
Brightwell Baldwin
Brightwell cum Sotwell
Forest Hill
Stanton St John
Oakley
Thame
Long Crendon
Kingswood
Ludgershall
Brill
Horton-cum-Studley
Noke
Islip
Oddington
Marsh Baldon
Toot Baldon
Little Milton
Great Milton
Milton Common
Shillingford
Newington
Drayton St Leonard
Clifton Hampden
Culham
Burcot
Long Wittenham
Little Hasley
Great Haseley
Stoke Talmage
Pyrton
Cuxham
Watlington
Britwell Salome
Cookley Green
Lewknor
Postcombe
Tetsworth
Ickford
Shabbington
Worminghall
Waterperry
Tiddington
Ryecote Chapel
Moreton
Easington
Chilton
Dorton
Ashendon
Westcott
Upper Arncott
Lower Arncott
Piddington
Boarstall
Ambrosden
Blackthorn
Wendlebury
Merton
Arncott
Weston-on-the-Green
Bletchington
Stratton Audley
Fringford
Caversfield
Bicester
Launton
Graven Underwood
Edgcott
Northbrook
Tackley
Sympton
Over Kiddington
Nether Kiddington
Enslow
Stonesfield
Fawler
Combe
Woodstock
Blenheim Palace
Hampton Poyle
Shipton-on-Cherwell
Thrupp
Kidlington
Begbroke
Yarnton
Cassington
Long Hanborough
Church Hanborough
Freeland
Hailey
Barnard Gate
East End
North Leigh
New Yatt
Witney
Church End
High Cogges
South Leigh
Stanton Harcourt
Yelford
Standlake
Northmoor
Shifford
Longworth
Hanborough
Waldrist
Kingston Bagpuize
Southmoor
Pusey
Charney Bassett
Lyford
Denchworth
West Hanney
East Hanney
Hanney
Goosey
Grove
Steventon
Milton Hill
Drayton
Sutton Courtenay
Appleford-on-Thames
Abingdon-on-Thames
Culham
Long Wittenham
Little Wittenham
Clifton Hampden
Burcot
Dorchester
Shillingford
Benson
Ewelme
Brightwell cum Sotwell
Cookley Green
Watlington
Britwell Salome
Chalgrove
Pyrton
Cuxham
Lewknor
Postcombe
Tetsworth
Thame
Ickford
Shabbington
Worminghall
Long Crendon
Kingswood
Ludgershall
Brill
Horton-cum-Studley
Noke
Islip
Oddington
Marsh Baldon
Toot Baldon
Little Milton
Great Milton
Milton Common
Shillingford
Newington
Drayton St Leonard
Clifton Hampden
Culham
Burcot
Long Wittenham
Little Hasley
Great Haseley
Stoke Talmage
Pyrton
Cuxham
Watlington
Britwell Salome
Cookley Green
Lewknor
Postcombe
Tetsworth

1.9 However the screening report found that the integrity of Oxford Meadows SAC could potentially be affected by the Local Plan, and this should be considered further in an appropriate assessment. In a letter of 24 November 2017, Natural England agreed with the overall findings and offered advice on how this should be done. This is covered further in Chapter 4.

1.10 This report consequently covers stage 2 (appropriate assessment) of the HRA for the Oxford Local Plan 2036. The screening report is shown at Appendix 1.

Oxford Meadows SAC

1.11 Table 1.1 explains the reasons for which the Oxford Meadows have been designated as an SAC. As can be seen at Figure 12, the SSSI units that make up Oxford Meadows SAC are in favourable condition, except for a small area in unfavourable recovering condition. This assessment was from July 2010 and may well have changed in the intervening time.[3]



1.12 The following are the key requirements to support the integrity of the Oxford Meadows SAC[4]:

- Minimal air pollution;
- Absence of nutrient enrichment of waters/ good water quality;
- Balanced hydrological regime – alteration to adjacent rivers may alter flooding regime and botanical diversity;
- Maintenance of traditional hay cut and aftermath grazing;
- Absence of direct fertilisation;

[3] Web-link to condition of SSSI units https://designatedsites.naturalengland.org.uk/
[4] Originally agreed at a screening workshop for the South East Plan

- Ensuring recreational impacts are maintained at a reasonable level[5];

1.13 In addition to the above requirements, this HRA considers the vulnerabilities listed in the Natura 2000 – Standard Data Form for the Oxford Meadows SAC submitted by DEFRA to the European Commission in December 2015[6]. This form states that the Oxford Meadows SAC is vulnerable to impacts from the following sources:

- Pollution to surface waters (limnic & terrestrial, marine & brackish);
- Invasive non-native species; and,
- Human induced changes in hydraulic conditions.

1.14 Requirements for the maintenance of traditional hay cut and light aftermath grazing; and the absence of direct fertilisation are related only to the management of the SAC. They are not affected by the location of, for example, housing or employment development.

1.15 Also, the control of invasive species cannot be easily influenced by the planning regime. A Site Improvement Plan for the Oxford Meadows SAC[7] issued by Natural England in December 2014 highlights that the rare *Apium repens* could be affected by *Crassula* and other invasive species. However, the Plan does not indicate that the concern of C*rassula* spreading to the lower areas of Port Meadow could be dealt by control mechanisms directly linked to, or facilitated by new development. Instead, the Plan suggests that these mechanisms need to be identified at the national level. The other requirements are the subject of this report.

1.16 As such, the screening report concluded that maintenance of traditional hay cut and light aftermath grazing, and absence of direct fertilisation could be screened out, as they are related to activities directly at the site, which the Oxford Local Plan 2036 will not affect. However it concluded that the Local Plan had the potential to impact on:

- Recreational pressure;
- Water levels and water quality; and
- Air pollution

at the Oxford Meadows SAC. These will be discussed further at, respectively, Sections 2, 3 and 4.

The Oxford Local Plan

1.17 For the HRA of the Core Strategy, Natural England recommended that the effects of the plan be categorised in the form of a schedule. This approach has been adopted for the Oxford Local Plan 2036. This allows policies with no negative effect on European sites to be eliminated (screen out) from further appraisal, so that the appraisal can concentrate on those policies with possible effects.

1.18 The schedule previously applied by the City Council is as follows:

[5] Raised at a an HRA workshop for the Oxford Core Strategy
[6] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012845.pdf
[7] Available at: http://publications.naturalengland.org.uk/publication/4942743310696448

A – Policies or proposals cannot have any negative impact
B – Effects will be addressed in assessments "down the line", including project assessment under Regulation 48
C – Could have an effect, but would not be likely to have a significant (negative) effect (alone or in combination with other plans or projects)
D – Likely to have a significant effect alone and would require an Appropriate Assessment
E – Likely to have a significant effect in combination with other plans or projects and which require Appropriate Assessment of those combinations
F – Likely to have a significant effect, alone or in combination with other plans or projects, but which would not adversely affect the integrity of a European site
G – Likely to have a significant effect, alone or in combination with other plans or projects, and for which it cannot be ascertained that they would not adversely affect the integrity of a European site

1.19 Table 2.2a of the screening report (Appendix A) shows the results of applying the schedule to the Local Plan preferred options, with detailed explanations of the results. Table 1.2 is based on the findings of the screening report, and does not repeat the detailed findings. However it adds a category:

M – Policy that acts as an avoidance or mitigation measure for impacts on the integrity of the SAC

Table 1.3 does the same, but related to development sites allocated in the Local Plan.

Table 1.2 - Key environmental considerations that could affect the integrity of the Oxford Meadows SAC as a result of a policy in the Oxford Local Plan

	Recreational	Hydro. regime	Water quality	Air quality
2. ECONOMY				
E1 Employment sites	A	A	A	A
E2 Teaching and research	A	A	A	A
E3 New academic floorspace	A	A	A	A
E4 Opportunities for local	A	A	A	A
3. HOUSING				
H1 Scale of housing prov.	D	D	D	D
H2 Affordable housing	A	A	A	A
H3 Employer-linked	A	A	A	M
H4 Mix of dwelling sizes	A	A	A	A
H5 Loss of dwellings	A	A	A	A
H6 HMOs	A	A	A	A
H7 Community-led and self	A	A	A	A
H8 New student accommodat	A	A	A	M
H9 Linking delivery of new	A	A	A	A
H10 Accessible & adaptable	A	A	A	A
H11 Older person	A	A	A	A
H12 Travelling community	A	A	A	A
H13 Boat dwellers	D	A	A	A
H14 Privacy, daylight	A	A	A	A
H15 Internal space standards	A	A	A	A
H16 Outdoor amenity space	A	A	A	A
4. RESOURCES AND ENVIRONMENT				
RE1 Sust design & construc	A	A	A	A

Table 1.2 - Key environmental considerations that could affect the integrity of the Oxford Meadows SAC as a result of a policy in the Oxford Local Plan				
	Recreational	**Hydro. regime**	**Water quality**	**Air quality**
RE2 Efficient use of land	A	A	A	A
RE3 Flood risk management	A	M	A	A
RE4 Sustainable urban drainage	A	M	M	A
RE5 Health, wellbeing, HIA	A	A	A	A
RE6 Air quality	A	A	A	M
RE7 Managing impact	A	A	A	A
RE8 Noise and vibration	A	A	A	A
RE9 Contaminated land	A	A	A	A
5. GREEN SETTING				
G1 Protect of blue, green	A	A	A	A
G2 Protect of biodiversity	A	A	A	A
G3 Green Belt	A	A	A	A
G4 Allotments, food grow	A	A	A	A
G5 Outdoor sports	A	A	A	A
G6 Residential garden land	A	A	A	A
G7 Other green/open space	A	A	A	A
G8 Protect existing GI	A	A	A	A
G9 New and enhanced GI	M	A	A	A
6. HERITAGE				
DH1 High quality design	A	A	A	A
DH2 Views & building heights	A	A	A	A
DH3 Desig heritage assets	A	A	A	A
DH4 Archaeologic. remains	A	A	A	A
DH5 Local Heritage Assets	A	A	A	A
DH6 Shopfronts and signs	A	A	A	A
DH7 External servicing feat	A	A	A	A
7. EFFICIENT MOVEMENT				
M1 Prioritising walking, cycling	D	A	A	M
M2 Assess & manage devel	A	A	A	A
M3 Motor vehicle parking	A	A	A	M
M4 Electric charging points	A	A	A	M
M5 Cycle parking	A	A	A	A
8. RETAIL, COMMUNITY AND INFRASTRUCTURE				
V1 Vitality of centres	A	A	A	A
V2 Shop frontages City Dist. Centr	A	A	A	A
V3 Covered Market	A	A	A	A
V4 Sustainable tourism	A	A	A	A
V5 Cultural/social activities	A	A	A	A
V6 Infrastructure & communit	A	A	A	A
V7 Utilities	A	A	A	A

Table 1.3 - Key environmental considerations that could affect the integrity of Oxford Meadow SAC as a result of a site allocation in the Oxford Local Plan*				
	Recreational	**Hydro. regime**	**Water quality**	**Air quality**
SP1 Sites in West End	A	A	A	All contributing jointly as part of increase in housing numbers, and associated increased traffic on the A34 and A40
SP2 Osney Mead	D	A	A	
SP3 Cowley Centre	A	A	A	
SP4 Blackbird Leys Central	A	A	A	
SP5 Summer Fields School	A	D	D	
SP6 Diamond Place & Ewert Hous	D	D	D	
SP7 276 Banbury Road	D	D	D	
SP8 Unipart	A	A	A	
SP9 Oxford BMW Mini plant	A	A	A	

Table 1.3 - Key environmental considerations that could affect the integrity of Oxford Meadow SAC as a result of a site allocation in the Oxford Local Plan*				
SP10 Oxford Science Park	A	A	A	
SP11 Oxford Business Park	A	A	A	
SP12 Sandy Lane Recreat. Ground	A	A	A	
SP13 Northfield Hostel	A	A	A	
SP14 Edge of … Oxford Academy	A	A	A	
SP15 Kassam Stadium	A	A	A	
SP16 Knights Road	A	A	A	
SP17 Gov't bldgs & Harcourt Hou	A	A	A	
SP18 Headington Hill Hall	A	A	A	
SP19 Land su St Clements Church	A	A	A	
SP20 Churchill Hospital site	A	A	A	
SP21 Nuffield Orthopaedic Centre	A	A	A	
SP22 Old Road campus	A	A	A	
SP23 Warneford Hospital	A	A	A	
SP24 Marston paddock	A	A	A	
SP25 St. Frideswide Farm	D	D	D	
SP26 Hill View Farm	A	A	A	
SP27 Land west of Mill Lane	A	A	A	
SP28 Park Farm	A	A	A	
SP29 Pear Tree Farm	D	D	D	
SP30 Land east of Redbridge P&R	A	A	A	
SP31 St Catherine's College land	A	A	A	
SP32 Banbury Rd university sites	A	D	D	
SP33 Bertie Place recreat ground	A	A	A	
SP34 Canalside land	D	A	A	
SP35 Court Place gardens	A	A	A	
SP36 Cowley Marsh depot	A	A	A	
SP37 Faculty of Music, St Aldate's	A	A	A	
SP38 Former Barns Rd E allotmen	A	A	A	
SP39 Former Iffley Mead playing f	A	A	A	
SP40 Grandpont car park	A	A	A	
SP41 Jesus College sports ground	A	A	A	
SP42 John Radcliffe Hospital site	A	A	A	
SP43 Land at Meadow Lane	A	A	A	
SP44 Lincoln College sports groun	A	A	A	
SP45 Littlemore Park	A	A	A	
SP46 Manor Place	A	A	A	
SP47 Manzil Way	A	A	A	
SP48 Nielsen, London Road	A	A	A	
SP49 Old power station	D	A	A	
SP50 Oriel College land	A	A	A	
SP51 Oxford Brookes Marston Rd.	A	A	A	
SP52 Oxford Stadium	A	A	A	
SP53 Oxford Univ Press sports gr	A	D	D	
SP54 Pullens Lane	A	A	A	
SP55 Radcliffe Observatory Quart	A	D	D	
SP56 Ruskin College campus	A	A	A	
SP57 Ruskin Field	A	A	A	
SP58 Slade House	A	A	A	
SP59 Summertown House, Apsley	A	D	D	
SP60 Union Street car park	A	A	A	
SP61 Univ of Oxford science area	A	A	A	
SP62 Valentia Rd	A	A	A	
SP63 West Wellington Sq	A	A	A	
SP64 Wolvercote paper mill	D	D	D	
SP65 Bayards Hill primary school	A	A	A	
SP66 William Morris Close sports	A	A	A	

* Based on HRA screening report for Oxford Local Plan 2036

2. Recreational impacts

2.1 Creeping marshworth (*Apium repens*) is a low-growing plant which is only found in two naturally occurring locations in the UK – Oxford Meadows SAC being one - and which relies on trampling by cattle to enlarge its territory. Natural England has previously confirmed that *A. Repens* is not particularly sensitive to trampling but is sensitive to dog-fouling. The increased population that would be housed in Oxford as a result of the Local Plan 2036 could own dogs, and those dogs could potentially have a significant impact on the integrity of the Oxford Meadows SAC. As such, it could be negatively affected by an increase in Oxford's population, as projected by policy H1; the policy on boat dwellers H13; and some proposed housing sites.

2.2 Public consultation carried out by Scott Wilson as part of their 'Oxford City Green Space Study' revealed that residents of Oxford are generally willing to walk approximately 1900m to large green spaces[8]. As such, where a proposed development site is over 1900m away, the site has been screened out for recreational impacts. Non-residential sites within the 1900m buffer have also been screened out, as only residential development is likely to lead to an increase in dog-walkers at the SAC.

2.3 Figure 2.1 and Table 2.1 show those residential sites proposed in the Oxford Local Plan that are within 1900m of the Oxford Meadows SAC. The table also shows the type of accommodation proposed for each site.

[8] At the Thames Basin Heaths SPA – which hosts three species of birds that are sensitive to recreational impacts, notably dogs - visitors arriving on foot were found to tail off rapidly after 1.5km. A correlation of urban development and nightjar (one of the birds) populations was found up to 800m. The assessor at the Examination in Public for the South East Plan suggested that a pragmatic zone for visitors arriving by foot would be 1km, and visitors arriving by car would be 5km. As such, this analysis is quite precautionary compared to a more actively studied SPA affected by recreational visits. Burley P. (2007) *Assessor's Report on Thames Basin Heaths SPA and the Draft Delivery Plan*.

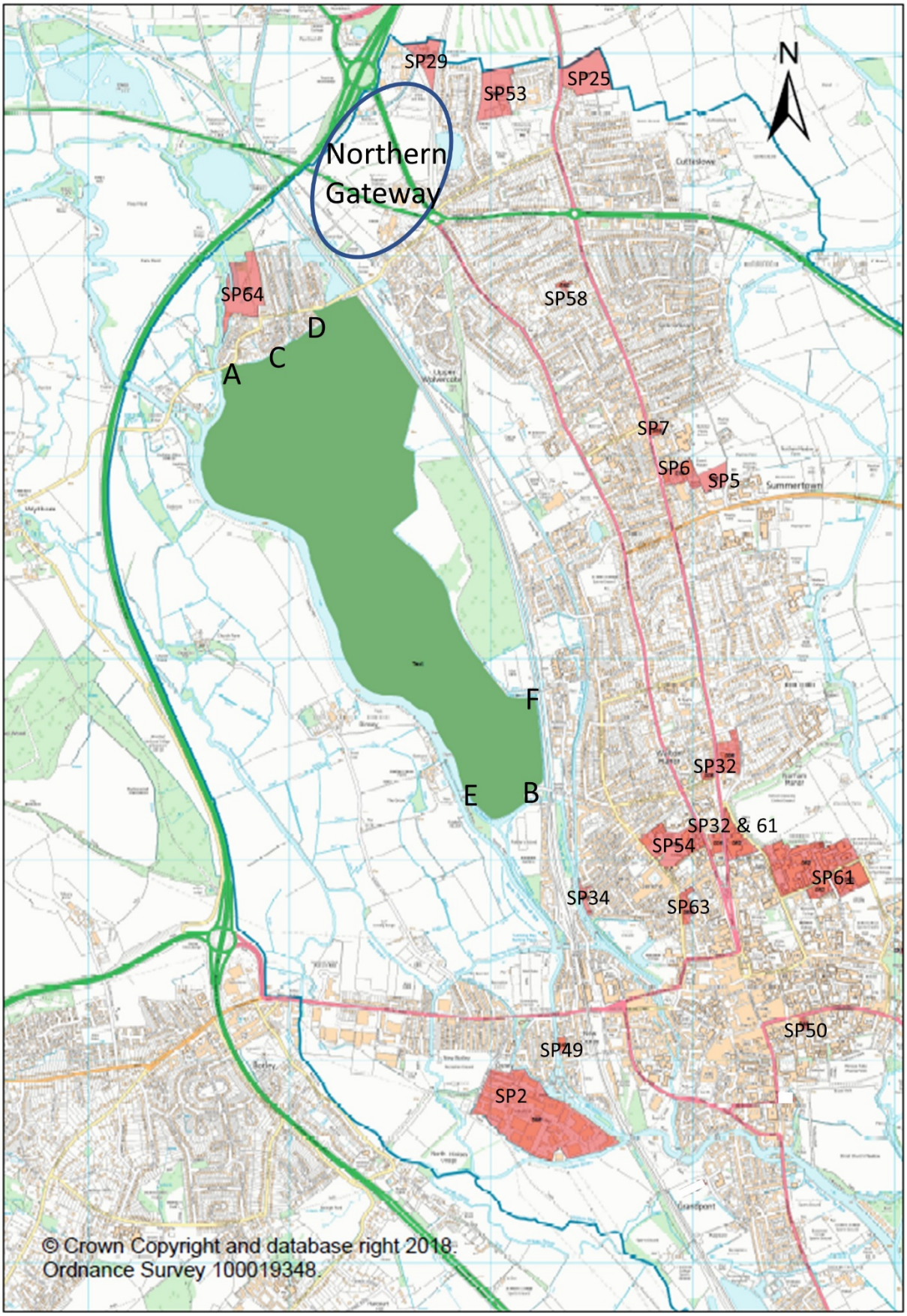


Figure 2.1 Access points to the Oxford Meadows SAC (A-F) and residential sites proposed within 1900m of the SAC (SPxx)

Table 2.1 Residential sites proposed within 1900m of Oxford Meadows SAC			
Site Name	**Distance from SAC (m)**	**No. dwellings**	**Type of accommodation**
SP64 Wolvercote Paper Mill	120	190	'Residential'
SP34 Canalside Land, Jericho	510	22	'Residential'
SP55 Radcliffe Observatory Quarter	560	68	Student, employer-linked
SP32 Banbury Road University Sites	794	80	Student, employer-linked
SP59 Summertown House, Apsley Rd	844	10	Student, employer-linked
SP61 Univ of Oxford Science Area etc.	927	10	Student
SP63 West Wellington Square	890	28	Student, employer-linked
SP53 OUP Sports Ground, Jordan Hill	1,062	55	'Residential'
SP29 Pear Tree Farm	1,069	122	'Residential'
SP49 Old Power Station	1,129	0*	Student, residential
SP7 276 Banbury Road	1,212	35	Housing, student
SP6 Diamond Place & Ewert House	1,238	130	'Residential'
SP2 Osney Mead (Whole Site)	1,240	280	Student, empl-link, market
SP5 Summerfields School athletics site	1,371	120	'Residential'
SP25 St Frideswide Farm	1,477	178	'Residential'
SP50 Oriel College land at King Edward	1,740	7	Student, residential
		1335	

* This number is correct. The landowner has only expressed an interest for short stay residential.

2.4 As recommended by Natural England, a visitor survey to inform this HRA was carried out on six days in October 2017, resulting in 575 interviews. The aim of the survey was to understand how the Oxford Meadows SAC was used by residents of Oxford and by visitors from outside of the city. **Appendix B** shows the results of the visitor survey in full, and they are summarised at Table 2.2. The survey replicates a similar survey carried out in 2011, which resulted in 332 interviews and had broadly similar findings[9].

Table 2.2 Summary of visitor survey	
Total number of visitors recorded during this survey	1,343
Number of surveyed access points	2
Mean number of visitors per surveyed access point	671
Number of hours of surveying per access point	48
Total number of access points to the SAC	6

2.5 In order to interpret the survey data and project the total number of visitors to the site, the calculation shown in Table 2.3 was carried out. The methodology broadly follows that used by Bracknell Forest DC in the Thames Basin Heaths SPA analysis, as recommended by Natural England as best practice.

[9] The October 2011 survey, taken at the same two car parks, showed a higher percentage – 74% as opposed to 67% in 2017 - of visitors coming from OX1 and OX2 postcodes; a similar percentage (38.5 v. 40%) of dog walkers; and more average visits per year (5.8 v. 4.4).

Table 2.3 Projected visitor numbers based on visitor survey			
	Calculation/reference	**Result**	
Total number of visits over survey period	From survey data	A	1,343
Percentage of visits over survey period from within postcode sectors OX1 and OX2[1]	From survey data	B	66.7%
Projected total number of visits, per annum	See Note 2	C	Max 429,240
Projected total number of visits from within postcode sectors OX1 and OX2, per annum	(C÷100) x B	D	286,423
Population of postcode sectors OX1 and OX2	2011 Census	E	65,318
Projected visits per head of OX1 and OX2 population, per annum	D ÷ E	F	Max 4.4[3]
Projected future population arising from new potential development	See Note 4	G	Max 3,204 Potential to own dogs 2,403
Projected visits per annum arising from projected future population	G x F	H	10,573 – 14,098
% of projected future visits, as it relates to current projected total visits	(H÷C) x 100	I	**2.5 – 3.3%**
Projected future population arising from *'in-combination impacts'*	Add to G Northern Gateway 500 homes = 1200 population	J	4,404
Projected visits per annum arising from projected future *'in-combination impacts'* population	F x J	K	Max 19378
% of projected *'in-combination impacts'* visits, as it relates to current projected total visits	(K÷C) x 100	L	**Max 4.5%**

1. This broadly represents a 1900m radius around the Oxford Meadows SAC
2. Mean number of visitors per surveyed access point per hour = 671/48 = 14
Total active hours in day (06:00-20:00) = 14
Projected mean number of visitors per surveyed access point, per day = 14 x 14 = 196
Projected mean number of visitors per surveyed access point, per year = 196 x 365 = 71,540
If all 6 access points had similar number of visitors, then projected total number of visits, per year = 429,240
3. This maximum includes small children, elderly people etc.; the most likely number is less than this.
4. Average household size in Oxford at the time of the 2011 Census was 2.4. Maximum number of homes proposed (1,335 – from Table 2.1) x 2.4 people per home = 3,204 people. Removing students and academic employer-linked accommodation, assuming these comprise 25% of new residents, would result in 2,403 future population that could own dogs.

2.6 Table 2.3 suggests that, as a result of the Local Plan, the Oxford Meadows SAC could see an increase of 10,573 - 14,098 visits, representing a 2.5 - 3.3% increase over current numbers. The survey was taken in the only two car parks of the six access points to the SAC, potentially skewing the numbers too high[10]. If visits by residents of Northern Gateway are added, 'in combination', then the increase would be a maximum of 4.5%.

[10] There are 6 access points to Oxford Meadows, shown at Figure 2.1: A Wolvercote car park; B car park off Walton Well Road, C Godstow Road, D right of way at the entrance to Wolvercote off Godstow Road, E bridge across the river from Binsey, and F bridge at Aristotle Lane. The two car parks (A and B) were used as survey

2.7 It is, however, not visitor numbers that are the potential problem, but the impact of dog fouling on the *Apium repens*. A report of 2007 estimated that dog ownership in Oxford was a maximum of 24%[11]. The survey results showed that 47% of groups visiting the SAC came with a dog, and 40% of respondents came with the main purpose of dog walking. Clearly, dog walkers are more likely to visit the SAC, and probably more likely to visit on a daily basis, than other visitors. This would rebalance the numbers above in the opposite direction.

2.8 Student accommodation does not allow pets, so this accommodation can be screened out of the assessment process. It can also be expected that at least some of the employer-linked accommodation provided by the universities would be for visiting academics coming for short periods, and who are also unlikely to have dogs: roughly 20-30% of the proposed accommodation is proposed for students or academic employer-linked housing. Additionally, most of the proposed sites are further than 500m from the SAC, reducing the likelihood of their residents regularly using the SAC; other recreational facilities will be available to most of the sites; and the Local Plan 2036 establishes some mitigation measures especially to reduce recreational impacts on the SAC. The subsequent paragraphs consider each of the sites listed in Table 2.1 with respect to these points.

2.9 **SP64 Wolvercote Paper Mill** is for about 190 dwelling units and open space, and is located about 120m north of the SAC. Access to the SAC is easy with three access points within 400m of the site. Policy SP64 notes that

> *"Proposals will be expected to create extensive new public space for the site and the local community on Plot B. This will reduce recreational pressure on the SAC… Development proposals should be accompanied by an assessment of potential recreational pressure on the SSSI that may arise from increased numbers of visitors, along with plans to mitigate this impact as necessary."*

The new public space would be usable by not only the residents of the new development but also existing dog walkers who currently use the SAC.

2.10 **SP34 Canalside Land** is for a mixed use development incorporating approximately 22 dwellings, located 510m from the SAC on an attractive and direct route along the canal. Policy SP34 notes that

> *"Development proposals should be accompanied by an assessment of potential recreational pressure on the Oxford Meadows SAC that may arise from increased numbers of dog walkers, along with plans to mitigate this impact as necessary."*

The proposed development would be small, with a preponderance of flats which are likely to discourage dog ownership.

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points. This means that the survey results will, if anything, 1. be skewed towards arrivals by car, and 2. overestimate visitor numbers, as larger numbers are likely to arrive via the car parks than via other means.

[11] BMC Veterinary Research Vol. 3 (2007) Article entitled 'Factors associated with dog ownership and contact with dogs in a UK community' www.biomedcentral.com/1746-6148/3/5.

2.11 **SP55 Radcliffe Observatory Quarter Site, SP32 Banbury Road University Sites, and SP59 Summertown House** are all located between 500m and 850m from the SAC, and are proposed for a combination of academic institutional, student accommodation and employer-linked housing. Together, they are likely to lead to roughly 158 new dwellings. However students and academic employer-linked housing is unlikely to generate any significant amount of dog-walking activity. Policy SP55 also notes that

> *"Development should be designed to ensure that there is no adverse impact on the Oxford Meadows SAC. Proposals should be accompanied by an assessment of potential recreational pressure on the Oxford Meadows SAC that may arise from increased numbers of dog walkers, along with plans to mitigate this impact as necessary."*

2.12 **SP61 University of Oxford Science Area and Keble Road Triangle** is for a large site that would be primarily academic institutional and research. The site may include a small number of dwellings – the plan assumes 10 – but these would be for students or academics, and are unlikely to generate any dog walking activity. The site also adjoins University Park, which is much more likely to attract recreational activity from this site than Oxford Meadows SAC.

2.13 **SP63 West Wellington Square** is proposed for academic institutional, student accommodation and employer-linked housing: the plan assumes 28 dwellings for the site. Again, the housing would be for students and academics, and so would generate limited, if any, dog walking activity. University Park is also more accessible to West Wellington Square than is Oxford Meadows SAC.

2.14 **SP53 OUP Sports Ground, SP29 Pear Tree Farm and SP25 St Frideswide Farm** are all more than 1km from the SAC to the north-east. Together they would provide roughly 350 dwellings. All three sites are expected to provide at least 10% of their land as new public open space, which would be usable by not only the residents of the new development but also dog walkers who currently use the SAC. For SP25 and SP53, Cutteslowe Park provides a much more accessible larger recreational area than does the Oxford Meadows SAC: Cutteslowe Park can be accessed by quiet side-roads, whereas accessing the SAC would entail crossing the very busy Wolvercote roundabout. SP29 is currently surrounded by A roads and the railway line. Residents of SP29 would exercise their dogs on the 10% of the site that is public open space, or would drive to Cutteslowe Park or the SAC: they are the only residents in this cluster of sites who are likely to regularly use the SAC to exercise their dogs.

2.15 **SP49 Old Power Station** would at most provide a few dwellings, and dog walkers are much more likely to head south along Mill Stream than to the SAC.

2.16 **SP7 276 Banbury Road, SP6 Diamond Place and Ewert House and SP5 Summerfields School athletics site** are clustered 1,200-1,250m east of the SAC as the crow flies. Together they would provide roughly 285 dwellings. They would not be expected to provide any new open space, and they would not be primarily for students or employment-linked. However they are nearly 2km from the SAC by

foot (via the Aristotle Road bridge) or 3km by car (Walton Well Road car park), including the need to cross the often-busy Banbury and Woodstock roads. Sunnymead Recration Ground to the north and the footpath along the River Cherwell to the west are more likely to attract dog walkers from these sites than the SAC.

2.17 **SP2 Osney Mead** would provide about 280 dwellings – a mixture of student accommodation, employer-linked accommodation and market housing – about 1,240m south of the SAC. The student housing is unlikely to generate dog walking visits, but the other accommodation might. However Osney Mead is adjacent to an extensive set of publicly-accessible fields heading towards South Hinksey, and access to those fields will be further enhanced as part of the Oxford flood alleviation scheme. Access to the SAC is possible via a 2km drive up Binsey Lane and then an 800m walk via the Rainbow Bridge, but residents are unlikely to do this on a regular basis.

2.18 **SP50 Oriel College land** would provide only about 7 dwellings, for students, with Christ Church Meadow very close by and an obvious place for dog walking.

2.19 **Policy H13 Homes for boat dwellers** would grant planning permission for new residential moorings on Oxford's waterways where these fulfil certain criteria. One of these is that the biodiversity of nearby nature conservation sites will be maintained or enhanced. Oxford Meadows SAC lies close to the Oxford Canal, and there is the potential that dog owners could acquire some of the new residential moorings. However, the number of new moorings is likely to be very limited; and the owners are more likely to exercise their dogs along the canal than at the SAC.

2.20 In summary, the nearest proposed development sites would provide new publicly accessible open space that would provide new dog walking areas for existing as well as new residents, and which could thus draw some existing dog walkers away from the SAC. Development sites further away are either primarily for students and academic employment-linked dwellings, or are in areas where dog walkers are better served by other, nearer parks. The new residents most likely to use the SAC for dog walking in any numbers are from SP64 Wolvercote Paper Mill because of the nearness of the SAC, and SP29 Pear Tree Farm because of the dearth of other options available.

In combination effects

2.21 The HRA for the Northern Gateway Area Action Plan calculated that an additional 1.36% of new visits would be made to the SAC as a result of the proposed 500 new homes in the AAP. The AAP also requires that 15% of that site should be green public open space, which is likely to further reduce the number of visits.

2.22 There is no indication that current visitor numbers have a detrimental effect on the condition of *Apium repens* at Oxford Meadows SAC. Indeed, the JNCC listing for

the SAC[12] shows the *Apium repens* to have excellent population, conservation status, and global grade. As such, **recreational (dog fouling) impacts on the SAC will be minimal, and will not affect the integrity of the SAC**.

3. Balanced hydrological regime

3.1 "Three main sources of water to the meads have been identified to support the plant communities on the Oxford Meadows SAC. These are direct rainfall, surface water, and groundwater flowing in from outside the area. Any of these sources, or a combination, may contribute to the soil water, which supports the plant communities on the meads" [13].

3.2 The HRAs for the previous Development Plan Documents in Oxford ruled out the likelihood of impacts on the SAC from surface water and direct rainfall. The HRA for the Core Strategy explained that the abstraction licence for Farmoor Reservoir at present does not impact on the SAC, and no increases to this abstraction licence are proposed. As such the amount of surface water is likely to remain the same throughout the Local Plan period.

3.3 The HRA Screening Report for the Draft Drought Plan (2016)[14] for Thames Water confirms that no likely significant effects are anticipated from the construction or operation of the Farmoor drought option on the Oxford Meadows SAC, either alone, or in combination with other licences and consents.

3.4 Figure 3.1 shows the location of the North Oxford Gravel Terrace in relation to the Oxford Meadows SAC. It should be read in conjunction with Figure 3.2 to provide the locational context of the direction of groundwater movement on the North Oxford Gravel Terrace.

3.5 Figure 3.2, taken from the Core Strategy HRA, shows the geology of Oxford, including the Oxford Meadows SAC. It also shows a conceptual model of groundwater flow for Oxford including the area surrounding the Oxford Meadows SAC. The model in Figure 3.2 shows that groundwater flows from the city centre away from the SAC. This means that proposed development at sites in this area will not affect the hydrology of the SAC since the direction of travel of the groundwater is away from the SAC.

[12] http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012845.pdf
[13] A. Dixon (2005) The Hydrology of Oxford Meadows
[14] Available at: https://corporate.thameswater.co.uk/About-us/Our-strategies-and-plans/Our-drought-plan/Drought-plan-update-2017

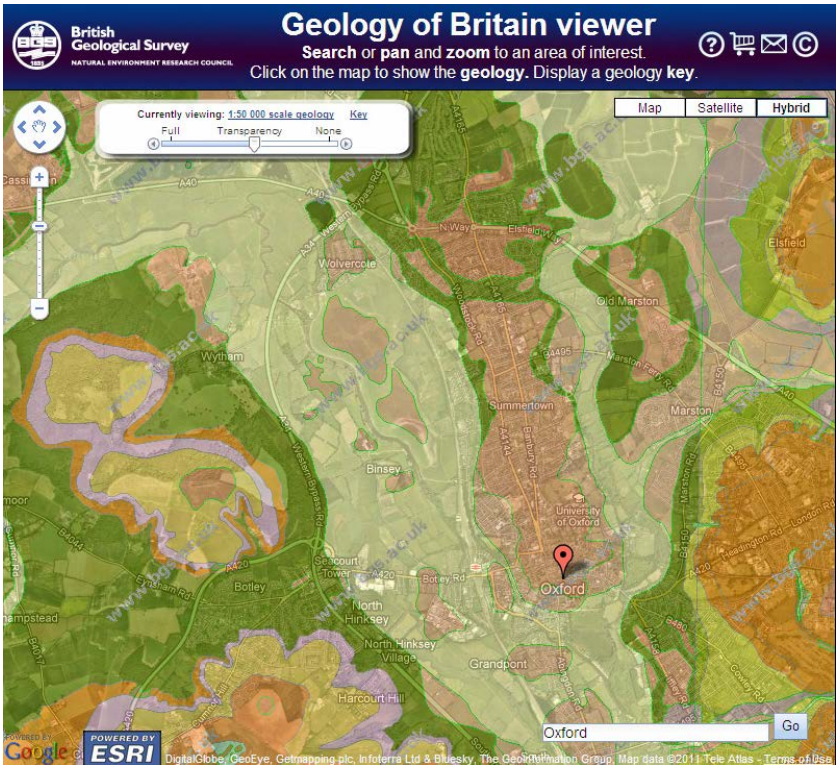


Figure 3.1 North Oxford Gravel Terrace and Port Meadow within the context of Oxford.
(Reproduced with the permission of the British Geological Survey © NERC. All rights Reserved')

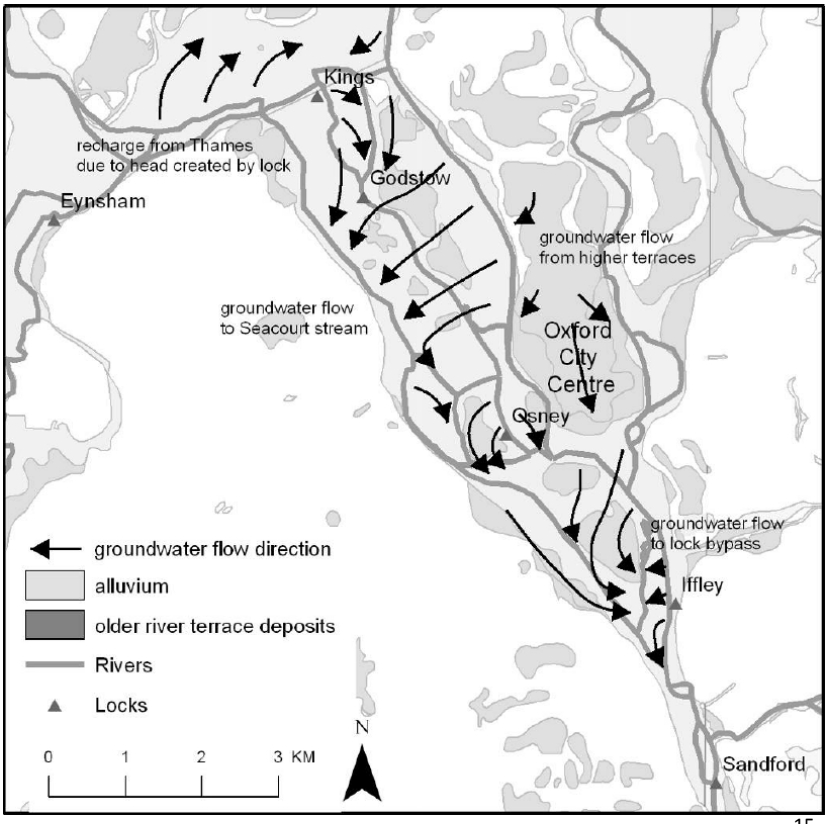


Figure 3.2 - Conceptual groundwater flow model for Oxford[15]

[15] D MacDonald *et al*. (2007) Investigating the Interdependencies between surface and groundwater in the Oxford area to help predict to timing and location of groundwater flooding and to optimise flood mitigation measures. Presented at the 42nd Flood and Coastal Management Conference, York, 2007.

3.6 As an additional protection, Policy RE4 of the Oxford Local Plan 2036 states (the most important section is highlighted in blue):

> **Policy RE4: Sustainable urban drainage, surface and groundwater Flow**
>
> … Surface and groundwater flow and groundwater recharge:
>
> Planning permission will not be granted or development that would have an adverse impact on groundwater flow. The City Council will, where necessary, require effective preventative measures to be taken to ensure that the flow of groundwater will not be obstructed.
>
> Within the surface and groundwater catchment area for the Lye Valley SSSI development will only be permitted if it includes SuDS and where an assessment can demonstrate that there will be no adverse impact on the surface and groundwater flow to the Lye Valley SSSI.
>
> **Development on the North Oxford gravel terrace that could influence groundwater flow to the Oxford Meadows Special Area of Conservation (SAC) will only be permitted if it includes SuDS and if a hydrological survey can demonstrate that there will be no significant adverse impact upon the integrity of the SAC.**

Policy RE3 on flood risk management also aims to minimise new development in the flood zone, helping to maintain water levels at the SAC.

3.7 The three development sites that are closest to the SAC – see Figure 2.1 and Table 2.1 – also have specific requirements regarding hydrology and water quality. Policy SP64 Wolvercote Paper Mill includes a requirement that:

> *"The City Council's Appropriate Assessment has shown that development on this site must incorporate sustainable drainage to avoid an impact on groundwater flows to the SAC. A hydrological survey must accompany a planning application to show that the development has been designed to avoid adverse impacts on groundwater flows."*

3.8 Policy SP34 Canalside Land includes a requirement that:

> *"A planning application must be accompanied by a site-specific assessments for flood risks, groundwater and surface water impacts. Proposals must also incorporate any necessary mitigation measures."*

3.9 Policy SP55 Radcliffe Observatory Quarter includes a requirement that:

> *"Applicants will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users."*

In combination effects

3.10 The Habitat Regulations Assessment for the Northern Gateway AAP[16] (see Figure 2.1) was based on a full hydrological statement. The statement noted that an area along the southernmost portion of the AAP land is likely to contribute to the groundwater regime affecting the SAC.

> "*However, the recharge area of the Alluvial Ribbon on the site compared to groundwater catchment of the river valley is miniscule and the overall contribution of the Alluvial Ribbon to the groundwater regime of the river valley as a whole is considered to be insignificant*."

The HRA concluded that the Northern Gateway AAP would have no impact on the SAC.

3.11 The Environment Agency's flood alleviation scheme for Oxford, which will create a flood relief channel downstream of the SAC, may affect the flooding regime of the River Thames. Figure 3.3 shows the scheme in relation to the SAC. However, the scheme is downstream of the SAC, and Natural England has stipulated that a key requirement of the Oxford flood alleviation scheme is that it does not have an adverse impact on the Oxford Meadows hydrological regime. As such, 'in combination' with the Oxford Local Plan, **there will not be an impact on the hydrology of the Oxford Meadows SAC**.



Figure 3.3 Oxford flood alleviation scheme in relation to the Oxford Meadows SAC ('Port Meadow')

[16] https://www.oxford.gov.uk/download/downloads/id/1443/northern_gateway_aap_habitat_regulations_assessment.pdf.

4. Water quality

4.1. Thames Water Utilities Limited provides water and wastewater services to the 'Swindon and Oxfordshire' (SWOX) area – see Figure 4.1. No water quality figures for Oxford exist. However the ecological status of rivers in the Thames River Basin as a whole in 2016 was:

Good or better 6%
Moderate 66%
Poor 25%
Bad 5%
Fail 2%

By 2027, this is expected to have improved significantly, with most of the surface water bodies in the catchment being of good or better ecological status[17].

4.2. Thames Water has produced a catchment management plan[18] which discusses how the sewage network in the Oxford catchment will be improved so that it can cope with current and future demands. In the short term, this will involve implementing solutions at critical locations across the catchment. In the medium term, this will include the refurbishment of the local sewerage network to reduce pollution and foul sewer flooding.

4.3. In July 2018, consultants Wallingford HydroSolutions completed a Water Cycle Study[19] for Oxford City Council to support the Oxford Local Plan 2036. The study aimed to identify in a holistic sense, and if possible to quantify, the capacity of all water-related infrastructure and the wider environment within the city to support new housing and commercial developments. The study covered:

- Environmentally, economically and licenced availability of water resources for abstraction and use
- Flood risk arising from further development
- Sewerage treatment and disposal (subdivided into environmental and infrastructural capacity
- Other environmental considerations and constraints to development.

4.4. The Water Cycle Study assessed two scenarios for growth in Oxford: a lower growth scenario of 8,000 dwellings and a higher growth scenario of 12,000 dwellings throughout the plan period. It also assessed the impacts of 37 specific housing sites.

4.5. The study concluded that the 2014 upgrading of the sludge stream at the Oxford sewage treatment works (STW)[20] provides the additional sludge treatment capacity required for the growth in population envisaged by the Local Plan 2036. However it

[17] https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6/Summary.
[18] https://www.thameswater.co.uk/-/media/Site-Content/Thames-Water/Corporate/AboutUs/Investing-in-our-network/Sewerage-catchment-studies/2018-catchment-plans/Oxford-catchment-plan.pdf
[19] Wallingford HydroSolutions Limited (2018) Phase 1 Oxford City Water Cycle Scoping Study.
[20] The STW is located downstream of the SAC, at Littlemore

also noted that the storm overflow component of the STW is close to capacity, and that, in addition to action by Thames Water, the Local Plan should promote the use of Sustainable Drainage Systems (SuDS) to ensure that development does not affect or has minimal impact on water quality or flow regimes.

4.6. Policy RE4 of the Oxford Local Plan 2036 states:

> **Policy RE4: Sustainable urban drainage, surface and groundwater flow**
>
> All development proposals will be required to manage surface water through Sustainable Drainage Systems (SuDS) or techniques to limit run-off and reduce the existing rate of run-off on previously developed sites[21]. Surface water runoff should be managed as close to its source as possible, in line with the following drainage hierarchy:
>
> a) store rainwater for later use; then:
> b) discharge into the ground (infiltration); then:
> c) discharge to a surface water body; then:
> d) discharge to a surface water sewer, highway drain or other drainage system; and finally:
> e) discharge to a combined sewer.
>
> Details of the SuDS shall be submitted as part of a drainage strategy or FRA where required. Applicants must demonstrate compliance with the SuDS Design and Evaluation Guide SPD/ TAN for minor applications and Oxfordshire County Council guidance for major development…

4.7. No infrastructure concerns are envisaged in terms of waste water for the majority of sites, and the existing network has sufficient capacity to support the new developments. However, of the 37 housing sites that were considered in the July 2018 water cycle study, eight are of a scale that is likely to require upgrades to the wastewater network. Of these eight, five are still in the Local Plan: SP4 Blackbird Leys central area, SP23 Warneford Hospital, SP44 Lincoln College Sports Ground, SP45 Littlemore Park, and SP53 Oxford University Press Sports Ground.

4.8. In August 2018, Hydrosolutions were asked to consider the other sites that are coming forward in the Local Plan. The consultants plotted the new sites relative to those which had previously been assessed, based on their professional judgement. Figures 4.1 and 4.2 show both the originally assessed sites and the additional housing sites, using a traffic light (red, amber, green) approach. Although Thames Water's assessment suggests that most areas of Oxford have capacity to accept more housing in terms of wastewater infrastructure, some areas may require upgrades.

4.9. The consultants also noted that, given that most of their original assessment was based on higher dwelling projections than are expected in practice – 12,000 rather than the 8,620 proposed in the Local Plan – "the newer sites would only have an impact on the conclusions [of the original study] if they result in dwelling numbers far in excess of 12000".

[21] Oxford City Council – reference to follow once published on website

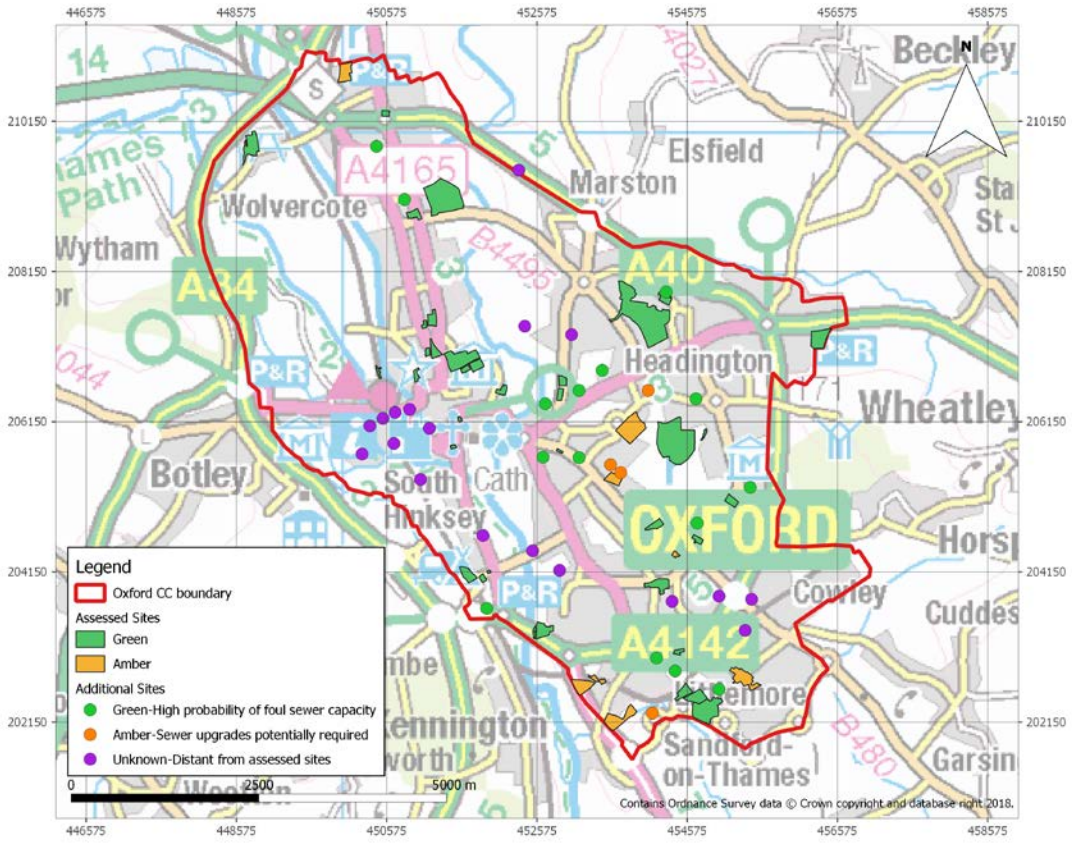


Figure 4.1 Implications of sites in Oxford on the Foul Water Network

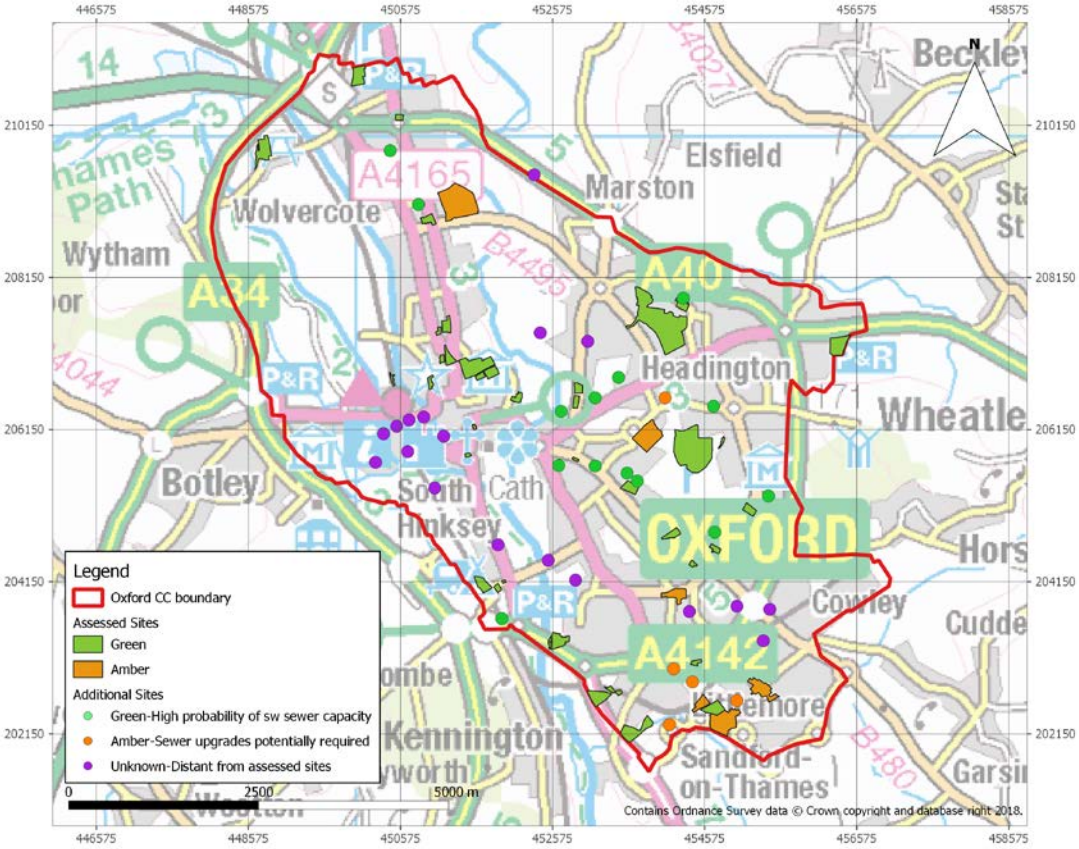


Figure 4.2 Implications of sites in Oxford on the Surface Water Network

4.10. The consultants do note that "this isn't 100% accurate and for some areas such as Botley we don't have enough information to make even a rough assessment", accounting for the purple dots on the west side of Figure 4.1. However, Figure 4.1 clearly shows that those proposed development sites that are upstream of the Oxford Meadow SAC, and that could potentially affect water quality at the SAC through foul water, are – with the exception of SP29 Pear Tree Farm – unproblematic with respect to foul water that could affect the SAC. Policy SP29 includes a requirement that the developer will gain agreement with Thames Water about foul water before development is permitted.

4.11. The only site upstream of the Oxford Meadows SAC that could potentially affect water quality at the SAC through surface water is SP5 Summer Fields School playing field. However that site is more than 1km from the SPA, and any surface water is likely to go to the River Cherwell, which discharges into the River Thames downstream of the SAC. The three sites that are closes to the SAC

4.12. Together, the water cycle study and subsequent analysis by Hydrosolutions confirms that **the Oxford Local Plan 2036 will not affect the integrity of the Oxford Meadows SAC in terms of water quality**.

In combination effects

4.13. The other Oxfordshire authorities' water cycle studies – listed at Table 4.1 - conclude that there are some constraints for development planned to 2030 in terms of wastewater treatment works (WWTW). For instance in Cherwell District Council seven of the 12 WWTWs do not have sufficient flow capacity or treatment processes to accept all future development proposed to 2030 without upgrades; in South Oxfordshire there are concerns about 15 of the 16 WWTWs; in Vale of White Horse 10 of the 13 works are insufficient for the works proposed to 2030; and in West Oxfordshire the Cassington WWTW is insufficient.

4.14. However these constraints are being taken into account by the local authorities, in discussions with Thames Water, and are not expected to act 'in combination' with the Oxford Local Plan 2036.

Table 4.1. Oxfordshire local authority water cycle studies

Local auth	Date of WCS	Website for WCS
Cherwell	Nov 2017	https://www.cherwell.gov.uk/download/downloads/id/4802/pr81-cherwell-water-cycle-study---november-2017.pdf
South Oxfordshire	Nov 2014	http://www.southoxon.gov.uk/sites/default/files/Water%20Cycle%20Study%20Phase%20I%20-%20S%20Oxfordshire%20District%20Council.pdf.
Vale of White Horse	March – Sep 2017	http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=923019311&CODE=923CCD62AAE90D5E9096D81C78BCF194 + addendum http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=923019312&CODE=923CCD62AAE90D5EF95E0A4D92A16B54 + update http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=923019312&CODE=923CCD62AAE90D5EF95E0A4D92A16B54
West Oxfordshire	Nov 2016	https://www.westoxon.gov.uk/media/1572197/ENV11-West-Oxfordshire-Water-Cycle-Study-Phase-1-Scoping-Study-November-2016-.pdf.

5. Air quality

Introduction

5.1. The Oxford Meadows SAC is susceptible to poor air quality, notably NO_x from the A34 and A40. Air pollution from vehicles drops off rapidly with distance from a road, and Natural England guidance suggests that it does not need to be assessed beyond 200m from the road[22]. A small portion of the A34 between Botley Interchange and Peartree Interchange bisects the Oxford Meadows SAC, and a small portion of the A40 between Oxford and Eynsham acts as the northern boundary to the hay meadows – see Figure 5.1. Those parts of the SAC that are further than 200m from the roads, including all of the southern part of the SAC, are not at risk.

5.2. The Air Pollution Information Service[23] (APIS) provides a searchable database and information on pollutants and their impacts on habitats and species. This database recognises that the Oxford Meadows SAC is sensitive to Nitrogen Deposition (N dep). APIS provides information relating to what is known as Critical Loads. Critical loads and levels are a tool for assessing the risk of air pollution impacts to ecosystems. The critical load for N dep at the Oxford Meadows is 20-30 kg N/ha/yr.

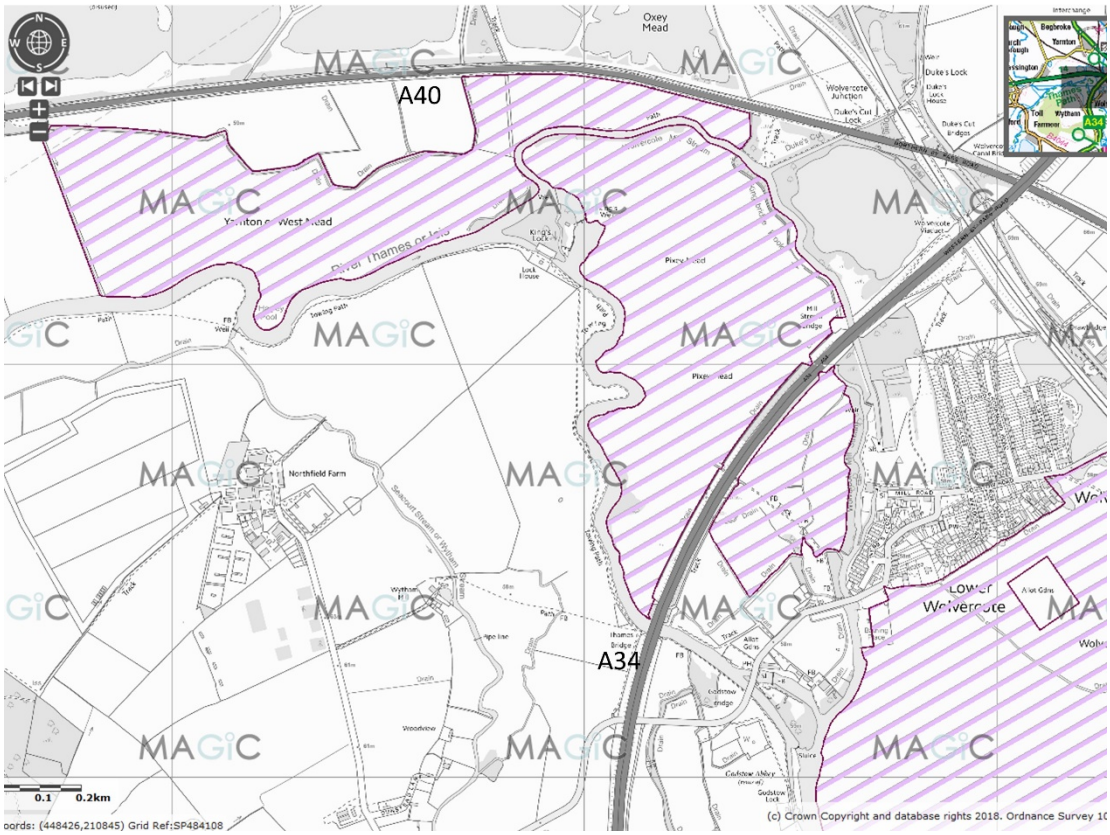


Figure 5.1 The A34 and A40 at the Oxford Meadows SAC

[22] Natural England (2018) *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.*

[23] http://www.apis.ac.uk/

5.3. NO_2 levels are reducing nationally as a result of tightening vehicle emission standards and other measures[24], and are expected to keep reducing. Natural England published a guidance note in June 2018 entitled "Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitat Regulations (NEA001)"[25]. This guidance sets a threshold for requiring appropriate assessment for a plan, instead of just being able to screen it out from further HRA work. The threshold is set at 1,000 annual average daily traffic (AADT), or greater than 1% of the critical load/level for the European site.

5.4. Natural England's guidance note also states, at p.10:

> *"Staff should be aware that, in accordance with Government's guidance on competent authority co-ordination when applying the Habitats Regulations, it is generally permissible for a competent authority to adopt, if it can, the assessment, reasoning and conclusions of another competent authority relating to the same plan or project, thus avoiding unnecessary duplication of effort. Staff, are therefore encouraged to advise competent authorities to first check, at an early stage, the extent to which this might apply in relation to assessing road traffic emissions from an individual proposal. For example, the likely effects of a development proposal might have already been considered by a HRA of a Local Plan made by the same or another competent authority."*

Previous HRA work

5.5. The Oxford Local Plan 2036 is one of several plans in Oxfordshire that propose development in locations that have the potential to increase vehicular traffic on the A34 and A40, and therefore air pollution that could affect the integrity of the SAC. Table 5.1 lists the HRAs carried out for these plans.

5.6. As part of the preparation of the most recent of these plans, Cherwell's Local Plan, Atkins produced a Memo[26] in August 2018. The Memo combines work undertaken by the Vale of White Horse (VoWH) and Cherwell district councils, and considers the likely 'in-combination' effects of traffic growth from all the Oxfordshire authorities on the Oxford Meadows SAC. The Memo uses a set of previously-agreed growth assumptions for all the Oxfordshire councils: for Oxford, it assumes that 6,695 dwellings will come forward in the period 2011-2031. Based on these assumptions, it generated traffic flow estimates using Oxfordshire County Council's Strategic Traffic Model. Based on the traffic flow estimates and dispersion modelling undertaken to support Cherwell District Council's Local Plan Part 1 Partial Review, it predicts the likely changes in both Oxides of Nitrogen (NO_x) and Nitrogen deposition (N dep) on the Oxford Meadows SAC. These outputs were then used to examine the forecast change in NO_x concentrations associated with a certain change in traffic flow. It is thus possible to determine how much additional traffic would need to be

[24] DEFRA (September 2017) *Air Pollution in the UK 2016*.
[25] http://publications.naturalengland.org.uk/publication/4720542048845824
[26] Appendix D, Memo from Atkins to Natural England regarding air quality effects at Oxford Meadows SAC from growth at Cherwell and Vale of White Horse in combination, as part of the HRA Stage 1 Screening Report and Stage 2 Appropriate Assessment, August 2018. https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/4

added to the A40 and A34 through the Oxford Meadows SAC to result in a change of N dep of more than 1% of the critical load.

Table 5.1 HRAs carried out for other Oxfordshire plans		
Plan	Date of HRA	Website for HRA
Cherwell Local Plan	August 2018	https://www.cherwell.gov.uk/download/downloads/id/8163/hra-stage-1-screening-report-and-stage-2-appropriate-assessment---august-2018.pdf HRA explanatory note https://www.cherwell.gov.uk/download/downloads/id/8180/revised-hra-august-2018--explanatory-note.pdf
South Oxfordshire Local Plan	Jan. 2018	http://www.southoxon.gov.uk/sites/default/files/South%20Oxfordshire%20HRA%20Report%20FINAL_0.pdf
Vale of White Horse Local Plan	June 2018	http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=923019048&CODE=170238546D230566000A999C130C7570
West Oxfordshire Local Plan	June 2018	https://www.westoxon.gov.uk/media/1867474/West-Oxfordshire-Local-Plan-2018-HRA-June-2018.pdf
Oxfordshire LTP4	June 2015	https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/localtransportplan/ltp4/AppendixDHRAScreeningReport.pdf
Oxfordshire minerals and waste plan	Aug. 2015	https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/environmentandplanning/planning/mineralsandwaste/mw2016/5SupportingDocs/5.1-5.2/5.1_HRA_M%26W_CoreStrategy_ScreeningReport_August2015.pdf
Oxfordshire Growth Board	Dec. 2017	Not publicly available

5.7. In considering the impact of additional vehicle movements associated with planned housing growth, the Memo states that:

> *"The additional traffic resulting from 4,400 additional housing units detailed in Cherwell's [Local Plan Part 1 Partial Review] is shown in Table 4 to be 1,129 AADT on the A40 and 1,008 AADT on the A34. The additional traffic associated with VoWH additional 3,420 housing units would therefore need to exceed 9,000 AADT [annual average daily traffic] on the A40 and 10,000 AADT on the A34 to result in an increase of N dep rate of 1%, which might require further assessment to identify any potential adverse effect on site integrity.*
>
> *On the above basis, the changes in traffic in Cherwell and Vale of White Horse with proposed Local Plan development are unlikely to result in increases of N deposition of 1% or more."*

5.8. Appendix E of Cherwell District Council's HRA Report includes a response from Natural England:

> *"Thank you for providing the in-combination assessment of NOx levels… Having reviewed the data… we are satisfied with the conclusion that the changes in NOx levels arising from Vale and Cherwell Local Plans will not have an adverse effect on the integrity of Oxford Meadows SAC."*

5.9. The HRA for the Cherwell Local Plan uses the same figures as the Memo. The Memo and Cherwell's HRA can thus be used as a basis – and a baseline - agreed by Natural England, for assessing the 'in combination' air pollution impacts caused by the Oxford Local Plan 2036.

Car-free developments as HRA avoidance measure

5.10. Policy H1 of the Oxford Local Plan 2036 allocates 8,620 homes, i.e. 1,925 homes more than the assumptions in the Cherwell HRA which concludes that there will be no signification 'in combination' impact on the SAC. Due to a range of factors outside of the scope of planning, there is an expectation that additional growth from 2031 to 2036 will anyway be unlikely to result in significant air quality impacts at the Oxford Meadows SAC: this is because any growth at the end of the plan period will benefit from external factors, including an increase in electric vehicles and the diesel scrappage scheme. The Oxford Local Plan 2036 also encourages the take-up and use of electric vehicles by providing appropriate charging infrastructure.

5.11. The Oxford Local Plan 2036 is, by its nature, unlikely to generate the per capita traffic movements that would be generated by more rural authorities with a different economic profile. University of Oxford academic developments have historically generated very little additional traffic and this approach is likely to continue. The plan directs retail to the district and city centres which have very good non-car accessibility. Employment sites such as the Business and Science Parks are on the other side of the city and are unlikely to attract much additional traffic along the A34; in the longer run, it is hoped that they will be served by the Cowley (rail) Line. Furthermore, the plan requires several employment sites to reduce their parking, for instance:

Policy SP9: Oxford BMW Mini Plant
A reduction in car parking provision on site will be required and opportunities sought to enhance and promote more sustainable travel modes to the BMW Oxford Mini Plant.

Policy SP10: Oxford Science Park (Littlemore & Minchery Farm)
A reduction in car parking provision on site will be required and opportunities sought to enhance and promote more sustainable travel to and from the park.

Policy SP11: Oxford Business Park
A reduction in car parking provision on site will be required and opportunities sought to enhance and promote more sustainable travel modes to the business park.

5.12. By providing for 8,620 dwellings without a commensurate increase in employment land, the plan also helps to reduce commuting: at present, more than 40% of the city's workforce lives outside Oxford, contributing to pollution on the A34 and A40.

5.13. The main measure in the Local Plan which avoids an increase in AADT/ NOx/ N deposition at the Oxford Meadows SAC is the active promotion of car-free housing, providing certain criteria are met. Car-free housing typically provides no parking or only very limited parking on site: disabled parking and some parking for delivery vehicles. Car-free developments are typically supported/ surrounded by Controlled Parking Zones (CPZ), and the residents of the car-free development are typically precluded from obtaining a parking permit, for instance through a contract. The three main categories of car-free development promoted by the plan are:

a. Student accommodation
b. Employer-linked accommodation
c. Housing in very accessible areas with controlled parking zones.

5.14. For ***student accommodation***, the assumption is that students will not need cars for work, and their housing will be provided in areas that are easily accessible by walking, cycling and public transport. Policy H8 relates to student accommodation:

Policy H8: Provision of new student accommodation

Planning permission will only be granted for student accommodation in the following locations:

- on or adjacent to an existing university or college campus or academic site, or hospital and research site, and only if the use during university terms or semesters is to accommodate students being taught or conducting research at that site; or
- In the city centre or a district centre; or
- On a site which is allocated in the development plan to potentially include student accommodation.

…Planning permission will only be granted for student accommodation if:

e) the development complies with parking standards that allow only operational and disabled parking, and the developer undertakes to prevent residents from parking their cars anywhere on the site, and anywhere in Oxford (unless a disabled vehicle is required), which the developer shall monitor and enforce; …

5.15. For ***employer-linked housing***, the assumption is that residents will live and work within walking distance, so minimising the need to drive. The employment sites are also expected to provide the same amount of employment-generating development in addition to the housing development, which means that there will be less room for parking. For ***housing in very accessible areas***, the assumption is that residents will be able to walk, cycle or take public transport rather than needing a car. Car clubs are also encouraged, to deal with the residents' need for specific car-based trips. Policy M3 deals with these cases:

Policy M3: Motor vehicle parking

In Controlled Parking Zones (CPZs) or employer-linked housing areas (where occupants do not have an operational need for a car) where development is located within a 400m walk to frequent (15minute) public transport services and within 800m walk to a local supermarket or equivalent facilities (measured from the mid-point of the proposed development) planning permission will only be granted for residential development* that is car-free….

Planning permission for additional parking provision within new developments will only be granted for spaces that are designated for disabled people, car clubs or where it can be demonstrated that there are essential operational or servicing needs (identified in the supporting TA and TP).

5.16. Some of the site-specific policies also specify that there will be a reduction in car parking, for instance:

Policy SP2: Osney Mead

New high-quality public open space should be created on the site with a reduction in car parking spaces.

Policy SP55: Radcliffe Observatory Quarter
A reduction in car parking provision on site will be required. Pedestrian and cycle links through and to the site, including to the University Science Area, should be maintained and enhanced.

Policy SP56: Ruskin College Campus
A reduction in car parking provision on site will be required and pedestrian and cycle links through and to the site should be enhanced.

Controlled Parking Zones in Oxford City

5.17. Car-free developments are unlikely to work effectively unless they are in a Controlled Parking Zone (CPZ) which restricts parking places to residents who have permits. Residents of car-free housing would not be allowed to get a permit.

5.18. Oxford already has an existing suit of CPZs, shown at Figure 5.2. However the roll-out of CPZs is not solely in Oxford City Council's control. As such, it cannot ensure full coverage of the city with CPZs, which is what would be needed to fully support its car-free plan policies.

5.19. However Oxford City Council is actively working in partnership with Oxfordshire County Council to expand the coverage of CPZs. Funding was announced in June 2018 to bring forward new CPZs. The County Council is providing £661,000: £250,000 from its own capital programme and £411,000 from held or secured planning (S106) or highways (S278) agreements linked to new developments. Additionally the City Council has secured £200,000 from Community Infrastructure Levy Funds to contribute to this programme. Table 5.2 shows the timetable for implementation of new CPZs across Oxford.

5.20. The Oxford Local Plan 2036 notes, in the supporting text to Policy M3:

Supporting text to Policy M3: Motor vehicle parking

The City and County Councils are actively working towards covering the whole city with Controlled Parking Zones by 2036, if not earlier. The reduction of parking and car use within and around the city is essential if air quality is to be improved. In addition, to ensure that the fullest protection of the integrity of the Oxford Meadows SAC and to comply with the requirements of the Habitats Regulations Assessment, new residential development sites will need to be car-fee as set out in M3 and Appendix 7.3.

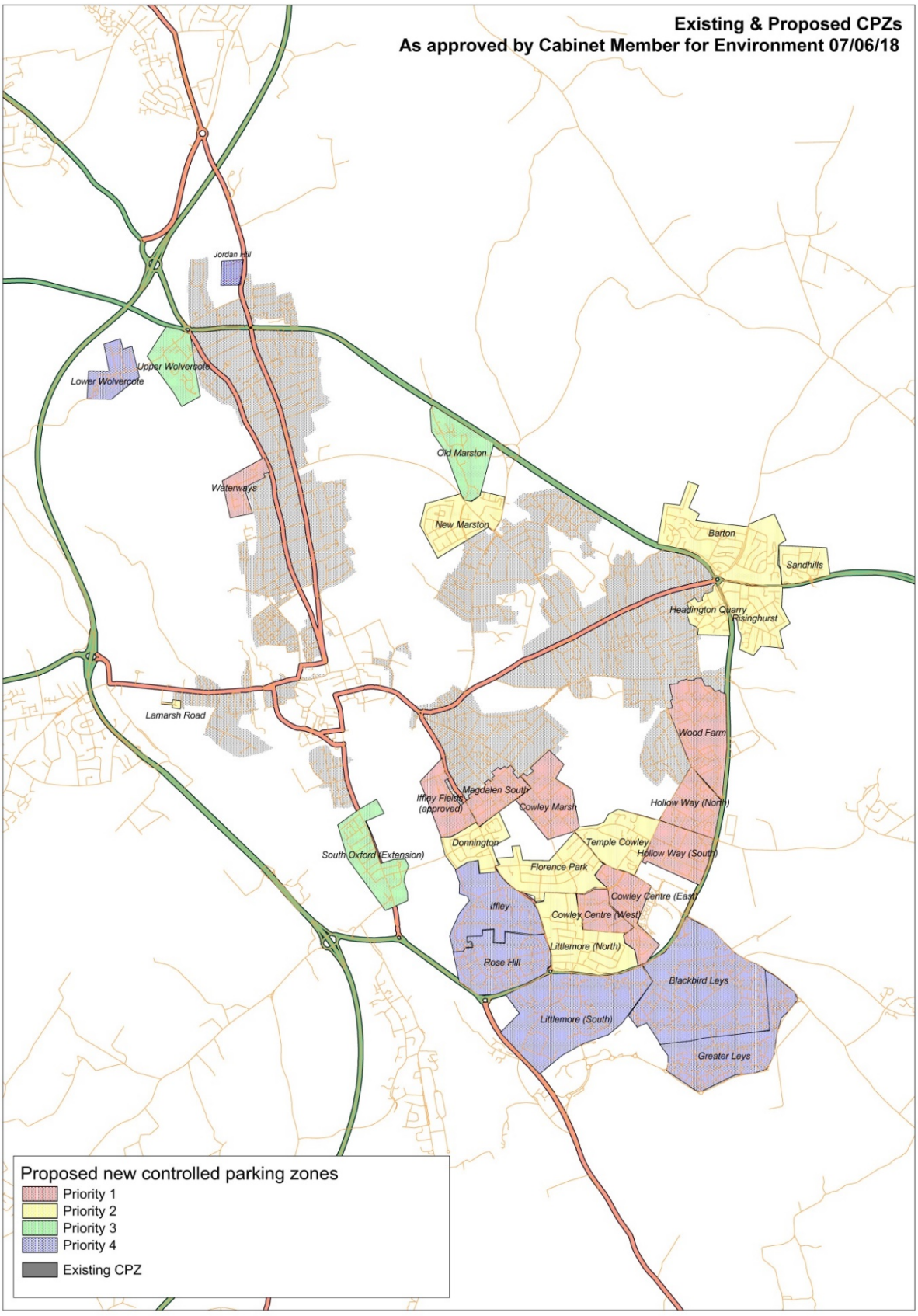


Figure 5.2 Proposed new controlled parking zones in Oxford

Table 5.2 Timetable for new controlled parking zones in Oxford	
Zone	Timetable
Iffley Fields	• Construction – September 2018 • Start of Operation – October 2018
Wood Farm	• Consultation – Autumn 2018 • Construction – Winter 2019 • Start of Operation (if approved) – Winter 2019
Madgalen South	• Consultation – Autumn 2019 • Construction – Winter 2019 • Start of Operation (if approved) – Spring 2019
Other "Priority 1 & 2 Zones' (coloured red and yellow on CPZ map – see above)	• Parking surveys – Autumn 2018 • First consultation – Autumn 2018 • Second consultation – Spring 2019 • Construction (staggered) – Autumn 2019-Spring 2020 • Start of operation (if approved) (staggered) Autumn 2019-Spring 2020
Other "Priority 3 & 4 Zones (coloured green and blue on CPZ map – see above)	• No dates or funding confirmed yet

5.21. Figure 5.2 shows that at present, about half of the city's roads[27] are covered by CPZs. With the additional funded areas included (to 2020) this is likely to rise to about 75%. Policy M3 relies on CPZs being fully operational: clearly as more are CPZs are implemented, there will be more scope for an increasing amount of car-free development in the city.

Number of car-free dwellings, and their transport impacts

5.22. The housing that will come forward under the Local Plan comprises

- housing proposed in the site-specific policies;
- other sites emerging from the Strategic Housing Market Assessment (SHMA) and Housing and Economic Land Availability Assessment (HELAA) process;
- windfall sites; and
- sites that were already being built out in 2016-2018.

5.23. For ***housing proposed under the site-specific policies*** of Chapter 9 of the Local Plan, **Appendix C** shows that are expected to generate, in the most likely case, about 1,437 car-free dwellings.

5.24. ***Other sites emerging from the SMA/HELAA process*** (e.g. student castle at Osney Lane, Elsfield Hall, Travis Perkins, Speedwell House, Blanchford's building merchants, Magdalen Road and Newtec Place, Powell's Timber Yard, Green Templeton College, Rewley Abbey Court, Northgate House, former Murco garage) are expected to generate about 430 car-free dwellings.

[27] Much of the city area is green space, including the Oxford Meadows SAC, accounting for many of the blank spaces on the map

5.25. ***Windfalls*** are expected to generate about 1020 dwellings, typically on small sites in existing residential areas well-served by nearby shops, and by walking, cycling and bus infrastructure/services. Policy M3 ensures that, if these homes are in a controlled parking zone, they will be car-free. If, conservatively, one-third of these new dwellings will be car-free, that would account for 340 car-free dwellings. If half of them are car-free, that would account for 510 car-free dwellings.

5.26. ***Sites that were already being built out in 2016-2018*** are counted under the current baseline of traffic, and so those houses are included in the baseline covered by Cherwell and do not count towards this calculation.

5.27. Based on the above, between 2,200 and 2,380 car-free dwellings ('low' and 'high' scenarios) will emerge from the plan, and will help to avoid air pollution impacts at the SAC. The remaining 6,240 – 6,420 dwellings would be standard dwellings albeit with, over time, an increasing proportion of electric cars.

5.28. The car-free dwellings will not be completely traffic-free. Traffic will be generated by visitors, tradesmen, disabled drivers, delivery vehicles and residents moving in and out. **Appendix D** shows that car-free development generates roughly 10-12.5% of the vehicular traffic that would be generated by a standard development. As such, 2,200 car-free dwellings would generate the same amount of traffic as 220-275 standard dwellings; and 2,380 car-free dwellings would generate the same amount of traffic as 238-298 standard dwellings.

5.29. Table 5.3 brings together information from the car-free dwellings and standard dwellings under the two scenarios discussed above. Together, the standard dwellings plus the car-free dwellings (totalling up to the plan's 8,620 dwellings) would generate the equivalent amount of traffic as 6,478 – 6,695 standard homes.

Table 5.3 Standard dwelling equivalent vehicle movements under low and high car-free dwelling scenarios

	No. car-free dwellings	Car-free dwelling equivalent of vehicle movements	No. standard dwellings (total 8620 – no. car-free dwellings)	Standard dwelling equivalent vehicle movements
Low car-free dwelling scenario	2,200	220 - 275	6,420	6,640 – 6,695*
High car-free dwelling scenario	2,380	238 - 298	6,240	6,478 – 6,538

5.30. The Cherwell HRA, which considered 'in combination' effects and was approved by Natural England, assumed 6,695 (standard) dwellings for Oxford. Table 5.3 shows that the Oxford Local Plan will not generate more traffic movements than 6,695

standard buildings. Oxford's approach avoids (rather than mitigates) the air pollution impacts, which is the preferred approach to HRA. It is also consistent with Natural England's guidance (para. 5.4 above) that local authorities can adopt the reasoning and conclusions of another competent authority relating to the same plan, so as to avoid duplication of effort. As such, consistent with the HRAs of the other Oxfordshire local authorities, **the Oxford Local Plan 2036 is not expected to have an impact on the integrity of the Oxford Meadows SAC with respect to air pollution.**

In combination effects

5.31. The above calculations are already based on 'in combination' effects with the Local Plans of the local authorities adjacent to Oxford City Council.

5.32. A Joint Statutory Spatial Plan (JSSP) is being developed by all the Oxfordshire authorities, which will provide a strategic policy framework for Oxfordshire to 2050. It will also take forward the Oxfordshire Housing and Growth Deal's commitment to deliver 100,000 homes by 2031. The JSSP is expected to be completed in Spring 2019, but has not yet actively begun, so it is not possible to consider this 'in combination'. The JSSP will anyway be accompanied by its own HRA, which will be based on Natural England's 2018 guidance.

5.33. In its 2017 report 'Partnering for Prosperity'[28], the National Infrastructure Commission proposed an expressway between Oxford and Cambridge. In September 2018, a preferred corridor for the expressway was published, shown at Figure 5.3. Depending on whether the ultimate route goes to the north or the south of Oxford – or both ways – this could lead to significant more vehicle movements at the SAC. This will need to be considered by the National Infrastructure Commission.

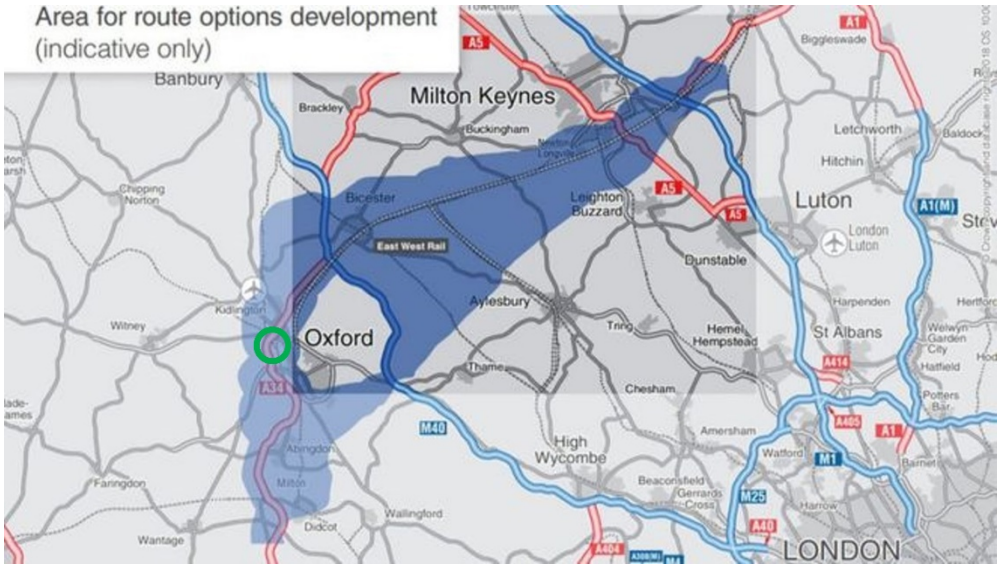


Figure 5.3 Preferred corridor of the Oxford-Cambridge expressway
Location of Oxford Meadows SAC in green

[28] National Infrastructure Commission 2017. Partnering for Prosperity: a new deal for the Cambridge – Milton Keynes – Oxford Arc.

Approach to air quality of this HRA

5.34. Clearly this is not an easy subject. During the course of the Oxford plan-making process, there have been:

- The 'Wealden judgement'[29] of March 2017 which clarified that, where several local authorities' plans may affect air quality at an SAC, their impacts need to be considered together with respect to the consideration of annual average daily traffic flows;
- A European Court of Justice ruling[30] of April 2018, 'People Over Wind', that mitigation measures cannot be taken into account at the HRA screening stage;
- Natural England's publication in July 2018 of guidance on 'in combination' air pollution impacts on SACs[31], which responds to the Wealden judgement; and
- A European Court of Justice ruling[32] of July 2018, 'Coöperatie Mobilisation for the Environment', which addresses how overall measures to manage N deposition at sites should be handled, and which distinguishes between avoidance and mitigation measures (permissible in appropriate assessment) and compensatory measures (permissible only in subsequent assessments of no alternatives etc.)

5.35. Throughout the Local Plan process, Oxford City Council's planning team have informed Natural England of their concerns and thoughts about how to deal with this issue, given the rapidly-changing policy environment and the other local authorities' emerging HRAs. **Appendix E** provides a copy of the correspondence between Oxford City Council and Natural England. Despite this, it has not yet been possible to agree this HRA with Natural England.

6. Conclusions

6.1. This HRA concludes that the Oxford Local Plan 2036 will not affect the integrity of the Oxford Meadows SAC through recreational (dog fouling) impacts, impacts on water levels or quality, or air pollution. In terms of air pollution, it proposes an innovative approach to avoiding impacts through car-free development, which could act as a model for other urban authorities.

[29] http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html

[30] http://curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=619449

[31] Natural England (2018) *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations.* http://publications.naturalengland.org.uk/file/5431868963160064.

[32] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:62017CC0293&from=EN.

Appendix A. HRA screening report

Planning Policy

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OXFORD CITY COUNCIL

Oxford Local Plan 2036

Habitats Regulations Assessment:

Screening

October 2017

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7. Introduction

7.1 This report discusses Stage 1 (screening) of the Habitat Regulations Assessment (HRA) for the Oxford Local Plan 2036.

7.2 The Oxford Local Plan Preferred Options Document

- Sets a capacity based target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims. As a result of this policy option the level of housing development proposed by the Local Plan is likely to generate a population increase of around 20,000 people.
- Continues to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford's administrative boundary
- Proposes to release 8 sites of about 18 hectares in total from the Oxford's Green Belt
- Protects key employment sites (category 1 and 2) from the loss to other non-employment uses
- allows employment sites that are not considered key to the Oxford's economy to be redeveloped eg for housing
- Continues to use the existing Area Action Plans eg West End AAP or Northern Gateway AAP as the basis for decisions on appropriate uses in those areas, rather than including detailed new site allocation policies

Requirements of the Habitats Directive

7.3 Appropriate Assessment of plans that could affect Special Conservation Areas (SACs), Special Protection Areas (SPAs), and Ramsar sites (jointly called 'European sites) is required by Article 6(3) of the European Habitats Directive[33], which states:

> *'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of this assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'*

7.4 Article 6(4) of the Habitats Directive discusses alternative solutions, the test of 'imperative reasons of overriding public interest' (IROPI) and compensatory measures:

> *'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out*

[33] Directive 92/42/EEC on the Conservation of Natural Habitats and Wild Fauna

for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natural 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

7.5 The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted if it can be shown that they will have no significant adverse effect on the integrity of any European site, or if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

7.6 The Habitats Directive was implemented into UK legislation through the Conservation (Natural Habitats, & c) Regulations 1994. The currently relevant piece of legislation is the 'Conservation of Habitats and Species Regulations 2010 (as amended) and is generally known as the Habitats Regulations.

Methodology used for this Habitat Regulations Assessment

7.7 A Habitat Regulations Assessment can involve up to a four stage process.

5. **Screening**. Determining whether or not a plan 'alone or in-combination' is likely to have a significant effect on a European site.
6. **Appropriate Assessment**. Determining whether, in view of the site's conservation objectives, the plan 'alone or in-combination' would have an adverse effect (or risk of this) on the integrity of the site. If not, the plan can proceed.
7. **Assessment of alternative solutions**. Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site, there should be an examination of alternatives.
8. **Assessment where no alternative solutions remain and where adverse impacts remain**.

7.8 This HRA covers stage 1 (screening). Oxford City Council has undertaken this HRA "in house" and it was audited by Levett-Therivel Sustainability Consultants.

8. Screening

European Sites

8.1 This section begins by describing the European sites that could possibly be affected by the Oxford Local Plan 2036. For this Habitat Regulations Assessment a 20km area of search outside of the Oxford City Council Administrative Area was used. The following European Sites are within 20km of the Oxford City Council administrative boundary.

Table 2.1 – European Sites within 20km of Oxford City boundary Oxford Local Plan 2036 Preferred Options Document

Name of site	Distance from boundary	Reason for designation[34]
Oxford Meadows SAC	Within City Boundary, extending into administrative area for Cherwell District Council and into the administrative boundary of West Oxfordshire District Council.	**Annex I habitats that are a primary reason for selection of this site** **6510 Lowland hay meadows** (Alopecurus pratensis, Sanguisorba officinalis) Together with North Meadow and Clattinger Farm, also in southern England, Oxford Meadows represents **lowland hay meadows** in the Thames Valley centre of distribution. The site includes vegetation communities that are perhaps unique in the world in reflecting the influence of long-term grazing and hay-cutting on **lowland hay meadows**. The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. **Annex II species that are a primary reason for selection of this site** 1614 **Creeping marshwort** Apium repens Oxford Meadows is selected because Port Meadow is the larger of only two known sites in the UK for **creeping marshwort *Apium repens***.
Cothill Fen SAC	Located 7km from the city boundary	**Annex I habitats that are a primary reason for selection of this site** **7230 Alkaline fens** This lowland valley mire contains one of the largest surviving examples of **alkaline fen** vegetation in central England, a region where fen vegetation is rare. The M13 *Schoenus nigricans – Juncus subnodulosus* vegetation found here occurs under a wide range of hydrological conditions, with frequent bottle sedge *Carex rostrata*, grass-of-Parnassus

[34] Source www.jncc.gov.uk

		Parnassia palustris, common butterwort *Pinguicula vulgaris* and marsh helleborine *Epipactis palustris*. The alkaline fen vegetation forms transitions to other vegetation types that are similar to M24 *Molinia caerulea – Cirsium dissectum* fen-meadow and S25 *Phragmites australis – Eupatorium cannabinum* tall-herb fen and wet alder *Alnus* spp. wood.
Little Wittenham SAC	Located 19km from the city boundary	**Annex II species that are a primary reason for selection of this site** 1166 **Great crested newt** Triturus cristatus One of the best-studied great crested newt sites in the UK, Little Wittenham comprises two main ponds set in a predominantly woodland context (broad-leaved and conifer woodland is present). There are also areas of grassland, with sheep grazing and arable bordering the woodland to the south and west. The River Thames is just to the north of the site, and a hill fort to the south. Large numbers of **great crested newts *Triturus cristatus*** have been recorded in the two main ponds, and research has revealed that they range several hundred metres into the woodland blocks.

Local Plan 2036 Preferred Options Document

8.2 Oxford City Council has produced a Local Plan 2036 Preferred Options document which sets out preferred and alternative options relating to strategic options for development, site allocations and development management policies.

8.3 The Oxford Local Plan Preferred Options Document

- Sets a capacity based target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims. As a result of this policy option the level of housing development proposed by the Local Plan is likely to generate a population increase of around 20,000 people.
- Continues to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford's administrative boundary
- Proposes to release 8 sites of about 18 hectares in total from the Oxford's Green Belt
- Protects key employment sites (category 1 and 2) from the loss to other non-employment uses
- allows employment sites that are not considered key to the Oxford's economy to be redeveloped eg for housing

- Continues to use the existing Area Action Plans eg West End AAP or Northern Gateway AAP as the basis for decisions on appropriate uses in those areas, rather than including detailed new site allocation policies

Screening Methodology

8.4 The HRA for the Core Strategy examined whether the policies within the Core Strategy would adversely affect the integrity of any European Sites within 20km of the City. Of the three sites that were within 20km of the Oxford, two (Cothill Fen SAC and Little Wittenham SAC) were screened out, and an Appropriate Assessment was undertaken on the Oxford Meadows SAC.

8.5 With regards to the Cothill Fen SAC and the Little Wittenham SAC it is considered that the Oxford Local Plan 2036 does not propose any policies or new allocations that would have a likely significant effect on those SACs. Therefore, it is proposed to screen those two designated sites out of the Assessment.

8.6 Table 2.1 explains the reasons for which the Oxford Meadows have been designated as an SAC. Natural England's report on the condition of the SSSI units that make up Oxford Meadows SAC from 6 July 2010 indicates that the Oxford Meadows SAC is in a favourable condition.[35]

8.7 The following are the key requirements to support the integrity of the Oxford Meadows SAC[36]:

- Minimal air pollution;
- Absence of nutrient enrichment of waters/ good water quality;
- Balanced hydrological regime – alteration to adjacent rivers may alter flooding regime and botanical diversity;
- Maintenance of traditional hay cut and aftermath grazing;
- Absence of direct fertilisation;
- Ensuring recreational impacts are maintained at a reasonable level[37];

8.8 In addition to the above requirements, this HRA considers the vulnerabilities listed in the Natura 2000 – Standard Data Form for the Oxford Meadows SAC submitted by DEFRA to the European Commission in December 2015[38]. This form states that the Oxford Meadows SAC is vulnerable to impacts from the following sources:

- Pollution to surface waters (limnic & terrestrial, marine & brackish);
- Invasive non-native species; and,
- Human induced changes in hydraulic conditions.

[35] Web-link to condition of SSSI units https://designatedsites.naturalengland.org.uk/
[36] Originally agreed at a screening workshop for the South East Plan
[37] Raised at a an HRA workshop for the Oxford Core Strategy
[38] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012845.pdf

8.9 Requirements for the maintenance of traditional hay cut and light aftermath grazing; and the absence of direct fertilisation are related only to the management of the SAC. They are not affected by the location of, for example, housing or employment development.

8.10 Also, the control of invasive species cannot be easily influenced by the planning regime. A Site Improvement Plan for the Oxford Meadows SAC[39] issued by Natural England in December 2014 highlights that the rare *Apium repens* could be affected by *Crassula* and other invasive species. However, the Plan does not indicate that the concern of C*rassula* spreading to the lower areas of Port Meadow could be dealt by control mechanisms directly linked to, or facilitated by new development. Instead, the Plan suggests that these mechanisms need to be identified at the national level. The other requirements are the subject of this report.

8.11 For the HRA of the Core Strategy, Natural England recommended that the effects of the plan be categorised in the form of a schedule. This approach has been adopted for the Oxford Local Plan 2036. This allows policies with no negative effect on European sites to be eliminated (screen out) from further appraisal, so that the appraisal can concentrate on those policies with possible effects.

8.12 The schedule previously applied by the City Council is as follows:

A – Policies or proposals cannot have any negative impact
B – Effects will be addressed in assessments "down the line", including project assessment under Regulation 48
C – Could have an effect, but would not be likely to have a significant (negative) effect (alone or in combination with other plans or projects)
D – Likely to have a significant effect alone and would require an Appropriate Assessment
E – Likely to have a significant effect in combination with other plans or projects and which require Appropriate Assessment of those combinations
F – Likely to have a significant effect, alone or in combination with other plans or projects, but which would not adversely affect the integrity of a European site
G – Likely to have a significant effect, alone or in combination with other plans or projects, and for which it cannot be ascertained that they would not adversely affect the integrity of a European site

How the preferred options were screened out of the assessment

8.13 This section sets out the considerations that have been given as to why certain options have been screened out in relation to each of the conservation objectives of the site.

[39] Available at: http://publications.naturalengland.org.uk/publication/4942743310696448

Air Quality

8.14 Increases in road transport are one of the most common causes of reduced air quality. Since Oxford has more jobs than economically active residents, it can be argued that any residential development within Oxford is more likely to reduce commuting into the city along the A34 and other strategic routes, rather than increase it, thus lessening impacts on the Oxford Meadows SAC. Uses such as student accommodation and extra care housing will attract very few trips because of the nature of the occupants. There is also a lack of parking associated with these types of developments. Many of the site allocations that have been screened out are for redevelopment or infill within existing sites. The hospital sites are an example of this. Any additional parking as a result of these developments is likely to be limited.

8.15 The University of Oxford academic developments have historically generated very little additional traffic and this approach is likely to continue.

8.16 The Oxford Local Plan 2036 directs retail to the district and city centres which have very good non-car accessibility. Finally employment sites such as the Business and Science Parks are on the other side of the city and are unlikely to attract much additional traffic along the A34.

8.17 With regards to traffic-related pollution from individual sites, Natural England has previously recommended looking at Interim Advice Note 61/05 (Guidance for Undertaking Environmental for Sensitive Ecosystems in Internationally Designated (Nature Conservation Sites and SSSIs)) which provides information about nitrogen deposition as well as Nitrogen Oxides (NO_x) emissions at the local scale. Interim Advice Note 61/05 states:

> *'If there are no Designated Sites within 200m of an affected road, there is no need to proceed further with this air quality assessment. If there is a Designated Site within 2km of a scheme so that an Appropriate Assessment is required, but there is no significant change in emissions from roads within 200m of the site, the site scheme will not result in a significant change in air quality and the effects of a change in air quality can be assumed to be negligible.'*

8.18 Individual sites were thus screened out from the assessment where there was no road link from the site within 200m of the Oxford Meadows SAC.

8.19 Recent case law, known as the Wealden judgement[40] has its implications on the method by which Natural England expects to see in-combination air pollution effects caused by a change in annual average daily traffic (AADT) flows assessed. Natural England have met with the Council to discuss screening under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) and provided the following advice on traffic-related pollution:

[40] A copy of the judgement is available at http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html

'Once allocations and policies have been selected, traffic modelling will be needed to determine whether traffic flows on roads within 200m of Oxford Meadows SAC will be increased by more than 1000AADT by the Local Plan, the level at which we advise that there are likely significant effects on the SAC, if this were the case appropriate assessment would be needed to understand whether there would be an adverse effect on the integrity of the SAC.
(…) an in-combination assessment of impacts on air quality at the SAC from traffic arising from surrounding authorities will be needed to look at whether the combined effect of development across the authorities would increase traffic on roads within 200m of Oxford Meadows SAC by 1000AADT or more, if this is the case appropriate assessment will be needed.'

8.20 Within the Plan period, development of new housing and employment sites in Oxford and neighbouring districts will generate a significant population increase. Cumulatively this may lead to increased road transport on the A34 and A40 that pass through, or within 200m of, Oxford Meadows SAC. Collaborative working on a county-wide strategic study is required to investigate impacts of the planned growth on air quality within the SAC adjacent to the A34 and A40. This strategic study will help to identify specific mitigation measures needed to ensure that there are no in-combination effects on Oxford Meadow SAC.

8.21 All the neighbouring Districts have now published HRAs as part of the preparation of their Local Plans. Table 2.4 on p55 of this report summarises key findings of the relevant HRAs. In terms of air quality within Oxford Meadows SAC an update of the 2014 Air Quality Assessment completed for the HRA of the emerging Cherwell Local Plan Part 1 Partial Review (2017)[41] is of particular relevance. The assessment concluded that the Plan in combination with the planned development in the rest of Oxfordshire by 2031, will not lead to any significant effects on the qualifying features of Oxford Meadows SAC. The air quality assessment found that the predicted marginal increases in NOx concentrations are inconsequential given existing baseline conditions and the limited extent of the area subject to the change, relative to the total SAC area. The assessment also highlighted that the condition of the Oxford Meadows SAC is currently favourable, despite existing NOx concentrations well above the critical level, and that small changes in NOx are therefore not considered to be significant.

Balanced Hydrological Regime

8.22 "Three main sources of water to the meads have been identified to support the plant communities on the Oxford Meadows SAC. These are direct rainfall, surface water, and groundwater flowing in from outside the area. Any of these sources, or a combination, may contribute to the soil water, which supports the plant communities on the meads[42]".

[41] Partial Review of the Cherwell LPP1 HRA is available at https://www.cherwell.gov.uk/info/83/local-plans/215/partial-review-of-cherwell-local-plan-2011-2031-part-1-oxfords-unmet-housing-need

[42] A. Dixon (2005), The Hydrology of Oxford Meadows

8.23 HRAs for the previous Development Plan Documents in Oxford ruled out the likelihood of impacts on the SAC from surface water and direct rainfall. The HRA for the Core Strategy explained that the abstraction licence for Farmoor Reservoir at present does not impact on the SAC, and no increases to this abstraction licence are proposed. As such the amount of surface water is likely to remain the same throughout the Local Plan period. Rainfall is a matter that planning cannot influence

8.24 The HRA Screening Report of the Draft Drought Plan (2016)[43] for Thames Water confirms that no likely significant effects are anticipated from the construction or operation of the Farmoor drought option on the Oxford Meadows SAC, either alone, or in combination with other licences and consents.

8.25 The Environment Agency's flood alleviation scheme for Oxford, which is likely to consist of enlargement of existing watercourses and/or creating flood relief channels, may affect the flooding regime of the River Thames. However, Natural England has stipulated that a key requirement of the Oxford flood alleviation scheme is that it does not have an adverse impact on the Oxford Meadows hydrological regime.

8.26 Figure 2.1 shows the location of the North Oxford Gravel Terrace in relation to the Oxford Meadows SAC. It should be read in conjunction with Figure 2.2 to provide the locational context of the direction of groundwater movement on the North Oxford Gravel Terrace.

[43] Available at: https://corporate.thameswater.co.uk/About-us/Our-strategies-and-plans/Our-drought-plan/Drought-plan-update-2017

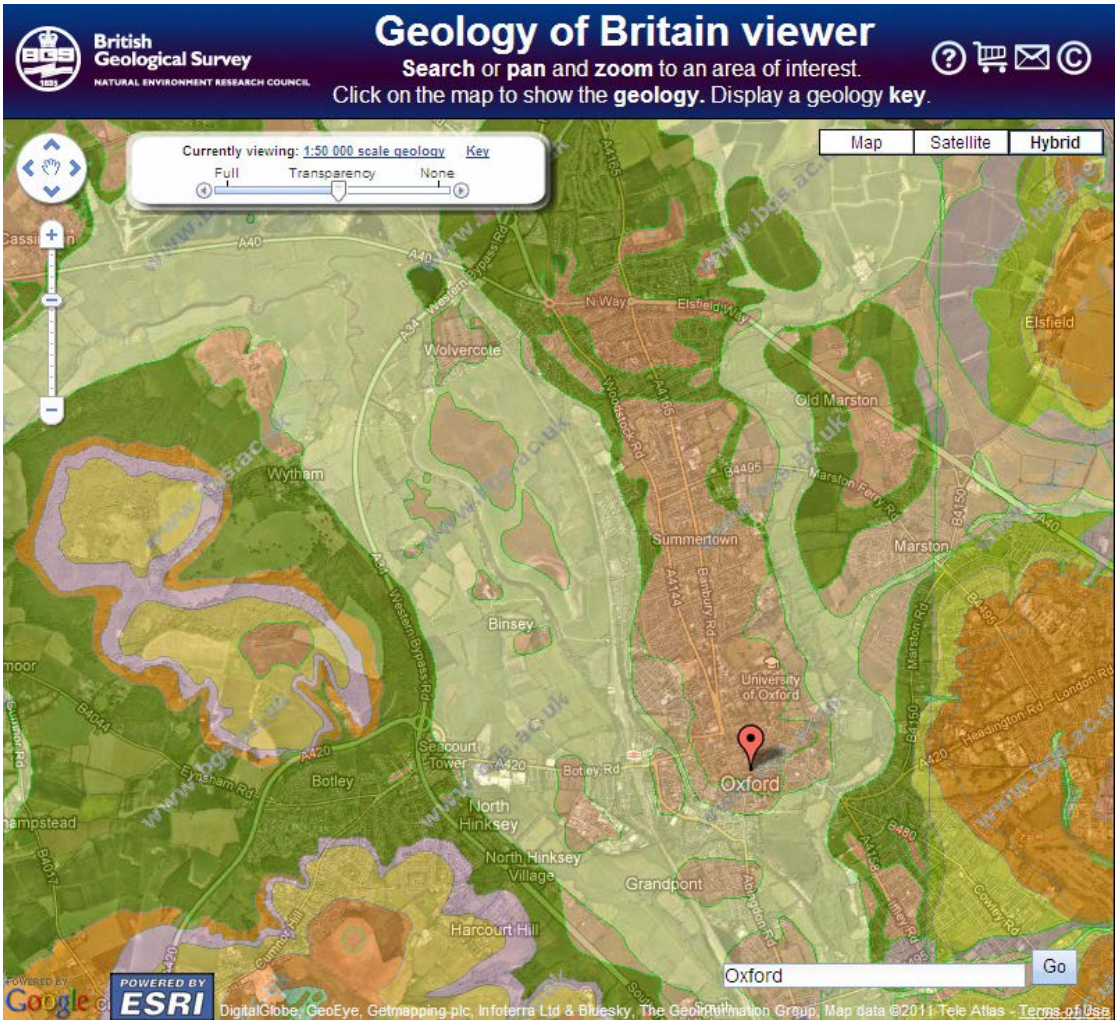


Figure 2.1 Map showing the North Oxford Gravel Terrace and Port Meadow within the context of Oxford. *(Reproduced with the permission of the British Geological Survey © NERC. All rights Reserved')*

8.27 Figure 2.2 (taken from the Core Strategy HRA) shows the geology of Oxford, including the Oxford Meadows SAC. It also shows a conceptual model of groundwater flow for Oxford including the area surrounding the Oxford Meadows SAC.

8.28 The model in Figure 2.2 shows that groundwater flows from the from the city centre away from the SAC. This means that proposed development at sites in this area will not affect the hydrology of the SAC since the direction of travel of the groundwater is away from the SAC.

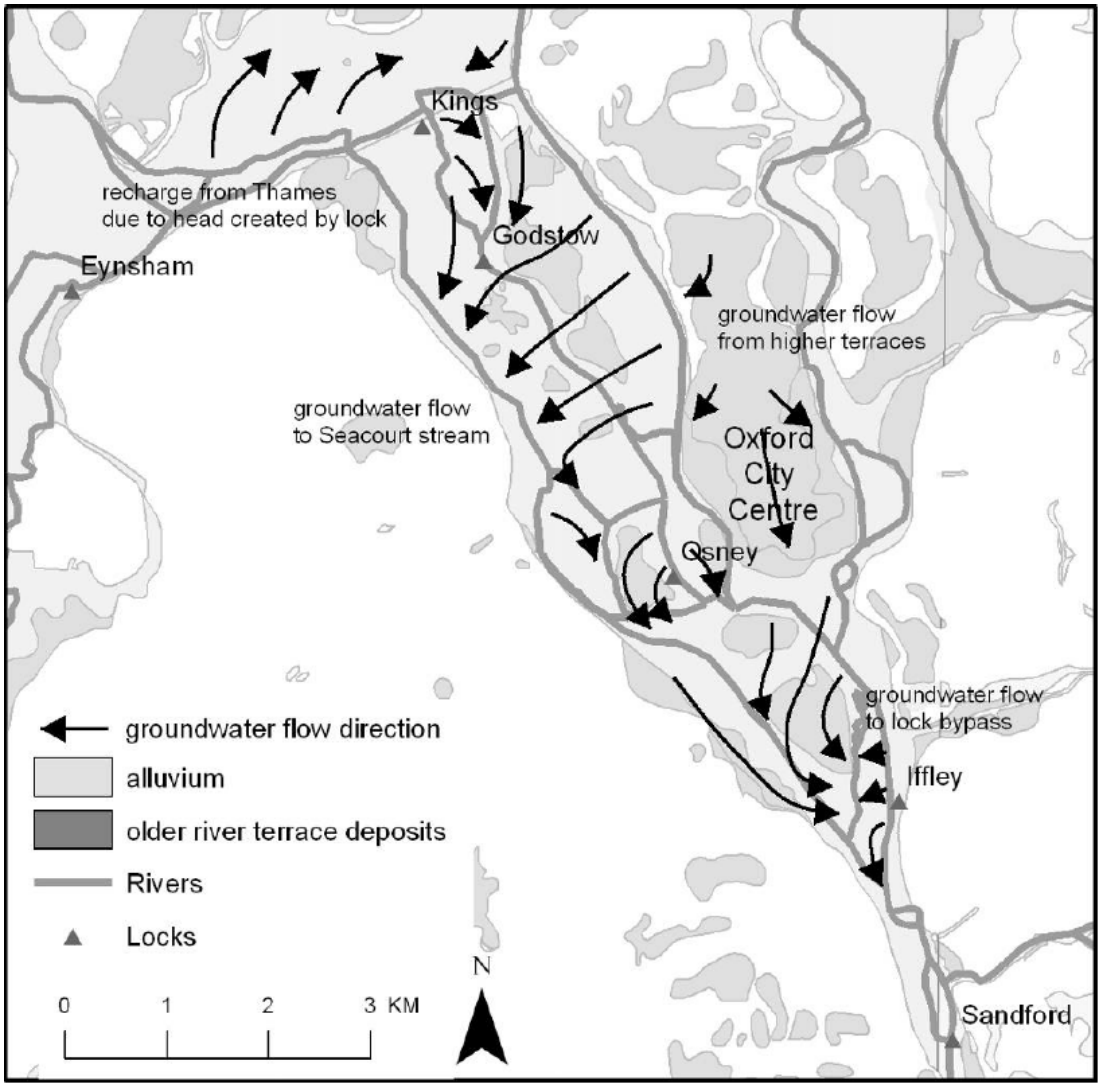


Figure 2.2: Conceptual groundwater flow model for Oxford (2007)[44]

Water Quality

8.29 Water quality issues were considered by the HRA for the Core Strategy, which resolved the issues of potential pollution through effluents from wastewater treatment works and potential groundwater pollution. The Sites and Housing Plan proposed some new sites on the North Oxford gravel terrace. The HRA for the Sites and Housing Plan noted that pollution of groundwater at these sites could impact on the water quality of the SAC. However, through additions to policy wording in the plan it was possible to ensure that these sites would not have an adverse impact on the water quality which supplies the SAC. It was also concluded that

[44] D MacDonald, A Dixon, *et al*, (2007) Investigating the Interdependencies between surface and groundwater in the Oxford area to help predict to timing and location of groundwater flooding and to optimise flood mitigation measures. Presented at the 42nd Flood and Coastal Management Conference,
York, 2007.

Sustainable Drainage should be used to ensure that the quality of groundwater would not be adversely affected.

8.30 This precautionary approach should continue and the site specific policies should require developers to ensure that surface water and groundwater quality are not affected by development. This approach should apply to any sites on the North Oxford gravel terrace that are proposed for allocation in the Oxford Local Plan 2036.

Recreational Impact

8.31 Previous Studies have shown that residents of Oxford are generally willing to walk approximately 1900m to large green spaces. As such, where a site is over 1900m away, the site has been screened out for recreational impacts. Non-residential sites within the 1900m buffer have also been screened out. Where a residential use is proposed within 1900m of the SAC, the location and the proximity of other green spaces sites have also been considered. Consideration has also been given to whether the site is proposed for student accommodation or houses/ flats.

8.32 It was previously confirmed by Natural England that *A. Repens* (creeping marshwort) is not particularly sensitive to trampling. However it is sensitive to dog-fouling. Student accommodation does not allow pets and as such this type of development has been screened out of the assessment process. Similarly all other non-residential uses which are proposed have been screened out of the assessment process since only residential development is likely to lead to an increase in dog-walkers at the SAC.

8.33 As recommended by Natural England a visitor survey was conducted for the HRA the Sites and Housing Plan in 2011. The aim of this survey was to understand how the Oxford Meadows SAC was used by the population of Oxford and by visitors from outside of the city. The results of the visitor survey are shown in Appendix 1. A new visitor survey based on the same methodology will be conducted to inform the current HRA and to assess how any additional recreational pressure from site specific development would impact on the SAC.

Screening Assessment

8.34 Table 2.2a looks at the preferred policy options (also see the schedule of the effects of the plan in para 2.12), and Table 2.2b looks at the site allocations. Preferred policy options have been screened out where it was considered that they were not likely to have a likely significant impact on the SAC. Individual site allocations have been screened out where it is considered that they are unlikely to have a significant impact on the SAC.

Table 2.2a Key environmental considerations that are likely to give rise to significant effects as a result of preferred policy options in Local Plan Preferred Options Document.

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
1. Protecting Category 1 employment sites	A	Policy approach seeking to protect Category 1 employment sites (key employment sites) from losses to other forms of development.	
2. Protecting Category 2 employment sites	A	Policy approach seeking to protect Category 2 employment sites from losses to other forms of development.	
3. Making best use of Category 3 employment sites	D	Policy approach would allow those sites not in Category 1 or 2 to come forward for redevelopment for alternative uses. This approach would allow additional sites to come forward for housing and other priority uses. Many of these sites will be relatively small and will be located in areas where residential redeveloped would, in principle, be compatible with the surrounding uses.	While this policy approach does not have a spatial focus, it is possible for some Category 3 employment sites to be located in the northern part of the city, where new housing developments (cumulatively) could increase environmental pressure on the designated site. It is important that any Category 3 employment sites that are located on the North Oxford Gravel Terrace and are lost to other uses (e.g., housing) do not have a negative impact on groundwater recharge at the Oxford Meadows SAC. The Oxford Local Plan 2036 should include policy mitigation measures to ensure that, as in previous HRAs, that basement developments are limited in areas on the

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
			North Oxford gravel terrace, unless it can be demonstrated that there will be no adverse impact on groundwater recharge. Although there are minimal risks to the SAC, this policy option should be taken forward for assessment as part of the Appropriate Assessment to ensure that that suitable mitigation in the form of appropriate policy wording can be developed.
4. Controlling low density B8 uses	A	This policy approach would encourage more efficient use of land and higher worker densities e.g. through change of use into other employment uses (B1, B2). Any such development is likely to be on previously developed land in existing built up areas. By seeking to make efficient use of previously developed land, the policy helps to reduce pressures on greenfield land and to steer development away from the Oxford Meadows SAC.	
5. Teaching and Research	A	Policy approach supporting the sustainable growth of the two universities and seeking to protect the established hospital sites. As a result new sites for further academic	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		activities such as teaching research, administration and ancillary activities are likely to be allocated. However, this policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are considered to be sufficient to minimise any adverse impacts on the designated site.	
6. Sites for small businesses and start-up spaces for other employment uses (e.g., creative industries, virtual offices)	A	This policy approach would allow diversification of Category 2 sites to continue to provide for local services and employment in preference to them being lost to other uses. Also this policy would support the enhanced role of city and district centres.	
7. New academic floor space for Private Colleges/ language schools	A	Policy approach restricting the expansion of existing language schools, summer schools and independent colleges for over 16s. This approach does not outline any	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		development proposals that could have an adverse effect on the Oxford Meadows SAC.	
8. Opportunities for local employment, training and business	A	This policy approach would require larger construction projects to ensure that opportunities are given to local firms to realistically bid for work. It also seeks to ensure greater training and employment opportunities are provided to local people. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
9. Overall Housing Target for the Plan Period	D	Policy stipulating a capacity based housing target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims. Current evidence indicates a capacity of just under 8,000 homes in the 20 year period to 2036 (HELAA).	The policy for the overall housing target for the plan period does not allocate specific sites for development but the amount of housing dictates the number of development sites that are allocated in the plan. Specific development sites will address the likely impacts on the SAC in more detail however as an overall approach this policy is taken forward in terms of recreational impacts, air quality and water (balanced hydrological regime and quality).

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
			This policy approach is considered to have no likely significant effects on the designated site but the allocations arising from it will need to be considered so this option has been taken forward for further assessment as part of the appropriate assessment.
10. Determining the priority types of Affordable Housing	A	Policy option for determining the type of affordable housing to be accepted as part of qualifying developments. Policy does not itself lead to development.	
11. Determining the approach to setting the level of the Affordable Housing Requirement	A	Policy option for determining the proportion of affordable housing to be accepted as part of qualifying developments. Policy does not itself lead to development.	
12. Meeting intermediate housing or employment sector specific needs based on local affordability approaches (combines and adapted from the	A	Policy option for determining the type of affordable housing to be accepted as part of qualifying developments. Policy does not itself lead to development.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
options assessments for "New Housing for Key Workers" (12a) and "Types of Key Worker Housing" (12b))			
13. Providing Affordable Housing from larger sites	A	Policy option for determining which proposals and sites will be required to provide on-site affordable housing as part of any scheme. Policy does not itself lead to development.	
14. Affordable Housing financial contributions from small sites	A	Policy option for determining which residential developments will be required to make an off-site financial contribution towards affordable housing. Policy does not itself lead to development.	
15. Contributions towards affordable housing from other development	A	Policy option for determining which non-residential (C3) developments will be required to make an off-site financial contribution towards affordable housing. Policy does not itself lead to development.	
16. Mix of dwelling sizes to	A	Policy option ensuring an appropriate and balanced mix of housing is provided as part	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
maintain and deliver balanced communities ('balance of dwellings')		of new developments. Policy does not itself lead to development	
17. Thresholds for mix of dwelling sizes ('balance of dwellings')	A	Policy option for determining the threshold at which the policy on mix of dwelling sizes would apply. Policy does not itself lead to development.	
18. Change of use from existing homes/ loss of dwellings	A	Policy option for determining whether development proposals that result in the net loss of existing homes would be acceptable. Policy does not itself lead to development	
20. Linking the delivery of new University academic facilities to the delivery of University provided residential accommodation	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are considered to be sufficient to minimise any adverse impacts on the designated site.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
21. New Student Accommodation	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are considered to be sufficient to minimise any adverse impacts on the designated site.	
22. Older persons' accommodation	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are considered to be sufficient to minimise any adverse impacts on the designated site.	
23. Accommodation for Travelling Communities	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		considered to be sufficient to minimise any adverse impacts on the designated site.	
24. Homes for Boat Dwellers	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Additionally, policy mitigation measures for any development with a potential adverse impact on SAC (e.g. on hydrology & water recharge) are considered to be sufficient to minimise any adverse impacts on the designated site.	
25. Privacy and Daylight	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
26. Housing Internal Standards	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
27. Outdoor standards	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
28. Accessible and Adaptable	A	This policy approach does not outline any development proposals that could have an	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
Homes		adverse effect on the Oxford Meadows SAC.	
29. Making use of Previously Developed Land	A	Policy approach focusing development primarily on previously developed land and specific greenfield sites that have been identified as suitable for allocation. By seeking to make efficient use of previously developed land, the policy helps to reduce pressures on greenfield land and to steer development away from the Oxford Meadows SAC.	Summertown is identified as a District Centre and as such it is likely that some additional residential and non-residential development would be delivered on brownfield sites in this location. Any sites allocated for development within Summertown will be captured in the site allocations and bespoke policy wording to mitigate likely impacts will be captured through this process. As such this policy is screened out from the assessment.
30. Density and Efficient Use of Land	A		This policy option requires that development proposals make the best use of site capacity. This policy is likely to result in higher density schemes coming forward in suitable locations such as district centres. Some additional development on brownfield sites in the Summertown area is likely to come forward, Any sites allocated for development within Summertown will be captured in the site allocations and bespoke policy wording to mitigate likely impacts will be captured through this process. As such this policy is screened out from the assessment.
31. Green Belt	A	This policy approach does not outline any	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		development proposals that could have an adverse effect on the Oxford Meadows SAC.	
32. Efficient Energy Design & Construction	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
33. Carbon Reduction in non-residential development (BREEAM)	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
34. Carbon Reduction in residential development (combines options assessment tables on "Renewable Energy from residential development" and "Percentage	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
of renewable energy from residential development")			
35. Sustainable retrofitting of Existing Buildings	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
36. Water Efficiency (residential)	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
37. Community Energy Schemes, heat networks and Combined Heat and Power	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
38. Flood Risk Zones	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. Also, this policy option would allow development on brownfield sites in floodplains where evidence shows this development would have a neutral or positive effect on water retention and	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		storage.	
39. Flood Risk Assessment	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
40. Sustainable Drainage	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC. SuDS can offer a wide range of ancillary benefits including improved water quality, increased tolerance of droughts and enhanced amenity and habitat features. Therefore, this option can have a positive effect on the designated site.	
41. Surface and groundwater flow and groundwater recharge	A	This policy approach would seek to ensure that development involving underground structures does not adversely affect groundwater flow to springs and rivers. This policy approach acts as mitigation that will help to maintain the current hydrological regime of Oxford Meadows SAC, in terms of water quantity or quality.	
42. Health Impact Assessment	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		SAC.	
43. Air Quality Assessments	A	This policy approach would require Air Quality Assessment for all major developments, or any other development considered to have a potentially significant impact on air quality. This is likely to have a positive effect on the Oxford Meadows SAC.	
44. Air Quality Management Area	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
45. Protection of future occupants against nuisances such as noise and light	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
46. Lighting and Light pollution	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
47. Noise and Noise Pollution	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
48. Contaminated Land	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
49. Managing the overall amount of Public Open Space in Oxford	A	Policy approach seeking to protect green spaces that are important Green Infrastructure and improve the quality of green spaces. This approach should help reduce recreational pressures on the Oxford Meadows SAC.	
50. Creating a green infrastructure policy designation	A	Policy approach seeking to create a new 'Green Infrastructure Network' designation for the green spaces that are worthy of protection for their social, environmental and economic functions. This policy approach prioritises the protection of designated GI sites, including the SAC.	
51. Securing net gain in green infrastructure provision	A	Policy approach that aims to deliver new public open spaces. This approach should help reduce recreational pressures on the Oxford Meadows SAC.	
52. Ensuring that new developments	A	Policy approach seeking to protect green infrastructure features such as hedgerows, small clusters of trees etc. This policy	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
improve the quality of Green Infrastructure		approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
53. Biodiversity sites, wildlife corridors. Species protection independent ecological assessment (accounting)	A	This policy approach prioritises the protection of sites of biodiversity interest and designated sites, including the SAC.	
54. Playing pitches	A	Policy approach outlining strong protection for playing pitches whilst also providing flexibility to respond to changes in playing pitch supply and demand over time where specific criteria are met in line with national policy requirements. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
55. Allotments	A	Policy approach seeking to protect allotments. This policy approach does not	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
56. Protecting and promoting watercourses – making more of blue infrastructure	A	Policy approach seeking to enhance watercourses and improve access to blue infrastructure. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC	
57. Species enhancement in new developments	A	Policy approach seeking ecological enhancements in the built development. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC	
58. Trees affected by new development	A	Policy approach seeking the retention of existing trees and the planting of new trees. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC	
59. Green/ brown roofs and walls	A	Policy approach seeking the creation of green features within new developments.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
60. Enhanced walking and cycling connections	D	Policy approach seeking improvement to walking and cycling connections.	It will be important to ensure that enhanced access to the GI network does not conflict with the management of the Oxford Meadows SAC and does not increase recreational pressures on the designated site.
61. Creating successful places	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
62. Responding to Oxford's character and context	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
63. Creating an integrated high quality public realm and setting of buildings	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
64. Secure by design	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
65. High quality design of new buildings (see	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
"detailed design" assessment table)		SAC.	
66. Building heights	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
67. Altering existing buildings	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
68. Shop-fronts and signage	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
69. Stores for bikes, waste and recycling	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
70. High Buildings, view cones and high building area	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
71. Listed buildings and	A	This policy approach does not outline any development proposals that could have an	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
their setting		adverse effect on the Oxford Meadows SAC.	
72. Assets of Local Heritage Value	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
73. Conservation areas	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
74. Important parks and gardens	A	Policy approach seeking to protect important parks and gardens. This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
75. Scheduled Monuments	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
76. Defining areas likely to have archaeological deposits	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
77. Provisions for site that include archaeological remains	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
78. Archaeological remains within Listed Buildings	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
79. Transport Assessments and Travel Plans (include servicing and delivery plans)	A	This policy approach will encourage measures which reduce the need to travel and manage congestion. This approach should help improve air quality in Oxford and therefore have a positive effect on the Oxford Meadows SAC.	
80. Supporting city-wide pedestrian and cycle movement	A	This policy approach will encourage walking and cycling and reduce the need to travel by car. This approach should help improve air quality in Oxford and therefore have a positive effect on the Oxford Meadows SAC.	
81. Supporting walking, cycling and public transport access to new	A	This policy approach will encourage walking and cycling and reduce the need to travel by car. This approach should help improve air quality in Oxford and therefore have a positive effect on the Oxford	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
developments		Meadows SAC.	
82. Tourist coaches	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
83. Scheduled coaches (i.e. long distance coaches to London and the airports)	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
84. Safeguarding Cowley Branchline	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
85. Car Parking standards- residential	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
86. Car Parking standards- non-residential	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
87. Controlled parking zones (CPZ)	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		SAC.	
88. Cycle parking standards – Residential	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
89. Cycle parking standards – Non – Residential	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
90. Off-street public car parking	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
91. Hierarchy of centres for town centre uses	A	Policy promoting development that attracts large numbers of people in the City centre (in line with the sequential test). Policy promoting development of an appropriate size and scale for the district centres and neighbourhood centres.	Summertown is still allocated as a District Centre, as such development of an appropriate scale will be encouraged here. Any sites allocated for development within Summertown will be captured in the site allocations and bespoke policy wording to mitigate likely impacts will be captured through this process. As such this policy is screened out from the assessment.
92. Widening the role of district centres	A	Policy promoting development that attracts large numbers of people in the City centre (in line with the sequential test). Policy promoting development of an	Summertown is still allocated as a District Centre, as such development of an appropriate scale will be encouraged here. Any sites allocated for development within Summertown will be captured

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		appropriate size and scale for the district centres and neighbourhood centres.	in the site allocations and bespoke policy wording to mitigate likely impacts will be captured through this process. As such this policy is screened out from the assessment.
93. The "sequential approach" and "sequential test": location of town centre uses	A	Policy setting out the sequential test (spatially), Summertown is still allocated as a District Centre, as such development of an appropriate scale will be encouraged here. Policy seeking to ensure positive measures are taken to promote economic growth through a greater mix of uses, both commercial and residential at District Centres, including Summertown.	Summertown is already well developed, so any development (other than the strategic site - dealt with separately) is likely to be on Brownfield land. Any sites allocated for development within Summertown will be captured in the site allocations and bespoke policy wording to mitigate likely impacts will be captured through this process. As such this policy is screened out from the assessment.
94. "Impact Assessment": threshold for requiring an impact assessment for applications for town centre uses that are not located in	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
existing centres			
95. Primary and Secondary Shopping Frontages of the City Centre	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
96. Primary and Secondary Shopping Frontages of District and Local Centres	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
97. Evening economy: cultural and social activities	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
98. Tourist/Visitor Attractions	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
99. Short-stay accommodation (hotels and guest houses)	A	This policy provides more detail in terms of supporting hotels and guest houses which, in principle are covered by option 93	
100.	A	This policy approach does not outline any	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
Infrastructure and developer contributions		development proposals that could have an adverse effect on the Oxford Meadows SAC.	
101. Delivering High Quality Ubiquitous Digital Infrastructure	A	This policy approach does not outline any development proposals that could have an adverse effect on the Oxford Meadows SAC.	
102. Waste water and sewerage infrastructure	A	This policy approach does not outline any proposals that could have an adverse effect on the Oxford Meadows SAC.	
103. Access to education (state primary and secondary schools)	A	Currently, this policy approach does not outline any proposals that could have an adverse effect on the Oxford Meadows SAC.	
104. Primary healthcare services	A	Currently, this approach does not outline any proposals that could have an adverse effect on the Oxford Meadows SAC	
105. Community facilities	A	This policy approach does not outline any proposals that could have an adverse effect on the Oxford Meadows SAC.	
106. Pubs	A	This policy approach does not outline any proposals that could have an adverse	

Preferred Options	Categorisation of the effects of elements of the policy option	If the option has no effect, then reasons why	Key environmental considerations likely to give rise to significant effects
		effect on the Oxford Meadows SAC.	
107. Area Action Plans	A	This policy approach does not include any new proposals that could have an adverse effect on the Oxford Meadows SAC.	

Table 2.2b Key environmental considerations that are likely to give rise to significant effects as a result of development of the sites proposed for further consideration in Local Plan Preferred Options Document.

Site ID	NAME	If the policy has no effect, then reasons why	
SITES AND HOUSING PLAN			
003	Summertown Strategic Site Summertown	Site located more than 1.9km away from SAC. It has been screened out of the assessment for: **Air Quality and Recreational Impacts**	Possible impacts on SAC – balanced hydrological regime and water quality. This site could be in an area where basement development could have an impact on groundwater flow.
006	Banbury Road University Sites North	This site is proposed for academic institutional uses, student accommodation and faculty housing. It has been screened out of the assessment for: **Air Quality and Recreational Impacts**	Possible impacts on SAC – balanced hydrological regime and water quality. The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
011	Canalside Land, Jericho	This site is proposed for a mixed use development including residential and a replacement operating boatyard. It has been screened out of the assessment for: **Air Quality and Water quality/ Balanced Hydrological Regime.**	Possible Impacts on SAC – residential – recreation)
018	Diamond Place and Ewert House	Site located more than 200m away from SAC. This site is proposed for a retail-led mixed use scheme which could also include residential, employment and student accommodation. It has been	Possible impacts on SAC – recreational impacts, balanced hydrological regime and water quality The Environment Agency has previously suggested that this site could be in an

		screened out of the assessment for: **Air Quality**	area where basement development could have an impact on groundwater flow.
020	Elsfield Hall Wolvercote	Site located more than 200m away from SAC. It has been screened out of the assessment for: **Air Quality**	Possible impacts on SAC – balanced hydrological regime and water quality. This site could be in an area where basement development could have an impact on groundwater flow.
049	Oxford University Press Sports Ground, Jordan Hill	Site located more than 200m away from SAC. This site is proposed for residential development and student accommodation. It has been screened out of the assessment for: **Air Quality**	Possible impacts on SAC – balanced hydrological regime and water quality. This site could be in an area where basement development could have an impact on groundwater flow.
062	University of Oxford Science Area & Keble Road Triangle	Site located more than 200 away from SAC and not on the North Oxford Gravel Terrace. This site is proposed for academic institutional uses. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
065	West Wellington Square	This site is proposed for academic institutional uses and student accommodation. It has been screened out of the assessment for: **Air Quality and Water quality/ Balanced Hydrological Regime.**	Although the Environment Agency previously considered that basement development at this site could impact on groundwater flows, the groundwater flow map (figure 2.1) does not indicate that flows are likely to be towards the Oxford Meadows SAC.
067	Wolvercote Paper Mill Wolvercote		Possible Impacts on SAC – residential led

			development with some employment units. Possible impacts on SAC from air pollution, recreational pressure and water quality/ water flow regime issues. The Environment Agency do not consider that basement development at this site would have an impact on groundwater flow however, given its proximity to the Oxford Meadows (and thus application of the precautionary principle) it has not been screened out for impacts associated with the balanced hydrological regime of the Oxford Meadows SAC and water quality. It is possible that hydrocarbon contamination may be present. In any remediation work that may be necessary, it is important that the quality of water provided to the Oxford Meadows SAC is not contaminated.
PDL			
349	Old Power Station	This site is proposed for housing and student accommodation It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime**	Possible impacts on SAC – recreational impacts
356	276 Banbury Road Summertown	This site is proposed for a retail-led mixed use scheme which could also include residential, employment and	Possible impacts on SAC – recreational impacts, balanced hydrological regime and water quality

		student accommodation. It has been screened out of the assessment for: **Air Quality**	The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
570	Rewley Abbey Court	This site is proposed for student accommodation It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
580	Summertown House	This site is proposed for student accommodation. It has been screened out of the assessment for: **Air Quality**	Possible impact on SAC – balanced Hydrological regime and water quality impacts. The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
GREEN BELT SITES			
107	Green Belt land St Frideswide Farm Wolvercote	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality**	Possible impacts on SAC – recreational impacts, balanced hydrological regime and water quality
112a1	Green Belt land at Cherwell Valley/Old Marston	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced**	

		Hydrological Regime and Recreational impacts.	
112b1	Green Belt land at Cherwell Valley/Old Marston	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
114d	Marston Paddock Marston	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
590	Pear Tree Farm Wolvercote	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality**	Possible impacts on SAC – recreational impacts, balanced hydrological regime and water quality
RESTRICTED ACCESS GREEN SPACES			
125	Summer Field School athletics site	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality, Recreational Impacts**	Possible impact on SAC – balanced hydrological regime and water quality The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
309	Summer Fields School Playing Field	This site is proposed for residential development. It has been screened out of the assessment for: **Air Quality, Recreational Impacts**	Possible impact on SAC – balanced hydrological regime and water quality The Environment Agency has previously suggested that this site could be in an

			area where basement development could have an impact on groundwater flow.
569	Green Templeton College North	This site is proposed for student accommodation and sports use. It has been screened out of the assessment for: **Air Quality, Recreational Impacts**	Possible impacts on SAC – balanced hydrological regime and water quality.
Employment sites for protection/site-specific allocations			
122	New Barclay House	This site is in existing employment use It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
499	Builders Yard, Lamarsh Road	This site is identified as protected employment category. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
523	University Press, Walton Street Jericho	This site is in existing employment use and is identified as protect employment (Category 1) land. It has been screened out of the assessment for: **Air Quality, Recreational Impacts**	Possible impacts on SAC – recreational impacts, balanced hydrological regime and water quality. The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
579	ROQ Site North	This site is being developed for academic	Possible impact on SAC – balanced

		institutional uses and student accommodation. It has been screened out of the assessment for: **Air Quality, Recreational Impacts**	hydrological regime and water quality The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
512	Jordon Hill Business Park, Banbury Road	This site is in existing employment use and is identified as protect employment (Category 1) land. It has been screened out of the assessment for: **Air Quality , Recreational Impacts**	Possible impact on SAC – balanced hydrological regime and water quality The Environment Agency has previously suggested that this site could be in an area where basement development could have an impact on groundwater flow.
513	King Charles House, Park End Street	This site is in existing employment use It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime and Recreational impacts.**	
586	Osney Mead (whole site)	This site is in existing employment use and is identified for mixed-use development that may include residential. It has been screened out of the assessment for: **Air Quality, Water quality/ Balanced Hydrological Regime**	Possible impacts on SAC – recreational impacts.

Table 2.3 Possible Impacts of the Local Plan Preferred Options document on the Oxford Meadows SAC

Nature	Policies or site allocations likely to have an impact on the SAC	Magnitude	Duration	Location	Conclusions
Air Pollution Impacts	<u>Policy Options</u> Opt 3 Making best use of Category 3 employment sites Opt 9 Overall housing target for the plan period <u>Sites</u> 67 – Wolvercote Paper Mill	A residential-led scheme for 190 dwellings is proposed with a resolution to grant outline planning permission (13/01861/OUT). The Paper Mill site has a link road within 200m of the SAC.	It is anticipated that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period (up to 2036).	Less than 500m from the SAC	The Wolvercote Paper Mill site is the only site that has a road that runs within 200m of the Oxford Meadows SAC on which there is likely to be an increase in vehicle movements. This site, along with the cumulative impacts of other plans and programmes, in relation to air quality impacts is to be looked at as part of Stage 2 – Appropriate Assessment. It is worth noting that previous air quality modelling undertaken

					as part of the HRA for the Northern Gateway AAP led to a conclusion that development at the Wolvercote Paper Mill site would not have an adverse impact on the Oxford Meadows SAC
Balanced Hydrological Regime (Groundwater)	<u>Policy Options</u> Opt 3 Making best use of Category 3 employment sites Opt 9 Overall housing target for the plan period <u>Sites</u> 3 - Summertown Strategic Site 6 - Banbury Road University Sites 18 - Diamond Place and Ewert House, Summertown	Where sites are located on the Gravel Terrace, it is important that the same amount of surface water is able to recharge the groundwater after development is completed.	It is anticipated that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period (up to 2036).	Sites are all on or near the North Oxford Gravel Terrace.	The following sites are taken forward to the "Stage 2 – Appropriate Assessment". These sites are all on, or near the North Oxford Gravel Terrace. Policy provision exists in the Local Plan 2016 to ensure groundwater quality, flow and recharge is not impeded by development. A similar policy is being developed for the Local Plan 2036. In each of the respective

	20 - Elsfield Hall, Elsfield Way 49 - Oxford University Press Sports Ground, Jordan Hill 67 – Wolvercote Paper Mill 107 - Green Belt land St Frideswide Farm Wolvercote 125 - Summer Fields School athletics site St Margaret's 309 - Summer Fields School Playing Field 356 - 276 Banbury Road Summertown 512 - Jordon Hill				allocation policies in the Sites and Housing Plan there is a requirement to resist basement development unless it can be demonstrated that there will be no adverse impacts on groundwater quality, flow or recharge. A similar policy approach is being investigated as part of the allocation process. The Stage 2 – Appropriate Assessment stage is likely to make recommendations as to the precise wording of these policies to ensure that there are no adverse impacts on the Oxford Meadows SAC.

	Business Park, Banbury Road Wolvercote 523 - University Press, Walton Street Jericho and Osney 569 - Green Templeton College North 579 - Radcliffe Observatory Quarter Site North 580 – Summertown House, Apsley Place 590 - Pear Tree Farm Wolvercote				
Water Quality	<u>Sites</u> 3 - Summertown Strategic Site 6 - Banbury Road University Sites	Where sites are located on the Gravel Terrace, it is important that the quality of surface water that is recharged to groundwater	It is anticipated that all sites will be developed within the Local Plan period. Any impacts would	Sites are all on or near the North Oxford Gravel Terrace.	See comments above for balanced hydrological regime.

	18 - Diamond Place and Ewert House, Summertown 20 - Elsfield Hall, Elsfield Way 49 - Oxford University Press Sports Ground, Jordan Hill 67 – Wolvercote Paper Mill 107 - Green Belt land St Frideswide Farm Wolvercote 125 - Summer Fields School athletics site St Margaret's 309 - Summer Fields School Playing Field 356 - 276 Banbury Road Summertown	is maintained after development is completed.	therefore occur within this period (up to 2036).		

	512 - Jordon Hill Business Park, Banbury Road Wolvercote 523 - University Press, Walton Street Jericho and Osney 569 - Green Templeton College North 579 - Radcliffe Observatory Quarter Site North 580 – Summertown House, Apsley Place 590 - Pear Tree Farm Wolvercote				
Recreational Impact	<u>Policy Options</u> Opt 3 Making best use of Category 3 employment sites Opt 9 Overall housing				

	target for the plan period Opt 60 Enhanced walking and cycling connections <u>Sites</u> 6 - Banbury Road University Sites 11 - Canalside Land, Jericho 18 - Diamond Place and Ewert House, Summertown 20 - Elsfield Hall, Elsfield Way 49 - Oxford University Press Sports Ground, Jordan Hill 62 - University of	Student Accommodation. Low/ no impact on SAC Residential. Possible impact on SAC Residential. Possible impact on SAC Residential/ Employment. Possible impact on SAC Residential. Possible impact on SAC Academic Institutional	It is anticipated that all sites will be developed within the Local Plan period. Any impacts would therefore occur within this period (up to 2036).	All sites within 1900m of the SAC	Sites were screened out of this part of the assessment where there was no residential uses proposed. There is likely to be a limited amount of recreational pressure as a result of this development for instance, as a result of people having their lunch on Port Meadow in the summer months. However, dog-fouling is considered to be more of an issue. This is discussed further in section 3 of the HRA.

	Oxford Science Area & Keble Road Triangle 65 - Wellington Square West 67 – Wolvercote Paper Mill 107 - Green Belt land St Frideswide Farm Wolvercote 349 - Old Power Station 356 - 276 Banbury Road Summertown 512 - Jordon Hill Business Park, Banbury Road Wolvercote	Uses No/Low impact on SAC Residential/student accommodation/academic institutional uses. Possible impact on SAC Residential. Possible impact on SAC Residential. Possible impact on SAC Residential/student accommodation/academic Possible impact on SAC Residential/ Retail/Employment. Possible impact on SAC Employment use. No/ low impact			Sites for student accommodation were also screened out of the assessment. It was agreed with Natural England that dog fouling was more of a threat to the Oxford Meadows SAC than trampling. Consultation with the Oxford Rare Plants Group confirmed that A. repens (creeping marshwort) is not particularly sensitive to tramping but is more sensitive to dog fouling. Since there are no pets allowed in purpose-built student accommodation, it was considered that this would not be likely to be an issue. Student

	523 - University Press, Walton Street	Employment/ Academic Institutional Uses. No/ Low Impact			
	569 - Green Templeton College North	Student accommodation. No/Low Impact			
	579 - Radcliffe Observatory Quarter Site North	Academic Institutional Uses/ student accommodation. No/Low Impact			
	580 – Summertown House, Apsley Place	Housing/student accommodation. Possible impact on SAC			
	586 - Osney Mead	Mixed use including housing, student accommodation, employment, retail, academic Possible impact on SAC			
	590 - Pear Tree Farm Wolvercote	Housing/student accommodation. Possible impact on SAC			

Other Plans and Programmes (in-combination impacts)

8.35 In line with the precautionary principle, Oxford City Council has considered impacts that could be caused in-combination with other plan areas. The plans and programmes shown at Table 2.4 have been considered in relation to the HRA of the Oxford Local Plan Preferred Options.

Table 2.4 Other plans and programmes with potential 'in combination' impacts

Policy, Plan, Strategy/ Initiative	Proposals	Potential 'in combination' impacts?
Oxfordshire Minerals and Waste Local Plan Part 1 Core Strategy Habitats Regulations Assessment Screening Report August 2015	It provides a policy framework for identifying sites for new minerals and waste development and for making decisions on planning applications.	The HRA concluded that the Core Strategy would not have a likely significant effect on air quality, water resources, recreation, hazardous and radioactive materials.
Oxford's Local Plan (includes Northern Gateway AAP/ Barton AAP/ West End AAP)	Include a number of residential, employment and mixed-use allocations and provides a policy framework for making decisions on planning applications.	HRAs ruled out impact on the Oxford Meadows SAC
LTP4 (2015-2030) June 2015	LTP4 sets out proposed transport solutions for the county up to 2031.	The HRA Screening found that no likely 'strategic' significant effects are predicted from the local transport plan (LTP) on any European sites, subject to appropriate design and mitigation.
Partial Review of the Cherwell Local Plan 2011-2031 (Part 1): Oxford's Unmet Housing Needs	The Plan sets out the policies for meeting Oxford's unmet housing need in the Cherwell district	The HRA Screening found that no likely significant effects are predicted from the Plan on any European sites, subject to appropriate design and mitigation
South Oxfordshire Local Plan (2011-2033)	The Draft South Oxfordshire Local Plan sets out the policies which will be used to assess planning proposals for development of 23,468, homes.	The HRA concluded that air pollution impacts relating to the Local Plan alone and in combination with other plans or projects can be screened out for Oxford Meadows SAC.
Vale of White Horse District Council: Local Plan Part 1	The Plans identify the number of new homes	The HRAs did not consider that any of the DM policies

and 2 (2031)	(22,760) to be provided in the area within the plan period up to 2031.	contained within the LPP 1 and 2 would lead to likely significant effects on European sites. The HRA for the LPP2 concluded that given the incorporation of policies to address air quality and subject to development of strategic air quality studies relating to Oxford Meadows SAC, the LPP2 will not lead to likely significant effects on European sites either alone, or in combination with other plans and projects.
West Oxfordshire Draft Local Plan 2031	The Plan sets out the policies which will be used to assess planning proposals for development of 10,500 new homes within the plan period.	The West Oxfordshire Pre-Submission Local Plan will not have a likely significant effect on the Oxford Meadows SAC. The additional housing in the Partial Review Proposed Submission Plan will not have a likely significant effect on the Oxford Meadows SAC and the policies within the adopted local plan will still apply. Therefore, there is no potential for in-combination effects.
Chiltern Railways Evergreen 3 project (now known as East West Rail Phase 1)	Rail project	Scheme results in the permanent loss of 13m2 from the margins of the Oxford Meadows SAC. This loss is not predicted to affect the integrity of the SAC. Air emissions may affect habitats including those with the Oxford Meadows. An approach involving the monitoring of vegetation has been agreed with Natural England, to identify any habitat changes, and to ensure that timely measures can be taken, if necessary to prevent adverse effects on the integrity of the Oxford Meadows SAC[45]

[45] Chiltern Railways (Bicester to Oxford Improvements) Order Environmental Statement NTS January 2010

Thames Water Utilities Ltd the Draft Drought Plan (2016)	Water Management Plan	The HRA Screening concluded that the Draft Drought Plan will not in any way result in any significant effect on the Oxford Meadows SAC and therefore there is no potential for in-combination effects.
Oxford Flood Risk Management Strategy	Flooding improvements across Oxford and surrounds	Report suggests that there may be impacts on Oxford Meadows SAC from flood risk management and water resource plans. There are some uncertainties regarding operation of a flood storage area and potential impacts on Oxford Meadows SAC. To address these uncertainties, the Environment Agency is recommending further research. If this work shows that there would be significant impacts to designated nature conservation sites which could not be mitigated or compensated for, then the flood storage area will not be implemented. However there are no likely significant impacts on the SAC from current water abstraction activities. [46]

[46] Page 39 of report and confirmed in Supporting Guidance: Habitats Directive:(Appendix 21) Proforma for Stage 3 Assessment of Adverse Effect on Site Integrity – Review of Consents (Environment Agency, 11/07/05)

Screening Conclusions

8.36 Table 2.3 suggests that three of the preferred policy options (Opt 3 Making best use of Category 3 employment sites; Opt 9 Overall housing target for the plan period and Opt 60 Enhanced walking and cycling connections) and a number of sites included for further consideration in the Local Plan Preferred Options Document are likely to give rise to significant effects as a result of their development. These proposed preferred policy options and allocations have potential impacts on following conservation objectives for the SAC with regards to the following:

- Air pollution;
- Water quality;
- Balanced hydrological regime; and
- Increased recreational pressure

8.37 These will be discussed further at Section 3 (Stage 2 Appropriate Assessment).

8.38 It has been possible to screen out some of the impacts on the Oxford Meadows SAC:

- Maintenance of traditional hay cut and light aftermath grazing
- Absence of direct fertilisation

8.39 These have been screened out as they are related to activities directly at the site, which the Oxford Local Plan 2036 will not affect.

Appendix B. Oxford Meadows SAC Visitors Survey Report

OXFORD MEADOWS SAC VISITORS SURVEY REPORT

INTRODUCTION

A visitor survey of Oxford Meadows was commissioned to understand how the site is currently used by the population of Oxford and by visitors from outside of the city.

METHOD

Through discussions with Natural England and investigations of best practice examples, an on-site visitor survey questionnaire was designed.

The survey was carried out:

- on 6 days including a range of weekend and weekday dates (20 Oct. 2017, 21 Oct. 2017, 23 Oct. 2017, 30 Oct. 2017, 31 Oct. 2017, 02 Nov. 2017)
- both within and outside of the school October half term
- during four 2-hour periods each day (07:00-09:00, 10:00-12:00, 13:00-15:00, 16:00-18:00)
- at two locations (one to the north at the Wolvercote car park off Godstow Road, and one to the south at the car park off Walton Well Road)

The survey questionnaire asked a series of 11 questions:

About you:

- Question 1: *How many adults, children and dogs make up your group?*
- Question 2: *Which postcode have you travelled from to visit this site?*
- Question 3: *Which best describes you?*

About today's visit:

- Question 4: *How did you get here today?*
- Question 5: *How long have you spent / will you be spending here today?*
- Question 6: *What is the main purpose of your visit today?*

About other visits:

- Question 7: *How often do you visit this site?*
- Question 8: *Do you tend to visit this site at a certain time of day?*
- Question 9: *What time of year do you visit this site?*
- Question 10: *Aside from this location do you visit any other places for similar purposes?*
- Question 11: *What facilities do you think are important to your enjoyment of open spaces in the Oxford area?*

RESULTS

575 interviews were conducted, comprising a total of 933 visitors. The visitor log recorded a further 410 visitors who were not interviewed. As a total, 1343 people visited the site during the survey.

Question 1:

Size of group as percentage of all interviews (575); and percentage of all interviews (575) with 1 or more dogs

	1 person	2 people	3 people	4 people	5+ people
TOTAL	60%	29%	5%	4%	2%

with dog
47%

Age of visitors, as percentage of responses given (933 visitors)

	Under 18	18-40	41-65	65+
TOTAL	13.2%	38.2%	32.4%	16.3%

Question 2:

Postcode of visitor origin, as percentage of responses given (568)

Oxfordshire	%	Outside Oxfordshire	%	Outside U.K.	%
OX1	11.6	HA4	0.2	Germany	0.2
OX2	55.1	BH8	0.2	Indonesia	0.2
OX3	4.0	TN30	0.2	Italy	0.2
OX4	5.8	DY13	0.2	New Zealand	0.2
OX5	6.3	HP18	0.7	South America	0.2
OX7	0.2	BN16	0.2	Spain	0.2
OX9	0.2	NW3	0.2	Sweden	0.2
OX11	0.2	HG4	0.2	Switzerland	0.2
OX12	0.7	SN7	0.2	USA	0.9
OX13	1.2	W2	0.2	TOTAL	2.3
OX14	0.7	IP12	0.2		
OX15	0.2	NN13	0.2		
OX17	0.5	B90	0.2		
OX18	0.5	CB22	0.2		
OX20	0.4	SW19	0.2		
OX25	0.5	RH15	0.2		
OX26	1.1	NW9	0.2		
OX27	0.4	HA8	0.2		
OX28	0.4	PL6	0.2		
OX29	0.5	EH10	0.2		
OX33	0.4	SM8	0.2		
OX44	0.4	GL56	0.2		
TOTAL	91.2	CO4	0.2		
		W3	0.2		
		N13	0.2		
		SN6	0.4		
		PO18	0.2		
		NN4	0.2		
		SM6	0.2		
		N4	0.2		
		GL52	0.2		
		RG4	0.2		
		SE3	0.2		
		TOTAL	6.5		

Question 3:

Resident or visitor, as percentage of responses given (927)

	Permanent resident of Oxford	Temporary resident of Oxford	Resident elsewhere in Oxfordshire	Visitor / holiday maker
TOTAL	66.5%	8.5%	12.2%	12.8%

Question 4:

Mode of travel to arrive at site, as percentage of responses given (913)

	Walk	Cycle	Bus	Car	Other
TOTAL	43.3%	4.9%	1.4%	43%	7.3%

Question 5:

Length of visit, as percentage of responses given (919)

	Less than 1 hour	1-2 hours	2-3 hours
Total	61.8%	33.5%	4.7%

Question 6:

Purpose of visit, as percentage of responses given (1007)

	Dog walking	Walking	Jogging / running	Cycling	Family outing	Nature	Other
TOTAL	40.3%	35.3%	8.9%	2.6%	3.2%	2.9%	6.9%

Question 7:

Frequency of visit(s), as percentage of responses given (845)

	Daily	Weekly	Monthly	Occasionally	N/A
TOTAL	23.8%	55.7%	9.5%	6.5%	4.5%

Question 8:

Time(s) of visit(s), as percentage of responses given (1121)

	Before 09:00	09:00-12:00	12:00-14:00	14:00-16:00	After 16:00	Don't know / first visit
TOTAL	15.9%	23.3%	17.6%	22.0%	17.8%	3.4%

Question 9:

Season(s) of visit(s), as percentage of responses given

	Year-round	Spring	Summer	Autumn	Winter
TOTAL	79.7%	3.9%	5.6%	7.7%	3.1%

Question 10:

Other site(s)/area(s) visited for similar purpose(s), and number of independent mentions (570)

Site / Area	# of mentions	Site / Area	# of mentions
University Parks	179	Kidlington	2
Shotover	62	Other nature reserves	2
Canal Towpath	51	Otmoor	2
Cutteslowe Park	48	Sunnymead	2
Christchurch Meadow	38	Trap Grounds	2
Wytham Woods	27	Wolfson College	2
Thames Path	18	Bagley Woods	1
Blenheim Palace	16	Berinsfield	1
South Park	15	Bernwood Forest	1
Stratfield Brake	10	Bicester	1
Boars Hill	6	Botley Road Nature Reserve	1
Burgess Field	6	Brasenose Woods	1
Hinksey Park	6	Donnington Bridge	1
Wolvercote	6	Grandpont Nature Reserve	1
Florence Park	5	Godstow	1
Headington	5	Hog Acres Common	1
Marston Meadows	5	Islip	1
Aristotle Park	4	Monk's Way	1
Binsey	4	Nuneham Courtenay	1
Botanical Gardens	4	Oriel College Fields	1
Farmoor Reservoir	4	Osney	1
Iffley	4	Sandford Lock	1
Thrupp	4	South Oxfordshire	1
Eynsham	3	The Kidneys	1
Other parks in Oxford	3	Wantage	1
Abbey Meadows	2	Willow Walk	1
Cumnor	2	Wittenham Clumps	1

Question 11:
Rating of importance of individual factors in enjoyment of open spaces in Oxford area, as percentage of responses given (V : very important / Q : quite important / N : not important)

	Park furniture			Litter bins			Dog bins		
	V	Q	N	V	Q	N	V	Q	N
TOTAL	20.2%	26.4%	53.4%	67.4%	18.8%	13.8%	71.2%	7.4%	21.4%

	Information boards			Car parking			Cycle parking		
	V	Q	N	V	Q	N	V	Q	N
TOTAL	21.8%	42.0%	36.3%	45.4%	8.3%	46.3%	28.7%	21.6%	49.7%

	Toilets			Signposted paths			Well maintained paths		
	V	Q	N	V	Q	N	V	Q	N

TOTAL	39.9%	20.9%	39.2%	28.3%	31.6%	40.1%	43.9%	33.7%	22.5%

	Length / variety of paths			Accessibility			Views		
	V	Q	N	V	Q	N	V	Q	N
TOTAL	38.7%	35.9%	25.4%	27.8%	17.8%	54.4%	91.5%	6.2%	2.2%

	Wildlife / biodiversity			Habitat variety			Access to water		
	V	Q	N	V	Q	N	V	Q	N
TOTAL	92.6%	5.7%	1.7%	88.8%	9.2%	2.1%	77.0%	12.8%	10.2%

	Feeling of safety			Quietness			Dog freedom		
	V	Q	N	V	Q	N	V	Q	N
TOTAL	77.2%	17.3%	5.5%	69.6%	25.2%	5.2%	56.1%	4.8%	39.0%

ANALYSIS

In order to interpret the survey data and project the total number of visitors to the site the following calculation was carried out. The methodology broadly follows that used by Bracknell Forest DC in the Thames Basin Heaths SPA analysis as recommended by Natural England as best practice.

	Calculation and/or reference	**Result**	
Total number of visits over survey period	Taken from survey data	A	1,343
Percentage of visits over survey period from within postcode sectors OX1 and OX2	Taken from survey data	B	66.7%
Projected total number of visits, per annum	See Table 1 below	C	429,420
Projected total number of visits from within postcode sectors OX1 and OX2, per annum	(C÷100)xB	D	286,423
Population of postcode sectors OX1 and OX2	Taken from 2011 Census	E	65,318
Projected visits per head of OX1 and OX2 population, per annum	D÷E	F	4.4
Projected future population arising from new potential development	See Table 2 below	G	3204
Projected visits per annum arising from projected future population	GxF	H	14098
% of projected future visits, as it relates to current projected total visits	(H÷C)x100	I	**3.3%**
Projected future population arising from *'in-combination impacts'*	See Table 3 below	J	4404
Projected visits per annum arising from projected future *'in-combination impacts'* population	FxJ	K	19378
% of projected *'in-combi14nation impacts'* visits, as it relates to current projected total visits	(K÷C)x100	L	**4.5%**

Table 1

Total number of visitors recorded during this survey	1343
Number of surveyed access points	2
Mean number of visitors per surveyed access point	671
Number of hours of surveying per access point	48
Mean number of visitors per surveyed access point, per hour	14
Total active hours in day (06:00-20:00)	14
Projected mean number of visitors per surveyed access point, per day	196
Projected mean number of visitors per surveyed access point, per year	71540
Total number of access points to the SAC	6
Projected total number of visitors per year to the SAC	**429420**

Table 2 – LP2036 'alone' impacts

Site	Number of units	Number of residents
Oxford Local Plan 2016-2036 (sites within 1900m of SAC)	1335	3204
Total	**1335**	**3204**

Table 3 – *'in-combination impacts'*

Site	Number of units	Number of residents
Oxford Local Plan 2016-2036	1335	3204
Northern Gateway*	500	1200
Total	**1835**	**4404**

***** The Northern Gateway Area Action Plan already includes bespoke measures within the plan to address recreational impacts

POINTS TO BE NOTED

The interviews were conducted in autumn and visitor access patterns may, as a consequence, be different when compared to the rest of the year. The surveys included the school half term period in order to reflect the difference between school holidays and term-time.

The data shows that dog walkers visit more frequently than other users, many of them walking daily on the same site. As dogs need exercising on a daily basis, the dog walkers interviewed are therefore likely to represent a relatively constant sample of visitors, and usage would be likely to be similar throughout the year. During the winter, the proportion of dog walkers to other users may well be higher as the numbers of people cycling, picnicking, etc., would likely be less.

There are 6 access points to Oxford Meadows (via the Wolvercote car park; via the right of way at the entrance to Wolvercote off Godstow Road; via Godstow Road; via the bridge at Aristotle Lane; via the bridge across the river from Binsey; and via the car park off Walton Well Road). The two survey points that were selected are both car parks and so it is possible that the survey results are slightly skewed towards arrivals by car – although this does not seem to be particularly evident for the southern access point that was surveyed.

Appendix C. Car-free dwellings in the Oxford Local Plan 2036

SP	Site Allocation	No of dwellings	Car-free dwellings	Wording of Local Plan	CPZ	400m bus stop	800m shop
SP1	West End Sites						
SP2	Osney Mead	280	280	student accommodation, employer-linked housing and market housing	c	y	y
SP3	Cowley Centre	225		residential			
SP4	Blackbird Leys Central Area	300		residential			
SP5	Summer Fld Sch Athletics Trk	120		residential dwellings			
SP6	Diamond Pl and Ewert Hse	130	130	residential, student accommodation	c	y	y
SP7	276 Banbury Road	35	35	housing, student accommodation	c	y	y
SP8	Unipart	Employment site					
SP9	Oxford Mini Plant	Employment site					
SP10	Oxfod Science Park	Employment site					
SP11	OXford Business Park	Employment site					
SP12	Sandy Lane Rec Grnd	120		residential dwellings			
SP13	Northfield Hostel	35		residential dwellings			
SP14	Edge of Playing Fields Oxford Academy	29	29	residential development for employer linked housing			
SP15	Kassam Stadium	150		residential-led development			
SP16	Knights Road	80		residential-led development			
SP17	Govt Bldngs and Harcourt Hse	70		residential, student accommodation			
SP18	Headington Hill Hall	100	100	student accommodation and employer-linked housing			
SP19	Land S of St Clements Church	50		residential dwellings			
SP20	Churchill Hospital Site	136	136	employer-linked housing student accommodation	e		
SP21	Nuffield Orthopaedic Centre	25	25	employer-linked housing	e		
SP22	Old Road Campus	Employment site					

SP	Site Allocation	No of dwellings	Car-free dwellings	Wording of Local Plan	CPZ	400m bus stop	800m shop
SP23	Warneford Hospital	75	75	residential, including employer-linked housing; student accommodation;	e		
SP24	Marston Paddock	39		residential dwellings			
SP25	St Frideswide Fm	178		residential dwellings			
SP26	Hill View Farm	110		residential dwellings			
SP27	Land W of Mill Lane	75		residential dwellings			
SP28	Park Farm	58		residential dwellings			
SP29	Pear Tree Farm	122		residential dwellings			
SP30	Land East of Redbridge P&R	162		residential dwellings			
SP31	St Catherine's College	16	16	student accommodation			
SP32	Banbury Rd University Sites	80	80	student accommodation and/or employer-linked housing			
SP33	Bertie Place Rec	30		residential development			
SP34	Canalside Land	22		residential	c	y	y
SP35	Court Place Gardens	100	100	graduate student accommodation or employer--linked housing			
SP36	Cowley Marsh Depot	80		residential dwellings			
SP37	Faculty of Music, St Aldates	8	8	residential including employer linked housing and student accommodation	c	y	y
SP38	Frmr Barns Rd East Allotments	25		residential dwellings			
SP39	Frmr Iffley Mead Playing Field	84		residential dwellings			
SP40	Grandpont Car Park	22		residential development could be in the form of employer-linked housing			
SP41	Jesus College Sports Grnd	28		residential development			
SP42	John Radcliffe Hospital Site	180	180	employer-linked housing student accommodation	e		
SP43	Land at Meadow Lane	49		residential dwellings			
SP44	Lincoln College Sports Grnd	90		residential development			

SP	Site Allocation	No of dwellings	Car-free dwellings	Wording of Local Plan	CPZ	400m bus stop	800m shop
SP45	Littlemore Park	270		Residential development			
SP46	Manor Place	40	40	student accommodation or car free residential development	CF		
SP47	Manzil Way	10	10	residential dwellings, including employer-linked housing	c	y	y
SP48	Nielsen, London Road	200		residential-led development			
SP49	Old Power Station	0		student accommodation and/or residential dwellings, including employer-linked housing	c	y	y
SP50	Oriel College Land	7		student accommodation and or residential dwellings			
SP51	Oxford Brookes, Marston Rd	59		employer-linked housing residential dwellings			
SP52	Oxford Stadium	100		residential dwellings			
SP53	OUP Sports Grnd, Jordan Hill	55		residential development			
SP54	Pullens Lane	11		residential dwellings			
SP55	Radcliffe Observatory Quarter	68	68	student accommodation and employer-linked housing			
SP56	Ruskin College campus	10	10	student accommodation and employer-linked housing			
SP57	Ruskin Field	40		residential use only, which may include employer-linked housing			
SP58	Slade House	80		residential dwellings, including employer-linked housing			
SP59	Summertown Hse, Apsley Rd	10	10	student accommodation and employer-linked housing			
SP60	Union Street Car Park	20	20	residential or student accommodation	c	y	y
SP61	Univ of Oxfd Science Area	10	10	academic institutional uses and associated research			

SP	Site Allocation	No of dwellings	Car-free dwellings	Wording of Local Plan	CPZ	400m bus stop	800m shop
SP62	Valentia Road	12	12	housing	c	y	y
SP63	West Wellington Sq	28	28	student accommodation and employer-linked housing		y	y
SP64	Wolvercote PaperMill	190		residential development			
SP65	Bayard Hill Primary School	35	35	employer-linked housing only			
SP66	William Morris Close Sports Gr	62		residential development			
Total		**4835**	**1437**				

Appendix D. Trip generation by car free development

Background

Previous modelling of air quality at Oxford Meadows SAC[47] has shown that Oxford City's Local Plan can include 6,695 homes, 'in combination' with other local authorities' plans, without affecting the integrity of the SAC in terms of air pollution. Oxford City Council is proposing to include additional car-free development in the plan, arguing that car-free development will not increase air pollution at the SAC.

What is car-free housing?

Car-free housing typically provide no parking or only very limited parking on site: perhaps disabled parking and some parking for delivery vehicles. Car-free developments are typically supported/ surrounded by Controlled Parking Zones (CPZ), and the residents of the car-free development are typically precluded from obtaining a parking permit, for instance through a contract (see Box 1) and/or a S106 obligation. It would be virtually impossible to prevent the resident of a car-free development from owning a vehicle, provided that it could be legally parked elsewhere: this could be the case where there is no CPZ, or the CPZ is not big enough.

The London boroughs, and particularly LB Camden, are front-runners in car-free housing. In some London boroughs (e.g. Camden, Tower Hamlets, Islington) most new planning permissions are for car-free development[48].

Box 1. Example of a car-free housing contract[49]

4. OBLIGATIONS OF THE OWNER AND THE LESSEE

4.1 The Owner and the Lessee hereby covenant with the Council to ensure that prior to occupying any residential unit forming part of the Development each new resident of the Development is informed by the Owner and the Lessee of the Council's policy that they shall not be entitled (unless they are the holder of a disabled persons badge issued pursuant to Section 21 of the Chronically Sick and Disabled Persons Act 1970) to be granted a Residents Parking Permit to park a vehicle in a Residents Parking Bay and will not be able to buy a contract to park within any car park owned, controlled or licensed by the Council.

4.2 The Owner and the Lessee for themselves and their successors in title to the Property hereby acknowledge that the provision in Clause 4.1 above will remain permanently.

In Oxford, this could take the form of a condition which runs with the land, e.g.:

[47] AECOM (June 2018) Vale of White Horse LPP2: Habitats Regulations Assessment incorporating appropriate assessment, http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=901511661&CODE=F7DA7FC4618427221EF01E414F33430D - see p.60.

[48] Steve Melia, email to Riki Therivel of 31 July 2018.

[49] Car Free Development, http://www.carfreehousing.org/whatis.html.

"The development hereby permitted shall not be occupied until the Order governing parking at X has been varied by the Oxfordshire County Council as highway authority to exclude the site, subject to this permission, from eligibility for resident's parking permits and residents' visitors' parking permits unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development does not generate a level of vehicular parking which would be prejudicial to highway safety, or cause parking stress in the immediate locality, in accordance with policies XYZ of the Adopted Oxford Local Plan 2036."

Trip generation by 'car free' development

Clearly 'car free' development generates some journeys. These include journeys made by:

- disabled drivers
- visitors
- tradesmen
- delivery vehicles
- moving in and out of residents
- residents who bypass the parking controls

These are now discussed in turn.

Disabled drivers. A government study of 2014[50] (the latest for which useful figures seem to exist) showed that, in 2011/12, 11.6 million people in Great Britain were disabled. Of these, 6.5 million had problems with mobility. Between 2002 and 2012, the proportion of people with mobility problems in Great Britain was between 10.5% and 11%[51]. The Scope website[52] suggests that 13.8 people in the UK were disabled in 2016/17, with mobility being the most common disability at 52%: at a UK population of 65.65 million in 2016, this suggests that 11.1% of the UK population had mobility problems two years ago. The prevalence of mobility problems rises with age[53], so this proportion can be expected to increase over time as a result of the ageing of the population. Oxford's population is generally healthier than the UK population[54], probably in part because of its high proportion of young people.

Visitors and tradesmen. The only information that is easily accessible is the experience of the London Borough of Tower Hamlets, which introduced a car-free policy in the late 1990s. It has since been fine-tuned to deal with various issues, including the difficulty of getting access for visitors and tradesmen. LB Tower Hamlets' current car-free development system[55] allows residents to:

- Purchase a temporary resident permit at £6.20/day, to allow contractors to work at the property. They must provide written proof of the work to be carried out and vehicle details.

[50] Official Statistics (2014) Disability prevalence estimates 2011/12, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/321594/disability-prevalence.pdf.

[51] I struggled to find official GB population figures for 2002-2012. To get the figures, subtract the Northern Ireland population (https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE17_POP_TOTALS.xlsx) from the UK population (https://www.ons.gov.uk/generator?uri=/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/july2017/4e7c6d81&format=csv).

[52] https://www.scope.org.uk/media/disability-facts-figures.

[53] https://www.gov.uk/government/publications/disability-facts-and-figures/disability-facts-and-figures

[54] https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/pat/6/par/E12000008/ati/101/are/E07000178.

[55] https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/Parking/parking_permits/car_free_developments.aspx.

- Purchase a maximum of three books of visitor scratchcards – 10 cards per book, £16 per book – in a rolling 12-month period.
- Retain one on-street permit if they move from an overcrowded home where they have had a parking permit for at least a year to a larger car-free home.

Delivery vehicles. There is no obvious data on this. Graham Parkhurst[56] writes about delivery vehicles at the University of the West of England:

> *"[Students] are more likely to be generating traffic through ordering Ubers or receiving deliveries from online food orders (supermarkets and fast food) and merchandise from the internet. Our campus has a 3,000-bed student village which is car free but we are about to start a scheme to manage the growing delivery traffic, so that deliveries will need to be made to a hub, with students then collecting from there, or the items being redistributed by electric cart… Given that van traffic has grown 40-50% in a decade, the delivery traffic is certainly worth considering in terms of impacts on air quality."*

Residents who bypass the parking controls. Again there does not seem to be any formal data on this. However it clearly happens to some extent. In LB Lambeth, for instance, some car-free development residents applied for parking permits and were incorrectly issued with one[57]. In Headington (east Oxford), the developer of a six-flat car-free development attempted – in the end unsuccessfully but only after a long-winded legal saga - to get the planning conditions that prohibit applying for parking permits to be revoked[58].

A 2009 study of a 120 dwelling car-free development at Slateford Green in Edinburgh had only 19 valid responses, but found that 10% of 'usual' mode of travel was by car. Slateford Green is mainly a social housing development, developed by a local housing association that had noticed that 83% of the people on its housing list did not own a car[59], and so may not be representative of conditions in Oxford.

Overall vehicle movements. The only data on the overall trip generation of 'car-free' developments seems to be tangential, i.e.:

- The TRICS traffic generation database does not have a filter for car-free housing, but does have a filter for student housing (both car-free and not). In late July 2018, based on five developments, it suggests that there are 0.25 vehicle movements per student room per day.
- The TRICS information used by Doric for the 2014 environmental statement for the West Way development, which will house 525 students on the west side of Oxford[60], shows 0.501 vehicle movements per day, out of a total of 4.49 movements per day by the students, i.e. 11% of journeys. However again the TRICS database does not differentiate between car-free development and development that permits cars. The developer (probably incorrectly) assumes no vehicle movements for the 525 rooms of student accommodation.

Conclusions about possible vehicle movements at 'car free' housing

As a conservative/precautionary measure, one could assume that:

- Disabled drivers: Given Oxford's age and health profile, up to 10% of residents of car-free non-student developments will be mobility impaired, and up to 5% of residents of car-free student accommodation will be mobility impaired. Arguably non-students with mobility impairment will make less than the average number of car journeys, as they are likely to be

[56] Professor of Sustainable Mobility and Director of the Centre for Transport & Society at UWE Bristol.
[57] https://www.lambeth.gov.uk/parking-transport-and-streets/parking/incorrectly-issued-parking-permits.
[58] https://mycouncil.oxfordshire.gov.uk/ieDecisionDetails.aspx?ID=7021.
[59] Melia, S. (2009) Potential for carfree development. PhD thesis, University of the West of England.
[60] Appendix 8.8 of RPS (2014) Botley District Centre environmental impact assessment. Botley is on the west side of Oxford, just outside the city boundary, in Vale of White Horse District Council.

older and more infirm: we assume that a non-student with mobility impairments will make 75% of the journeys taken by someone with mobility impairment, and that students with mobility impairments will make 100% of the journeys of students without mobility impairments.

- Visitors and tradesmen: Even if LB Tower Hamlet's full entitlement for visitors was taken up, this would add up to less than 0.1 journey per day, compared to 4-5 journeys in total. The impact of tradesmen would be minimal.
- Delivery vehicles: There is no information about delivery vehicles, but one could assume that 5% of a normal household's vehicle movements would be made by delivery vehicles, and this would be the same in car-free development.
- Residents who bypass parking controls: These would be one-off events, with systems improving as car-free developments become more ubiquitous and legal precedents are set.

In sum, conservatively,

	Student accommodation	Employer-linked accommodation	Other car-free accommodation
Proportion of 'non car-free' accommodation vehicle-movements generated by:			
• People with mobility impairments	5%	7.5%	7.5%
• Visitors and tradesmen	0.2%	0.2%	0.2%
• Delivery vehicles	5%	5%	5%
• Bypassing controls	0	0	0
Total proportion of non car-free accommodation vehicle-movements generated by 'car free' development - assumption	10.02%	12.52%	12.52%

Under the above assumptions, the **2000 car-free dwellings would generate very broadly the equivalent traffic as 200-250 'non car free' dwellings.**

Appendix E. Correspondence with Natural England about air quality at Oxford Meadows SAC

Date: 29 September 2017
Our ref: 219824
Your ref: Oxford City Council Oxford Local Plan 2036: Preferred Options

MMACKOWIAK@oxford.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Marek,
Planning consultation: Oxford City Council Oxford Local Plan 2036: Preferred Options

Thank you for your consultation on the above dated 01 June 2017 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Sites of Least Environmental Value
In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.

HRA screening must be available to inform selection of areas, and to demonstrate alternatives have been considered. Natural England have already met with the Council to discuss HRA screening, and can offer further advice as policy options are progressed.

The Local Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environment value is chosen for development, and to ensure the mitigation hierarchy is followed.

There are a number of sites within the preferred options which fall within the Impact Risk Zones (IRZs) for SSSIs, including Iffley Meadows, New Marston Meadows and Lye Valley (as well as the component SSSIs of the Oxford Meadows SAC). Information on any likely indirect impacts of site allocations on these sites (through hydrological changes, air pollution or recreational pressure) should inform site selection to ensure that land of least environmental value is chosen for development, and that the mitigation hierarchy is followed. It may be necessary to outline avoidance and/or mitigation measures at the plan level.

Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species; this should be taken into account in informing site selection.

Designated sites
Natural England welcome the inclusion of policy 53 which sets criteria based policies to ensure the

protection of designated biodiversity and geological sites, distinguishing between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs),and European sites (such as Oxford Meadows Special Areas of Conservation)should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

Oxford Meadows SAC
Natural England have met with the Council to discuss screening under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended). It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect arising from recreational pressure, hydrological changes or air pollution on the integrity of Oxford Meadows SAC.

We welcome preferred option 41 (C) which recognises the need to protect groundwater feeding the SAC. We recommend that the policy should be informed by the outcomes of the HRA, and consider it suitable that it should apply to all developments on or near the north Oxford gravel terrace.

Once allocations and policies have been selected, traffic modelling will be needed to determine whether traffic flows on roads within 200m of Oxford Meadows SAC will be increased by more than 1000AADT by the Local Plan, the level at which we advise that there are likely significa nt effects on the SAC, if this were the case appropriate assessment would be needed to understand whether there would be an adverse effect on the integrity of the SAC.

It is understood that visitor survey work is to be undertaken at the Oxford Meadows SAC to inform the HRA; following HRA work it may be necessary to outline avoidance or mitigation measures, such as provision of additional accessible natural greenspace, at the plan level.

It may also be necessary for the Plan to provide policies for strategic or cross boundary approaches in relation to Oxford Meadows SAC; an in-combination assessment of impacts on air quality at the SAC from traffic arising from surrounding authorities will be needed to look at whether the combined effect of development across the authorities would increase traffic on roads within 200m of Oxford Meadows SAC by 1000AADT or more, if this is the case appropriate assessment will be needed.

Lye Valley SSSI
Natural England welcome recognition of the need to protect the hydrology of the Lye Valley SSSI, both in terms of ground and surface water flows, in part B of Option 41. As well as avoiding adverse impacts, we advise that the policy seeks to improve groundwater recharge and management of surface water flows. This is particularly relevant in relation to development on brownfield sites in the area. Reference should also be made to ensuring good water quality.

Natural England advise that the policy should apply to a defined area, as opposed to nearby allocated sites alone. In order to define an area to which the policy should apply, further work will be needed to refine the boundaries of the hydrological catchment of the fen.

Additionally, we advise that there should be policy in place to ensure that any new development coming forward does not direct surface run-off into the drainage system which discharges into the Lye Valley, this currently causes problems with erosion of peat during fast flows.

Priority habitats, ecological networks and priority and/or legally protected species populations
Natural England welcome the inclusion of policy 53 which recognises the need to protect a network supporting biodiversity through the city. We would advise specifically referencing inclusion of priority habitats and species (those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP) as part of this network. Further information is available here: Habitats and species of principal importance in England).

Ancient woodland and veteran trees are found within the Oxford City boundary, these are irreplaceable habitats; there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.

We would advise that policy is included to deliver biodiversity enhancements to provide a net gain in biodiversity. We note reference to use of a biodiversity calculator to demonstrate net gain within the preferred option 53B and suggest clarification is provided as to when application of the calculator will be required. We would recommend consideration of a policy that requires all larger developments to demonstrate a net gain in biodiversity. In Oxfordshire the Conservation Target Area approach provides a useful blueprint for biodiversity enhancement, further information is available at https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/ctas-and-planning/

Green Infrastructure
Natural England generally welcome the approach to Green Infrastructure in the preferred policy options which seek to create a green infrastructure designation, provide a net gain in green infrastructure from larger developments and improve public access, require developers to demonstrate high quality green infrastructure provision and promote use of green/brown roofs. However, given that the preferred option 49 removes the previous target level of green space for the city, Natural England advise that it should be clear that there is a presumption against loss of green space, unless there are exceptional circumstances, and a net gain in green infrastructure can be achieved.

Soils
The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 112 to safeguard 'best and most versatile' agricultural land.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Rebecca Micklem on 020822 57686. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Rebecca Micklem
Sustainable Development
Thames Team

From: Micklem, Rebecca (NE) [mailto:Rebecca.Micklem@naturalengland.org.uk]
Sent: 04 May 2018 16:37
To: HARRISON Sarah B.
Cc: FORD Amanda; WYATT Richard
Subject: RE: Friends of Lye Valley response and sits in vicinity of Lye Valley

Dear All,

…Following our site visit to Oxford Meadows the other week, I have been in discussion with a couple of our national air quality advisors; it still seems that the monitoring data from the Oxford-Bicester TWA order would certainly be useful, so if it would be great if you are able to track this down. I will get back to you as soon as possible to confirm next steps in terms of the HRA.

Kind regards,

Beccy
Rebecca Micklem
Lead Adviser
Sustainable Development
Thames Team

From: WYATT Richard [mailto:RWYATT@oxford.gov.uk]
Sent: 16 May 2018 10:31
To: Micklem, Rebecca (NE) <Rebecca.Micklem@naturalengland.org.uk>; HARRISON Sarah B. <SHARRISON@oxford.gov.uk>
Cc: FORD Amanda <AFORD@oxford.gov.uk>
Subject: RE: Friends of Lye Valley response and sits in vicinity of Lye Valley

Dear Becky,
…

Finally, can you let us have your thoughts on air quality at the Oxford Meadow and how we should proceed.

Kind regards,
Richard
Richard Wyatt| Senior Planner | Planning Policy I Planning Sustainable Development and Regulatory Services | Oxford City Council

From: Micklem, Rebecca (NE) [mailto:Rebecca.Micklem@naturalengland.org.uk]
Sent: 25 May 2018 11:37
To: WYATT Richard
Subject: RE: Friends of Lye Valley response and sits in vicinity of Lye Valley

Dear Richard,

…In terms of Oxford Meadows, as we talked about on site, the fact that the 1000AADT threshold will be exceeded by traffic generated by the plan means that we advise that there could be Likely Significant Effects on the SAC from air pollution, and that further assessment is needed to demonstrate whether there would be an adverse effect on the integrity of the site, either alone or in-combination with other plans or projects. Therefore, we advise that air quality modelling is undertaken to determine what contribution the additional traffic would make in relation to critical levels of pollutants at the site and whether that is likely to result in an adverse effect.

As you are aware from our previous conversations, following the Wealden Judgement, clarification has been provided in terms of in-combination assessment of air pollution from road traffic. This means that, even where plans can conclude no Likely Significant Effect alone, they still need to include an in-combination assessment with other plans or projects. Cherwell DC and Vale of the White Horse have both been looking at how to address this at Oxford Meadows and you may find it useful to consider their most up-to-date Appropriate Assessments when they become available.

I also spoke to Ricki on site about the recent Sweetman II ECJ Judgement, which could be relevant should you need to consider mitigation in relation to Oxford Meadows (in very brief summary, the judgement was that avoidance or mitigation could not be considered at HRA screening stage in order to conclude no Likely Significant Effects, and that if such measures would be required then Appropriate Assessment is needed).

I hope that this is useful,

Kind regards,

Beccy
Rebecca Micklem
Lead Adviser
Sustainable Development
Thames Team

5 July 2018

Rebecca Micklem
Lead Adviser
Sustainable Development
Thames Team

Dear Riki and Richard,

I was wondering if you had been able to track down the results of the environmental monitoring being undertaken at Oxford Meadows for the Oxford-Bicester railway improvements? I think this could provide useful information to improve our understanding of the sensitivity of the meadows to air pollution. I've been able to track down from our records the consultation on the discharge of conditions for collection of the baseline monitoring information (15/02893/CND), and assume from the notices we saw on our site visit that further data is being collected. It would be most useful to know whether that information is now available.

Kind regards,

Beccy
Rebecca Micklem

Lead Adviser

Sustainable Development
Thames Team

From: WYATT Richard [mailto:RWYATT@oxford.gov.uk]
Sent: 20 July 2018 15:43
To: Micklem, Rebecca (NE) <Rebecca.Micklem@naturalengland.org.uk>
Cc: HARRISON Sarah B. <SHARRISON@oxford.gov.uk>; Riki Therivel <levett-therivel@phonecoop.coop>
Subject: Oxford City HRA: Proposed way forward

Dear Becky,

This email sets out a proposed way forward to ensure that housing growth in Oxford City will not have an adverse impact on the Oxford Meadows SAC. It builds on the 'in-combination' HRA work undertaken by Vale of White Horse and Cherwell District Councils and provides policy mitigation which will be addressed as part of the Appropriate Assessment Stage of the HRA.

The additional combined HRA work undertaken by Vale and Cherwell District Councils considers "in-combination" effects and their likely impact on the integrity of the Oxford Meadows SAC. The Vale/ Cherwell Memo sets out the volumes of additional traffic (measured in AADT) as a result of development in Oxfordshire that would lead to a 1% increase in N Deposition at the Oxford Meadows SAC – this is threshold which would trigger further technical assessment. This is found in Appendix B to the Habitat Regulations Assessment (June 2018) submitted to the Vale of White Horse Local Plan Part 2 Examination.

Earlier this year, the County Council produced a brief note showing likely increases in traffic along the A34 and A40 for Oxford City Council. This work looked at the possible effects on Oxford Meadows SAC (in terms of additional AADT) that was likely to be generated from Oxford's growth. This work was based on the assumption that Oxford would be accommodating 6,695 dwellings from the period 2011-2031.

The Vale/ Cherwell "in-combination" assessment assumes the same level of growth for Oxford City – 6,695 dwellings (Tables 1 and 2, Appendix B). The Vale/ Cherwell "in-combination" assessment used the same assumptions as the Oxford City work and used them to generate traffic flow estimates with the Oxfordshire Strategic Traffic Model in Spring 2017. The Vale/ Cherwell work also compared the most recent traffic estimates with data published in previous HRA assessments. Clearly the Vale/ Cherwell work uses the most appropriate, "up-to-date and available" evidence.

Included as Appendix C of the HRA (June 2018) was the response from Natural England, which states:

" Thank you for providing the in-combination assessment of NOx levels… Having reviewed the data… we are satisfied with the conclusion that the changes in NOx levels arising from Vale and Cherwell Local Plans will not have an adverse effect on the integrity of Oxford Meadows SAC"

The Vale/ Cherwell "in-combination" assessment included growth the assumptions for Oxford City (6,695 dwellings to 2031), and Natural England has agreed that this level of growth can be accommodated without having an adverse effect on the integrity of the SAC. We have done some additional work to assess what, if any additional growth (in addition to the already assessed level of growth to 2031, i.e., 6,695 dwellings) can be accommodated within its Oxford's boundary to 2036 and what policies (mitigation) would need to be in place to ensure that this growth does not significantly increase AADT/ NOx levels/ N Deposition.

Due to a range of external factors outside the scope of planning, we expect any additional growth from 2031 to 2036 to be unlikely to result in significant air quality impacts at the Oxford Meadows SAC. This is because any growth at the end of the plan period will be benefitting from these external factors, which include the likely rate of take-up of electric vehicles and the diesel-scrappage scheme. However, in addition to these factors, there are several ways that the Local Plan 2036 can ensure that any increase in Oxford's housing numbers over and above the agreed 6, will not adversely

impact air at the Oxford Meadows SAC. One is to encourage the take up and use of electric vehicles by providing appropriate charging infrastructure, another is to actively encourage or require car-free developments.

The Local Plan 2036 includes a policy requiring residential development to be car-free if certain criteria are met. These criteria are currently proposed as follows. Residential development will be required to be car-free when it is located:

- Within a Controlled Parking Zone (CPZ); and
- Within 400m of a Bus Stop (frequent 15min service); and
- Within 800m of a local supermarket or equivalent facilities

It is worth noting that the City Council is looking to expand the number of CPZs in Oxford throughout the plan period. The City Council has committed £200,000 to increase the coverage of CPZs in Oxford and will work closely with the County Council to ensure delivery.

All proposed site allocations for residential developments were assessed against whether or not they met the three criteria, and, using the capacity-based assessment undertaken as part of the Housing and Employment Land Availability Assessment (HELAA). This provided estimates of numbers of units which could be delivered on individual sites.

Employer-linked housing is housing that is provided by employers on sites that they own. A similar set of criteria was applied to employer-linked housing sites and where that criteria was met, the HELAA was used to provide an indication of the amount of car-free development that could be accommodated, i.e., those sites that met the policy criteria.

Finally Student Accommodation in Oxford provided for the two Universities has had a long history of being car-free. Those sites where student accommodation has been proposed has also been factored into the proposed car-free housing growth likely over the plan period.

Summing all of the allocations together that would be required to be car-free under the policy results in over 2,100 car-free dwellings in the city. When this figure is added to the already agreed growth for Oxford (6,695) the sum total is over 8,800 houses for Oxford that can be successfully be delivered without impacting air quality at the Oxford Meadows SAC.

The City Council is confident that this approach provides a sound, evidence-based methodology to demonstrate a clear capacity-based amount of housing growth which can be successfully accommodated within the City. The proposed mitigation suggested, which will be incorporated into the Appropriate Assessment Stage of our HRA provides the policy basis to deliver a level of growth so as not to have an unacceptable impact on the integrity of the Oxford Meadows SAC.

We very much hope that you agree with our methodology and rationale in coming to a level of housing growth.

We are happy to talk through our approach further if you have any questions.

Kind regards,
Richard

Richard Wyatt| Senior Planner | Planning Policy I Planning Sustainable Development and Regulatory Services | Oxford City Council

From: Turner, Marc (NE) [mailto:Marc.Turner@naturalengland.org.uk]
Sent: 30 July 2018 15:12
To: WYATT Richard
Cc: Micklem, Rebecca (NE); Petrovic, Milena (NE)
Subject: RE: Oxford City HRA: Proposed way forward

Dear Richard,

Thank you for your email, and apologies for the delay in replying. Beccy is now on annual leave until September so replying to you has fallen to me. I'm not really sure the best approach in replying to you, I think I will start with this email summary, and suggest if you want to follow up this with telephone conversation I am available the majority of next week, except Tuesday.

- The timing of the Wealden judgement was somewhat untimely for us all in Oxfordshire. Cherwell and West Oxon were already advanced in their submission process of their latest iterations of their plans. We made a judgement to allow them to progress without following a standard post Wealden approach.
- This approach has finally been agreed and published externally by NE as of July 2018 at http://publications.naturalengland.org.uk/publication/4720542048845824
- We would prefer that you follow the approach in the above document, but I take your point regarding the Cherwell and Vale analysis that we recently accepted.
- The above approach relies much more on the modelling of AADT and then the predicted increase in Critical Loads and Levels, rather than attempting to work out how many houses will need to be built before there is an effect.
- That said, I think you are on the correct lines, in terms of the quanta of development likely to come forward in Oxford, won't be enough to generate likely significant effect. Especially if we are only talking about an increase of cars from 2031 – 2036 in this assessment, that there won't be a significant increase in dwellings and AADT.
- I think the £200k contributions to cleaner air in Oxford are in important and should form part of the evidence base for considering this issue.
- Equally strong policy provision within the Plan can be considered within the evidence base.
- I'm afraid we cannot accept entirely the rhetoric behind car free developments and student accommodation. The precautionary principle within the Habitats Regulations is such a high bar to pass. We have to assume that they will still generate vehicles on the roads. The cars may not be parked near the development, but could be parked elsewhere in Oxford outside of restrictions, and thus still partake in journeys on either the A34 or A40. I am happy to accept some level of discount, as I do feel they will reduce vehicle movements, but there is no evidence to say they will unequivocally reduce to zero.
- We are committed, outside of the Local Plan forum, to coming forward with a future proofed mechanism for Oxford Meadows SAC for air pollution, hydrology, recreational disturbance. This ties in with the recent NPPF changes and the potential move towards mandatory net gain. This could form a mitigation solution going forward, however we won't be doing anything on this in Beccy's absence. I don't have a timescale for this project.

So I suggest you take a look at the link I have attached and speak to your consultant. I'm very much of the opinion we can reach common ground on there not being an effect, but we need to see a bit more consideration and consolidation of what you have in the email below. As I say above I am around next week if you would rather talk this through. We are also keen for Oxford City to stay in touch with our proposed Oxford Meadows project going forward.

Kind Regards

Marc
Marc Turner – Senior Planning Adviser
Thames Team
Natural England

From: WYATT Richard [mailto:RWYATT@oxford.gov.uk]
Sent: 03 August 2018 15:37
To: Turner, Marc (NE) <Marc.Turner@naturalengland.org.uk>
Cc: Micklem, Rebecca (NE) <Rebecca.Micklem@naturalengland.org.uk>; Petrovic, Milena (NE) <Milena.Petrovic@naturalengland.org.uk>; HARRISON Sarah B. <SHARRISON@oxford.gov.uk>; Riki Therivel <levett-therivel@phonecoop.coop>
Subject: RE: Oxford City HRA: Proposed way forward

Dear Marc,

Thanks for your email. We are pleased that you consider that a position of common ground can be reached. We have been working with our consultant – Riki Therivel – to find a way forward to address the issues that you outline around our previous car-free development rhetoric. This email seeks to find a way to quantify the amount of non-car housing that could reasonably be shown to generate the same amount of traffic as its car-free housing equivalent.

Before I get into the figures I wanted to provide a little more information about the City Council's ambition for city-wide controlled parking zones. The City and County Councils are working together to deliver controlled parking zones throughout Oxford. As previously mentioned the City Council has provisionally earmarked £200,000 of CIL funds for this programme. This is on top of £661,000 which has been identified by the County Council - £250,000 from its own capital programme and £411,000 from held or secured planning (S106) or highways (S278) agreements linked to new developments. The HRA will include more details on the city and county's vision for a city-wide CPZ but for now please be re-assured that by 2031 it is highly likely that the city-wide CPZ ambitions will have been completed. The funds already allocated to this project should give you some re-assurance that it is moving forward with further contributions likely during the plan period.

In terms of the more technical information, we have been working on how best to present the relationship between car-free housing and the equivalent number of non-car free housing that would generate the same amount of traffic.

The starting point was the number of car-free houses in the city. We wanted to find out an equivalent amount of non-car-free houses that we could be confident would generate the same amount of traffic as the car-free equivalent. In order to do this the following conservative/ precautionary assumptions were used.

- ☐ *Disabled drivers:* Given Oxford's age and health profile, up to 10% of residents of car-free non-student developments will be mobility impaired, and up to 5% of residents of car-free student accommodation will be mobility impaired. Arguably non-students with mobility impairment will make less than the average number of car journeys, as they are likely to be older and more infirm: we assume that a non-student with mobility impairments will make 75% of the journeys taken by someone with mobility impairment, and that students with mobility impairments will make 100% of the journeys of students without mobility impairments.
- ☐ *Visitors and tradesmen:* Even if LB Tower Hamlet's full entitlement for visitors was taken up, this would add up to less than 0.1 journey per day, compared to 4-5 journeys in total. The impact of tradesmen would be minimal.
- ☐ *Delivery vehicles:* There is no information about delivery vehicles, but one could assume that 5% of a normal household's vehicle movements would be made by delivery vehicles, and this would be the same in car-free development.

- ☐ *Residents who bypass parking controls:* These would be one-off events, with systems improving as car-free developments become more ubiquitous and legal precedents are set.

The following table sets out the relationship between of 'car-free' housing vehicle movements and those generated by an equivalent non-car-free amount of dwellings..

	Student accommodation	Employer-linked accommodation	Other car-free accommodation
Proportion of 'non car-free' accommodation vehicle-movements generated by:			
☐ People with mobility impairments	5%	7.5%	7.5%
☐ Visitors and tradesmen	0.2%	0.2%	0.2%
☐ Delivery vehicles	5%	5%	5%
☐ Bypassing controls	0	0	0
Total proportion of non car-free accommodation vehicle-movements generated by 'car free' development - assumption	10.02%	12.52%	12.52%
Amount of this accommodation expected	350	1221	522
Amount of 'non car-free' equivalent vehicle movements generated by 'car free' development under above assumptions	35	153	65

Under the above assumptions, **2093 car-free dwellings would generate very broadly the equivalent traffic as 253 'non car free' dwellings.**
The Local Plan proposes 8500 new homes. If 6407 of these are not car-free and 2093 are car-free, together **the 8500 homes in the plan would generate the equivalent traffic movements of 6660 non car-free homes.** Even if the proportion of e.g. delivery journeys was slightly higher, say 6.5%, this would still mean that the proposed level of housing generated no more than the 6695 home-equivalent assumed in the Vale of White Horse HRA.

If you need anything further, please let me know. We're very keen to resolve this and be able to move forward to a position of common ground.

Kind regards,
Richard
Richard Wyatt| Senior Planner | Planning Policy I Planning Sustainable Development and Regulatory Services | Oxford City Council

From: Turner, Marc (NE) [mailto:Marc.Turner@naturalengland.org.uk]
Sent: 08 August 2018 09:46
To: WYATT Richard
Cc: Micklem, Rebecca (NE); Petrovic, Milena (NE); HARRISON Sarah B.
Subject: RE: Oxford City HRA: Proposed way forward

Dear Richard,

Thank you for your reply. I will need to check this approach with our National Air Pollution Specialist, as it is not an approach we have accepted previously. She is unfortunately on leave this week, and then I am on leave the following two weeks.

I will copy Milena, and our Team Leader for Oxfordshire, Charlotte Frizzell in to my email to our Specialist. If she replies whilst I am away, you should still be able to get a more expedient response, than awaiting my return.

Kind Regards

Marc
Marc Turner – Senior Planning Adviser
Thames Team
Natural England

From: HARRISON Sarah B. [mailto:SHARRISON@oxford.gov.uk]
Sent: 08 August 2018 10:13
To: Turner, Marc (NE) <Marc.Turner@naturalengland.org.uk>; WYATT Richard <RWYATT@oxford.gov.uk>
Cc: Micklem, Rebecca (NE) <Rebecca.Micklem@naturalengland.org.uk>; Petrovic, Milena (NE) <Milena.Petrovic@naturalengland.org.uk>
Subject: RE: Oxford City HRA: Proposed way forward

Dear Marc,

Many thanks for your response and for checking this with your National Air Pollution Specialist. Is there any further commitment or information we could provide that might help you? Is it the car free approach that has not been accepted previously?

We have now provided data to show how many car trips car-free development might reasonably be expected to generate. We will have a strong policy requiring car free development. I think that we have actually significantly underestimated the amount of car-free development that will come forward, because a substantial part of the city is already CPZ and very accessible. Because of the precautionary principle we have been cautious in estimates of total car free, and have now factored in potential car trips generated from car free.

In terms for student accommodation (which will be a very small part of our housing delivery anyway, as that is very restricted) all students have for many years signed undertakings not to bring cars to Oxford, and the universities monitor and enforce this. There might be instances where they do manage to have a car (although it is not a necessary or attractive proposition for a student in Oxford anyway), but now we have made some allowance for car trips from car-free development anyway.

Many thanks for taking time to consider Oxford's approach. I would just like to emphasise again that Oxford is a particularly compact and accessible city, and we have a commitment and will have a strong policy that minimises parking (for all types of development).

Kind regards,

Sarah
Sarah Harrison
Team Leader| Planning Policy | Planning, Sustainable Development and Regulatory | Oxford City Council

From: Turner, Marc (NE) [mailto:Marc.Turner@naturalengland.org.uk]
Sent: 08 August 2018 10:35
To: HARRISON Sarah B.; WYATT Richard
Subject: RE: Oxford City HRA: Proposed way forward

Hi Sarah,

It is the car free implications that I am checking specifically. So I don't think there is much else you can provide at this juncture I am afraid. Thanks for the clarification.

Kind Regards

Marc
Marc Turner – Senior Planning Adviser
Thames Team
Natural England

From: WYATT Richard [mailto:RWYATT@oxford.gov.uk]
Sent: 05 September 2018 13:08
To: Turner, Marc (NE) <Marc.Turner@naturalengland.org.uk>; HARRISON Sarah B. <SHARRISON@oxford.gov.uk>
Subject: RE: Oxford City HRA: Proposed way forward

Hi Marc,

Any news from your air quality specialist. Our deadlines are approaching rather rapidly and we would very much value Natural England's comments on our proposed approach.

Kind regards,
Richard
Richard Wyatt| Senior Planner | Planning Policy I Planning Sustainable Development and Regulatory Services | Oxford City Council

From: Turner, Marc (NE) [mailto:Marc.Turner@naturalengland.org.uk]
Sent: 06 September 2018 11:17
To: WYATT Richard; HARRISON Sarah B.
Subject: RE: Oxford City HRA: Proposed way forward

Hi Richard,

No news as yet, but there has been a new recent ECJ opinion, which might be quite relevant to this question. We have only just received it and won't have any guidance on it for some while, but it does look at the question of long term trends in air pollution modelling and mitigation.

I suggest you take a look at this and how it fits with you approach.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CC0293

Kind Regards

Marc

Marc Turner – Senior Planning Adviser
Thames Team
Natural England

Appendix 2iii

www.oxford.gov.uk

OXFORD CITY COUNCIL

Infrastructure Delivery Plan

October 2018

Building a world-class city for everyone

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1. Introduction

Purpose of the IDP

1.1 This Infrastructure Delivery Plan (IDP) has been produced to support the delivery of the emerging Oxford Local Plan 2036. Detail of the infrastructure identified by the Council and other service providers are set out in Appendix 1.

1.2 The IDP identifies existing deficiencies and surpluses and answers the following questions:

- What is required for the future?
- When will it be needed?
- Who is responsible for providing it?
- How will it be funded?
- Are there any funding gaps and if so, how will they be bridged?

1.3 The IDP assesses the potential risks of infrastructure not being delivered in a timely manner to support development. As infrastructure and services are provided by different organisations it is necessary to have full regard to the investment strategies and infrastructure programmes of other relevant organisations operating in the area.

1.4 The term 'infrastructure' is used in its broadest sense to mean any service or facility that supports development. As a minimum, it includes the physical, social and green infrastructure set out below. This IDP focuses on the likely costs and potential funding mechanisms for those items of infrastructure that are considered to be "critical" to delivering the development necessary to implement the Local Plan 2036.

Physical Infrastructure includes:

- Transport: road, rail, bus, pedestrian, cycle, travel management, car parking;
- Water and Drainage: water supply, wastewater, drainage, flood risk;
- Energy: gas and electricity provision;
- Waste: collection and disposal; and
- Information and Communications Technology: Digital infrastructure, SMART technologies, broadband.

Social Infrastructure includes:

- Affordable Housing;
- Education: nursery and pre-school/ primary/ secondary/ tertiary/ adult education;
- Health: hospitals/ health centres/ GP surgeries/ public health;
- Community services/ facilities: libraries, community centres, youth provision, social services, children's centres, special educational needs, facilities for the disabled, police, fire and rescue service, ambulance service, cemeteries and crematoria, places of worship, post offices; and
- Culture and Leisure: museums/ galleries, theatres, events venues, cinemas, sports centres, swimming pools, children's play areas, pitches and courts

Green Infrastructure includes:

- Open Space – parks, accessible green space, biodiversity and allotments.

1.5 The City Council's role in facilitating and securing the delivery of the infrastructure requirements identified in this IDP is likely to include:

- The delivery of infrastructure through the pooling of Community Infrastructure Levy[1] (CIL) received from new development;
- Amending as necessary the list of infrastructure (the Regulation 123 List) the Council intends to fund wholly or partly through the CIL;
- Indirect funding of infrastructure through enabling private sector investment, through the negotiation of planning obligations (S106 agreements) in the context of the determination of planning applications; and
- Indirect funding by influencing third party public sector investment in statutory services which impact on spatial policies (such as schools, adults and children's services and public transport).
- The delivery of infrastructure through the application of planning policies (e.g., by requiring the provision of the necessary infrastructure that is phased in conjunction with development and by allocating any necessary sites for infrastructure provision);

1.6 The infrastructure requirements set out in this IDP are based on technical and other assessments undertaken at a certain point in time. The IDP is a 'living document' and will be regularly updated and monitored as more information becomes available or as new infrastructure schemes are identified.

[1] The Community Infrastructure Levy (CIL) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals, and other health and social care facilities, park improvements, green spaces and leisure centres.

2. Policy Background and Studies

2.1 This IDP and the Schedule at Appendix 1 have been prepared in accordance with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) alongside relevant cross boundary work and local policy. Specific steps have been undertaken which were considered to be relevant to the scale and range of development within the City. In addition, where recent studies have been undertaken relating to infrastructure requirements the relevant key findings of these studies have been used to inform this IDP.

The National Planning Policy Framework (NPPF)

(https://www.gov.uk/government/publications/national-planning-policy-framework--2)

2.2 The NPPF (2018) integrates infrastructure provision into the over-arching economic objective for achieving sustainable development. Paragraph 8 sets out the national economic objective of sustainable development as follows:

"To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available at the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"

2.3 Paragraph 20 considers that infrastructure should be set out in strategic policies and allocations. Paragraph 20 states:

"The strategic policies required for the area of each local planning authority should include those policies, and strategic allocations, necessary to provide:

d) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management and the provision of minerals and energy (including heat);

e) community facilities (such as health, education and cultural infrastructure) and;

f) climate change mitigation and adaptation, and conservation and enhancement of the natural and built environment, including landscape and green infrastructure.

2.4 The NPPF considers that planning policies should seek to address the lack of infrastructure as a potential barrier to growth and investment and highlights the importance of working with neighbouring authorities to develop cross-boundary infrastructure.

Planning Practice Guidance

https://www.gov.uk/government/collections/planning-practice-guidance

2.5 More guidance is provided by the national Planning Practice Guidance with section 12-018[2] (published March 2014) being particularly relevant. Key issues raised include that as part of the Local Plan process, planning authorities should identify *"what infrastructure is required and how it can be funded and brought on stream at the appropriate time whilst ensuring that the requirements of the plan as a whole will not prejudice the viability of development".* The PPG emphasises early discussions with infrastructure providers and the Local Enterprise Partnership in considering strategic challenges.

2.6 According to the PPG, an IDP should seek to make clear what infrastructure is provided, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development.

2.7 The PPG now provides advice on the topic of Viability Assessments and how infrastructure requirements should be handled within this context. The Viability section of the PPG has been updated following the publication of the 2018 NPPF to reflect these changes[3].

Oxfordshire Infrastructure Strategy (OxIS)

https://www.oxfordshiregrowthboard.org/projects/oxis-stage-2/

2.8 A county-wide infrastructure strategy was commissioned by the Oxfordshire Growth Board "to better understand the scale of the infrastructure challenge" facing the county The aim of the strategy was to ensure that the appropriate infrastructure is in place to support the additional 267,000 people predicted to be living in Oxfordshire by 2040.

2.9 The OxIS Report has been prepared by AECOM as is based on an analysis of available evidence provided by local authorities throughout Oxfordshire and augmented by a desk-based assessment of additional published information. Stage 1 of the strategy presented an overview of growth patterns and the infrastructure needed to support such growth, their costs, how much funding has already been secured, or is expected towards their delivery and the funding gap for the period up to 2040.

2.10 The Stage 2 Report (published in September 2017) highlights the key projects and provides an overview of the costs envisaged to deliver the various elements of the strategy. The Oxford element of the strategy consists of the local infrastructure required as well as a summary of the costs of that infrastructure.

[2] https://www.gov.uk/guidance/local-plans--2
[3] https://www.gov.uk/guidance/viability

2.11 The summary costs for Oxford's local infrastructure, according to the OxIS study is set out below:

Costs	£237,170,000
Known Funding	£59,010,000
Funding Gap	£178,160,000

2.12 It is worth noting that the OxIS Report provides a "snap-shot" reflecting the position at the time of its production.

The Oxford Local Plan 2036

https://www.oxford.gov.uk/info/20067/planning_policy/743/the_local_plan

2.13 The Oxford Local Plan 2036 Proposed Submission document sets out the planning framework for Oxford City to 2036. Chapter 1 sets out the Vision, Strategy and Objectives. One of the objectives of the plan is:

"To ensure that development is supported by the appropriate infrastructure and community facilities".

2.14 Demands for infrastructure can arise from many sources, which include deficiencies or weaknesses in existing infrastructure. General population growth can also be a factor which increases pressure on infrastructure. Of particular importance for this IDP is the fact that new infrastructure may be specifically required as a consequence of the development proposals contained in the Oxford Local Plan 2036. In particular, Oxford is not seeking to increase the number of employment land allocations, rather to intensify and modernise their uses where appropriate. The plan makes provision for 8,500 new homes throughout the plan period to 2036 (425/year).

2.15 The IDP relates to a number of polices throughout the Oxford Local Plan 2036 however it particularly relates to policies *V7 Infrastructure and Cultural and Community Facilities* and *V8 Utilities*

2.16 Policy V7 Infrastructure and Cultural and Community Facilities, provides protection for existing cultural and community facilities and supports their development in specified locations. In particular it states that:

The City Council will work with service providers to improve access to social and community infrastructure and in particular from new development.

2.17 Policy V8 Utilities states:

Planning applications (except householder applications) must be supported by information demonstrating that the proposed developer has explored existing capacity (and opportunities for extending it) with the appropriate utilities providers. Planning permission will not be granted

where there is insufficient evidence on utilities capacity to support the development.

Planning permission will only be granted for B1/B2 employment over 1000sqm where it makes provision for high quality digital facilities. The City Council will work with providers to deliver the expansion of high quality digital infrastructure throughout Oxford.

The Community Infrastructure Levy (CIL)

2.18 CIL came into force in April 2010 through the Community Infrastructure Levy Regulations 2010. The levy is paid by developers to the City Council according to the Charging Schedule[4]. At the time of writing the most current version of the Charging Schedule is the version adopted in 2013. An updated Charging Schedule will be produced to support the emerging Local Plan 2036. CIL income can only be spent on infrastructure set out in the Regulation 123 List. The IDP will indicate specific projects that are in need of funding to support the delivery of the emerging Local Plan 2036.

Best Practice Guidance

2.19 Best practice guidance and further guidelines on infrastructure planning and implementation of CIL have been published by the Planning Advisory Service (PAS)[5], and Planning Officers Society (POS)[6] [7]. Importantly PAS highlights the fact that an IDP is not something planners can do alone. Planners need to draw in and influence the investments, strategies and investment programmes within the local authority and other organisations in its area, wherever possible. Although this guidance is a little dated (especially in terms of detail), the City Council has had regard to these publications in the preparation of this IDP.

Oxfordshire Local Enterprise Partnership (OxLEP)
https://www.oxfordshirelep.com/

2.20 The Oxfordshire Local Enterprise Partnership (OxLEP) is one of 39 LEPs across the country. Established in 2011, the LEP has made considerable progress in strengthening the Oxfordshire economy. OxLE has created a

[4] Oxford City Council's CIL Charging Schedule can be found online at: www.oxford.gov.uk/CIL
[5] A Steps Approach to Infrastructure Planning and Delivery (PAS, June 2009) https://www.local.gov.uk/sites/default/files/documents/A_steps_approach_to_infrastructure_planning_and_delivery_June_2009.pdf
[6] Infrastructure Planning and the Community Infrastructure Levy (POS, 2011) http://www.planningofficers.org.uk/downloads/pdf/POS%20advice%20note_CIL%20and%20Infrastructure%20Planning_October%202011_V2.pdf
[7] Section 106 Obligations and the Community Infrastructure Levy (POS, 2015) http://www.planningofficers.org.uk/downloads/pdf/POS%20Advice%20Note%20S106%20and%20CIL%20February%202015.pdf

strong partnership between business, Government and local authorities across the county.

2.21 The purpose of Local Enterprise Partnerships is to "provide the clear vision and strategic leadership to drive sustainable private sector-led growth and job creation in their area" (Local Growth: Realising Every Place's Potential, BIS, 2010). To do this LEPs are expected to provided and maintain an up-to-date Strategic Economic Plan (SEP). The OxLEP SEP has various purposes, including steering bids for funding for economic development, skills and infrastructure projects. Oxfordshire benefits from strong economic growth, therefore the SEP focuses on supporting and managing the economic growth to ensure sustainable and inclusive outcomes.

2.22 OxLEP has secured in excess of £600 million-worth of central government funds for the Oxfordshire economy, which includes £142.5 million through the Local Growth Fund 1,2 and 3 for projects including Oxfordshire Flood Risk Management Scheme and the Oxpens development programme in Oxford City Centre.

Housing and Growth Deal for Oxfordshire (2018)

https://www.gov.uk/government/publications/oxfordshire-housing-deal

2.23 The Government has agreed a programme of infrastructure, housing, business investment and development in the Cambridge-Milton Keynes-Oxford corridor. The Oxfordshire Housing and Growth Deal, was signed in 2018 by all parties and commits to the delivery of 100,000 homes by 2031. These homes are already allocated in Local Plans for the Oxfordshire Districts. Additionally the deal commits to the delivery of a Joint Statutory Spatial Plan for the period up to 2050. This The Housing and Growth Deal is supported by Government investment of up to £215million for infrastructure, affordable housing and local capacity.

2.24 £150m of investment is for infrastructure across Oxfordshire, including road and rail. The Oxfordshire Infrastructure Strategy (OxIS) will be used to inform where funding will be spent to unlock growth in the county of Oxfordshire so it is likely that a proportion will be spent on projects improving Oxford's infrastructure.

Oxford-Cambridge Expressway

https://www.gov.uk/government/collections/road-investment-strategy-post-2020#research-phase:-oxford-to-cambridge-expressway

2.25 In March 2016, the National Infrastructure Commission was asked to consider how to maximise the potential of the Cambridge-Milton Keynes-Oxford corridor as a single knowledge intensive cluster that competes on a global stage, protecting the area's high quality environment, and securing the homes and jobs that the area needs. Central to achieving this vision

are the completion of the new East-West Rail line connecting Oxford and Cambridge by 2030 and accelerating development of the Oxford-Cambridge Expressway.

2.26 The Expressway is at an early stage and an indicative timeline from the Final Stakeholder Reference Group Meeting 18 October 2017[8] suggested that a decision on the Corridor would be made in summer 2018, followed by a route options shortlist for consultation in autumn 2019, and the preferred route announcement to be made in autumn 2020.

2.27 Until the preferred route of the expressway is announced in 2020, it is difficult to predict with any certainty how the expressway could impact Oxford, especially as there are two sub-route options to the north and south of the city. It is also likely that any impacts on Oxford will be what is known as 'last-mile' impacts which, in part, involve Oxford's internal infrastructure working well to provide a range of accessible choices for users to reach their final destination.

2.28 Give the submission of the Oxford Local Plan 2036 must take place by 31 March 2019, it is unlikely that any certainty on the route options will have been made by then. As such, while it is acknowledged as an important piece of national infrastructure, the Expressway is not at an advanced enough stage to fully take account of any impacts it may have within this IDP.

Objectively Assessed Need Update (2018)

2.29 GL Hearn provided an update to the Strategic Housing Market Assessment (SHMA) which was undertaken in 2014. This Objectively Assessed Need Update (OANU) uses the same methodology as the previous SHMA, but has used the most up-to-date household forecasts and has re-calculated the implications of economic growth. A new calculation of housing need based on the Government's standard methodology set out in the NPPF was not undertaken for a number of reasons. It is considered that exceptional circumstances justified the use of an alternative approach, as allowed for in the NPPF.

2.30 The 2014 SHMA considered that Oxford's objectively assessed housing need was between 1,200-1,400 dwellings per annum (dpa). The OANU Report uses a different methodology, which does not take account of local aspirations for additional employment, affordable housing need supply or housing growth as these are considered policy positions.

2.31 The 2018 update found that, in order to meet Oxford's affordable housing need in full, based on a policy of 50% delivery of affordable housing, 1,356

[8] A1 East of England and Oxford-Cambridge Expressway Strategic Study Final Stakeholder Reference Group (18/10/2017) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/657244/A1-east-of-england-stakeholder-presentation-oct-2017.pdf

dwellings per annum would be required. The report concludes that this figure is very similar to the level of growth identified in the 2014 SHMA.

Housing and Employment Land Availability Assessment Update (2018)

2.32 TBA The Employment Land Assessment (2018) looked at the whole range of employment sites across the city and assessed them against criteria including access and location, quality of buildings and environment, neighbourliness and others. The ELA forecast that between 2016 and 2036 there is a need for 71,150m^2 of additional employment floorspace:

- total projected demand for new B1A/B/C floorspace of 62,450m^2; and
- projected demand for B2/B8 floorspace of 8,700m^2

2.33 The report concluded that the employment demand during the plan period will be for B1 floorspace. This reflects the findings from previous economic studies and the views of property agents secured through the assessment.

2.34 The need for more employment floorspace over the plan period emphasises the strong need to protect existing employment sites. Oxford is a very tightly constrained city and the competing demands on the limited land supply are strong, not least for housing. The Local Plan includes one additional employment site at Northern Gateway, as detailed in the Northern Gateway Area Action Plan. Additional employment land could be provided through the intensification of uses at existing employment sites including Osney Mead, Unipart, and the BMW works. There is some remaining land allocated for employment uses at both Oxford Business Park and the Science Park.

3. Delivery Mechanisms/ Sources of Funding

Introduction

3.1 The fundamental purposes of this IDP are to assess what infrastructure is required in respect of the Oxford Local Plan 2036, where that should be, when it is required and how much it will cost. There are a variety of funding sources available for the provision of infrastructure. This section provides an overview of those available to support the delivery of the required infrastructure to support the Oxford Local Plan 2036.

Community Infrastructure Levy

3.2 Oxford City Council is a CIL Charging Authority and the Council are currently reviewing their Charging Schedule. The Draft Funding Gap ((Jan 2018) indicates that CIL could generate in the region of £47.8 million over the Local Plan 2036 plan period. CIL funding is never expected to be able to fund all infrastructure projects because the levy at which it is set must ensure that new developments remain viable.

Projected S.106 Income

3.3 A potential source of income is developer contributions secured via S.106 Agreements for infrastructure related to on-site mitigation. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the following tests that they are:

- necessary to make the development acceptable in planning terms;
- directly related to the development and;
- fairly and reasonably related in scale and kind

3.4 Whilst this potential income must be used to fund the specific works related to the planning permission, the works mighty have a secondary effect of improving strategic infrastructure identified in, for example, the Oxfordshire Infrastructure Strategy. A S.106 contribution taken to create a cycle path into and through a development might have a knock-on improvement to the strategic cycle network and thus contribute to a wider infrastructure project.

3.5 It is anticipated that a threshold will be used to determine which sites would fall outside the CIL regime and whose infrastructure would be entirely funded through S.106. An example of such a scheme is the Northern Gateway. It is anticipated to fall outside of the CIL regime and could secure a significant S.106 contribution.

Council Tax

3.6 The additional new homes across Oxford City over the lifetime of the Plan will generate a significant amount of additional council tax subject to Central Government's calculation of Councils' Spending Power and any resulting equalisation. The average 2018/19 band D Council Tax in Oxford City is £1,925.11.

3.7 It is clear that Councils will be expected to rely primarily on income from council tax and business rates and growing external income – for example, through the creation of the Local Authority Trading Company. Forecast growth in business and council tax bases however remain very important from a financial planning perspective.

3.8 Clearly with additional homes comes additional capital financing and revenue costs; for instance, the increased demands in service areas such as refuse collection, disposal and recycling, schools, public health, highway maintenance and so on. In addition, Councils will have already factored in some tax-base buoyancy into their financial planning. Any excess income associated with increased council tax bases after the effects of increased costs or neutralisation by the Government through the new system of local government finance could be available to support new borrowing for infrastructure.

New Homes Bonus

3.9 The New Homes Bonus (NHB) was introduced in 2011 to provide an incentive to local authorities to encourage housing growth. It is not ring-fenced and councils can decide how to spend the monies in consultation with the local community.

Business Rates

3.10 Business rates are paid on commercial property, such as factories, offices and shops. The government plans to increase the share of business rates English councils retain from 50% to 75% in 2020 and is piloting 100% retention in parts of the country.

Community Infrastructure Levy Funding

3.11 As explained at paragraph X above the City Council is a CIL Charging Authority and is reviewing the amount of CIL it charges. CIL can be used to fund a wide variety of projects providing they meet the definition set out in legislation.

Local Growth Funds

3.12 Through the Local Growth Funds 1 and 2 the Oxfordshire LEP has secured £118.4m to support dynamic economic growth investing Oxford and Oxfordshire's infrastructure including Headington and Eastern Arc Transport Improvements, Oxford Flood Risk Management Scheme, Northway and Marston Flood Alleviation Scheme, a package of transport

improvements for Oxford Northern Gateway and transport and site improvements at the Oxpens site in central Oxford. £24.16m of Local Growth Fund 3 funding has also been secured and will be invested in a series of jointly-agreed priorities.

Private Sector Funding

3.13 It is widely recognised that the private sector will have a fundamental role to play in the delivery of infrastructure. The City and County recognise that they have an important role to play in enabling the delivery of infrastructure identified in the Local Plan 2036 through their Development Management, Regeneration and Economic Development, Asset Management; and Highways, Waste and Education functions. The LEPs as the voices of the business community are well placed to articulate business needs and broker negotiations and discussions on behalf of the private sector with local authorities. Government and other key partners such as the utility providers to identify, budget for and lobby for funding to support infrastructure delivery.

4. Overview of Infrastructure Requirements

4.1 This section provides an overview of Oxford's infrastructure requirements under the categories of physical, social and green infrastructure. It draws on key findings of studies, discussions with infrastructure providers and other evidence gathering undertaken in relation to adopted and emerging plans. Specific discussions have taken place with infrastructure providers to inform this infrastructure plan.

4.2 Individual developments may be required to deliver site specific infrastructure through S.106 agreements to make the development acceptable in planning terms. It is not the intention of this IDP to set out the infrastructure for every development site, as this would depend on the detail of the proposal at the time of a planning application, but rather to identify key infrastructure that will be required to support housing and economic growth in Oxford.

4.3 The particular types of infrastructure are as follows:

Physical – Transport, Water Supply, Wastewater (sewerage and sewage treatment works), Electricity, Renewable Energy, Gas, Waste and Digital Infrastructure.
Social – Education (Primary and Secondary), Post-16 Further Education, Early Years (Children's Centres and Nurseries), Community Facilities, Health, Police, Fire and Rescue, Housing (Extra Care), Culture and Tourism
Green – Open Space, Biodiversity, Cemeteries

Physical

Transport

Strategic Road Network

4.4 In order to set investment in the Strategic Road Network (SRN) the government publishes a multi-year 'Road Investment Strategy' (RIS). The first RIS covered the period 2015-2020 and sets out a long-term vision, high level objectives and a multi-year investment plan to improve the network and create better roads for users. Alongside establishing the RIS, the government, created Highways England – a government-owned strategic highways company, through supporting legislation, including the Infrastructure Act.

4.5 The second "Road Investment Strategy" RIS2, which covers the second road period from 2020-2025 was consulted upon in late 2017-18. The RIS2 Strategic Road Network Initial Report set out Highways England's assessment of the current state of the SRN, the potential future needs and their proposed priorities for RIS2.

4.6 As part of RIS1, Highways England produced a series of route-based strategies. Of particular relevance to Oxford are Solent-Midlands strategy,

and the London-Scotland West Strategy. Both of these strategies set out a series of improvements to the SRN including several close to Oxford. As part of RIS1, a commitment was also made to six strategic studies. The Oxford-Cambridge Expressway being of relevance to Oxford.

4.7 Planned works affecting Oxford include A34 Junction improvements for the 2020-2025 period, further work on the Oxford-Cambridge Expressway and technology improvements for the A34 planned to commence in 2019/20.

Rail

4.8 Oxford Parkway Station. Bay Platforms at Oxford Station. Cowley Branch Line. East-West Rail – Phase I between Oxford-Bicester already complete

County Transport

4.9 Connecting Oxfordshire is Oxfordshire County Council's Local Transport Plan (LTP4). It sets out the strategies and policies for developing the county's transport system between 2015 and 2031. Where significant growth in housing and/ or employment is planned, area strategies have been developed. Relevant to Oxford, Connecting Oxfordshire includes a bespoke Area Strategy for Oxford City.

4.10 The Oxford Transport Strategy (OTS) is one of the area strategies that make up the Oxfordshire LTP4. The OTS sets out the County Council's transport vision and strategy for Oxford over the next 20 years. It identifies the current and future challenges for transport in the city and sets out a strategy based on a combination of infrastructure projects and supporting measures to enable economic and housing growth.

4.11 The OTS has three components: mass transit; walking and cycling; and managing traffic and travel demand. The strategy considers that there is no single solution to tackling Oxford's long-term challenges and that all three components are needed in combination to deliver the objectives of the OTS.

4.12 The OTS includes the following planned improvements that are of greatest significance to Oxford:

Improvements to Rail:

- Oxford Station Masterplan
- East-West Rail Phases 1 & 2
- Great Western modernisation
- Cowley Branch line
- Rapid Transit
- Oxford rapid transit routes
- Conventional bus network
- Supporting infrastructure, i.e., corridor prioritisation, corridor studies, appropriate stops and transport hubs (Corridor studies:
  (P&R sites: A40 site 6 Eynsham £11.1m(2016-21); A420 site 5 Cumnor – £11.3m (2026-31); A34(S) Site 3 – Lodge Hill £14.1m (2026-31); A4074

Site 3 Sandford – £11.4m (2026-31); Thornill – £2.8m (2021-26); A34(N) Site 2 Oxford Parkway £10.0m & £11.4m (2016-21); A44 Site 7 – London Oxford Airport - £12.5m (2016-21))

City Centre

- A range of measures, including pedestrianisation of key streets, is proposed for the city centre (City-wide movement study costs -

Walking and cycling improvements

- Enhancing the cycle network (e.g., cycle network classification)
- Corridor studies
- Junction treatment
- Cycle parking and signage
- Public realm improvements to encourage walking and reduced volume of traffic in the city centre

Managing traffic and travel demand

- Highway capacity improvements (A40-A44 link Road, HE A34 Improvements, SE ring-road capacity improvement, Eastern Arc traffic controls))
- Workplace parking (workplace parking levy)
- Controlled parking zones (ambition for city-wide CPZ)
- Road-user charging
- Parking charges

4.13 Oxfordshire County Council considers the cost of delivering all of the projects within the OTS to be around £1.2billion. This included £600m for the construction of a bus tunnel. The OTS refers to potential funding sources at page 33. In addition, many of these transport projects are referred to in OxIS and funding for some of the projects could potentially come from the Housing and Growth Deal fund announced in 2017.

Water Environment

4.14 This main elements to consider in this section are as follows:

- Water Resources and Water Supply;
- Waste Water Collection and Treatment;
- Flood risk and Flood Management.

4.15 Thames Water is the UK's largest water and wastewater services company. They serve over 13.5million customers in London and the Thames Valley area. The Environment Agency's role is to monitor Thames Water's environmental related activities, including issuing of permits for discharge from sewage works, the supply of drinking water, as well as the role of monitoring water quality.

4.16 To support the production of this IDP, two key pieces of evidence base have been produced by Wallingford Hydrosolutions Ltd. These are the:

- Strategic Flood Risk Assessment (Level's 1 & 2)
- Water Cycle Study

4.17 Both of these documents are available as part of the evidence base library for the Oxford Local Plan 2036. Key conclusions may be referenced here in the IDP but the full detail of both these reports, have not been replicated in the IDP.

4.18 Both the Environment Agency and Thames Water have been involved with the progression of work on Oxford's Local Plan 2036 and this IDP.

4.19 A sequential test has been undertaken to support the Local Plan 2036 Proposed Submission Document. This has been informed by the Strategic Flood Risk Assessment.

4.20 The Water Cycle Study (WCS) identifies in a holistic sense and quantifies (where possible), the capacity of all water-related infrastructure and the wider environment within the city to support new housing and commercial developments.

4.21 The WCS encompasses a range of factors which can be designated into four key areas, namely:

- Environmentally, economically and licenced availability of water resources for abstraction and use
- Sewerage treatment and disposal (subdivided into environmental and infrastructure capacity)
- Flood risk arising from further development; and
- Other environmental considerations and constraints to development =

Water Resources and Supply

4.22 As a statutory water undertaker Thames Water has a duty to maintain the security of the water supply and every five years they are required to produce a Water Resources Management Plan (WRMP) which sets out how they plan to meet customer's needs while protecting the environment over the plan period. Thames Water published their current WRMP in February 2015 for the period 2015-40. The next WRMP will run for eighty years from 2020 to 2100. At the time of writing this WRMP is known as the draft WRMP 2019.

4.23 Thames Water breaks down its whole area into sub-areas. These sub-areas are known as Water Resources Zones (WRZ). Oxford sits within the Swindon-Oxford (SWOX) WRZ.

4.24 Thames Water has assessed the impact of forecast population and housing growth on water resources as part of their draft WRMP 2019. According to the WRMP 2019 the base population (2016/17) in the SWOX area is 1,021,825. Oxford has a population of 154,600 based on the Office of National Statistics (ONS) 2017 mid-year estimate, which translates to approximately 15% of the SWOX base population. The population forecasts

for the SWOX area show an increase in population from the base year of 250,000 by 2036. In the absence of a breakdown for each local authority area, Thames Water has assumed growth to be uniform across the SWOX WRZ. For the purposes of predicting future water supply/ resources, Thames Water has planned for a growth in population of 15% of 250,000 at 37,500.

4.25 The WRMP also calculated the projected number of dwellings to 2045 using local authority plans. For the base year (2016/17) the SWOX area has a total of 425,681 properties, by 2036 an additional 105,486 properties are expected to have been built. The WRMP predicts an occupancy rate of 2.37 per property in 2036. Taking the occupancy rate and forecasted projection growth for the SWOX area and translating it into the Oxford area specifically, suggests that 15,800 properties will be needed to accommodate the 37,500 people expected to live in the city by 2036. Thames Water estimates that under this scenario could lead to a deficit under "Dry Year Critical Period" (DYCP) conditions of approximately 2.85Ml/d in 2035/36.

4.26 Oxford City Council provided two scenarios to input into the WCS. A low growth (8,000 dwellings) and a higher growth (12,000 dwellings) scenario. Using the same occupancy rate assumptions as those in the WRMP, this translates to an additional 19,000 and 28,500 people respectively. The per capita use in 2036 under the DYCP is estimated as 172.5 l/person/day. This is based on dividing the total household consumption by the projected population in the SWOX area for 2036.

4.27 The WCS considers that based on the Dry Year Annual Average forecasts in Thames Water's latest WRMP, there should be enough water to supply Oxford for the majority of 2036 and beyond. However the Dry Year Critical Period forecasts show that during periods peak demand a deficit will begin in 2022, growing to potentially 2.85Ml/d by 2036.

4.28 The WRMP identified demand management through a combination of leakage reduction, smart metering and the promotion of water efficiency as the best way to negate a water deficit in the SWOX area in the short to medium term (2020-2045). This has been estimated to provide a 4.6Ml saving by 2030 which should be sufficient to office the deficits estimated.

4.29 It is worth noting that abstraction licences are limited in Oxford, mainly due to the Oxford Meadows special area of conservation (SAC). In total there are four licences, the majority of these are not for public use, and their impact on water resources in Oxford is thought to be minimal.

4.30 Oxford City Council is proposing a water efficiency policy in the Local Plan 2036 to restrict water use in new developments to XXX l/d.

Water Disposal and quality issues

4.31 The WCS assessed the infrastructural capacity of the wastewater system and environmental capacity of the receiving water environment. Infrastructure capacity is defined as, the ability of the wastewater system, to collect, transfer and treat wastewater from homes and businesses. The

environmental capacity is defined as the water quality needed to protect aquatic and wildlife environment.

Infrastructural Capacity

4.32 The Oxford sewer network manages demand from over 250,000 customers sited in Oxford and the surrounding areas. The catchment is served by the Oxford Sewer Treatment Works (STW), located to the south of the city, and Littlemore Pumping Station (SPS).

4.33 The Oxford STW is the most important structural asset with respect to future development in Oxford. It has recently benefitted from a large increase in capacity following a project to upgrade the sludge stream and introduce a Thermo-Hydrolysis plant. The upgrade is said to provide the required additional sludge treatment capacity required for the growing local population.

4.34 At the Oxford STW, a project to upgrade the sludge stream at the treatment works was completed in March 2014. The upgrade of the Oxford STW was to provide the additional sludge treatment capacity required for the growing local population. Thames Water will undertake further work if required during the plan period to ensure that infrastructure keeps pace with growth however the current management plan for the Oxford area does not currently include measures to increase capacity of the Oxford STW.

4.35 In the short/ medium term, there is a commitment to implement interventions that address any problems at the inlet of the STW. Longer term, a commitment exists to continue to monitor the effects of growth and climate change on the STW to ensure that it can cope with any future increases in catchment population.

4.36 In terms of environmental capacity, the Environment Agency's catchment data explorer suggests that most of the watercourse in the Oxford area have good or high ecological status and good chemical status. This suggests that overall, they are not vulnerable at present and that there should be environmental capacity to permit development. However it is vital that correct measures are followed by several stakeholders including developers, the EA, local authorities and water companies that the current statuses of the watercourses either stay the same or improve.

Flood Risk

4.37 The Oxford Local Plan 2036 is supported by a Strategic Flood Risk Assessment (SFRA) Levels 1 and 2. The Level 1 SFRA provides an overview of flood risk (from all sources) and Oxford City Council has undertaken a Sequential Test to look at how best to locate development sites in terms of their flood risk. The Level 2 SFRA looks at those sites proposed for allocation in higher risk flood zones and sets out which of those sites would be likely to pass the Exception Test.

4.38 The WCS includes a high-level review of flood risk in Oxford, and its relationship with development proposals. It concludes that the impact of

development on flood risk, and the impact of flood risk on development will be reduced by following the sequential and exception tests outline in the NPPF and by ensuring that development in the study area follows SuDS guidelines. The Oxford Local Plan 2036 is supported by the aforementioned evidence.

Electricity

4.39 Scottish Southern Electricity Networks (SSE) is responsible for delivering electricity distribution across southern England, including Oxford. SSE was contacted in relation to the likely impacts of proposed development allocations in the Oxford Local Plan 2036 on their networks.

4.40 The Southern Electric Power Distribution Long Term Development Statement (LTDS) identifies the network parameters and load forecasts across the SSE network. The main purpose of the LTDS is to assist existing and prospective users in making new or additional use of the existing distribution system.

4.41 SSE were contacted in August 2016, June 2017 and again in August 2018 to confirm whether any additional upgrades (other than those planned for) would be required to enable the amount of growth proposed for Oxford to be delivered within the plan period. SSE was asked whether it was broadly satisfied with the level of growth proposed in Oxford, and that any upgrades to the network that may be required to serve the proposed levels of development, will be provided in a timely manner. SSE responded saying that they had no comments to make in relation to this enquiry. Oxford City is therefore satisfied that SSE does not foresee any issues in delivering any required infrastructure to support development in a timely manner.

Renewable Energy

4.42 Renewable energy is an integral part of the Government's longer-term aim of reducing CO_2 emissions by 80% by 2050 and reductions in CO_2 emissions of at least 26% by 2020, against a 1990 baseline. The Planning Act 2008 introduced statutory duties for local plans to take action on Climate Change. Oxford City Council agreed to reduce CO_2 emissions by 40% by 2020.

4.43 Renewables and low carbon energy technologies are usually secured to comply with policy requirements in the Development Plan when negotiating on planning applications and will therefore generally be funded by developers.

Gas

4.44 A gas supply is currently regarded as an essential utility provision for new development. The national high pressure gas transmission system is owned by National Grid, but the lower pressure local distribution network in the Oxford area is owned by SGN. SGN were contacted to confirm that their existing network has the capacity to accommodate future development proposals within the city.

4.45 SGN assessed all of the sites proposed for the Regulation 19 consultation to identify whether there could be any issues with the gas network. The results of the network capacity assessment showed that the majority of sites would be unlikely to have any issues connecting to the gas network. This was due to appropriately sized gas mains and pressures in the surrounding area. The results showed that fourteen sites may require reinforcement given the size and pressures in the current gas mains and the amount of development proposed. Ten sites were likely to require reinforcement or in some cases significant reinforcement of the network prior to connection. Discussions between the developers and SGN on relevant sites should take place at an early stage to ensure that the appropriate upgrades to the network can happen prior to development being completed.

Minerals and Waste

4.46 The County Council is the Minerals and Waste Planning Authority. A new Minerals and Waste Plan for Oxfordshire is being developed in two parts. The Minerals and Waste Core Strategy was adopted by the County Council in September 2017. Work is now underway on a site allocations plan. The main purpose of the Sites Plan is to allocate the sites required to provide the additional capacity for minerals supply and waste management as set out in the Core Strategy. At the time of writing the Sites Plan Issues and Options Consultation was taking place. The plan did not suggest any additional waste management sites within Oxford City and suggested one potential minerals site.

4.47 Waste Infrastructure is used in the collection, treatment and disposal of residential and commercial waste. The current focus of waste policy is on more sustainable approaches to waste, namely increasing the value recovered and decreasing the amount sent to landfill.

4.48 There is one Household Waste Recycling Centre (HWRC) within Oxford at Redbridge, Abingdon Road. Other types of waste sites include Horspath Road (recycling transfer), Pony Road (hazardous), Cowley Marsh Depot (recycling/ transfer) and Jackdaw Lane (metal recycling).

4.49 The Minerals and Waste Core Strategy sets out in Policy W11 that these waste and recycling sites are safeguarded in the plan for these uses unless the site is allocated for development in an adopted local or neighbourhood plan; or equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or it can be demonstrated that the site is no longer required for waste management.[9]

4.50 The Minerals and Waste Core Strategy sets out a strategy to ensure that sufficient building materials and waste management facilities are available to meet the proposed levels of growth in Oxfordshire which, for the

[9] Oxfordshire Minerals and Waste Local Plan Part 1 - Core Strategy, September 2017, Oxfordshire County Council

Digital Infrastructure

4.51 In March 2017, the government published the UK Digital Strategy[10], the ambition of which is to *"create a world-leading digital economy that works for everyone"*. The Digital Strategy highlights the investment needed to be provided by government in digital infrastructure including next-generation technologies such as full fibre and 5G. The Digital Strategy was taken forward as part of the Industrial Strategy White Paper and the Government completed, in July 2018 the Future Telecoms Infrastructure Review[11].

4.52 Key recommendations from the Future Telecoms Infrastructure Review that are relevant to this IDP include:

- New legislation that will guarantee full fibre to all new build developments;
- A new nationwide network which will reduce the costs, time and disruption caused by street-works by standardising the approach across the country; and
- Infrastructure (including pipes and sewers) owned by utilities such as power, gas and water should be easy to access, available for both fixed and mobile use

4.53 Ensuring that Oxford has up-to-date and appropriate infrastructure is therefore an important element of this IDP. Oxford is a largely urban authority and as such already has a good level of digital infrastructure. In particular, there is a reasonable superfast broadband network within Oxford, which is critical to attracting inward investment.

4.54 Oxford is one of 50 cities in phase 3 of the Government's Super-Connected Cities Programme which launched in 2013. The Government has since made a future financial commitment to the programme, which is managed by Broadband Delivery UK (BDUK). The aim of the Super-Connected Oxford programme is to enable superfast broadband for everyone, everywhere in Oxford.

4.55 The Local Plan 2036 supports digital infrastructure through the inclusion of a policy requiring new employment (B1/B2) floorspace to be supported high quality digital facilities. The plan also makes a commitment for the City Council to work with providers to deliver the expansion of high quality digital infrastructure throughout Oxford.

Social Infrastructure

Education

4.56 The County Council is the Local Education Authority and has a statutory duty to ensure that there are sufficient school places for all children of statutory school age living in Oxfordshire and whose parents/ carers apply for a place at a publicly funded school.

[10] UK Digital Strategy, March 2017, DDCMS
[11] Future Telecoms Infrastructure Review, July 2018, DDCMS

4.57 The County Council produces a Pupil Place Plan[12] annually. At the time of writing the most up-to-date version is the 2017-21 which was published in November 2017. The Pupil Place Plan shows how the County Council expects school provision to change throughout its duration. It brings together information from a wide range of sources and sets out the issues the Count Council will face in meeting its statutory duties for providing nursery and school places up to 2021 and beyond.

4.58 The Pupil Place Plan includes present and predicted future pupil numbers on roll, together with information about birth rates, school capacity, and new housing. It sets out proposed changes in the number of school places available over the next year and it suggests where other changes may be necessary in the future. The Plan also sets out the County Council policies on school organisation and the statutory framework for making changes such as opening, closing or enlarging schools.

4.59 Data from the Office of National Statistics shows that birth rates have been falling in Oxford. The city had 1,919 births in 2013 compared to 1,624 in 2017, a fall of around 15%[13]. This, alongside migration and housing growth, are factors that increase demand for the availability of school places as well as the availability of early education places.

4.60 Increasing school capacity is usually accommodated in one of two ways. Either by school expansion or the provision of new schools. Rapid growth in demand for primary school places in recent years has required many schools to expand, and there are few opportunities for further expansion within schools in Oxford.

Early Years Free Entitlement

4.61 At present there is sufficient capacity to meet current demand however the Pupil Place Plan recognises that additional capacity will be required to meet additional demand created by housing developments in the city although this is not quantified in the most recent Pupil Place Plan 2017-21.

Nursery Schools

4.62 There are four community Nursery Schools run by the County Council in Oxford. Each offers places for a number of part-time equivalent places for pupils. Schools often offer nursery places as a part-time place of 15 hours per week, usually offered as 5 mornings or 5 afternoons. The number of part-time places is shown, so for example, 10 part-time places could mean 5 children in the morning and 5 in the afternoon or 10 children in the morning and none in the afternoon. The Pupil Place Plan provides current part-time equivalent places for each of the four nurseries in Oxford.

[12] Pupil Place Plan 2017-21, November 2017, Oxfordshire County Council
[13] Office of National Statistics – Births in England and Wales, 2017

Primary School Places

4.63 Rapid growth in demand for primary school places in recent years has required many schools to expand and there are now few opportunities for further expansion in Oxford. The main increase in primary school capacity up to 2021 will be delivered through a new 1.5 form entry primary school in Barton. This school, sponsored by the Cheney School Academy Trust is due to open in 2021. This will have the potential to expand to a 2-form entry primary school later in the Local Plan period to 2036 (if required).

Secondary School Places

4.64 The Pupil Place Plan considers an increase in school places will be required from 2019. These will be delivered through the Swan School, as part of the River Learning Trust, which submitted a planning application to deliver the new school in 2018. The Swan School is anticipated to deliver an additional 180 place per year which will be sufficient up to 2021. Proposals for significant housing development on the outskirts of Oxford (Cherwell Local Plan Part 2) would be expected to require another new secondary school to serve the city and surrounding area.

Future Housing developments and their relationship to school places

4.65 The Pupil Place Plan looks at a number of significant housing developments when making the forecasts of school places. These include Oxpens, the Hospital sites, and a range of other potential future development sites considered in the Oxford City Local Plan. The Pupil Place Plan breaks these down into wards to see where development pressures will be in future years.

4.66 The County Council provided the following formal comments at the preferred options stage:

"The County Council will work closely with the City Council to ensure that any housing allocations will be able to be met by an appropriate and timely increase in school capacity within the City or in neighbouring authority areas where new schools are to be provided in urban extensions to the City. The County also expects to be able to secure full funding for additional school places through the CIL or Section 106 or any other new funding contribution process.

Current pupil forecasts indicate that sufficient primary and secondary school places to meet Oxford's growth can be provided through existing school, including some further intensification of use, and the new schools already planned, i.e. the new primary school at Barton West and the new Swan secondary school. However it may be that particular concentrations of growth will require additional school provision. Therefore the County Council requests that land be available adjacent to or very close to, an existing school site. In particular the County welcomes the identification of land in the Osney Mead/ Oxpens area to facilitate the expansion of school capacity."

4.67 The County Council were contacted in relation to school places. They confirmed that the Pupil Place Plan was the main document, which is updated

annually. They also confirmed that the Oxfordshire Infrastructure Strategy (OxIS) detailed longer term more strategic issues.

4.68 The County Council have stated that they are supportive in principle of the emerging Local Plan in their response to the 'Preferred Options' version of the document which sets out the level of growth proposed in Oxford.

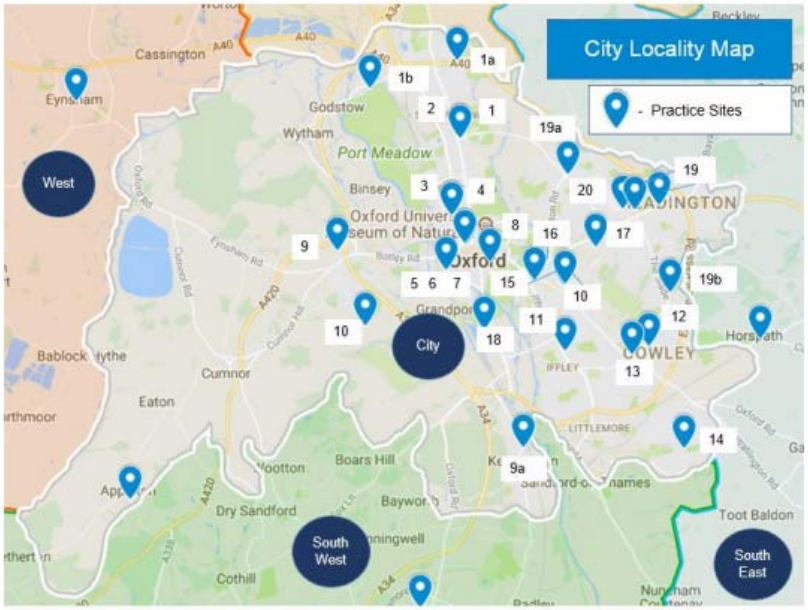
Health

4.69 Oxford's local health priorities include, reducing obesity in children and adults and increasing physical activity. The health of people in Oxford is very varied compared to the England average. About 20% of children living in Oxford live in low-income families and inequalities exist such as life expectancy which is 9.7 years lower for men in the most deprived areas of Oxford than in the least deprived areas.

4.70 Oxford City NHS Locality is served by twenty GP practices grouped into six neighbourhoods. There is an out-of-hours service which runs from the East Oxford Health centre which is GP led. An Ambulatory Assessment Unit runs from the John Radcliffe Hospital. The Oxford Locality Plan produced by the Clinical Commissioning Group suggests that there is a growing shortage of GPs in the Oxford City locality, which is likely to be further impacted by changes to urgent and emergency care and the growing demands of the population.

4.71 It is worth noting that the Oxford City NHS Locality is larger than the administrative area of Oxford City. It is also worth noting that two of the Neighbourhood Practices (Botley Medical Centre (including Kennington) and South Oxford Health Centre are actually located outside of Oxford's tightly drawn administrative boundary. Figure X below shows the Oxford City locality.

Figure 1: Practices and branch surgeries in the Oxford City Locality



4.72 Figure 1 clearly shows the Oxford City locality map extending well outside of the Oxford city's administrative boundary and including Cumnor, Botley and Kennington, all of which fall within the Vale of White Horse administrative area.

4.73 There are 21 GP Practices within the Oxford City Locality. Most (if not all) have at least one GP. The GP Practices within the Oxford City Locality cover a registered population of 222,946 people as at 1 April 2018.

4.74 The Clinical Commissioning Group (CCG) has produced a Localities Plan for Oxford City[14] (The Localities Plan). The Localities Plan sets out a range of material including city demographics, how the population in Oxford accesses services and provides an overview of potential requirements going forward in terms of the social infrastructure required to serve Oxford's housing growth. The Localities Plan suggests that there is a growing shortage of GP's in the Oxford City locality, which is likely to be further impacted by changes to urgent and emergency care and the growing demands of the population.

4.75 The Localities Plan includes a section entitled "Estates". This section discusses the needs of the Primary Care estate now and going forward into the future. The CCG considers that the Primary Care estate across Oxfordshire needs considerable investment to make it fit for the future. Recognising that some practices require capital funding investment now and considering that large areas of housing growth will mean that infrastructure will need to be improved in order to deal with the population increase. However the Localities Plan is not specific about which practices in the Oxford locality would require this investment (other than two practices requiring immediate investment). The Localities Plan recognises that building space in the city is limited, and that according to the data on registered patients the average number of patients per square metre is higher than their historic core space requirements for a practice.

4.76 The Localities Plan sets out the practices with the most critical need for premises development in the Oxford City Locality. These are at Summertown and the City Centre. At the time of writing no capital funding had been secured by the CCG for these practices. The Localities Plan suggests that the CCG should explore alternative funding sources (including developer funding), and their representations sets out a potential methodology to obtain funding from Developer Contributions. The City Council will continue to work with the CCG to ensure the delivery of appropriate facilities to support the growth of the City.

Hospitals

4.77 The Oxford University Hospitals Trust consists of the following four hospitals:

[14] Oxford City Locality Plan, January 2018, Clinical Commissioning Group

- The John Radcliffe;
- The Churchill;
- The Nuffield Orthopaedic; and
- The Horton Hospital (Banbury)

4.78 The most recent version of the Oxford University Hospitals Business Plan is the 2017/18 version (The Business Plan). The Business Plan outlines the 'local strategic context' in which it operates and provides an overview of the Trusts' activities for the coming year. Included within a section on "Infrastructure", which states,

"The delivery of excellence in healthcare, education and research is also challenged by infrastructure issues. While the Trust has a number of state-of-the-art facilities it also a significant proportion of ageing estate. In addition, access to the Headington sites is challenging as the transport infrastructure is not designed to accommodate the number of staff, patients and visitors travelling to the three Oxford OUH hospital sites and parking is restricted by local authority transport policy."

4.79 It also includes a section on "Long term estates planning, which includes in its work programme the creation of a progressive Trust Master Plan from 2017-47; and "Premises Development" – to support service capacity requirements to review opportunities for reuse and the redistribution of space.

Dental Practices

4.80 There are 26 NHS dental practices in the city most of which have more than one dentist. In terms of qualitative data, the NHS provides information on whether practices are accepting new patients of different types (a measure of access). There are three categories of patient in this regard: fee paying adults, new charge exempt adults, and new children.

- In postcode sector OX1 there are five practices, only one is taking on new adults as patients (both fee paying and non-fee paying) and three are taking on new children.
- In postcode sector OX2 there are two practices, only one is taking on new adults as patients (both fee paying and non-fee paying) and both are taking on new children.
- In postcode sector OX3 there are ten practices, five are taking on new adults as patients (both fee paying and non-fee paying) and five are taking on new children.
- In postcode sector OX4 there are nine practices, six are taking on new adults as patients (both fee paying and non-fee paying) and five are taking on new children.

Community Services/ Facilities

4.81 Ten of Oxford's 83 'Super Output Areas'[15] are amongst the 20% most deprived areas in England. These areas, which are located in the Leys, Littlemore, Rose Hill and Barton areas of the city, experience multiple levels of deprivation - low skills, low incomes and relatively high levels of crime. Around 23% of Oxford's under 16s live in low-income households and child poverty is a key concern in eight neighbourhoods which feature among the 10% worst affected in England.

4.82 Oxford City Council owns and operates 18 community centres across the city. The centres help to bring communities together, and achieve the wider objectives of improving skills, reducing inequalities and creating strong and active communities. They differ widely in their size, range of activities hosted and their physical condition.

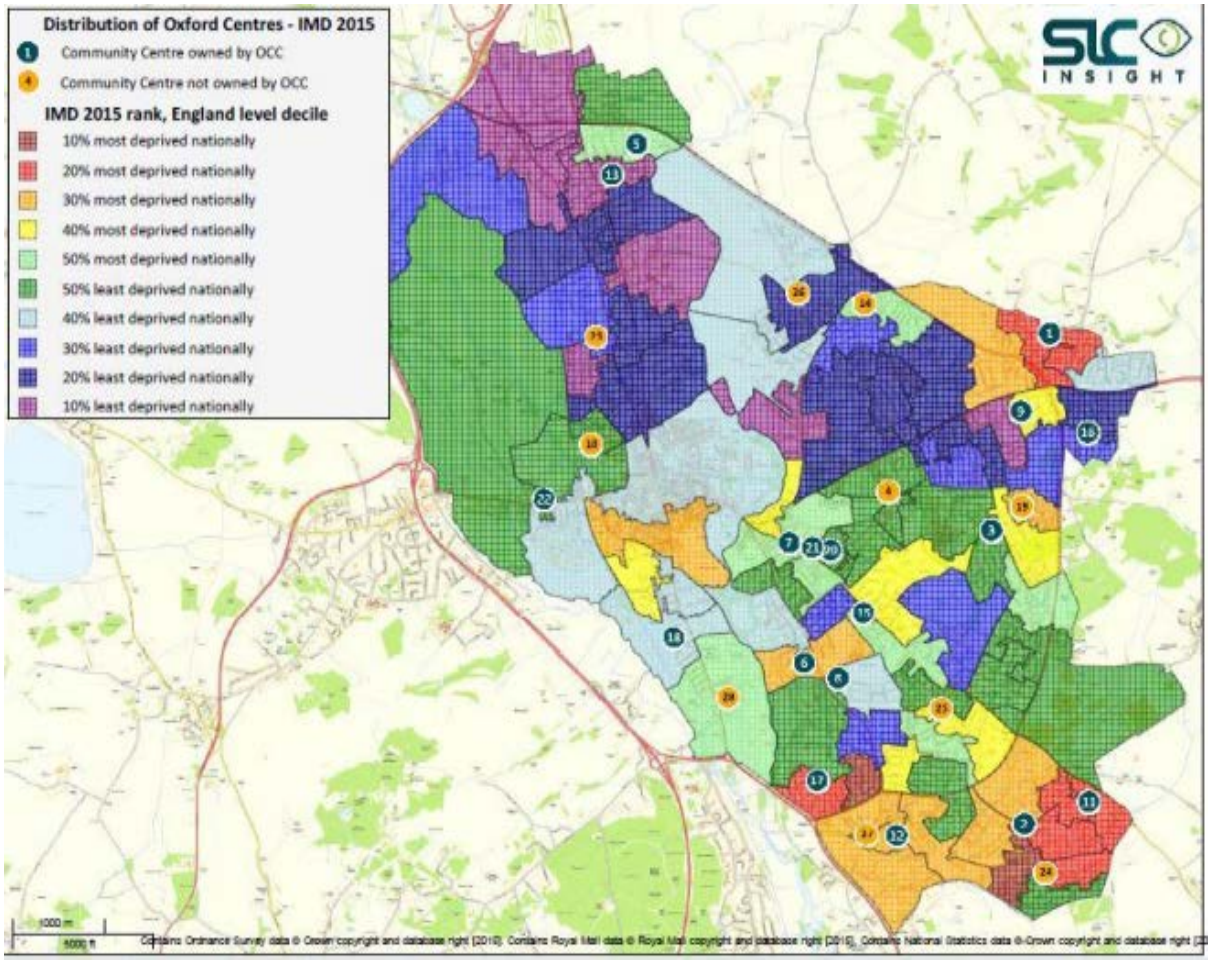


Figure 2: IMD 2015 and distribution of Oxford community centres (Source: Community Centres Strategy 2016-20)

4.83 In addition to the community centres there are 300 other facilities across the city offering community space. Most of the community centres are managed by Community Associations. Many of the buildings are old and

[15] 'Super Output Areas' are a geographic based collection and publication of small area statistics.

require increasing levels of maintenance. Across the centres there is around £1.7 million of backlog maintenance. There is a commitment to invest and undertake this works if funding becomes available.

4.84 In order to effectively and efficiently deliver the long term management of the network and the associated support structures provided, the Council has prepared a 'Community Centres Strategy 2016-2020'[16]. The strategy makes proposals for improvements to community hubs in Blackbird Leys, Barton, East Oxford, Rose Hill, South, and West Oxford.

Museums

4.85 Oxford contains many internationally recognised museums such as the Ashmolean Museum, Pitt Rivers Museum and the Museum of National History. The City Council runs the Museum of Oxford which recently submitted a bit to the Heritage Lottery Fund (HLF) for a project which aims to open up and share the heritage of the city's communities. *'Oxford's Hidden Histories'* will make objects currently in store accessible, uncover archival records mapping the city's development and explore Oxford's intangible heritage through the memories of local people. This will be achieved by redeveloping the Old Museum space which closed in 2011. It will transform the Museum of Oxford's facilities developing it as a community hub with the aim being to make the museum a focal point for both local residents and visitors to the city.

4.86 The museum is housed in the centre of Oxford in the Town Hall. The City Council bid for £1.6million. The grant application resulted in the immediate award of £142,000 to fund a detailed development proposal for the project. A detailed development proposal was submitted to the HLF in 2017, which would enable the new museum to open in 2020.

Leisure Centres

4.87 Leisure is a key component for thriving communities. There are five facilities in the city run by the City Council's partner Fusion. Three are leisure centres providing a range of sporting and leisure opportunities including swimming, one is an outdoor heated swimming facility and the other an indoor ice rink. Leisure is being used to drive regeneration with the improvements being made to Blackbird Leys Park. The new pool, fitness trails, sports pavilion and play areas are acting as a catalyst for a broader regeneration programme.

4.88 Along with traditional leisure centre facilities, parks, community centres, children's centres, business premises and community buildings such as churches and village halls all serve as leisure facilities.

4.89 The City Council's Leisure and Wellbeing strategy 2015-2020[17] encompasses physical activity, sport and all activities that take place in

[16] Community Centres Strategy 2016-20, Oxford City Council
[17] Leisure and Wellbeing Strategy 2015-20, Oxford City Council

leisure and outdoor sports facilities. It supports the Corporate Plan which has a target of increasing participation in sport by 1% each year, and covers, amongst other things, the council's plans for the city's leisure centres and its approach to creating a world class leisure offer. The strategy focuses upon sports halls and swimming pools. Gyms are amore simplistic and based on a formula of gym stations per population. Gym provision in the city far exceeds the minimum standards and there are a good range of providers.

Playing Pitches

4.90 Oxford City Council produced a playing pitches strategy to 2026 to support future growth in the city. A new Playing Pitches Strategy is currently being undertaken. This section will be updated once the results of Playing Pitch Strategy have been finalised.

Green Infrastructure

Open Space (Parks and Accessible Greenspace)

4.91 Many of the city's green spaces provide not only un-interrupted views of the city and its iconic landscape but are also integral to the life of the city, making a significant contribution to improving local people's health and well-being. The City Council has produced a Green Spaces Strategy 2013-27[18] and has supplemented it with a Green Infrastructure Study. Both of these documents together provide a picture Oxford's Green Spaces.

4.92 The Green Spaces Strategy 2013-27 identified that Oxford's parks and green spaces are of great significance. Oxford's green spaces support the local economy and have a positive impact on the Oxford's city environment. They act as the city's lungs and are crucial for maintaining and improving people's health and well-being. Oxford's green spaces add to resident's satisfaction with their local area and help bring communities together. Evidence has shown the health benefits of walking every day in a green space, as have the positive impacts of exposure to nature and green space on stress and mental health.

4.93 The purpose of the Green Spaces Strategy is to:

- Protect and improve Oxford's accessible parks and open spaces
- Provide clear objectives and direction for the planning and management of parks and open spaces
- Provide the council with a robust basis for making development decisions and negotiating planning gain
- Identify ways in which parks and open spaces can be improved in a coordinated way whilst providing value for money

4.94 The Green Infrastructure (GI) Study consisted of a three stage process: an audit of Oxford's green spaces to understand current provision; an assessment of the social, environmental and economic functions performed

[18] Green Spaces Strategy 2013-27, Oxford City Council

by Oxford's green spaces and; the identification of a strategic network of green infrastructure.

4.95 The GI Study assessed green spaces, both publicly and privately owned over 0.1ha in size. The types of green spaces included:

- Amenity green space
- Functional green space
- Historic sites
- Natural and semi-natural spaces
- Nature conservation
- Parks

4.96 A number of criteria were used for the assessment of GI Benefits, including, wellbeing (physical and mental health), heritage, sense of place, biodiversity, water management, air quality, tourism, attractive business setting, workforce and resources. Each site was assessed in terms of each criteria and a range of GI features and benefits to provide a network of multi-functional greenspaces for the city.

Allotments

4.97 There are 35 allotment sites currently in active use in Oxford. Whilst the allotments are generally well-used overall, there is some variation between allotment sites with some having a small proportion of vacant plots available and others having a number of people on waiting lists. This may reflect varying supply and demand across the city and the relative attractiveness of different sites to allotment users.

4.98 There is a fairly good spread of allotments in the city, although the South East of the city has the highest concentration and, and would be expected, there are no allotments in the city centre. Allotments tend to be located on the edges of more suburban areas, close to where people live.

Biodiversity

4.99 Oxford is an exceptional place for wildlife and has an impressive range of diverse and rare species and habitats for a city of its size. Oxford's biodiversity is a key part of what makes it a special place to live. Oxford is home to twelve Sites of Special Scientific Interest (SSSIs), some of which make up part of the internationally protected Oxford Meadows SAC, which stretches into Cherwell District Council's administrative area. One of the objectives of the Action Plan associated with Oxford's Biodiversity Strategy 2015-20 is to "promote the benefits of conserving and enhancing our biodiversity resource to local communities…"

4.100 The cost of enhancing a selection of Oxford's biodiversity resource is set out in the Infrastructure Delivery Schedule at the end of this document.

Burial Space

4.101 Oxford City Council owns and operates four cemeteries, all of which were originally developed in the 19th Century as part of the Victorian public health revolution. The cemeteries at Headington and Rose Hill are now full, with the only sites being available for burials now being Botley and Wolvercote. Funds have been identified to go towards provision of additional burial spaces to help meet future need in the Council's Capital Programme.

5. Identified Infrastructure Requirements

5.1 Specific infrastructure requirements have been identified through the Oxfordshire Infrastructure Strategy and from sources including the City Council's capital programme.

5.2 The relevant phasing periods are as follows:

- Phase 1 (Short Term) – 2016-21
- Phase 2 (Medium Term) – 2021-2026
- Phase 3 (Long Term) – 2026-31
- Phase 4 (Very Long Term) – Post 2031

5.3 The Planning Practice Guidance makes clear that, "The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate of and phasing of development". The remaining phases coincide with the county-wide infrastructure work that is being carried out by the Oxfordshire Growth Board.

5.4 The delivery of infrastructure will be monitored in three ways:

a) The delivery of infrastructure will be a requirement of the legal obligation which is monitored to ensure that monies are paid, land transferred or development provided a the correct point in time
b) The Annual Monitoring Report will review the implementation of policies and any delays in delivery will be identified and the reasons investigated if appropriate
c) The Housing Trajectory will highlight if sites are not coming forward as anticipated. If insufficient housing is being delivered, the Council will need to review its housing strategy and whether the provision of infrastructure is holding up housing delivery

Summary of funding availability

5.5 The total infrastructure costs of the projects identified in the table below, which incorporates the Oxford funding set out as part of the Oxford Infrastructure Strategy and bespoke City Council projects.

Sources of funding

5.6 Community Infrastructure Levy (CIL) funding is never expected to be able to fund all infrastructure projects but it will make an important contribution to delivering infrastructure. It is currently estimated (2018) that CIL could generate in the region of £47 million.

Projected S.106 income

5.7 A potential source of income is developer contributions secured via S106 Agreements for infrastructure related on-site mitigation. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to development and related in scale and kind.

5.8 Whilst this potential source of income must be used to fund the specific works related to planning permission, the works might have a secondary effect of improving strategic infrastructure identified in OxIS. For example, a S106 contribution taken to create a cycle path into and through a development site might have a knock on improvement to the strategic cycle network and thus contributing to wider infrastructure projects.

5.9 It is anticipated that a threshold will be used to determine which strategic sites would fall outside the CIL regime and whose infrastructure would be entirely funded through S.106. Northern Gateway is anticipated to fall outside the CIL regime and could secure a significant S.106 contribution.

Housing Growth Deal and the Industrial Strategy

5.10 The Government has announced a housing deal with Oxfordshire[19] to deliver 100,000 homes by 2031 and a joint statutory spatial plan, supported by government investment of up to £215m for infrastructure, affordable housing and local capacity.

5.11 As part of the Growth Deal, the Government has agreed to provide Oxfordshire with a comprehensive funding package of up to £215million to secure the ambitious housing and growth deal. The Government has committed the following:

- Up to £60million for affordable housing
- Up to £150million for funding infrastructure to unlock key housing sites, to be administered £30million per annum for five years
- £5million resource funding to boost capacity to get a joint plan in place and support housing delivery

5.12 The Oxfordshire Infrastructure Strategy will be used to inform where funding will be spent to unlock growth in the county of Oxfordshire so it is likely that a proportion will be spent on projects, both inside and outside the

[19] Housing and Growth Deal for Oxfordshire https://www.oxford.gov.uk/info/20283/oxfordshire_growth_board/1236/oxfordshire_housing_and_growth_deal

city boundary, in order to improve Oxfordshire's infrastructure and accessibility.

National Infrastructure Commission (NIC)

5.13 In March 2016 the National Infrastructure Commission was asked how to maximise the potential of the Cambridge-Milton Keynes-Oxford corridor as a single, knowledge intensive cluster that competes on a global stage, protecting the area's high quality environment, and securing the homes and jobs that the area needs. Interim findings were released in November 2016 and a final report published in November 2017.

5.14 In *Partnering for Prosperity – a new deal for the Cambridge – Milton Keynes – Oxford Arc*[20] the NIC identified opportunities to create well-designed, well connected communities and deliver one million new homes and jobs in the area by 2050. Central to achieving this vision are the completion of the construction of the new East-West Rail line connecting Oxford and Cambridge by 2030 and the construction of the Oxford-Cambridge expressway.

5.15 The Commission's central finding was that rates of house building will need to double if the arc is to achieve its economic potential. This rate of growth, the report stated, would require a new deal between central and local government (the Housing and Growth Deal for Oxfordshire) Infrastructure, particularly transport infrastructure, will be a vital part of this investment package.

5.16 Specific recommendations by the NIC were:

- Government should work with the private sector and the relevant local authorities to agree funding packages and progress schemes to support housing and employment growth now. These should include essential works to enable passenger services between Oxford and Cowley no later than 2019
- Government and local authorities should implement measures to increase certainty on the delivery of growth enabling infrastructure specifically transport plans. These plans should provide a firm basis for long-term growth and investment, and include plans for significantly upgrading public transport, integrating transport hubs and providing safe cycling infrastructure.

5.17 The NIC study specifically refers to the Cowley branch line and improvements to transport hubs and cycling infrastructure. All of which are idenfied in OxIS. Therefore if funding were received through the NIC, this would support the delivery of these projects.

[20] https://www.nic.org.uk/publications/partnering-prosperity-new-deal-cambridge-milton-keynes-oxford-arc/

Business Rates

5.18 Local authorities can retain a proportion of business rates revenue as well as growth on the revenue that is generated. The scheme could be used to meet the cost of infrastructure as and when the revenue is received, or it could be used to raise finance to meet upfront infrastructure costs. In Oxfordshire, proposals for pooling Business Rates income to deliver infrastructure is being considered.

Other options for funding

5.19 OxIS (Nov 2017) sets out selected options for additional infrastructure funding in Table 1.44[21]. This table is reproduced below.

Description		Project Types	Maturity	Positive Attributes	Negative Attributes
Prudential Borrowing	Loans at low rates from the Public Works Loan Board (PWLB) under prudential principles	**Any**	**Mature**	Low Rates Reliable Prudential approach determined by local authorities	Availability of revenue funding to repay the loan Political appetite for borrowing
Local Authority Bonds	A fixed- interest bond, repayable on a specific date, used by a local authority in order to raise a loan and similar to a Treasury bond. Could be used as part of a TIF scheme.	**Any**	Re-emerging with the implementation of a UK Municipal Bonds Agency	Reliable Stable repayment amounts over time	Ability to repay the loan
Business Rate Retention (BRR)	Local authorities can retain a proportion of business rates revenue as well as growth on the revenue that is generated. The scheme could be used to meet the cost of infrastructure as and when the revenue is received, or it could be used to raise finance to meet upfront infrastructure costs.	**Any**	Emerging	No cost for the local authority	Use of funds from BRR for infrastructure must be weighed against other local authority needs Allocation issues if cross-boundary receipt
Tax increment financing (TIF)	Enables local authorities to borrow against the value of the future uplift in order to deliver	Sites / areas where substantial business rate growth is a realistic	Emerging	Prudential System	Ability to repay dependent on achievement of predicted growth in value

[21] https://www.oxfordshiregrowthboard.org/projects/oxis-stage-2/

Description		Project Types	Maturity	Positive Attributes	Negative Attributes
	the necessary infrastructure (usually based on BRR)	prospect.			
Local asset backed vehicle	Local Asset-Backed Vehicles (LABVs) allow local authorities to use their assets (usually land) to lever long-term investment from the private sector for regeneration projects.	Contaminated or under-developed urban areas; housing projects.	Developing	Unlocking value from previously undeveloped / unused local assets. Brings in funding and expertise from private sector to develop the asset.	Need to securing political buy-in. Difficulty and cost of implementation: working across a range of partners; managing risks; stakeholder engagement; operation costs; procurement and legal requirements.
Strategic Asset Management	Maximising the contribution of local authority assets as sources of long-term funding through a combination of: refurbishing and repurposing buildings in order to make better use out of them and ready them for sale; selling off to generate receipts, or liabilities to reduce costs; acquiring new assets to meet local council or civic needs, to deliver where the market cannot or to grow the investment portfolio.	Revenue from SAM can be used for any purpose	Mature	Limited costs Maximises value of local authority assets Facilities working across the public sector locally Some dedicated funds to support (e.g. Open Public Estate)	Difficulty in aligning objectives of different public sector owners Need to adopt an entrepreneurial approach, working to commercial timescales and accepting risk Tensions and trade-offs between short-term financial gain and longterm economic growth benefit
European Funding	A range of EU funds are accessible to local authorities in the forms of loans, grants or equity funding. The main source is the 'EU Structural Investment Funds (ESIF) Growth Programme' made available to Local	Projects meeting eligibility criteria e.g. for ERDF, projects relating to Innovation, ICT, SME competitiveness, Low Carbon, Climate Change Adaptation, Environmental Protection	Mature	Provides additional source of funding to national / local streams. This is one of the criteria for eligibility	Requires match-funding. There may not be a pipeline of projects ready to apply for funding The quality of proposals may not be sufficiently high. Uncertainty of the impact of Brexit on UK access to EU funds (and national

Description		Project Types	Maturity	Positive Attributes	Negative Attributes
	Enterprise Partnerships. Also discounted borrowing through EIB for major schemes (e.g. light rail)				successor funding) beyond 2020.
Housing Infrastructure Fund	The fund offers repayable finance for upfront infrastructure investment and other site preparation works that will support economic growth, jobs and homes.	Any	Mature	Additional funding for site-based development	Limited life cycle and strict eligibility criteria
New Homes Bonus	The New Homes Bonus is a grant paid by central government to local councils to reflect and incentivise housing growth in their areas. It is based on central government match funding the Council Tax raised for new homes and properties brought back into use, with an additional amount for affordable homes, for the following six years	Local Councils can decide how to spend the NHB	Mature	Clear financial incentive for local authorities to permit new housing Bonus is relatively easy to calculate	Limited impact on planning applications and decisions Uncertainty about the long-term future of the policy
Private Finance Initiative	Under a PFI, the private sector will typically design, build, finance and maintain infrastructure facilities under a longterm contract. The public sector body which uses the infrastructure repays the debt over a long period, often 25-30 years.	Generally linked to buildings (e.g. schools, hospitals)	Mature	Enables a local authority to embark on large capital projects with little upfront commitment of resources	Higher costs and risks than conventional funding Business case for PFI can be weak Local authority's ability to manage risk and achieve appropriate contract
Local	The Local	Any	Emerging	Source of	Scope for

Description		Project Types	Maturity	Positive Attributes	Negative Attributes
Government Pension Funds	Government Pension Scheme (LGPS) is a funded, statutory, public service pension scheme. The LGPS may be able to invest part of its fund in supporting the development of local communities across the UK.			investment with a long-term view and interest in the UK infrastructure market	involvement of LGPS currently evolving
Institutional Investors	Sovereign wealth funds and pension funds show a growing interest in the UK infrastructure market as a place to invest	Any	Emerging	Large operators with long-term view of investment.	Likely limited potential as infrastructure debt competes for attention with other asset classes Has to perform against other competing assets classes on risk / reward basis
Crowd funding	Funding a project or venture by raising monetary contributions from a large number of people, typically via the internet.	Small projects (e.g. community gardens)	Emerging	Direct link with local population and their need Ability to address gaps in funding for small projects which contribute to well-being and sense of place Dynamic and grass-rooted	Small-scale funding

Appendix 1: Infrastructure Delivery Schedule

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Physical Infrastructure								
City centre traffic access restrictions	OxIS	Ensuring Efficient Movement	City Centre	£200,000		£200,000	Oxfordshire County Council	2021-2031
Workplace Parking Levy and/ or Congestion Charge	OxIS	Ensuring Efficient Movement	Oxford	£7,000,000	Borrowing against future income from scheme	£7,000,000	Oxfordshire County Council	2021-2026
Gloucester Green Bus Terminal Phase I	OxIS	Ensuring Efficient Movement	City Centre	£800,000		£800,000	Oxford City Council	2021-2026
Gloucester Green Bus Terminal Phase II	OxIS	Ensuring Efficient Movement	City Centre	£8,000,000		£8,000,000	Oxford City Council	2021-2031
Peartree P&R Extension	OxIS	Ensuring Efficient Movement	North Oxford	£8,100,000		£8,100,0000	Oxford City Council	2016-2021
Redbridge P&R Extension	OxIS	Ensuring Efficient Movement	South Oxford	£8,100,000		£8,100,000	Oxford City Council	2016-2021
Seacourt P&R Extension	OxIS	Ensuring Efficient Movement	West Oxford	£4,100,000	£4,100,000	£0	Oxford City Council	2016-2021
A40 (Eynsham)	OxIS	Ensuring	West	£35,000,000		£35,000,000	Oxfordshire	2016-

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
P&R and Bus Lane		Efficient Movement	Oxfordshire DC and North Oxford				County Council	2021
A40 (Thornhill P&R Expansion)	OxIS	Ensuring Efficient Movement	South Oxfordshire DC	£2,800,000		£2,800,000	Oxfordshire County Council	2021-2026
A420 (Cumnor) P&R	OxIS	Ensuring Efficient Movement	Vale of White Horse	£11,300,000		£11,300,000	Oxfordshire County Council	2026-2031
A34 South (Lodge Hill) P&R and Bus Lane	OxIS	Ensuring Efficient Movement	Vale of White Horse	£40,000,000		£40,000,000	Oxfordshire County Council	2026-2031
A4074 (Sandford) P&R and Corridor Improvements	OxIS	Ensuring Efficient Movement	South Oxfordshire DC and South Oxford	£31,200,000		£31,200,000	Oxfordshire County Council	2026-2031
A44 (London Oxford Airport) Corridor Improvements	OxIS	Ensuring Efficient Movement	Predominantly Outside City Boundary	£46,000,000		£46,000,000	Oxfordshire County Council	2021-2026
Controlled Parking Zones (city-wide)	City/ County Capital Programmes	Ensuring Efficient Movement	City-wide	£861,000	£861,000	£0	Oxfordshire County Council	2016-2036
Abingdon Road Corridor Improvements	OxIS	Ensuring Efficient Movement	South Oxford	£13,700,000		£13,700,000	Oxfordshire County Council	2021-2026
Botley Road Corridor Improvements	OxIS	Ensuring Efficient Movement	West Oxford & Vale of White Horse	£13,000,000	£9,100,000	£3,900,000	Oxfordshire County Council	2021-2026

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Banbury Road Corridor Improvements	OxIS	Ensuring Efficient Movement	City Centre/ North Oxford	£9,700,000		£9,700,000	Oxfordshire County Council	2021-2026
Woodstock Road Corridor Improvements	OxIS	Ensuring Efficient Movement	City Centre/ North Oxford	£9,100,000		£9,100,000	Oxfordshire County Council	2021-2026
Iffley Road Corridor Improvements	OxIS	Ensuring Efficient Movement	East Oxford	£19,600,000		£19,600,000	Oxfordshire County Council	2026-2031
B4495 Corridor Improvements (Hollow Way/ Between Towns Road/ Donnington Bridge)	OxIS	Ensuring Efficient Movement	East Oxford	£22,000,000		£22,000,000	Oxfordshire County Council	2021-2031
Botley Interchange and Approaches	OxIS	Ensuring Efficient Movment	Vale of White Horse	£10,000,000	£4,000,000	£6,000,000	Highways England/ Oxfordshire County Council	2016-2026
Cowley Road/ Garsington Road/ Watlington Road Corridor Improvements	OxIS	Ensuring Efficient Movement	Oxford South East	£45,000,000		£45,000,000	Oxfordshire County Council	2021-2031
London Road Corridor Improvements	OxIS	Ensuring Efficient Movement	Headington	£10,000,000		£10,000,000	Oxfordshire County Council	2026-2031

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
John Radcliffe Hospital on-site bus interchange & priority measures	OxIS	Ensuring Efficient Movement	Headington	£3,000,000		£3,000,000	Oxfordshire County Council	2021-2026
Churchill Hospital additional bus & cycle access	OxIS	Ensuring Efficient Movement	Headington	£2,000,000		£2,000,000	Oxfordshire County Council	2021-2026
Headington Roundabout phase II (incl. Collingwood Road)	OxIS	Ensuring Efficient Movement	Headington	£6,100,000		£6,100,000	Oxfordshire County Council	2016-2026
Eastern Bypass corridor improvements (incl. Littlemore Rbt & Heyford Hill)	OxIS	Ensuring efficient movement		£38,100,000		£38,000,000	Oxfordshire County Council	2026-2031
Northern Bypass corridor improvements (Cutteslowe Rbt. to Mash Lane)	OxIS	Ensuring Efficient Movement		£25,800,000		£25,800,000	Oxfordshire County Council	2026-2031
Hinksey Interchange	OxIS	Ensuring Efficient Movement	South Oxford	£8,700,000	£8,700,000	£0	Oxfordshire County Council	2016-2021
Horspath Road	OxIS	Ensuring	Headington	£4,100,000	£0	£4,100,000	Oxfordshire	2016-

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Junction Improvements		Efficient Movement					County Council	2021
Kidlington roundabout	OxIS	Ensuring Efficient Movement	Cherwell DC	£2,500,000		£2,500,000	Oxfordshire County Council	2021-2031
Northern Gateway site-link road	OxIS	Ensuring Efficient Movement	North Oxford	£6,000,000	£6,000,000	£0	"Oxford North"	2016-2021
Peartree Interchange	OxIS	Ensuring Efficient Movement	North Oxford	£4,000,000	£0	£4,000,000	Oxfordshire County Council	2016-2021
A40-A44 Strategic Link Road	OxIS	Ensuring Efficient Movement	Cherwell DC/ North Oxford	£9,600,000	£9,600,000	£0	Oxfordshire County Council	2021-2026
City Centre Corridor Improvements (West – Hythe Bridge St/ Oxpens Rd/ George St/ New Road	OxIS	Ensuring Efficient Movement	City Centre	£10,000,000	£0	£10,000,000	Oxfordshire County Council	2021-2026
City Centre Corridor Improvements (North – St Giles/ Magdalen St/ Broad St	OxIS	Ensuring Efficient Movement	City Centre	£13,000,000	£0	13,000,000	Oxfordshire County Council	2021-2026
City Centre Corridor	OxIS	Ensuring Efficient	City Centre	£8,000,000	£0	£8,000,000	Oxfordshire County Council	2021-2026

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Improvements (South & East – High St/ St Aldates)		Movement						
Queen Street Pedestrianisation	Oxford City Council Capital Programme	Ensuring Efficient Movement	City Centre	£500,000	£500,000	£0	Oxford City Council/ Oxfordshire County Council	2016-2021
Cycle Hire Stations	OxIS	Ensuring Efficient Movement	Various	£2,000,000	£0	£2,000,000	Oxfordshire County Council	2016-2031
District Centre Improvements (Cowley Centre/ Blackbird Leys/ Headington/ St Clements/ Summertown	OxIS	Ensuring Efficient Movement	Various	£6,900,000	£0	£6,900,000	Oxfordshire County Council	2016-2026
Oxpens to Osney Mead bridge over rail line and river	OxIS	Ensuring Efficient Movement	City Centre	£15,000,000	£0	£15,000,000	Oxfordshire County Council	2021-2026
Zero Emission Zone (Phase I) Central Core	OxIS	Wise Use of our Resources	City Centre	£2,900,000	£0	£2,900,000	Oxfordshire County Council	2021-2026
Cowley Branch Line	OxiS	Ensuring Efficient Movement	Cowley	£450,000,000	£500,000	£449,500,000	Network Rail	2026-2031
Oxford Railway	OxIS	Ensuring		£125,000,000	£0	£125,000,000	Network Rail	2016-

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Station		Efficient Movement						2026
Freight Restrictions	OxIS		City Wide	£50,000	£0	£50,000	Oxford City Council	2021-2031
Energy								
A section of the 132kV cable at Osney Lane Bulk Supply Point (BSP) will need to be uprated by 2023	OxIS	A vibrant and enjoyable city providing facilities and services		TBC			SSE	2016-2026
North Hinksey primary transformers will require replacement by 2026	OxIS	A vibrant and enjoyable city providing facilities and services		TBC			SSE	2016-2026
Waste Water								
Oxford Waste Water Treatment Works (WWTW) upgrade	OxIS	Providing facilities and services	Littlemore	TBC			Thames Water	2026-2036
Waste								
Waste Transfer Station (Redbridge)	Oxford City Capital Programme	Providing facilities and services		£2,400,000		£2,400,000	Oxford City/ Oxfordshire County Councils	2021-2026

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Flood Defences								
Oxford Flood Alleviation Scheme	OxIS	Wise use of our resources and good quality environment		£120,000,000	£120,000,000	£0	Environment Agency	2016-2026
Boundary Brook Catchment (Florence Park) Flood Alleviation	OXis	Wise use of our resources and good quality environment					Environment Agency	2016-2021
Education								
Extensions to primary schools equivalent to 1FE, to cater for Oxford North and cumulative sites	OxIS	Providing facilities and services	North Oxford	TBC				2016-2026
New 1.5FE Primary School to service Barton Park	OxIS	Providing facilities and services	Headington		Fully Funded			2016-2021
New 1,200 Pupil Secondary School (Swan School) to serve Oxford growth	OxIS	Providing facilities and services		TBC	Fully Funded			2016-2026
Health & Social Care								
Enhanced	OxIS	Providing			Fully funded			2016-

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
community-based care for Headington/ Barton incl. GP		facilities and services						2021
New City Centre GP provision to replace/ enhance Beaumont Street		Providing facilities and services		TBC				
New Health Centre in Summertown		Providing facilities and services		TBC				
Community Centres								
East Oxford Community Centre	Oxford City Capital Programme	A vibrant and enjoyable city providing facilities and services	East Oxford	£2,000,000	£2,000,000	£0	Oxford City Council	2016-2026
Jericho Community Centre	Oxford City Community Centres Strategy	A vibrant and enjoyable city providing facilities and services	Jericho	£200,000	£200,000	£0	Oxford City Council	2016-2026
Blackbird Leys Regeneration (New Community Hub)	Oxford City Community Centres Strategy	A vibrant and enjoyable city providing facilities and services	Blackbird Leys	£550,000	£0	£550,000	Oxford City Council	2016-2026
Barton Community	Oxford City Community	A vibrant and enjoyable city		£950,000	£0	£950,000	Oxford City Council	2016-2026

Project Title	Source	Local Plan 2036 theme	District Area	Estimated Capital Cost	Funding	Shortfall	Delivery Agency	Phasing
Centre	Centres Strategy	providing facilities and services						
Green Infrastructure								
Green Infrastructure for Healthier Lives in Oxford	OxIS	Protecting and enhancing Oxford's green setting	City-wide	£235,000	£0	£235,000	Centre for Sustainable Healthcare	2016-2021
Horspath Sports Park	Oxford City Capital Programme			£4,900,000	£4,900,000	£0	Oxford City Council	2016-2021
New Burial Space	Oxford City Council Capital Programme			£950,000	£950,000	£0	Oxford City Council	2016-2021
Biodiversity enhancements	Oxford City Biodiversity Enhancements Programme	Protection and enhancing Oxford's green setting		£160,000	£0	£160,000	Oxford City Council	2016-2036

Oxford City Council

CONSULTATION STATEMENT
Summarising the Local Plan 2036 Preferred Options (Regulation 18) Consultation

October 2018

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1. Introduction

The Oxford Local Plan 2016-2036 sets out how we want the city to look and feel. It will guide new developments to the right locations while protecting and improving the environment and people's quality of life. It will deliver the new homes, businesses, jobs, shops and infrastructure needed to support the growth of Oxford over the next 20 years and it will be used in determining planning applications and to guide investment decisions across the city.

The current report demonstrates how planning officers have taken account of the public feedback to the preferred options as received during the Regulation 18 consultation, and how the proposed submission draft has been shaped in response.

The report covers:

(i) An overview of the Preferred Options consultation, including which bodies and persons were invited to make representation and how they were consulted;
(ii) A summary of the received responses to the preferred options; and,
(iii) A demonstration of how the proposed submission draft has been shaped in response to the public feedback.

The next stages for the emerging local plan are as follows:

Proposed Submission consultation (programmed for Autumn 2018)

Following the analysis of comments received during the Preferred Options Consultation, we have produced the Proposed Submission Draft. We will consult on this for a period of 6 weeks between 1st November and 13th December 2018. Comments in relation to this must be received in writing (or by email) as they will be submitted to the Secretary of State.

Examination (programmed for Summer/ Autumn 2019)

Following the Proposed Submission consultation, there is an opportunity to make minor changes to the Local Plan in response to the comments made, before the document, evidence base and comments received are submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the Proposed Submission Document have the right to ask the Inspector to be heard in person at the examination. If the document is found sound, changes recommended by the Inspector are made and the document is taken to Full Council to formally adopt it.

Engagement throughout the Local Plan process

Involvement of local communities and other stakeholders from the outset in the preparation of planning policy documents has been a key priority for the council. The main stages of consultation to date on the Oxford Local Plan 2016-2036 are as follows:

- Preparatory Work (2016)
- First Steps consultation (June - August 2016)
- Preferred Options (Regulation 18) consultation (30th June and 25th August 2017)

First Steps consultation (June-August 2016)

Preparatory work on the Local Plan began in January 2016. Officers began to meet with a range of stakeholders and interest groups to commence conversations on the project. This has included the

Universities (and larger colleges), the Environment Agency, Highways Agency, Historic England, Natural England, Thames Water, Oxfordshire County Council and others.

A First Steps consultation was held in the Summer of 2016 with the aim of involving as many people as possible early in the process of producing a new Local Plan. This stage is not a statutory stage of consultation; it is in addition to the formal requirements. This additional stage was incorporated into the project timetable because it was felt that early engagement, before any policy approaches are drafted, is the best time to engage people so that they can really shape the plan. The City Council was also keen to involve those who might not normally engage with planning and so instead of using (simply) traditional consultation methods, sought to use social media and to go out to meet people in their everyday lives rather than expecting them to come to a specific consultation event. With this in mind the Local Plan team attended a variety of events that were already arranged across the city such as the Leys Festival and the Cowley Road Carnival.

2. Preferred Options consultation process

a. Who was consulted and how?

1.1. The City Council conducted an extensive consultation exercise over the Summer of 2017 to publicise the project and engage the Oxford community in the Preferred Options Stage of the plan making process. The Preferred Options consultation aimed to involve residents, workers, employers, students and visitors to Oxford as well as stakeholders and service providers.

The Preferred Options consultation aimed to involve the whole city by delivering a questionnaire door-to-door across the city (approximately 60,000 properties). Letters were sent to various organisations and individuals, which included the statutory stakeholders and a wide range of interest groups, developers and agents.

Direct contact with the following individuals or organisations was made either by email or letter:

- Door-to-door delivery across the city (approximately 60,000 households)
- Statutory consultees (42 statutories) (see **Appendix 1**)
- Those on the City Council's online consultation database with an interest in Planning and Regeneration
- Additional local groups and organisations who were likely to be interested (250) (see **Appendix 2**)
- Respondents from the First Steps Consultation who wished to be kept informed of further stages in the Local Plan process (250)

b. Consultation methods

At this stage in the Local Plan project the material that was published was focussed on presenting the preferred policy options, and providing the evidence base that had led to the development of the policy options and to the preferences for those options. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a ranges of materials were produced with different audiences in mind:

For people with 5-10 minutes to get involved:

- Leaflet (equivalent 2 sides of A3) with basic information and simple 'Strongly Agree – Strongly Disagree' questionnaire with a freepost reply
- Social media comments could be left in relation to videos and short posts

For stakeholders and those with more interest/time:

- Local Plan Preferred Options Document
- Draft Sustainability Appraisal
- Background Papers
- Green Belt Study
- Structured online questionnaire to comment on Preferred Options Document (in addition to option of submitting written feedback on the council website, by email or by post)

The materials described above were available:

- On the Council's website
- In St Aldate's Customer Service Centre
- In 7 local libraries and the central library
- On request

In addition to being delivered to every household in the city, the leaflet was made available:

- In 7 local libraries and the central library
- In St Aldate's Customer Service Centre and the Town Hall
- In 30 community or leisure centre locations

The Preferred Options Consultation was publicised through the following channels:

- The LDS was published before the First Steps consultation and shows when each consultation stage will take place. The First Steps consultation also included information on the next stage (Preferred options)
- Early engagement with interest groups, including through the planning User Group, who were informed of the upcoming consultation in January 2017
- Attendance at local groups and forums, eg a jointly organised Civic Society/Planning User Group forum
- Notifying those on the City Council's online consultation database (all those interested in planning or other relevant topics- 400+)
- Notifying statutory consultees and Duty to Cooperate bodies
- Notifying residents groups and amenity groups
- Publishing information on our webpage (including introductory videos)
- The City Council's social media channels (Facebook and Twitter including paid adverts on Facebook)
- A press briefing with the Oxford Times
- Posters distributed to all community noticeboards in the city
- Electronic adverts inside Oxford Bus Company buses during the first week of the consultation
- Your Oxford published on 9th June and distributed to households across the city
- Mailouts from community and amenity groups to their own members
- Local members

The Preferred Options document was approved by City Executive Board on 15th June 2017. Before that meeting it was considered at Scrutiny Committee on 12th June.

Drop-in events were held at the following times and venues. These were widely advertised through the posters displayed on all community notice boards, as well as on our website, on electronic adverts inside Oxford Bus Company buses during the first week of the consultation and mentioned at meetings held before and during the consultation.

Sun 2nd July:	Cowley Road Carnival **11-5; Cowley Road**	Sun 23rd July:	Summertown Farmers Market **10-2; Banbury Road**
Sat 8th July:	Leys Festival **12-4; Blackbird Leys Park**	Fri 4th August:	Templars Square Shopping Centre **11-1.30**
Sun 9th July:	Race for Life **10-4; University Parks**	Sun 6th August:	West Oxford Community Café/Centre **11-1.30**
Mon 10th – Fri 14th July:	Pop-up shop **11-2; Ship Street**	Sat 12th August:	Town Hall Drop-in Session **11-1.30; Long Room, Town Hall**
Sat 15th July:	Headington Funday **2-5; Bury Knowle Park**	Sun 13th August:	Cowley Classic Car Show **11-5; Cutteslowe Park**
Sun 16th July:	South Oxford Farmers Market **9.30-12; Lake Street**	Sat 19th August:	Elder Stubbs Festival **11-5; Elder Stubbs Allotments**

3. Format of this report

The report is arranges the preferred options according to chapters, each of which corresponds to the structure of the proposed submission draft. For each option, there are graphs showing the number of comments received in strong agreement, agreement, neutral, disagreement or strong disagreement. These are taken from the full comment forms (blue bar graphs) and also from the short leaflets (green bar graphs).

Beneath the graphs there is an additional comments box containing comments received from the leaflet, the full online comment form and in freeform letters and emails sent directly to the Planning Policy team. These comments were often made in addition to responders completing the questionnaires, but not always. It should be noted that the numbers referred to in this box only relate to the number of additional comments made in relation to each option; these numbers are independent of the numbers shown in the graphs (which reflect the results of the questionnaire element of the comment form and leaflet).

The additional comments box is followed by a Council response box. This contains the council's response to the received feedback including a discussion of how they have informed any changes. It also shows the relevant policies that correspond to the preferred option within the proposed submission draft.

4. Layout of report

Preferred Option (PO)	Proposed Submission Draft Chapter	Pages

Opt 1: Protecting Category 1 employment sites Opt 2: Protecting Category 2 employment sites. Opt 3: Making best use of Category 3 employment sites Opt 4: Controlling low density B8 uses Opt 5: Teaching and research Opt 6: Sites for small businesses and start-up spaces for other employment uses (e.g. creative industries, virtual offices) Opt 7: New academic floor space for Private Colleges/language schools Opt 8: Opportunities for local employment, training and businesses	**C2**. Building on Oxford's economic strengths and ensuring prosperity and opportunities for all	10 – 17
Opt 9: Overall housing target for the plan period Opt 10: Determining the priority types of Affordable Housing Opt 11: Determining the approach to setting the level of the Affordable Housing requirement Opt 12: Meeting intermediate housing or employment sector specific needs based on local affordability approaches Opt 13: Providing affordable housing from larger sites Opt 14: Affordable housing financial contributions from small sites Opt 15: Contributions towards affordable housing from other development Opt 16: Mix of dwelling sizes to maintain and deliver balanced communities ('balance of dwellings') Opt 17: Thresholds for mix of dwelling sizes ('balance of dwellings') Opt 18: Change of use from existing homes/loss of dwellings Opt 19: Houses in Multiple Occupation (HMOs) Opt 20: Linking the delivery of new University academic facilities to the	**C3.** Creating a pleasant place to live, delivering housing with a mixed and balanced community	18 – 37

delivery of University provided residential accommodation Opt 21: New student accommodation Opt 22: Affordable housing financial contributions from small sites Opt 23: Accommodation for travelling communities Opt 24: Homes for Boat Dwellers Opt 25: Privacy and daylight Opt 26: Housing internal space standards Opt 27: Outdoor space standards Opt 28: Accessible and adaptable homes		
Opt 29: Making use of previously developed land Opt 30: Density and efficient use of land Opt 31: Green Belt Opt 32: Energy efficient design and construction Opt 33: Carbon reduction in non-residential development (demonstrated through BREEAM) Opt 34: Carbon reduction from residential development (not mutually exclusive) Opt 35: Sustainable Retrofitting of Existing Buildings Opt 36: Water efficiency (residential) Opt 37: Community energy schemes, heat networks and Combined Heat and Power (CHP) Opt 38: Flood risk zones Opt 39: Flood risk assessment Opt 40: Sustainable drainage Opt 41: Surface and groundwater flow and groundwater recharge Opt 42: Health Impact Assessment Opt 43: Air quality assessments Opt 44: Air Quality Management Area Opt 45: Protection of future	**C4.** Making wise use of our resources and securing a good quality local environment	38 – 56

occupants against nuisances such as noise and light Opt 46: Lighting and light pollution Opt 47: Noise and noise pollution Opt 48: Contaminated land		
Opt 49: Managing the overall amount of Public Open Space in Oxford Opt 50: Creating a green infrastructure policy designation Opt 51: Securing net gain in Green Infrastructure provision, particularly public access to open spaces Opt 52: Ensuring that new developments improve the quality of Green Infrastructure Opt 53: Biodiversity sites, wildlife corridors. Species protection independent ecological assessment (accounting) Opt 54: Playing pitches Opt 55: Allotments Opt 56: Protecting and promoting watercourses – Making more of blue infrastructure Opt 57: Species enhancement in new developments Opt 58: Trees affected by new development Opt 59: Green/brown roofs and walls Opt 60: Enhanced walking and cycling connections	**C5.** Making wise use of our resources and securing a good quality local environment	57 – 68
Opt 61: Creating successful places Opt 62: Responding to Oxford's character and site context Opt 63: Creating an integrated high quality public realm and setting of buildings Opt 64: Secure by design Opt 65: High quality design of new buildings Opt 66: Building heights Opt 67: Altering existing buildings Opt 68: Shopfronts and signage	**C6.** Enhancing Oxford's unique heritage and creating quality new development	69 – 84

Opt 69: Stores for bikes, waste and recycling Opt 70: High Buildings, view cones and high building area Opt 71: Listed buildings and their setting Opt 72: Assets of Local Heritage Value Opt 73: Conservation areas Opt 74: Important parks and gardens Opt 75: Scheduled Monuments Opt 76: Defining areas likely to have archaeological deposits Opt 77: Provisions for sites that include archaeological remains Opt 78: Archaeological remains within listed buildings		
Opt 79: Transport Assessments and Travel Plans (include servicing and delivery plans) Opt 80: Supporting city-wide pedestrian and cycle movement Opt 81: Supporting walking, cycling and public transport access to new developments Opt 82: Tourist coaches Opt 83: Scheduled coaches (i.e. long distance coaches to London and the airports) Opt 84: Safeguarding Cowley Branchline Opt 85: Car parking standards – residential Opt 86: Car Parking standards – non-residential Opt 87: Controlled parking zones (CPZ) Opt 88: Cycle parking standards – residential Opt 89: Cycle parking standards – non-residential Opt 90: Off-street public car parking Opt 107: Area Action Plans	**C7.** Ensuring efficient movement into and around the city	85 – 96

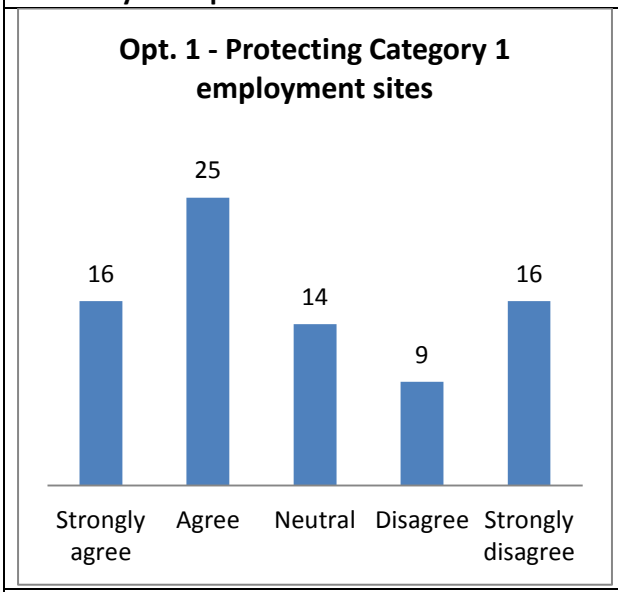
Opt 91: Hierarchy of centres for town centre uses Opt 92: Widening the role of district centres Opt 93: The "sequential approach" and "sequential test": location of town centre uses Opt 94: "Impact Assessment": threshold for requiring an impact assessment for applications for town centre uses that are not located in existing centres Opt 95: Primary and Secondary Shopping Frontages of the city centre Opt 96: Primary and Secondary Shopping Frontages of district and local centres Opt 97: Evening economy: cultural and social activities Opt 98: Tourist/Visitor attractions Opt 99: Short-stay accommodation (hotels and guest houses) Opt 100: Infrastructure and developer contributions Opt 101: Delivering High Quality Ubiquitous Digital Infrastructure Opt 102: Waste water and sewerage infrastructure Opt 103: Access to education (state primary and secondary schools) Opt 104: Primary healthcare services Opt 105: Community facilities Opt 106: Pubs	**C8.** Providing communities with facilities and services and ensuring Oxford is a vibrant and enjoyable city to live in and visit	97 – 112

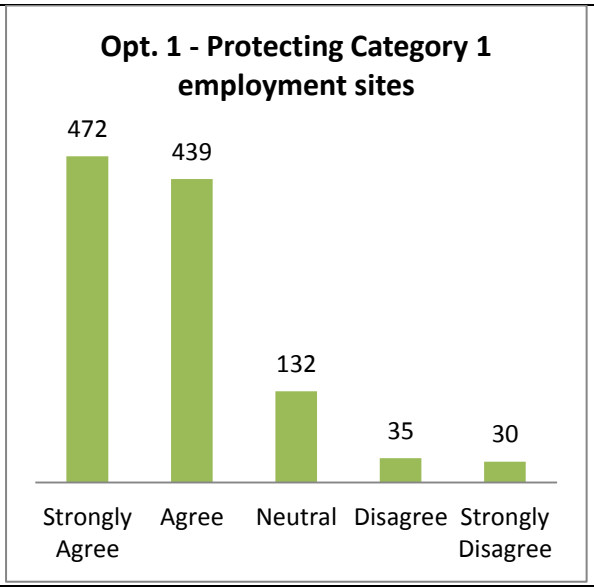
5. Analysis of comments and council response

C2: Building on Oxford's economic strengths and ensuring prosperity and opportunities for all

Opt. 1: Protecting category 1 employment sites

Summary of responses to PO





Additional Comments

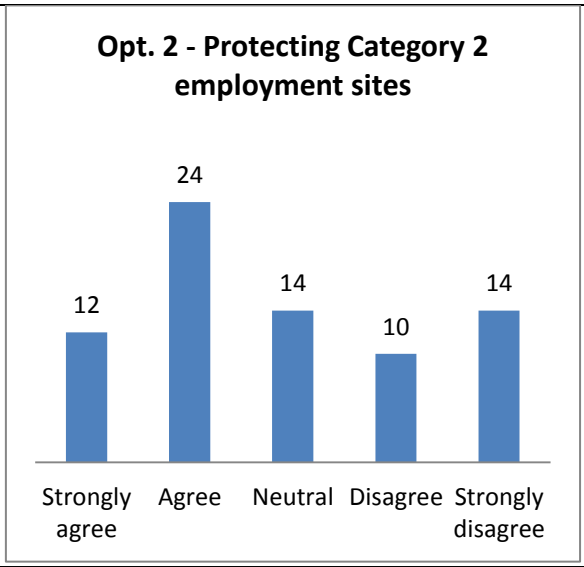
There were a few additional comments about what further uses should be allowed on these sites, a few saying housing and others saying definitely not housing. Some comments referred to particular sites that should or shouldn't be in the list of category 1 sites. A few commenters preferred option B or wanted a combination of A and B. Some comments said some of these employment sites are ideal for housing.

How these comments were taken into account in the proposed submission draft

Policy E1 of the PROPOSED SUBMISSION DRAFT addresses in detail the employment sites in the city. The hierarchy of employment sites as used in the DRAFT was informed by an Employment Land Assessment in conjunction with previous economic studies and input from property agents. These are expanded within the DRAFT and background information. Category 1 and 2 sites are identified in an appendix. The main preferred option is reflected in the policy and as such there is restricted flexibility on the uses that will be supported on category 1 sites due to their high level of importance to the local economy.

The development of other uses is closely restricted to those that directly support the main economic function of the site, start-up businesses and employment linked housing (subject to Policy H3) and as long as there is no loss of floorspace.

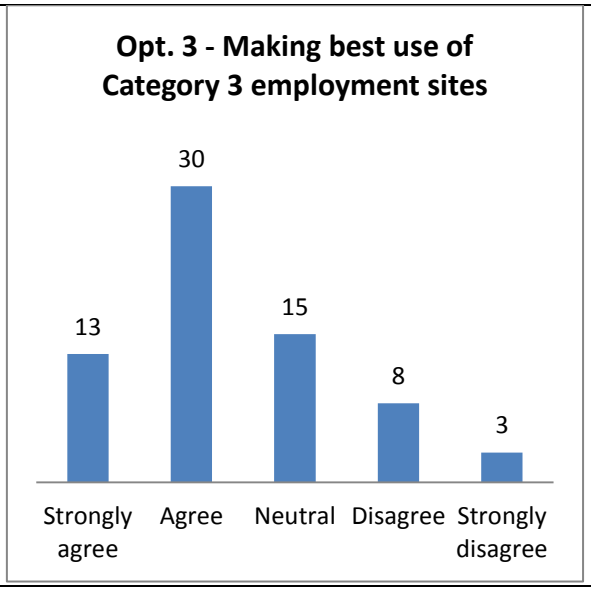
Opt. 2: Protecting category 2 employment sites

Summary of responses


Additional comments
There was some support for this PO although the majority of comments were concerned that some sites were being protected at the expense of providing sites for housing. A mix of employment and housing on the same site should be considered in some instances. Some questioned the value of some of the sites listed as Category 2 sites.

How these comments were taken into account in the proposed submission draft
The hierarchy of employment sites as used in the PROPOSED SUBMISSION DRAFT was informed by an Employment Land Assessment in conjunction with previous economic studies and input from property agents. These are expanded within policy E1 and background supporting information. Category 1 and 2 sites are identified in an appendix. Category 2 sites are subject to a lower level of protection than category 1 sites although they provide an important diversity of employment opportunities in the city. However there is scope for the development of other uses on such sites, including housing or community uses, subject to compliance with specified criteria within the policy.

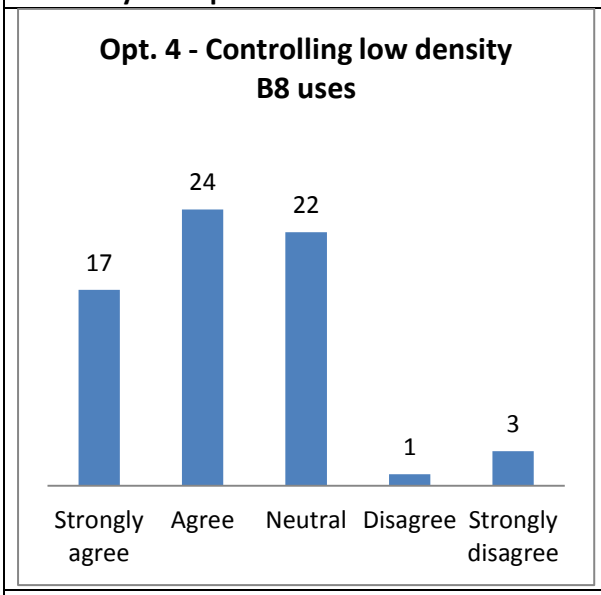
Opt. 3: Making best use of category 3 employment sites

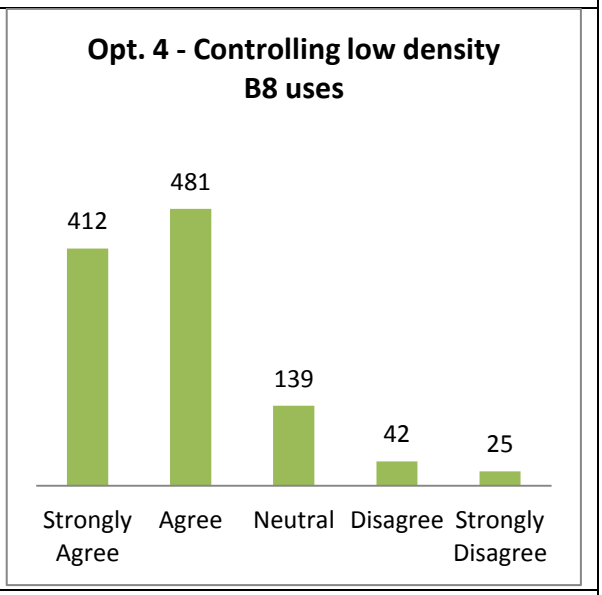
Summary of responses

Additional Comments
Although there was some support for this PO it was recognised that the Category 3 sites are offering employment to non-graduate Oxford residents and should be protected. In addition, these sites often offer opportunities for new start-up companies to find sites. A mix-used neighbourhood adds more vibrancy to a community.

How these comments were taken into account in the proposed submission draft
The hierarchy of employment sites as used in the proposed submission draft was informed by an Employment Land Assessment in conjunction with previous economic studies and input from property agents. These are expanded within policy E1 and background supporting information. Whilst category 3 sites are on the lowest hierarchy of protection, any development resulting in the loss of employment space must still be justified by evidence of lack of use or unsuitability.

Opt. 4: Controlling low density B8 uses

Summary of responses





Additional comments

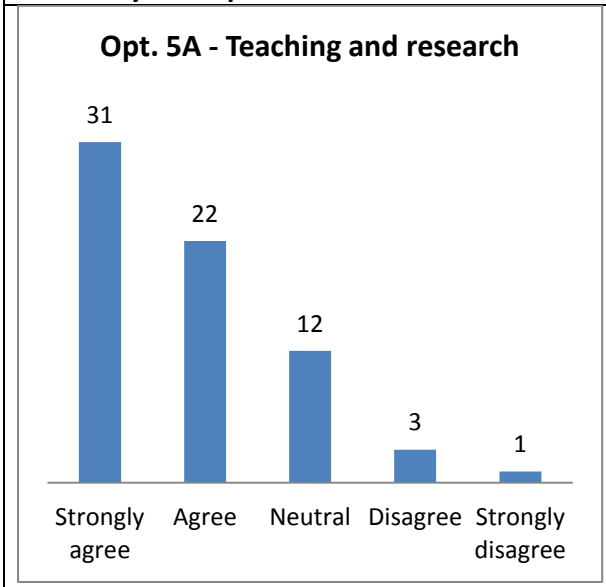
Many respondents were in support of this option. It was recognised that the dramatic increase in online retail means that there does need to be suitable infrastructure to support larger volumes of local delivery of small parcels and clamping down on B8 uses could have an adverse impact on both residents and businesses.

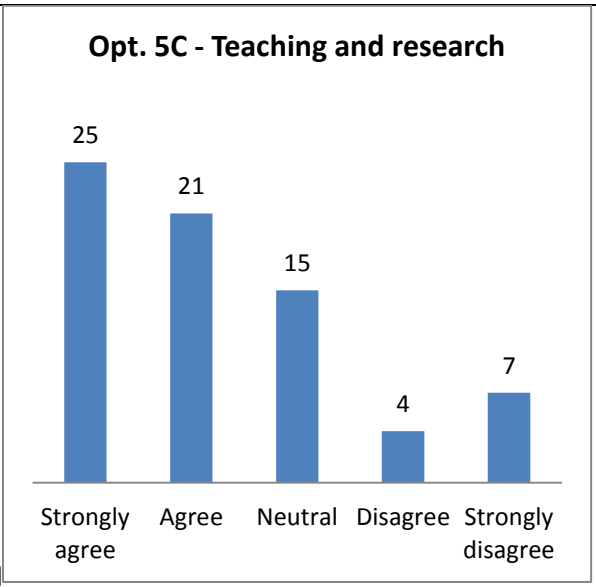
How these comments were taken into account in the proposed submission draft

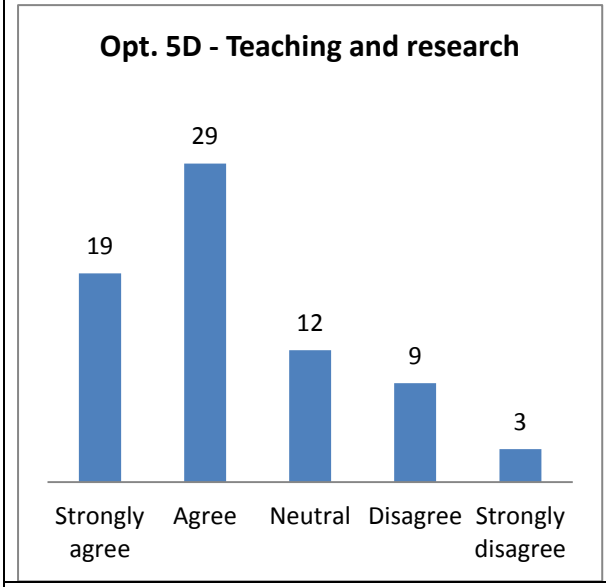
The overall support for the inclusion of an appropriate policy is noted and welcomed. Policy E1 of the proposed submission draft contains criteria that must be complied with in order for the loss of B8 space, including the requirement to demonstrate lack of demand for the use or need within the local economy or community.

Opt. 5: Teaching and research

Summary of responses







Additional comments

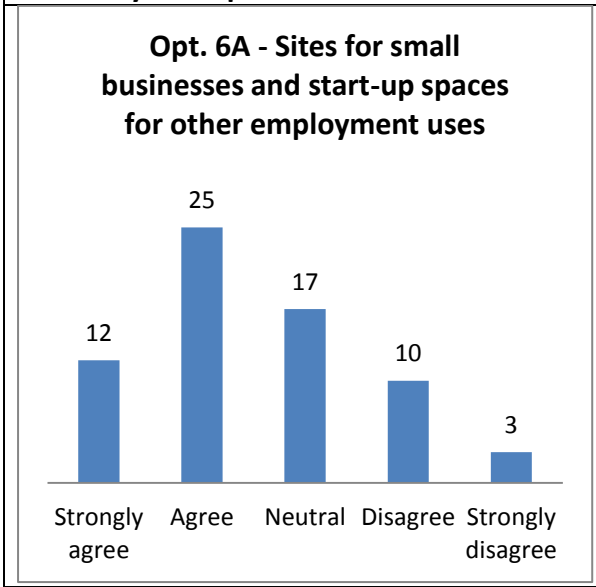
There was a mixed response overall to the options relating to how best to accommodate the growth and expansion of the hospitals and universities. Eleven additional respondents supported the preferred options as set out in the preferred options document while numerous suggestions were made for changes to the preferred options. Ten responses were made suggesting that certain functions of the universities were re-located outside of Oxford while eight comments were made in relation to objecting to the growth and expansion of Oxford Brookes.

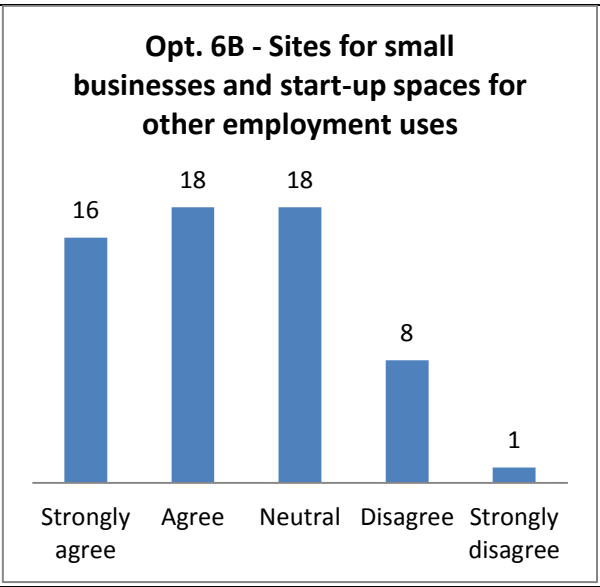
How these comments were taken into account in the proposed submission draft

The preferred options are represented by policy E2. The emerging plan supports the redevelopment and intensification of academic and administrative usage within the footprint of existing university sites. Any proposals to expand further would need to comply with the requriements of policy H8. Growth of the hospitals will be encouraged through redevelopment and intensification of their sites as set out in the site allocations.

Opt. 6: Sites for small businesses and start-up spaces for other employment uses (e.g. creative industries, virtual offices)

Summary of responses to PO





Additional comments

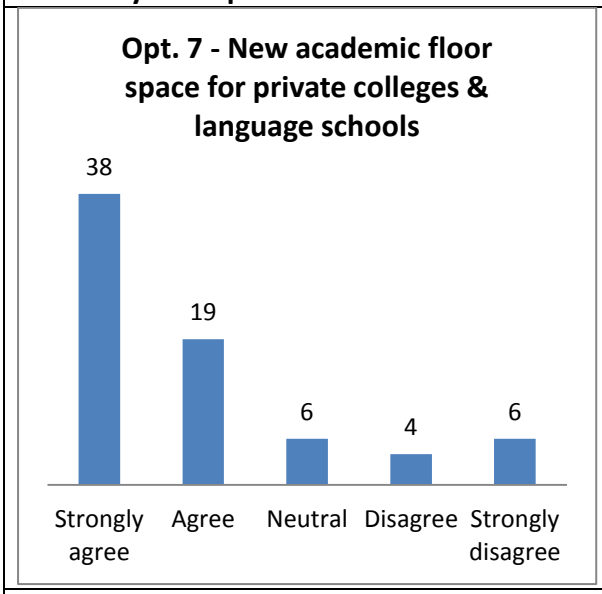
Nine additional respondents supported the preferred options as set out in the preferred options document (one respondent only supported part of the preferred options). Five respondents considered that small businesses and start-up spaces should be included on category 1 employment sites as well as on category 2 sites. Seven respondents considered that supporting small businesses and start-ups should be encouraged outside the city. Several respondents did not consider that the city and district centres were the most appropriate areas for start-up space, however several others considered that the very smallest businesses should be allowed to set up anywhere in the city.

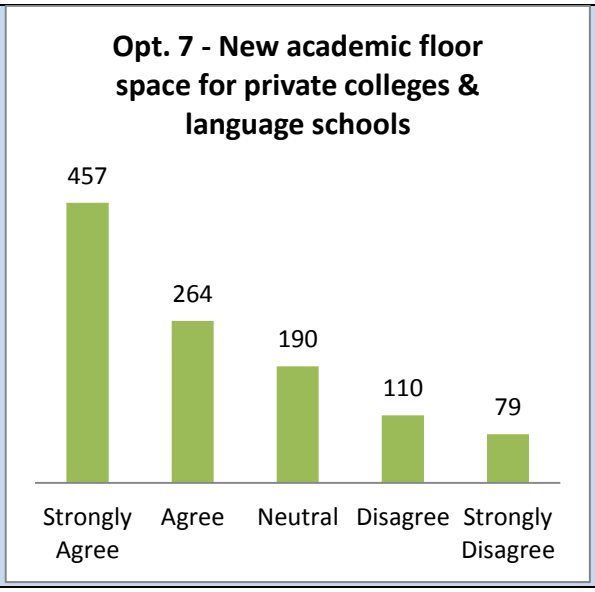
How these comments were taken into account in the proposed submission draft

Policy E1 will support the provision of spaces for small businesses and start-ups and similar uses on category 1 sites as long as they do not detract from the main economic functions of those sites. The policy represents a change in the preferred option, with the development of such uses emphasised with category 1 sites and all other proposed uses are to be assessed against the site specific circusmtances.

Opt. 7: New academic floor space for Private Colleges/language Schools

Summary of responses





Additional Comments

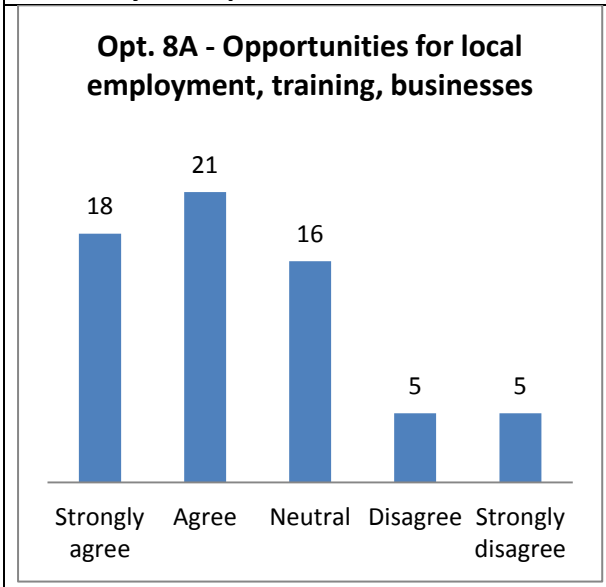
Thirty-nine respondents were in support of the preferred option. Seventeen respondents considered that the Universities should not be prioritised over language schools and strongly objected to the preferred options due to the restrictions placed on language schools and private colleges. Several respondents considered that language schools were better placed outside of or on the outskirts of the city.

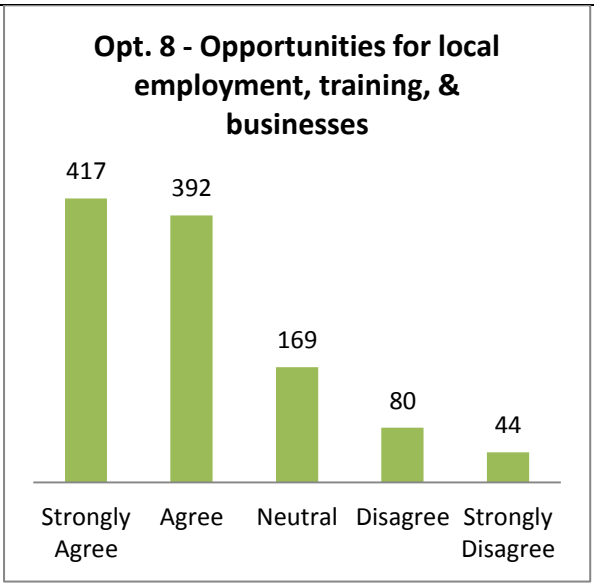
How these comments were taken into account in the proposed submission draft

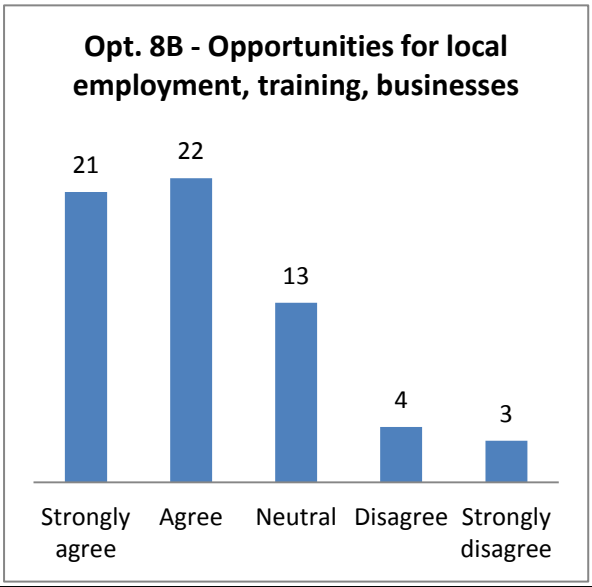
The overall support for the inclusion of an appropriate policy is noted and welcomed.
The preferred option was represetnted in the proposed submission draft by policy E3. The policy confirms the approach taken by the council to restrict new academic and administrative floorspace for private colleges and language schools. The approach is informed by the recognised contribution to the economic and civic life of the city of both universities, as well as the impact of the loss of suitable housing and potential employment sites to private college development. The policy also clarifies the circumstances for exemption from the policy, with the onus on developers to demonstrate that proposals contribute to all plan objectives. Specifically exempted private institutions and independent schools are identified in the policy due to their provision of statutory education and adult learning.

Opt. 8: Opportunities for local employment, training, & businesses

Summary of responses







Additional Comments

Nineteen additional respondents replied supporting the preferred options. Several queried how a proposed policy would be monitored and enforced and other sought clarity in relation to phrases such as 'realistically bid' and 'large construction project'. Only one respondent supported the rejected option but several of the respondents considered that the approach would increase costs, reduce construction and would not benefit local people.

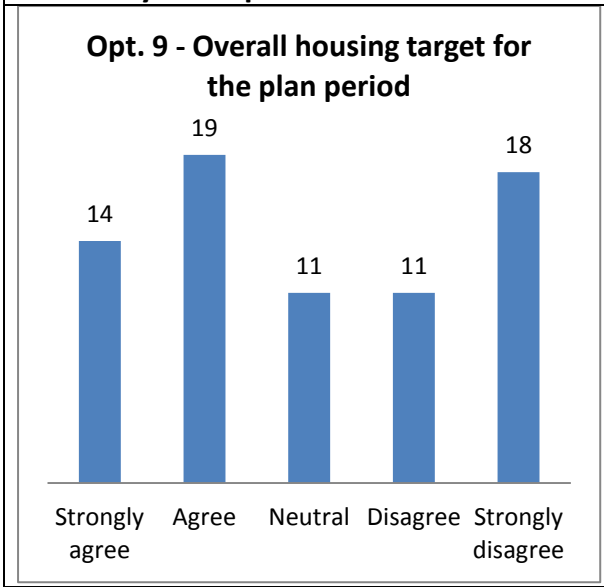
How these comments were taken into account in the proposed submission draft

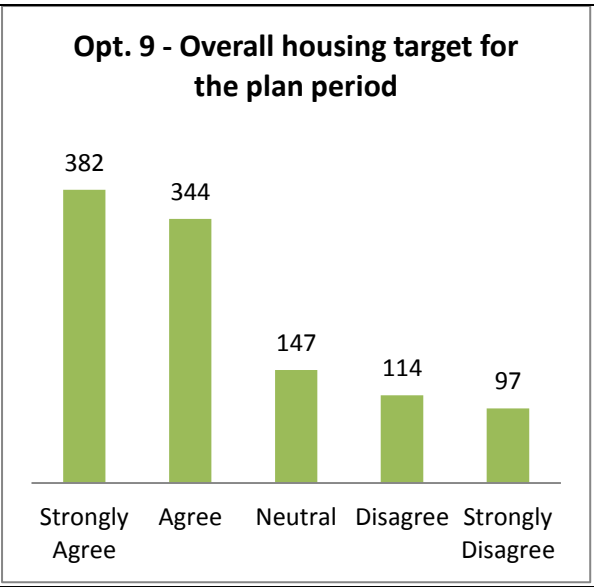
New development offers a significant opportunity to secure real benefits for the local community beyond those directly related to the use provided. Policy E4 applies to developments with more than 45 residential units or 1000m^2 of non-residential floorspace. The commitments required by this policy will be secured through the use of legal (s106) agreements.

C3: Creating a pleasant place to live, delivering housing with a mixed and balanced community

Opt. 9: Overall housing target for the plan period

Summary of responses





Additional Comments

There were a few comments in strong support of this approach. Some other comments were in support of the approach, but suggested ways of ensuring housing capacity was maximised, including compulsory purchase orders. Others said that the focus should not be on Oxford to deliver housing as it is already densely developed. A few said that the large number of students has a negative impact on housing availability. The largest number of comments said that the SHMA figure is incorrect and too high.

How these comments were taken into account in the proposed submission draft

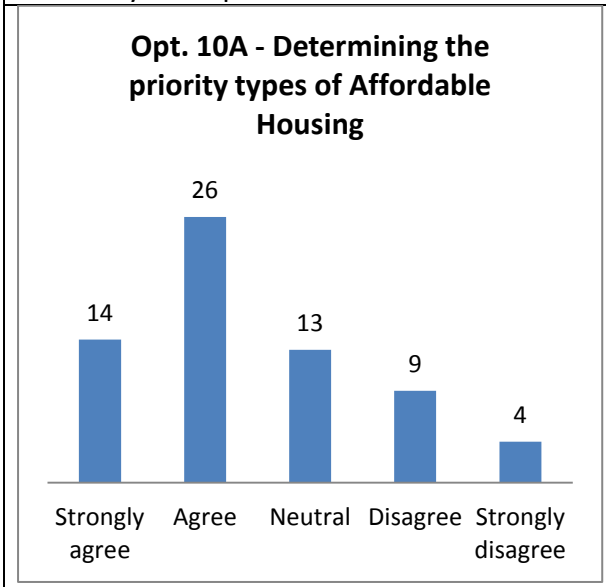
The Oxfordshire SHMA 2014 covers the period until 2031, so a 'roll-forward' study was commissioned by the City Council in order to understand housing need to 2036. The SHMA roll-forward study has used the same methodology as the previous SHMA, but has used the most up-to-date household forecasts and has re-calculated economic growth.

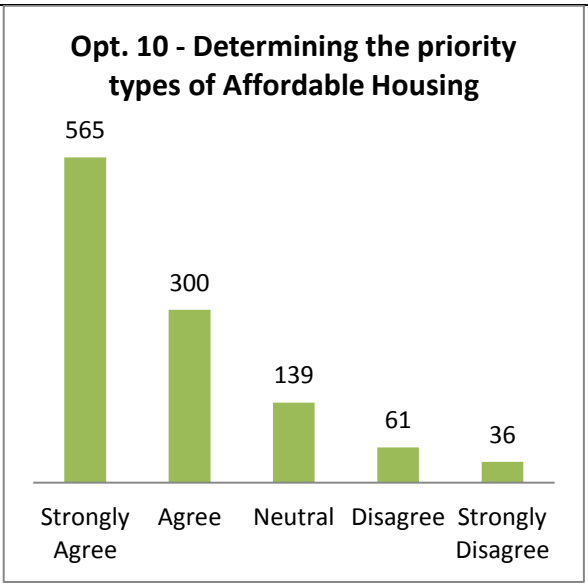
The objectively assessed need for new homes for Oxford is based on the updated SHMA, and this has been determined over the plan period to be much higher than the city can realistically accommodate within its administrative boundaries. In recognition of the existing significant constraints and following consultations with neighbouring authorities, the emerging local plan will adopt a capacity based approach and an agreed apportionment of homes to be provided within each of the adjoining districts to address the unmet need of Oxford.

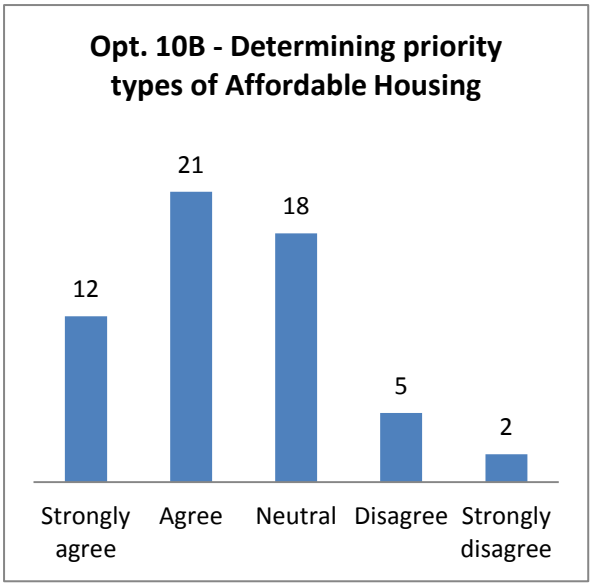
Other policies have been proposed within the submission draft that specifically address the impact of the city's student population on the housing situation. As with all parts of the local plan the policy has been subject to viability testing at plan stage and is considered to be viable.

Opt. 10: Determining the priority types of Affordable Housing

Summary of responses







Additional Comments

A few commenters were interested in ensuring homes were affordable in perpetuity. There was also some concern about the lack of provision for the homeless and the closure of shelters. Many saw housing in Oxford as not affordable anyway, and gave Barton Park as an example. Some said social rent was the only genuinely affordable option; others were interested in provision for key workers. One comment said the proposals do not reflect the SHMA.

How these comments were taken into account in the proposed submission draft

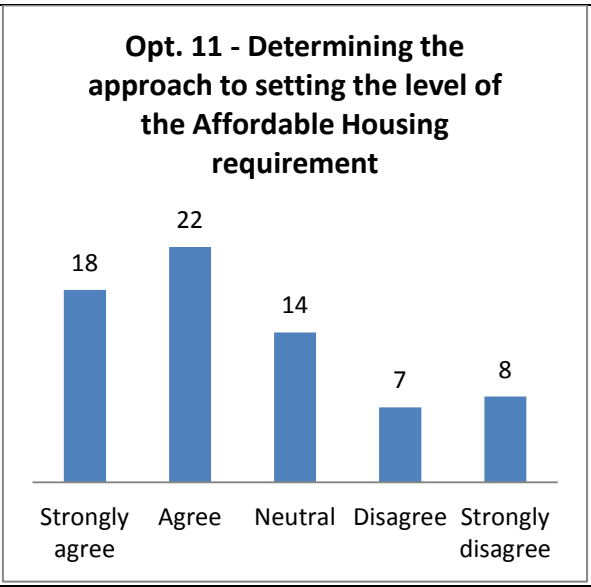
Policy H2 addresses the delivery of affordable homes Social rented homes are given priority as they are the most genuinely affordable. The 40% requirement is retained in the proposed local plan policies. Other forms of affordable housing, such as intermediate housing and affordable rented, are not the most affordable options in the Oxford setting and are likely to only benefit a limited pool of residents. As with all parts of the local plan the policy has been subject to viability

testing at plan stage and is considered to be viable.

Affordable housing linked to employment is considered having the potential to be a key part of the provision available in the city and will be supported in the emerging plan. This is addressed in Policy H3 (see responses to opt.12)

Opt. 11: Determining the approach to setting the level of the affordable housing requirement

Summary of responses



Additional Comments

Some said there should be more flexibility, as 50% affordable housing is often not delivered anyway. Others said that that affordable housing should be the priority, or that 100% of housing should be affordable, or that developments should not be allowed if they can't deliver affordable housing. The largest number of comments suggested that social houses should be offered to local people first.

How these comments were taken into account in the proposed submission draft

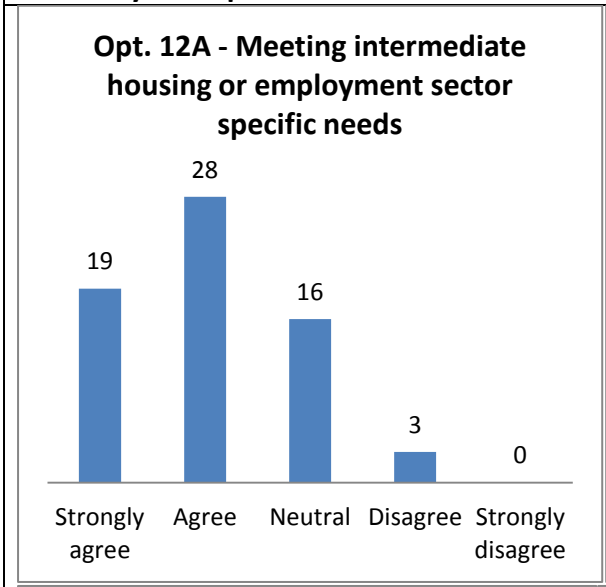
The overall support for the inclusion of an appropriate policy is noted and welcomed.
Due to the extent of the need for housing in Oxford, there is not much scope for flexibility in the affordable housing policy (Policy H2). Exceptions to the 50% requirement from qualifying sites will only apply once robustly demonstrated that this makes a site unviable, in which event a cascade approach will be applied to ensure that some level of provision comes through.

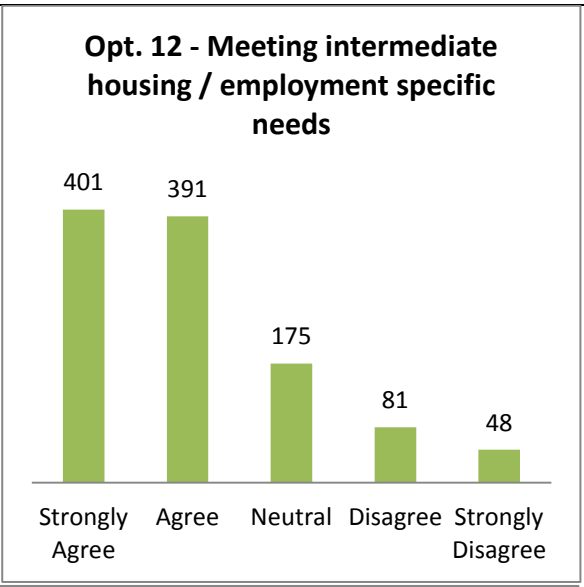
For smaller sites and qualifying new student accommodation a financial contribution will be secured. As with all parts of the emerging plan the policy has been subject to viability testing at plan stage and is considered to be viable.

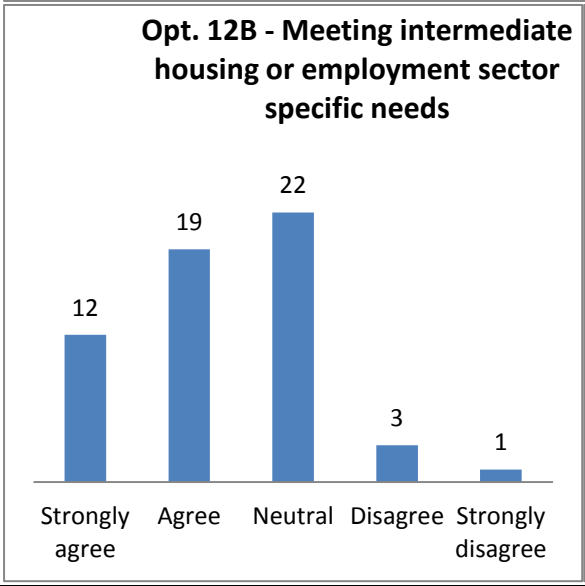
Allocation of housing is implemented by the council housing services department and as such will be beyond the scope of planning policy.

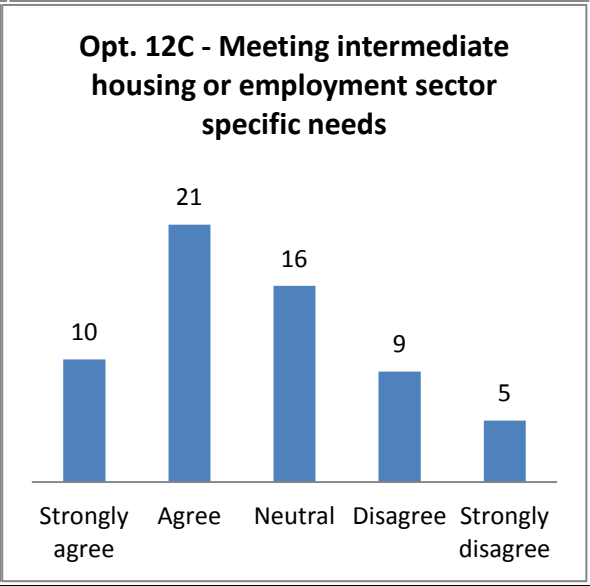
Opt. 12: Meeting intermediate housing / employment specific needs

Summary of responses









Additional Comments

13 people commented to say that they supported the preferred option. 42 comments were made suggesting moderations to or things that should be included in the preferred option, including differentiating for non-profit organisations, specifying the types of staff, not insisting on 100% affordable housing, especially if it may impact on viability and deliverability. There was some concern it might be open to abuse, some queries about how it would operate and ensure in perpetuity.

How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed.

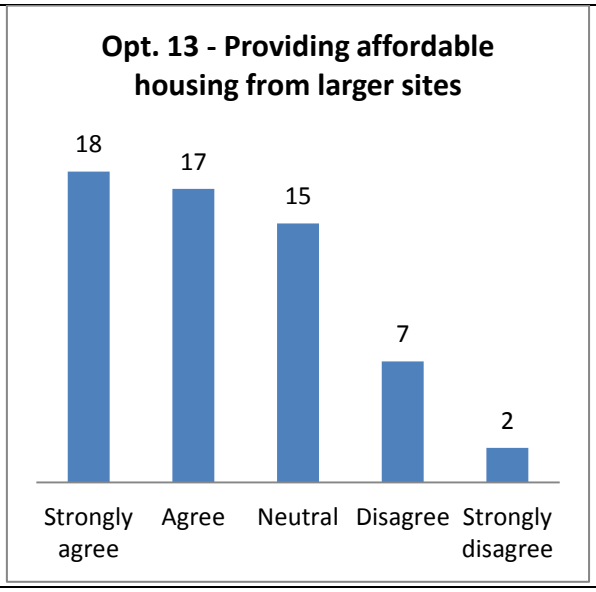
The policy will be applicable to specific employers and specified sites allocated for the purpose of employer linked housing. The intended purpose is that there is housing choice for a wide cross section of employees including those that may well have otherwise have

relied on council provided housing. To ensure that the benefits of this policy are secured for the longest possible period and for the most beneficiaries, a legal agreement will be required between the council and developer, to state the terms of operation, allocations policy and procedures to follow in the event that the employer no longer requires the dwellings to revert such housing to management of an RP under the affordable housing regime.

In order to ensure viability of those specified sites, the standard affordable housing requirements in policy H2 will not apply.

Opt. 13: Providing affordable housing from larger sites

Summary of Responses



Additional Comments

There were not many additional comments on this option. There was some concern that it is in conflict with national policy and that it would affect viability.

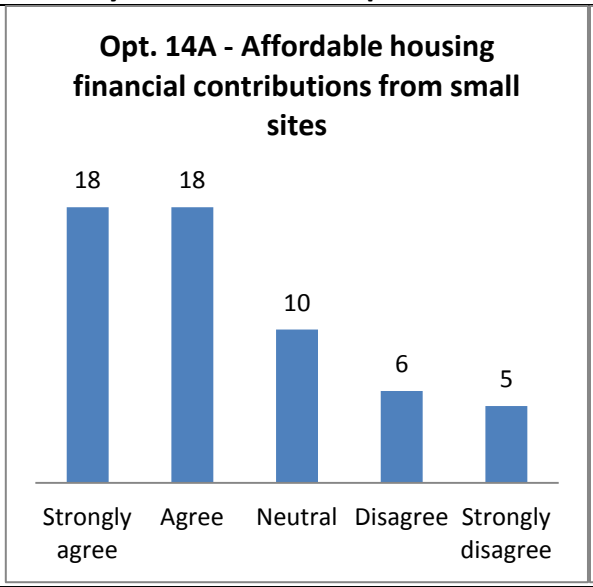
How these comments were taken into account in the proposed submission draft

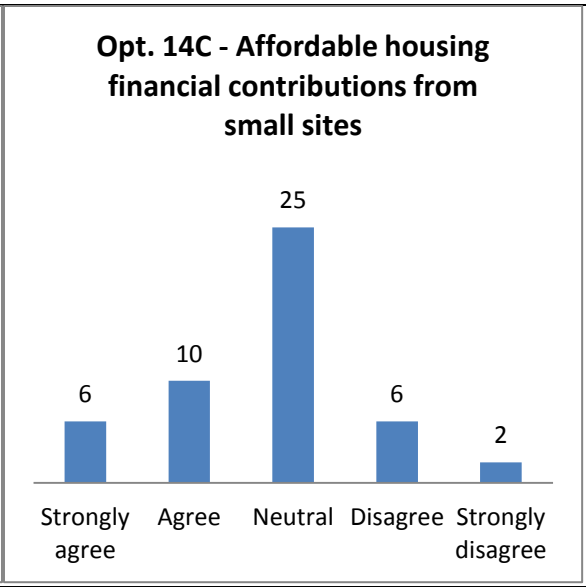
The overall support for the inclusion of an appropriate policy is noted and welcomed. Due to the extent of the need for housing in Oxford, there is not much scope for flexibility in the affordable housing policy (Policy H2). Exceptions to the 50% requirement from qualifying sites will only apply once robustly demonstrated that this makes a site unviable, in which event a cascade approach will be applied to ensure that some level of provision comes through. For smaller sites and qualifying new student accommodation a financial contribution will be secured.

As with all parts of the local plan the policy has been subject to viability testing at plan stage and is considered to be viable.

Opt. 14: Affordable housing financial contributions from small sites

Summary of additional responses





Additional Comments

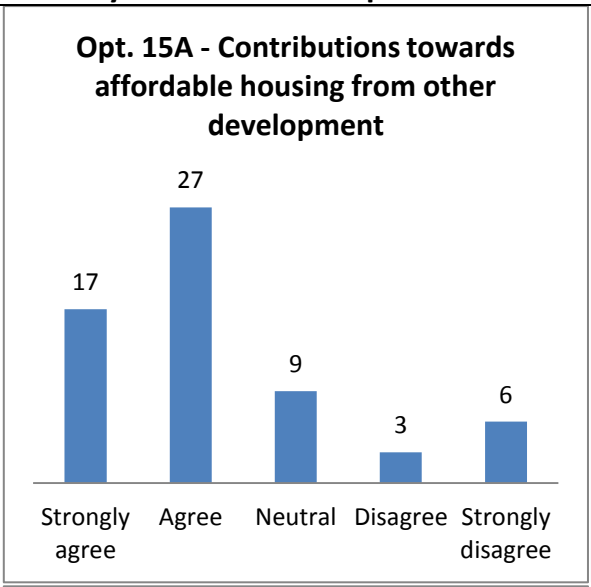
There were not many additional comments on this policy. The largest number of comments say that the proposed policy approach is not consistent with national planning policy. A number of other comments support the alternative options.

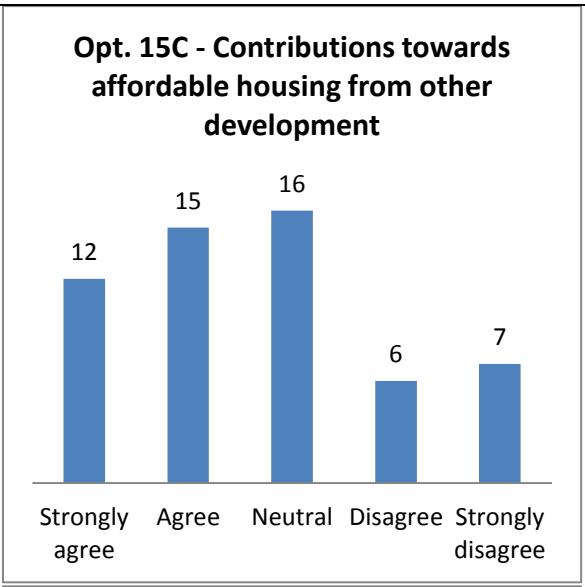
How these comments were taken into account in the proposed submission draft

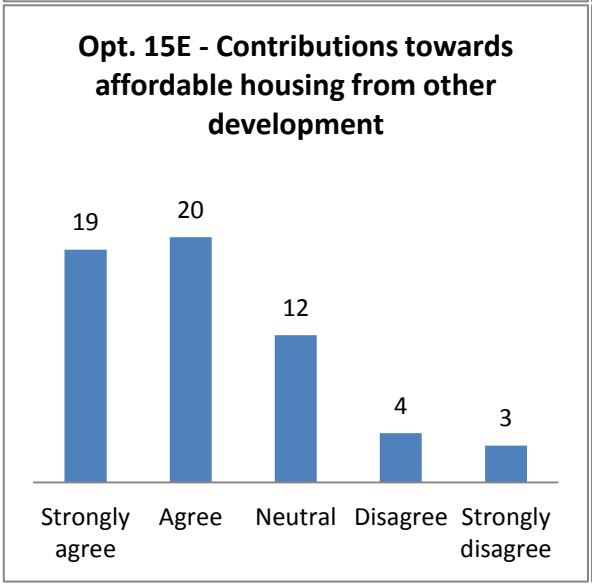
Due to the significant physical constraints within Oxford small sites (less than 10 homes) are an important route for the delivery of housing in the city and in fact form the majority of the housing supply. The constraints and the high level of affordable housing need are considered to be exceptional circumstances that would justify seeking contributions for smaller developments, even though it is a different approach to what is done elsewhere. The requirements are outlined in policy H2 and the policy has been subject to viability testing at plan stage and legal scrutiny.

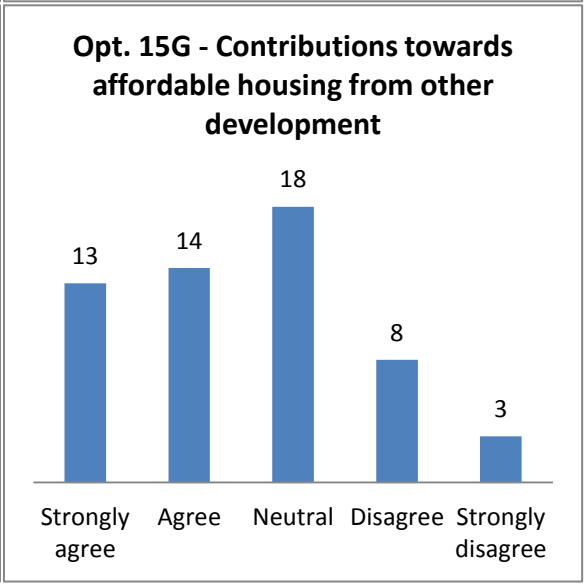
Opt. 15: Contributions towards affordable housing from other development

Summary of additional responses









Additional Comments

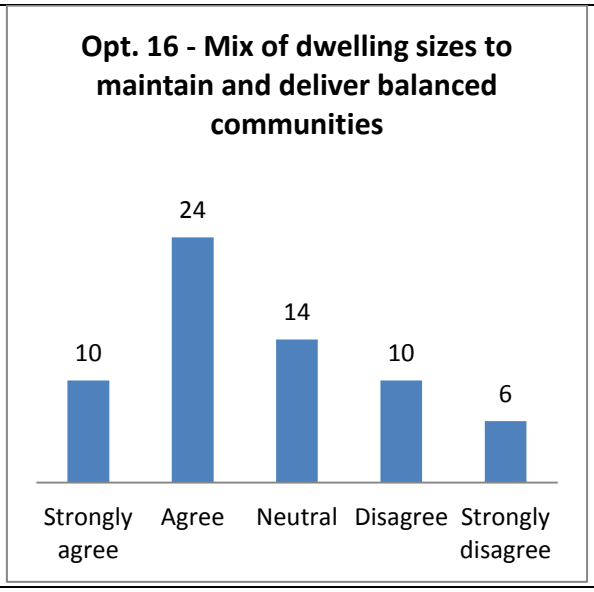
The largest number of comments queried whether the existing exemptions set out in the policy would still apply. A couple of commenters were concerned that this would increase the cost of university education or result in no new provision of student accommodation. One commenter said that a link to floor space would make the policy clearer.

How these comments were taken into account in the proposed submission draft
As with all parts of the local plan the policy has been subject to viability testing at plan stage and is considered to be viable. Affordable housing is primarily addressed in policy H2, which includes criteria for qualifying developments (minimum number of units, site area)

Contributions will be sought from self-contained residential developments of class C2 and C3, which includes retired homes and sheltered housing. Self-contained student housing is also subject to this policy. Employer linked housing will be exempted from the requirements of H2 subject to the qualifying criteria outlined in H3.

Opt. 16: Mix of dwelling sizes to maintain and deliver balanced communities ('balance of dwellings')

Summary of responses



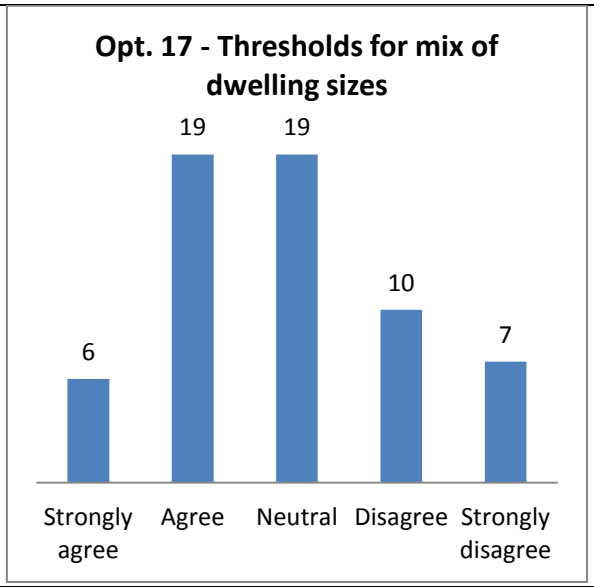
Additional Comments

Most commenters saw smaller, cheaper units and units to enable elderly to downsize as most important. There was some support in the comments for flats as opposed to houses. There was some support for the idea of using SPDs that can be updated to set the balance.

How these comments were taken into account in the proposed submission draft

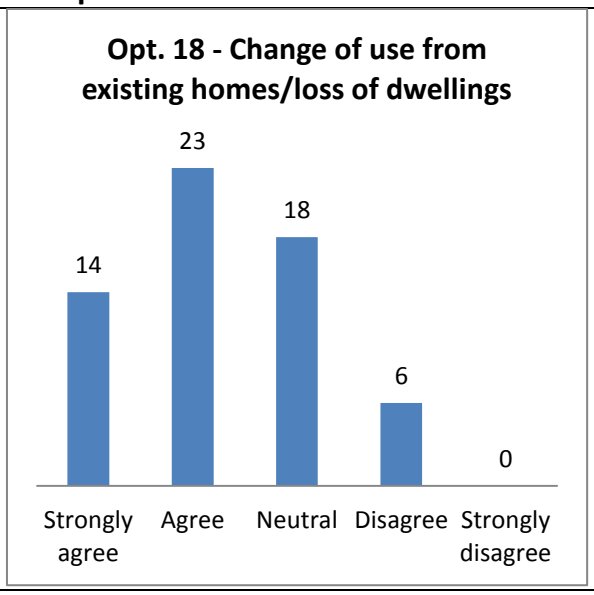
The overall support for the inclusion of an appropriate policy is noted and welcomed. The preferred option is represented in the proposed submission draft by policy H4. The proposed housing mix has been determined by findings contained in the SHMA and from the range of required need according to the affordable housing register. Factors also taken into consideration were the existing housing stock and the need of some people to downsize.

Opt. 17: Thresholds for mix of dwelling sizes ('balance of dwellings')

Summary of Responses

Additional Comments
There were very few additional comments on this option. A couple of commenters supported option A and B and one wanted to see the threshold remain at 10.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The preferred option is represented in policy H4. As so much development in the city is on smaller sites, with some exempted due to permitted development rules, the existing policy is only triggered on a very small number of sites and as such is of limited impact. The proposed policy seeks to focus on larger strategic scale sites to deliver family sized homes while the smaller developments can continue to deliver smaller sized units. The aim of the approach proposed in the preferred option is that larger sites will have a mix of units, to ensure a more balanced community. It is represented in policy H4.

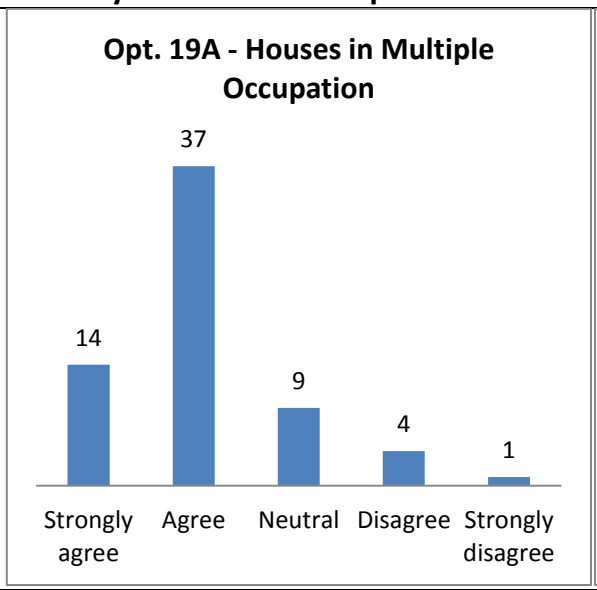
Opt. 18: Change of use from existing homes/loss of dwellings

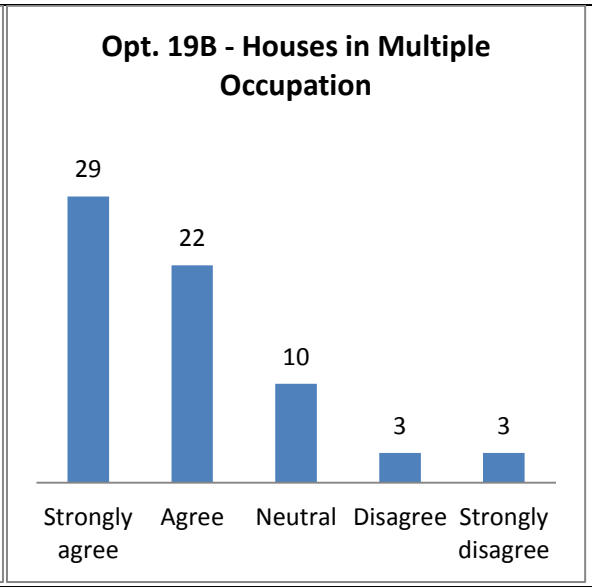
Summary of additional responses

Additional Comments
There were few additional comments made relating to this option. Those who did offer additional comments supported the preferred options but offered suggestions for change or wanted details to be added, including merging with option B to give more flexibility and allowing linked developments. A couple thought option A was too flexible.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. Policy H5 concerns developments involving loss of dwellings and was developed while bearing in mind the need to include a level of flexibility in circumstances where the net loss of a dwelling will be acceptable. The required criteria are fairly narrow to make such instances exceptional and to reduce the chances of allowing inappropriate development. In practice will be restricted to essential works to make a dwellings living conditions acceptable, and changes of use to important community facilities.

Opt. 19: Houses in Multiple Occupation (HMOs)

Summary of additional responses





Additional Comments

Some additional respondents suggested that HMOs or student HMOs should be restricted, some thought there should be more flexibility/the percentage policy dropped and two thought there should be higher space/amenity standards.

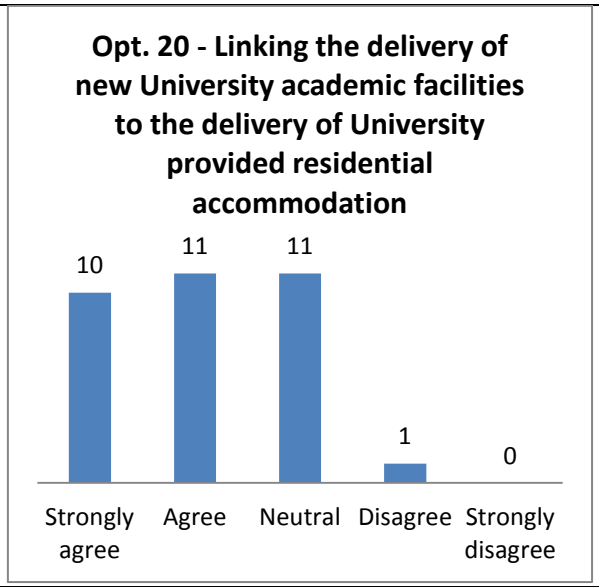
How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed.

HMOs are addressed in Policy H6. It includes a 'percentage policy' which requires that a development does not result in the proportion of buildings serving as HMOs 100m either side of the site exceeding 20%. This figure aligns with the estimated number of the city population that lives in an HMO and is deemed to be proportional to the level of expected need. There is no set target for a maximum number of HMOs although they will be required to comply with the good practice guides produced by the council. The policy also specifically requires compliance with council requirements for space/amenity standards, which are outlined in Policy H15.

Opt. 20: Linking the delivery of new University academic facilities to the delivery of University provided residential accommodation

Summary of Responses



Additional Comments

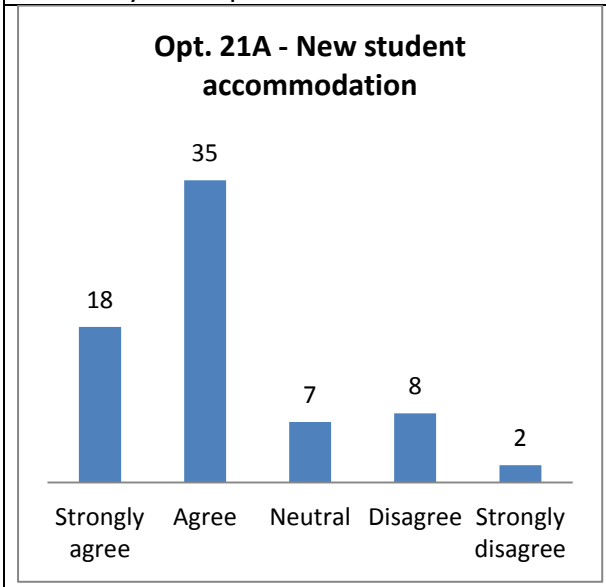
Some additional respondents wanted to see stronger monitoring, recording and visible enforcement of students living in university accommodation. One suggested there should be no more student accommodation in wards with 30% or more 18-25 year olds. The University of Oxford says it has not collected monitoring data to match the new criteria yet, but would begin to. It suggests its figure is too low to achieve currently. A few were opposed to the preferred option because it allows expansion of the universities, and a couple thought it would lead to more students living out than is currently permitted/did not think post-graduate research students should be excluded.

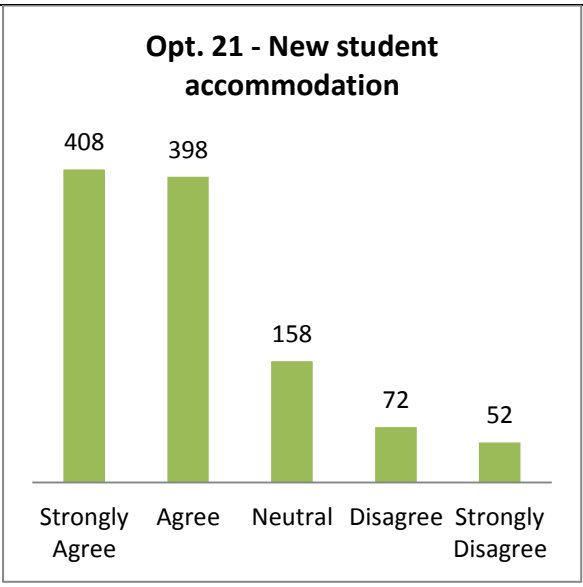
How these comments were taken into account in the proposed submission draft

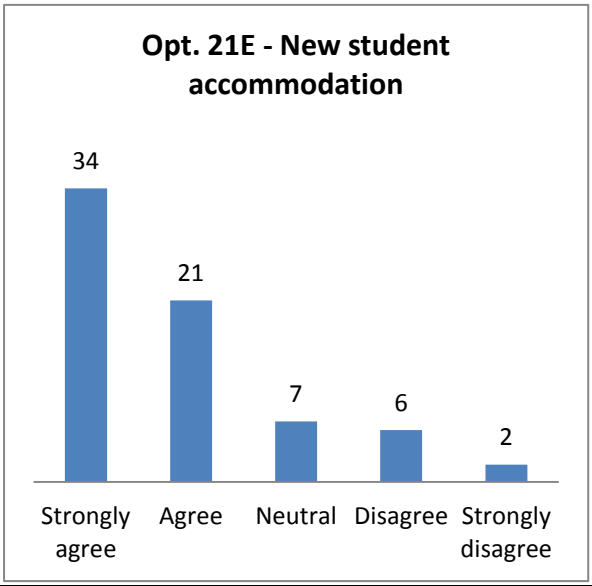
The overall support for the inclusion of an appropriate policy is noted and welcomed. The preferred option is represented in policy H9. The use of a student number threshold has been agreed with the two Universities. This is considered to be most efficient and transparent means of monitoring the implementation of the policy. Post graduate research students are not included because their housing needs are often very different from university provided accommodation and make a more economically active contribution to the life of the city.

Opt. 21: New student accommodation

Summary of Responses







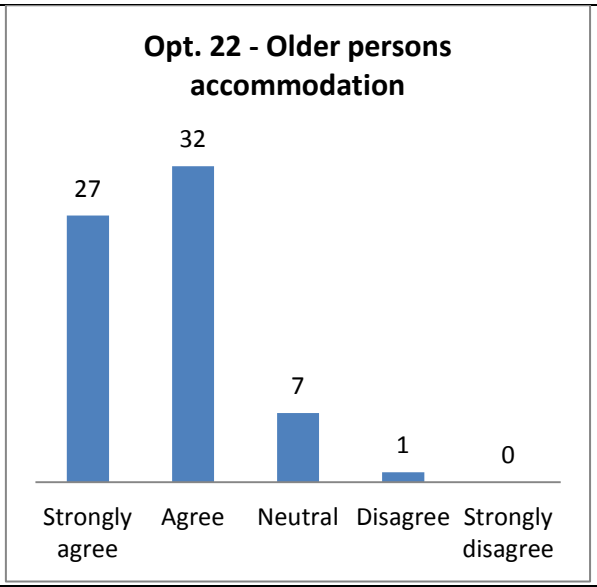
Additional Comments

Majority of the additional comments (17) did not want to see any new student accommodation at all. The next highest number of comments didn't want to see any speculative student accommodation. A few thought that student accommodation should be encouraged as it removes students from market housing and because the universities should be supported. A few were concerned about the quality of student accommodation and its high cost for students. EF provided detailed evidence about the stifling impact the policy would have on private colleges and language schools.

How these comments were taken into account in the proposed submission draft
Aspects of both preferred options are represented in policy H8. It demonstrates the balance that needs to be struck between enabling the universities to provide accommodation for their students thus limiting the number of students in general market housing, and ensuring student accommodation is in the right locations. The impacts of private colleges and language schools are addressed more specifically in policy E3

Opt. 22: Older persons accommodation

Summary of responses

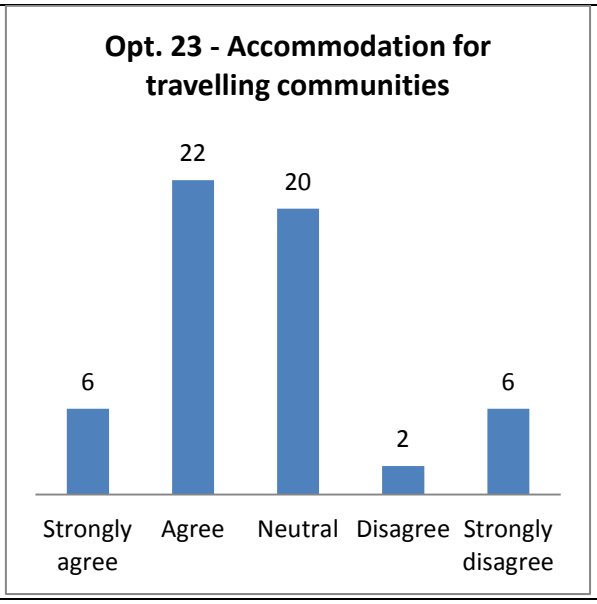


Additional Comments

Two comments noted that cohousing offers a particularly supportive environment as members' age (and that purpose-built elderly accommodation may not be attractive to everyone). Older persons accommodation located within the community was seen as important by a couple of others. The County Council commented to say that further sites that come forward should be considered for extra care, particularly for dementia as this is currently under-provided.

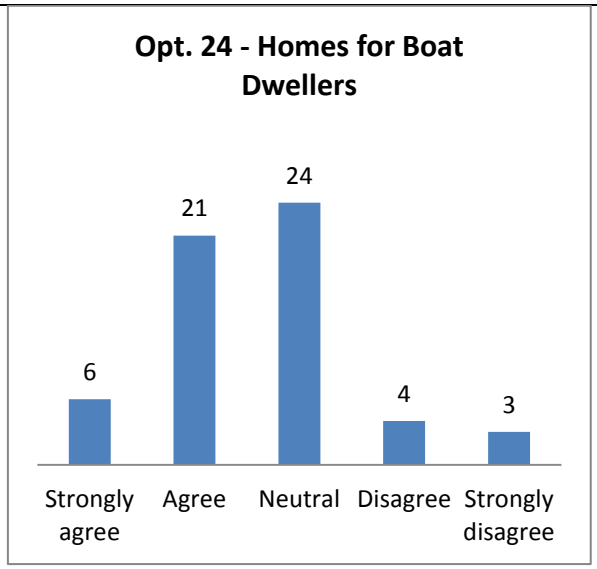
How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. Policy H11 in the proposed submission draft addresses the accommodation needs for older persons as well as specialist housing and supported living accommodation. The policy requirements emphasise the importance of locating such accommodation in sustainable locations and within or close to mixed communities. There are also provisions to ensure that existing facilities are not lost without a suitable replacement or justification that there is no further need.

Opt. 23: Accommodation for travelling communities

Summary of responses

Additional Comments
There were 6 additional comments relating to this option, half of which were in support, two said it should be clear it is a criteria based policy/offered suggestions for criteria and one was concerned about travellers not obeying the rules.

How these comments were taken into account in the proposed submission draft
A joint study undertaken with other Oxfordshire districts suggests there is no current or forecast need for traveller sites within Oxford. Nevertheless an appropriate policy (H12) has been included in the proposed submission draft in order for the Council to be prepared in the event that any sites are proposed during the Plan period.

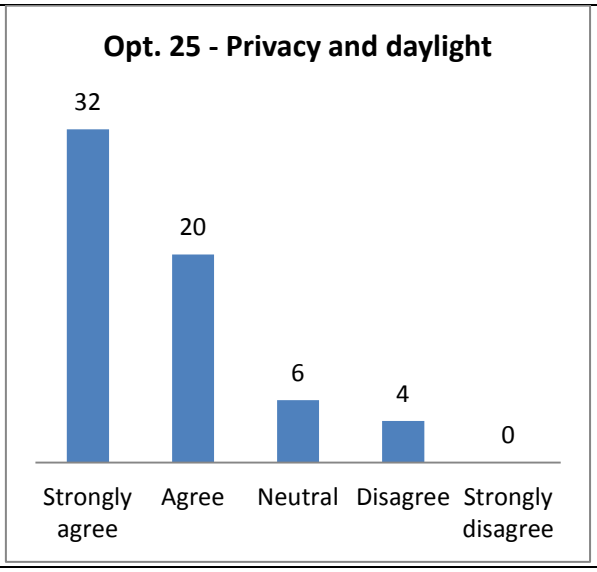
Opt. 24: Homes for Boat Dwellers

Summary of responses


Additional Comments
17 additional comments were made relating to this option. 5 of those were in support. 7 commenters wanted to see more residential moorings as boat living is affordable/has a low environmental impact. A couple, including the Environment Agency, wanted criteria to look at the impact on the riverine environment. One commenter strongly disagreed with the approach, saying it shows the contempt OCC has for boat dwellers.

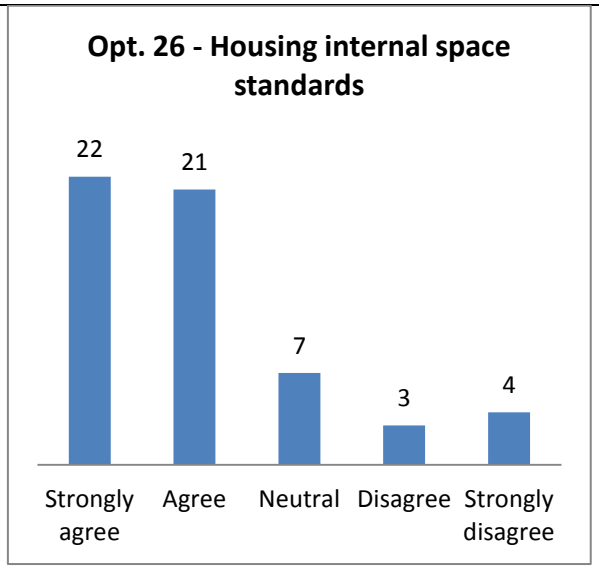
How these comments were taken into account in the proposed submission draft
The preferred option has been integrated into the proposed submission draft as policy H13. It sets out the criteria for assessing proposals for new moorings based on impacts on operations on waterways, the environment, access and surrounding amenity. In drafting the policy, the council has sought to strike a balance between the level of demand, the limited capacity on the waterways and the need to ensure that there is no negative impact on the environment and neighbours.

Opt. 25: Privacy and daylight

Summary of Responses

Additional Comments
There were only two additional comments on this option, both in support.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The proposed submission draft contains Policy H14 which addresses Privacy, daylight and sunlight matters. It also states the assessment criteria used to determine the acceptability of the impacts of a development in these respects. The use of specific criteria e.g. 45 degree guidelines, is justified as these are well established and objective methods that would reduce ambiguity and assist with transparent decision making.

Opt. 26: Housing internal space standards

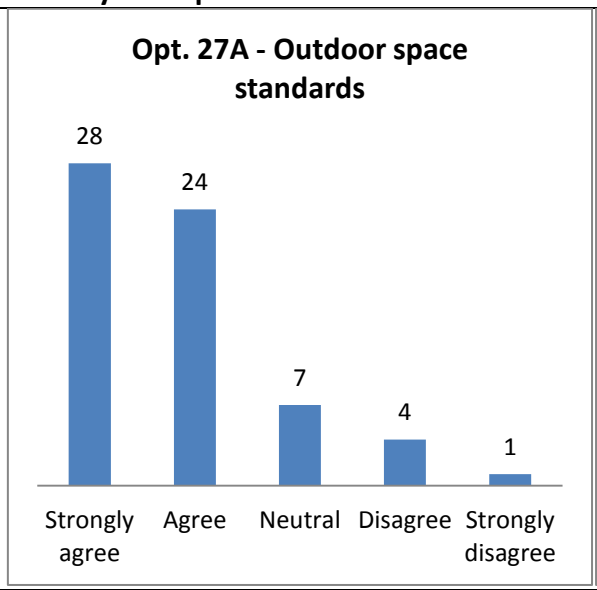
Summary of Responses


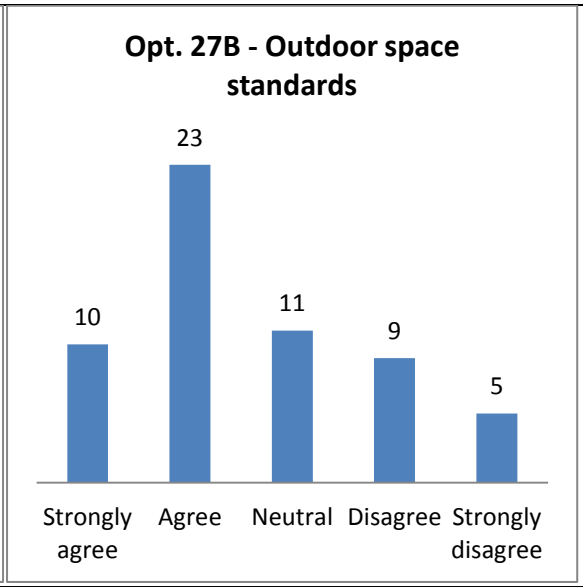
Additional Comments
A couple of people wrote extra comments to show their support. Others wondered about implementation. The University of Oxford considered that there should be an extra policy approach for university developments that would permit dense urban living within the city and district centres, West End and Osney Mead. A few wondered what evidence would be provided. One thought smaller, cleverer housing was needed and another thought the standards are too small.

How these comments were taken into account in the proposed submission draft
The proposed submission draft contains Policy H15 on minimum acceptable internal space standards based on national space standards. The rationale is to simplify and rationalise the number of standards applicable to new homes, which could be complex, overlapping or contradictory. As written the proposed policy will largely be a formalisation of existing practice and will facilitate and improve the development management decision making process. Pressure to deliver new homes or make efficient use of land can lead to prioritisation of delivering high volumes within short timescales to the detriment of creating pleasant and useful living spaces for residents. There are also no identified local circumstances that would justify why the national space standards could not be implemented on new developments. Making reference to the national standards will ensure the creation of housing with adequate space for occupants, functional layouts and scope for adaptation and modification. It would also codify existing practice which is already based on those standards, provide clear definitions and points of reference, and remove any trace of ambiguity in interpreting spatial requirements.

Opt. 27: Outdoor space standards

Summary of responses





Additional Comments

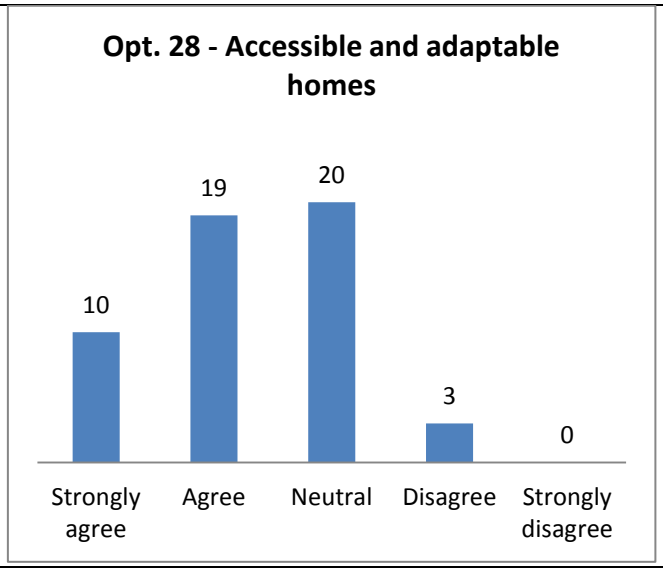
Only 8 additional comments were made in relation to this option, half of which were in support. One suggested it should apply to flats only, one suggested it could include allotments/community gardens and the University of Oxford said it should not apply to university developments so as to allow denser developments.

How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed. The proposed submission draft contains Policy H16 addresses standards for outdoor amenity spaces. The proposed standards will apply to all dwellings, in order that all residents will have access to a quality of space that is pleasant, livable and functional.

A separate policy has been proposed for student accommodation (policy H8) in recognition of the specific requirements and patterns of use of such spaces. Those include requirements for outdoor communal spaces depending on their design and capacity.

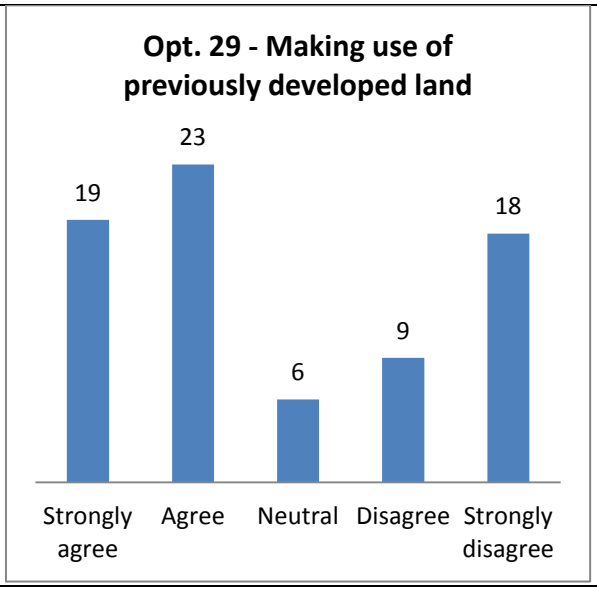
Opt. 28: Accessible and adaptable homes

Summary of Responses

Additional Comments
Only 9 additional comments were made in relation to this option, 5 of which were in support. The HBF noted the additional cost on development and wants to the see the use of standards justified. The University of Oxford though this should not apply to university developments, which require an extra policy approach.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The proposed submission draft contains Policy H10 addressing Accessible and adaptable homes, requiring all affordable homes and minimum levels of provision pf Category 2 and 3 standard homes depending on the size and type of the development. As with all parts of the local plan the policy has been subject to viability testing at plan stage and is considered to be viable.

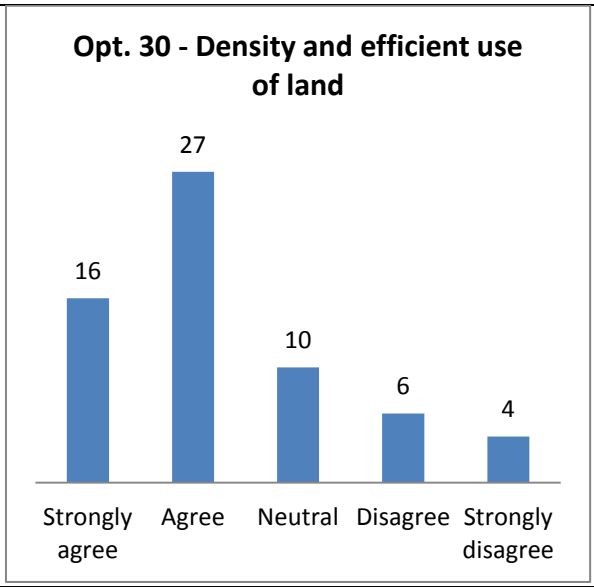
C4: Making wise use of our resources and securing a good quality local environment

Opt. 29: Making use of previously developed land

Summary of responses

Additional Comments
Additionally written comments stated that there was not enough emphasis on flood risk management or on water management with relation to climate change impacts; design of the built environment should be responding to climate change and technological changes; and expressed support for the most efficient use of land and co- housing.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE2. Wording in the policy makes reference to maximising efficiency of the use of land and increasing density where appropriate to do so, as well as stating that development must be done in a manner compatible with the site itself (which includes physical characteristics like flood risk). Further detail on water management and dealing with impacts of climate change can be found throughout policies RE1, RE3, and RE4.

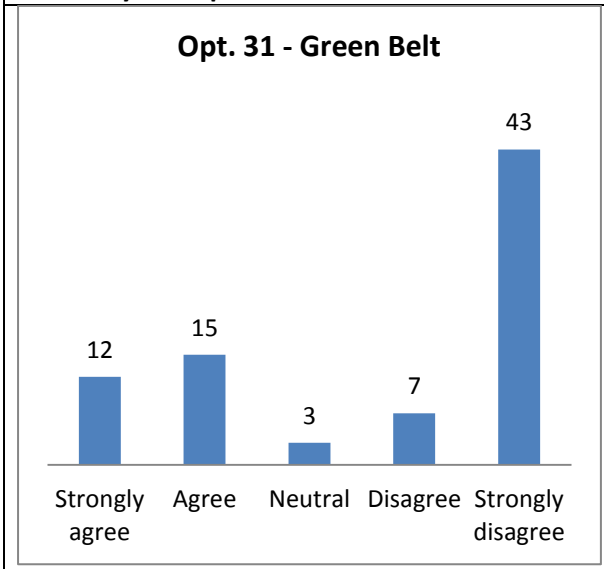
Opt. 30: Density and efficient use of land

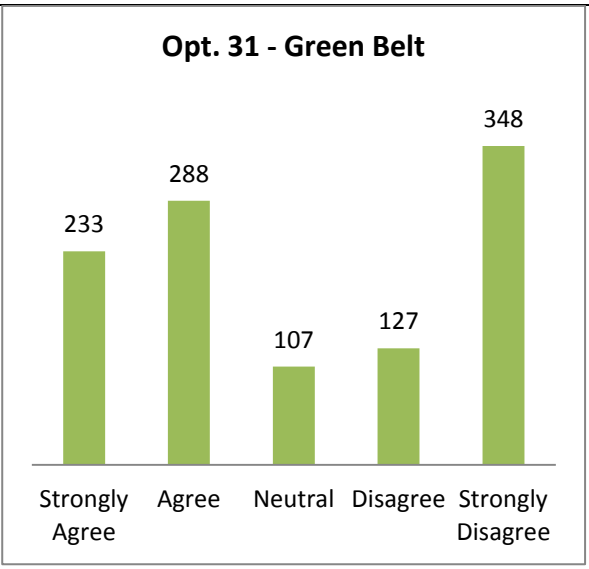
Summary of responses

Additional Comments
This preferred option had a fairly mixed set of additional written responses. Sixteen respondents made additional comments fully in support of the preferred option. Forty-six respondents supported the preferred option, but emphasised that it needed to further encourage and enable high density development. Four respondents considered that it must be assessed on a case by case basis, taking into account specific site characteristics and circumstances. Fifteen respondents disagreed with the preferred option considering it encouraged an increase in building heights which it should not. Three respondents disagreed with the preferred option as it would result in an undesirable increase in high rise accommodation.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE2. Overwhelming support was expressed for encouraging higher density development and improving efficiency of land use. This ambition was carried through into the policy. Text within the policy refers to ensuring that any development be compatible with the site itself – which is the manner through which alternative considerations such as design and heritage will be assessed.

Opt. 31: Green Belt

Summary of responses





Additional Comments

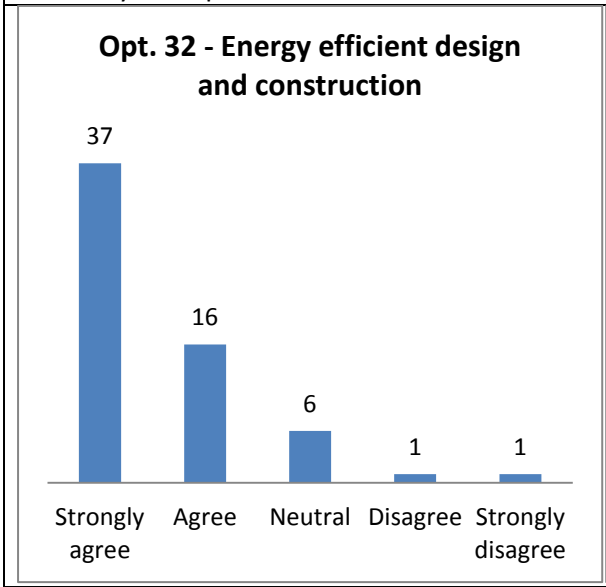
The majority of additional written responses received tend to be polarised, either in support of development in the Green Belt (GB) or strongly opposed. Some of the comments recognise that some development in the GB is inevitable if Oxford is to meet its housing need, although recognise the need to maintain sufficient levels of open space for people's enjoyment and wellbeing. A number of the responses acknowledged the need to work with adjoining authorities to make effective decisions as to where housing future growth should go.

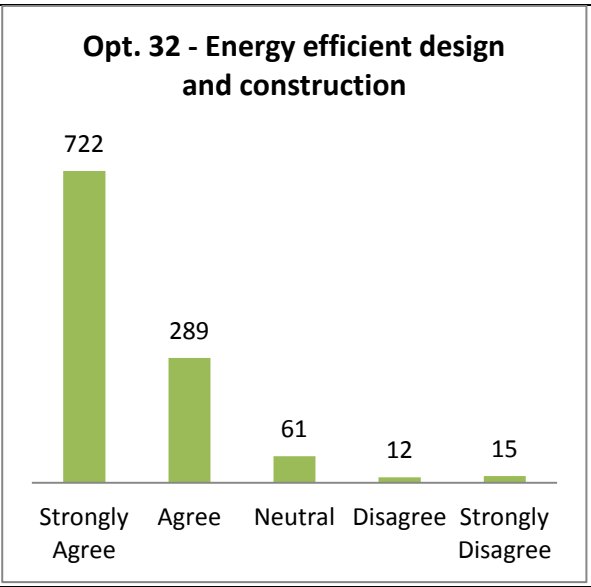
How these comments were taken into account in the proposed submission draft

This preferred option is represented in policy G3. Feedback was mixed and a correspondingly careful and thorough approach has been taken in policy development. A small number of carefully chosen sites have been put forward through the Local Plan, whilst the policy approach is to otherwise follow national policy and refuse any permission for innappropriate development within the Green Belt.

Opt. 32: Energy efficient design and construction

Summary of responses





Additional Comments

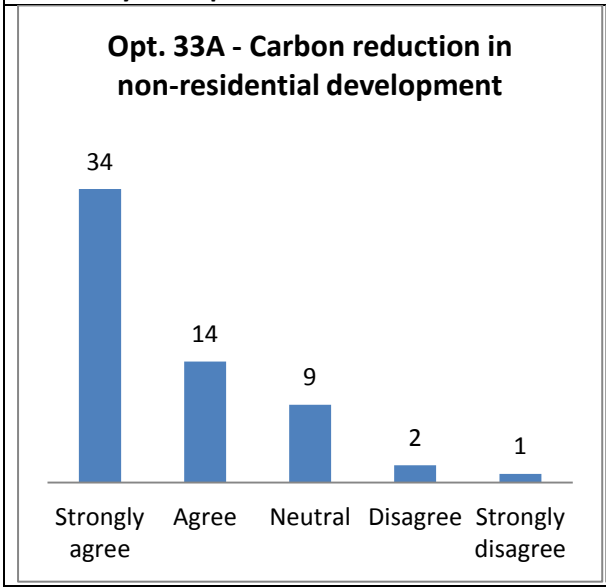
A number of additional written comments were received in support of the principles of this option; however, a number of responses would like the wording of the policy to present more certainty – recognising the challenge that the inclusion of such policies has on the developers. In addition, the wording must be as such to enable both big and small developers to incorporate energy efficiency in new design. Some comments received, although supportive in principle, raised concerns that although the requirements were good for the environment they can result in increased housing prices for people already struggling to find affordable housing.

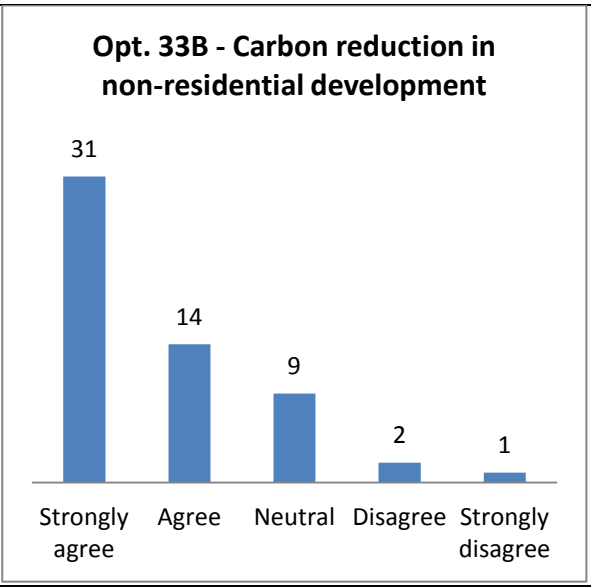
How these comments were taken into account in the proposed submission draft

This preferred option is represented in policy RE1. Viability testing, as well as careful consultation and engagement with relevant experts, was undertaken in order to ensure the practicability of the policy requirements, as per concerns expressed in the preferred options consultation.

Opt. 33: Carbon reduction in non-residential development (demonstrated through BREEAM)

Summary of responses





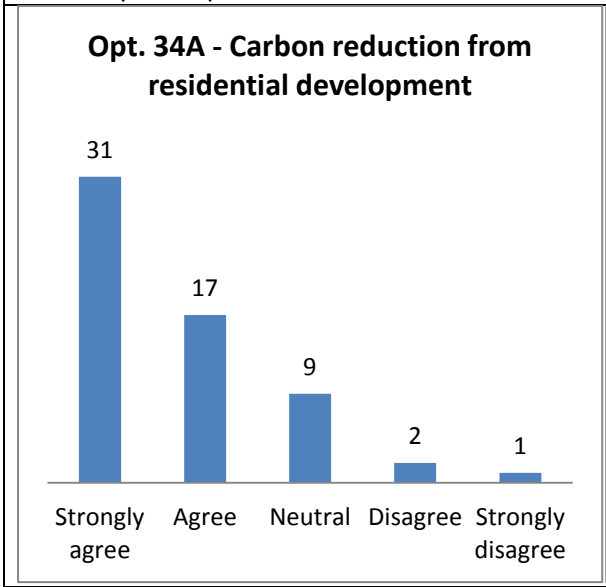
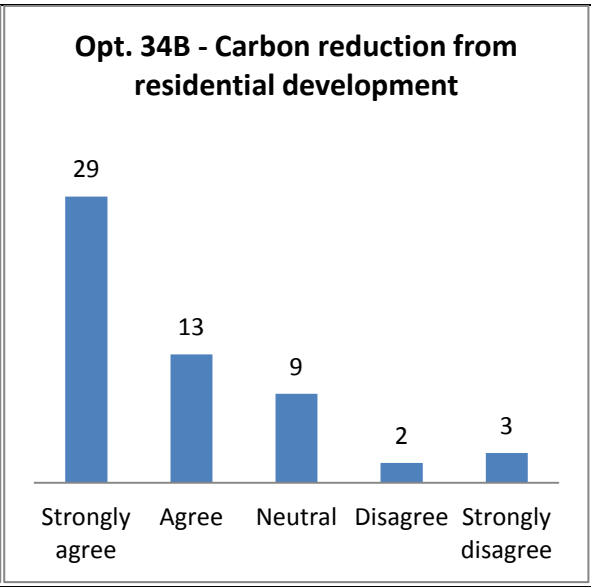
Additional Comments

This policy was mainly supported, however, of those additional written comments which raised concerns about the policy wording, some felt it did not go far enough and others that the policy could be a barrier in attracting new business into the city and could reduce viability.

How these comments were taken into account in the proposed submission draft

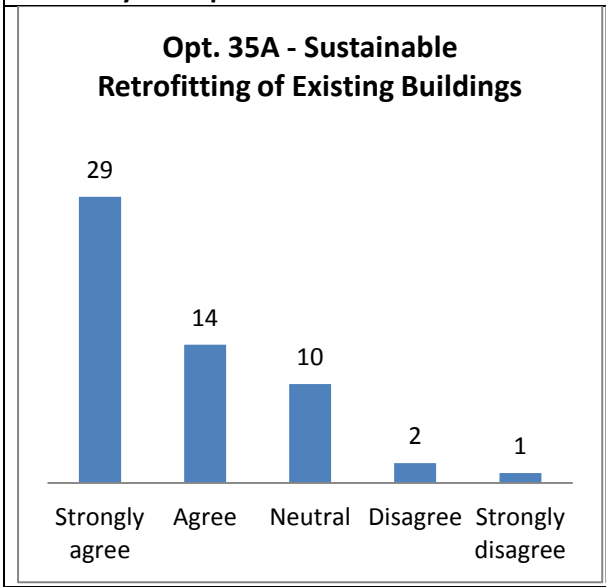
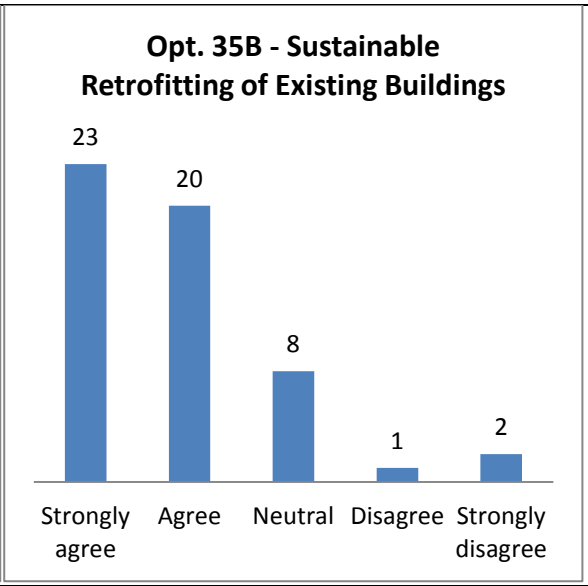
This preferred option is represented in policy RE1. Viability testing, as well as careful consultation and engagement with relevant experts, was undertaken in order to ensure the practicability of the policy requirements, as per concerns expressed in the preferred options consultation. An escalator mechanism was introduced into the policy in order to raise ambitions for future development as time passes.

Opt. 34: Carbon reduction from residential development (not mutually exclusive)

Summary or responses
 
Additional Comments
Additional written responses expressed support for this preferred option with a number of responses looking for the wording of the option to be future proofed to ensure any design takes account of changes to renewable technologies. Concern was expressed about the costs that could occur and the impact this would have on the costs for delivering social housing.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE1. Viability testing, as well as careful consultation and engagement with relevant experts, was undertaken in order to ensure the practicability of the policy requirements, as per concerns expressed in the preferred options consultation.

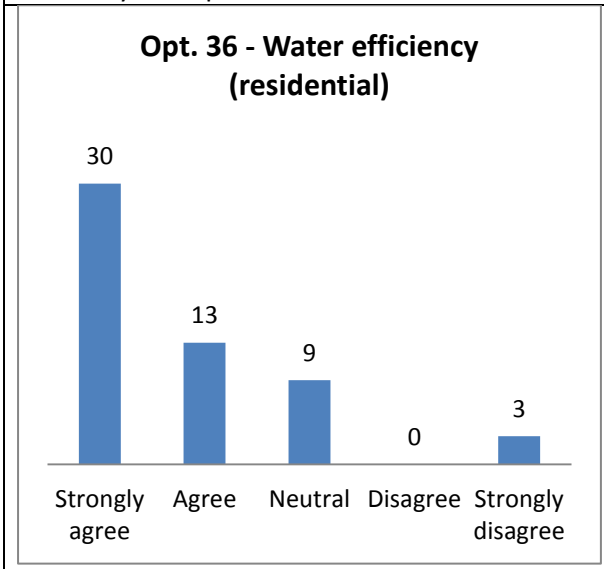
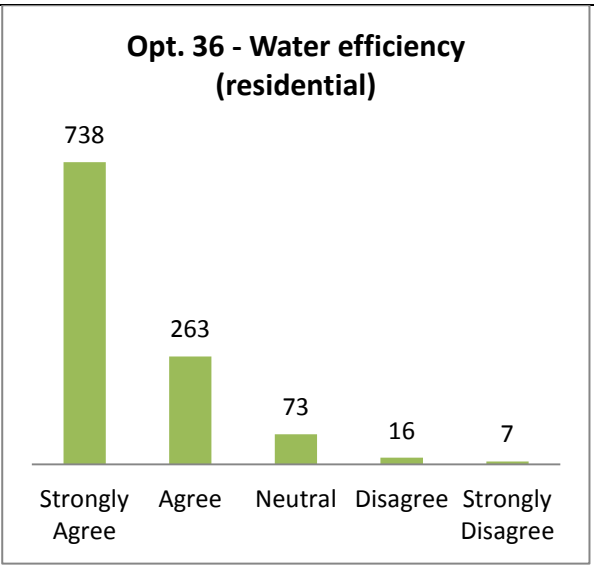
Opt. 35: Sustainable retrofitting of existing buildings

Summary of responses
 
Additional Comments

Additional written comments received were in the main supportive of this preferred option. However, questions were raised about funding of the retrofitting and ensuring it is sympathetic to historic buildings.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE1. Broad support was expressed at the preferred options stage, with the reservations that were raised expressing concern about the impact on heritage assets. A substantial portion of the supporting text introducing policy RE1 is dedicated to discussion of retrofitting existing buildings, with specific mention of the challenges and concerns related to heritage buildings and Listed Buildings. The OLP2036 supports all measures to retrofit existing heritage buildings, subject to it being done in a sensitive manner, and has developed Technical Advice Notes and Toolkits in order to facilitate successful achievement.

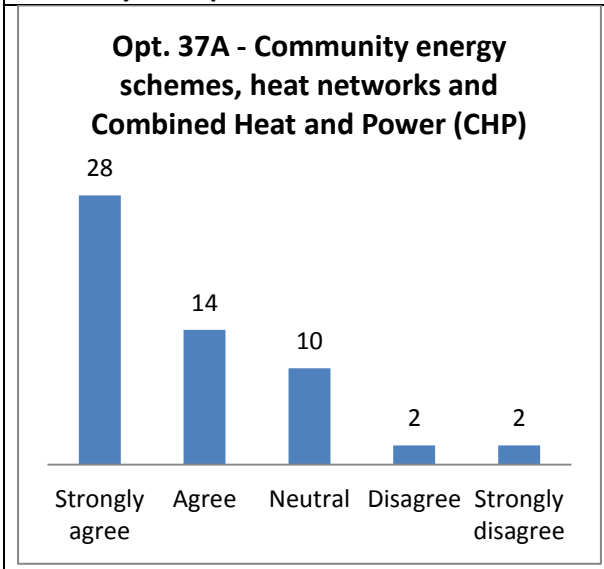
Opt. 36: Water efficiency (residential)

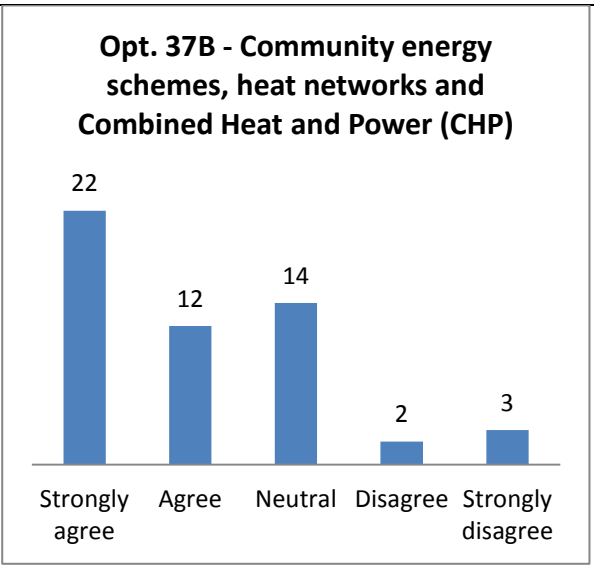
Summary of responses
 
Additional Comments
Of the additional written responses received, eight respondents supported the preferred option. Two respondents considered that option B (requiring further water efficiency measures) was a better approach. One respondent considered that Option A could be expanded upon to include further water efficiency aspects of option B within the preferred option. Three respondents considered that more emphasis should be placed on grey water recycling. One respondent considered a threshold of ten dwellings should be applied to the policy while another considered that rainwater harvesting should be mandatory for all new build.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE1. Careful consultation and engagement with relevant experts was undertaken in order to ensure the practicability of the policy requirements.

Opt. 37: Community energy schemes, heat networks, and Combined Heat and Power (CHP)

Summary of responses





Additional Comments

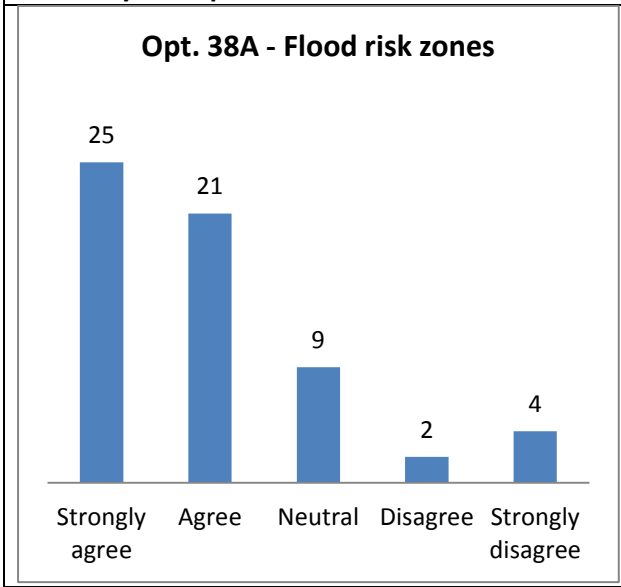
All additional written responses to this option were broadly supportive of the need to secure energy from renewable/ low carbon sources. Five respondents supported the policy approach but one respondent did not think that the preferred options went far enough in terms of future-proofing (e.g. ensuring that new developments can connect to a heat network at a later date). One respondent considered that technology options for "community energy schemes" should be widened to include other sources of renewable and low carbon energy generation.

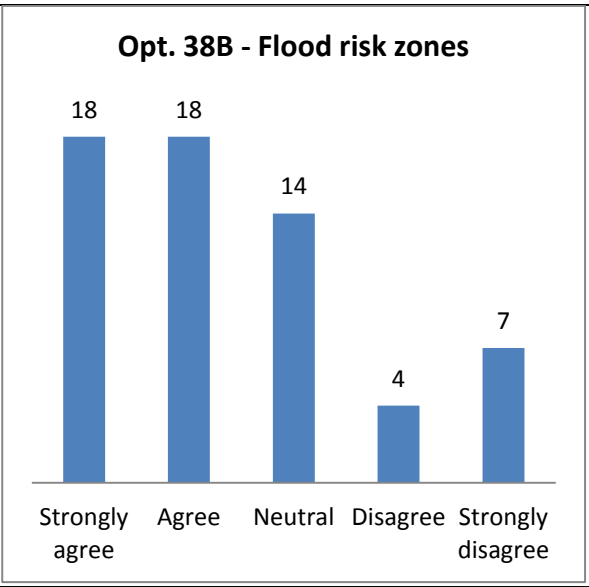
How these comments were taken into account in the proposed submission draft

This preferred option is represented in policy RE1. The general support taken from the preferred options consultation has manifested itself in text within the policy that expresses encouragement and support for the development of city-wide heat networks and for the expectation for new schemes to connect to heat networks should they be in close proximity, with burden of evidence being placed on the choice to not connect to a network .

Opt. 38: Flood risk zones

Summary of responses





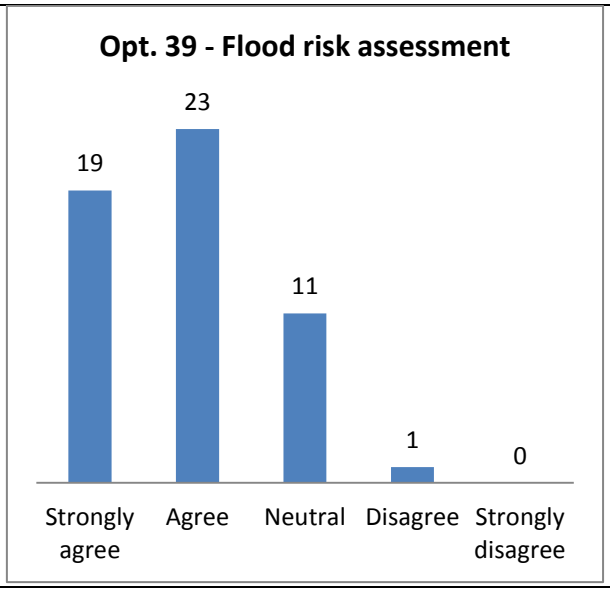
Additional Comments

Of the additional written responses received, four respondents supported the preferred options as set out in the preferred options document and two respondents supported only one or other of the options that made up the preferred options. One respondent considered that the policy should clearly define the 'developed' and 'undeveloped' floodplain in order to provide clarity and ensure that development did not increase off-site flood risk. One respondent considered that development proposals in FZ3b developed should not allow any increase in built footprint. Ten respondents considered that non-porous driveways should be discouraged.

How these comments were taken into account in the proposed submission draft

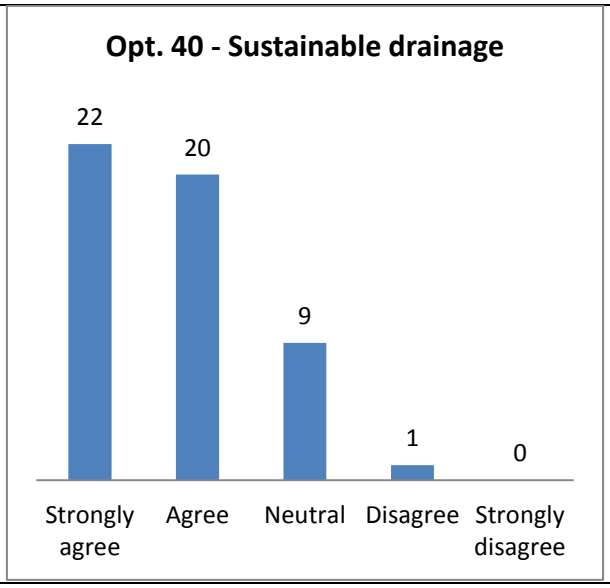
This preferred option is represented in policy RE3. In response to calls for clarity and precision from the preferred options consultation, the resulting policy wording is detailed and addresses specific situations. The policy is in line with national policy and with consultation feedback in that it directs development towards areas of low flood risk and will not permit innappropriate development in high-risk flood zones. Requirements for detailed flooding assessments are set out in the policy to address any potential remaining concerns.

Opt. 39: Flood risk assessment

Summary of responses

Additional Comments
Of the additional written responses received, two respondents supported the preferred options. One respondent considered that support should be given to the OFAS scheme. One respondent considered that more in-depth modelling should be undertaken. One respondent considered that co-ordination with the surrounding districts should be undertaken. One respondent disagreed with the preferred options and one supported option C. One respondent considered that detailed groundwater monitoring should be undertaken by the City Council.

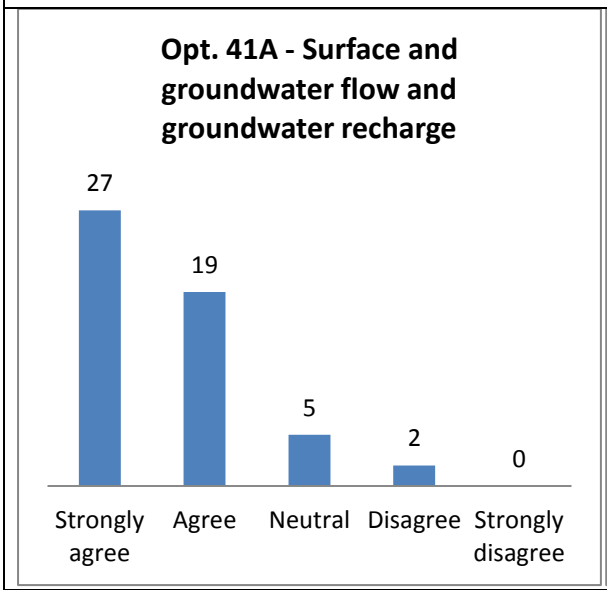
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE3. In response to calls for clarity and precision from the preferred options consultation, the resulting policy wording is detailed and addresses specific situations. The policy is in line with national policy and with consultation feedback in that it directs development towards areas of low flood risk and will not permit innappropriate development in high-risk flood zones. Requirements for detailed flooding assessments are set out in the policy to address any potential remaining concerns.

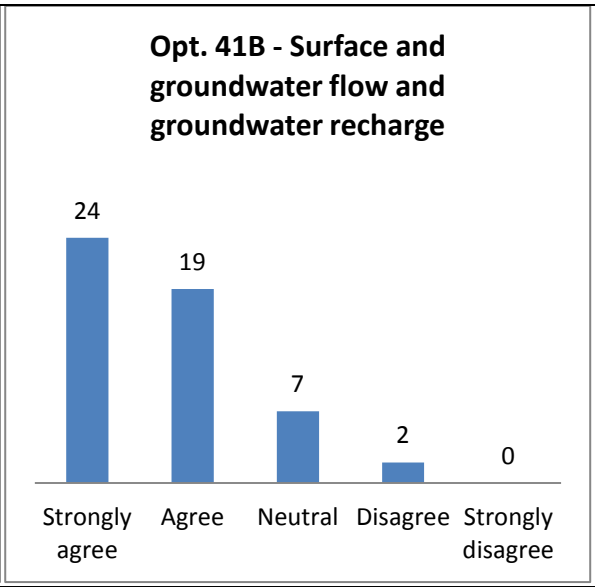
Opt. 40: Sustainable drainage

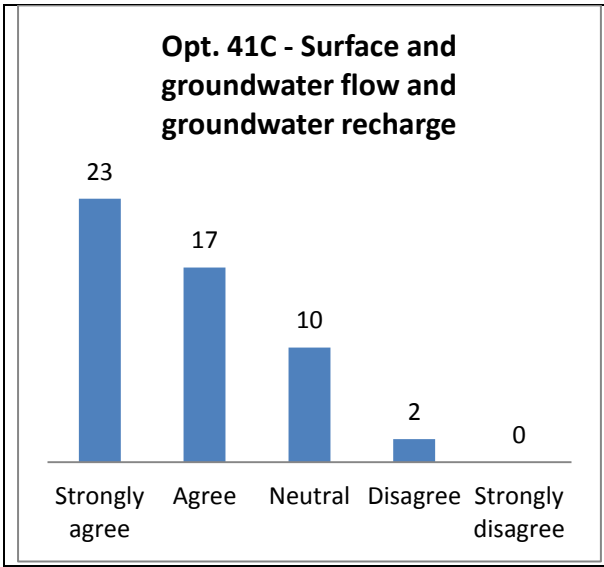
Summary of responses

Additional Comments
Of the additional written responses received, six respondents supported the preferred options. One respondent considered that more should be done in terms of maintenance of SuDS systems and one respondent considered that where SuDS was not feasible then development should not happen on that site. One respondent was pleased to see that special consideration to the Lye Valley SSSI was being considered but thought that more should be done in terms of catchment protection.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE4. The broad support expressed at the preferred options stage has been brought through into the policy, with specific mention of sensitive environments like Lye Valley SSSI and Oxford Meadows SAC given extra emphasis in the policy text.

Opt. 41: Surface and groundwater flow and groundwater recharge







Additional comments

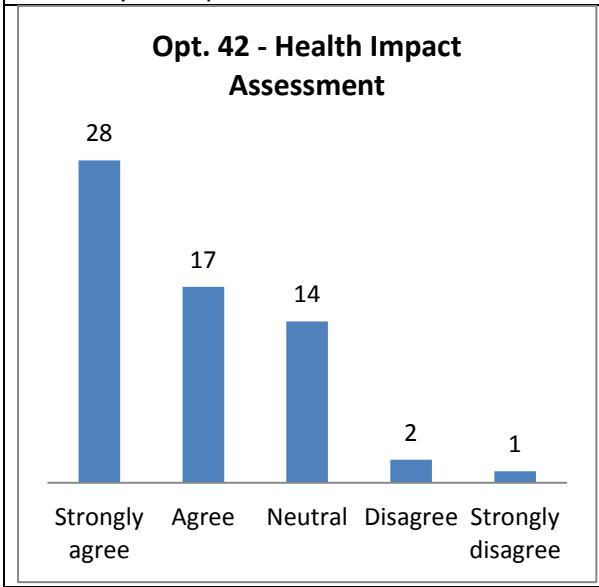
Of the additional written responses received, three respondents supported the full suite of preferred options and twenty-seven respondents supported two out of the three preferred options. Twenty-seven respondents expressed concerns about the Lye Valley SSSI. They were concerned that not enough of the catchment area that provides water to the SSSI was being protected from development. Within an enlarged catchment area the respondents consider that no greenfield development should take place. One respondent considered that, in relation to the Lye Valley SSSI, the policy should apply to a defined area and seek to improve groundwater recharge and management of surface water flows. One respondent disagreed with the approach and considered that the policy should only focus on those projects likely to have an identifiable effect.

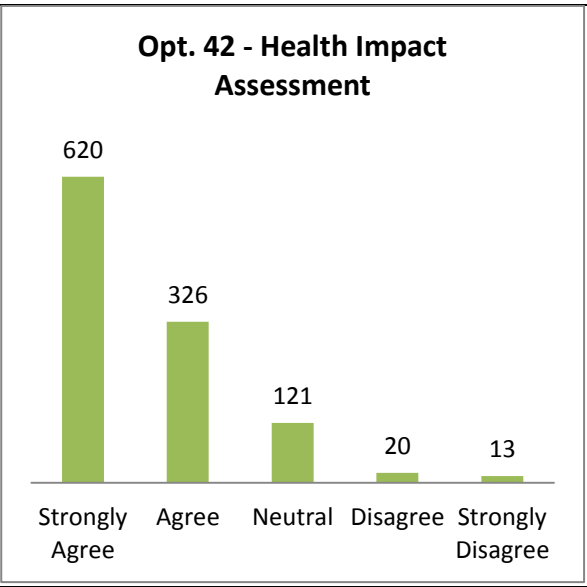
How these comments were taken into account in the proposed submission draft

This preferred option is represented in policy RE4. The broad support expressed at the preferred options stage has been brought through into the policy, with specific mention of sensitive environments like Lye Valley SSSI and Oxford Meadows SAC given extra emphasis in the policy text to ensure careful attention.

Opt. 42: Health Impact Assessment

Summary of responses





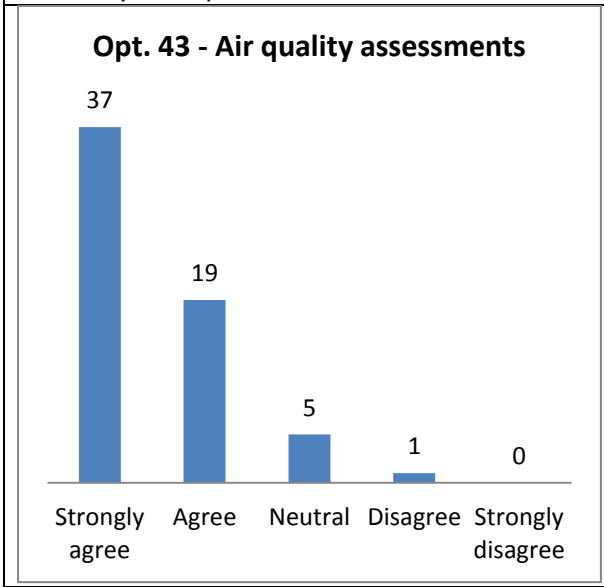
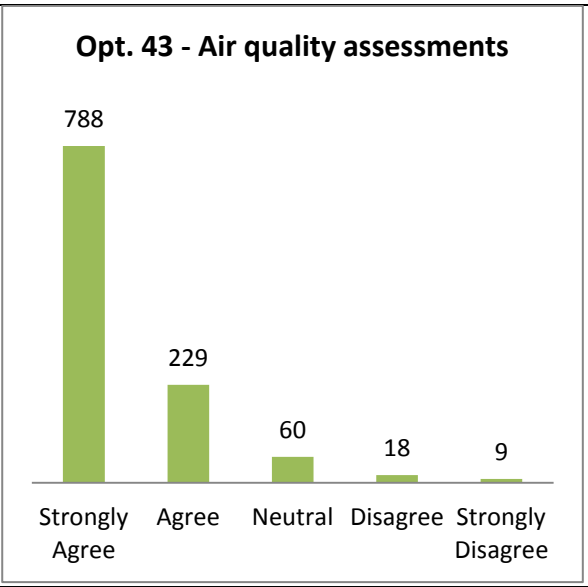
Additional comments

Of the additional written responses received, there was lots of support for the principle of HIA and comments must extend to include cycle access and on-site cycle parking. In addition, HIAs should be done in tandem with air quality assessments and climate impact assessment to ensure that developments are fit for a city moving towards zero carbon status. A number of comments considered that HIA should be undertaken for all developments regardless of size and the wording major developments should be altered to included medium and small developments. Oxford policies can address the gaps in the policy framework by emphasising the link between health and walking and cycling. On the other hand some comments received emphasised the bureaucratic nature of these HIAs and that they add little to achieving good outcomes for development.

How these comments were taken into account in the proposed submission draft

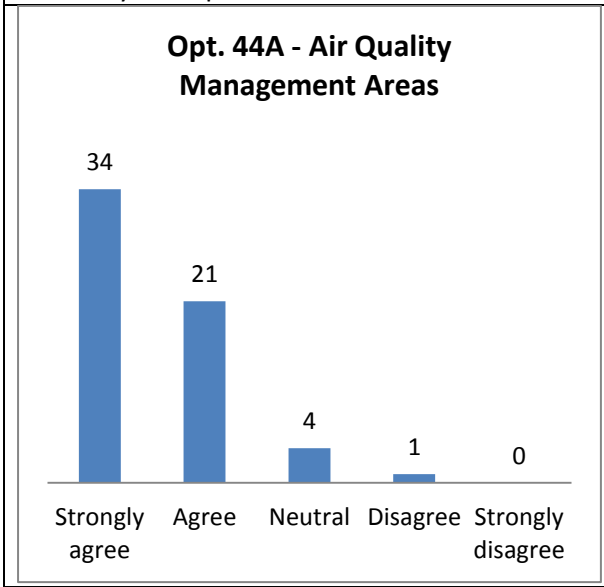
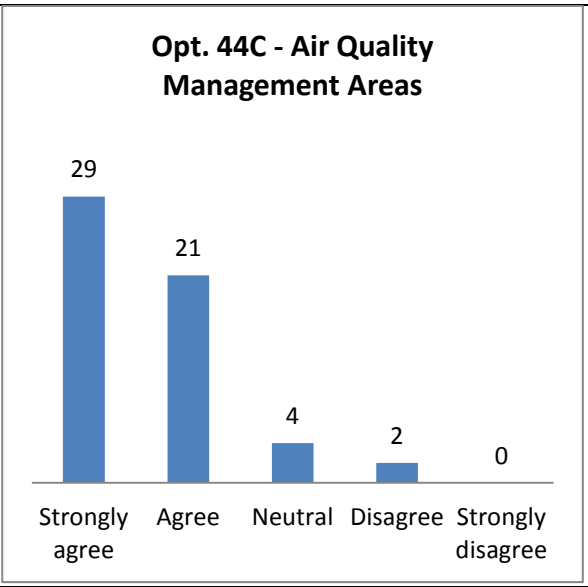
This preferred option is represented in policy RE5. Strong support was expressed for HIA and this was brought through into the policy with a requirement for HIA submission to accompany all major development proposals – although viability and concerns related to potential overburdening of applicants (as expressed in the preferred options consultation) was the reason for its requirement not being extended beyond major development proposals.

Opt. 43: Air quality assessments

Summary of responses
 
Additional comments
Of the additional written responses received, there was a lot of support for this PO with many responses seeking more from future policies to ensure that the issue of air pollution is a priority. It was considered that there needed to be something done about air quality not just an assessment. Diesel vehicles should be banned from entering the city and more should be done to encourage electric vehicles. Other comments felt that the need for AQAs was irrelevant as technology is changing and there is a move away from fossil fuels towards electric vehicles.

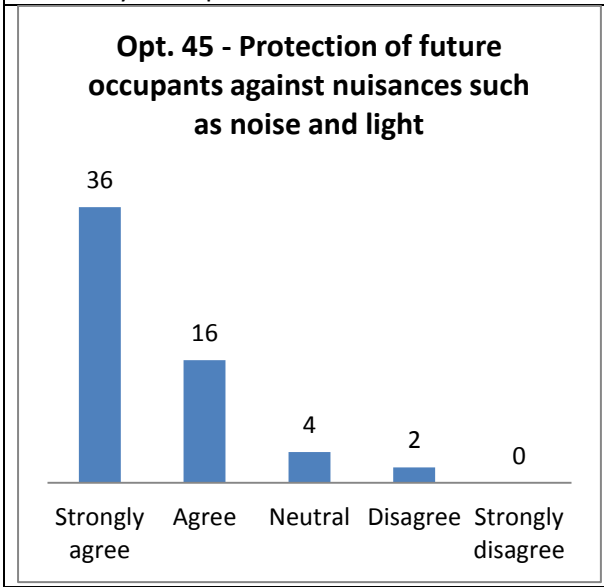
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy HE6. Strong concern related to air quality, and strong support for improvements in air quality, has been brought through into the policy wording. Support for banning polluting vehicles from the city centre is addressed through Oxford City Council's ambition for a Zero Emission Zone, with this policy written to complement such ambitions.

Opt. 44: Air Quality Management Areas

Summary of responses
 
Additional comments
Of the additional written responses received, all comments received were supportive of including a policy relating to AQMAs, often the comments received asked for even more measures to be introduced to enable better air quality to be achieved, such as a Zero Emissions Zone or congestion charging.

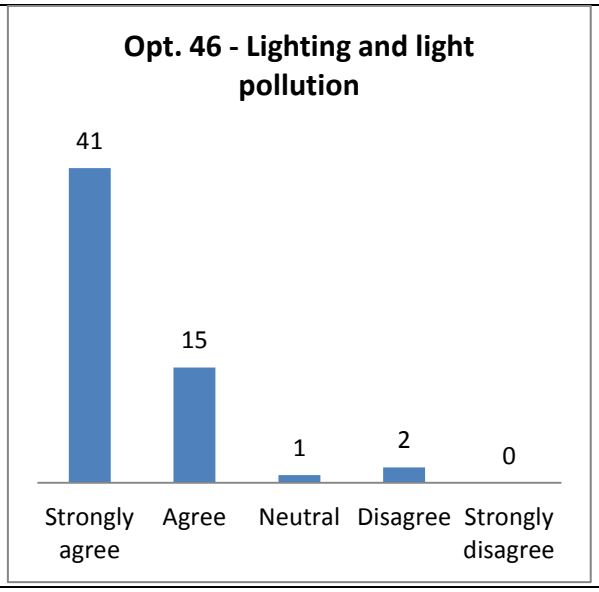
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy HE6. Strong concern related to air quality, and strong support for improvements in air quality, has been brought through into the policy wording. Support for dramatic measures to improve air quality in specific areas like the city centre is addressed through Oxford City Council's ambition for a Zero Emission Zone, with this policy written to complement such ambitions.

Opt. 45: Protection of future occupants against nuisances such as noise and light

Summary of responses

Additional comments
Of the additional written responses received, most comments received were supportive of the PO although some comments were concerned that by introducing different policies like this into Oxford compared to outside of it could cause additional delays and reduce the delivery of timely developments. Also no need for a policy as national policies and guidance are sufficient.

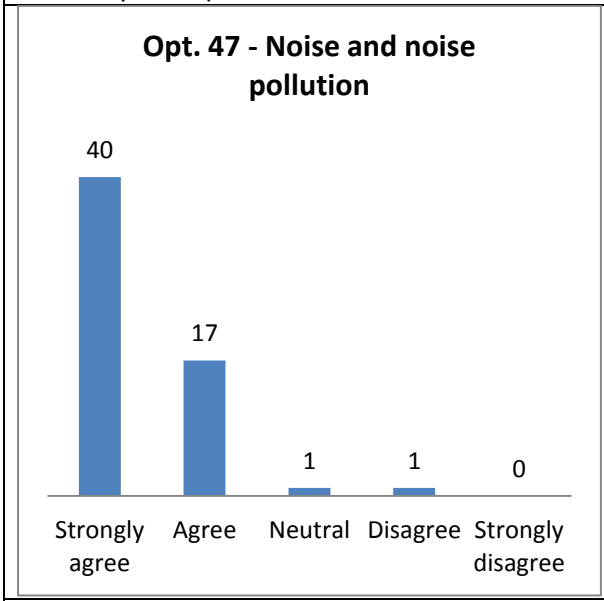
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE7 and RE8. The policies strike a balance between the support expressed for measures to protect residents against nuisance, with the arguments stating that it's an extra burden and unecessary. Policy RE7 reflects this balance by including consideration of nuisance factors as part of the determination process. Policy RE8 places additional emphasis on considerations and concerns related to noise, and requires evidence to demonstrate that such concerns will not arise.

Opt. 46: Lighting and light pollution

Summary of responses

Additional comments
Of the additional written responses received, the comments received were largely supportive of having a policy related to controlling light and light pollution. Those that responded gave examples as to how to design lighting to reduce light spill to benefit both humans and wildlife. Those against such a policy felt it would be unnecessarily bureaucratic and that each development should be considered on a case by case basis.

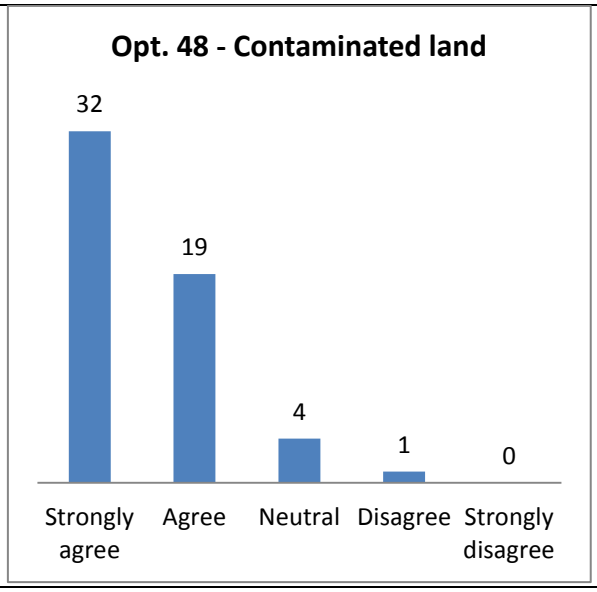
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE7. The policy strikes a balance between the support expressed for measures to protect residents against nuisance, with the arguments stating that it's an extra burden. The policy text reflects this balance by including consideration of nuisance factors as part of the determination process, and maintaining aspects of the existing daylight/sunlight assessment measures.

Opt. 47: Noise and noise pollution

Summary of responses

Additional comments
Of the additional written responses received, there was support for this preferred option. Respondents raised concern about noise pollution from A34, AirBnB properties, and ambulance, and police sirens.

How these comments were taken into account in the proposed submission draft
This preferred option is represented in policies RE7 and RE8. Policy RE7 includes consideration of nuisance factors as part of the determination process. Policy RE8 places additional emphasis on considerations and concerns related to noise, and requires evidence to demonstrate that such concerns will not arise.

Opt. 48: Contaminated land

Summary of responses


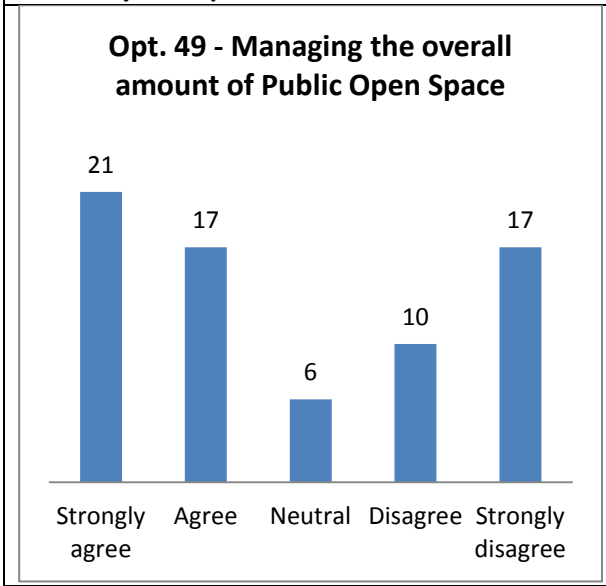
Additional Comments
Of the additional written responses received, support was expressed for this PO. However, EA noted that there may be further investigation needed for some of the sites identified in Table 5: Sites Recommended for Further Investigation.

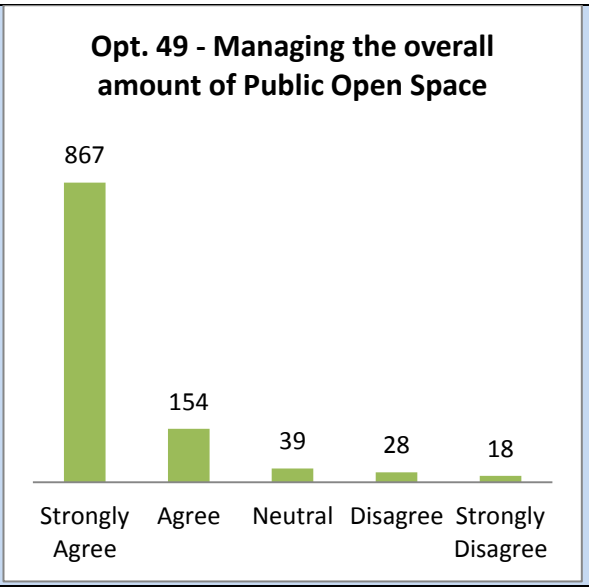
How these comments were taken into account in the proposed submission draft
This preferred option is represented in policy RE9. The policy responds to the support expressed in the preferred options consultation by outlining requirements for a detailed report to be submitted in accompaniment of a planning application when the proposal might be affected by contamination. Where the report identifies a need for mitigation measures, the policy requires this.

C5: Protecting and enhancing Oxford's green setting, open spaces, and waterways

Opt. 49: Managing the overall amount of Public Open Space in Oxford

Summary of responses





Additional Comments

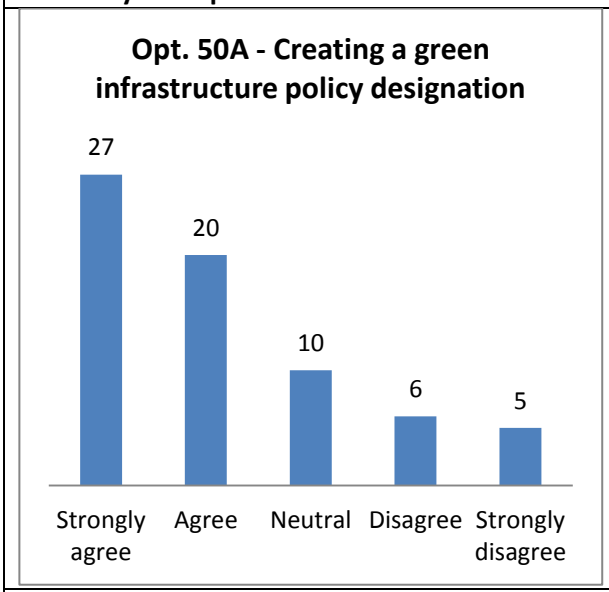
The largest number of additional comments received said that there should not be any loss of green space in Oxford. Whilst there was some support for the approach of not setting a target for the total quantity of public open space across the city, there were also comments suggesting that the standard in the Green Space Strategy should be applied, or that a fixed ratio of green space to population should be used, particularly given expected population growth. The consultation leaflet asked whether the loss of important green spaces should only be allowed in exceptional circumstances. A number of people asked for more detail on what the exceptional circumstances might be and how the importance of green spaces would be assessed. There were also comments suggesting that any green spaces that are currently in poor condition should be improved rather than developed.

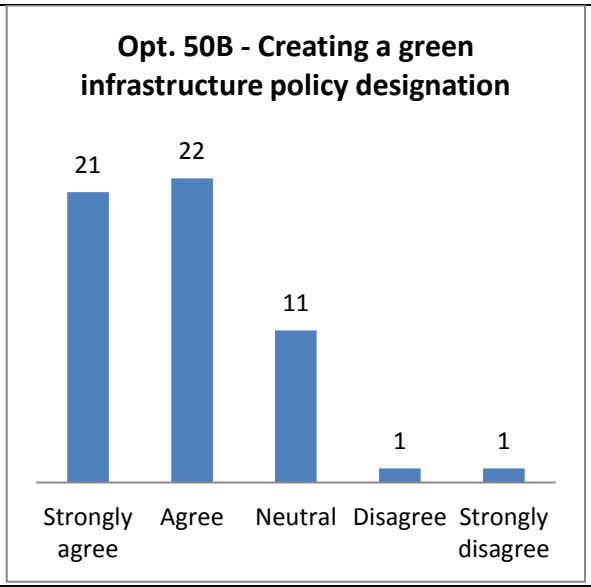
How these comments were taken into account in the proposed submission draft

The proposed submission draft contains a number of policies that aim to preserve the highest amount possible of quality public open space in the city. The key policy is G1, which protects important green and open spaces and waterways as part of the Green and Blue Infrastructure network. These spaces are defined on the Policies Map and are to be free from development that results in any loss of area, except where demonstrated that an equivalent replacement will be provided or where there would be net improvement or not net harm to any biodiversity function. The Council approach is based on the preferred option, whereby there is no overall fixed ratio of green space to population, however there are other policies in the proposed submission draft that encourage the provision of usable green spaces across the city and prevents the unnecessary losses. A separate policy G4 addresses the Green Belt and prohibits inappropriate development in designated Green Belt land. Policy G7 addresses other green spaces that are not part of the designated Green network and as such may not come under the protection of policy G1, with restrictions on the loss of such spaces to development except under very specific circumstances.

Opt. 50: Creating a green infrastructure policy designation

Summary of responses





Additional Comments

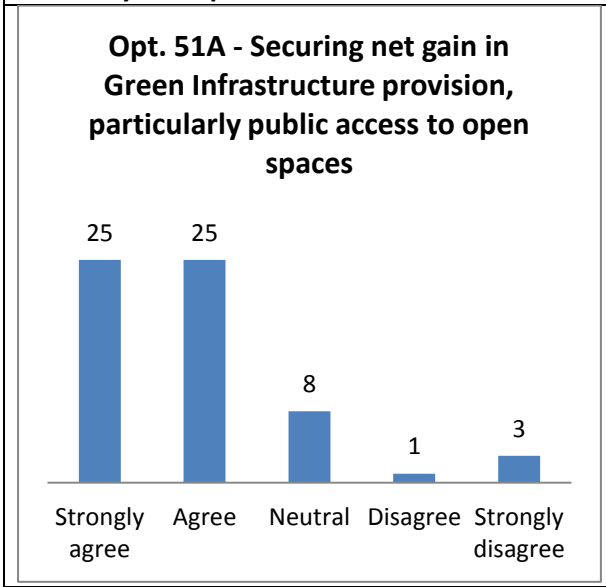
A large number of responses signalled support for the preferred options of creating a green infrastructure designation – particularly from institutions and organisations. Numerous comments noted the importance of defining the target and criteria used to designate spaces as green infrastructure and worthy of protection. Other comments welcomed the idea of valuing and assessing green space as a network, rather than individual sites, but also expressed concern that those sites which are isolated will slip through the cracks and not be valued equally. A few comments noted the benefits of identifying the value and purpose of certain green spaces as they compare to others, whilst a few other comments worried that identification and classification could result in a lower valuation and resulting loss of certain specific types of green space.

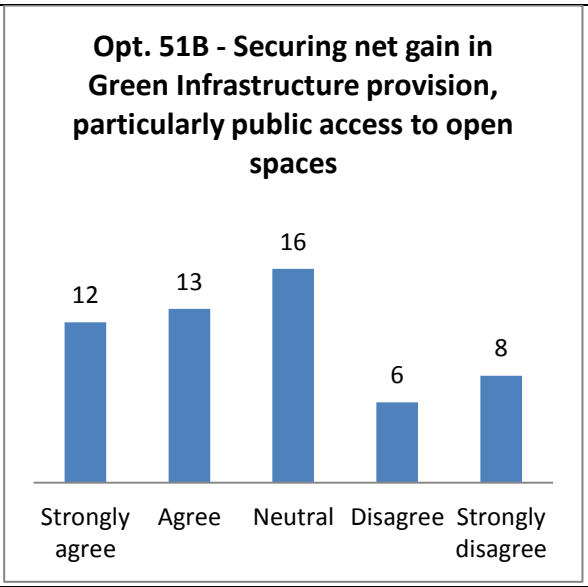
How these comments were taken into account in the proposed submission draft

Policy G1 represents aspects of both preferred options and aims for the protection of a green and blue infrastructure network. Many green spaces that are not joined to other green spaces are still proposed as part of the Green Infrastructure Network, because of their benefits and functions. Separate polices have been written addressing specific areas such as sports pitches, biodiversity sites and allotments.

Opt. 51: Securing net gain in Green Infrastructure provision, particularly public access to open spaces

Summary of responses





Additional Comments

The general trend of responses was in support of the preferred options. Numerous comments were received that complained of loss of green spaces, and argued that the preferred options need to be even stronger. Many comments noted the importance of having green spaces near to people's homes and to avoid placing all focus on large sites. Numerous comments expressed opposition or concern to preferred option B based on a belief that it could facilitate a loophole that would allow developers to dodge provision of green space. Several comments related to concerns about the value, quality, and utility of 'small green spaces or parks'. A few comments queried the possibility of creating public green space on private land. Several comments expressed support for alternative option C.

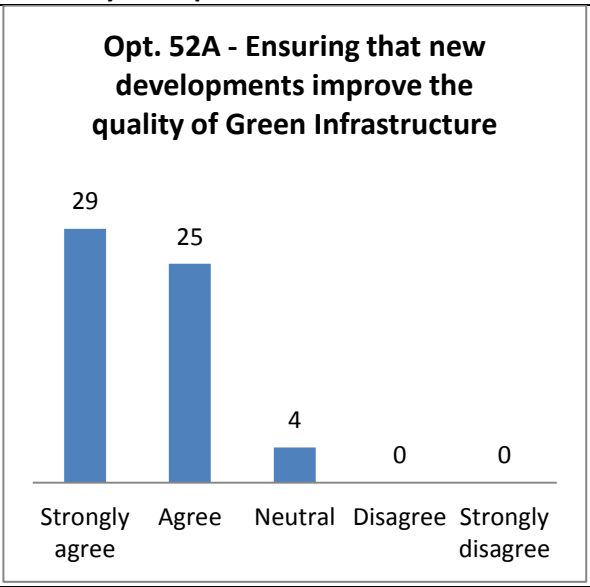
How these comments were taken into account in the proposed submission draft

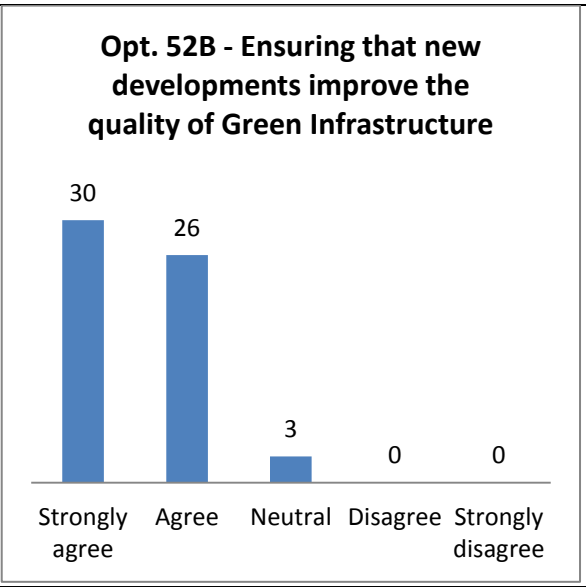
Aspects of both preferred options have been integrated into the proposed submission draft. Policy G9 sets out the objective of promoting the development of new additions and enhancements to the green infrastructure network. It contains a requirement for residential developments larger than 1.5 ha to provide a minimum amount of public open space (10%) along with contributions to its maintenance where appropriate. The approach of applying this requirement on the basis of site area rather than number of units (as per the alternative option C) is followed because many development sites in oxford tend to be small even where a number of units are proposed. The resultant public green spaces may be too small to be of much social or environmental benefit.

Policy G7 addresses other green spaces that are not part of the designated Green network and as such may not come under the protection of policy G1, with restrictions on the loss of such spaces to development unless under very specific criteria. A key requirement will be for a developer to show that proposals would improve biodiversity or amenity.

Opt. 52: Ensuring that new developments improve the quality of Green Infrastructure

Summary of responses





Additional Comments

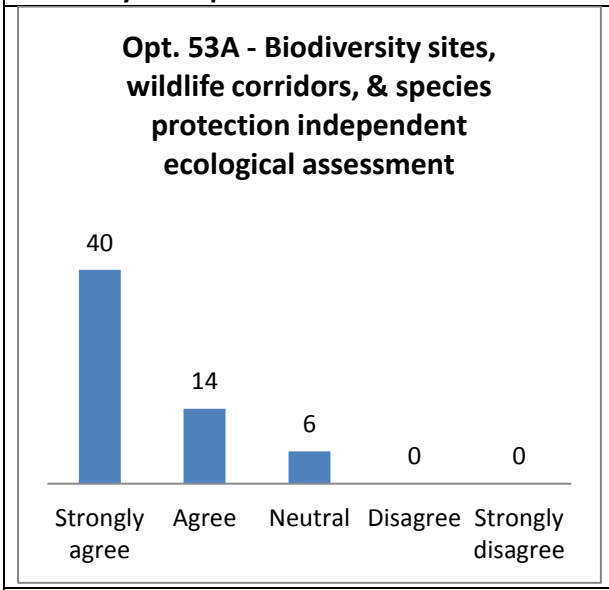
The general trend of responses was in support of the preferred options. Several comments were received arguing that the preferred option is not strong enough in attempting to achieve its goal. A few comments were received stating that they support the principle but will require further detail in order to make an informed conclusion (specifically the exact wording of what would be required, and to what extent). Other comments suggested the inclusion of heritage considerations and active design principles as additional requirements.

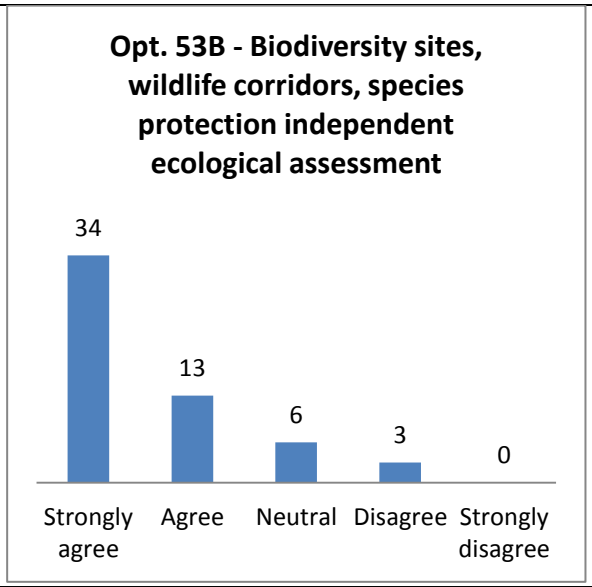
How these comments were taken into account in the proposed submission draft

Policy G9 sets out the objective of protecting and enhancing green infrastructure, and would apply to both protected and unprotected green infrastructure. The policy is worded so that any proposals that affect these features are required to show how they are incorporated into schemes and improved in specific areas listed in the policy text. Heritage considerations and other design principles are addressed in other policies.

Opt. 53: Biodiversity sites, wildlife corridors, species protection, independent ecological assessment (accounting)

Summary of responses





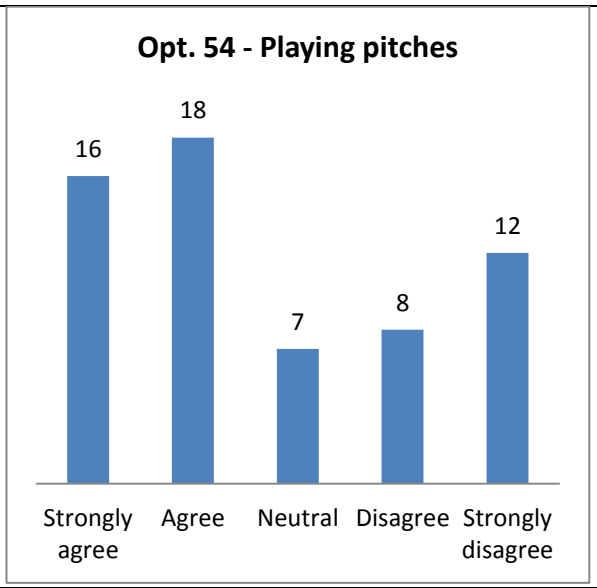
Additional Comments

The importance of biodiversity and wildlife is made clear by the vast majority of the comments received. Many comments indicated that they believed the preferred options were not strong enough and that mitigation/compensation strategies could never adequately or appropriately replace wildlife or biodiversity that would be inevitably lost through development works. A good deal of support was made for the principle of the 'avoid, mitigate, compensate' hierarchy outlined in preferred option B. The majority of comments stressed the importance of wildlife and biodiversity, its fragility, and the failure of development in being located in sensitive locations and in being done in sympathetic terms.

How these comments were taken into account in the proposed submission draft

The support is welcomed and the comments noted.
Policy G2 addresses the protection of diversity and geodiversity sites and incorporates elements of both preferred options. Protection is extended to sites of local importance, whereby development is permitted only in exceptional circumstances. The requirement is for mitigation and compensation measures to offset any losses and achieve an overall net gain for biodiversity.

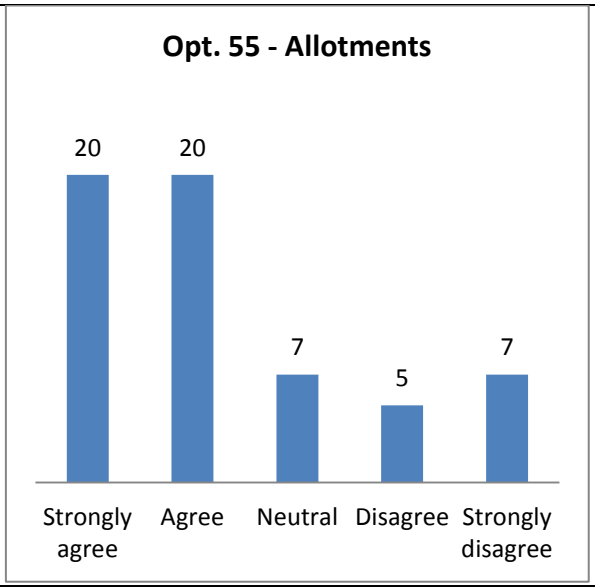
Opt. 54: Playing pitches

Summary of responses


Additional Comments
Majority support in comments for Rejected Option C and that no playing pitches should be lost under any circumstances. Numerous comments articulated an understanding that some pitches may be lost through need or circumstance but that an appropriate assessment needs to be done and other avenues be explored before loss, and that replacement nearby should be secured. Several comments noted the importance of playing pitches for schools and in the public domain as access to private playing pitches is not often granted to the community. Several comments also noted that should a playing field not be required anymore, it ought to be retained as a green space as insurance for potential future need.

How these comments were taken into account in the proposed submission draft
The preferred option has been integrated into the proposed submission draft through policy G5, which specifically addresses the protection outdoor sports facilities. The preferred option was chosen as a blanket prohibition on the loss of playing pitches under any circumstances was considered to be too inflexible an approach to allow for responses to supply and demand over time, as well as the loss of opportunities to make more efficient uses of land as required. The policy cites the Playing Pitch Study, which identifies the different types of playing pitches and the level of need. Proposals involving the loss of outdoor facilities are required to make compensation in the form of improved facilities in suitable locations of equal or better accessibility by walking, cycling or public transport.

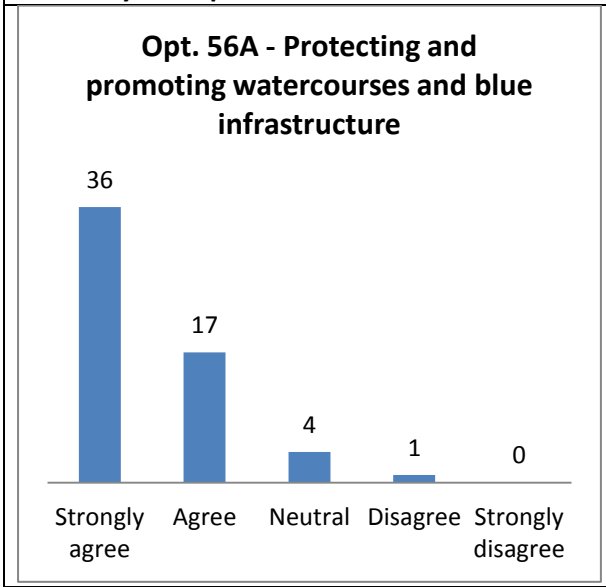
Opt. 55: Allotments

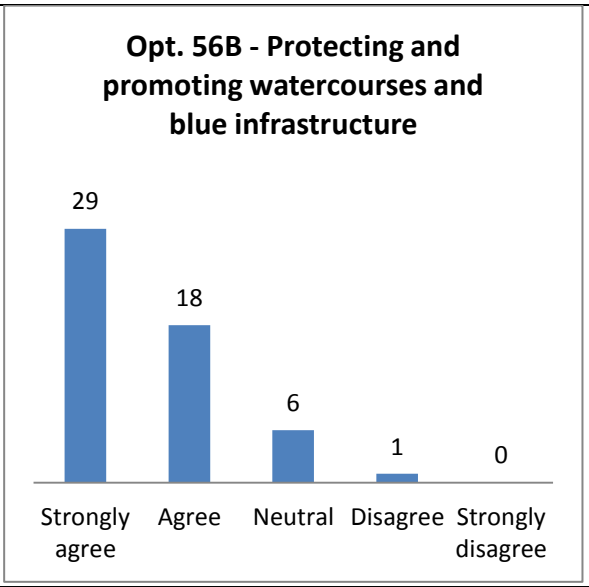
Summary of responses

Additional Comments
Majority support expressed in the comments for blanket protection of allotments (Alternative Option B) and that no allotments should be lost under any circumstances. Numerous comments received noting the benefits of allotments, the high demand for them, and that communities cannot afford to lose any more. Other comments noted support for the preferred options and pointed out that allotments are already quite well protected, so criteria for loss should be clearly laid out.

How these comments were taken into account in the proposed submission draft
The strong protection of allotment land will continue, and is included in the proposed submission draft as policy G4. The approach of the policy is to prevent development resulting in the loss of designated allotment sites, which are identified in the Policies Map. The policy does not contain criteria that would allow exceptions to protection from development, and while it is not strictly a blanket protection of all allotments, focussing on the allocated sites allows for surplus sites to be omitted accordingly. The policy also encourages the provision of community food growing space as part of qualifying developments.

Opt. 56: Protecting and promoting watercourses – making more of blue infrastructure

Summary of responses





Additional Comments

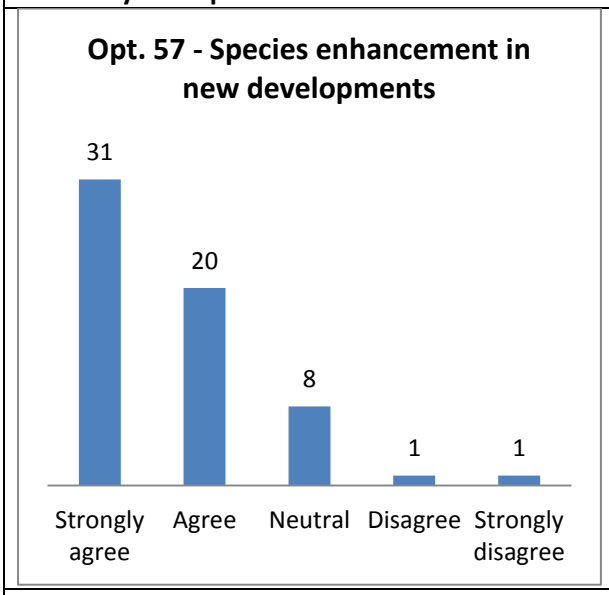
Many comments received expressed strong support for notion of protection for watercourses and blue infrastructure. A few comments advocated the separation of *protection* and *promotion* of watercourses and that the watercourses would be best served by being left natural. Other comments noted the importance of watercourses and blue infrastructure, and the excellent potential they hold in Oxford. Some comments noted the possible benefits of using cycle and walking path development as a tool to improve the protection and promotion of watercourses. Generally, support for protection of watercourses and blue infrastructure is expressed, whilst caution is expressed about their development.

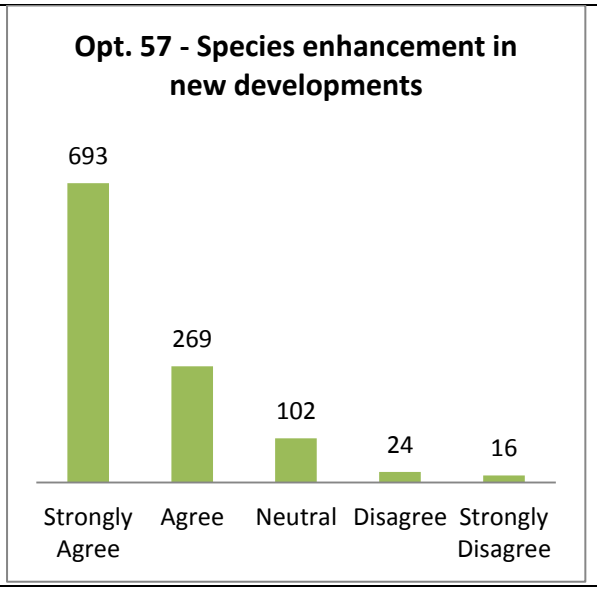
How these comments were taken into account in the proposed submission draft

The general support for the preferred option is welcomed. The key policy is G1, which protects important green and open spaces and waterways as part of the Green and Blue Infrastructure network. Important waterways are defined on the Policies Map and are to be free from development that results in any loss of area, except where demonstrated that there is an equivalent reprovision or where there would be net improvement or not net harm to any biodiversity function.

Opt. 57: Species enhancement in new developments

Summary of responses





Additional Comments

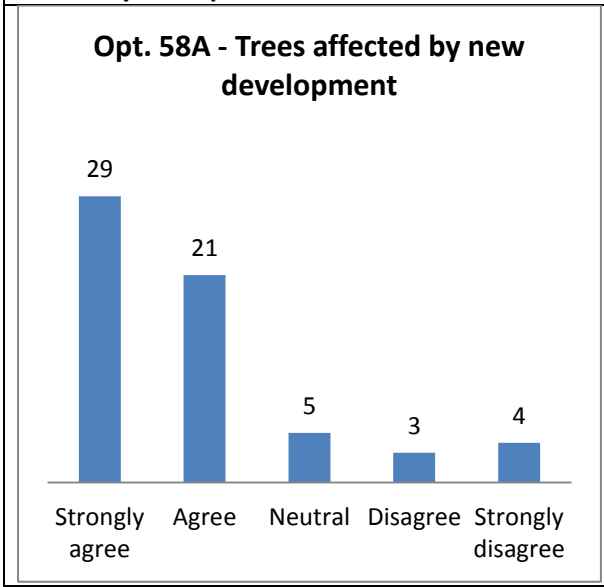
The majority of comments expressed support for the preferred options. Following that, a few comments encouraged redevelopment of parts of the city which lack ecological quality and took both sides of a debate around the stipulation that new planting be that of native species.

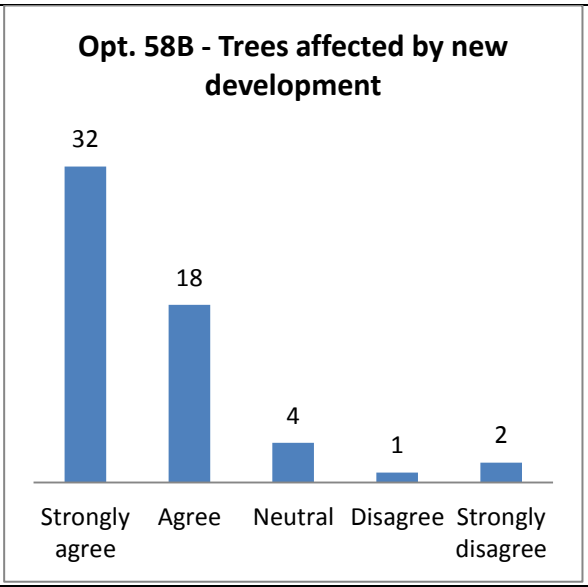
How these comments were taken into account in the proposed submission draft

The general support for the preferred options is welcomed.
Aspects of the preferred option are reflected in policies G2, G6 and G7. All three policies include requirements to protect the integrity of sites of biodiversity importance, and for biodiversity impact mitigation and enhancement measures on sites that may have a lower level of protection.

Opt. 58: Trees affected by new developments

Summary of responses





Additional Comments

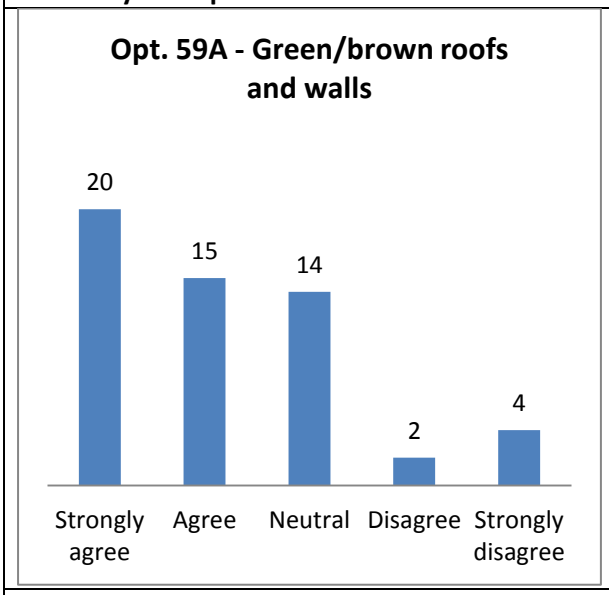
Comments made clear that strong protection for trees is supported. Generally, comments argued that the preferred options were not strong enough and that avoidance of any loss ought to be the first priority, followed by mitigation; and that replacement or compensation was generally not being carried out appropriately in practice. The importance of the value of mature trees compared to seedlings was noted, and support was voiced for obligations to be placed on the developers to ensure the good health and maintenance of any new, replacement trees.

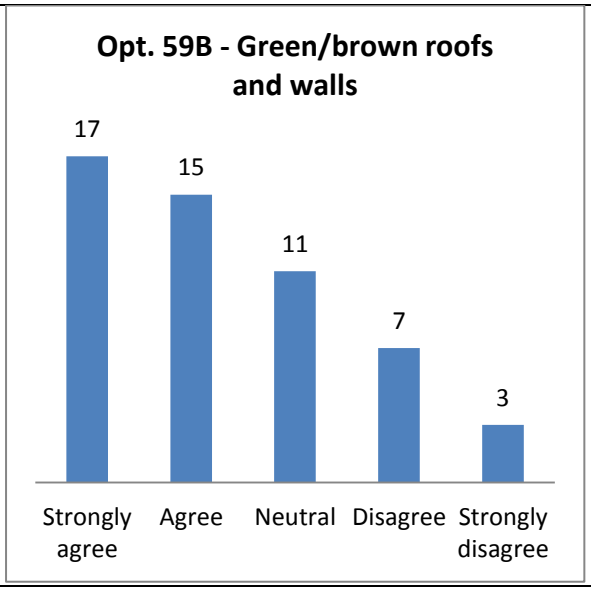
How these comments were taken into account in the proposed submission draft

Policy G9 sets out the objective of protecting and enhancing green infrastructure, and would apply to both protected and unprotected green infrastructure. This covers features such as trees, hedgerows and small green public spaces.

Opt. 59: Green/brown roofs and walls

Summary of responses





Additional Comments

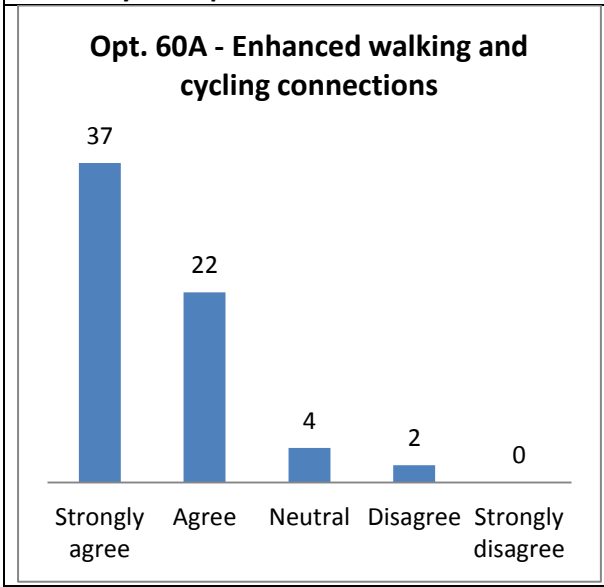
The comments demonstrated popular general support for green/brown roofs and walls. However, a large majority of comments pointed out that green/brown roofs and walls do not adequately compensate for habitat loss, and that any policy should not use green/brown roofs and walls to replace ground level green space, and that provision for biodiversity ought to still be made within the development. The conflict and varying potential benefits of green/brown roofs and walls compared to provision of solar PV was also commented on.

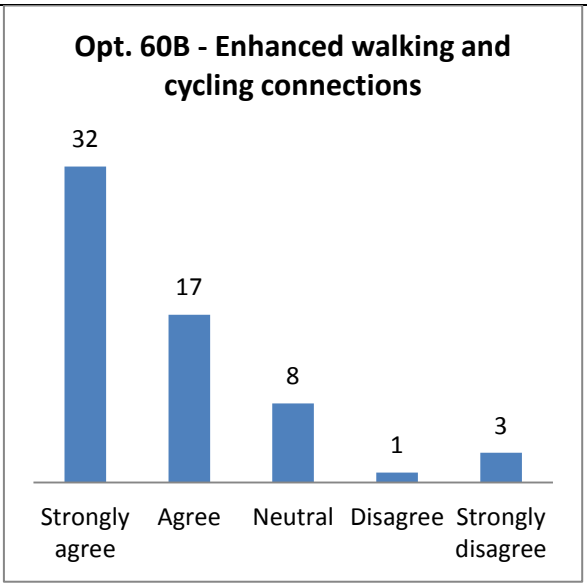
How these comments were taken into account in the proposed submission draft

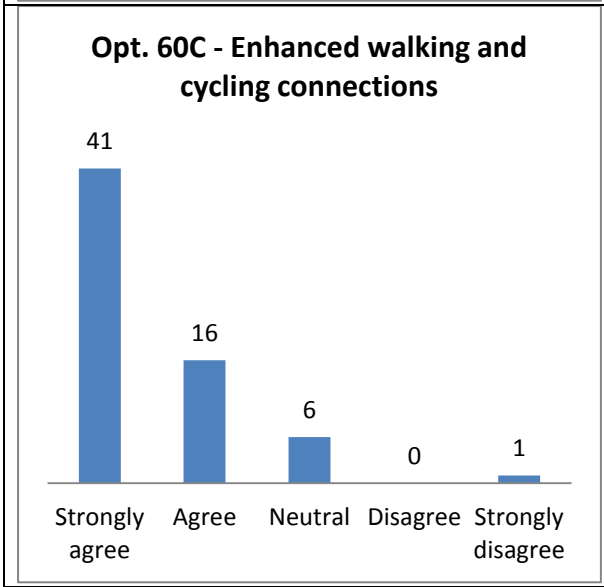
The general support of the policy approach is welcomed. Policy G9 contains a provision that supports the incorporation of green or brown roofs of suitable design into developments where possible. For all their benefits, they are however not to be deemed as compensations/mitigations for habitat loss or replacements for ground level green spaces.

Opt. 60: Enhanced walking and cycling connections

Summary of responses







Additional Comments

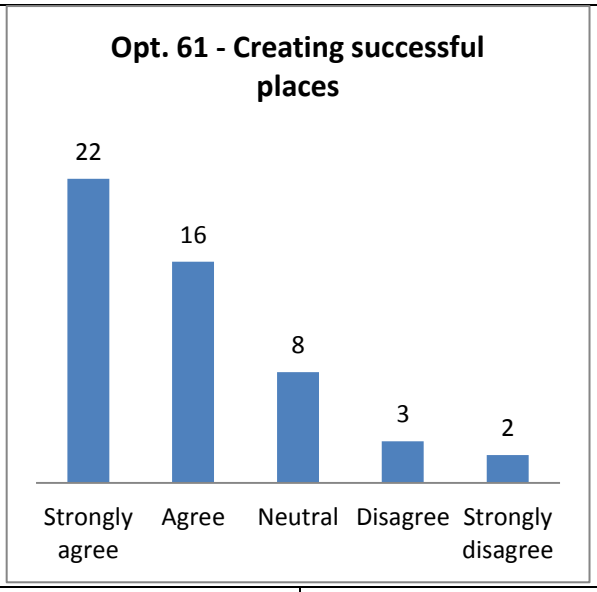
The majority of comments were in support of the preferred options. The next most common comment was in support of ensuring that any resulting new connections be well designed infrastructure that provides separate, segregated lanes for cyclists. A few comments noted the importance of footpaths and open space for their own inherent value, and that some sensitive open spaces are not well suited for transportation connections.

How these comments were taken into account in the proposed submission draft

The general support is welcomed and the comments noted.
The preferred options are reflected in Policy G9, which requires that development proposals Green Infrastructure features demonstrate how these have been incorporated within the scheme and how improvements are delivered. Among the assessed criteria are how well schemes create linkages with the wider Green Infrastructure Network and how connectivity through suitable walking and cycling routes will be encouraged. Movement policies specifically address sustainable modes of travel in more detail (policy M1) and policy G1 creates the context of the wider Green Infrastructure network.

C6: Enhancing Oxford's unique heritage and creating quality new development

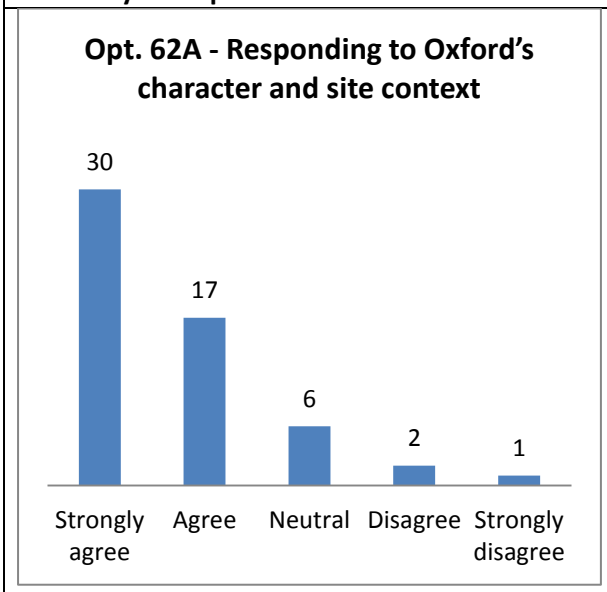
Opt. 61: Creating successful places

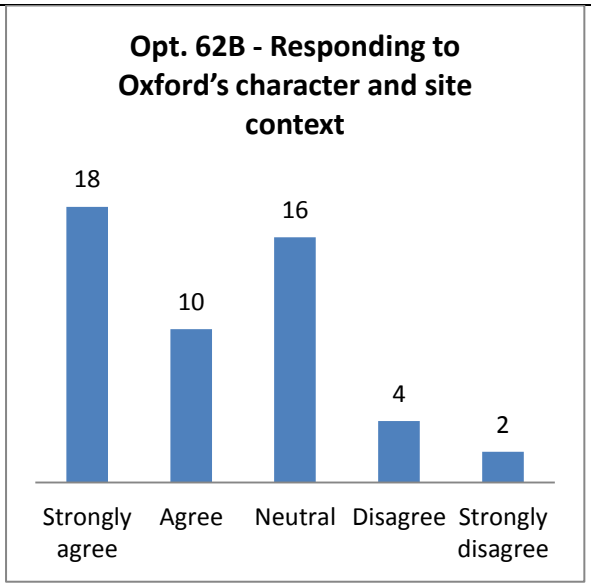
Summary of responses

Additional Comments
Bulk of written comments emphasised the need for good design that takes into account the importance of 'place'. Large portion of comments supported the preferred option. Most other comments articulated criticisms of the current quality of developments, design, and place-making in Oxford and asked for better, higher standards. A few comments opposed making standards obligatory for developers, but rather supported allowing them further freedom as long as they followed national planning guidelines.

How these comments were taken into account in the proposed submission draft
Policy DH1 is intended to achieve high quality design and placemaking across Oxford. It applies to all developments other than changes of use without external alterations and householder applications. A series of checklist points set out in an Appendix are expected to be covered by information accompanying the application, where relevant.

Opt. 62: Responding to Oxford's character and site context

Summary of responses





Additional responses

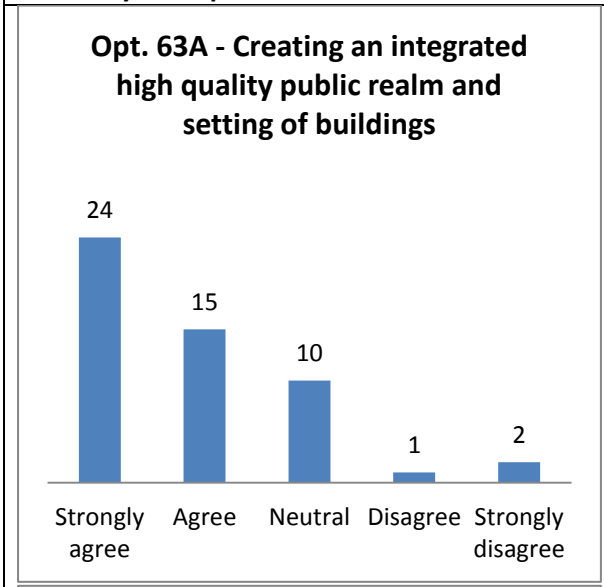
The bulk of the additional comments emphasised the importance of high quality design that really does respond to Oxford's character and context. Most comments lamented current and/or recent developments throughout Oxford and argued that the city is suffering as a result of developments that do not appropriately respond to Oxford's character and context. Some comments supported the idea of an Oxford Character Assessment Toolkit, whilst others were sceptical of both preferred options in the absence of further details relating to the Toolkit and/or the design criteria.

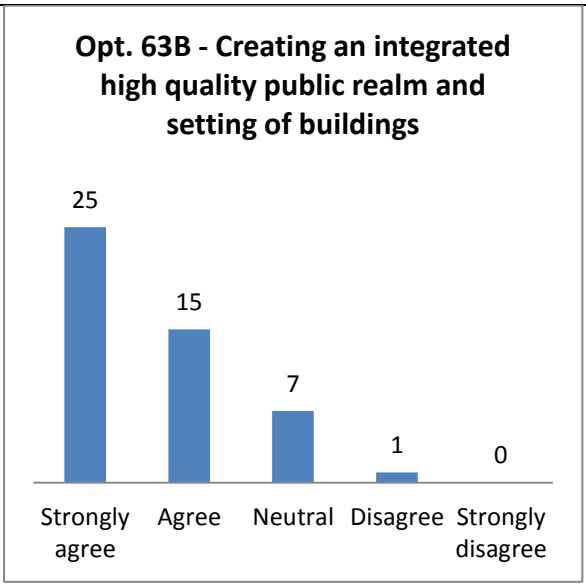
How these comments were taken into account in the proposed submission draft

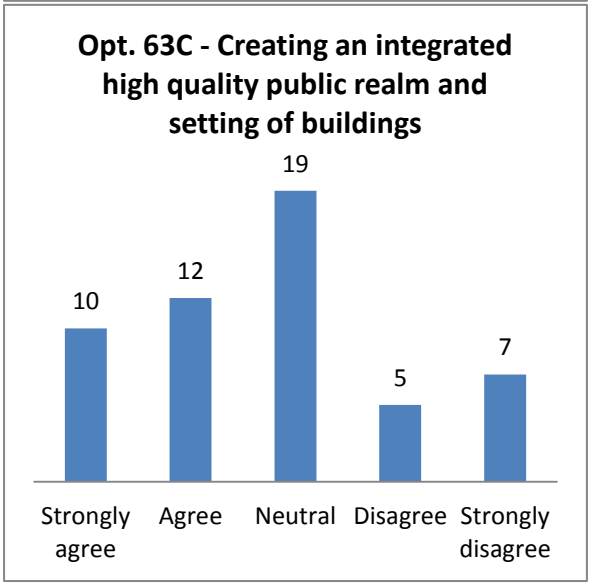
The checklist relating to Policy DH1 includes three points relating to 'responding to site character and context'. This requires applicants to show how they have understood and responded to the features, opportunities and constraints of the site and its setting. This may include heritage asset and landscape features as well as potential barriers like noise or railway lines. Policy DH1 and the related appendix are intended to ensure that design responds to surrounding character and context, and that this is set out clearly in applications.

Opt. 63: Creating an integrated high quality public realm and setting of buildings

Summary of responses





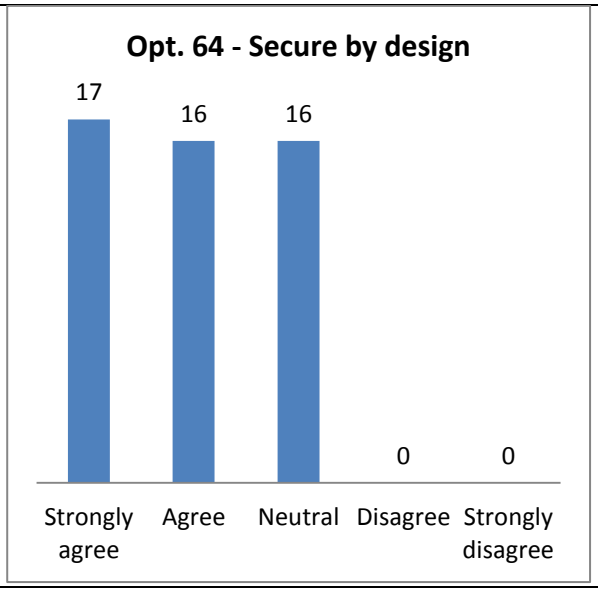


Additional Comments

The bulk of the additional comments made it clear that they support an engaging public realm that can be experienced by pedestrians. Numerous comments related to concern about the current focus of design on cars, and asked for design of public realm and new development that serves the pedestrian, and minimises both car use and car presence. Cycle parking and bin storage were also mentioned as points that require improvement. Preferred option C and its focus on public art was a common source of comment that prompted several comments articulating the requirement for higher quality public art that serves a purpose or is more stimulating, whilst several others argued that art is subjective and generally of low-quality and as such, public money should not be spent on installing it.

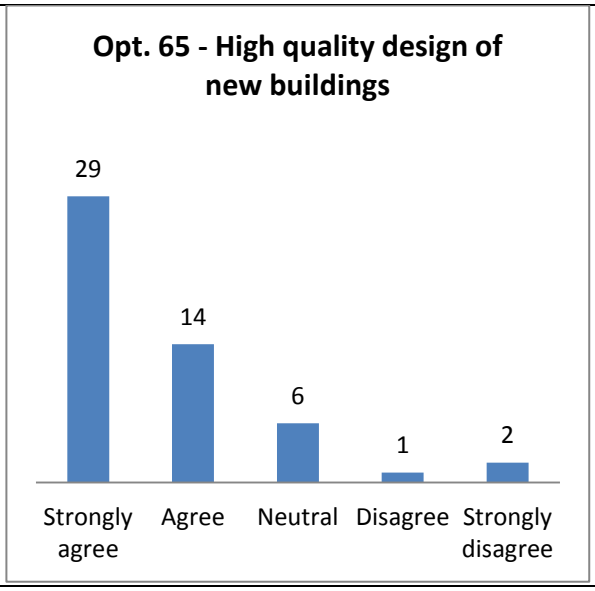
How these comments were taken into account in the proposed submission draft
The City Centre Movement and Public Realm Study aims to change movement patterns in the city centre with the aim of achieving an improved public realm. Policy DH7 aims to ensure cycle parking and storage are adequate and well designed. The appendix relating to DH1 aims to ensure that public art makes a positive contribution to a new development.

Opt. 64: Secure by design

Summary of responses

Additional Comments
Comments returned on this preferred option were nearly all in support. One commenter noted that Oxford City Council ought to strengthen the scheme even further.

How these comments were taken into account in the proposed submission draft
There is no policy in the proposed submission draft that specifically relates to Secure by Design principles, however aspects of the principles have been integrated across a number of policies including DH1 (High quality design and placemaking), DH6 (shopfronts and signage) and DH7 (external servicing features and stores). Appendix 6.1, relating to Policy DH1 sets out expectations in terms of design features and treatment of external areas that will be considered acceptable.

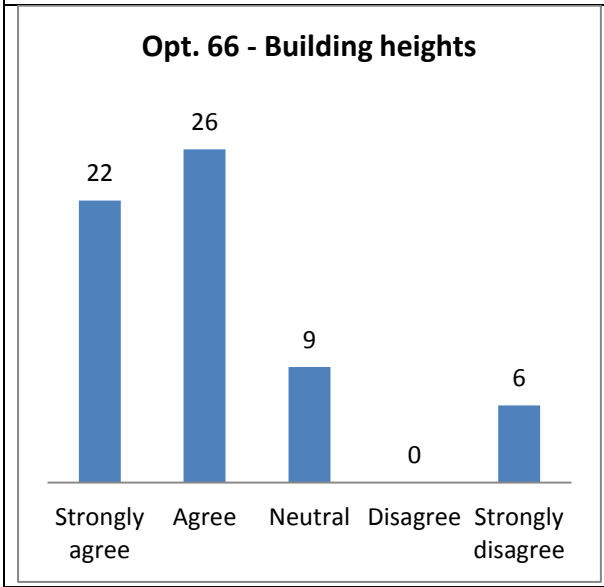
Opt. 65: High quality design of new buildings

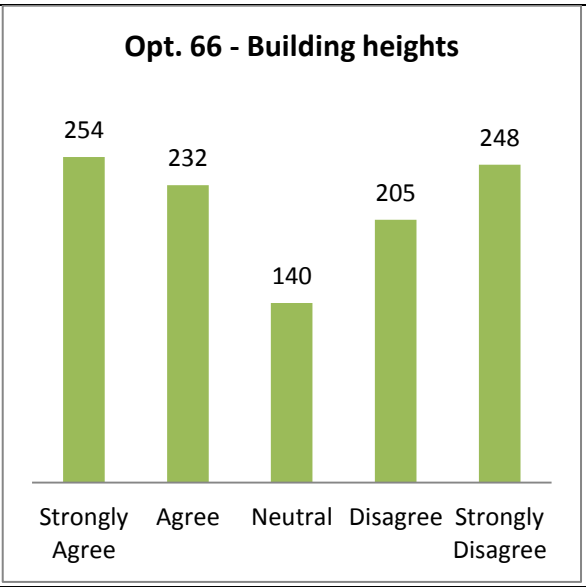
Summary of responses

Additional Comments
The majority of comments were made in support of the preferred options. Generally, comments that fed back supported high quality design for new buildings, but many enquired about how terms like 'high', 'poor', 'standard', etc. would be defined and determined. Many expressed a desire that 'high quality' would include strict environmental requirements and considerations. A few comments argued that 'high quality design' is more important than 'distinctive design'. Several comments were opposed – either in principle, or by citing past developments – to the council giving design guidance on any developments.

How these comments were taken into account in the proposed submission draft
Policy DH1 is intended to achieve high quality design and placemaking across Oxford. It applies to all developments other than changes of use without external alterations and householder applications. A series of checklist points set out in an Appendix are expected to be covered by information accompanying the application, where relevant. High quality design will have a number of characteristics. The checklist points set out how it is expected that design should respond to character and context and natural features and setting out guidance for designing development blocks, external areas and buildings and for ensuring quality.

Opt. 66: Building heights

Summary of responses





Additional Comments

This option received a substantial amount of feedback. Many comments were in support of the preferred option; many comments were in opposition. The bulk of the numerous comments in support sought to have the higher building heights focused along arterial roads and in district centres. The bulk of the comments in opposition were opposed in-principle to any kind of increase in building heights. Numerous people expressed concern over the impact on views, and the skyline. Numerous others stated that higher buildings were not representative of Oxford's character. Many comments were content with increases in height as long as they were done with due consideration to all possible impacts and were not allowed to spread rampantly and without control to impact on sensitive locations. Finally, some others argued that strict height limits should be maintained, and some others argued that no height restrictions should be in place at all.

How these comments were taken into account in the proposed submission draft

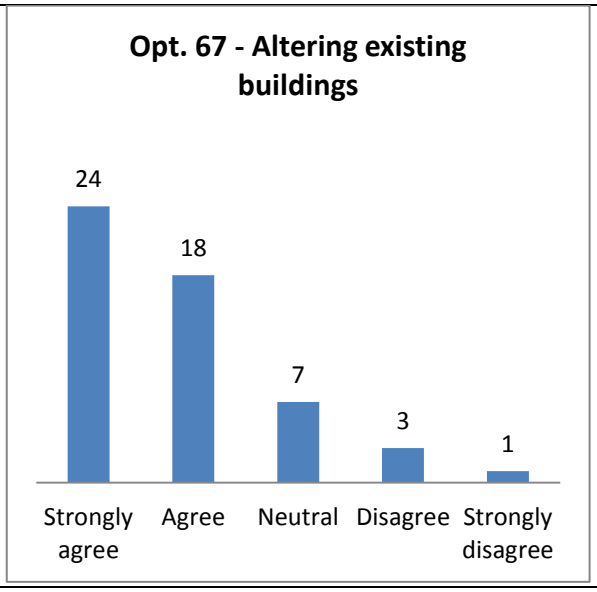
The preferred option has been integrated into policy DH2, which addresses building heights and views. The emphasis of the policy is on siting tall buildings in suitable locations, with clear justifications for choices regarding height and bulk, as well as a requirement to demonstrate that the proposals have a positive impact on their setting. The commissioned High Buildings Study has mapped the areas most sensitive to increased heights and formed the basis of a Technical Advice note that will provide guidance in the development of proposals.

Tall buildings can be useful in some circumstances, for example in increasing density, and as such a blanket prohibition on increased building heights could be counterproductive and potentially limit needed development. Placing an emphasis on maximum heights can have the unintended consequence of all buildings being built to the allowed limit resulting in a bland roofscape and degradation of Oxford's unique skyline.

Strict criteria have been set for buildings within the historic core area (1.2 km radius of Carfax tower), to ensure the highest possible design quality and minimal intrusion on the historic skyline and the unique appearance of the city centre .

Opt. 67: Altering existing buildings

Summary of responses



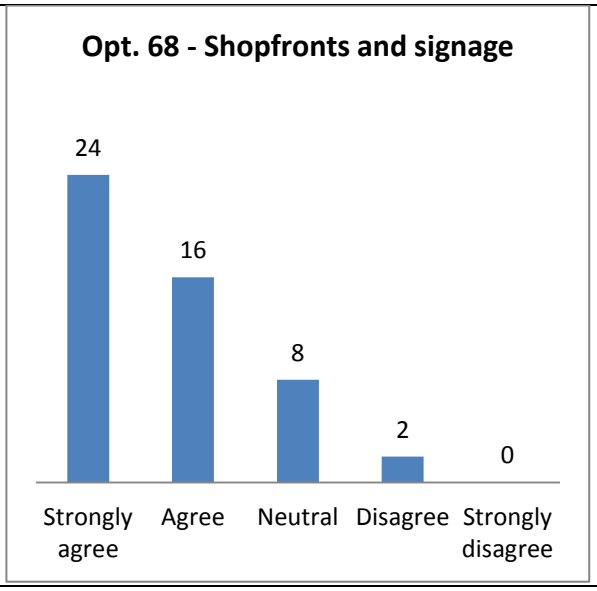
Additional Comments

Most comments received were in favour of the preferred option. Several comments noted the importance of flexibility within the planning system to allow for alterations that relate to energy efficiency and environmental standards improvements – including those such as external wall insulation. A few comments noted that extremely different and distinct extensions to buildings can often be of high quality and worth encouraging, and also that new and different designs ought to be permitted where the existing architecture is considered to be of low quality. Several comments supported the preferred option specifically for conservation areas.

How these comments were taken into account in the proposed submission draft

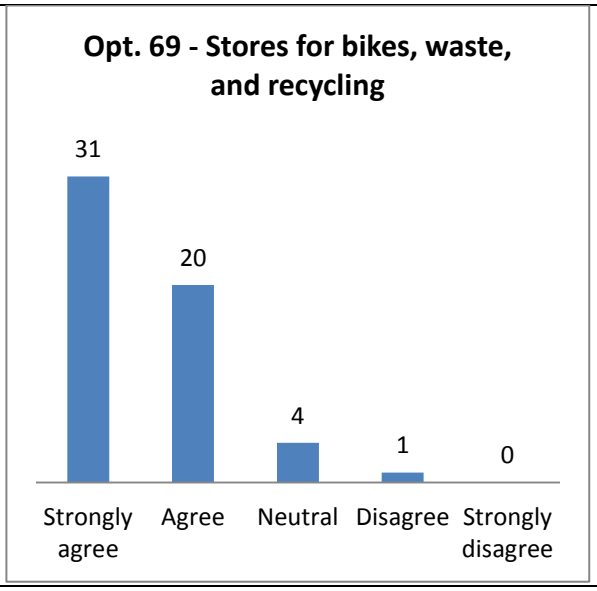
Policy DH1 is intended to achieve high quality design and placemaking across Oxford. It applies to all developments other than changes of use without external alterations and householder applications. A series of checklist points set out in an Appendix are expected to be covered by information accompanying the application, where relevant. The checklist points set out how it is expected that design should respond to character and context and natural features and setting out guidance for designing development blocks, external areas and buildings and for ensuring quality.

Opt. 68: Shopfronts and signage

Summary of responses

Additional Comments
The preferred option is supported by most of the comments received. A few comments asked that traditional shopfront styles and traditional materials be protected and not replaced with less context-sympathetic materials. A few comments noted the importance that strict signage regulations can have in improving aesthetic appearances.

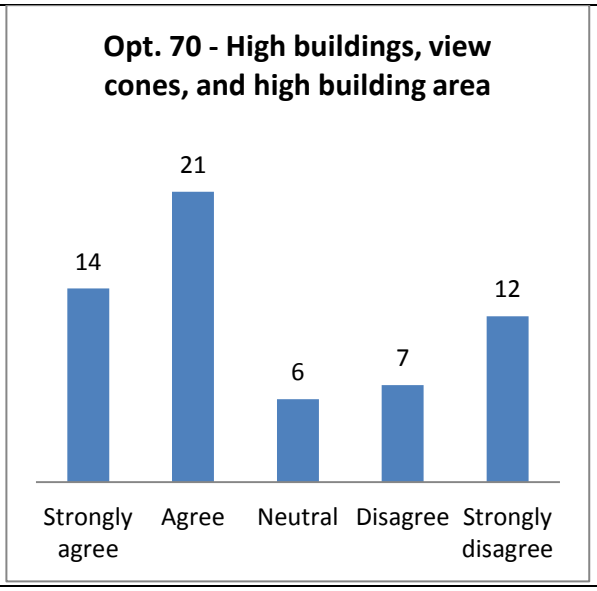
How these comments were taken into account in the proposed submission draft
The general support is welcomed and the additional comments noted. The preferred option has been integrated into policy DH6 in the proposed submission draft, which sets out specific criteria that new shopfronts and signage will be assessed against.

Opt. 69: Stores for bikes, waste, and recycling

Summary of responses

Additional Comments
The preferred option was met with unanimous support from comments received. The importance of adequate, appropriate, and well-designed storage specifically at terrace houses and HMOs and with flexibility for other needs like cargo bikes and buggies was emphasised by several comments.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The preferred option is represented in policy DH7, which sets out requirements for the design, accessibility and materials for bike/bin stores and other external servicing features. The policy emphasises the need for such areas to be considered from the start of the design process and not just included as an afterthought.

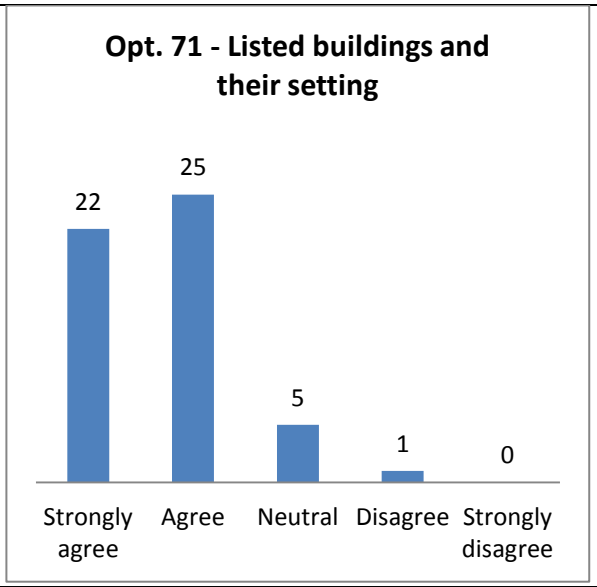
Opt. 70: High buildings, view cones, and high building area

Summary of responses


Additional Comments
11 additional comments were made in support of the preferred option. Several additional comments were made in general agreement with a more flexible approach but consider taller buildings should be only in particular areas, for example district centres or where they could block traffic noise, and as long as they are in keeping and not flat. Others did not agree with the approach and were concerned the policy would be a slippery slope or not provide a strong enough control.

How these comments were taken into account in the proposed submission draft
The preferred option has been integrated into policy DH2, which addresses building heights and views. The emphasis of the policy is on siting tall buildings in suitable locations, with clear justifications for choices regarding height and bulk, as well as a requirement to demonstrate that the proposals have a positive impact on their setting. The commissioned high Buildings Study has mapped the areas most sensitive to increased heights and formed the basis of a Technical Advice note that will provide guidance in the development of proposals. Strict criteria have been set for buildings within the historic core area (1.2 km radius of Carfax tower) and designated View Cones, to ensure the highest possible design quality and minimal intrusion on the historic skyline and the unique appearance of the city centre. Approvals will not be granted to any scheme within a designated View cone or in their proximity that detracts from the special significance of the view.

Opt. 71: Listed buildings and their setting

Summary of responses


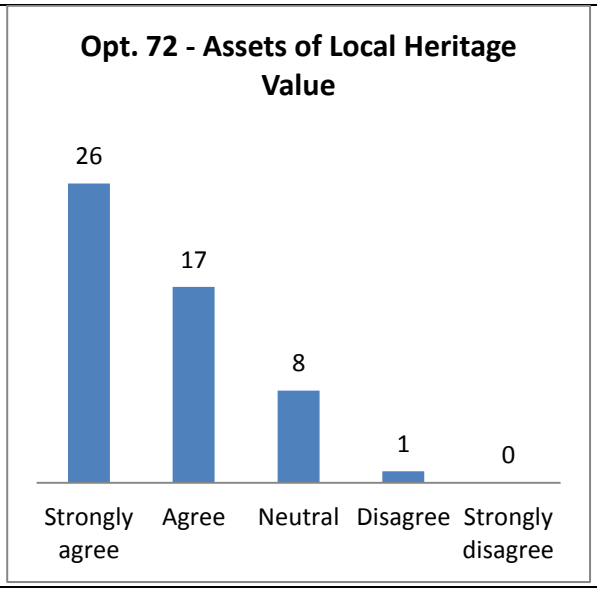
Additional Comments
Nine respondents commented in support of this preferred option. One respondent supported the preferred option, but considered that it needed to be stronger. Two respondents disagreed with the preferred option as they considered it to be too subjective as it is difficult to define 'harm' and they felt it needed to be clearer to ensure it will be effectively enforced.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed.

The preferred option is integrated within policy DH3 which addresses designated heritage assets. The policy covers the impacts of development on all heritage assets, including listed buildings, conservation areas and assets of local heritage value. The policy requires that developments must demonstrate that there is no unacceptable harm to a heritage asset, and sets out the strict criteria that would allow for limited exceptions when such harm would be justified.

Opt. 72: Assets of Local Heritage Value

Summary of responses



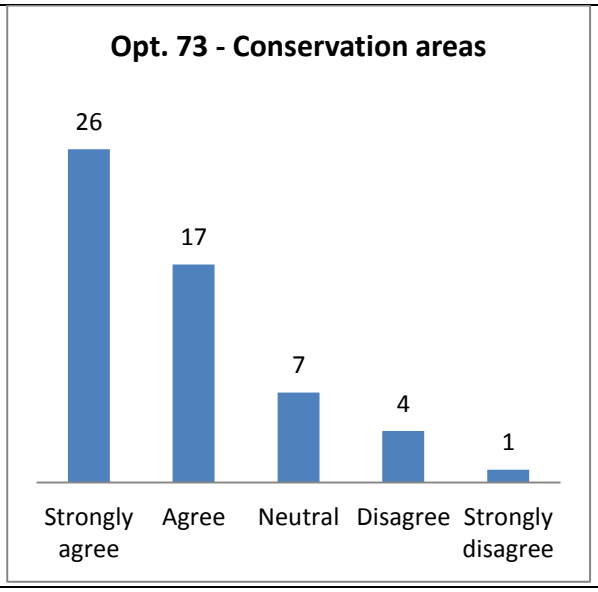
Additional Comments

Six respondents made additional comments in support of the preferred option. Two respondents believed the preferred option not to be necessary, as it is already dealt with by the NPPF. They considered that the NPPF guidelines should be relied on rather than a bespoke policy.

How these comments were taken into account in the proposed submission draft

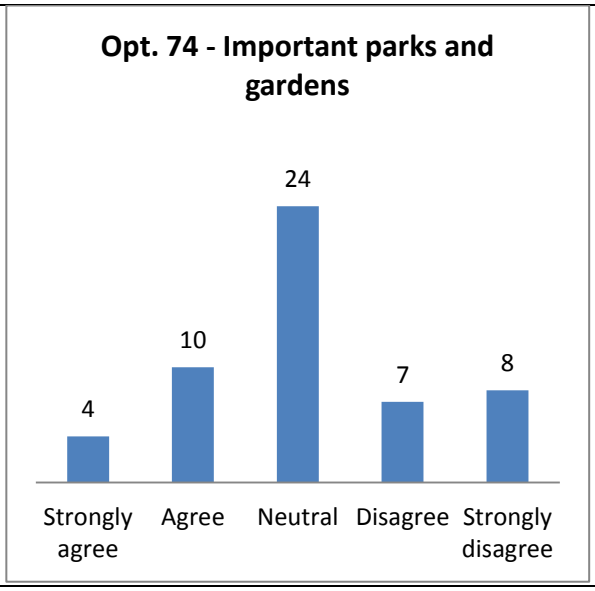
Policy DH5 considers local heritage assets. It is compliant with the NPPF. Consideration has been given to avoiding unnecessary repetition of the NPPF. However, there are some Oxford-specific aspects that are set out in the policy and supporting text. Also, it was considered important to include a policy in the Plan about local heritage assets in Oxford to ensure that they are not overlooked.

Opt. 73: Conservation Areas

Summary of responses

Additional Comments
Four respondents made additional comments in support of the preferred option. A couple of comments said the preferred option was weak and vague/lacked clarity, and should be amended to make reference to NPPF and Section 69 of the Planning (Listed Building and Conservation Areas) Act 1990. One respondent disagreed with the preferred options, and considered that no development should take place in conservation areas. One respondent considered the use of a general policy not appropriate as it would lead to a weakening of the Conservation Area protections. One respondent supported Rejected Option B, as they stated each conservation area is individual and needs to be evaluated as such.

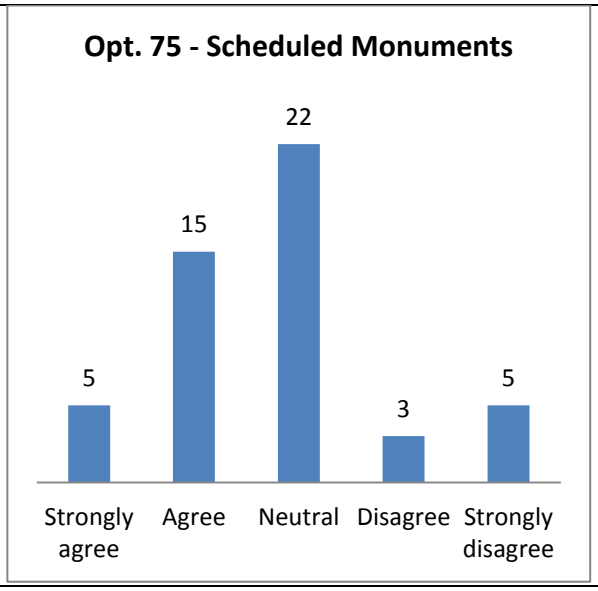
How these comments were taken into account in the proposed submission draft
Policy DH3 relates to designated heritage assets, including conservation areas. This refers to conservation area appraisals. The conservation area appraisals add detailed information in support of the policy. It is considered that inclusion of a policy relating to conservation areas, with conservation areas shown on the policies map, is necessary. The policy aims to ensure the significance of the conservation area is understood and responded to appropriately.

Opt. 74: Important parks and gardens

Summary of responses

Additional Comments
There was little response received in relation to Option 74. Two respondents made additional comments in support of the preferred option. One respondent questioned which 'other policies' Preferred Option A referred to. Nine respondents supported Rejected Option B. One respondent supported Option B as they considered open spaces to be particularly vulnerable to development and required a policy to regulate this. One respondent supported Option B as they stated national policies should not be relied on as they are not under Oxford's control and thus could be weakened.

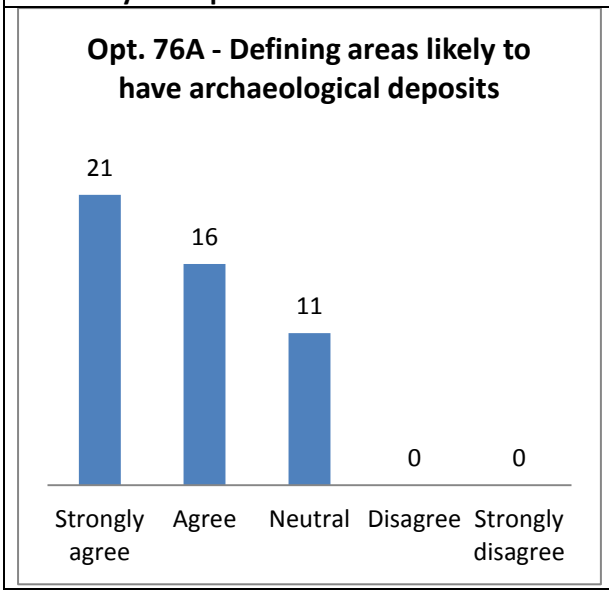
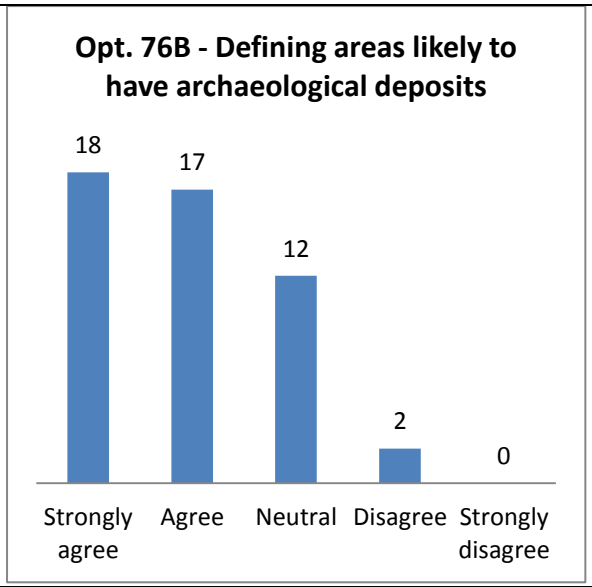
How these comments were taken into account in the proposed submission draft
The preferred option was reconsidered following the comments received. Policy DH3 on designated heritage assets refers to all designated heritage assets, which includes registered parks and gardens.

Opt. 75: Scheduled Monuments

Summary of responses

Additional Comments
There was little response received in relation to Option 75. Two respondents made additional comments in support of the preferred option. One respondent questioned which 'other policies' Preferred Option A referred to. Two respondents supported Rejected Option B, with concern that national policies cannot be controlled and have the potential to be weakened in future.

How these comments were taken into account in the proposed submission draft
The preferred option was reconsidered following the comments received. Policy DH3 on designated heritage assets refers to all designated heritage assets, which includes scheduled monuments.

Opt. 76: Defining areas likely to have archaeological deposits

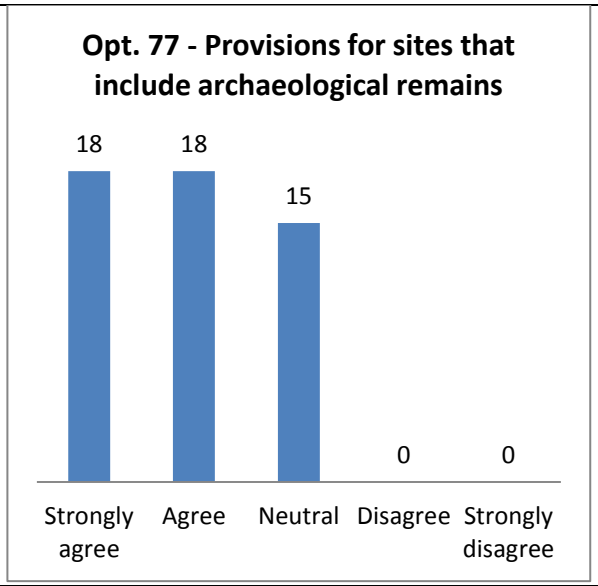
Summary of responses	
	

Additional Comments
There was little response received in relation to Option 76. Three respondents made additional comments in support of the preferred option, which was a combination of both Preferred Option A and B. Three respondents supported Alternative Option C, as they considered there to be a need to define other areas that are likely to contain archaeological deposits.

How these comments were taken into account in the proposed submission draft
Policy DH4 integrates aspects of all three options presented during the consultation. The City Centre Archaeological Area is defined on the Proposals Map, and while there are no other areas designated in that way, allocated sites where archaeological remains have been identified or anywhere that they are suspected to exist, developers are required to carry out suitable assessments (described in the policy) and set out measures to mitigate any harm.

Opt. 77: Provisions for sites that included archaeological remains

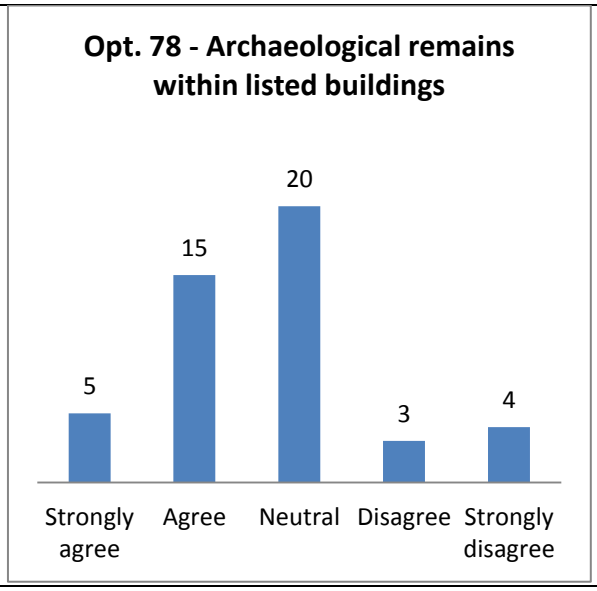
Summary of responses



Additional Comments
There was little response received in relation to Option 77. Three respondents made additional comments in support of the preferred option. One respondent understood the desire to consider cumulative impacts, but believed it should be made clear in the draft policy whether this option intends to move away from NPPF guidance. One respondent agreed with the preferred policy, but did not believe it should be limited to central Oxford. One respondent supported Alternative Option B.

How these comments were taken into account in the proposed submission draft
The support is welcomed and additional comments noted. DH4 addresses the impact of development on archaeological remains and how negative effects can be mitigated.

Opt. 78: Archaeological remains within listed buildings

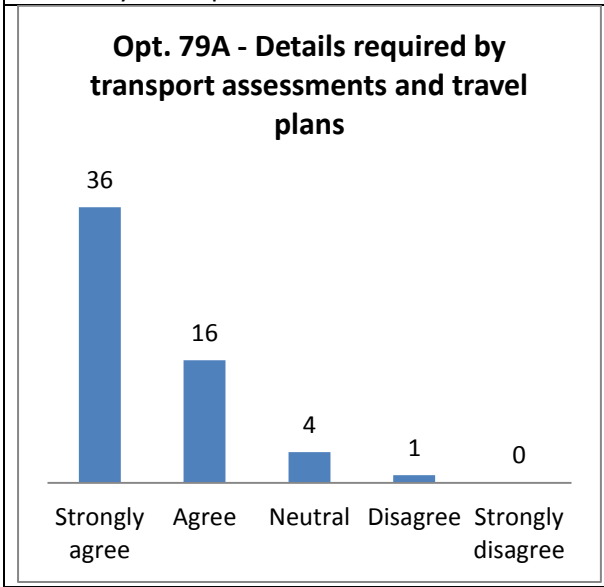
Summary of responses

Additional Comments
There was little response received in relation to Option 78. Two respondents made additional comments in support of the preferred option. One respondent supported Alternative Option B, as they believed that there should be a policy that reinforces national planning policy and other regulatory regimes. Three further respondents supported Alternative Option B.

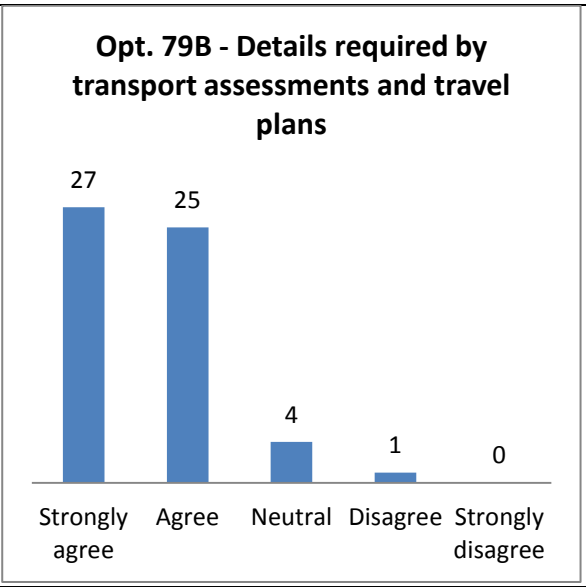
How these comments were taken into account in the proposed submission draft
No specific policy has been produced based on this option, however the issues raised are addressed Policies DH3 and DH4, and the application of the two is expected to be adequate for this situation. DH3 addresses development that affects heritage assets, including listed buildings, and sets out the criteria against which the impact of any works will be assessed. DH4 addresses the impact of development on archaeological remains and how negative effects can be mitigated.

C7: Ensuring efficient movement into and around the city

Opt. 79: Transport Assessments and Travel Plans (including servicing and delivery plans)

Summary of Responses





Additional Comments

There was support for this PO however it was felt some amendments needed to be made to cover issues set out in LTP4. In addition the County Council felt there needed to be more up to date TA guidance introduced to ensure that the impacts of parking and appropriate planning for cycling and walking are adequately considered.

How these comments were taken into account in the proposed submission draft

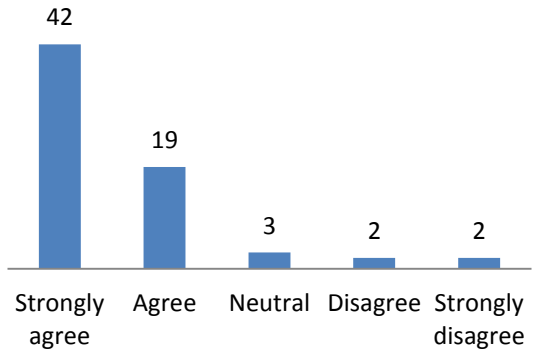
The overall positive support for the proposed approach is noted and welcomed.

Policy M2 and its supporting text address assessing and managing development. The thresholds for Transport Assessments are set out in Appendix 7.1 and include reference to guidance produced by Oxfordshire County Council. Parking, cycling and walking are considered within this guidance. Appendix 7.2 sets out requirements for Travel Plans. Furthermore Policy M3 and Appendix 7.3 specifically address vehicular parking standards for residential and non- residential developments.

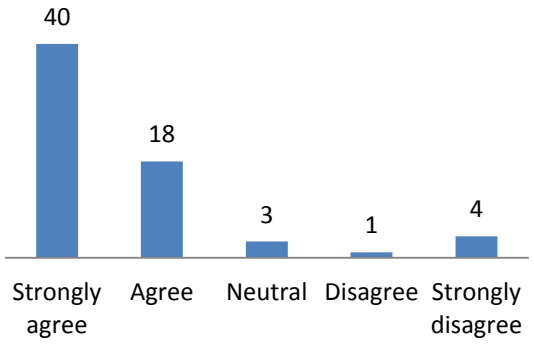
Opt. 80: Supporting city-wide pedestrian and cycle movement

Summary of Responses

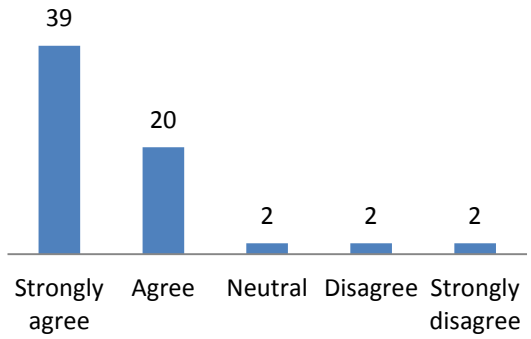
Opt. 80A - Identify & require key links in the pedestrian and cycle network for completion or improvement



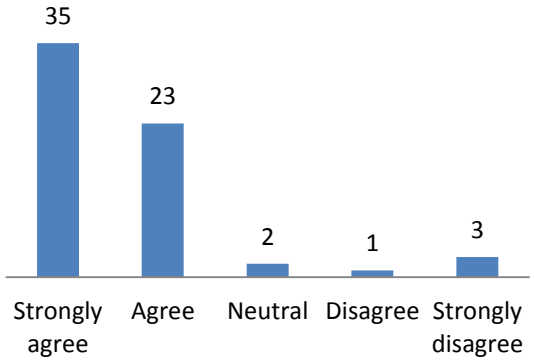
Opt. 80B - Require developers to demonstrate how proposals connect to pedestrian and cycle network



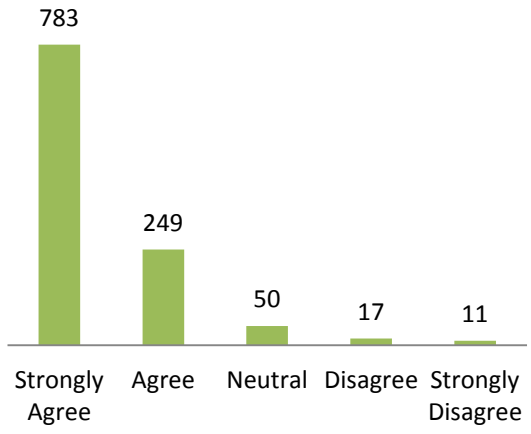
Opt. 80C - Require developers to demonstrate how their street design ensures a good walking environment



Opt. 80D - Require developers to demonstrate how their street design ensures a good cycling environment



Opt. 80 - Supporting city-wide pedestrian and cycle movement

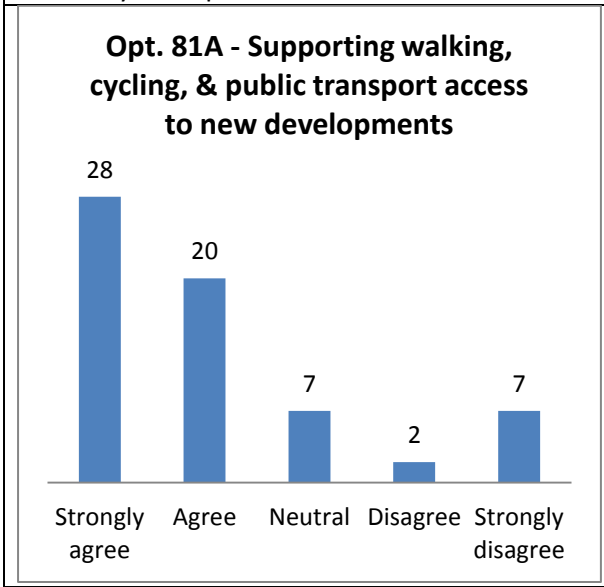


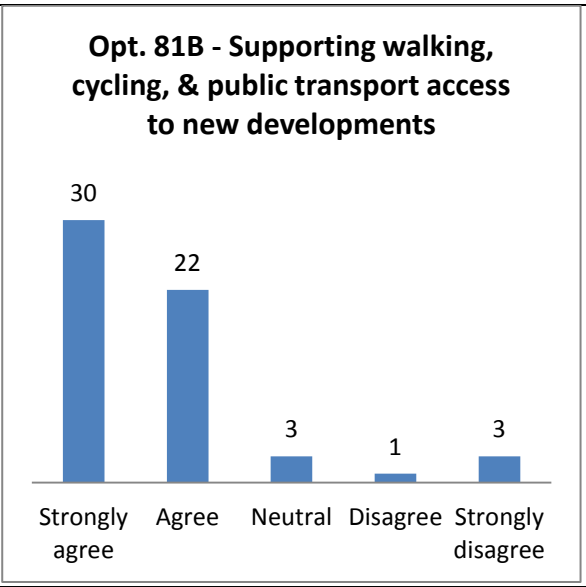
Additional Comments
There was considerable support received to increase the numbers of streets that are pedestrianised in the city, especially Broad Street, Queens Street and St Giles. These streets should not be shared with buses and taxis. There are some very dangerous junctions in the city particularly the Plain roundabout. Some comments acknowledged that cycling and walking are not attractive options in bad weather and during winter months and it is unrealistic to think that the huge demand for travel within and across Oxford can be accommodated by walking and cycling. The lack of certainty about routes particularly cycling routes does not help and the proposed bridge crossing at Aston Eyots would conflict with the nature reserve and result in management problems.

How these comments were taken into account in the proposed submission draft
The overall positive support for the proposed approach is noted and welcomed. The aim of the Local Plan Strategy is for Oxford to become a world class cycling city with improved air quality, reduced congestion and enhanced public realm. To achieve this ambition there is a need to prioritise road space and promote the use of walking, cycling and public transport. The prioritisation of walking, cycling and public transport is addressed within Policy M1 and its supporting text. In the City Centre, the City and County Councils jointly commissioned a transport and movement study to develop a strategy for the city centre's transport systems and its public realm. The final report 'Oxford City Centre Movement and Public Realm Strategy', published in July 2018 presents a strategy for better managing access and movement to and within the city centre and achieving a substantial improvement in the quality and usability of the public realm. Although the idea for a bridge crossing at Aston Eyots would be welcome there is no willing landowner to facilitate delivery.

Opt. 81: Supporting walking, cycling, and public transport access to new developments

Summary of responses





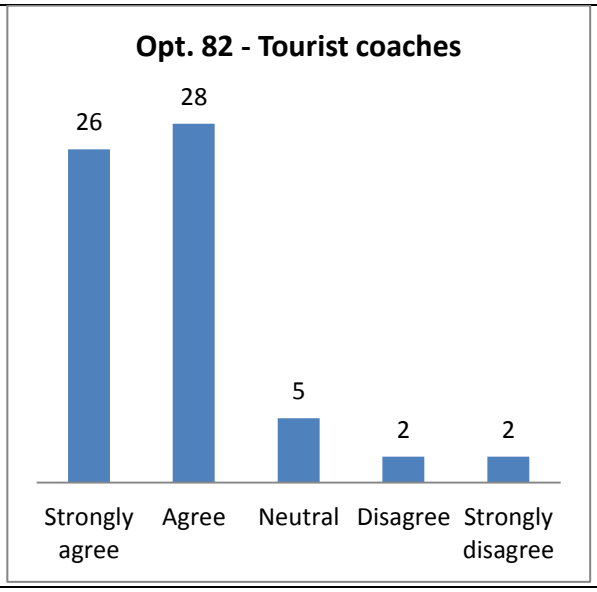
Additional Comments
Many of the comments were in support of the PO. However, many of the suggestions for change

related to the existing situation rather than considering future changes to the movement hierarchy. Some respondents were in favour of introducing a tram system and thus avoiding congestion caused by buses.

How these comments were taken into account in the proposed submission draft
The positive support for the proposed approach is noted and welcomed. The emerging local plan promotes sustainable travel in the forms of walking, cycling and public transport over private car use and Policy M1 and its supporting text address prioritising walking, cycling and public transport.

Opt. 82: Tourist coaches

Summary of responses

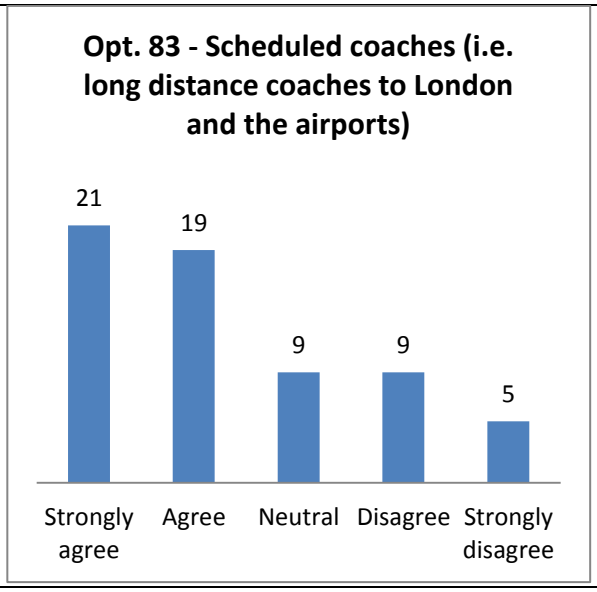


Additional Comments

There was support for this PO by most respondents however added comments raised concerns about the lack of suitable locations other than park and ride sites for pick up and drop down. Although others raised concern that this would result in too much pressure on the existing park and ride facilities. The possibility of using Oxpens was offered as a pick-up/put-down location. Concern was expressed that the lack of clarity could make the situation worse owing to the high level of tourists entering the city.

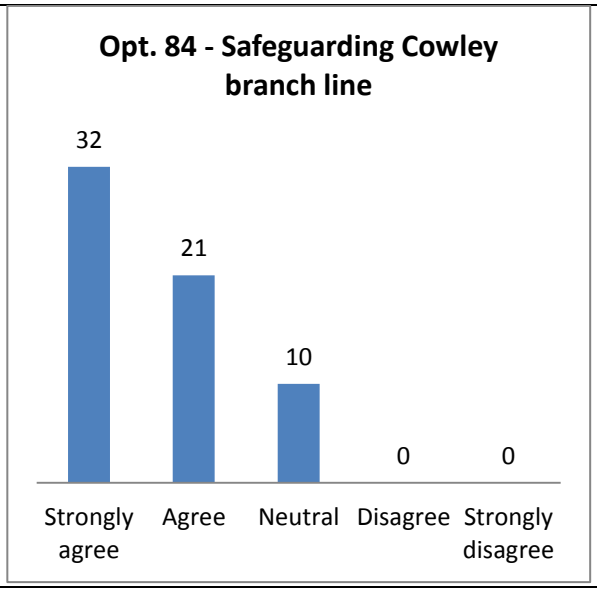
How these comments were taken into account in the proposed submission draft
The support and additional comments on the proposed approach are noted. The quantity of tourist coaches entering the city prevents a challenge particularly during the summer months. The proposed strategy is for coach parking facilities to be provided at Redbridge Park and Ride site and for drop off and pick up only points to be provided within the city. Within the city the drop off and pick up points will be St Giles and St Aldates only. The 'Oxford City Centre Movement and Public Realm Strategy', published in July 2018 by Phil Jones Associates considers tourist coaches and offers suggestions for further work to help mitigate their impact.

Opt. 83: Scheduled coaches

Summary of responses

Additional Comments
The comments received although supportive of the PO raised concerns that changes to routes and procedures could inconvenience users significantly. A clear evidence base must be available prior to change. On the other hand some respondents considered the damage that the coaches were doing to the city centre was so significant that they should terminate at the park and rides and a smaller shuttle service should bring people into the city centre.

How these comments were taken into account in the proposed submission draft
The support and additional comments on the proposed approach are noted. Coach travel is important as a sustainable mode of travel to Oxford and there are several long distance coach routes from the city which provide an alternate to car travel. The City Council will continue to support the County Council to achieve the optimum routes for these services within the city centre to reduce the negative impact of these coaches on both public realm and air quality. The 'Oxford City Centre Movement and Public Realm Strategy', published in July 2018 by Phil Jones Associates considers scheduled coach services and offers suggestions for further work which include exploration of alternate locations for a coach terminus in the city centre.

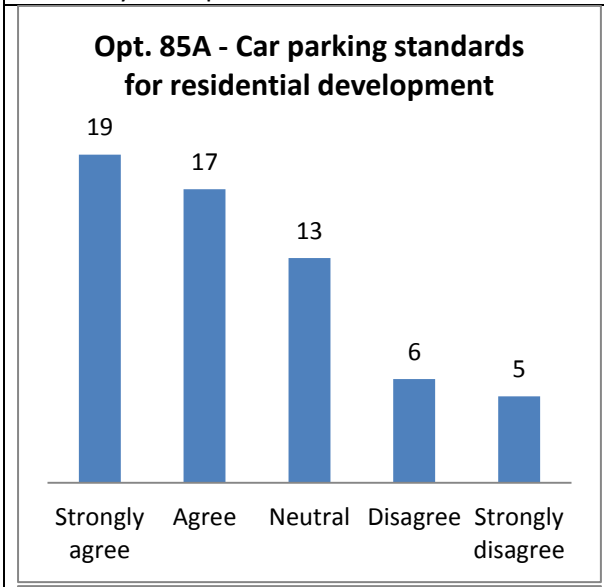
Opt. 84: Safeguarding Cowley Branch Line

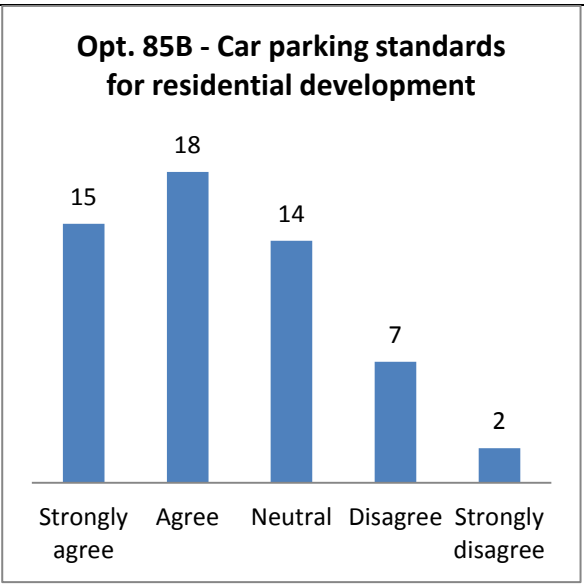
Summary of responses

Additional Comments
This PO was supported by all respondents; additional comments received requesting that the opportunities to expand the network further should be taken such as extending track to Thame and providing a link to Witney. The proposal to open the line to passengers however must not compromise the use of the line for freight.

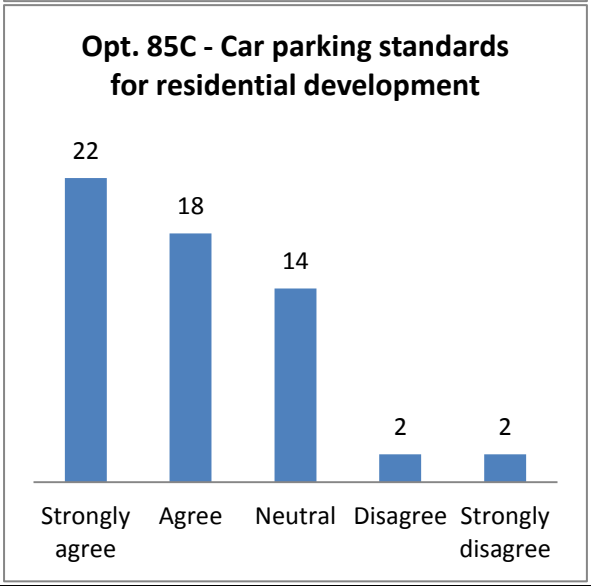
How these comments were taken into account in the proposed submission draft
The overall positive support for the proposed approach is noted and welcomed. The City Council supports the proposal to reopen the Cowley Branch Line and the preferred option is represented in the proposed submission draft by policy M1 and its supporting text.

Opt. 85: Car parking standards – residential

Summary of responses







Additional Comments

The majority of comments were supportive of car free and lower car parking standards. However, some comments have argued that car free development in Headington has not worked. Other comments raised general concerns about the impact of parking across the city.

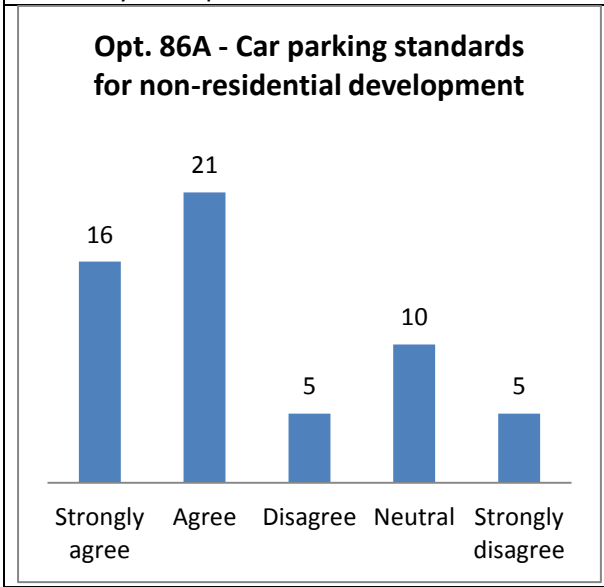
How these comments were taken into account in the proposed submission draft

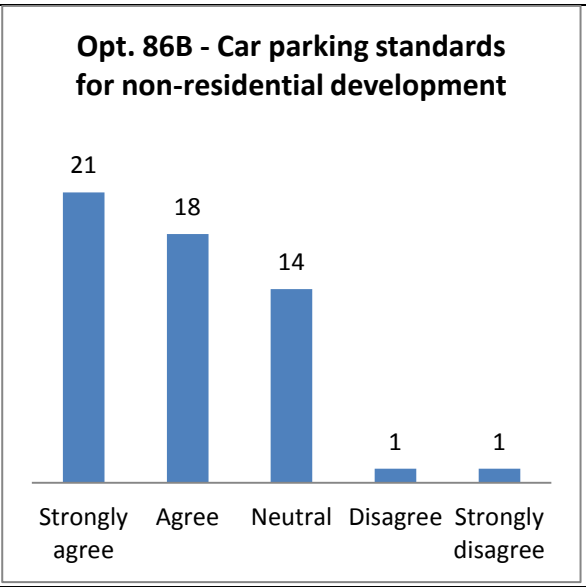
The positive support for the proposed approach is noted and welcomed.

The emerging local plan seeks to encourage car free and reduced car parking in residential developments across the city and recognises that opportunities for successful car free housing are high in Oxford because of the existing Controlled Parking Zones, the availability of walking and cycling routes and facilities and the excellent public transport options. Policy M3 and its supporting text address motor vehicle parking and Appendix 7.3 sets out Vehicular Parking Standards.

Opt. 86: Car parking standards – non-residential

Summary of responses





Additional Comments

The majority of comments were supportive of reduction of parking available in the city centre. Employment sites should only be provided with essential parking. Car parks should provide electric charging points. A number of comments received supported multi-storey or underground parking. Other suggested that car parking charges should be increased in the city centre to deter people parking in the centre. There should be no more car parks at the John Radcliffe sites. All existing car parks should be for hospital staff and there should be dedicated park and ride for patients and visitors.

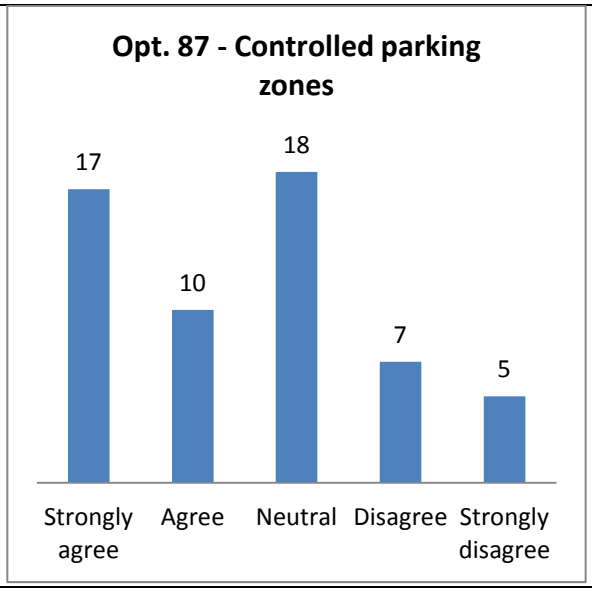
How these comments were taken into account in the proposed submission draft

The general support for the proposed approach is welcomed.

The emerging plan seeks to encourage a reduction in parking levels in non- residential developments across the city. For new developments for B1 use within the city centre and districts centres only parking for operational need will be permitted.

Policy M3 and its supporting text address Motor vehicle parking and vehicular parking standards for non-residential development are set out in Appendix 7.3.

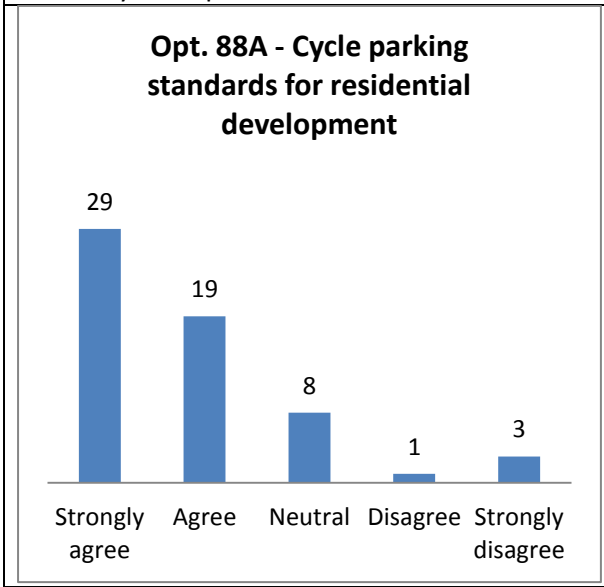
Opt. 87: Controlled parking zones (CPZ)

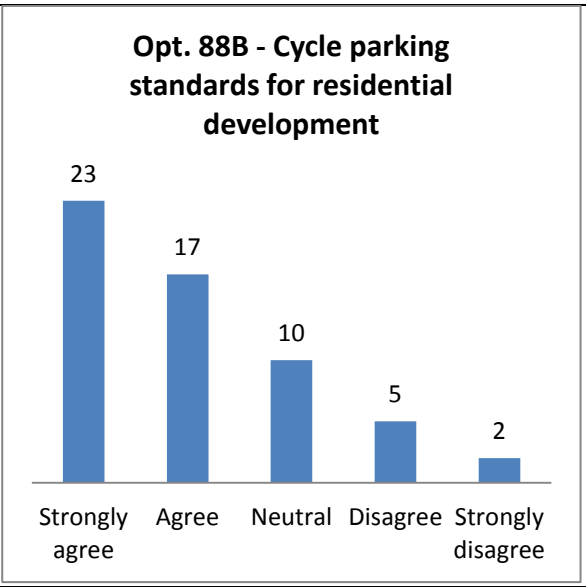
Summary of responses

Additional Comments
The responses acknowledged that it is not within the role of the Local Plan to introduce CPZs. However, all respondents recognised that there was a need to control parking. Some residents raised the concern that the introduction of CPZ can result in overspill into other neighbourhoods.

How these comments were taken into account in the proposed submission draft
Comments and concerns have been noted. The emerging plan identifies that the City and County Council are working towards covering the whole city with Controlled Parking Zone by 2036, if not earlier. Policy M3 and its supporting text address motor vehicle parking in Controlled Parking Zones and Appendix 7.3 includes a residential parking decision flow diagram as well as vehicular parking standards.

Opt. 88: Cycle parking standards – residential

Summary of responses





Additional Comments

All the comments received recognised the need to improve active travel and by providing adequate cycling facilities this will help promote and encourage cycling. Parking standards should be reviewed to reflect the current levels of cycling and to consider future levels of provision required too.

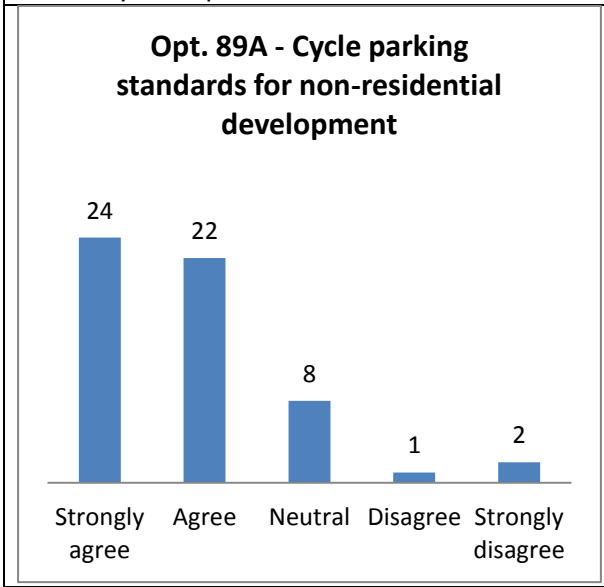
How these comments were taken into account in the proposed submission draft

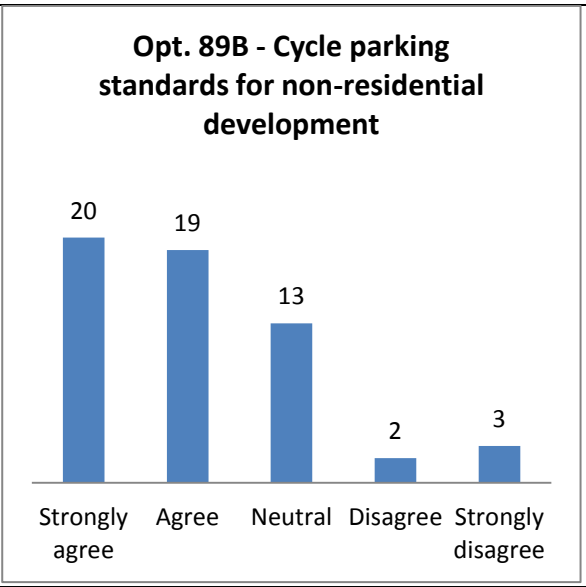
The support is welcomed and noted.

Policy M5 addresses cycle parking provision and has been written to reflect current high levels of cycling, and in anticipation of this continuing/ increasing. Appendix 7.3 sets out minimum cycle parking standards for residential development. These standards are informed by recent research evidence and include reference to infrastructure to support the charging of electric bikes.

Opt. 89: Cycle parking standards – non-residential

Summary of responses





Additional Comments

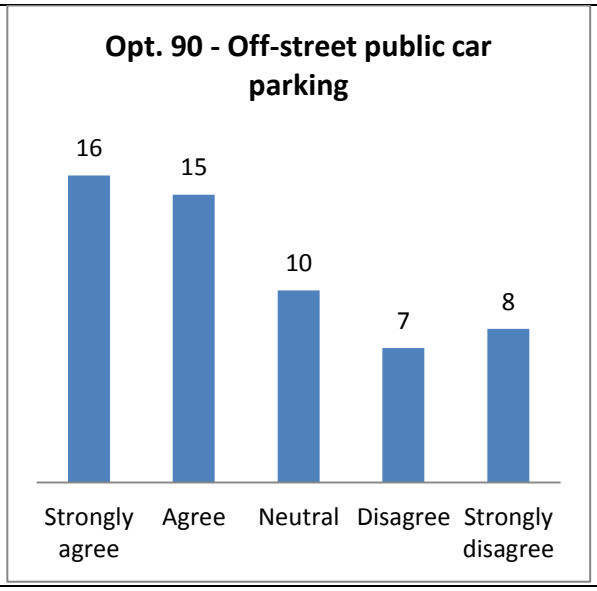
The comments submitted all supported the PO and wish to see improved quality of cycle parking to include covered parking and CCTV.

How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed.

Policy M5 addresses cycle parking provision and Appendix 7.3 sets out minimum cycle parking standards for non-residential development. Appendix 7.4 sets out the thresholds and minimum standards for the provision of showers and changing facilities. These standards are informed by recent research evidence and include reference to infrastructure to support the charging of electric bikes.

Opt. 90: Off-street public car parking

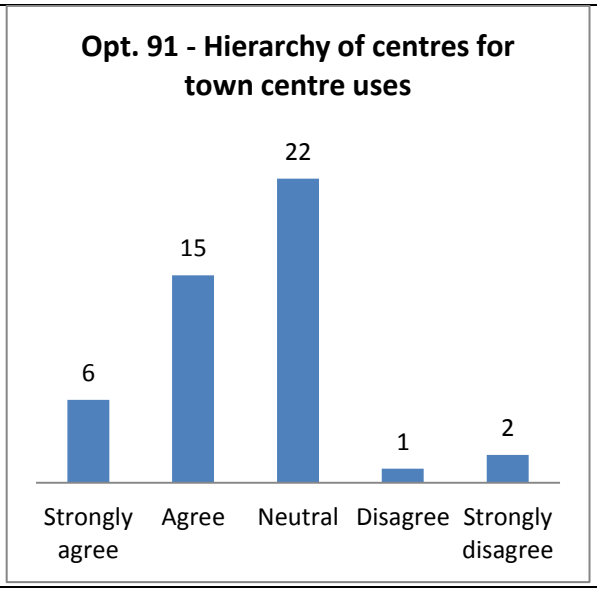
Summary of responses

Additional Comments
The majority of comments received supported the PO to not allow additional off-street public parking spaces in the city and district centres.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. Policy M3 and its supporting text address motor vehicle parking and Appendix 7.3 sets out Vehicular Parking Standards.

C8: Ensuring Oxford is a vibrant and enjoyable city to live in and visit and providing facilities and services

Opt. 91: Hierarchy of centres for town centre uses

Summary of responses to PO



Additional Comments

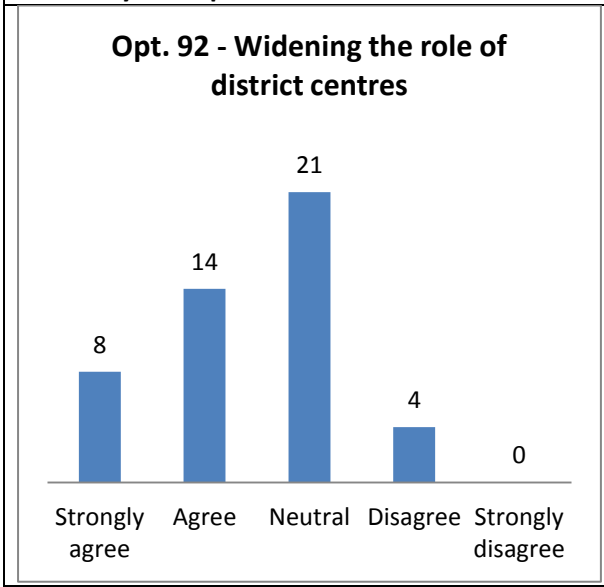
A significant portion of the comments received were in support of the preferred option. The popular sentiment of most comments received emphasised the importance of designating centres and ensuring a varied use. The most common form of comment was a query as to whether or not more low(er) level centres could be created; specifically suggesting places like Botley Road and Marston. A few comments expressed concern over the possible impacts and/or drain on other areas of the city if the focus was on the centre and district centres. A few comments preferred a less structured approach in which the market carried more influence and mixed-uses could/would be permitted throughout the city/outside of designated centres.

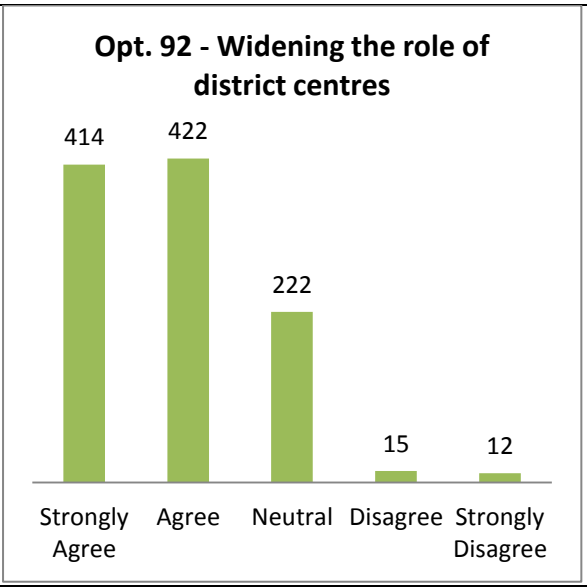
How these comments were taken into account in the proposed submission draft

Hierarchy of uses are often based on retail uses and mandatory thresholds of how much of the centres are given over to retail and related uses. Bearing in mind the uncertainties around the retail sector, particularly with changes in shopping habits and declines in the use of physical premises, the council has decided on a more flexible approach whereby there would be no minimum thresholds and due consideration will be given to any proposals subject to specified criteria. As such the proposed submission draft will not have a specific policy addressing a hierarchy of town centre uses.

Opt. 92: Widening the role of district centres

Summary of responses





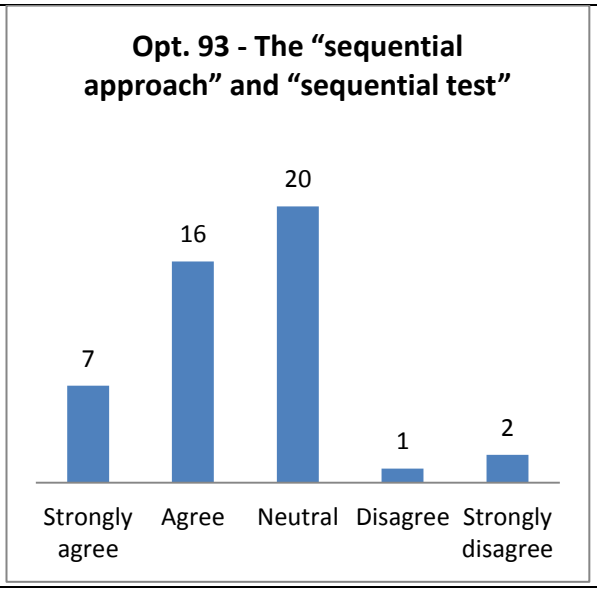
Additional Comments

Most comments supported the concept of designating district centres and using that designation as a means of shaping and/or protecting the uses and characteristics of that area. Numerous comments articulated individual concerns and preferences for the shape/character of different areas around the city. A few comments expressed concern about focusing more development on specific centres. A few comments queried the merits and/or need for this policy.

How these comments were taken into account in the proposed submission draft

Hierarchy of uses are often based on retail uses and mandatory thresholds of how much of the centres are given over to retail and related uses. Bearing in mind the uncertainties around the retail sector, particularly with changes in shopping habits and declines in the use of physical premises, the council has decided on a more flexible approach whereby there would be no minimum thresholds and due consideration will be given to any proposals subject to specified criteria. As such the proposed submission draft will not have a specific policy addressing a hierarchy of town centre uses.

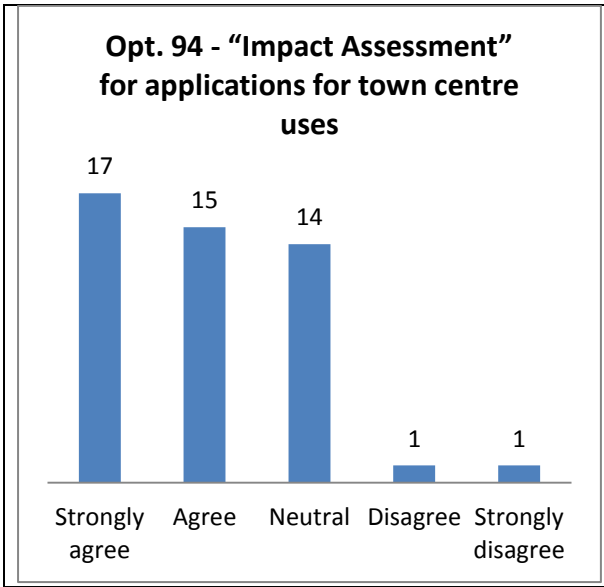
Opt. 93: The “sequential approach” and “sequential test”: location of town centre uses

Summary of responses

Additional Comments
The majority of comments received were in support of the preferred option. A few comments expressed concern and/or confusion about focusing development in the city centre above district centres or other areas, when the city centre already receives the bulk of development and people.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The approach set out in the preferred option is based on the NPPF requirements for the location of town centre uses. While the NPPF references accessibility and connectivity to the centres as its criteria, councils have the ability to apply their own criteria based on specific local conditions and needs. The approach is demonstrated in policies V1 and V2.

Opt. 94: "Impact Assessment": threshold for requiring an impact assessment for applications for town centre uses that are not located in existing centres

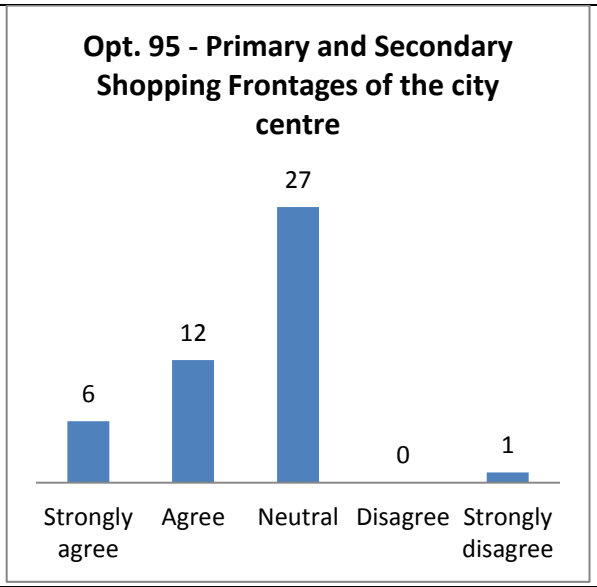
Summary of responses



Additional Comments
The majority of comments received were in support of the notion of a required 'Impact Assessment'. Several comments suggested alternative thresholds of 250 sqm or 300 sqm in order to capture convenience-sized grocery stores; or 750 sqm for out-of-centre locations.

How these comments were taken into account in the proposed submission draft
The overall support for the inclusion of an appropriate policy is noted and welcomed. The approach set out in the preferred option is based on the NPPF requirements for an impact assessment for town centre uses proposed outside of existing centres. However the nationally set threshold is for development areas 2500 sqm or greater, which is not likely to capture a significant proportion of proposals likely to come through in the city. Policy V1 sets out a minimum threshold of 350 sqm which is set according to evaluated local conditions, along with other criteria with respect to accessibility.

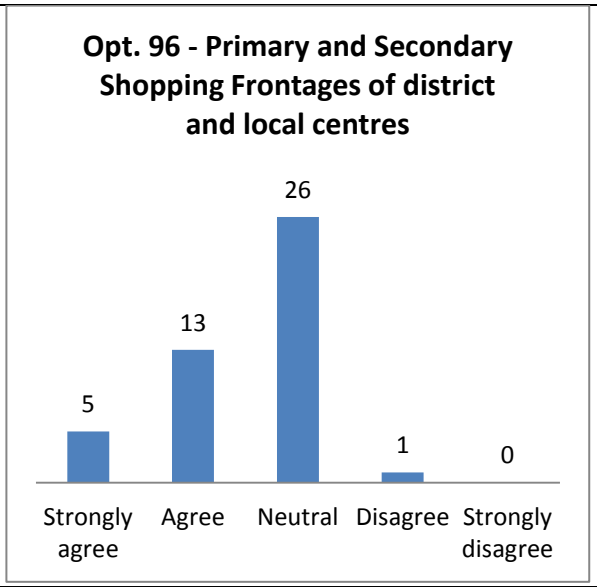
Opt. 95: Primary and Secondary Shopping Frontages of the city centres

Summary of responses


Additional Comments
The bulk of comments received expressed support for the preferred option or individual aspects of the preferred option. Ensuring the maintenance of small, independent, retail units in the Covered Market and along High Street was a popular point. Supporting a more flexible and efficient use of upper floors (especially for residential purposes) was also a popular aspect of the preferred option. A few comments expressed a preference for allowing free market forces to guide development patterns. A few comments expressed opposition to the general notion of Oxford being a shopping and/or corporate retail destination.

How these comments were taken into account in the proposed submission draft
On further consideration, the council will follow a more flexible approach which is acknowledged to be contrary to the preferred option. Bearing in mind the uncertainties around the retail sector, particularly with changes in shopping habits and declines in the use of physical premises, the council has decided on a more flexible approach whereby there would be no minimum thresholds and due consideration will be given to any proposals subject to specified criteria. The expectation is that this approach will give more scope for the long term viability and vitality of the city centres.

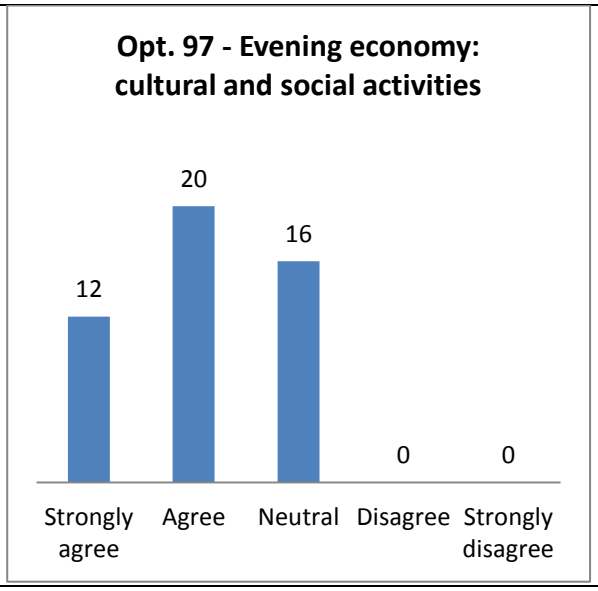
Opt. 96: Primary and Secondary Shopping Frontages of district and local centres

Summary of responses


Additional Comments
Few additional comments were made relating to this option. A few comments expressed support for the preferred option. A few comments suggested alterations to the boundaries of the district/local centres (and the possible inclusion of other areas; Magdalen Road and Little Clarendon Street). One comment queried the requirement to maintain 85% Class A use in district/local centres when the city centre requirement is lower.

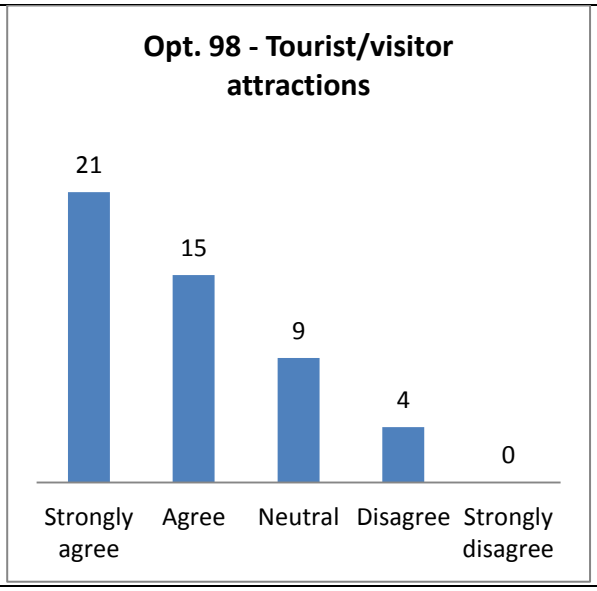
How these comments were taken into account in the proposed submission draft
On further consideration, the council will follow a more flexible approach which is acknowledged to be contrary to the preferred option. Bearing in mind the uncertainties around the retail sector, particularly with changes in shopping habits and declines in the use of physical premises, the council has decided on a more flexible approach whereby there would be no minimum thresholds and due consideration will be given to any proposals subject to specified criteria. The expectation is that this approach will give more scope for the long term viability and vitality of the city centres.

Opt. 97: Evening economy: cultural and social activities

Summary of responses

Additional comments
The greatest number of comments were in support of the preferred option. One comment preferred to delete the phrase 'protects existing venues' from any future policy. A few other comments expressed concerns about anti-social behaviour and the belief that bars and night clubs should be discouraged for cultural activities.

How these comments were taken into account in the proposed submission draft
The general support for the proposed policy approach is welcomed and comments noted. The preferred option is reflected in policy V5, which addresses the approach towards cultural and social activities in the city. The emphasis of the policy is on encouraging the development of suitable venues subject to specified criteria and compliance with policies V1 and V2. Existing facilities will be protected in accordance with the policy.

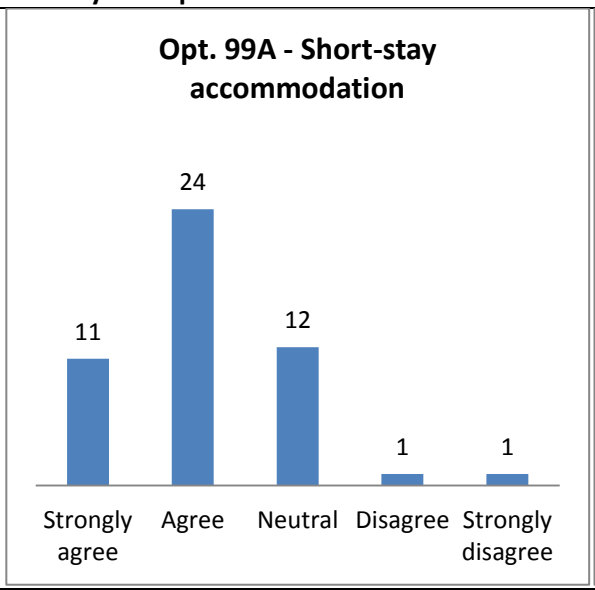
Opt. 98: Tourist/visitor attractions

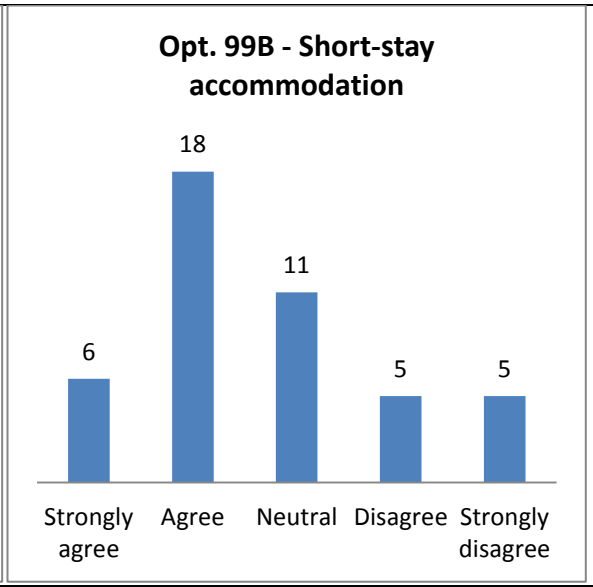
Summary of responses

Additional comments
Several comments received supported the preferred option. Beyond that, a few comments were received which supported Alternative Option B: that expressed opposition to any new tourism-oriented development; which expressed worry that restrictions may have unintended negative economic consequences; and which expressed concern that the scope and scale of tourism in Oxford is insufficiently considered and addressed in the local plan.

How these comments were taken into account in the proposed submission draft
The preferred option is integrated into policy V4, which contains specific requirements for the development of new tourist attractions. The preferred option is largely adopted in entirety, foucssing on high levels of accessibility, good relationships to existing and proposed attractions and appropriateness of the city. The policy is not written as a blanket restriction on all new attractions but emphasises appropriate development that has positive impacts.

Opt. 99: Short-stay accommodation (hotels and guest houses)

Summary of responses





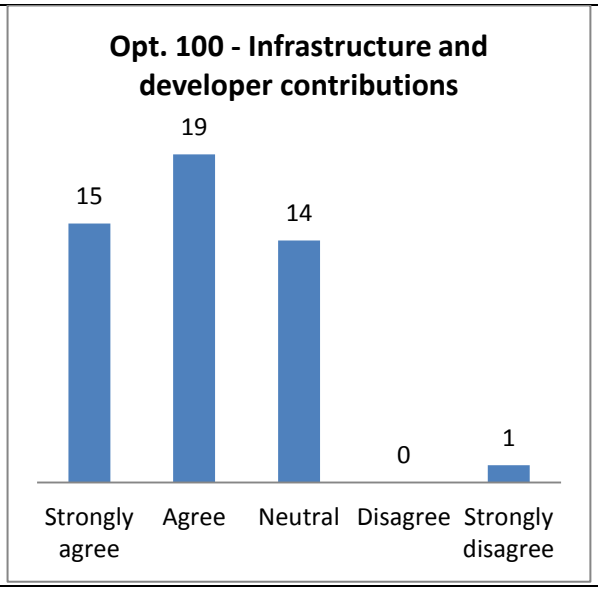
Additional comments

The greatest number of comments were in support of the preferred options. Several comments supported Preferred Option B specifically. Numerous comments expressed concern about the impact of new short-stay accommodations on traffic and permanent housing stock. Several comments suggested that any new hotels ought to be located according to the sequential test approach (as discussed in Preferred Option 93), but also that any development in the city centre could cause damaging effects. One comment was in support of Alternative Option D.

How these comments were taken into account in the proposed submission draft

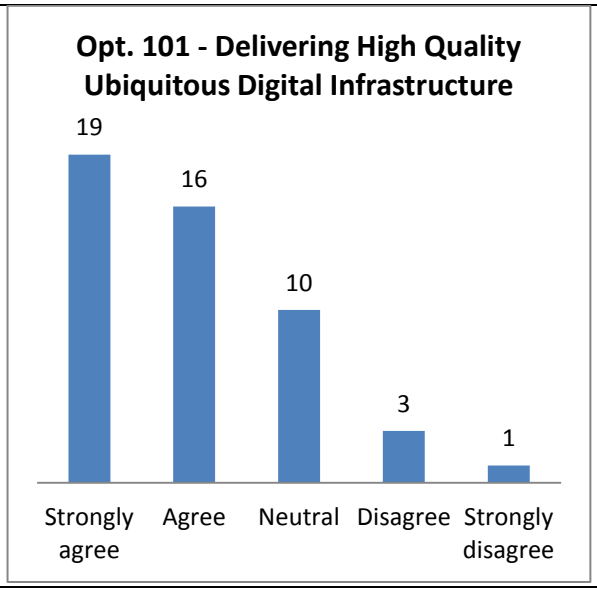
The preferred options are integrated into policy V4, which addresses the development of new short stay accommodation. The policy restricts new development where it is demonstrated that there would be unacceptable impacts on movement in the city and where there will be losses in residential dwellings or unneighbourly impacts to nearby residents. Losses or changes of use of existing accommodation will be considered subject to set criteria in order to mitigate adverse impacts on the existing need for such facilities. This policy will not be applied in isolation when development proposals are submitted, other policies that address design, movement impacts etc will be considered in order to deliver the best possible outcome for the city's residents and economy.

Opt. 100: Infrastructure and developer contributions

Summary of responses

Additional comments
The greatest number of comments received were in support of the preferred option. Following that, numerous comments were received expressing concern about the current state of infrastructure in the city and its ability to deal with an increase in housing; as well as a desire to funnel any income received into social infrastructure and leisure infrastructure. The current CIL regime that the city operates was lamented by one commenting organisation. Strong support was expressed for investing any contributions into sustainable transportation infrastructure. One comment suggested greater transparency for the contributions/levies system and how it gets spent.

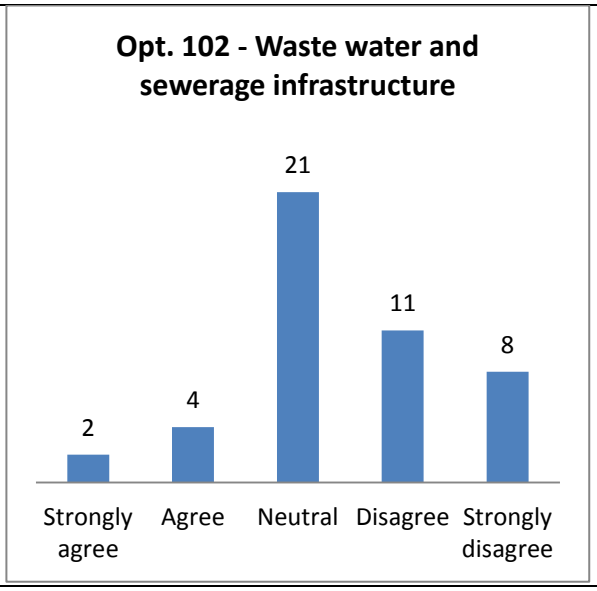
How these comments were taken into account in the proposed submission draft
The CIL regime is set out in national guidance and must be followed. The City Council will update its CIL charging schedule and will also publish an Infrastructure Delivery Plan alongside the draft submission Local Plan.

Opt. 101: Delivering High Quality Ubiquitous Digital Infrastructure

Summary of responses

Additional comments
The greatest portion of comments received were in support of the preferred option. Several other comments stressed the importance of the topic and support for the argument that developers ought to contribute towards this infrastructure as well. A few comments expressed concern that technology develops and changes so quickly that any policy may be too prescriptive and thus rendered obsolete in time.

How these comments were taken into account in the proposed submission draft
The preferred option is reflected in policy V7, which requires developers to provide evidence of adequate utilities capacity to support their proposals and states a mandatory site area threshold at which qualifying developments must provide quality digital facilities. The policy is worded in such a way as to allow for developments in technology and avoid over-prescriptiveness.

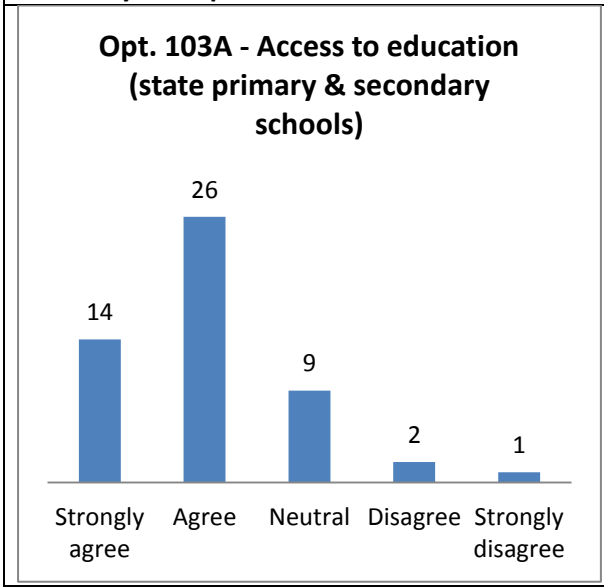
Opt. 102: Waste water and sewerage infrastructure

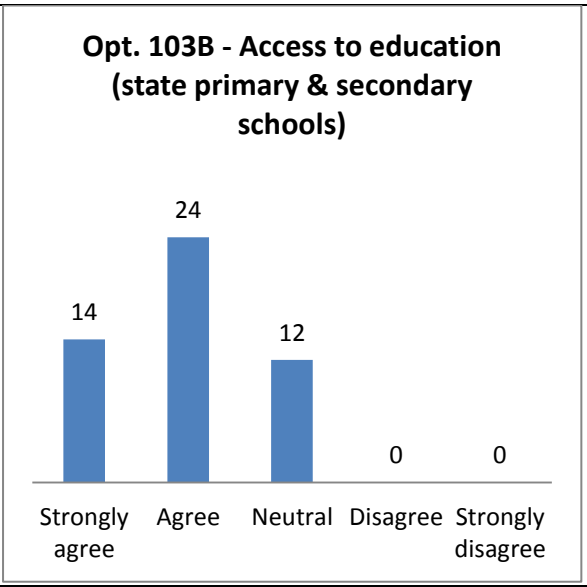
Summary of responses

Additional comments
The greatest portion of additional comments received were in support of the preferred option. Several comments questioned Thames Water and their interest/commitment to infrastructure and service provision; whilst suggesting that the City Council should have greater responsibility. Several objections to the preferred option were received based on NPPF para.156, and on querying how it can make sense to permit development unless capacity for infrastructure is possible. Three comments supported Rejected Option B.

How these comments were taken into account in the proposed submission draft
There is no specific policy in relation to waste and sewerage infrastructure included in the proposed submission draft, however policy V7 requires developers to demonstrate that their sites have the utility and infrastructure capacity to adequately serve the needs of their proposals.

Opt. 103: Access to education (state primary and secondary schools)

Summary of responses





Additional Comments

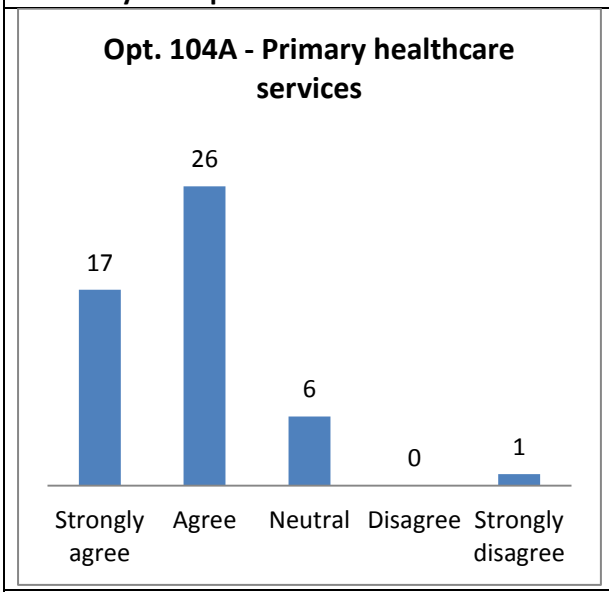
Several comments were received in support of the preferred options – one comment specifically for Preferred Option B. Oxfordshire County Council noted what they are doing to address this topic. Other comments received asked for a new secondary school for south Oxford and west Oxford; argued that further intensification of existing school sites will result in enlarging schools that are already too large; and pointed out that associated playing space should not be lost through any intensification process.

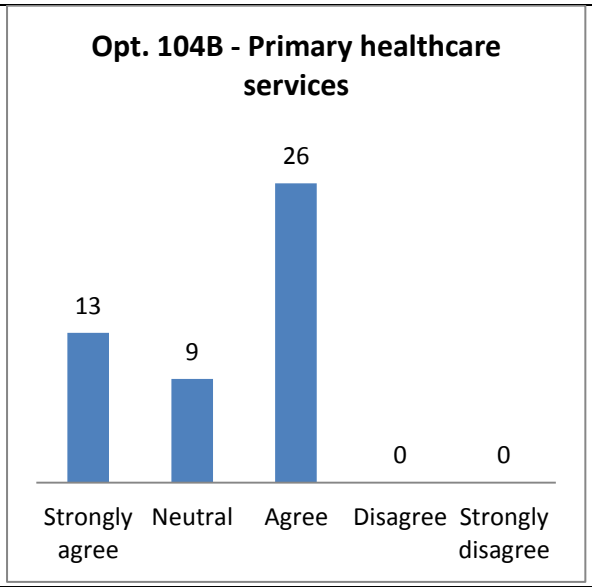
How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed.
Policy V6 specifically addresses social and community infrastructure, including educational facilities, and sets out the general principle of supporting the expansion of existing facilties and proposals for new suitably sited and sustainable facilities where there is an identified need. Loss of facilities will not be considered unless new or improved replacements are provided at an equally or more accessible location.

Opt. 104: Primary healthcare services

Summary of responses





Additional comments

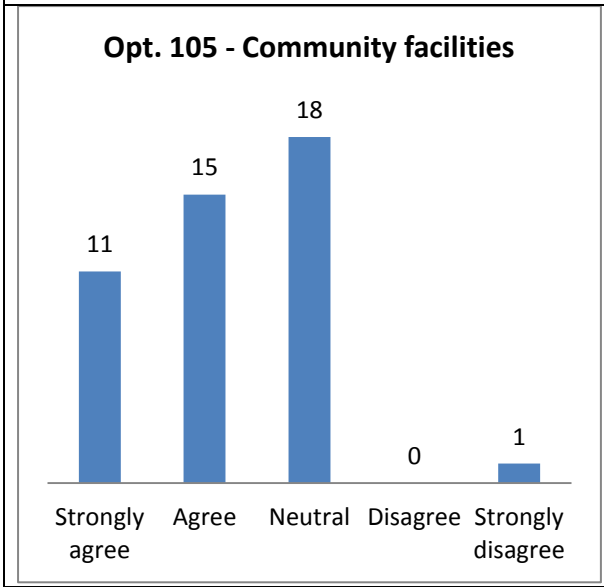
All comments received emphasised importance of and need for new healthcare service provision facilities. Strong support was expressed for the preferred options, with extra comments noting support specifically for Preferred Option B and the importance of ensuring that any new housing developments also include new primary healthcare service provision so that the current strains on existing healthcare provision facilities are not exacerbated further.

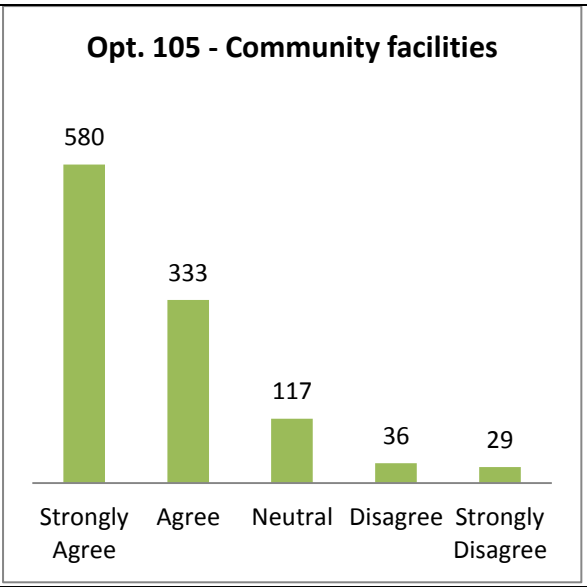
How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed. Policy V6 specifically addresses social and community infrastructure, including primary healthcare providers, and sets out the general principle of supporting the expansion of existing facilties and proposals for new suitably sited and sustainable facilities where there is an identified need. Loss of facilities will not be considered unless new or improved replacements are provided at an equally or more accessible location.

Opt. 105: Community facilities

Summary of responses





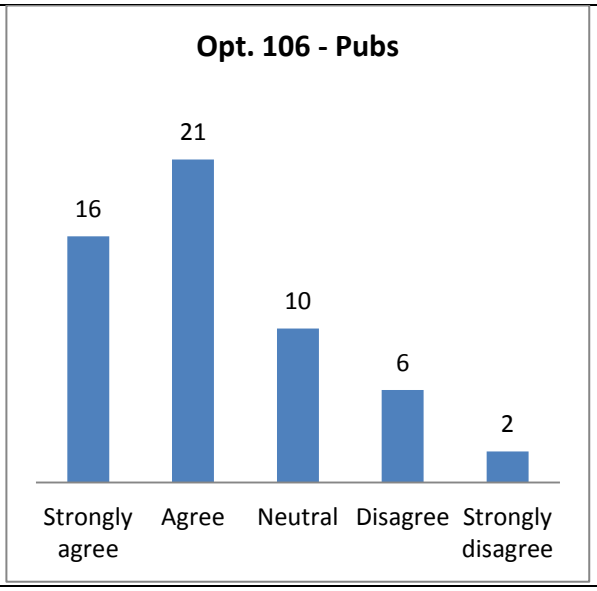
Additional comments

Substantial support was given for the preferred options. However, the largest portion of comments received objected to the preferred options, arguing that no community facilities should be allowed to be lost at all (i.e. blanket protection as outlined in Alternative Option B). Numerous other submissions received were more specific comments relating to local, individual concerns such as post offices in East Oxford, leisure facilities in Cowley, public facilities in Marston, and shops in Botley and Blackbird Leys. Numerous comments queried how terms such as 'exceptional', 'nearby', and 'significant' would be defined in the policy. Several comments pointed out that many community facilities are too expensive for residents to use at the moment. Several comments objected to the preferred options citing para.74 of the NPPF. One comment suggested a (written) policy that combines cultural and community facilities. Generally, the sentiment expressed in nearly all comments was one of concern that no matter the details of the end policy, the importance of community facilities must be understood and taken seriously into account.

How these comments were taken into account in the proposed submission draft

The overall support for the inclusion of an appropriate policy is noted and welcomed.
Policy V6 specifically addresses social and community infrastructure, including community facilities, and sets out the general principle of supporting the expansion of existing facilities and proposals for new suitably sited and sustainable facilities where there is an identified need. Loss of facilities will not be considered unless new or improved replacements are provided at an equally or more accessible location. While the policy is not written as a blanket protection of all community facilities, it is considered sufficiently strong to prevent inappropriate development and to make provision for suitable replacements facilities. The requirements of the NPPF are deemed to have been met.

Opt. 106: Pubs

Summary of responses

Additional comments
The greatest portion of comments were in support of the preferred option. A few comments expressed concern about the loss of pubs in Marston. A few comments stressed the importance of pubs and argued that every possible protection ought to be extended to them. Several comments pointed out that pubs are closing because of declining demand, and they should not be protected if they are not in sufficient demand to be viable. One comment suggested the use of a viability test.

How these comments were taken into account in the proposed submission draft
The preferred option is reflected in policy V5, which in part addresses the specific issue of public houses. It sets out criteria against which proposals for changes of use will be assessed.

Appendix 1: statutory consultees

EE
Three
Vodafone and 02
Beckley & Stowood Parish Council
Elsfield Parish Council
Garsington Parish Council
Gosford and Water Eaton Parish Council
Horspath Parish Council
Kennington Parish Council
Littlemore Parish Council
North Hinksey Parish Council
Sandford on Thames Parish Council
South Hinksey Parish Council
Stanton St John Parish Council
Woodeaton Parish Council
Wytham Parish Council
Blackbird Leys Parish Council
Cherwell District Council
Civil Aviation Authority
Environment Agency
Highways Agency
Historic England
Homes and Communities Agency
National Grid UK
National Health Service Commissioning Board
Natural England
Network Rail
NHS Oxfordshire Clinical Commissioning Group
Office of Rail Regulation
Old Marston Parish Council
Oxfordshire County Council
Oxforshire Local Enterprise Partnership
Risinghurst and Sandhills Parish Council
Scottish and Southern Energy
South Oxfordshire District Council
Thames Valley Police

Thames Water Property Services
The Coal Authority
The Office of the Police and Crime Commissioner for Thames Valley
Vale of White Horse District Council
West Oxfordshire District Council
Wild Oxfordshire

Appendix 2: additional local groups and organisations contacted directly

Bartholomew Road Allotments Association	Oxford Historical Society
Barton Fields Allotment Association	Littlemore Local Historical Society
Cripley Meadow Allotment Association	Iffley History Society
Town Furze Allotment Association	Wolvercote Local History Society
Trap Grounds Allotment Association	Oxfordshire Buildings Record
Barns Court Allotment Association	Build a Dream Self Build Association
Barracks Lane Allotment Association	Diamond Cottages Residents Association
Bartlemas Close Allotment Association	Feilden Grove Residents Association
Bullstake Close Allotment Association	Iffley Fields Residents Association
Cutteslowe Allotment Association	South Oxford Residents Association
East Ward Allotment Association	Hinksey Park Area Residents Association
Fairacres Road Allotment Association	St Margaret's Area Society
Fairview Allotment Association	Pullen's Lane Association
Ingle Close Allotments	Oxford Waterside Residents Association
Kestrel Crescent Allotment Association	Residential Boat Owners' Association
Lower Wolvercote Allotment Association	Co-ordinating Committee of Headington Residents' Associations (CCOHRA)
Marston Ferry and Blackhall Allotment Association	Apsley Road Residents Association
Mill Lane Allotment Association	Central Ward Residents Association
Osney, St Thomas & New Botley Allotment	New Marston South Residents Association

Association	
Ramsey Road Allotment Association	Central North Headington Residents' Association
Risinghurst Allotment Association	Harberton Mead Residents' Association
Rose Hill (Lenthall Road) Allotment Association	Headington And St Clements Residents' Associations
South Ward Allotment Association	Highfield Residents' Association
Spragglesea Mead and Deans Ham Allotment Association	Hill Top Road Residents' Association
St Clement's Allotment Association	Hobson Road Group
Upper Wolvercote Allotment Association	Horspath Road Area Residents' & Tenants' Association
Van Diemans Lane Allotment Association	Jack Straw's Lane Residents Association
Watlington Road Allotment Association	Jordan Hill Residents' Association
Oxford and District Federation of Allotment Associations	Moreton Road Residents' Association
Blackbird Leys Allotment Association	Polstead Road Residents' Association
Binsey Lane Allotment Association	St John Street Area Residents' Association
Headington and District Allotments Association	Wood Farm Area Tenants' & Residents' Association
Friends of Old Headington	York Place Residents' Association
Friends of North Hinksey	Divinity Road Area Residents Association (DRARA) Planning Action Group
FOXCAN	Osney Island Residents Association
CPRE Oxfordshire	Falcon Close Resident's Association
Friends of Cutteslowe and Sunnymead Park	East Oxford Residents Association Forum
Friends Of Iffley Village	Headington Hill Residents Association
Friends Of Quarry	London Place Residents Association
Friends Of Warneford Meadow	Middle Cowley Action Group
Iffley Fields Community Nature Plan Group	Northway Action Group
North Oxford Association	Stoke Place Residents' Association
Oxford Civic Society	Alhambra Residents and Tenants Association
Oxford Green Belt Network	Argyle Street Residents Committee
Oxford Preservation Trust	Aston Street Residents Association
Park Town Trust	City of Oxford Bed and Breakfast Residents Association
Rescue Oxford	Beauchamp Place Residents Association
Summertown Riverside Group	Barton Howard House Residents Association
Wolvercote Against Masts	Benson Place Residents Association
Friends of Bury Knowle Park	Bainton Road and District Residents Association
Friends of Holy Trinity Church	Bridge East Street Residents
Barton Community Association	Bath Street Residents Association
ENGAGE Oxford	Binsey Village Residents Association
East Oxford Action	Cunliffe Close Residents Association
Residential Landlords Association	Cordrey Green Residents Association
Headington Action	Chalfont Road Residents Association

Jericho Wharf Trust	Canal Walk Residents Association
BOAT Boaters of Oxford Action Team	Dorchester Court Residents Committee
Cutteslowe Community Association	Dove House Close Residents Association
South Oxford Community Association	Donnington Residents Association
Littlemore Community Association	Easiform Tenants Association
Wolvercote Neighbourhood Forum	Evenlode Tower Residents Association
Headington Neighbourhood Forum	Fairacres Road Residents Association
Summertown St Margaret's Neighbourhood Forum	Fitzherbert Close Residents Association
Blackbird Leys Community Association	Iffley Road Area Residents Association
Bullingdon Community Association	Ferry Hinksey Road Residents Association
Donnington Community Association	Granville Court Residents Association
East Oxford Community Association	Gipsey Lane Council Tenants Association
Florence Park Community Association	The St George's Park Residents Association
Headington Community Association	Gladstone Road Tenants and Residents Association
Jericho Community Association	Heron Place Residents Association
Northway Community Association	Hayfield Road Residents Association
Regal Area Community Association	Jeune Street Residents Association
Risinghurst Community Association	Lathbury Road Residents Association
Rose Hill Community Association	Laurel Farm Close Residents Association
West Oxford Community Association	Little Oxford Residents Association
Friends of Aristotle Recreation Ground	Linton Road Neighbourhood Association
Friends of Florence Park	Leafield Road Residents Association
Friends of Headington Hill Park	Mileway Gardens Residents Association
Friends of Kendall Copse	Old Marston Residents Association
Friends of Aston's Eyot	Norton Close Residents Association
Friends of Lye Valley	New Headington Residents Association
Friends of Raleigh Park	Norham Manor Residents Association
Friends of South Park	Northway Tenants and Residents Association
Friends of the Trap Grounds	North Parade Residents Association
Freemen of the City of Oxford	Nursery Close Residents Association
North Oxford Green Belt Preservation Group	Old Friars Residents Association
Save Port Meadow	Oxford Pegasus Residents Association
Wolvercote Commoners Committee	Plowman Tower Residents Association
Headington Heritage	Paddox Residents Association
Friends of Oxpens Meadow	Park Town Residents Association
St Margaret’s Church	Rose Hill Tenants Association
St Aldate's Parish Church and Centre	Richards Way Estate Residents Association
Oxford Quakers	East Oxford Residents Association
Oxford Muslim Community Initiative	Stephens Road Residents Association
Oxford Hindu Temple & Community Centre	St Ebbes New Development Residents Association

Project	(SENDRA)
The Oxford Buddha Vihara	Stockmore Street Residents Association
Thrangu House Oxford	South Summertown Residents Association
Gurdwara Sri Guru Singh Sabha Oxford	St Anne's Road Residents Association
Advisory Council For the Education of Romany and Other Travellers	St Thomas Residents Association
Oxfordshire Unlimited	Old Temple Cowley Residents Association
Oxford Access Forum	St Aldates Residents Group
Oxfordshire Association for the Blind	Upper Wolvercote Association
Deaf Direct Oxford	Victoria Road Group
Showman's Guild of Great Britain (London and Home Counties)	Webbs Close Action Committee
Age UK Oxfordshire	Woodstock Close Residents Association
Friends, Families & Travellers Community Base	Walton Manor Residents Association
The Travellers Movement	Whitworth Place Tenants Association
Oxford Irish Society	Windmill Road Residents Association
Oxfordshire Youth Support Services	Summertown Riverside Group
Oxford Youth Works	Harefields and Marriott Residents Association
Thames Valley Gypsy and Traveller Association	Wingfield Residents
The Gypsy Council	West Quarter Residents Association
Oxford Asian Cultural Association	Waterways Residents Association
Design Council Cabe	Waterside Residents Association
Oxford Archaeology South	Templars Square Residents Association
Oxfordshire City and County Archaeological Forum	St Mary's Road Residents Association
Oxfordshire Architectural and Historical Society	North Oxford Estates Residents Association
The Twentieth Century Society	Marston Street Residents Association
The Garden History Society	Lye Valley Residents Association
The Georgian Group	Hurst Street Residents Association
The Society for the Protection of Ancient Buildings	HART Residents Association
The Ancient Monuments Society	Essex Street Residents Association
Oxfordshire Gardens Trust	Churchill Residents Association
	Harefields Residents Association

Appendix 3: Consultation report from First Steps Consultation 2016

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• PART 1- SUMMARY OF CONSULTATION ON THE OXFORD LOCAL PLAN 2036

• INTRODUCTION

The Oxford Local Plan 2016-2036 will set out how we want the city to look and feel. It will guide new developments to the right locations while protecting and improving the environment and people's quality of life. It will deliver the new homes, businesses, jobs, shops and infrastructure needed to support the growth of Oxford over the next 20 years and it will be used in determining planning applications and to guide investment decisions across the city.

One of the main principles of the planning system is that local communities and stakeholders should be involved from the outset in the preparation of planning policy documents. The following are the main stages of consultation on the Oxford Local Plan 2016-2036.

First Steps consultation (June-August 2016) (results summarised in this report)

Preparatory work on the Local Plan began in January 2016. Officers began to meet with a range of stakeholders and interest groups to commence conversations on the project. This has included the Universities (and larger colleges), the Environment Agency, Highways Agency, Historic England, Natural England, Thames Water, Oxfordshire County Council and others.

A First Steps consultation was held in the Summer of 2106 with the aim of involving as many people as possible early in the process of producing a new Local Plan. This stage is not a statutory stage of consultation; it is in addition to the formal requirements (see below). This additional stage was incorporated into the project timetable because it was felt that early engagement, before any policy approaches are drafted, is the best time to engage people so that they can really shape the plan. The City Council was also keen involve those who might not normally engage with planning and so instead of using (simply) traditional consultation methods sought to use social media and to go out to where people are going to be - at events already arranged across the city such as the Leys Festival and the Cowley Road Carnival.

Preferred Options consultation (programmed for Summer 2017)

This statutory consultation period on the preferred options for the policies and proposals of the Local Plan will be held in the Summer of 2017. It will involve a variety of methods of public consultation and be aimed to reach a range of groups within the community. The outcomes from this stage of consultation will help the City Council to prepare the Proposed Submission Local Plan.

Proposed Submission consultation (programmed for Summer 2018*)*

Following the analysis of comments on the Preferred Options Document, we will draft a Proposed Submission Document and consult people for a further 6 weeks. Comments must be received in writing (or by email) as they will be submitted to the Secretary of State.

Examination (programmed for Winter 2018/19)

Following the Proposed Submission consultation, there is an opportunity to make minor changes to the Local Plan in response to the comments made, before the document, evidence base and comments received are submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the Proposed Submission Document have the right

to ask the Inspector to be heard in person at the examination. If the document is found sound, changes recommended by the Inspector are made and the document is taken to Full Council to formally adopt it.

First Steps consultation process

Consultees

The City Council conducted an extensive consultation exercise over the Summer of 2016 to publicise the project and engage the Oxford community in the plan making process. The First Steps consultation aimed to involve residents, workers, students and visitors to Oxford as well as stakeholders and service providers.

Consultation materials

At this stage in the Local Plan project the material that was published was focused on introducing the project (the scope and timetable) and on providing background information and asking questions on the themes and trends that the plan will seek to address. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind:

For people who have 5-10 minutes to get involved:

- Leaflet (equivalent 2 sides of A3) with basic information and simple tick-box questionnaire with a freepost reply

For people who have up to half an hour:

- Summary booklet (12 sides of A4) with more information and statistics accompanied by an online, more in-depth questionnaire

For stakeholders and those with more interest/time:

- A series of background papers on each topic/issue the plan will be looking at with data analysis and identified trends
- A Sustainability Appraisal Scoping Report

For Duty to Co-operate bodies:

- All the above and a Duty to Co-operate Scoping Strategy identifying the issues which fall under the duty to co-operate and those bodies with which co-operation may be necessary

The materials described above were available:

- on the Council's website
- at the reception desk of the main Council offices
- in 8 local and the central library
- on request

In addition the leaflet was made available:

- in 19 community centres
- in 6 sports and leisure centres

Consultation methods

Publicity:

The First Steps consultation was publicised through the following channels:

- notifying those on the City Council's online consultation database
- notifying statutory consultees and Duty to Co-operate bodies
- advance notice was given to residents groups and amenity groups
- publishing information on our webpage (including introductory videos)
- the City Council's social media channels (Facebook and Twitter including paid adverts on Facebook)
- adverts in local newspapers (Oxford Times and Oxfordshire Guardian)
- adverts on the Oxford Mail website
- "Your Oxford" which goes to all households in the city
- a press briefing with the Oxford Times
- a briefing for the BBC
- posters distributed to community noticeboards
- mail outs from community and amenity groups to their own members (e.g. Civic Society contacted all 800 of their members)
- local members (some of whom distributed leaflets in their wards)
- advertising through attendance at local groups and forums

Events attended:

A stall or a stand was booked and manned at a series of events that were held across the city during the consultation period. These events were picked to ensure a good coverage of the city geographically, a variety of types of events and those which could ensure a good footfall.

Saturday 25th June	Flofest, Florence Park
Saturday 2nd July	Leys Festival, Blackbird Leys Park
Saturday 9th July	West Oxford Fun Day, Botley Park
Sunday 10th July	Cowley Road Carnival, Cowley Road
Saturday 16th July	East Oxford Farmer's & Community Market, East Oxford Primary School
Saturday 16th July	Headington Farmer's Market
Sunday 17th July	Summertown Farmer's Market
Wednesday 20th July	Gloucester Green Market, Gloucester Green
Saturday 23rd July	Eid Festival, Rosehill Community Centre and Park
Saturday 24th July	South Oxford Farmer's & Community Market, South Oxford Community Centre
Saturday 30th July	Grandpont Playday, South Oxford Adventure Playground

Events were attended by Planning and Regeneration officers on a rota and the stall comprised a gazebo with branded flags and bunting. Officers sought to engage those at the events in conversation about what they'd like the city to be like in 20 years' time and to distribute leaflets. Inside the gazebo was a range of activities available including a themed vote, question boards for comments to be added, large scale maps; and for children a drawing activity and balloons to take away.

- ## PART 2- SUMMARY OF RESULTS

- ## CONSULTATION RESPONSES

At the close of the consultation, 608 responses had been received. 267 responses were submitted via the online questionnaire, 263 responses were posted in reply to the leaflet questionnaire, and 78 were other written responses. Responses are summarised in this section and are structured by topic.

The leaflet questionnaire contained 7 sets of questions with multiple statements against which respondents could tick if they agreed, plus an additional 3 open-ended questions at the beginning and end of the questionnaire. The results are illustrated below in a graph (in green) summarising the number of the 263 respondents who agreed with each statement. The additional comments written in the comment boxes are also summarised.

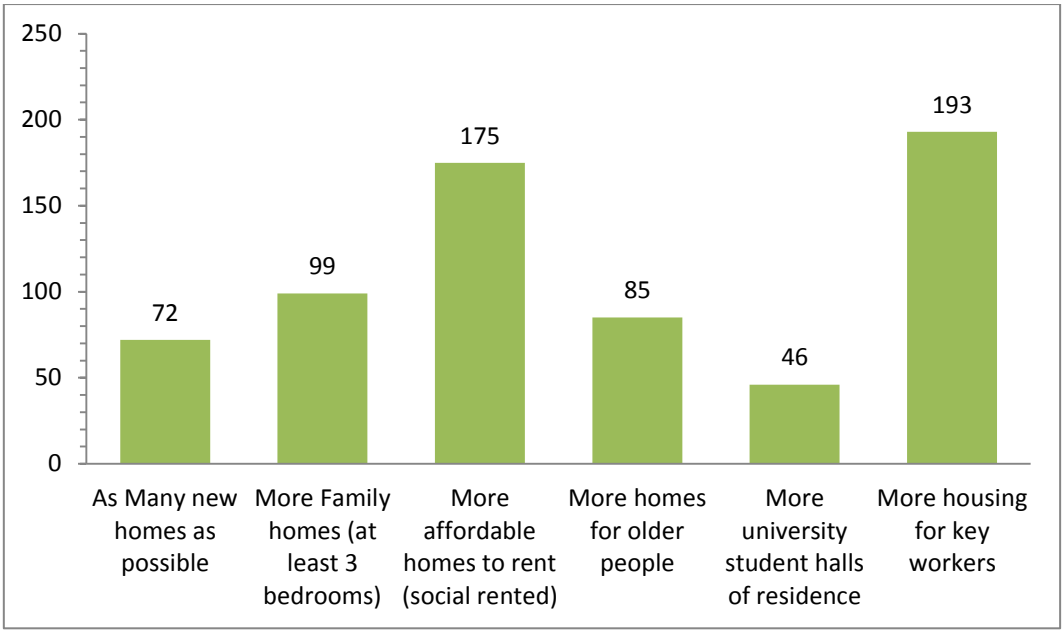
The online questionnaire was linked to the consultation booklet and contained more detailed questions. Respondents were asked to show how strongly they agreed with each statement. Graphs of these responses are shown below (in orange). Further comments written in the comment boxes of the online questionnaire are also summarised.

Many emails and letters were also sent in response to the consultation. These are summarised by topic and are shown at the end of each of the topic sections below.

- ## THEME 1: LIVING AND HOUSING

The following graphs illustrate the numbers of people who agreed with the statements on living and housing. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the living and housing statements in the leaflet questionnaire

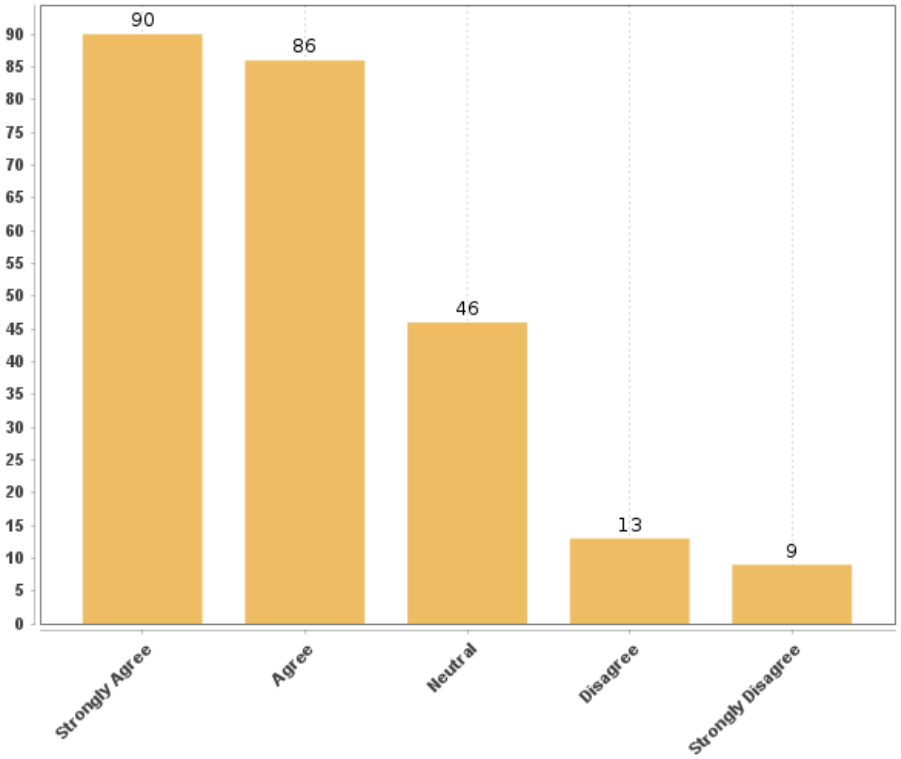


Sustainable building, environment and design

3 people commented that more co-friendly housing with features such as green roofs should be built. 6 people commented that design was important so that new buildings should enhance the environment - suggestions included more trees to help adapt to climate change, individually designed builds, domestic buildings to be no more than 5 storeys and that the University should make a commitment to enhancing the environment when building.

Key worker housing

Graph of online questionnaire results: Some housing sites should be protected for key worker housing



23 people mentioned the importance of housing for key workers (or cheaper housing for workers in the city), including NHS workers, school workers and care assistants working with the elderly; and particularly family housing for key workers. Providing key worker housing was seen as a way to help schools, universities and hospitals to fill vacancies, without encouraging commuting. Several respondents noted the particular need for key worker housing in Headington and some that there was already enough student and elderly accommodation but that housing for hospital staff was badly needed. There was some concern key worker homes could be sold on as non-key worker homes.

Housing numbers and where to build new housing

11 people said that there is a severe shortage of new housing and acknowledged the general need to provide more. A lack of couples/family housing to buy was specifically mentioned. 1 respondent said that there must be a limit on growth and greed. 1 respondent said they are disappointed with the Council prioritizing the building of unaffordable and inaccessible housing. 3 others said that analysis of data and understanding of demand was needed to make decisions on this matter. 1 respondent said they disputed the data used as a basis for the plans and another said we should wait to see the effects of Brexit as it could release housing.

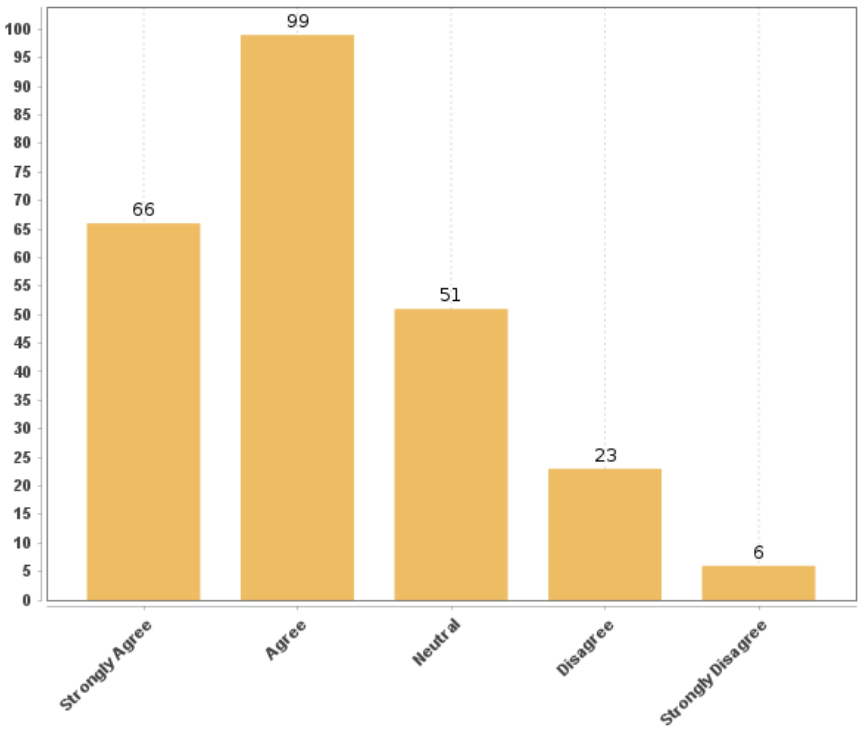
15 people said that building on brownfield sites and re-using land for housing, particularly underused industrial and other employment land and any under occupied land (1 suggesting public car parks such as Marsh Park), should be a priority, as well as ensuring new sites are allocated for housing development rather than business development. 1 respondent said it is important to avoid infill building in existing gardens and the overdevelopment of areas. 4 people said that it is better to build outside the ring road to prevent overcrowding within because it is accessible and 1 said there should be no new housing developments in the villages as it is ruining the countryside and village life. 1 respondent suggested science parks should have top-floor apartments for graduate students and 2 respondents said student housing should be moved to a campuses out of town. 3 respondents cautioned building on flood plains.

Affordability of housing

24 mentioned the strong need for affordable/social housing for those on lower incomes and support for council homes, housing associations and social rented housing, with 1 mentioning shared ownership. Many mentioned issues resulting from the lack of affordable housing including holding back the economy, long commutes and impoverishment of working classes. Many of these respondents mentioned specific groups whose needs should be considered, including adults living with their parents, vulnerable people who are homeless or at risk. 2 mentioned the importance of retaining affordable housing was mentioned with the suggestion of revoking right to buy. 1 mentioned lowering private rent or increasing social rent so the gap is smaller, and 2 said the number of private rentals should be capped. 2 respondents said that social housing should be on mixed new developments. 1 respondent said there should be a focus on new homes for local people who can't afford Oxford property prices.

Housing for specific groups such as the elderly

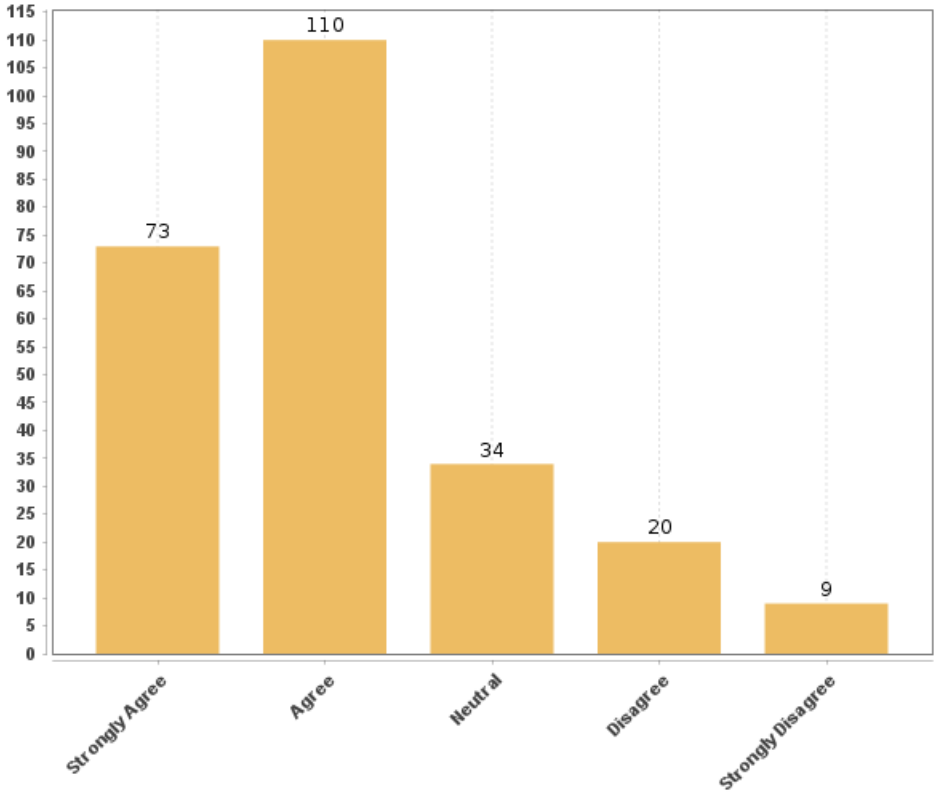
Graph of online questionnaire results: Specialist housing for the elderly would encourage downsizing and release homes



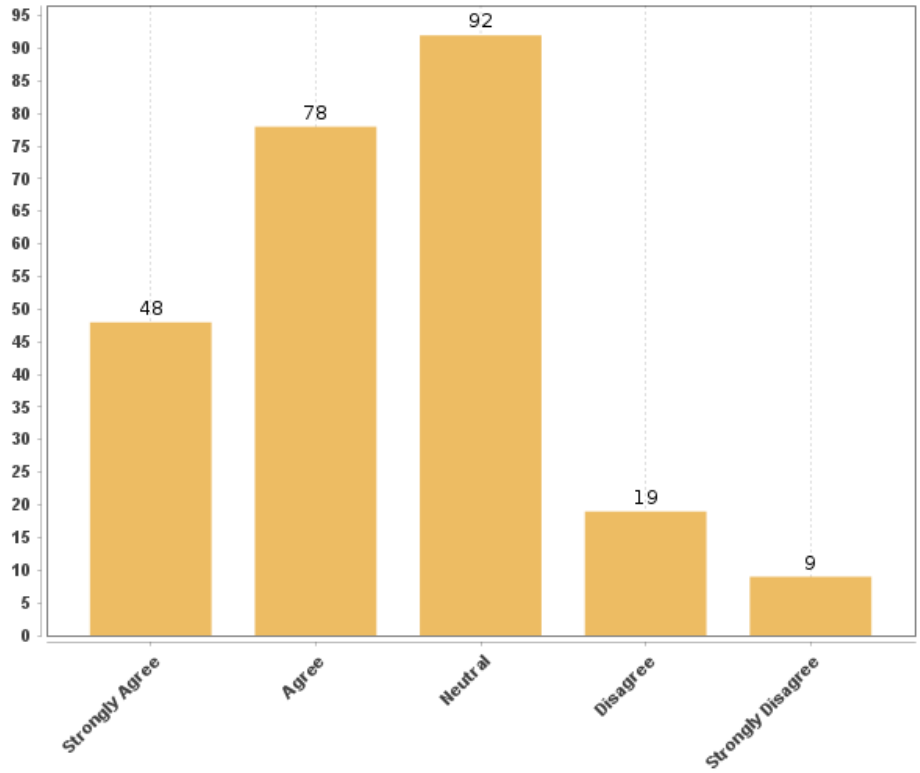
The importance of sheltered accommodation for elderly and other groups was mentioned, as was the need for bungalows with gardens for disabled people who shouldn't be in flats. 9 people commented in support of housing for the elderly that would encourage people to downsize and enable them to stay even when frail, although it was also pointed out that people shouldn't feel pressured to move, that complexes should be attractive and accessible, should be in the general community (elderly people should not be segregated) and should have gardens. 3 respondents mentioned that elderly people are often keen to stay in their own homes. Several also commented on how elderly person accommodation should be provided, mentioning the need for space for relatives to stay if visiting. 2 respondents thought there is already enough accommodation for the elderly whilst 2 respondents said housing for the homeless should be a top priority.

Student and university accommodation

Graph of online questionnaire results: Having more student halls would reduce pressure on the housing market


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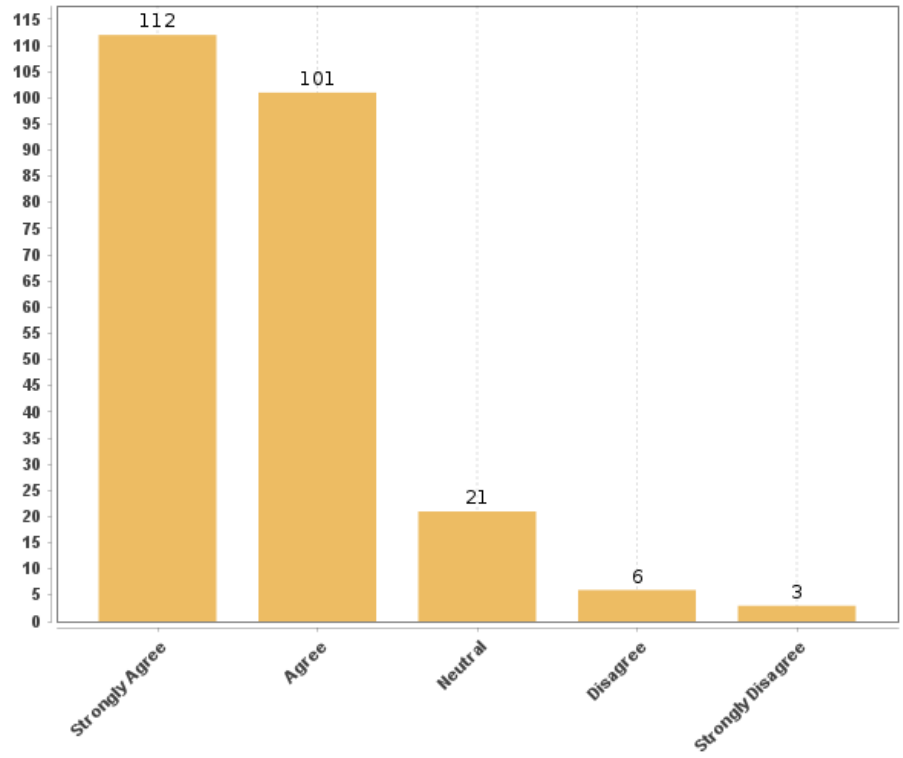
Graph of online questionnaire results: New student halls should be prioritised for the universities (rather than other institutions)



A couple of respondents thought there was too much emphasis on students, who already seem to be taking over in some areas such as Headington, and who already have enough accommodation. 9 respondents said there should be no more student housing, because there is already enough or too much and because additional would just exacerbate the problems, and because they feel it already is taking precedence over family housing, or in one case because the universities are not the reason for the accommodation shortage. 7 thought students should live in halls where possible, and that the Universities should be encouraged/enabled/made to provide enough accommodation. 8 respondents suggested that the solution to pressure on the housing market from students should be to cap student numbers, or to move language schools out of Oxford. The high cost of student accommodation, particularly in respect of its often poor quality was of concern to 2 respondents, and 2 respondents thought that other forms of student accommodation tended to be more attractive to students. In terms of the location of student accommodation, 1 respondent thought it should be located only within existing college land, 1 respondent thought halls should be located near the university only, and 1 respondent thought it should be located in different areas. Another said Brookes should refurbish its halls, rather than selling old ones to build new. 1 respondent asked what the University of Oxford's plans are and one said the University of Oxford is not contributing to Oxford's future.

Balance of dwelling sizes, flats and houses and Houses of Multiple Occupation

Graph of online questionnaire results: A mix of home sizes (number of bedrooms) should be required



10 respondents thought there should be more flats for a range of reasons including to enable higher density, to replace old houses of no historic or architectural importance, to be more affordable (smaller flats), so individuals and couples don't take up family housing and to ensure those living alone are suitably accommodated. 1 respondent said almost all new housing should be 2 bedroomed, another said 1 and 2 bedroomed, and another said there should be more one bedroom and starter homes as family sizes are reducing. 1 respondent thought there should be more homes for young families, and 3 said there is a need for a mixture of housing across the city. 2 respondents thought there should be flexibility, that the balance of dwellings policy makes things worse. 4 respondents said housing should be higher density/more storeys (with good design and facilities), including flats up to 5 storeys or town houses of 3 storeys, and 3 others said there is too much high density housing/a danger of saturating areas/a need to balance new homes with green spaces.

2 respondents thought new HMOs and buy-to-lets should be limited. Another respondent thought HMOs aimed at over 30s should be encouraged.

Housing standards

1 commented that there should be more action taken on sub-standard housing. Another that there should be more innovative flats and shared communal spaces.

Parking

Some respondents commented that car free developments don't work for developments of 2+ beds as families need a car. Another that developers are encouraged to build student accommodation as they do not need to provide parking which should be the case for other types of housing too. The

importance of front gardens that aren't paved over for parking was mentioned by another respondent.

Other housing comments

7 people suggested that rent caps should be introduced, or a tax on property wealth, for example by raising council tax on larger and 2nd homes. 2 people said that housing should be prioritised for local residents, or only sold to those who would have the city as their main residence. 5 respondents had strong views on buy to let, saying that it should not be allowed or that houses should be homes not investments. 2 people said that planning permission should be refused for expensive housing. 11 people suggested innovative housing options should be considered, including community-led co-housing with shared-facilities, self-build, 'capsule' apartment blocks or dormitories for young professionals and short-term visitors, shared building and self-builds, car-free developments and smaller units.

Other comments relating to housing:

- Any new estates need new infrastructure
- Empty industrial units/offices/derelict buildings (including closed down pubs) should be converted into housing complexes
- We should not build more houses, people should go where the houses are
- Family accommodation should be provided near schools
- Expand Oxford to the east with direct access to the John Radcliffe hospital
- Oxfordshire's biggest brownfield sites should be used eg cement works, airfields. New homes should not mean boxes on the edge of small communities
- Build a new town somewhere else
- High quality and aim for passivhaus

Summary of living and housing comments received in letters and emails

Housing numbers

The City Council needs to be better placed to accommodate more of its own housing need, which will require an evolved policy basis**.** (Cherwell DC)

Believe the City Council and partners should review the Oxfordshire SEP and commission a new assessment of the housing market. Needs to be much greater clarity around the population levels the City is planning for (20%+ increase). Is Oxford the right location for this deliberate policy of expansion? By reckless employment creation the City is stretching its capacity to accommodate its own residents. (CPRE)

There is a growing need for additional graduate accommodation in order to relieve the pressure currently being put on the City's housing stock. At present the University and its Colleges are only able to accommodate approximately half of its full time graduate students. It is estimated that the number of graduate accommodation units would need to increase by approximately 2000 units over the next decade. (University of Oxford – Estates)

The city council has identified that its housing need is about 32,000 homes. This is the top end of the Objectively Assessed Need figure identified in the Strategic Housing Market Assessment. The Growth Board work uses a mid-point figure of 28,000 homes. Further justification will need to be provided for the use of the higher 32,000 homes as the OAN figure. (West Oxon DC)

The current protected employment sites should be reassessed with a view to establishing whether the protection of all sites is necessary and whether it would be possible to redevelop some protected sites for mixed use development residential. (Oxfordshire CC)

SHMA and the SEP are both fundamentally flawed and should be revised. (Sunningwell Parishioners Against Damage to the Environment)

City Council must ensure that the evidence base and OAN for housing to 2036 is up to date and update the SHMA accordingly. (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Priority should be to provide housing, using innovative building methods. (Cherwell DC)

Affordable housing

Comments on current policies/situation

The new Local Plan should reflect recent legislation changes by only requiring developments that result in a net development of 10 or more homes to contribute to affordable housing. This will improve economic viability and enable smaller sites to come forward.

Affordable housing policy is restricting the housing supply. The Plan should state that developments of 10 dwellings or less are not required to contribute affordable housing. (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Believe the City has fallen well behind on the housing completion rate set out in the trajectory. (CPRE)

Stringent policies in areas such as environment, archaeology, heritage and conservation add time, complexity, uncertainty and cost to any planning application and construction project. A more streamlined, predictable process would encourage more and faster development. (Magdalen College)

The University considers the lack of land for new homes to be a major part of the problem. (University of Oxford – Estates)

The protection and enhancement of the city's heritage assets should not be subject to meeting its development needs. (Historic England)

Would welcome a stronger enforcement approach in the private rental sector to ensure there is a consistent standard. (Oxford Brookes University)

The City Council must do all it can to increase the supply of affordable housing as set out in the Oxfordshire SHMA (2014). (West Oxfordshire DC)

Suggestions for new affordable housing policies

A more flexible approach should be taken to redevelopment of existing employment sites and under-used recreation land.

Emerging affordable housing policies must be compatible with Starter Homes. It must be clear that Starter Homes will be considered to be affordable housing (Christ Church)

Higher densities and smaller units in the city centre and a greater proportion of family housing where gardens and outdoor space can be accommodated. Affordable accommodation suitable for graduate students and young workers on short-term contracts should be provided. Give flexibility to community-led groups about the mix of affordable homes. (Oxfordshire Community Land Trust)

The Council should seek a site-specific system that takes into account viability. Encouraging a higher level of smaller dwellings and apartments would ensure market housing is more affordable. (Thomas White Oxford Ltd)

Housing to be built by City Council's proposed housing company

A lower percentage obligation, more flexibility on the location and type of affordable housing and the inclusion of "key worker accommodation" within the obligation would all contribute to more sites being brought forward. (Magdalen College)

Council's unwillingness to adopt government policy that development of 10 units or fewer will not have an affordable housing obligation is a further disincentive to development of small sites. Suggest that OCC look at whether some or all of the Starter Homes could be included within the community-led SPD where they could at least be restricted from selling at more than 80%. There is a significant need for self-build in Oxford and ensuring its permanent affordability. (Oxfordshire Community Land Trust)

Consider a more flexible approach to areas of policy where these may restrict housing supply without achieving significant benefit. The definition of Affordable Housing now includes Starter Homes, the Council's affordable housing policies need to be amended and take this into account (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Welcome City Council's recent decision to set up a housing company and urge further consideration of imaginative solutions. (CPRE)

Urge the Council to provide policy support for community-led housing groups. (Oxford Cohousing)

Housing for different groups

Target for student numbers outside of University accommodation

More student halls could reduce pressure on the housing market and student accommodation should not be limited in the way it is now. (CPRE) + (Oxford Brookes University)

The Council should be encouraged to move students into the footprint of the two universities releasing stock for the non-student population. (Magdalen College)

University requires a further 2591 rooms over the next 10 years. The University would welcome their exclusion from the target of no more than 3000 students living in non-university managed accommodation. (Oxford Brookes University)

New student halls should be prioritised for the universities (Oxford Civic Society) + (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Do not agree with suggestion that 'new student halls should be prioritised for the Universities. (Ruskin College)

Purpose-built student accommodation and university-operated accommodation needs to be available (SC Osney Lane Ltd. ("Student Castle")) + (University College)

Provide new specialist accommodation to help free up general housing (South Oxon & Vale of White Horse DCs)

Student halls for undergraduates have already taken over the city.

Elderly person housing

Specialist housing for the elderly would encourage downsizing and release homes (Oxford Civic Society) + (South Oxfordshire and Vale of White Horse DCs)

Age restricted housing can help to enable larger accommodation to be available for larger families. (University College)

Key worker housing

Every Oxford local should have the same opportunity as key workers.

Currently there is no scope for key worker accommodation to be included in the affordable housing obligation. Colleges with land in the City could provide on a rented or shared ownership basis. (Magdalen College)

Requires housing options for staff across all income levels. (Oxford Brookes)

Some sites should be protected for key worker housing but needs should be properly assessed in collaboration with relevant institutions. (Oxford Civic Society)

Sites should be identified for key worker housing, where appropriate. (University College)

Key worker housing should be defined as contributing towards the affordable housing component. (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Other comments on housing

Density of new housing should be increased to 75 units per hectare.

More flexible standards on design and space standards. A range of housing sizes should be provided. (University College)

Some Houses of Multiple Occupation are in poor physical condition but charge high rents; all should be registered.

The new Local Plan should be clear on how Vacant Building Credit will be used.

City Council should ensure developers quickly deliver development. (CPRE)

Distribute growth around existing settlements throughout Oxfordshire. (Kier)

Should be a mix of home sizes but size is not the only variable. (Oxford Civic Society)

Enable the community to build clusters of high quality, high density, mixed-tenure homes, most of which would be permanently affordable. Requires a % of housing on large sites (10% - 20%) for community-led housing including affordable self-build. (Oxfordshire Community Land Trust)

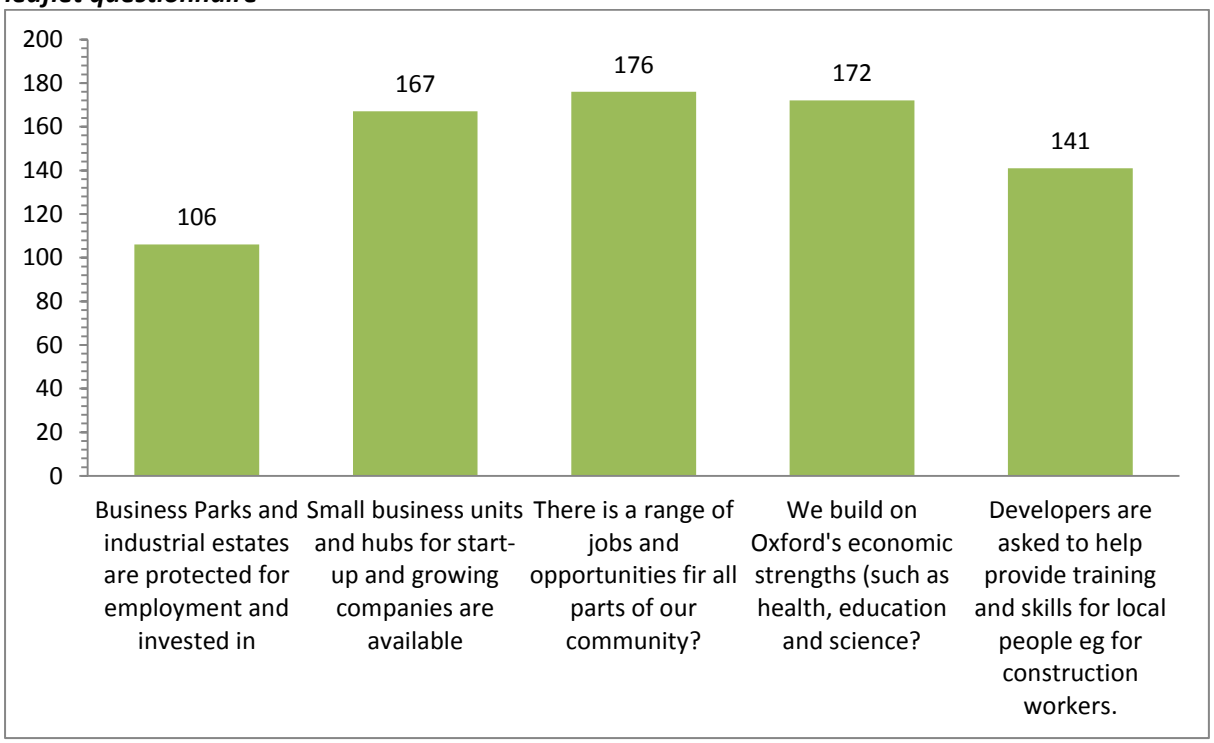
Policy to seek a housing mix on relevant sites should relate to the SHMA or an assessment of local need. (Thomas White Oxford Ltd)
Local plan should support a range of accommodation for institutional needs (including educational). (University College)

Local Plan should accord with the Government's policy and guidance regarding Starter Homes and their relationship with wider affordable housing policy. (University of Oxford,Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

• THEME 2: ECONOMY AND SKILLS

The following graphs illustrate the numbers of people who agreed with the statements on economy and skills. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to economy and skills in the leaflet questionnaire



Employment growth

Some people thought that businesses should be encouraged to locate and grow in the city; that more jobs are needed with diverse job opportunities (9) and that Oxford needs industry and business – car factories (2)

However many people raised concerns about this. These concerns were:

- Land should be used to provide new homes, not for employment development. Mismatch in housing and employment creates infrastructure problems. Some industrial estates could be used for housing
- Business growth is not needed; existing employment sites are not full, Oxford has low unemployment and there are already too many jobs and too few applicants. Stability is more important than growth. Small city identity. Want Oxford to contract

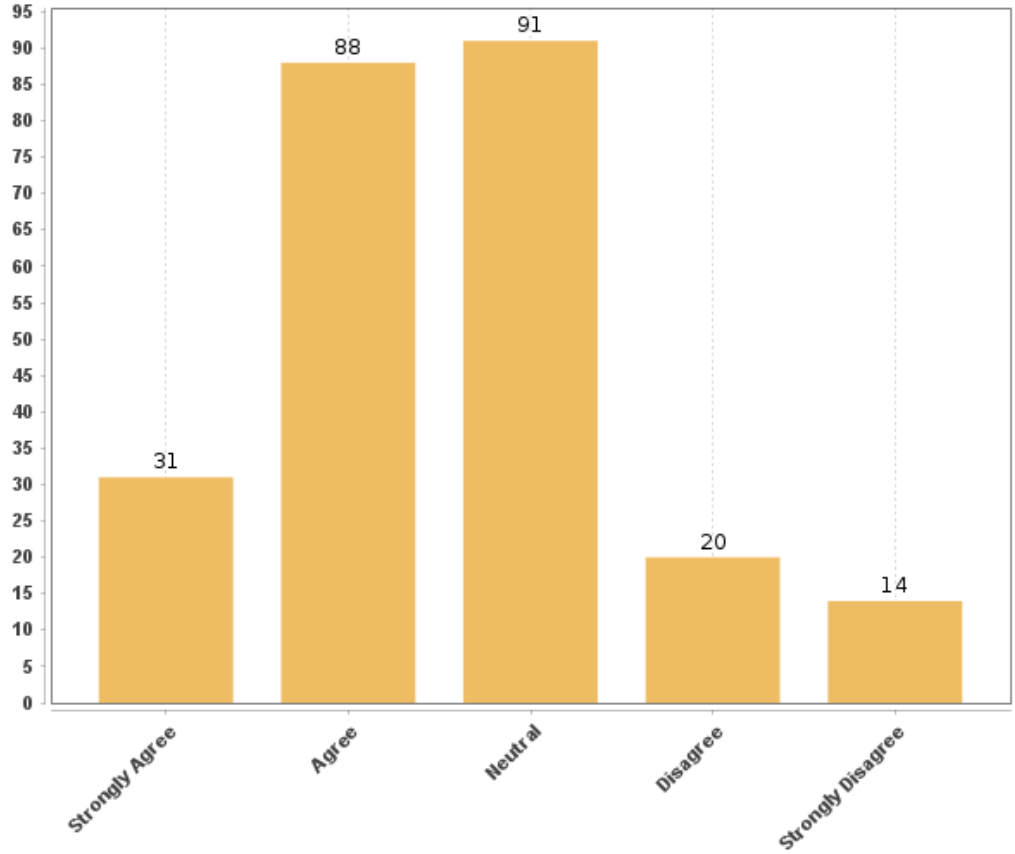
- More employment development will increase pressure on Oxford's housing, natural environment and infrastructure, particularly transport. Creating more jobs will only make Oxford's housing crisis worse. Employment development should not be prioritised above quality of life.
- Oxford has limited space for new businesses and people. The city cannot grow indefinitely.
- Economic growth doesn't necessarily help to address inequalities.

It was clear that most people felt there needed for an appropriate balance between housing and employment. A lot of people suggested that Oxford's housing crisis needs to be addressed before more jobs are created, as otherwise there will be no-where for these new workers to live.

Some people commented that it was important to provide more jobs for local people. It was also suggested that the Local Plan should include a policy on 'Community Employment Plans'.

Protection of employment sites

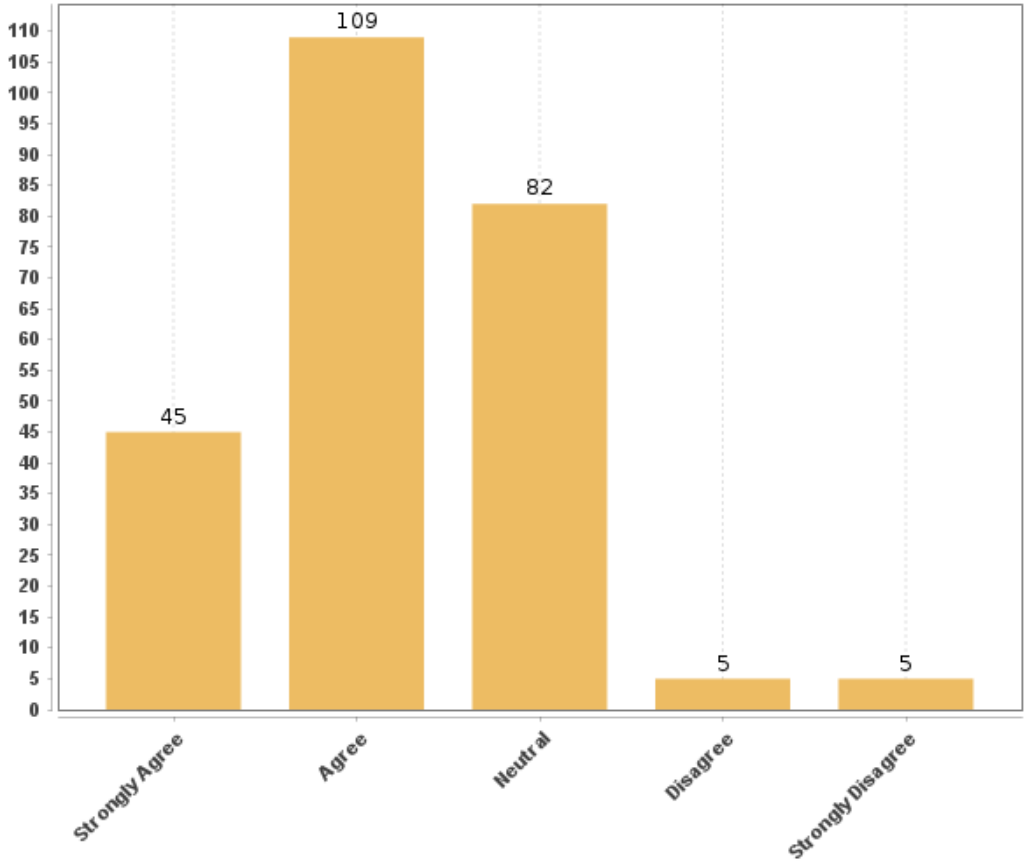
Graph of online questionnaire results: Employment sites should continue to be protected so that businesses can grow



Some people thought that employment sites should be protected. One suggestion was that all office spaces should be protected, not just those in business parks. Another suggestion was that employment sites should be protected but not allowed to grow due to the impacts on housing. However, other people felt that employment sites should not be protected as they should be able to respond organically to market conditions and/or have the potential to provide new homes. 1 respondent thought that we may no longer have economic strengths post-Brexit; another that EU funded sectors and particularly research from Oxford University needs to be protected.

Type of employment development

Graph of online questionnaire results: Live-work units and hubs for small businesses would help start-ups and creative industries



Some people specified the type of employment development that they would like to see. This included a new local 'silicon valley' digital hub and flexible workspaces for the self-employed, including live-work units. Some people felt that large high tech businesses are encouraged at the expense of smaller businesses.

4 respondents commented that there needed to be a better balance of jobs between locals and commuters incomers; 5 that salaries need to reflect the cost of living and 2 that key workers needed affordable housing to protect economy.

Some commented that Oxford will always have a range of job opportunities but that there is a need to focus on low skill jobs and opportunities for those in poorly paid jobs, and others to focus on jobs for school leavers/young people

Some felt that there was currently a great variety of IT/ science jobs and that the university related sectors and science will continue to grow and others a focus on health.

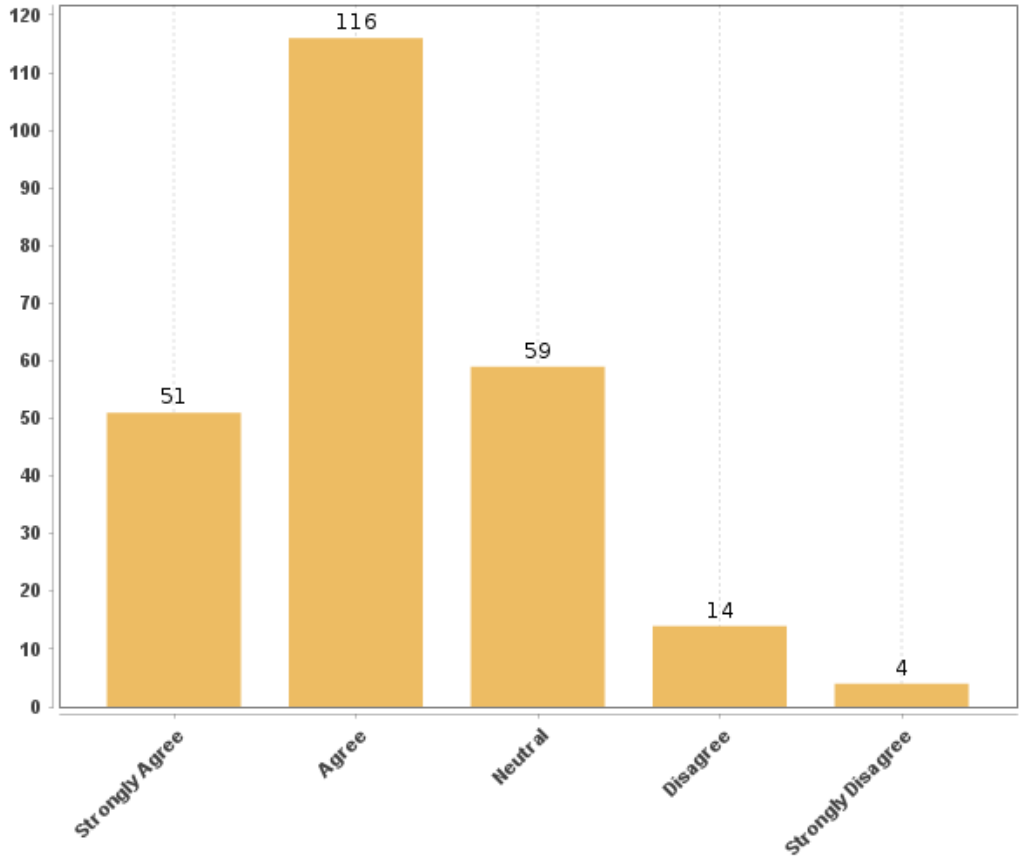
Location of employment development

Some people felt that employment sites outside of the city centre should be considered, with suggestions that sites outside the ring road should be prioritised and that new businesses should be incentivised to move out to the surrounding towns. There was also the suggestion that more could be done to encourage employment growth in Blackbird Leys. There were also comments that people should be able to work in the same area as they live.

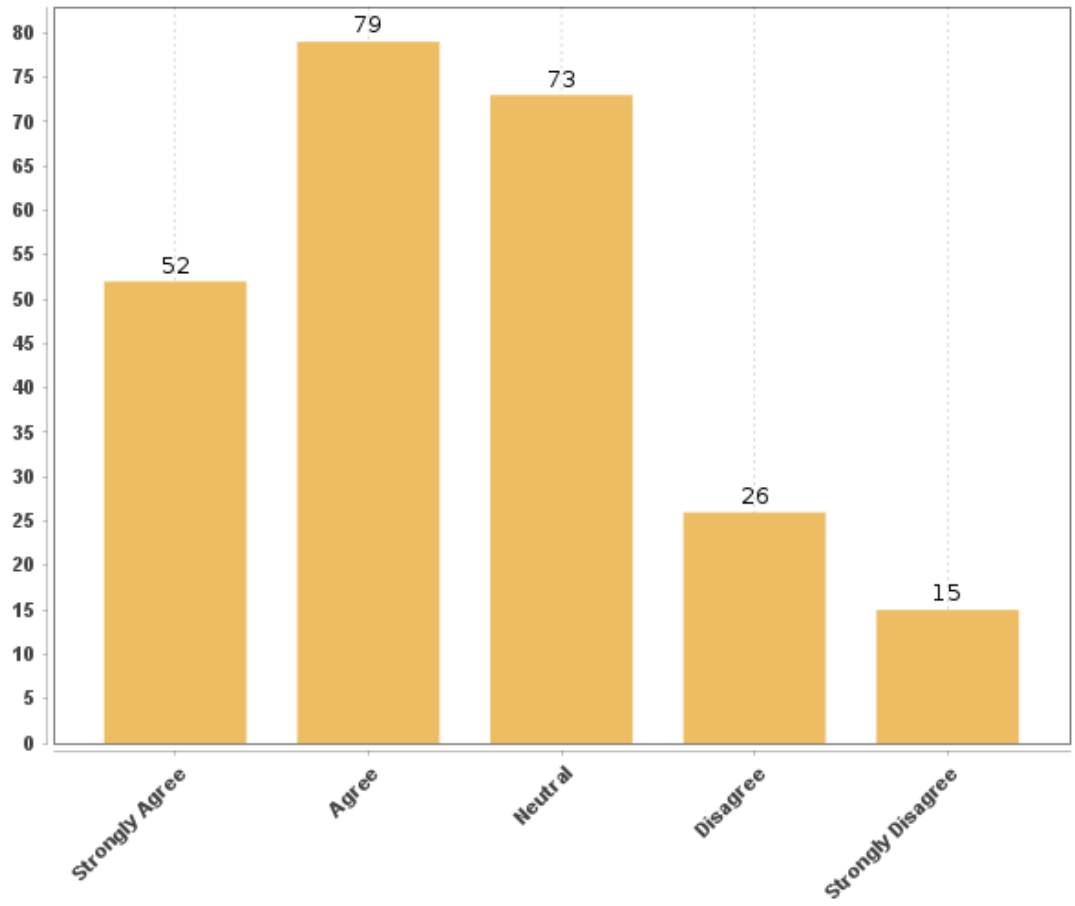
Some felt there was benefit of developing new employment sites close to residential areas for ease of access and others that businesses should not be located in residential areas but that out of town locations should be preferred.

Training and Skills

Graph of online questionnaire results: Land should be protected to provide new and expanded schools



Graph of online questionnaire results: Developers should be required to provide training for local people



A range of comments were received in relation to training and skills:

- Employers should be providing training and apprenticeships (9). Those that don't provide apprentices should cover training costs.
- There should be more engagement between local employers and students/people with no or low qualifications.
- Developers should provide apprenticeships or contribute financially.
- Training should be provided by the state/community, not the private sector. Partnerships between the local government and employers could deliver training.
- Oxford's state schools need more money and attention. They should be prioritised over private schools.
- More learning/training options should be available to those aged 13+ years who are not 'academic'.
- The scope for academies to support each other should be investigated.
- The universities could do more to support the training of local people, possibly in partnership with local government.
- Some minorities are overlooked, jobs should be available for immigrants and refugees.

Infrastructure

Many people felt that it was important for developers to contribute to the provision of infrastructure and that current infrastructure couldn't support growth but that the infrastructure needs to be in place to facilitate the growth. Schools and transport infrastructure (particularly improved provisions for buses) were highlighted as priorities.

Some suggestions in relation to schools included: build new schools rather than expanding existing schools; smaller schools are preferred; more schools are needed; grammar schools should be reintroduced; Brexit may affect demand for school places. It was suggested that land for new schools could be difficult to protect and that changes of use may help to provide more school places.

In terms of transport there were comments that transport to business parks is difficult, that quick access to employment areas by bicycle and public transport is required and that locating employment close to where people live reduces the need to travel. There were also a couple of comments that the hospital sites are over-expanding and swamping residential neighbourhoods and that this is particularly affecting Headington.

Retail

Many people commented that more independent businesses/shops would be beneficial (13). Some made a link that at least part of the problem is that there are few places for small businesses to trade affordably. (4) Others suggested lower business rates and rent would help (2) and that more needed to be done to protect small businesses (2)

General Comments

- Build on existing strengths (1)
- Diversify economic base (1)
- Help the North/South divide (1)
- Economy and jobs are really important (1)
- I think young people are hit the hardest of all and other people don't understand this (1)
- More social enterprises to help the disadvantaged (1)
- Developer demands do not always coincide with the needs of the population (1)
- If we lose Polish workers the building trade will suffer (1)
- More internet and live-broadcasts of city life (1)
- Stop pandering to developers (1)
- Research and see what other cities have done (1)

Summary of economy and skills comments received in emails and letters

Protecting employment sites for employment use

Consideration should be given to whether housing is better, or housing could be provided alongside employment.

Protection of employment sites needs to be selective and reviewed. The Council should consider more mixed-use developments. (Magdalen College)

Employment sites should be protected (where appropriately located) (Merton College)

Employment sites should be protected only with a proper review. (Oxford Civic Society) + (South Oxfordshire and Vale of White Horse District Councils)

Critically consider the extent to which some existing employment sites within the City could reasonably be put to an alternative use such as residential. (West Oxfordshire District Council)

Current sites that have few or poor quality jobs considered for large scale housing provision. (Sunningwell Parishioners Against Damage to the Environment)

Many large “protected” would benefit from a mixed development. (University of Oxford – Estates)

Live-work units and start-up hubs

Many businesses start at home. Enabling people to do this in a safe, constructive way would be beneficial. (Oxford Civic Society)

The infrastructure for start-ups is key (Solid State Logic)

Oxford’s strengths

The Local Plan should limit the education sector as a percentage of local employment in order to preserve diversity. Key to Oxford’s economic resilience is maintaining the diversity of its economic base. Oxpens has the potential to contribute by supplying much needed city centre employment space and of housing. The site will also deliver transport benefits in the form of the Becket Street extension. (Oxford West End Development Ltd)

The City Council should actively seek the use of Local Enterprise Zones, Simplified Planning Zones and Local Development Orders. (Thomas White Oxford Ltd)

Training for local people

Apprenticeships have an important role to play in addressing skills shortages. (Magdalen College)

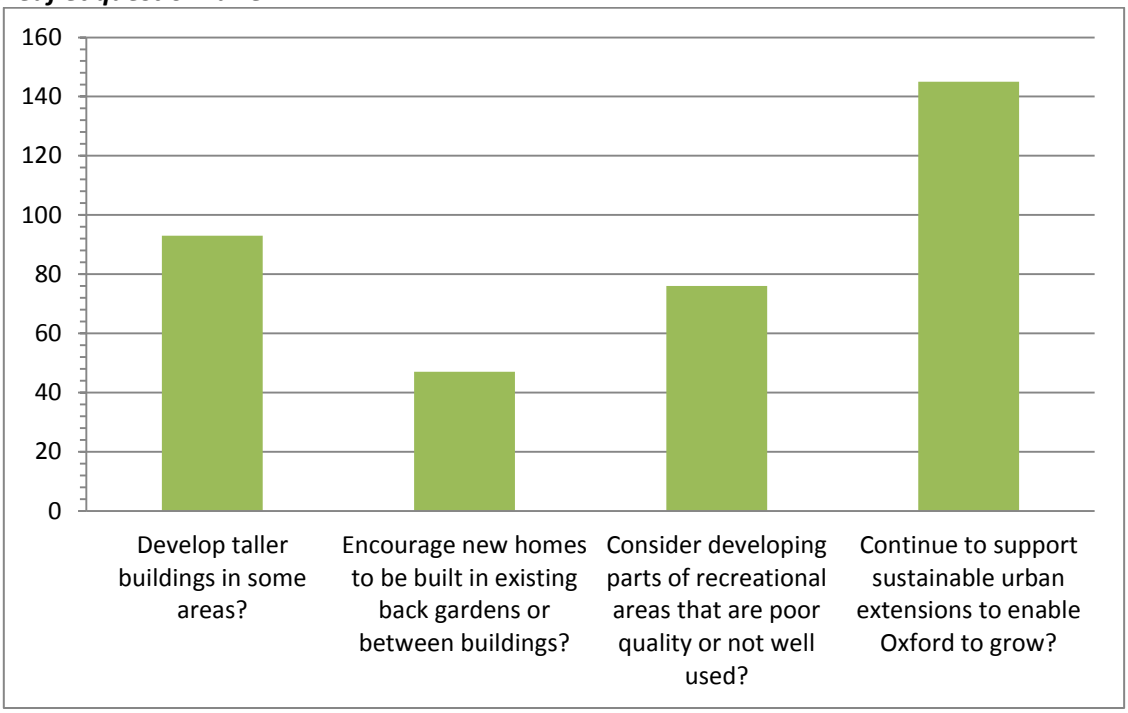
Developers should be required to provide training for local people. (Oxford Civic Society)

Developers should be required to prepare and implement a Community Employment Plan. (Oxfordshire County Council)

• THEME 3: WISE USE OF RESOURCES

The following graphs illustrate the numbers of people who agreed with the statements on the wise use of resources. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to the wise use of resources in the leaflet questionnaire



Population Growth

1 person questioned why the population has to increase, with 8 others suggesting that population growth should be restricted/stopped in order to reduce pressure on Oxford's resources. 1 person suggested that Oxford should campaign for managing the population to zero growth, both locally and globally, with another suggesting that Oxford's population should be reduced. It was also suggested that the way 'population' is defined should be more specific and take into account the proportion of students. 2 people commented that growth should be stimulated in the North of England, not in the South East.

Brownfield land & Infill Development

18 people wanted to focus development on brownfield sites. In particular mention was made of converting car parks to housing, redeveloping old industrial and commercial areas, developing on government buildings on Marston Road and replacing poorly maintained houses in Cowley with bigger residential buildings. One respondent suggested that the University should support the redevelopment of brownfield sites. Another that more efficient use should be made of existing housing stock including conversion of large houses (e.g. Woodstock Road) to HMOs, ensuring that people in social housing are not subletting properties, bringing empty homes back into use and upgrading older housing.

Views were split on infill development with some respondents supporting it and others against it. Some felt that there was already too much infill development in Oxford and that it increases congestion. Others commented that infill development needs to be carefully managed.

7 respondents saw the value of gardens and were keen not to see development of garden land. The reasons were varied including the feeling that green spaces are part of Oxford's character, it would lead to overcrowding, gardens provide habits supporting biodiversity, gardens help to protect air quality and improve the local environment. However there were some respondents in favour of building on garden land.

Density and Height

5 respondents supported building higher and 6 felt that building higher was preferable to building on greenfield sites. Some respondents felt that some tall buildings would be appropriate but not all buildings to be tall and that tall buildings must be of high quality design. 3 respondents felt that the height of development should be limited to 5 storeys maximum; another to 3-4 storeys maximum and another that height should match surrounding buildings. 13 people felt that tall buildings are not appropriate in Oxford at all. 1 person commented that tall buildings located outside of the city centre would be acceptable and another suggested that tall buildings might be acceptable in the less sensitive parts of the city. 4 people commented that tall blocks of flats do not provide good living environments and/or are associated with social problems.

8 people commented that Oxford's skyline should be preserved and 4 commented that views should be preserved.

5 people supported increasing densities within the city, with 1 person commenting that densities should be higher in areas with good transport links and another suggesting that high density development should be located close to employment/educational uses, therefore reducing the need to travel. 1 person suggested that new homes could be built around Transport Way and Watlington Road. 3 people commented that it is important that any new homes have access to green spaces and community facilities.

1 person commented that it is important that any development near Oxford's historic core must be of a high design quality, whilst another person commented that all new developments should be sensitive and in-keeping with established architecture.

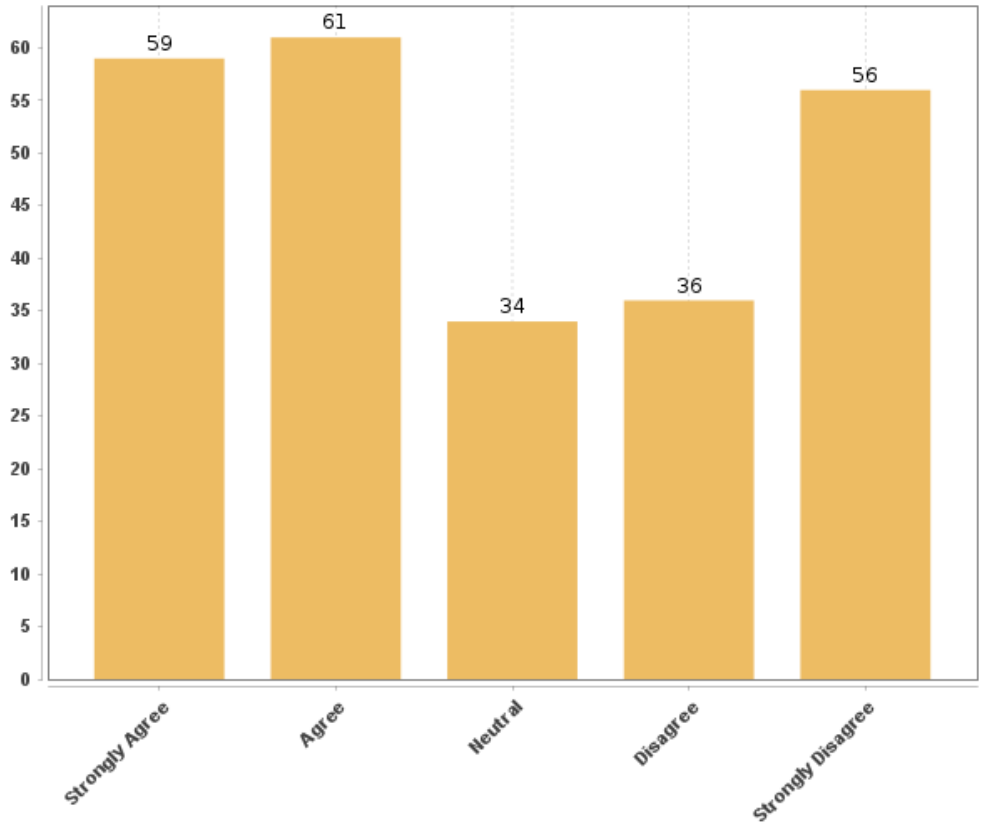
3 people suggested that the focus should be on building flats rather than houses to achieve higher densities. 1 person suggested that we should be building small units for single people. It was also suggested that the university should develop homes for its own workers and that there are too many houses to rent in the city. 1 person suggested that it should be made easier for people to share housing. It was also suggested that less space should be given to cars (both roads and parking).

6 people felt that high density developments should not be encouraged because they are not in keeping with the character of the city, 5 because it will increase congestion and parking problems and 2 because it could result in increasing levels of antisocial behaviour.

Some people felt that decisions on height and density should be made on a case by case basis. Comments were received asking the City Council to think beyond the short term, to consider the type of environment that people want to live in, to research approaches taken in other cities, and to consider more innovative/sustainable solutions.

Reviewing the Green Belt/possible urban extensions

Graph of online questionnaire results: Urban extensions close to Oxford (on the Green Belt) would help meet future housing needs



19 people stated that they did not think that there should be any development on Green Belt land. The reasons given for this were:

- Oxford doesn't need to grow/is already too big/the city form is complete/Oxford should shrink, not grow (6)
- Green Belt should be protected/the Green Belt is what makes Oxfordshire great (11)
- Continuous growth is not sustainable/urban extensions are not sustainable (4)
- Increased pressure on natural resources/biodiversity (2)

18 people supported the idea of a Green Belt review with the possibility of urban extensions. The reasons given for this were:

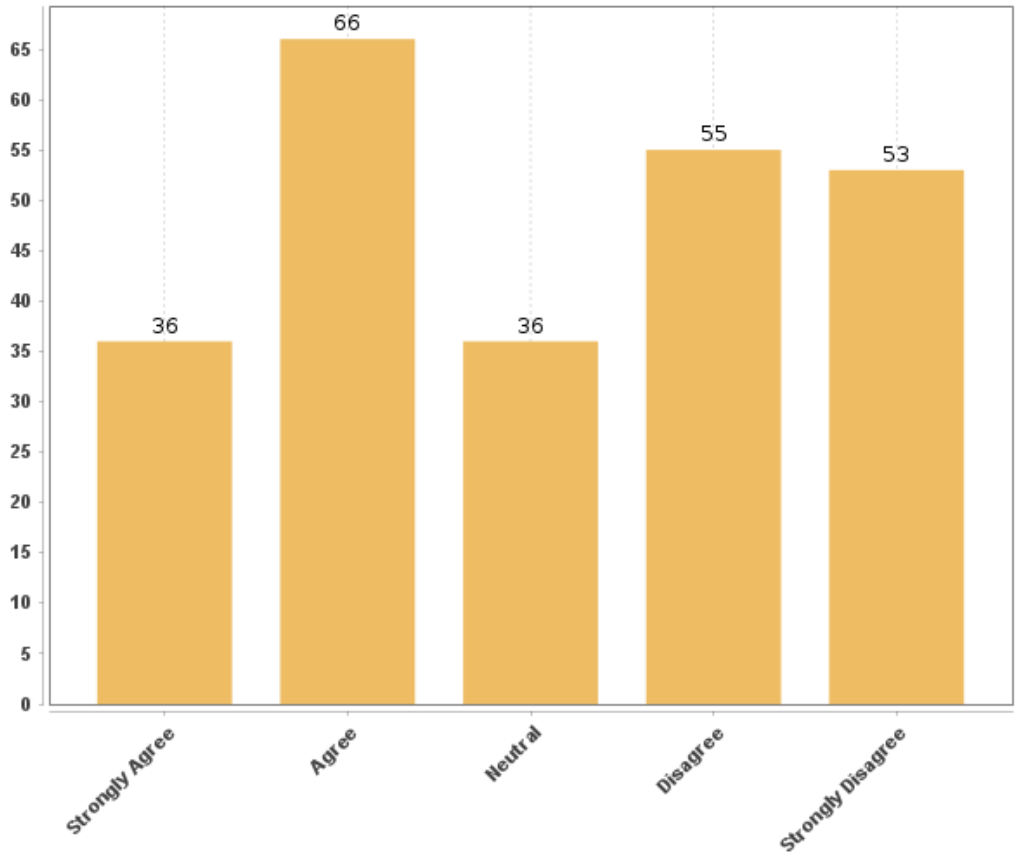
- this is better than over-developing existing sites in the city (3)
- it would allow green spaces within the city to be retained (1)
- that it would improve the quality of life in the city (2)
- Green Belt is not useful to Oxford (1)

Some people gave specific examples of when they felt an urban extension might be appropriate: only where there are good transport links (6); only if environmental compensation/gains can be made (2); only for key worker housing (1); only for social housing (1); and only where sprawl is not a problem (1). 1 person commented that it was difficult to comment on this without any specific proposals. Another person commented that a Green Belt review should be done jointly with neighbouring authorities in Oxfordshire to have a strategic approach rather than piecemeal development.

Some people suggested that development should take place elsewhere: build outside of Oxford (4); planned growth of surrounding towns and villages (4). It was also suggested that this should be supported by improved transport links between Oxford and surrounding settlements (1).

Building on green spaces

Graph of online questionnaire results: Some poor quality/under-used recreational areas could be partly developed for housing



Many people (60) wrote comments disagreeing that some poor quality/under-used green spaces could be partly developed for housing. The reasons given for this were:

- Under-used/poor quality recreational areas should be improved and brought back into use rather than developed (30)
- Development/population growth will increase demand for recreational spaces (7)
- Recreational areas are needed to support healthy lifestyles/quality of life (3)
- Any loss of green space is unacceptable/All of Oxford's green space is needed (3)
- It is important that Oxford remains a green city for future generations (1)
- Developing green spaces is a 'slippery slope' (1)
- Access to recreational spaces should not be limited (1)
- Without recreational areas there will just be sprawl (1)

1 person commented that how poor quality/under-used green spaces are defined is a very sensitive issue and community consultation is vital. 6 people said that the golf course should be developed for housing. It was suggested that the golf course is under used (2) and that this would reduce need to build on Green Belt land (2). 4 people felt that it may be appropriate to build on some poor quality/under-used green spaces.

Allotments

2 people commented that allotments should be protected. It was suggested that incentives should be used to increase the use of allotments, including potential use by schools (1). It was also suggested that allotment land should only be used where there is local agreement (1).

Flood Risk

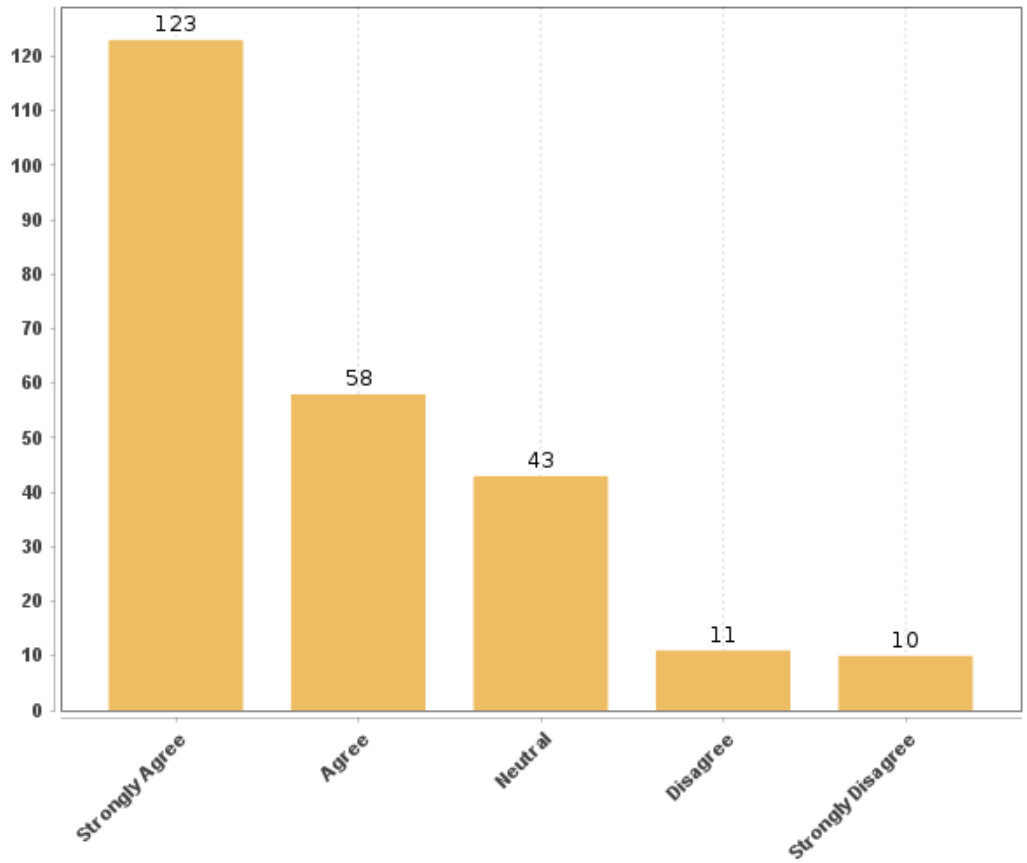
Don't build on flood plain (2) / consider how development of green spaces will affect flood risk (1) Improve flood management so homes can be built on the flood plain (1) Consider building homes on stilts or helical piles (1).

Sustainable Buildings

2 people said that new buildings should be required to comply with eco-guidelines, with another person suggesting buildings should be zero carbon where possible. It was also suggested that carbon emissions from dwellings should be reduced by a 'fabric first' approach and that housing should have better insulation (2). 1 person suggested that all new developments should include systems to reduce or slow rain water runoff. Another person suggested that the council should provide subsidies to renovate old houses and make them more energy efficient.

Renewable Energy

Graph of online questionnaire results: New developments should be required to include on-site renewable energy generation



A range of comments were received in relation to onsite renewable energy generation:

- New buildings should have solar panels (3)
- Innovative heating solutions should be considered (1)

- Onsite renewable energy generation should be maximised to meet all of a development's energy needs (1)
- Non-residential buildings should be refurbished to include renewable energy generation (1)
- Community-level renewable energy generation works well (1)

Other people raised concerns about onsite renewable energy generation:
- Whilst onsite renewable energy generation is desirable, the focus should be on energy efficiency (1)
- It must be shown to work, not tokenism (1)
- Piecemeal onsite renewable energy generation is inefficient. The focus should be on large scale projects (1)
- Renewable energy is often ineffective and damages the environment (1)
- Unfloor heating in ineffective and expensive to repair (1)

Summary of wise use of resources comments received in emails and letters

Underused/efficient use of land

Would support a review of how land could be better utilised for both recreational and development purposes. (Oxford Brookes University)

The city council should explore all options for increasing housing supply within the city, including building:
- on previously developed land wherever possible;
- on greenfield sites, particularly under-used and/or poor quality recreational land;
- on existing residential back gardens;
- in-between existing buildings;
- at higher density; and
- taller buildings (Oxfordshire County Council)

References to re-use of previously developed land, considering Green Belt sites and higher density development are supported (Cherwell)

Support the proposals to use poor quality or under-used recreational areas for housing

Priority should therefore be given to allocating under-used open spaces outside the flood plain for development (Magdalen College)

Support for urban extensions close to Oxford/Green Belt review

It would be sensible re-designate some green belt land close to the city for housing (Solid State Logic)

Chiltern Railways believe there is a case for partial review of Green Belt in the Kidlington area (Chiltern Railways)

Consider that exceptional circumstances exist to justify the sites release from the Green Belt. The Council should support an urban extension. (Magdalen College) + (Merton College) + (Oxford Civic Society)
The city council should also consider removing land from the Green Belt within the city and allocating it for housing, although any sites considered must be aligned with sustainable transport routes. (Oxfordshire County Council)

Ruskin Fields could both help to meet the pressing need for more housing land in Oxford and also support Ruskin College's educational activities. (Ruskin College)

The SOGN has the potential to create a sustainable new community on the edge of Oxford, which is supported on the grounds that: a review of the Green Belt is justified; in the most sustainable manner; and development of the site will not compromise the purposes of the Green Belt. (Savills – on behalf of the land owners)

The City should undertake its own Green Belt review (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges) + (City's Major Bus Operators) + (University of Oxford – Estates)

Good locations for urban extensions would include Wick Farm and St Frideswide Farm (on the boundary with Cherwell District)

Negative implications of urban extensions

Traffic mitigation measures would be required.

There will be large increases in traffic through south east Oxford's restricted road space.

Focus further growth in areas such as Bicester. Urban extensions close to Oxford, in the Green Belt, would be an unacceptable way to help meeting housing needs. (CPRE)

Urban extensions would be damaging to the character and heritage of the city (Oxford Green Belt Network)

Development to the edge of the city alone, without delivery of sustainable transport infrastructure would not be acceptable. (Oxfordshire County Council)

Local opinion is against urban extensions and to building on the Green Belt. (Wolvercote Neighbourhood Forum)

Land at Thornhill on Shotover Estate, is within South Oxfordshire District. (Trustees of Shotover Estate)

Energy efficiency and renewable energy policies

The Council's requirements for renewable energy go well beyond Part L of Building Regulations. This imposes additional cost on developers and therefore occupiers. CO2 emissions are better addressed by encouraging energy efficiency. (Magdalen College)

The local plan should require new development to ensure City Council waste and recycling collection systems can be accommodated. (Oxfordshire County Council)

Developments should be required to make an appropriate contribution to the overall energy efficiency of the City by mitigating their own impact. (University of Oxford – Estates)

Planning policies should be amended to shift the focus to energy efficiency.

Energy consumption-reduction measures, water consumption-reduction and management measures, and properly-considered waste management facilities should also be required with on-site renewable energy generation. (Oxford Civic Society)

Greater attention should be placed on green and eco credentials of new built forms. (Sunningwell Parishioners Against Damage to the Environment)

Any new policy requirement must:

- Be clear in the regulated and un-regulated loads it is assessed against and take adequate account of the viability of complying for certain high-unregulated load facilities such as those with data or medical uses;
- Be clear in the base-case any percentage requirement is assessed against;
- Have greater nuance to ensure the requirement is appropriate to the size of development;
- Take account of the energy hierarchy;
- Enable a strategic approach that enables an aggregated installations across multiple developments and supports initiatives such as City wide district heating schemes;
- Take account of the constraints of the City for renewables;
- Provide for post construction monitoring.

(University of Oxford – Estates)

Other comments

We are pleased to see an emphasis on locating development in sustainable locations in transportation terms. (Chiltern Railways)

Recommend a mini Integrated Water Management Strategy to be produced to support the promotion of a new settlement or an urban extension. Recommend a policy requiring new dwellings to meet a water efficiency requirement. Include a policy which specifically addresses the need for all development to incorporate SUDs within all proposed development. (Thames Water)

The Local Plan should ensure that existing commitments and new allocations come forward in a timely manner in order to ease the pressure on the local housing market, Local Plan policies will need to seriously consider alternative means of increasing the supply of housing without increasing land take. Potential options are:-

- increasing the densities
- taller buildings (Thomas White Oxford Ltd)

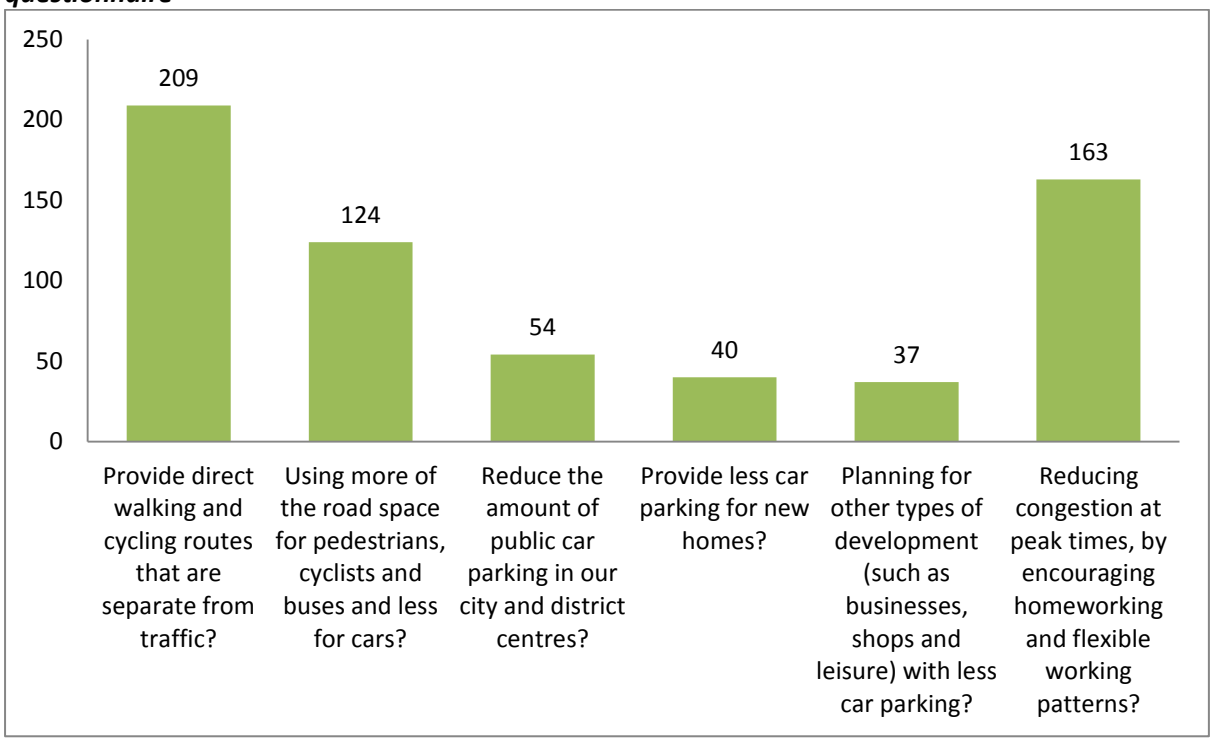
Any proposed housing development on the ridge or on the slopes facing into the city would be likely to detract from the setting and character. (Historic England)

Any green spaces requiring 'improvement' should be 'improved' without the need to sacrifice other green space.

• THEME 4: MOVING AROUND THE CITY

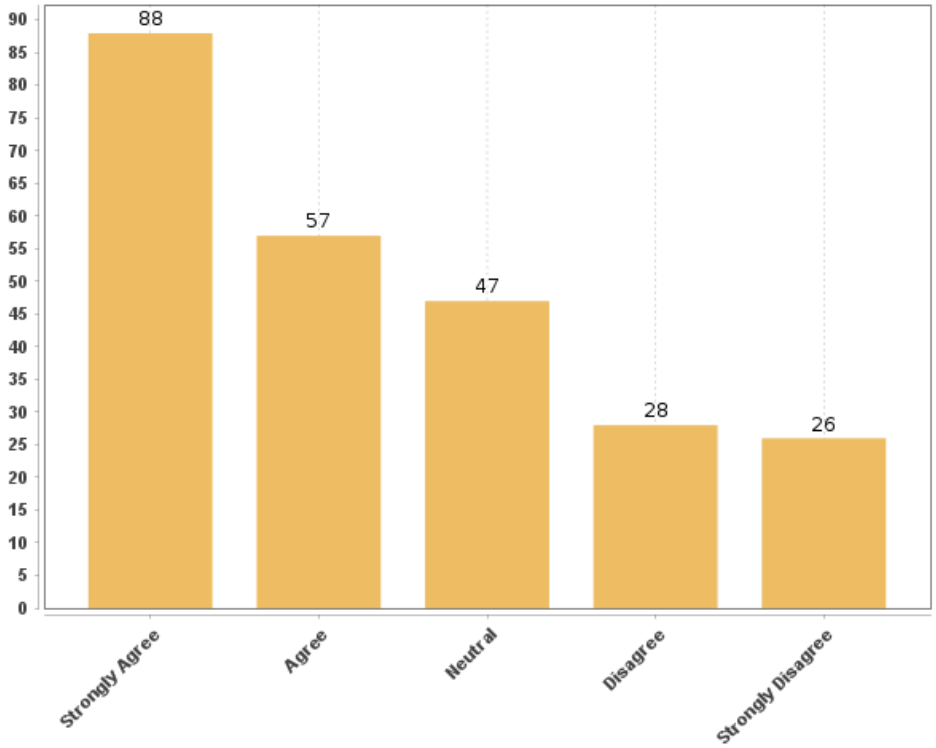
The following graphs illustrate the numbers of people who agreed with the statements on moving around the city. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to transport in the leaflet questionnaire



One-way radials

Graph of online questionnaire results: Road space should be reallocated from cars to buses, for example through the introduction of a one-way system for cars on Woodstock and Banbury Roads



Comments made include:

- Radials that are one-way would increase the already terrible congestion
- One-way systems could be widely introduced - eg on Divinity and Southfield Roads
- The question with potential one-way radials would be how to safeguard for accidents (dangerous for pedestrians and cyclists/congestion/alternative routes (11)
- Agree with Woodstock and Banbury Rds being one-way for all vehicles except buses
- More journeys should go around the edge of oxford, rather than using radials and travelling through the centre.

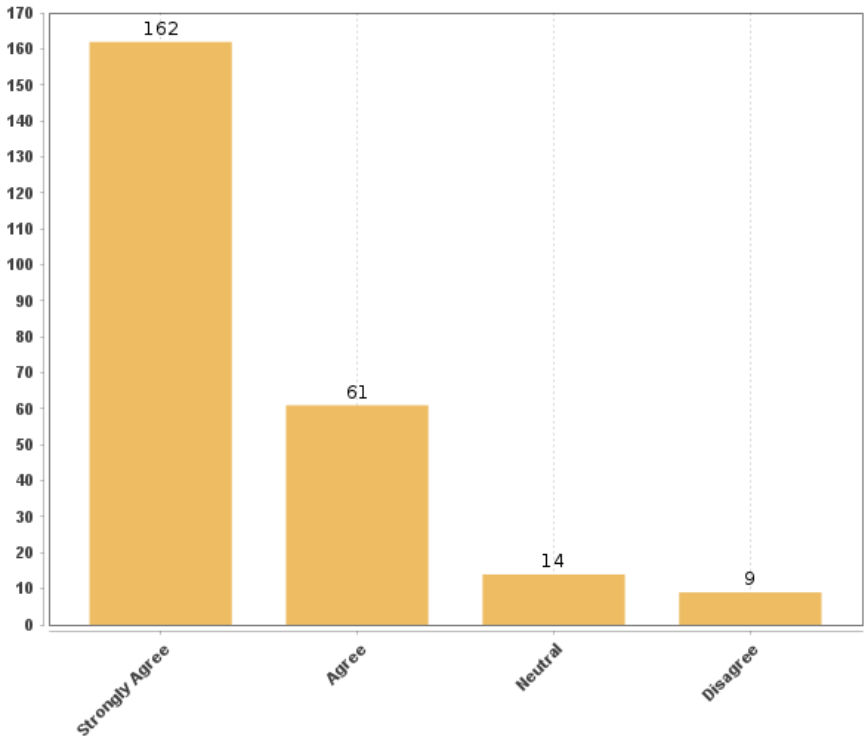
Car use/ priority

1 respondent said we must reduce car use in all possible ways, another said car owners should be penalised and another said we should restrict car ownership per home. However, 23 respondents said that it is important to recognise that some people will need to drive or want to drive. Other means of transport can be encouraged, but car driving should not be penalised. That would be bad for businesses. Some respondents pointed out that the city is for people and people use cars, that some people would have a much longer commute without using their car, that motorists aren't a 'cash cow' 'and cycling provision doesn't improve by 'taxing' motorists. Restricting the car disproportionally affects groups such as the elderly and disabled. Public transport links aren't good enough that the car isn't needed. Several respondents said the City Council seems to be anti-car.

8 respondents said that there are too many cars or car traffic/combustion engines should be reduced or eradicated in the city or city centre. A few said that should also apply to buses, and achieved with improvements to walking and cycling. Others said that improvements to buses were needed in order to reduce cars, eg free or cheaper buses.

Segregated traffic and cycle lanes

Graph of online questionnaire results: Walking and cycling routes separated from traffic should be provided



Many respondents (25) commented to say cycling and walking should be safe and segregated from each other and all other types of traffic for a range of reasons:

- Cycling and walking don't mix well (bikes are dangerous for pedestrians). Pavements must be safe. Plenty of space is needed for each.
- Cycles and buses don't mix well.
- Cycle lanes should be clearly visible from roads but on the road
- Space for cyclists should be taken from motorists not pedestrians
- Cycle lanes for commuters, running from and across the city centre to Kidlington, Parkway Station, along Eynsham Road etc, and around the edge of Oxford should be considered
- Cycle routes should be continuous, safe and joined up- there is a lack of practical lanes currently and nothing seems to get done to improve this

One respondent said there is no point having cycle paths as cyclists don't use them, another said cyclists should be obliged to use cycle lane, 1 said there should be more signage banning cycling on pavements and 1 said mixed roads work best.

Provision for pedestrians and cyclists

The Plan should promote activity, such as walking and cycling (3).

- Many respondents were keen to see cycling provision improved:
    - Cycling provision is poor and needs to be much safer, especially so it is accessible for all (across Oxford, or specific area-Headley Way, Iffley Road, Cowley Road, bottom of George Street, Windmill Roadbikeway along Frieze Way to link A44 to new Oxford Parkway station)(22)
    - Oxford does not have high levels of cycling as the Council thinks- levels are low (1)
    - cycling should be the priority (1)
    - There should be cycle tracks away from cars to towns and villages outside Oxford to enable access into Oxford (1)
    - although there are limits to cycling, for example up Headington Hill (1)
    - More advertising/expansion of bike share scheme (2)

Roads should be safer for all, especially pedestrians (3) eg pedestrian crossings, zebra crossings, ramps at crossings, wider pavements.

- 5 respondents suggested pedestrianisation
    - of central areas (2)
    - Hythe Bridge Street (1)
    - Broad Street (2)
    - Queen Street (1)
    - Cowley Road (1)

Enhance/consider access for disabled (6). Those with disabilities should be considered when designing pedestrian and cycle routes (1). The increase in use of pavement mobility scooters, increased size of push chairs, larger wheelchairs must be considered (1)
More bike parking is needed in the town centre (1)

Public transport improvements

12 people commented to say that public transport should be improved to encourage and serve more people, to get people out of cars and as its better for the environment), and commented on ways in which that could be done:

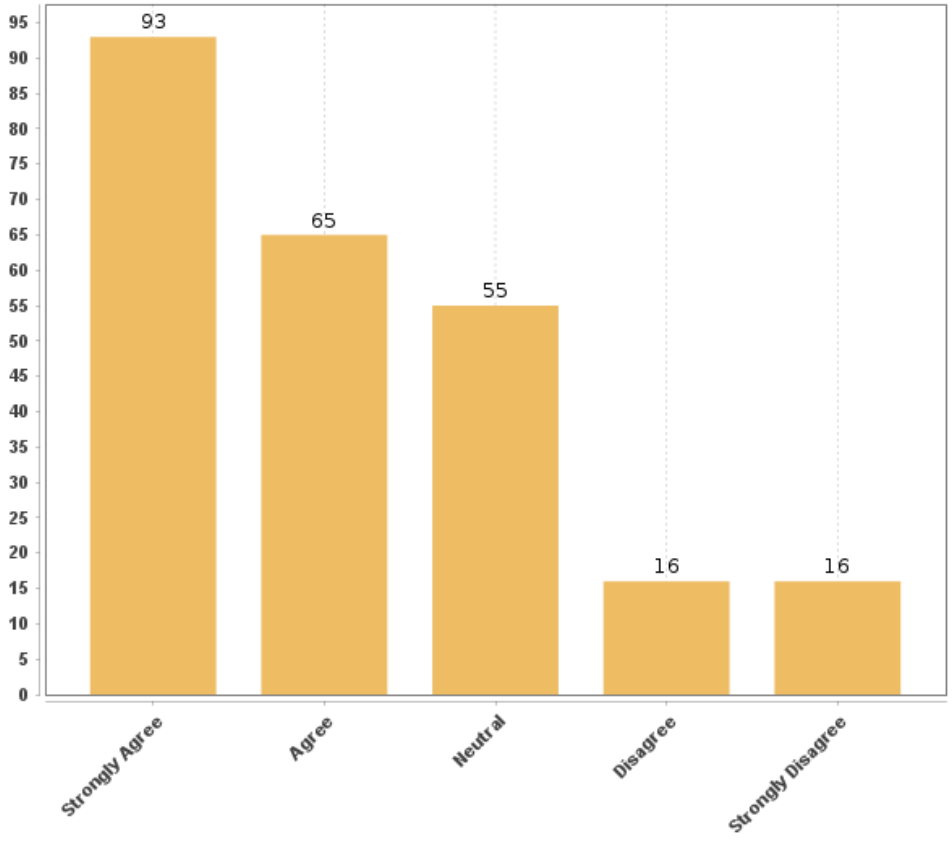
- bus prices must be cheaper/subsidised/cheaper than the car/taxis/free at point of use (15)
- buses should be more reliable and frequent /comfortable/fast/flexible (7)
- introduce small, light buses that run frequently without pollution, in place of big buses (3)

- there should be better routes around the ring road to avoid journeys to the city centre/improved services to parts of the city other than the centre and from outside the city (strengthen Oxford, Abingdon, Didcot route) (8) and also better connections between different parts of the city (1)
- bus lanes are needed (1)
- reduce buses going through the centre so they can keep to timetable (1)
- spaces between bus stops is too far (1)
- buses can be very slow because of long queues of people (1)
- look at potential for tram networks (6) to neighbouring feeder towns- Witney/Abingdon etc (2)
- keep long-distance buses out of the city centre (Tubes and airport buses) and people can travel to them on local buses provided (3)
- make far more use of rail and other urban transport (not only buses)

Several people had suggestions for improving Park and Ride facilities: encourage use by introducing a single fee for parking and bus (1) or don't charge people for using park and ride (1). Prices force many to live miles away and they have to drive. Decent accessible park and ride (more sites) is needed with frequent services (5).

Air quality/congestion charge/Low emission zone

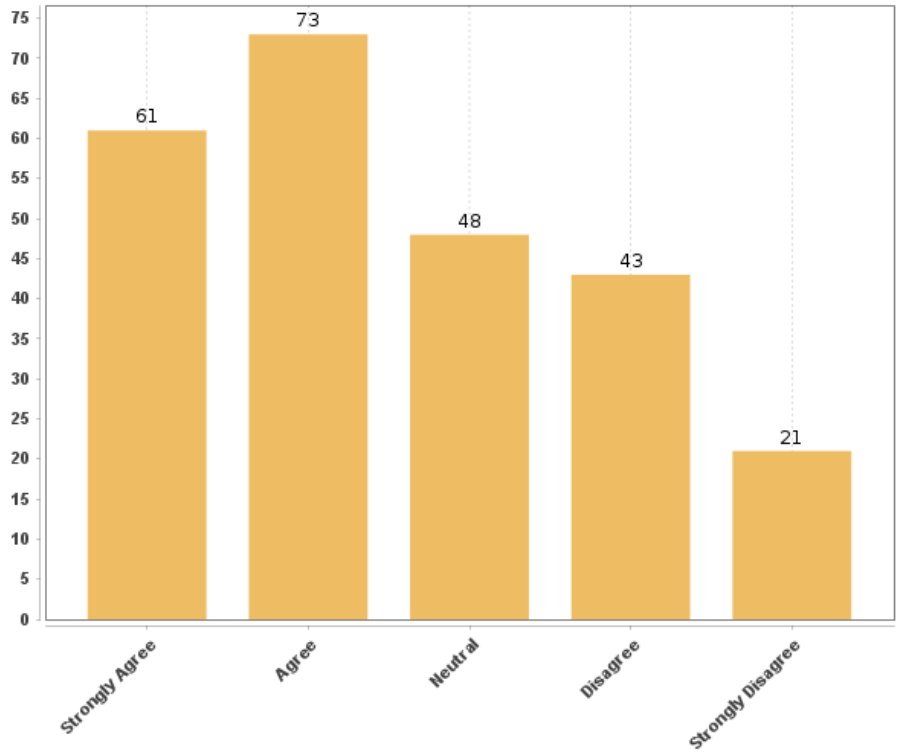
Graph of online questionnaire results: More restrictive emissions zones should be introduced



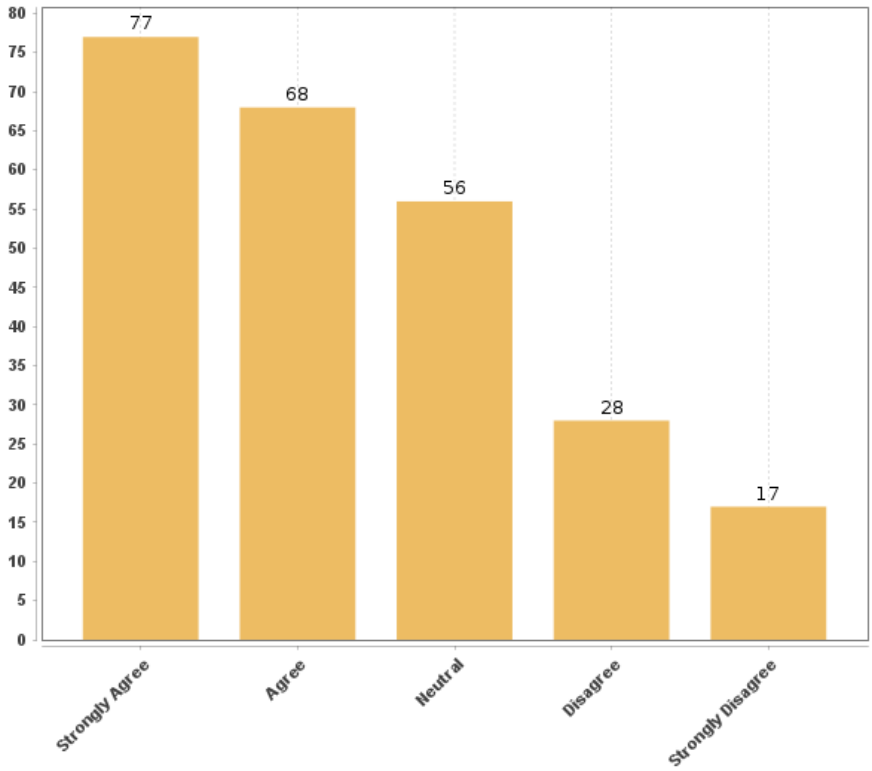
1 respondent commented to say that pollution from diesel vehicles is too high and is off-putting for cyclists. 13 said that poor air quality must be addressed urgently and 7 said there should be a congestion charge. 1 said that the emission zone does not help and another said it should be applied to all traffic. Others suggested that rather than restricting emissions, there should be incentives for electric car adoption and more electric charging points (2).

Parking

Graph of online questionnaire results: Numbers of parking should be limited for residential developments



Graph of online questionnaire results: Numbers of parking spaces should be limited for workplaces



Need for parking

Several respondents commented that people will always have cars and therefore need to be able to park them at home – unrealistic to think otherwise/will lead to parking problems (11). Residents are not the cause of the congestion and many need cars such as midwives, tradesmen, disabled/elderly (2), many who don't have time to park and ride but need to work eg part-time workers (1), families (1). Why stop people having cars? Homes need parking incorporated at the planning stage (1) visitors will need parking spaces also. More bike parking (5) more disabled parking (1) is needed. More parking around hospitals, the new multi-storey at JR should have been an underground car park (2).

Need parking to support shops and leisure (10). Reducing parking in the city will only encourage drivers to go elsewhere to shop, as many already do, or use out of town (4) not good for commerce in centre (11). Centre shops aimed at tourists not in cars (1). Lack of affordable parking is strangling local centres (1) or would be detrimental (1). There should be cheap/free parking available for cars as buses are very expensive/it would support shops (4). More park and rides may be the solution. Reducing car parking does not necessarily reduce car use. Flats without parking normally have to introduce some after a year or two (1). Not sure if more flexible working/home working would reduce congestion (1). More creative ways of adding parking should be considered- building down, over or up (2) could have multi-storey residents' parking close to homes (1)

Limit/disincentivise parking

We must reduce car use in all possible ways (1). Charges for workplace parking (3); levy should go to public transport (1) and public parking (1). Restrict workplace parking spaces (1). Charge colleges and private schools for parking (1) Reduce parking for commuters (not for shoppers). People need to learn there is no human right to parking (1). Would like to see fewer cars and less car parking in Oxford (1). Students should not be allowed to bring cars. Could limit in housing for singletons etc

(not families) (1). Less residential parking should be available if located on a bus route. Try to encourage young and able bodied to walk/use public transport to centre and only provide parking for disabled people.

Limit parking spaces- parking numbers should be limited for all developments (1). Parking limited for HMOs. Permits across the city would help with this (2). Maximum of two permits per address (1) Stricter enforcement of parking restrictions (2)

Locating new developments

6 respondents noted the link between the location of developments and transport choices, saying that good transport will be needed if new residential areas are outside Oxford, that small local shops people can walk to should be encouraged, that park and ride locations would be good for new developments, that new affordable housing should be near workplaces, that the imbalance between people living and working here should be reduced and that Northern Gateway is not a good location for development. No job creation until traffic reduced to 1975 levels. Where small villages are losing shops and services no choice is left but to use cars.

Technology/new ideas

Electric cars and buses and e-bikes (6) including self-driving (1) micro-buses/smaller buses that don't destroy roads (11) car-clubs/car sharing (5), including the idea of 'state-owned' schemes with electric, autonomous vehicles. A long-term place to replace all motor traffic with self-driving taxis should be considered.

Other suggestions include: Car clubs (1), more types of public transport- tram, mono-rail, subways, Cycle taxis (quicker and cheaper than buses), Congestion charge (3)

Other transport comments

- Air quality is very poor in the centre
- Traffic congestion is the biggest blight in Oxford
- Encourage County Council not to do everything at the same time
- Build a road from the JR to ring road- Headington feels as if it is bursting with traffic
- Planning conditions should make flexible working mandatory. Employers being more flexible could be helpful in promoting walking and cycling
- Fix the pavement and road potholes
- Bike crime is out of control
- Open all parks for cycling
- The parking on Broad Street should be removed to make community space
- Encourage car sharing
- Better education and teaching for cyclists and law enforcement (3)
- The scale of Westgate is inappropriate
- The aim of every road 'improvement' scheme has been to speed traffic flow

Summary of moving around the city comments in letters and emails

Problems with transport/importance of improved sustainable transport

Congestion

Would be concerned if any material increase in traffic were to occur on the A34. Development cannot progress without the appropriate infrastructure in place. (Highways England)

Merton College controls land on which the Strategic Link Road may be located and would be pleased to engage in proposals to relieve congestion. Also controls land on strategic routes which may be suitable for park and ride to alleviate congestion. (Merton College)

Need improved investment in sustainable transport to minimise congestion and enable university functions to take place. (Oxford Brookes University)

Congestion charging in the centre. (Solid State Logic)

There is considerable traffic from the Wolvercote and Cutteslowe roundabouts, more dedicated direct buses from park and rides during rush hour could to help. (Wolvercote Neighbourhood Forum)

Air quality

We must recognise that buses create a pollution problem.

Air pollution needs to be minimised to encourage cycling.

The plan should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. (Natural England)

Further solutions to reduce air pollution could be through the implementation of a city centre Zero Emission Zone. (Oxfordshire County Council)

Greatest short-term improvements in air quality are achievable through addressing tailpipe emissions from other sources. (City's Major Bus Operators)
More restrictive emissions zones should be introduced progressively (Oxford Civic Society)+(Oxford Friends of the Earth)+(University of Oxford – Estates)

Reducing car journeys/travel

The Local Plan should include policy that:

- Affirms how development will support access by walking, cycling and public transport, and is accessible for all.
- Include guidance on the need and scope of Transport Assessments and Travel Plans for developments
- Safeguard land for transport infrastructure.
- Ensure major developments on the edge of the city and in the urban extensions are supported by high quality public transport and cycle infrastructure. (Oxfordshire County Council)

"New development should be delivered in locations close to established sustainable transport networks" is too restrictive. (South Oxfordshire and Vale of White Horse District Councils)

Employment developments should be mixed with the intention that the employment and housing is co-located as far as is possible. (Sunningwell Parishioners Against Damage to the Environment)

Workplace parking

Car park spaces should be subject to Workplace Parking Levy. Cycle-parking spaces should be substantially increased and to higher standard. Schools need high-quality convenient access by cycle and ample cycle parking. (Oxford Civic Society)

Restricting free parking spaces should reduce congestion. This should be done through a strict allocation of number of spaces rather than charging employers. (Oxford Friends of the Earth)

Limited workplace parking with high licence fees. (Solid State Logic)

Consider permit parking at employment sites only to accommodate car-sharing. Strongly support workplace parking levy in city centre. (City's Major Bus Operators)

Welcome restricting car usage through traffic control measures and a form of demand management, which could include limiting working parking. (University of Oxford – Estates)

Residential parking

Car park spaces should be limited or removed entirely.

Ample cycle parking must be a requirement of all new developments, to a higher standard than at present. (Oxford Civic Society)

Limiting the number of parking spaces in new housing developments needs to be done in conjunction with the availability alternative modes of transport. (Oxford Friends of the Earth)

Consider dedicated parking provision for car clubs to be made throughout residents' Controlled Parking Zones, as well as in new developments. (City's Major Bus Operators)

Must be opportunities for walking and cycling from housing that is near the city.

General parking

Innovative means of providing parking alongside new development should be considered (Cherwell)

The Local Plan should include new parking standards. A more fundamental review of parking standards should be considered (Oxfordshire County Council)

"Zero parking" developments are justifiable especially in high-density mixed use hubs. (City's Major Bus Operators)

Support development which promotes low or no car parking. (Oxfordshire County Council)

Road space allocation/reallocation

There will be limited opportunities in Oxford to separate traffic types, introducing trams on major arteries could be cost effective particularly as a significant investment in improving these roads is needed. (Ox Friends of the Earth)

Free parking at the Park & Rides paid for by a congestion charge. (Solid State Logic)

Significantly improved bus journey times should be an aim (City's Major Bus Operators)

A one-way system for the Woodstock and Banbury Roads would be extremely unpopular. (Wolvercote Neighbourhood Forum)

Lye Valley (road) as a Home Zone and consider other areas too (1)

Walking and cycling

Wish to see the Local Plan create a comprehensive network of cycle routes. Paths and cycle-ways should be separated from traffic.

Walking and cycle routes and facilities for sport, recreation and leisure should be created, linked up, signed and maintained properly. (Oxford Civic Society)

The Local Plan should include policy that:

- outlines how development will support access by walking, cycling and public transport.
- Includes design standards for pedestrian and cycle infrastructure
- Safeguard land for transport infrastructure, particularly public transport, walking and cycling. (Oxfordshire County Council)

Much better provision of cycle routes. (Solid State Logic)

Walking and cycling routes separated from traffic should be provided. (Oxford Friends of the Earth) + (University of Oxford – Estates)

Rail

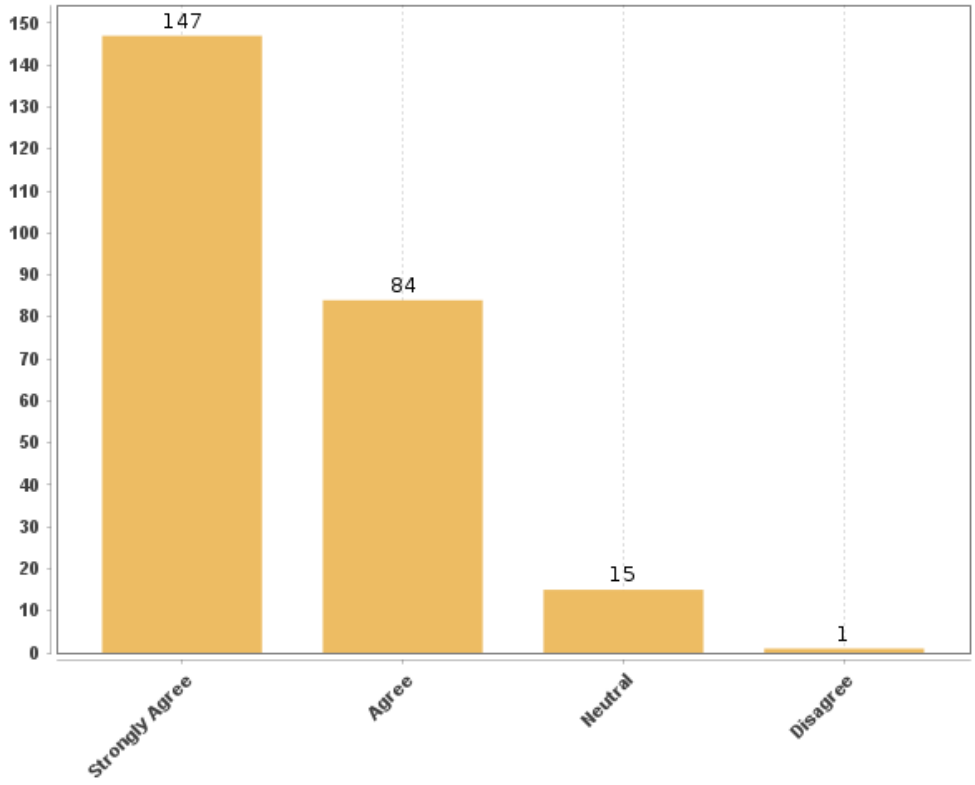
The Local Plan should identify the Cowley Branch as a key transport project. The service specification and capacity provision should come first, then station design. (Chiltern Railways) + (Magdalen College)

• THEME 5: STRONG COMMUNITIES, HEALTH AND WELLBEING

The following graphs illustrate the numbers of people who agreed with the statements on strong communities, health and wellbeing. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Active travel

Graph of online questionnaire results: Walking and cycling routes and facilities for sport, recreation and leisure should be made available to help physical and mental wellbeing



1 person commented that active travel should be encouraged, as it reduces carbon emissions, air pollution, and improves health. Another commented that use of public transport should also be encouraged (especially for older people) to stay healthy.

1 person felt that adequate walking & cycling routes are already available in Oxford, whilst another felt that transport into the city by bus and park and ride could be improved. It was also suggested that the needs of older and vulnerable people, who cannot cycle and have limited walking capacity, need to be considered (1).

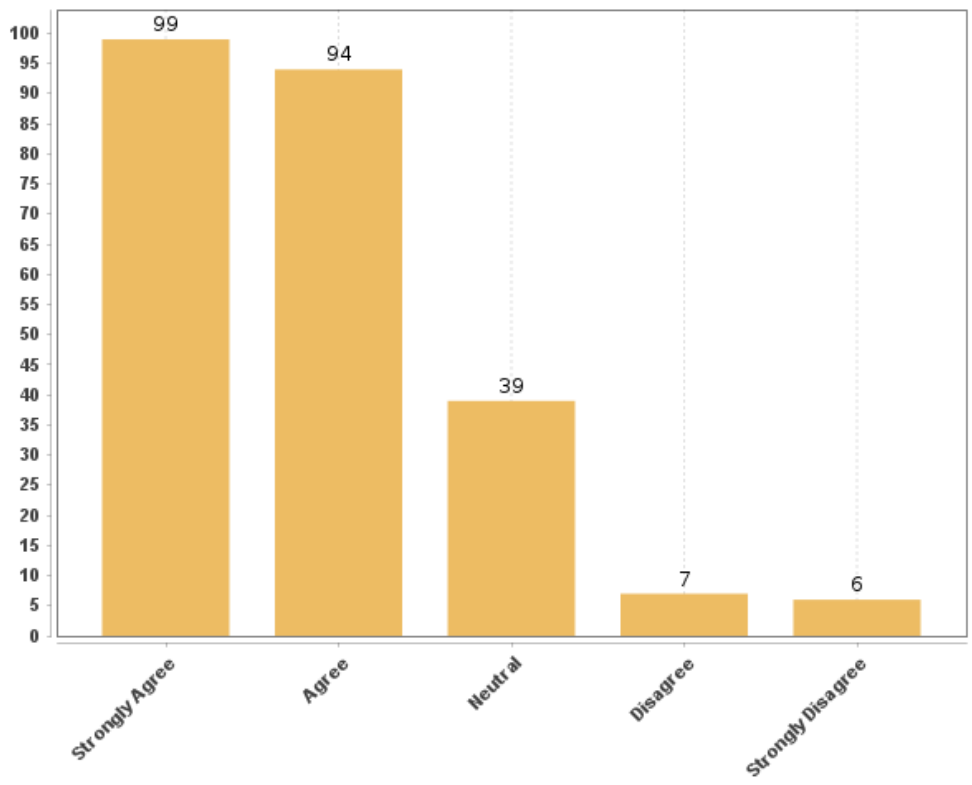
It was also suggested that walking and cycling routes and leisure facilities shouldn't be in the same question (1).

Housing and inequality

1 person commented that good quality housing is essential to strong communities. 4 people commented that inequality is created by housing issues, with one stating that people are 'being marginalised because impoverished communities are ghettoised in Oxford'. It was suggested that mixed housing types, including putting social housing in less deprived areas, is needed (2).

Key worker housing

Graph of online questionnaire results: Provision of more key worker/staff accommodation should be encouraged as it would help support schools and hospitals



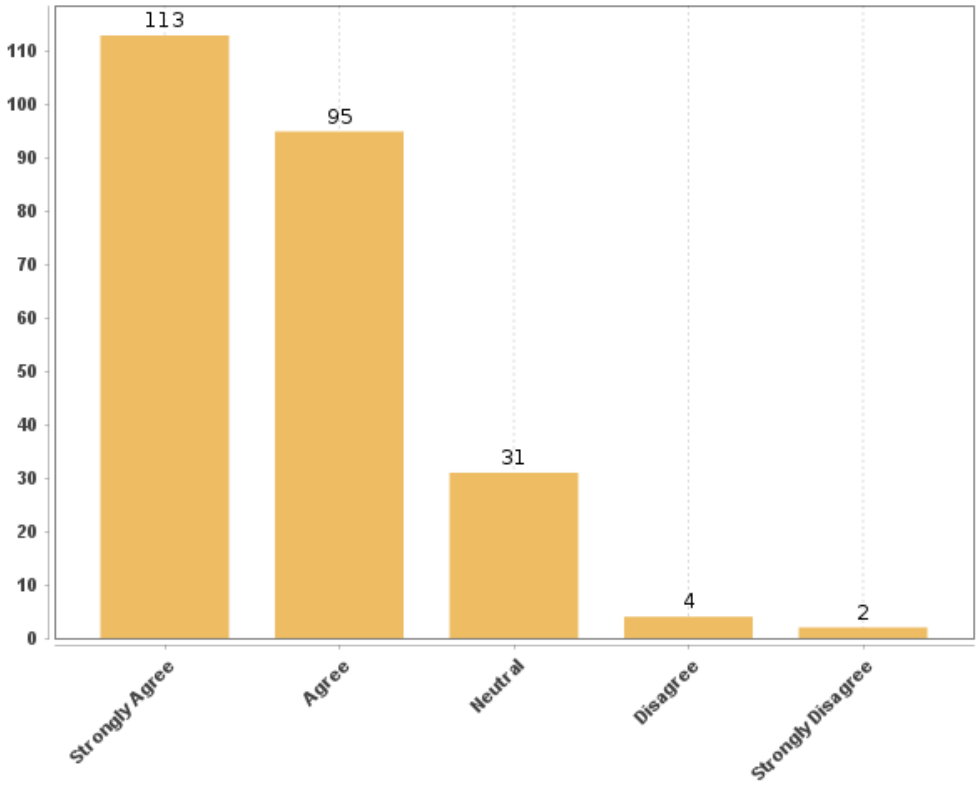
Some people questioned the provision of key worker housing:

- If you sort out the overall housing crisis, key worker housing won't be needed (1).
- Housing allocated for key workers skews the market and makes it harder for those on low incomes (1).
- If key worker accommodation is tied to someone's job, will they lose their home if they change their job? (1)
- Cleaners are the lowest paid but don't qualify as key workers and many struggle to afford to travel to work (1)

One person commented that making it possible for key workers to live in Oxford should be a high priority. Another person commented that car parking at the hospitals and universities should be moved underground, enabling flats built on the current car park sites.

Health services

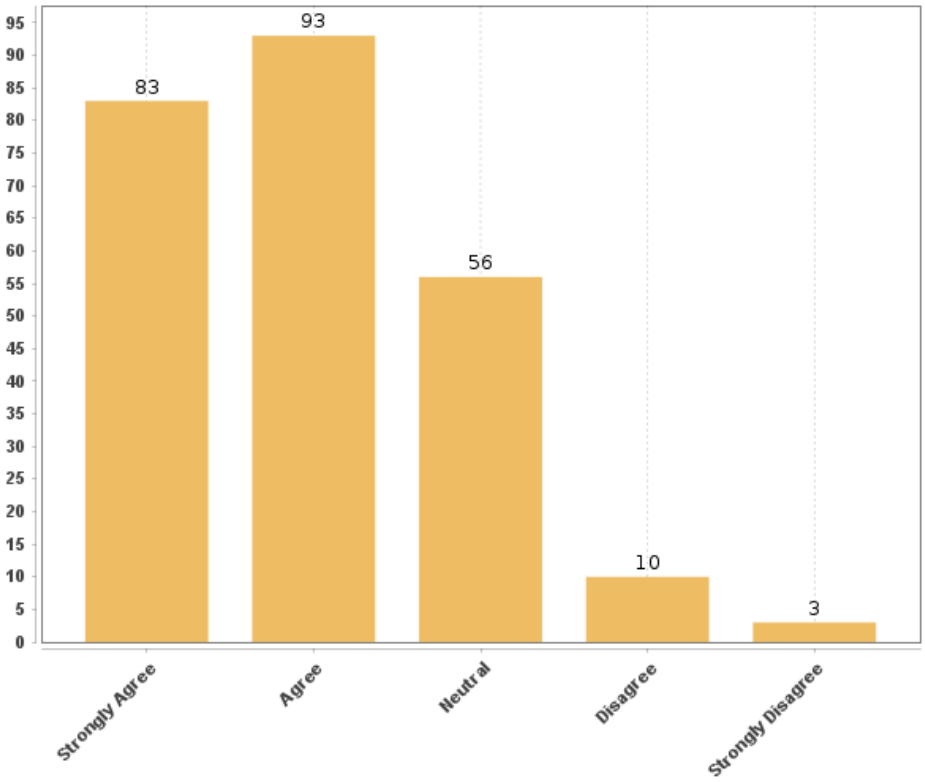
Graph of online questionnaire results: Local facilities such as GPs, hospitals and medical research should be strengthened to support the health services



- Facilities should be local, but Dr's and hospitals are illness, not health services (1)
- Current medical provision and community facilities in North Oxford are inadequate, i.e. Five Mile Drive (1)
- Where is the data on this? I have no idea what GP provision is like in the city (1)
- Focus on health promotion. The healthier we are, the less health services we need to cater for (1)
- Alternative Health facilities should be put on a par with NHS facilities going forward (1)
- Fund the NHS, raise community pride (1)
- GPs and hospitals are the health services (1)
- I don’t see how the City Council can influence the GPs and hospitals (1)
- Hospital & University development contributes to the housing crisis (1)
- I don't see why 'medical research' has been included (1)

Community facilities - level of provision

Graph of online questionnaire results: Space/facilities should be provided for communities to gather and interact



1 person felt that existing facilities are generally good, but that these should not be reduced. Another felt that there are not enough community centres or meeting places in Oxford. 2 people suggested that local facilities should be expanded given expected population growth. Another commented that many community services are being closed or privatised.

It was suggested that the focus should be on improving facilities in the most deprived areas, with better support for local support workers (1). It was also suggested that the universities should support the provision of community facilities (1).

Community sports facilities

2 people commented that closing Temple Cowley Pools has reduced facilities and that this should be reinstated. 2 people also suggested that sports facilities/services should be subsided or free. It was also suggested that more should be done to promote access to sports facilities (1) and that sports facilities should be supported by staff to ensure maximum benefit (1). 1 person suggested that an outdoor swimming pool and recreational areas should be created at Wolvercote Meadow.

Community Green Spaces

3 people stated that access to public green spaces should be preserved/promoted. With 1 person commenting that trees and woods also have an important role to play in helping to improve air quality. It was also suggested that more facilities such as improved allotments and community gardens could help inequality issues (1).

Other community facilities
5 people commented that children's centres in Oxford should not be closed. It was also suggested that access to arts and culture should be promoted (1). One person suggested that loss of pubs and churches is limiting community gathering spaces (1). Sandford Cafe was put forward as an example of a community effort (1).

The built environment and social interaction
It was suggested that buildings need to be configured to encourage interaction, with the examples of Vauban and Freiburg being given (1). It was also suggested that indoor and outdoor spaces are needed for communities to gather in a very local area (1). Another person suggested that places for interaction already exist and if people want to, they can and do use them (1). It was suggested that co-housing schemes could supervise communal facilities (1) and that home zones are important in building communities as informal communal spaces right outside the front door (1).

A few people raised concerns about designing the built environment to encourage social interaction:

- Don't force community interactions through spending unwisely (1)
- The state isn't much use at getting "communities to interact". Sounds like East Germany 1960. (1)
- This smacks of 'social engineering'. Not part of the remit. (1)
- In my experience elsewhere, the energy for social interaction is long-term key people, not property. (1)
- Life satisfaction is a result of personal fulfilment, not community spaces. (1)

Jobs /income/skills
Some respondents stated that inequality, including in educational attainment, is very bad in Oxford (1) and that more should be done to develop mentoring, knowledge exchange & volunteering opportunities in the city (1). It was also suggested that more adult education will help people learn new skills (1).

1 person suggested that a universal basic income would be desirable, whilst another person commented that there will always be poor people and none of these options address this.

Summary of communities, health and wellbeing comments in letters and emails

Provision of facilities for sport recreation and leisure
High-quality, attractive, lit, cycleway interconnections between homes, parks, leisure centres, playgrounds etc should be a very high priority.

Protecting and improving the Council's sports facilities and designing places that encourage physical activity. (Sport England)

Local facilities
There has been increased housing and student accommodation numbers but a reduction in facilities. Need improved access to community facilities and services.

The Council should look at options which encourage the use of under-used green and open spaces. (Magdalen College)

Land should be protected to provide new and expanded schools at locations selected to give sensible geographic coverage, to limit travel, and to facilitate active travel modes. (Oxford Civic Society)

Should a large proportion of growth be allocated towards Central / West Oxford a new primary school site should be considered. There is an existing shortage of primary schools in the west of Oxford. (Oxfordshire County Council)

Need to provide more graduates and skilled employees. Also need to serve less affluent suburbs better, improve education in these areas. (Solid State Logic)

Consider how to assess the need for indoor sports facilities over the plan period. (Sport England)

Key worker/staff accommodation to support schools and hospitals

All schools in the City face difficulties in recruiting and retaining staff. Council policy on key worker accommodation includes provision for primary and secondary. (Magdalen College) + (Oxfordshire County Council)

Need to recognise key worker housing as an effective way of providing affordable housing. University of Oxford – Estates)

Space/facilities for communities to gather and interact

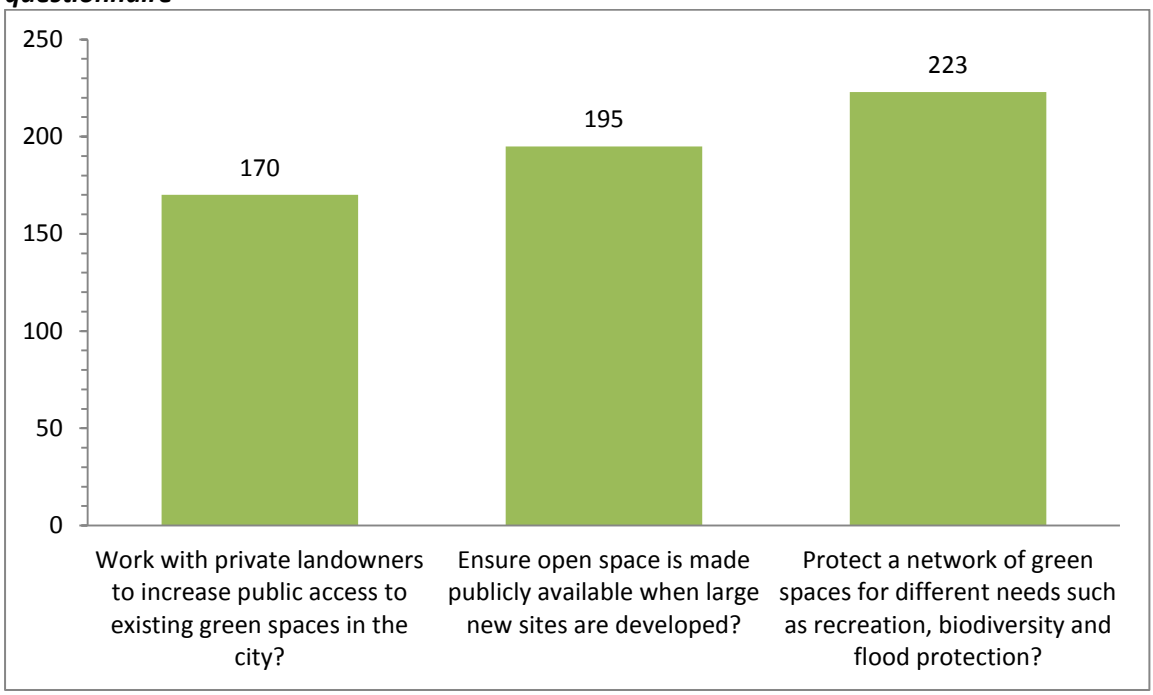
Plan should protect the retention under local community ownership or control of community centre and boatyard facilities on the canal in Jericho.

The need and potential usage should be assessed properly on a neighbourhood basis.(Oxford Civic Society)

• THEME 6: GREEN AND OPEN SPACES

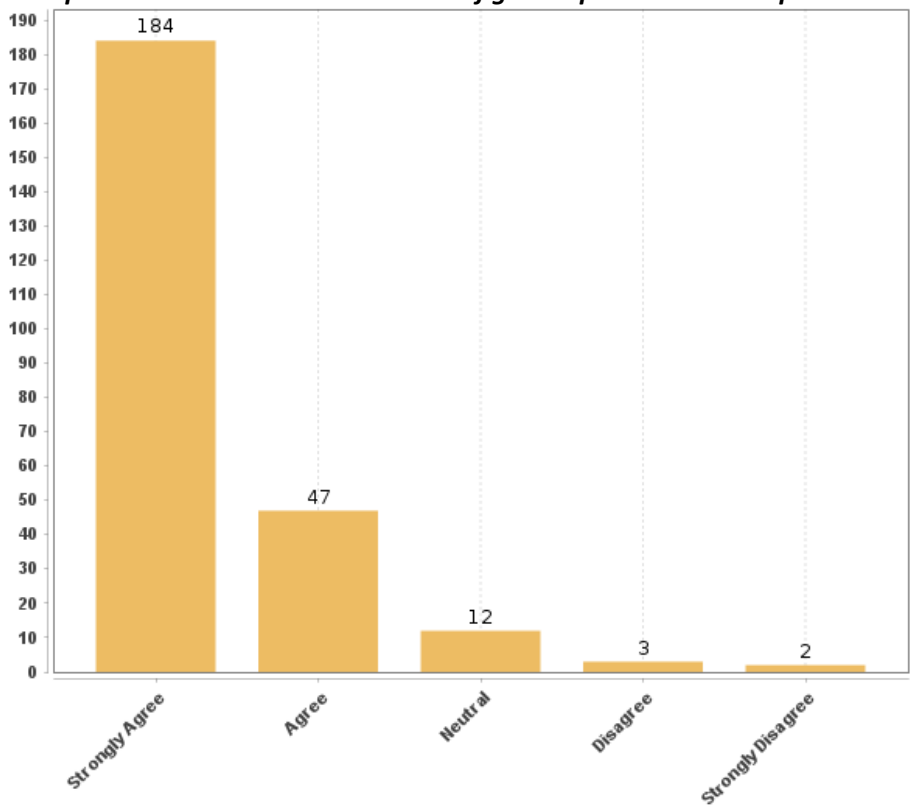
The following graphs illustrate the numbers of people who agreed with the statements on green and open spaces. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to green spaces in the leaflet questionnaire



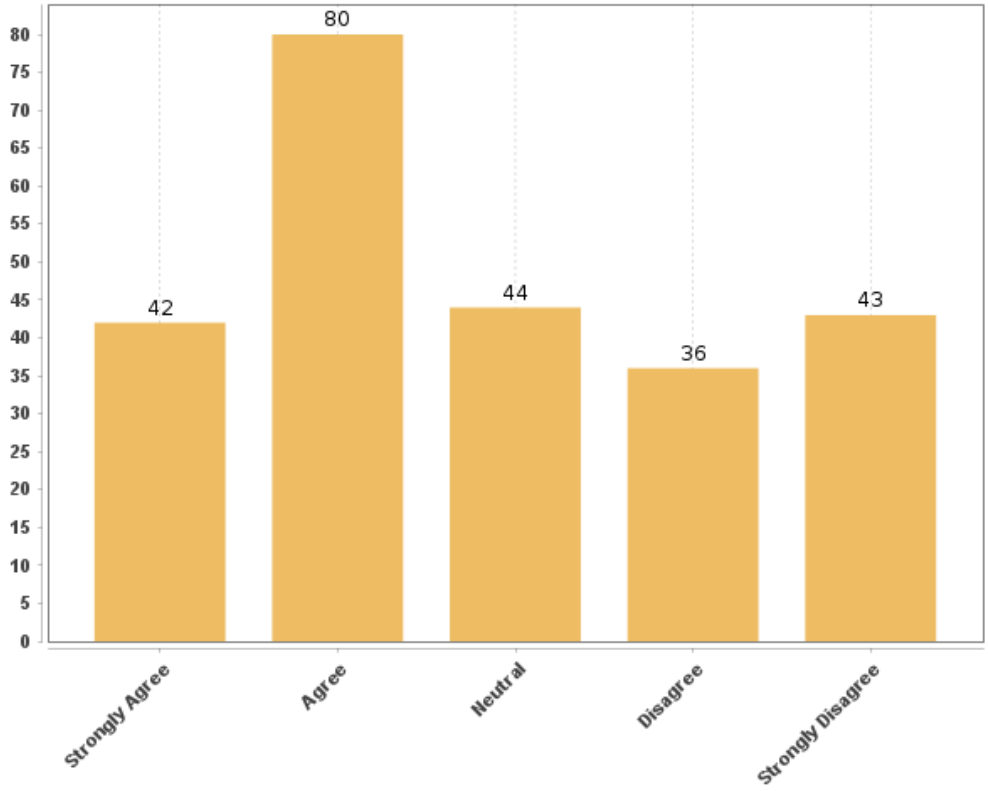
Value of green spaces

Graph of online questionnaire results: A network of green spaces should be protected



Protection of green spaces

Graph of online questionnaire results: Development on less sensitive green spaces should be allowed if it brings improvements to public open space



39 respondents pointed out the importance of greenspace and their enjoyment of it, many saying they felt it critical that green spaces are protected - most talking about quantity, 1 talking about quantity and quality and 1 in terms of quality. Small, large, natural spaces, parks, sports pitches and playing fields were all mentioned. The importance to quality of life and health and mental wellbeing was mentioned by 7 respondents. 3 respondents were concerned that losing some green space would be a slippery slope and that it is irreversible and that the council can't be trusted to control it. 1 respondent was concerned most green space had been lost already and 1 thought development on brownfield land should take precedence.

21 respondents pointed out the importance of green land for flood protection, 1 highlighting the importance of woodland particularly (with the added advantage of improving water quality), and 1 suggesting new development should not have been allowed on Earl Street as it flooded surrounding homes and 1 concerned about tarmacking flood plains, such as the planned Seacourt extension, 1 concerned about Port Meadow and 1 saying they should not be built on without SuDS and clever design, such as stilts.

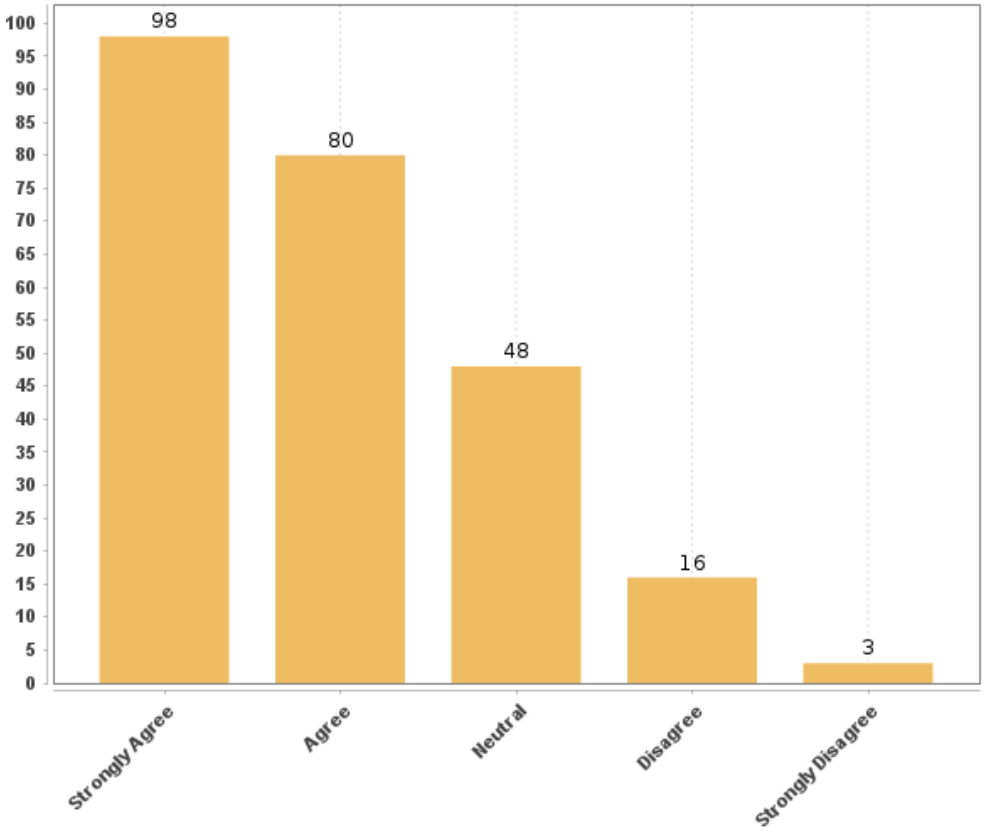
6 respondents noted the importance of green spaces for biodiversity, with worries that biodiversity is being lost, the importance of wildlife corridors being noted and specific sites of concern mentioned, 3 respondents referring to the Lye Valley SSSI area and 1 to Rock Edge Nature Reserve and 1 saying landowners should be encouraged to manage green areas for biodiversity.

11 of these respondents questioned who would define 'less sensitive' green spaces, and how they would be defined. 6 respondents thought some green spaces could potentially be developed, 1 of these referred specifically to the golf course, saying it is 'an indecent waste of space for a relatively

small elite of people' others saying using some green space may be ok if it improves quality and access to green spaces, which might be more important than quantity, or if it's limited to council/housing association space, and if it is sensitively done, for example low density and keeping it green.

Public Access to Private Spaces

Graph of online questionnaire results: Public access to existing private green spaces and recreational facilities should be sought



23 respondents were keen to see more public access to private open spaces, many feeling that too much green space in the city is limited to University use (1 respondent referred specifically to the University tennis courts on Abingdon Road), and also the WM Morris site was mentioned as needing to come back into public use. 1 respondent noted there is already access to many college grounds.

River areas and flood protection

1 respondent said that they treasure the 'scruffy, tranquil' places around the river and would not like them tidied up or publicised. 6 respondents considered that the river areas are underused and 'tatty', especially in the centre where they could be beautiful amenity spaces, important for leisure and tourism, and paths should be improved, perhaps into avenues on at least one side of waterways or wildlife parks created.

Allotments

7 respondents said it is important that we protect allotments, and 1 of these wondered about transforming dilapidated allotments into food business opportunities.

Green Belt

1 respondent said more homes should be built on the green belt, 3 respondents said that green space inside the city needs protection more than green belt, with a better option being to extend into the Green Belt, for example between oxford and Didcot/Abingdon. 2 respondents said that there should be no building on the Green Belt and the city must use its own resources.

Amenity space

13 respondents pointed out the importance of amenity green spaces, saying that green spaces within developments large and small are important to avoid 'concrete jungles', and 3 respondents saying there should be better communal areas for flats with families and where there are small houses, and 1 saying it is important existing gardens aren't concreted over. 2 said it is important that we check we will get something functional, not left over space in odd corners.

Care for green spaces

5 respondents said that green spaces need to be better looked after, for example no dogs in playgrounds, more dog waste bins, and people behaving better, 1 respondent suggesting more wardens or police presence and there should also be more affordable options for youth.

Other comments

1 respondent said that integration of vegetation and buildings is important, 1 said there is a need to reduce housing density, not increase it, and 1 said building on Northern Gateway increases housing and pollution pressures and is not a good use of land. Another respondent said we should not be developing any large new sites. 1 respondent said the ice rink should be protected and a swimming pool is needed in the city centre. More community use of spaces for events like Common People was suggested. 1 respondent wondered about compulsory purchase of unmanaged woodlands, to be donated to the Oxford Community Land Trust. Another idea was for a volunteering scheme for willing neighbours to look after green areas. It was suggested by 1 respondent that the amount of open space should be lined to the population. More facilities for disabled users was also mentioned. Green roofs for new large buildings should be mandatory and publicly accessible. 2 respondents said they appreciate green spaces as they are.

Summary of green and open spaces comments in letters and emails

Network of green spaces

This network needs to be accessible by quiet safe cycling and walking routes that link the nodes of the green spaces. (Natural England)

Where possible, visitors and commuters into Oxford should have the choice to take a green route into the city centre. (University of Oxford – Estates)

An appropriate network linking green spaces needs to be agreed and new links made if necessary. The network should be designed to contribute to recreation and biodiversity and include wildlife corridors. (Wolvercote Neighbourhood Forum)

Public access to existing private green spaces

Whilst there is a case for improving public access to private spaces and encouraging the sharing of facilities, this should be voluntary. (Magdalen College)

Support the Council in seeking public access to existing private green spaces and recreation facilities. (Wolvercote Neighbourhood Forum) + (CPRE) + (South Oxfordshire and Vale of White Horse District Councils)

All spaces and facilities need to have ample cycle parking. It would ease the pressure on the publicly-accessible green infrastructure if better arrangements for access were made available by private landowners. (Oxford Civic Society)

Potential for development on less sensitive green spaces

Object to the loss of a green space and would be seeking enhancement of "a less sensitive" green space. (CPRE)

We agree that many of the green spaces contribute to the special character of the city and may have historic significance too e.g. Port Meadow. We would therefore support their protection and enhancement. However, we accept that it is the case that not all areas of open space make such a contribution and that it may be acceptable to consider the development of these, subject to any other contribution they may make to other important matters e.g. biodiversity or recreation or flood relief. (Historic England)

There is a role for selective development where s106 contributions can fund improvements to the accessibility of other, more environmentally or aesthetically valuable spaces. (Magdalen College)

Less sensitive green spaces (including those in the Green Belt) should be under continuous review and considered for employment growth. (Merton College) + (City's Major Bus Operators)

A range of different sites from small-scale sites to opportunities for large scale developments should be considered. A priority should be to improve the quality and increase the use of recreational areas. Development on less sensitive green spaces should be considered, if it facilitates improvements to public open space, and contributes to the optimisation of land use. (Oxford Civic Society)

Welcome the City Council reconsidering existing restrictive planning policies of blanket protection of public open space. (South Oxfordshire and Vale of White Horse District Councils)

There should be no further use of playing fields and other recreational land as demand for these will grow as the population increases. (Solid State Logic)

The Council's PPS advises protection of all playing field provision in the City and we would expect to see this reflected in the draft plan. (Sport England)

Development on less sensitive green spaces should be allowed if it brings improvement to public open space. (West Oxfordshire District Council)

Concept must not be used as justification to build urban extensions in the Green Belt (Sunningwell Parishioners Against Damage to the Environment)

Balance the development of poor quality and under-used land by the conservation of other land as a high quality amenity space. (University of Oxford – Estates)

Lower-quality recreational spaces should be made fit for purpose rather than developed. If a proposal is made to develop existing green space, the local community should decide if there are compensating improvements offered by the developer. (Wolvercote Neighbourhood Forum)

Comments on specific green spaces

Concern about Lye Valley SSSI, should be stronger designations to discourage speculative developers. SuDs not being maintained. Intensification of development may mean even more impermeable surfaces, so green spaces ever more important. Flood protection value of Lye Valley and golf course also.

Policies should protect and conserve Headington's green spaces and their associated biodiversity. (HNP) Jericho is very short of green spaces.

Some designated sites within the City are particularly vulnerable to development pressure. These include Oxford Meadows SAC and Lye Valley SSSI. An up-to-date evidence base will be needed to inform assessment of any likely effects on these sites of proposals and policies within the Local Plan. (Natural England)

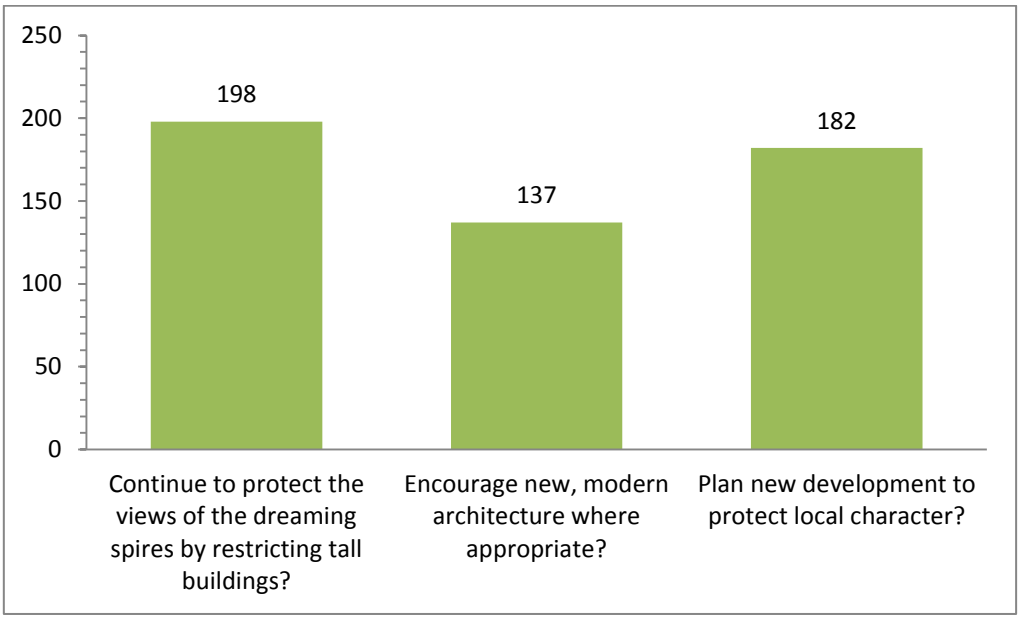
Support the possibility of building on Greenfield sites within the City's boundaries. (West Oxfordshire District Council)

The surplus land on the Summer Fields site has the potential to accommodate appropriately residential development and commercial activities. (Governors of Summer Fields School)

• THEME 7: DESIGN AND HISTORIC ENVIRONMENT

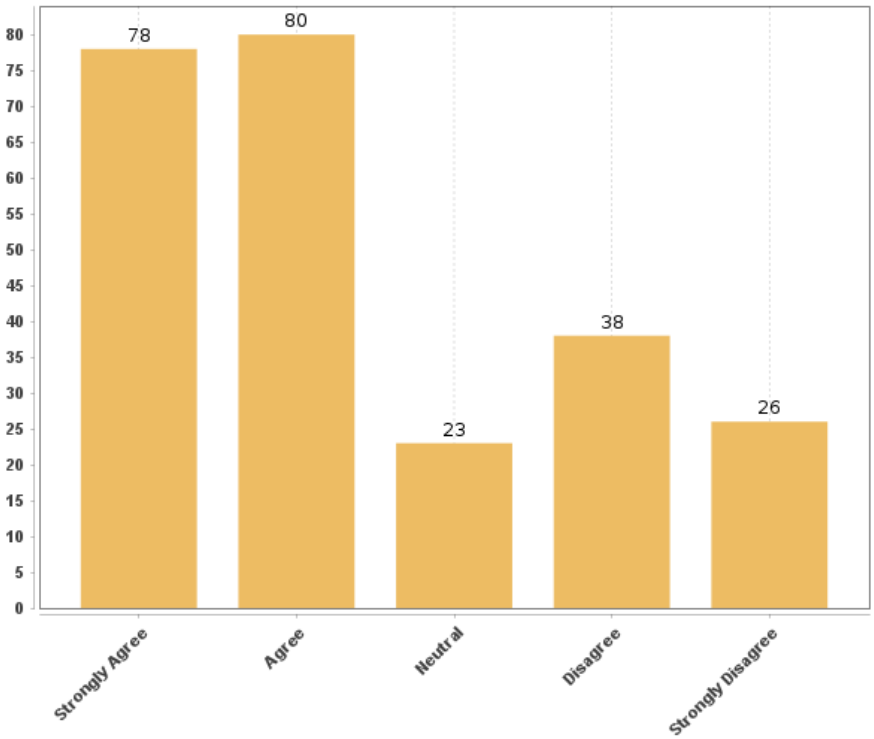
The following graphs illustrate the numbers of people who agreed with the statements design and the historic environment. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to design in the leaflet questionnaire



Building Height

Graph of online questionnaire results: Taller buildings could be located in some areas if well designed



8 people stated that they did not want to see taller buildings being built in Oxford. Reasons given were: taller buildings are oppressive & create wind tunnels (1); taller buildings will have a negative impact on the historic environment (2); Oxford's views are irreplaceable (1); taller buildings mean that there will be more office and residential uses which will increase the city's carbon footprint (1);

and taller buildings will increase the city's population (1). 2 people said that higher buildings have always been unsuccessful in Oxford.

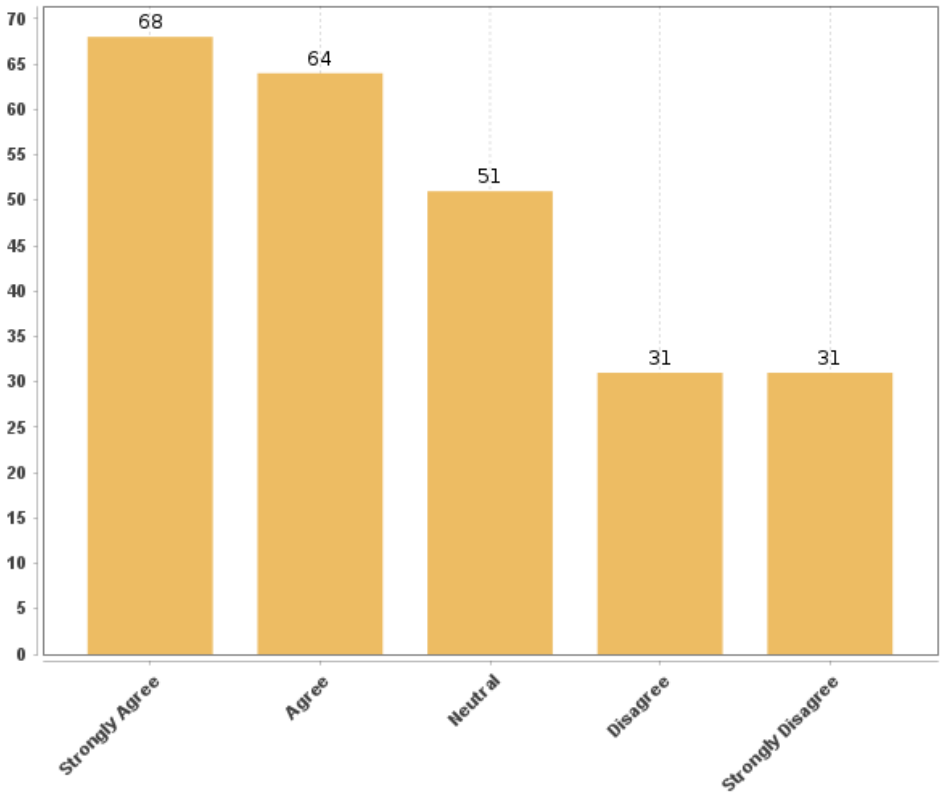
A number of people felt that taller buildings could be acceptable if…

- Oxford's historic skyline is protected (9) / View cones are maintained (6)
- They respond sensitively to the city's character and built heritage (4) / They make a positive contribution to Oxford's skyline (1)
- They are of high quality architectural design (4)
- They are located in less sensitive areas (12) / Not in the City Centre (7) / Not in Conservation areas (2) / They are located at the edge of the city (3) / Not at Northern Gateway (1)
- Building higher reduces the need to build on green spaces (3)
- Taller buildings are only permitted for residential uses (1)
- Policies limit height to no higher than four storeys (1)
- They are a last resort (1)

Some people felt that building higher is necessary to cope with growth (3). 1 person commented that taller buildings are more energy efficient. It was also suggested that there could be a 'happy medium' between individual units and tower-blocks, such as condominiums (1). 1 person said that they would prefer to see new towns on restored railways lines, rather than in the city itself.

1 person commented that the needs of people should be prioritised above protecting views, whilst another person suggested that not all view cones are important. 1 person commented that the skyline sometimes feels fake and that it is a bit like living in a theme park.

Graph of online questionnaire results: Modern architecture and higher densities should be encouraged



Building Densities

Many people felt that higher density developments should be encouraged (10). It was suggested that densities should be higher in North Oxford (1) and that it should be made easier to convert shops to housing (1). One person commented that protecting views should not be used as an excuse for keeping density low.

Several people felt that higher density development could be appropriate if:

- It is only built in appropriate locations (4)
- Overcrowding is avoided (1)
- Infrastructure is provided to support this (2)
- Development is of good architectural design (2)
- It does not harm the city's character (1)
- Parking restrictions are imposed (1)

6 people suggested that higher density development should be avoided. Reasons given for this included: this doesn't solve problems (1); existing densities should be respected (1); high densities can cause stress and conflict (1); high density housing is not done well in the UK so don't try (1). One person suggested that densities should be reduced, not increased.

Use of Modern Architecture

28 people were in favour of seeing more modern architecture in the city. 4 people suggested that innovative/radical/cutting edge design is part of Oxford's character. A further 4 people suggested that Oxford should not be stuck in the past. 9 people commented that they wanted to see a mix of new and old buildings in the city. 2 people commented that exciting modern architecture should not only be used for university buildings.

A number of people felt that modern architecture could be acceptable if:

- It responds to Oxford's character and heritage(12)
- It is well designed (9)
- It doesn't mimic character of historic buildings (3)
- It is not generic (1)
- It doesn't copy designs from elsewhere (1)
- Only well-known/the best architects are used (3)
- The overuse of concrete is avoided (4)
- The overuse of glass is avoided (3)
- Square/boxy developments are avoided (2)

3 people commented that modern architecture is not appropriate in Oxford. 2 people said that they prefer traditional architecture. It was suggested that modern architecture is destroying the character of Oxford (1) and that all buildings should mirror existing buildings in the area (2). 1 person said that there should not be modern buildings in city centre, whilst another person said buildings should only be modern on the inside. It was also suggested that not all developers have the money needed to achieve design quality (1).

Morden architecture people said they liked:

- Blavatnik (3)
- Barton Park (1)
- Centre for Asian Studies, Marston Road (1)
- New University/College developments generally (2)
- Railway side developments at Waterside/Unipart (1)

Modern architecture people said they didn't like:

- Castle Mill student accommodation (15)
- Blavatnik (2)
- Centre for Middle Eastern Studies (1)
- St Anne's new library (1)

Historic Buildings / Heritage

6 people commented that the protection of the historic environment in general should be prioritised. 1 person suggested that there should be more conservation areas. Another person suggested that heritage shouldn't make the city unaffordable (1).

Sustainability / Environment

1 person commented that it is vital to address global warming and air pollution, whilst another suggested that all new development should be stopped until the threat of climate change has been lifted.

It was suggested that all new homes should have solar panels as standard (1). It was also suggested that green roofs should be mandatory on new buildings, with public access encouraged on large buildings (1). 1 person commented that innovate approaches should be used to accommodate energy efficiency measures on historic buildings (1). Holistic approaches to ecological building (1) and the adoption 'PassivHaus' (Passive House) design principles (1) were also suggested. 1 person commented that trees should be considered early on in the design process.

Residential Developments

A range of comments were received specifically in relation to the design of residential development:

Housing tenures:

- Avoid ghettoization (1)
- Priority is building cheap, affordable homes for key workers like nurses and teachers (1)
- Focus on affordable housing (1)

Type of housing

- Avoid overly large houses that only accommodate a single family (1)
- Build 'family-friendly' blocks of flats e.g. traffic free inner courtyards with play areas (1)
- Oxford needs family houses not flats so taller buildings are not so useful (1)
- Two bedroomed homes complement terraced housing and flats (1)
- Consider mixed use buildings for work and home e.g. Paris (1)

Dwelling sizes

- Houses are already too small with too little green space (1)
- Provide enough space in new homes to reflect the modern lifestyles (i.e. more white goods in kitchens, complex recycling, etc) (1)

Development sites

- Build residential units over park and ride sites (1)
- Single storey housing along Oxpens seems a wasted opportunity (1)
- Build more homes where college owned land is not being used (1)
- Force colleges to rent empty premises (1)
- Gardens need protection (1)

Use good architects for social housing (1)

Incentivise home improvements to improve some areas (1)

City Centre Developments

It was suggested that a 'business district' could be created in the city centre (1) and that unattractive and/or disused city centre buildings should be renovated/demolished (2). It was also suggested that reference should be made to the Oxfordshire Creative Cultural Heritage & Tourism Investment Plan (1). Need more space for tourists in the city centre - narrow pavements are dangerous (1). Support independent local business (3). Fewer charity shops (1). Shop fronts should not detract from historic character in City Centre (1). Continue to provide public toilets and bins (1). Character/views are important for tourism (4).

Protect local centres (1). Don't join-up the villages by building between them (1). Jericho and Summertown are valued for local character but Cowley is unpleasant (1). The use of the word "villages" is inappropriate. These places are geographically administratively and socio-economically suburbs (1).

Support farmers markets (1).

Other General Comments on Design

Design quality is important (5). A strong design steer is needed (2). Good design is subjective (2). More public art (2). More inspiring public spaces (1).

Oxford projects should be beautiful rather than functional (1). Buildings should be functional as well as aesthetic (1). Architecture should be humane, not sterile (1). More attention should be given to quality and style of materials (1).

1 person commented that new development is not needed, with another suggesting that large scale expansion and development is not suitable in Oxford. It was also suggested that all teaching should be online so that everyone who wants to study in Oxford can do so and this would reduce the amount of people in Oxford and bring education to all worldwide(1).

Comments on the planning process/approach

- More involvement of local people (2). Public views are ignored (2).
- Views/character have not been well protected (6). Views spoilt by tree growth (1). Strong policies are needed to protect views (1).
- Need to be clearer about what local character is (1).
- Do not dictate architectural details (1). More aesthetic control (1).
- City Council not able to make design judgements (1). Stop and reverse bad design (1).
- Greater consideration of context (1)
- Tighter controls on the universities and colleges (3)
- Development should benefit local people (3)

Summary of design and historic environment comments in letters and emails

Taller buildings

Taller building would severely impair Oxford's famous skyline but they may be preferable to urban sprawl if well designed and carefully sited.

Historic England supports the Local Plan seeking to protect the skyline of the city centre through a general height restriction. (Historic England)

Monotonous continuity of building heights should be avoided. (Oxford Civic Society)

Support the protection of views but should widen this to include bulky buildings. The outward views from the City are also important. (Oxford Green Belt Network)

Building heights policy should be reviewed to allow taller buildings in some locations.
(South Oxfordshire and Vale of White Horse District Councils) + (Solid State Logic) + (West Oxon)

Taller buildings need to be pursued with care so that the important characteristics of the city are maintained. (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Taller buildings need to be located on the best public transport corridors. (City's Major Bus Operators)

The use of the 'Carfax height' as a limit on building height has been a blunt instrument and has resulted in most new development being built up to the height, creating an excessively uniform sky line. (University of Oxford – Estates)

View cones

Concerned at any intrusion into the setting of Oxford or into significant views into, out of or over Oxford. (Historic England)

Welcome the City Council reconsidering existing restrictive planning policies on view cones.
(South Oxfordshire and Vale of White Horse District Councils)

The Oxford Viewcone Assessment should be used to inform a more flexible approach, with taller buildings being clustered in areas which do no impinge in a material way on the historic skyline.
(Magdalen College)

'Oxford View Cones Study' may need to be updated in order to address the possibility of taller buildings in the City. (Thomas White Oxford Ltd)

Protection of key views is of particular importance. Oxford's View Cones may need to be reviewed to specifically address the potential for taller buildings. (University of Oxford, Christ Church, Exeter, Magdalen, Merton & St John's Colleges)

Higher density

Dividing large residential plots and infilling between existing buildings can deliver more housing without compromising quality of life and services. Increase housing densities on new build. (CPRE)

The opportunity presented by the Oxpens site should be maximised. Density should be optimised on all sites across the city. (Oxford West End Developments Ltd)

Higher density development is supported providing that these are in areas of good accessibility.
(Oxfordshire County Council)

Support for higher density. City Council should do all it can to achieve higher densities whilst maximising standards of urban design. (West Oxfordshire District Council) + (Sunningwell Parishioners Against Damage to the Environment) + (South Oxon and Vale of White Horse DCs)

Higher density developments need to be located on the best public transport corridors, where walking and cycling can be complemented by bus use. (City's Major Bus Operators)

Increasing densities would not only dramatically reduce land take, but also make it possible to accommodate all of Oxford's actual need within the City. (CPRE)

Higher densities will increase the viability of public and sustainable forms of transport and city-wide district heating infrastructure. (University of Oxford – Estates)

Modern architecture

Well designed and built modern architecture should be encouraged.

Nuffield College will bring a new vibrancy to the West End.

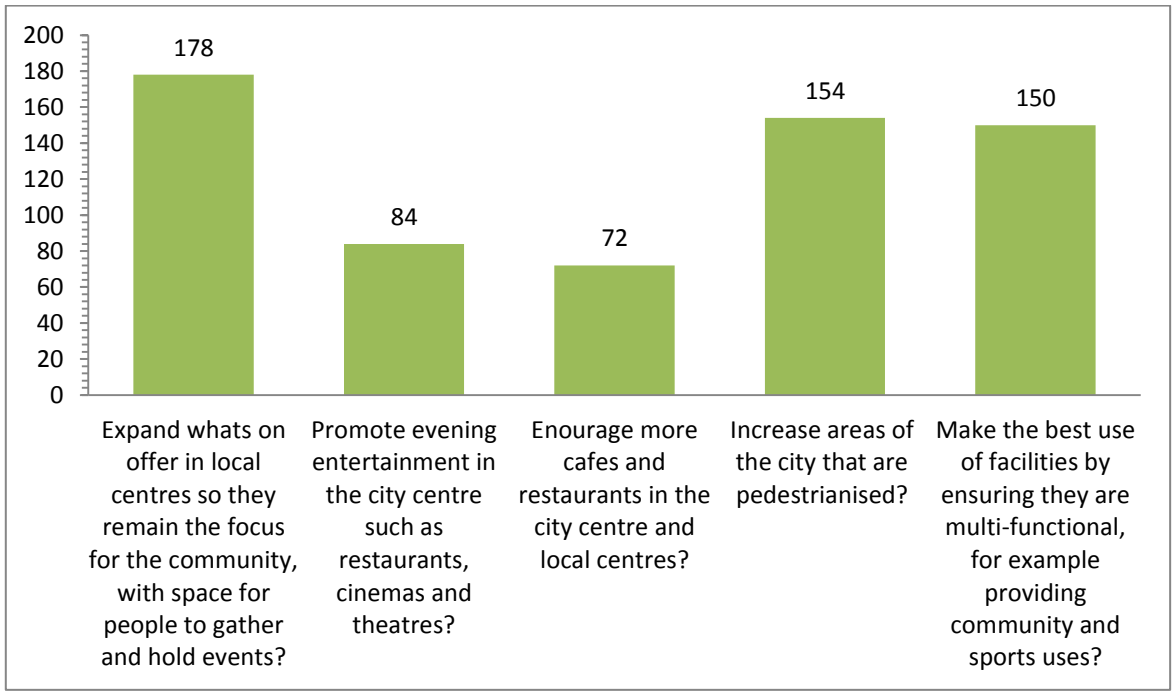
Modern architecture and higher densities should be encouraged (Oxford West End Developments)

Should feature more flexible design and space standards. (Thomas White Oxford Ltd)

• THEME 8: CENTRES, SHOPPING , ENTERTAINMENT AND LEISURE

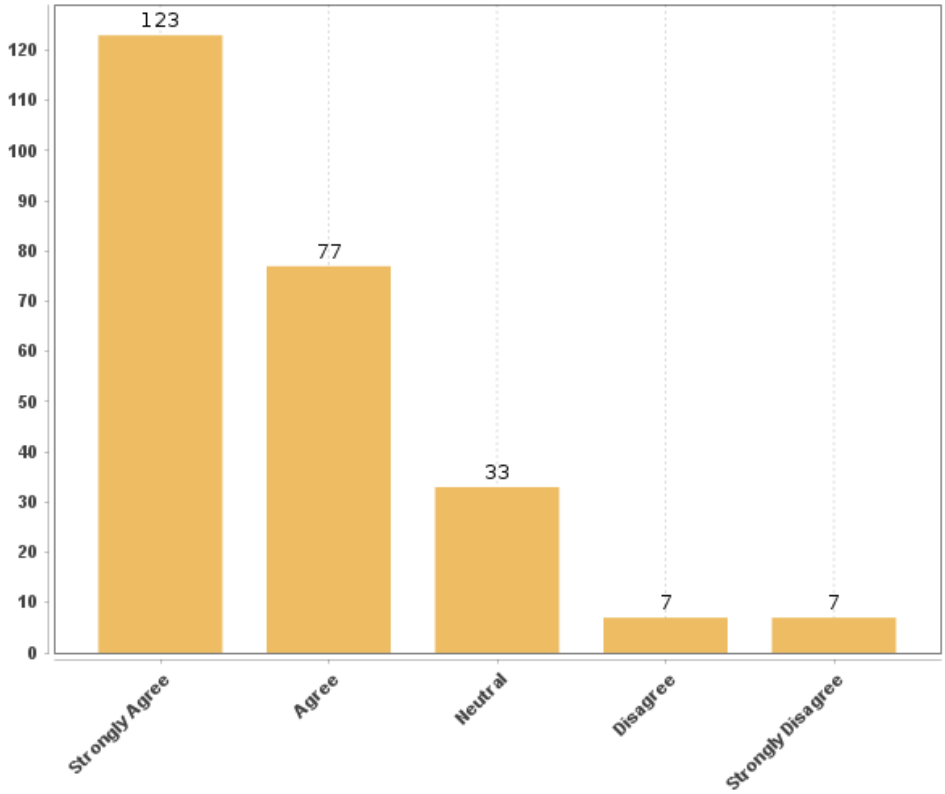
The following graphs illustrate the numbers of people who agreed with the statements on centres, shopping, entertainment and leisure. The green graph shows the results of the leaflet questionnaire and the orange graphs the results of the online questionnaire. A combined summary of the additional written comments made to both the leaflet and online questionnaires is also provided and this is followed with a summary of the emails and letters.

Graph showing numbers who agreed with the statements relating to design in the leaflet questionnaire



Pedestrianisation

Graph of online questionnaire results: Pedestrianisation should create a more pleasant environment for users



Several respondents commented to say they agree with pedestrianisation:

- Agree with greater pedestrianisation (4)
- Agree but these areas must be easily accessible (3)
- Agree but must not increase traffic congestion and pollution in the surrounding area (2)
- Agree but needs to be enforced (1)
- Agree but need to keep buses moving (1)

Some respondents suggested particular areas for pedestrianisation:

- Pedestrianisation of Hythe Bridge Street to create a more pleasant walk from the station (1)
- Stop buses returning to Queen Street (1)
- Pedestrianisation of Cowley Road to allow outside cafe seating (1)
- Pedestrianisation of Cornmarket to allow outside cafe seating (1)

Some respondents wrote further comments showing some reservations about pedestrianisation:

- Also need to consider the needs of those who cannot walk, or only walk short distances (2)
- Pedestrianisation of district centres would restrict access into city centre (1)
- Need to view total picture for pedestrianisation, not isolated parts (1)
- Pedestrianisation has not improved the city centre (1)
- Pedestrianisation can leave streets feeling lonely and unsafe at night if not well used (1)
- Reduce the polluting traffic so that pedestrianisation is less needed (1)
- Pedestrianisation reduces cycling (1)

Some respondents made comments about the way that pedestrianisation should take place:

- Also need to consider cyclists (3)
- Conflicts between cyclists and pedestrians in pedestrian areas (2)

- Need to provide more cycle parking facilities (1)
- Pedestrianisation should also allow some cycling, 'cyclists are guests', see Dutch cities(1)

Transport/Access - other

Several respondents wrote further comments relating to transport and access to the centres:

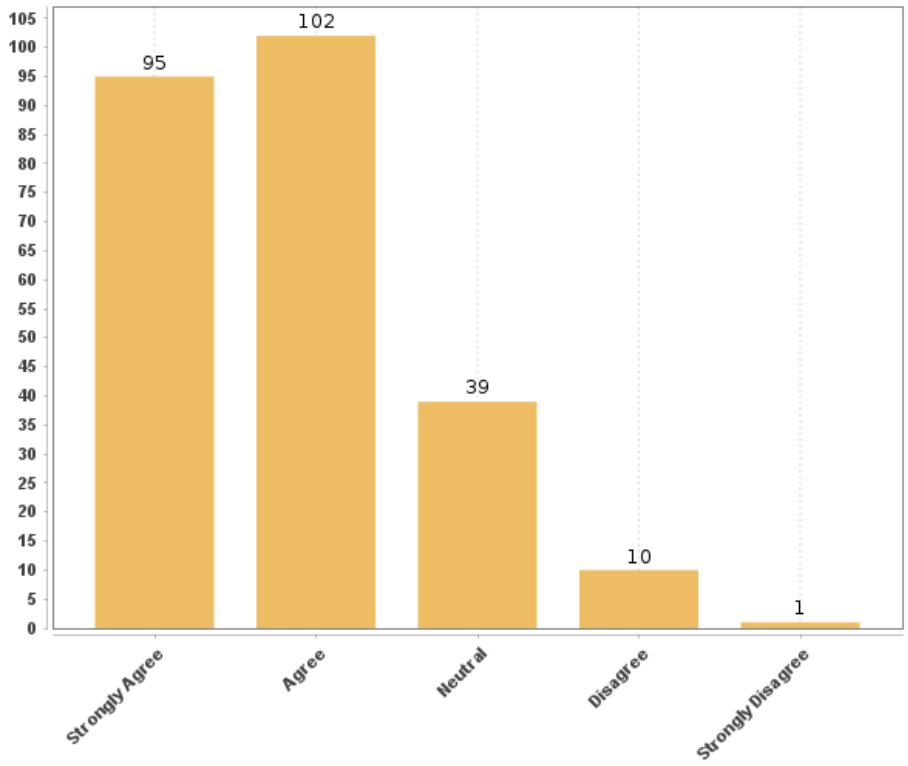
- Parking costs in Oxford are too high compared with surrounding towns (1)
- Car parking is important in local centres (1)
- Introduce a city centre congestion charge (1)
- 24hr public access to centres is important. No developer controlled public spaces (1)

Trees

5 respondents wrote further comments to say we should increase tree planting in centres.

District Centres

Graph of online questionnaire results: Local centres should be enhanced to provide a greater range of facilities for local needs



Maintain distinct character of each centre (2)

Shops and facilities can be easily accessed in most areas (1)

Several respondents commented on specific centres:

- Blackbird Leys needs a wider variety of facilities (3)
- City Centre rents are too high (1)
- Cowley Road should have a central feature/area (1)
- Cowley Road needs more retail (1)

- Cowley Road new pavement is poor (1)
- Cowley Road has too many food outlets (1)
- Cowley Templar Square should be moved outside the ring road to preserve local shops (1)
- Cowley Templars Square needs improvements and better traffic controls (1)
- Headington should have a central feature/area (1)
- West Oxford needs a district centre – this could be near Waitrose and linked to Osney Mead (1)
- Should consider Botley (1)
- Too many estate agents and charity shops in Headington (1)

9 respondents made further comments to say that we should encourage community centres in the districts, and that adequate facilities are needed for the population. It was pointed out that there is no community centre in Marston (1), 1 respondent said East Oxford needs a community hub and information, 1 said that there are not enough facilities in Headington and 2 said community centres are not in the best locations, eg in Headington. It was seen as important that community facilities stay in control of local people (1).

Several respondents wanted to see improvements to the environment of district centres or a broader range of activities offered:

- Encourage cafes and entertainment in districts (1)
- Districts need attention – empty stores and no street life (2)
- Don't allow too many restaurants or banks etc in the district centres (1)
- Encourage an evening culture in the districts (2)
- Improve the street scene of districts – cleaner environment (1)
- Encourage more in districts over the city centre – need more life (2)

Retail

Encourage local, independent retail / cafes (13)

- By not increasing Covered Market rents (1)
- By lowering business rates for local independent businesses (2)
- Lowering rent for local business (2)
- By protecting the covered market (3)

More independent cinemas and theatres (1)

Retail less important with increasing online shopping (4)
Many shops have already been priced out (1)

Many respondents wrote further comments on the type of shop or use they would like to see in the city centre or district centres, or that they would like to see less of:

- More hobby shops (1)
- Limit the number of betting shops (2)
- Limit the number of estate agents (3)
- Limit the number of chain coffee shops (20)
- Encourage better quality cafes in the centre (1)
- Create a more European atmosphere (outdoor dining) (2)
- Limit the number of tanning salons (1)
- Limit the number of tourist shops (1)
- Have enough restaurants (15)
- More family orientated restaurants (2)
- Less Fast Food (2)
- Shortage of restaurants (1)

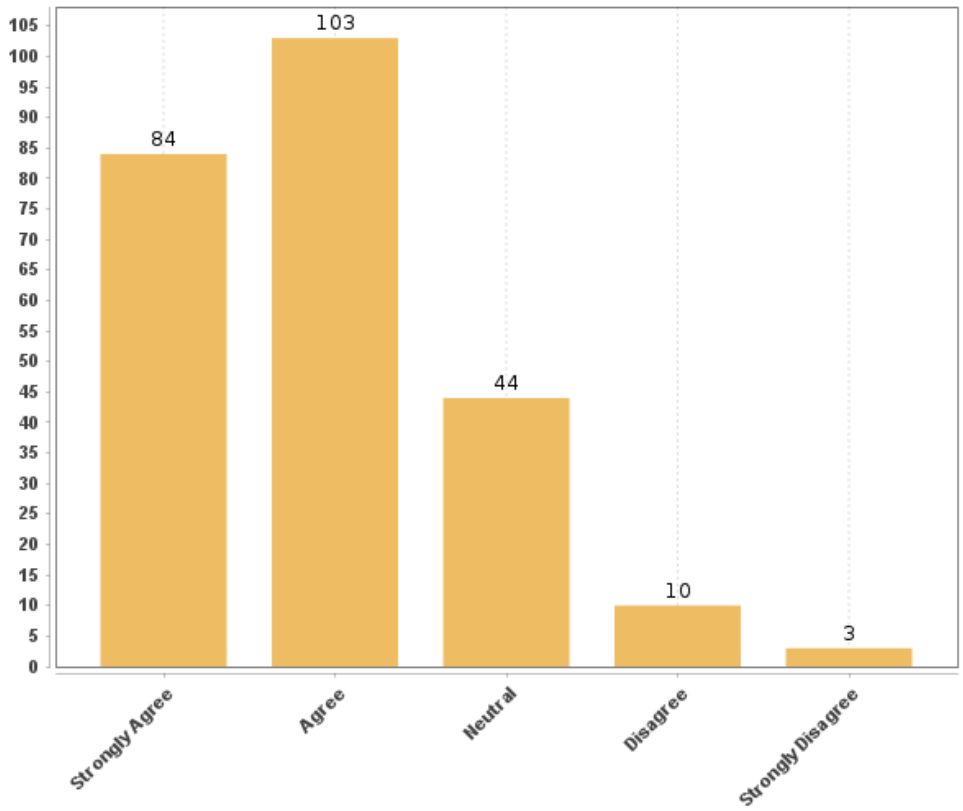
- Improve the quality of restaurants (1)
- Don't need any more shops/ shopping developments (4)
- Make sure there are adequate supermarkets in town for those without cars (1)

Small shops with on street frontages, not large scale shopping malls (1)
Need a variety of shops (2) not just for students (1)

Have shops mixed into residential areas, not just on central roads (1)
Any out of town developments should be self-sustaining (1)
Develop centres for the community, not financial gain (2)
Discourage out-of-town shopping developments (1)
Encourage out-of-town retail with adequate parking (1)
Better shopping quality in line with Swindon and Reading (1)
Drone delivery system (1)

Other uses

Graph of online questionnaire results: Modern high streets should include other uses alongside retail



Most centres already include other uses (1)
Multi-functional facilities (2)
Increase general range/diversity of uses (unspecified) (2)
Centres should also include: residential (6); health/social care uses (2); leisure uses (3); community facilities (2); workshop spaces for small businesses (1)

Already too many empty shops – find new uses (1)

Allow for non-commercial activity (1)
Create cultural hubs for multiple use (3); need a large performance hall (2)
Centre should adapt and not be micro-managed (1)
The centre has enough chains + restaurants. No need for more but need to look after the entertainment: recycling, cleaning and protecting users. (1)
Preserve the centre's character (1) enough leisure stuff and cafes
Oxford's economy cannot exist on consumption alone, need producers of new ideas, businesses and productive events to mobilise our great city centre and surrounding areas.

Evening Entertainment

Do not increase eating and drinking outlets (2) as they lead to antisocial behaviour (2); they are bad for health (1)
More evening entertainment would need more control. (1); Increased policing in the centre at night (1); Increasing night time economy could overstretch the police. (1)
Do not need more evening entertainment. (4)
More evening entertainment(2); Non-alcohol based (1); Inclusive of all demographics (1); More family orientated evening activities. (1); New Year concerts in town hall – Brilliant (1)
Can schools be used better during holidays and in evenings (1)

Leisure ideas

Broader and more diverse leisure activities (3)
Develop the facilities in the city for the people both days and evenings in keeping with the character of the city. (1)
Encourage Oxford's cultural spaces (1); Promote and support cultural activity not only to attract visitors but for the wellbeing and community cohesion and enrichment of local community (1)
Already enough entertainment and leisure space in Oxford. (1)

Summary of centres, shopping, entertainment and leisure comments in letters and emails

Local centres should be enhanced to provide a greater range of facilities

Centralisation of larger-scale facilities does not enhance the sustainability or diversity of shopping, entertainment or leisure in neighbourhoods. May lead to decline of local facilities.

These centres and city centre sites must have good cycle access and parking. Oxford should provide facilities for their visitors. Enhancement of local centres that unlock a greater range of facilities for local needs would also present an opportunity to provide sustainable transport hubs (Oxfordshire County Council)

Local centres should be enhanced to provide a greater range of facilities for local needs and those high streets should include other uses alongside their traditional retail focus. (Sainsbury's Supermarkets Ltd)

Local centres should be enhanced and provide space for people to gather and that the facilities that local residents identify as necessary should be provided. (Wolvercote Neighbourhood Forum)

Mix of uses in high streets

The Westgate Centre will move the centre of gravity for retail and commercial activity further west, which could provide an opportunity to review other areas, such as the eastern end of the High Street as their viability will be impaired. (Magdalen College)

There is a pressing need for alternative uses to be encouraged and supported in the city centre. Recommend that forthcoming planning policies reflect the Government's approach in the GDPO between A1 and A2 uses. Recommended that Oxford City Council undertake a review of the existing requirement that A1 uses within a frontage are maintained of at least 80%, and that, this is removed or substantially reduced. (Metro Bank)

Modern high streets should include other uses alongside their traditional retail focus. (Oxford Civic Society)

There should be sufficient flexibility in policy so that vacant premises, do not remain vacant for prolonged periods but also seek to group A1 uses together within the primary and secondary shopping areas / frontages. Policies should be drafted in such a way to drive footfall to the centre. (Sainsbury's Supermarkets Ltd)

Mixed developments offer a better opportunity to respond to development needs. (University of Oxford – Estates)

We do not consider that there is any need for more evening entertainment and restaurants to be provided. If the suggestion that the modern high street should include other uses alongside traditional retail outlets means the provision of housing, it would be welcome. (Wolvercote Neighbourhood Forum)

LIKES AND DISLIKES ABOUT OXFORD

The Environment

Respondents noted a variety of likes and dislikes about the built and natural environment of Oxford:

Likes	**Dislikes**
<u>Built environment</u> Architecture/Beautiful buildings (36) Spectacular projects (Blavatnik, Physics Building) (1) Pushes boundaries in architecture (1) Historic Buildings/ History (71) University/College buildings (7) Mix of old and new buildings (14) Beautiful environment (9) Conservation Areas (1) Views (2) The fact that it is not built up with high rises & high density developments (1) Wide, open streets, lack of tall buildings (1) <u>Natural environment</u> Green spaces/setting - general (103) Mix of built and natural environments (19)	<u>Built Environment</u> Litter (3) Recent unsightly developments (12) ▪ more in-keeping with historical architecture (5) ▪ Ugly, Post-war buildings (1) ▪ Lack of resident input (2) Poorly maintained public areas (11) Too much concrete (1) Blocked pavements (2) More civic responsibility for their street (3) Railway station area is poor environmentally (2) Gloucester Green is unsightly (1) Central and north Oxford are attractive, the poorer south is neglected (1) Unattractive street furniture (1) More bin collections (1) Ugly wheelie bins (1) Not enough to bring communities together (1)

Proximity to the countryside (23) Green Belt (4) The benefits of the Green Belt in terms of visual amenity, recreation, health and well-being, together with the need to protect these benefits. Parks – university and local authority (36) Allotments (6) Rivers/canal (29) Flood plain retention (1) Wildlife/biodiversity (9) Trees (2) Port Meadow (10) Shotover (7) Christ Church Meadows (7) Lye Valley (5) Rock Edge (2) Cutteslowe Park (2) Hogacre Common (1) Bury Knowle (2) Headington Hill (3) South Park (7) Florence Park (1) Cowley Marsh Park (2) William Morris Sports Field (1) Botanical gardens (2) <u>General</u> Oxford is a compact city that has a green feel and a long, varied history. Many ancient buildings are still in everyday use. Its uniqueness, its greenness, the river and waterways, the historic built and natural environment	Poor street environment (1) Better solutions in powering the city (1) Conservation of historic buildings (1) Excessive noise pollution from emergency vehicles (1) Lack of seating in the centre (1) Council paving over in public spaces (1) <u>Natural Environment</u> More green trees/ areas (5) in city centre (2) Improved parks (1) Protect green areas while still developing (1) Paving over residential gardens (3) Lack of protection of natural heritage (1) Waterways ▪ Anti-social behaviour by the riverside (1) ▪ areas next to river should be promoted more (2) Traffic pollution (36)

City Centre

Respondents mentioned a number of likes and dislikes concerning the city centre:

Likes	**Dislikes**
The Covered Market (6) Gloucester Green Markets (2) Seasonal street markets (1) Castle Quarter (1) Cornmarket (2) High Street (2) Broad Street (3) St Giles (3) Radcliffe Square (1) New Inn Hall Street (1) Frideswide Square - new layout (2) Buskers (2) Accessible church towers (1) Trees (1)	More green areas in the city centre (2) Need more facilities/ investment (5) in estates (4) centrally (1) Need a concert hall and other culture spaces (2) Lack of safety in the centre at night (3) Excessive drinking in the centre in the evening (2) Improve recreational areas (1) More diverse city centre (1) Cuts to services and facilities (2) Cost of leisure centres/ activities (2) Protect community assets (1) Unsightly central areas (1) Make the Town Hall more accessible (1) Keep the centre historical – not Westgate centre (1) Too busy/overcrowded in the centre (3) too many tour groups and coaches (1)

Clean city centre (2) High City Centre Parking Charges (1) Mix of uses (1) Regeneration of run down areas (1)	

Retail

Respondents mentioned a number of likes and dislikes concerning the retail offer:

Likes	Dislikes
Range of the retail offer (3) Presence of major chain stores (1) Independent shops (5) Bookshops (2) Bikeshops (1) Blackwells (1) Boswells (1) Ducker's shop, Turl Street (1)	Increase retail in surrounding settlements – not Oxford (1) More modern shops (1) Poor retail (non-specified) (7) Clothing too expensive (1) More small / local retailers (12) More diversity in shops (4) Modern retail damaging the city (5) Opening hours of shops (office hours) make them harder to visit (1) More markets (1) Quality businesses – not tourist (5) Too many empty shops (3) encourage temporary uses (1) Alternative uses of these spaces (1) Not enough shops,better to go out of Oxford for shopping (1) Stop trying to make Oxford a retail centre (2) Constant closing of pubs (1) Too many non-retail shops (cafes,bars, hairdressers etc) (2) Too many mobile kebab serveries (1) Too many charity shops (1) Encourage district centres (1) More technology and business centre (1) Expensive shop rent in town (1)

Universities and Students

Some respondents consider the universities bring a variety of benefits to the city, others noted problems they see relating to them:

Likes	Dislikes
Mix – Town and Gown (2) A place of learning, research and innovation (4) A world class centre for education (7) Presence of Universities (9) University events/activities/continuing education (5) University provides an excellent working environment (1) Students: A very mixed and fluctuating population (3); The positive attitude they have (1). Impacts of universities/students on city atmosphere: During term time I love the buzz of a city engrossed in learning (1) I like how Oxford varies so much throughout the year. During the university holidays it feels like you own the city, and when the students are back, there is vibrant activity (1)	University owns too much land and had too much control (2) Lack of access through university land (1) More involvement/ better contribution to city (8) Get rid of the colleges (1) Planning blunders by the university – failure of planning control (2) Colleges need to be more open to residents of Oxford (5) university facilities more publicly accessible (2) More purpose-built student accommodation (3) Students should have to live outside ring road (1) Better student integration into the community (3) Limit number foreign students (1) Too many students - HMOs (1) Disjointed council-university relationship (2)

Oxford's economy and growth

Some respondents appreciated Oxford's world-leading position in science and technology, and the employment opportunities that exist. Others thought that growth was leading to overcrowding.

Likes	Dislikes
Employment/job opportunities (7) Variety of businesses (3) High skilled workforce (1) Oxford offers significant and growing opportunities for enterprise (1) Oxford is a historic City of great architectural and natural beauty yet is simultaneously a world-leader in science and technology.	Expansion beyond what the city can sustain (1) Don't need to expand as a city (7) o Growth at expense of quality of life (1) o No Room to expand (1) o Exacerbating housing problems (1) University blocking growth (1) Overcrowding (4) Green belt o Expand onto green belt (8) o Protect green belt (4) Over-emphasis on employment within the city (3) Improve infrastructure and services before expanding (2) Lack of progress hurting the city (2) Stop building on floodplains (1) Diversify employment opportunities (1) Pursue out of town developments (1) Opportunities to develop within the city (2) Redevelop disused buildings (1) New expansive development need more consideration before beginning – infrastructure (1) Pressure from council to build more houses and business (1)

Community/social

Many respondents commented positively about Oxford's diversity and community spirit, but others noted that there are social problems, particularly inequalities, across Oxford:

Likes	Dislikes
Diversity/multi-cultural (60) Oxford's people (interesting, educated, motivated) (14) Community spirit (6) Interest in common good (1) Engaged communities (1) Welcoming of refugees and those in need (1) History of social justice and workers' rights (Oxfam, Cowley union, two Muslim Mayors) (1)	Lack of funding in youth centres (3) More activities and places to socialise for children/ students (2) Poverty and the rich/ poor divide (15): Living wage (1); More balanced development (3) Beggars and homelessness (14): More shelters for the homeless (6); Need to move them on from the city centre (3) Anti-social behaviour (6) Crime (1) Traveller site in Kennington (1) Harassment by charity workers (1) Excessive immigration (1) Tourist buses making St Giles unsightly (1) Ensure tour groups register and are supervised (1) Try to segregate tourists and residents to make shopping easier for residents (1) Too many tourists (5) Too many large groups of tourists (3)

Travel and Transport

Many respondents appreciated the ability to move around the city by walking, cycling and bus. Good transport links to the rest of the county and internationally were also appreciated. However, many commented that transport around the city is one of the biggest issues in Oxford, in particular in terms of levels of connection:

Likes	**Dislikes**
Ability to cycle around the city (32) The large, very visible cycle park at the railway station wows first-time visitors and makes the best possible statement about our cycling culture in Oxford (1) Ability to walk around the city (9) Good public transport links (6) Good bus service within the city (frequent, comprehensive) (13) • Only on the main arterial routes (2) • the use of low pollution technology on the buses (1) • Good evening/night time services (1) • Having a free bus pass (1) Good bus links with wider Oxfordshire area (2) Good rail links (4) Central location, good links with the rest of England (11) Proximity /connections to London (9) Good bus links to London (7) Good bus links to the airports (6) Car clubs (1) Park and ride (2) Leadership on sustainable travel e.g. electric car provisions (1) Don't have to rely on a car (2) The 20mph speed limit (1)	Traffic/ congestion (83) ○ limit private cars/ encourage public transport (25) ○ too many / poor traffic lights (5) Too difficult to park (14) Too much parking (5) ○ surface level areas taken up by parking(2) ○ encourages cars (2) ○ Reduce visitor permits to residents (1) ○ increase price of permits (1) ○ Street parking on busy roads causes congestion (4) Improve links to the rest of the country (1) Poorly planned and laid out (1) Encourage active travel (7) Pedestrians and cars competing for space (3) Excessive and poor quality road works (10) Lack of maintenance on roads and pavements(4) Overcharging on the Park & Ride (5) Car Pool lanes (1) More Bus Lanes/ bus only zones/ park and rides (4) Better/ more comprehensive public transport (28) ○ rural links (3) ○ Too slow (5) ○ co-ordination of city services and single payment method (oyster) (3) ○ More bus routes (2) ○ Better advertising of public transport (5) ○ Public transport too expensive (6) ○ Cycle hire integrated with other travel systems (1) ○ Insufficient train station (4) Victimising car users (3) Pedestrianize the city centre (13) Too expensive to reach the centre (1) Trams or local railways lines (13) Infrastructure too in favour of motorists and not for pedestrians (5) More pedestrian footpaths (3) Need a congestion charge (7) New Ring Road away from residential areas (4) Too few west-east roads (1) Cars parked in places they shouldn't (1) Lack of safety on roads (1) Buses need to be less polluting (1) Park & Ride only benefits commuter – residents still need to drive in (1) Ban tour buses (1) Too much development without improving infrastructure (8) Lights favour pedestrians too much (1) 20mph speed limit/ speeding issues across Oxford (4) Improve facilities at Park & ride (1) Improve road system surrounding Oxford (2)

	Bus stop clogging the roads (2) Allow all residents a parking permit (1) **Cycling** Expansion of Cycle Lanes (20) More connectivity (8) Poor existing design (8) Cycle lanes segregate from traffic and pedestrians (25) Aggressive cyclists (2) Parked Bicycles blocking footpaths (1) Cyclists disobeying traffic laws (1) Cyclists cycling into pedestrians (2) Lack of bike racks in town centre (8) Better protection of cyclists – dangerous cycle routes (12) Driver attitude to cyclists (2) Improve and promote existing cycle lanes (15) potholes and street furniture (8) On street parking blocking cycle lanes (2) Cycling in the centre during out of bound hours (1) Subsidised Cycling equipment (1) Dislike how Queen street does not allow cycling In the day (1) Poor sign posting for cyclists on the road (2) Oblige cyclists to use cycle paths/ lane (1) More one-way systems to free up space for cyclists (2)

Politics, Local Government and Leadership

Various comments, both negative and positive, were made on this subject:

Likes	Dislikes
Liberal politics (1) Labour/Green Council (1) A council that is trying to engage meaningfully with people (1) Council that values culture (1) Pushes boundaries in social policy (1) Responsive and good city council (1) Strong political leadership (1) Tolerant and forward thinking politics seeking to protect and house the most vulnerable (1) Political openness (1) Pro-public transport policies (1) Serious about tacking pollution (1) Good recycling service (2) Good public services (1) Low Carbon Oxford (1)	Failure of local government to get things done (2) NIMBYism (1) Overlapping council & responsibilities and disjointed relations (4) More efficient services needed (2) Funding grievances (1) Residential wishes overridden (1) Dissatisfaction with the planning system (5) ○ Piecemeal developments with no overall strategy absence of a clear vision for the city(3) ○ People's wishes ignored (1) ○ Rejection of interesting developments (1) ○ More input and decision making by local people (1) ○ Inappropriate planning decisions regarding extensions (1) Education ○ Schools in Oxford poor (8) ○ Unable to attract teachers (1) ○ Best students being creamed off by private schools (1) ○ New schools need to have the effects of its creation properly looked into – congestion (1) ○ City Council should take over management of education (1)

The 'feel' of the city

Many respondents had positive comments to make about the 'feel' and atmosphere of the city:

Likes
General atmosphere, non-specified (2) Vibrant (7) Exciting (1) Full of life (1) Youthful (4) There is a real buzz around the city (1) Noise of people (1) Cosmopolitan (8) International (9) Pleasant + relaxed, except in city centre during tourist season (1) Tranquillity (1) Civilized (1)

Unique (2)
Innovative (1) Creative (1) Progressive (1) Science oriented (1)
Changing/improving/regeneration (3)"Oxford is on the crest of a wave of change, which is very exciting to bring my children up in" (1)
Cultural openness (1) Accommodating (1) Liberal (2) Open minded people (1) Openness (1)
Friendly (4) Convivial (1) Nice people (1)
Alternative culture (1)
Safe (6) Safe at night (1) Safe environment for and students (1)
Clean (1)
Compact/small (17)

- Not too big or busy (2)
- I can go out and about and nearly always bump into someone I know (2)
- Feeling at home (1)
- With lots of history that can still be seen and felt everywhere (1)
- yet it has a huge amount going on (1)
- But has worldwide reputation (1)

Generally a good place to live/work (2)
The social, cultural and 'green' environmental conditions, supported by a successful economy.

Many respondents said that they like the green, quiet suburbs (4) and the different characters of urban villages (12), their local facilities (6) and their history (1). The following centres were mentioned positively:

- Cowley Road (12)
- Headington (4)
- Summertown (5)
- Temple Cowley (1)
- Marston (1)
- St Clements (1)
- Jericho (4)
- Need to develop a local centre for West Oxford/Osney (1)

Activities/facilities

Likes
Schools Good schools (7) Hospitals and Healthcare Quality of hospital healthcare provision (9) Wide variety of things to do (10) Community events and festivals were valued by 8: (Cowley Road Carnival (6); Open doors (1); Dance week (1); Alice's Day (1); Christmas lights (1); FloFest (1)) 30 mentioned the variety of cultural activities: Museums (22); Theatres (8); Outdoor theatre (1); Cinemas (7); Art galleries (5); Music venues/concerts (8) Restaurants (15); Cafes (5) Community centres (2) Children's centres (2) Libraries (6) Pubs (7) Church (1) Thames Valley PSO's based in St Aldates Police Station (1) General sports/leisure/recreation facilities (6) Oxford ice rink (1) Jordan Hill playing Field (1) Cycling clubs (1) Gyms (1) Swimming pools (1) outdoor swimming (1) Hinksey outdoor pool and park (1) SOAP (1) The little train and play area in Cutteslowe Park (1)

Housing

Dislikes
Housing is too expensive (60) ○ More housing (14) ○ increased density (8) ○ Taller buildings (3) ○ Less (student) HMOs (5) Purpose built students housing (4) ○ Restrict buy-to-lets (2) ○ More social/ affordable housing (5) ○ More housing for key workers (10) Dislike term 'key workers' (1) ○ More protection for tenants (1) ○ Restrictions on second homes (2) ○ Increase council tax on expensive properties (1) ○ Promote Shared Housing (5) ○ Poor quality/ poorly conceived housing extensions (3) ○ Houses on stilts (2) ○ More self-builds (6) ○ Lack of support for young professions, especially on short term contracts (1) ○ Community led housing schemes (1) ○ Cost of housing means a failure to retain skilled workers (1) Poor quality housing (11) Less luxury developments (1) Better housing mix across Oxford (3) Poor connectivity (1) Build housing outside of Oxford (1) More purpose built housing for the elderly (1) More subsidised housing (1) Dislike the 'sprawling suburbs' (1) Move retail outside of Oxford to make way for housing (1) Transient tenants effecting the sense of community (2) High density housing produces too much traffic (1) More eco-friendly housing (1) Need to consider parking in new housing developments (1) Too focused on employment (2) More mooring for houseboats (1)

• Summary of 'additional comments' received through the paper and online questionnaires

Travel Infrastructure

- Road Maintenance
  - Condition of roads need to be improved (3)
    - Drains on roads poorly maintained (1)
    - Favour gravel over paving to improve drainage (1)
  - Road Works
    - Restriction how many road works can take place simultaneously (1)
    - More aesthetic consideration when repairing public surfaces (1)
    - Time limit on road works (1)
- Traffic Management
  - Too much traffic (8)
  - Lack of rising bollards (1)
  - Parking

        - Dislike of current parking system (2)
        - Restrict parking (1)
        - Lack of parking (4) causes traffic (1)
        - More short stay parking (2)
        - Drop-Off zone in the town centre (1)
        - Ban drop off zones around schools (1)
        - Affordable parking (2)
        - Issues with hospital parking (visitor and staff) (1)
        - Some roads should be 'no parking at any time' – Hollow Way (1)
        - HMO's causing parking issues – punish households with more than two cars (1)
        - Permit parking across the whole city (1)
        - Maximise car club parking (2)
        - Protect disabled parking (1)
        - More underground parking (2)
    - Planning and traffic
        - Need new houses which forbid car ownership (1)
        - Need to keep thinking about the infrastructure (1)
        - Lack of long-term planning for traffic (1)
            - Plan for the invention of driverless cars (1)
            - Replace all traffic in the town centre with a fleet of self-driving taxis (1)
        - Divinity and Southfield Roads should be a one way system (1)
        - Stricter speed limits (3)
        - Make sure new estates have good transport infrastructure (1)
        - Discourage private cars (4)
        - Introduce a boat commuting service (2)
        - Innovative new ideas needed to help traffic (2)
    - Arterial roads too busy (1)
    - Traffic enforcements (rat-run through Marston Village) (1)
    - Improve major roads surrounding Oxford (1)
    - Plan traffic to favour buses, cyclists and pedestrians (2)
    - Delivery lorries causing problems in central Oxford (2)
    - More Zip Cars (1)
    - Police need to take a greater interest in road safety (1)
    - More car sharing (2)
    - Businesses more accountable for the traffic they cause (1)
    - Reduce the need for travel (1)
    - Inefficient and poor taxi service (1)
    - De-pedestrianize the town centre (1)
    - More pedestrianisation in the centre (3)

- Public Transport
    - Bus Specific
        - Too many buses on major routes (1)
        - Better bus connections in Oxford(8)
        - Better bus connections to nearby towns (2)
        - Electric buses (1)
        - Emphasis on the importance of buses (2)
        - Bus companies need to be more concerned with social matters than money (2)
        - Buses should be allowed in the town centre (3)
        - Move bus depot from the town centre (1)
        - More Park and Rides (1)
        - More Bus lanes (1)
        - Stop taxis using bus lanes (1)
        - Buses more accessible for prams (1)
        - Allow motorcycles to use bus lanes(1)
        - Park and rides in nearby towns will not help traffic (1)
        - Use Park and Ride centres as centres for economic activity (1)

        - Free Bus passes to under-18s (1)
        - Use of electric buses needs thinking through – charging infrastructure (1)
        - Re-consider the 'joined-up' transport hub at Oxpens (1)
        - Better Bus information (1)
        - Free electric buses paid for by doubling the parking charge (1)
        - Re-think the bus monopoly in Oxford (1)
    - Rail-specific
        - Extend the railway network(5)
            - Better local network e.g. to Witney (3)
            - Better connection to the national network (2)
        - Electrification of railway will increase the commuter population (1)
        - Improve Oxford station (2)
        - More train links within Oxford (1)
        - Oxford Parkway was a success – more out-of-town transport (1)
    - One/ better payment system for public transport (3)
    - Encourage public transport for pupils (1)
    - Reduce cost of public transport (1)
    - Need easy connection to the airports (1)
    - Gloucester Green depot needs upgrading (1)
    - Need to strategize our traffic plans with county (1)
    - Free public transport for over 60s (1)
    - Need new rail and bus station in Oxpens development (1)
    - Oxford requires a tram system (4)
- Cycling and Walking
    - More/ better cycle ways (6)
        - Improved cycle links to Park and Rides (1)
    - Safer cycling routes needed (2)
    - Cyclists not observing the highway code (1)
    - Segregate cycling and pedestrian lanes (2)
    - Extend the cycle hire system (1)
    - Widen paths by the river to accommodate cyclists (1)
    - More footpaths connecting green spaces (1)
    - Remove bicycle traps (1)
    - Bike sharing would be appreciated (1)
    - More bicycle parking (4)
    - Cycle parking should be a pre-requisite for new developments (1)
    - Need a pedestrian map of Oxford (1)
    - There have been many recent improvements for cyclists – keep going (1)
    - Delivery service via bicycle (1)

Universities

- Expansion of the universities
    - Don't allow university facilities to take over (1)
    - No room for the universities to expand anymore (2)
    - University should be required to improve the public sector if it wants to expand (2)
- Influence of the universities
    - Oxford University has a massive say in a lot of decisions (1)
    - Ban the University from sitting on council committees (1)
    - The university should be the principal driver for all development decisions (1)
    - Too many students congesting the city centre (1)
    - University has a stranglehold on Oxford (1)
    - University should contribute to improving energy efficiency (1)
- Student Accommodation
    - A great need for more student accommodation (2)
    - Move student housing outside the ring road (1)
    - Universities should build their own accommodation (1)
    - Brexit may alleviate the student housing problems (1)

    - Shouldn't be allowed to accept more students if there is no more accommodation (1)
    - Clear out City Council offices at St. Aldates to make way for student housing (1)
    - Need to do more to help students – the cap on HMOs has only increased rent (1)
- Integration
    - Universities need to be more integrated with Oxford (2)
        - Try to engage more with the students (1)
    - Encourage university to be more open (also facilities) to residents (2)
    - Should do more in local outreach projects (1)
    - Joint developments with the university should be explored (1)

Education/ Youth

- Children and parents ought to be involved with planning (1)
- Fight obesity by encouraging cycling to school and other activities (1)
- Have the large private schools release some of their land for housing (1)
- Schooling
    - Improved schools (1)
    - More Schools (3) Rather than expanding existing schools (1)
    - Better education opportunities for all (2)
    - Local education – not commuting to school (1)
    - Dislike the struggle to attract teachers (1)
    - Education could help improve deprived people/areas (2)

Community and Well-Being

- Community
    - Need good local communities (3)
    - Need a stronger Oxford identity across the city (1)
    - More public events (1)
    - Accessible mediation for neighbour disputes (1)
    - Work in partnership with local social enterprises and universities (1)
    - Needs to solve the social issues/tension it has (2)
    - Oxford is no longer a good place for the elderly (1)
    - Stop allowing historic pubs to change their name (1)
    - Youth of today have it too easy (1)
    - Larger police presence in the town centre (1)
- Government
    - Establish Parish councils for districts which lack a structure (1)
    - More cooperation with other councils (4)
    - Needs closer partnership with churches (2)
    - Need a unitary authority (3)
    - More value for money from the council (1)
    - OCC is destroying Oxford (1)
    - Need a strategy to keep Oxford in the EU despite Brexit (1)
    - Better advertising of OCC services (1)
    - OCC is doing a great job (2)
    - Difficulty in arranging a discussion about planning with councillor (1)
    - Lack of transparency (1)
- Diversity
    - Enjoy the multi-cultural nature of Oxford (2)
    - Support a mix of cultures through twinning and collaboration (1)
    - Minimise public spending on minority interests (1)
    - Encourage communities to adopt Oxford ideals and British values (1)
    - Best thing about Oxford is its diversity – keep it this way (1)
- Inequality
    - Poverty in Oxford (3)
    - Massive class divide in Oxford (2)

    - Discrimination and racism in Oxford (1)
    - Some districts of Oxford feel neglected (3)
    - More support for the homeless (6)
    - Remove homeless people and monitor begging more (1)
    - Clear focus on helping all sections of the community (2)
- Well-Being
    - Traffic Pollution issues (11)
        - More bold action about pollution – close roads (1)
        - Public need more authority to deal with pollution (1)
        - More trees (1)
        - Need to address this before developing (1)
        - Low emission zones (1)
    - Bin collection too infrequent (2)
    - Improve healthy food accessibility and affordability (1)
    - Need to limit anti-social behaviour (3)
    - Remove all charges for Redbridge recycling centre (1)
    - Improve access to healthcare (1)
- Community Facilities
    - Need more support for community centres (1)
    - Don't concentrate facilities in the town centre (1)
    - More facilities and activities for the elderly (1)
    - Public libraries and street furniture is run down (1)
    - Prioritise public furniture, equipment etc over cars in residential streets (1)
    - Protect facilities (1)
    - Create more facilities (1)
        - More adult outdoor exercise facilities (3)
        - More facilities for the youth (5)
        - Need a concert hall (1)
    - Total lack of clean public toilets in central Oxford (1)
    - Problems with OCC swimming pools (1)
    - More art in the centre of Oxford (1)
    - People only care about community assets when they are about to be lost (1)
- Environment
    - Enjoy the amount of green space (1)
    - Need a better connection to the river (1)
    - Need more public spaces (2)
    - Lots of great public spaces but they aren't used well (1)
    - Need more dog parks, separate from children playing etc (1)
    - Pedestrian areas tacky and open to traffic fumes (1)
    - Need cleaner streets (2)
    - Some pavements need widening (2)
    - Thank you for taking care of the green spaces (1)
    - Turn off traffic lights from 11pm to 7am to save electricity (1)
    - Better maintenance on green space and greenery (1)
    - Better wildlife conservation – protect SSSI sites (1)
    - Improved tracking and prosecution of illegal dumping (1)
    - Do not make recycling sites harder to access (2)
    - Make all new developments have sustainable energy plans (1)
    - Glad to see some solar panels but need wind turbines (1)
    - Use hedges instead of fences (1)
    - More eco developments (5)
    - retrofitting old buildings to make them more eco-friendly (1)
    - OCC should have the highest eco-building standards (1)
    - Need public access to private green spaces (2)

Housing

- Affordable/ social housing
    - Make developers provide more social housing (3)
    - Need to provide affordable/ social housing (12) with adequate services (1)
    - Families who outgrow their social housing should be moved to larger ones (1)
    - Stop sale of social housing (1)
    - Social housing with unused bedrooms should be downsized (1)
    - Use prefabs to make cheaper housing (1)
    - Need to make sure housing goes to local people who need it (2)
- Key workers
    - Oxford too expensive for key workers (2)
    - Should not build housing solely for key workers but have a better housing policy all round (1)
    - Definition of key worker must be expanded to those who are paid less(2)
- Where to build more housing
    - Need more housing (7)
    - More housing outside the ring road (2)
    - Housing crisis will not be solved solely by building more houses (1)
    - Build dwellings/ businesses in back gardens (1)
    - Do not destroy Oxford by building business and houses inside the green belt (2)
    - Available building land should solely be used for housing, not further employment (1)
    - Forbid the building of expensive housing (1)
    - Need more purpose built housing for the elderly (1)
    - Encourage large North Oxford properties to convert into flats (1)
    - Don't build more poor quality and ugly houses (1)
    - Should the council support self-build? – very slow to build (1)
    - Ban basement projects (1)
    - Encourage basement building (1)
    - Prioritise housing over retail and employment (5)
    - Redevelop existing housing areas to make them more dense (1)
- Landlords
    - Stop buy-to-let landlords (1)
    - Scrap the HMO license (1)
    - Stricter HMO licenses (1)
    - Licensing all private landlords (1)
    - Council should not pay high rents to private landlords (1)
    - Ceiling on rent should be introduced (1)
- Developers and housing
    - Housing should be in public, not developer interest (1)
    - Responsibility of developers (non-specified) (1)
    - Need taller housing (2)
- Price of housing
    - Housing expensive but wages not weighted (1)
    - Increase council tax for some (1)
    - Cannot afford a family home (1)
    - More affordable homes for the elderly (1)
    - Need more houses to attract young people (2)
    - People have to leave the city to buy (1)
    - Houses are expensive because sellers can get away with prices, not because they are expensive to build (1)
    - Being pushed out by high rents and the cost of living (1)
    - Promote cohousing and coop housing (2)
    - In reality 'affordable' housing in Oxford is still very expensive (1)
    - High council tax (1)

Future of Oxford

- Growth
    - Size of Oxford
        - Enjoy it being small (2)
        - Too overpopulated (5)
            - Focus development in led full places (1)
            - The bigger the population the more problems Oxford has (2)
            - Need a population limit (1)
        - Historic sites cannot cope with new population (1)
        - Want to see it shrink a bit – it's a country town (1)
        - Need to stop growth of any kind due to climate change (1)
        - Growth should be on an appropriate scale (3)
        - Dislike the growth imperative (1)
        - Need to evaluate growth vs sustainability (1)
        - Push for economic growth wrong (1)
        - Current level of growth unacceptable (3)
        - Nearby towns should grow, not Oxford (1)
- Development
    - Building Quality
        - Sensitive development needed (2)
        - High architectural quality in new buildings (3)
        - More creative in Building new business and living spaces (1)
        - Oxford needs to retain its character (5)
        - No more poor quality/ ugly developments (2)
        - Oxford is boring (1)
            - Should be more influenced by European cities (1)
    - Floodplains
        - Consider what farmers upstream grow to control flooding (1)
        - Encourage environment agencies to dredge the river (1)
        - Need to build on floodplains with floating steel structures (1)
        - Should not develop the floodplain (3)
        - Need to fund and follow the Oxford Flood Alleviation Plan (1)
        - Need more flood protection (1)
        - Excavate parts of the flood plain for elevated housing (1)
    - Preservation
        - History must be preserved (2)
        - Green space must be preserved (10)
        - Green Belt must be preserved (5)
        - If we build on the green belt we must find a way of incorporating lost vegetation (3)
        - Continual desire to build on all available green space and historic buildings (1)
        - Loss of green space acceptable if there were proper improvements (1)
        - Rather build on farmland than increase the density too much (1)
        - Council Staff destroying the Town Hall (1)
        - Conservation status has not helped protect areas (1)
        - Ancient forests rightly have same protection status as buildings (1)
    - Employment
        - More employment hubs (1)
        - Move employment sites to more suitable settlements (1)
        - Mover employment hubs to the outskirts of Oxford (1)
        - More Employment in Oxford will exacerbate problems (2)
        - Encourage start-up businesses in Oxford (2)
        - Should not protect key employment sites – respond to market (1)
        - Should allow all employment sites to be redeveloped as housing (2)
        - Encourage employment which pay unskilled workers a good wage (1)
        - Too many commuters in Oxford (1)
    - Development Policy

        - Create more walkable neighbourhoods (1)
        - Planning for development should be beyond formal borders of Oxford (1)
        - This might all be overdevelopment – Brexit (1)
        - City is stuck in the 1960's or 70's (1)
        - Oxford too hesitant in development – be brave (3)
        - Should keep development inside the greenbelt (1)
        - New town development needed – not just splodges added on (1)
        - Too much development in areas with not enough services (4)
        - Better cooperation to minimise self-interest in development (1)
        - Better integration and coordination across Oxford's developments (1)
        - Improve energy efficiency (1)
        - Oxford is pursuing a policy of 'Golden Bricks' (1)
        - Favour brownfield over greenfield sites (1)
        - Encourage mixed use developments (1)
        - Need better internet connectivity (2)
        - Oxford should be interesting and innovative (2)
    - Land use
        - Hospitals be taller, freeing up land for housing (1)
        - Paving over land is causing flooding (2)
        - Churchill should not expand until Southfield golf course is developed (1)
        - Open spaces needed (1)
    - Who should lead development?
        - Community led development (1)
        - Development should not be driven by developers (1)
        - Help communities draw up their own local plan (1)
        - Greater input by communities (1)
    - Specific Developments
        - Dislike the Northern Gateway Project (2)
        - Want speedway and greyhound track back (1)
    - Regeneration
        - Need to regenerate areas without driving people out with increased prices (1) – Black Bird Leys
    - Resulting traffic
        - Creating even more employment in Oxford without address the traffic (1)
        - Any new hotels should be on the outskirts to help traffic (1)
        - Cannot justify further development unless it is to reduce traffic (1)

Tourism

- Tourist Activities
    - So much to see and do in Oxford (1)
    - Visiting groups have a bad attitude and need guidelines (1)
    - Should preserve history for tourists, not turn Oxford into a theme park (1)
- Levels of Tourism
    - Overdevelopment may destroy tourism in Oxford (1)
    - Visitors to Oxford are important and should be protected (1)
    - Too many tourists (6)
        - Have we reached the point where we cannot accommodate any more? (1)
        - Limit their numbers (1)
        - Need to balance the needs of tourists and the needs of residents (1)
- Tourist Information
    - Create a guide of historic sites – like Basingstoke (1)
    - Tourist information centres shouldn't run its own tours – favour independent tour guides (1)
    - More electronic/ mobile interactive information (1)
    - Develop trails (1)
    - Promote Oxford more as a centre of culture (1)

Business and Retail

- Retail
    - Need affordable rent on retail units for independent retailers (3)
    - Not enough useful shops and too many coffee shops and restaurants (2)
    - No proper shops – city centre turning into a theme park (1)
    - Black Bird Leys lacks a range of shops and eateries (1)
    - Maintain a good mix of quality shops (1)
    - Westgate development should have dedicated areas for local retailers and restaurants (1)
    - Encourage street markets bringing in healthy food (1)
    - More shops selling essential, everyday items (1)
    - Covered market needs investment (1)
    - More continental feel to cafes – outside eating (2)
- Industry
    - Focus on science and education, not industry (2)
    - Don't oppose future nuclear power station at Didcot (1)
- Commercial Development
    - Commercial developers should set up in neighbouring towns (1)

Planning

- Planning Policy in general
    - Tougher approach to planning (1)
    - More flexibility in planning (1)
    - Planning for the past twenty years has been very poor (1)
    - Poor use of assets (2)
    - Consider what other cities are doing (1)
    - Lots of careful forethought needed before plans are enacted (1)
    - Objections to OCC projects are ignored anyway (1)
    - Improving one thing can lead to the deterioration of another (1)
    - Read Oxford Civic Society newsletter (1)
    - Improvements needed in the town centre (1)
- New Local plan
    - Plan includes clear criteria (1)
    - Like what they have seen (2)
    - Should have a chapter on supporting local food (1)
    - Ratio of 5.75ha of public space per 1000 population should be maintained (1)
    - Draft Headington local plan should be incorporated into the new local plan (1)
    - Neighbourhood plans should be respected (2)
    - Needs to be a single overarching plan – not things in isolation (1)
    - Oxford's plan should consider the context of the country as a whole (1)
    - More involvement from other professionals in the plan (1)
    - Keep what is best and alter the rest (1)

Hotels

- The new Local Plan should allow greater flexibility for change of use from hotel use

Flooding

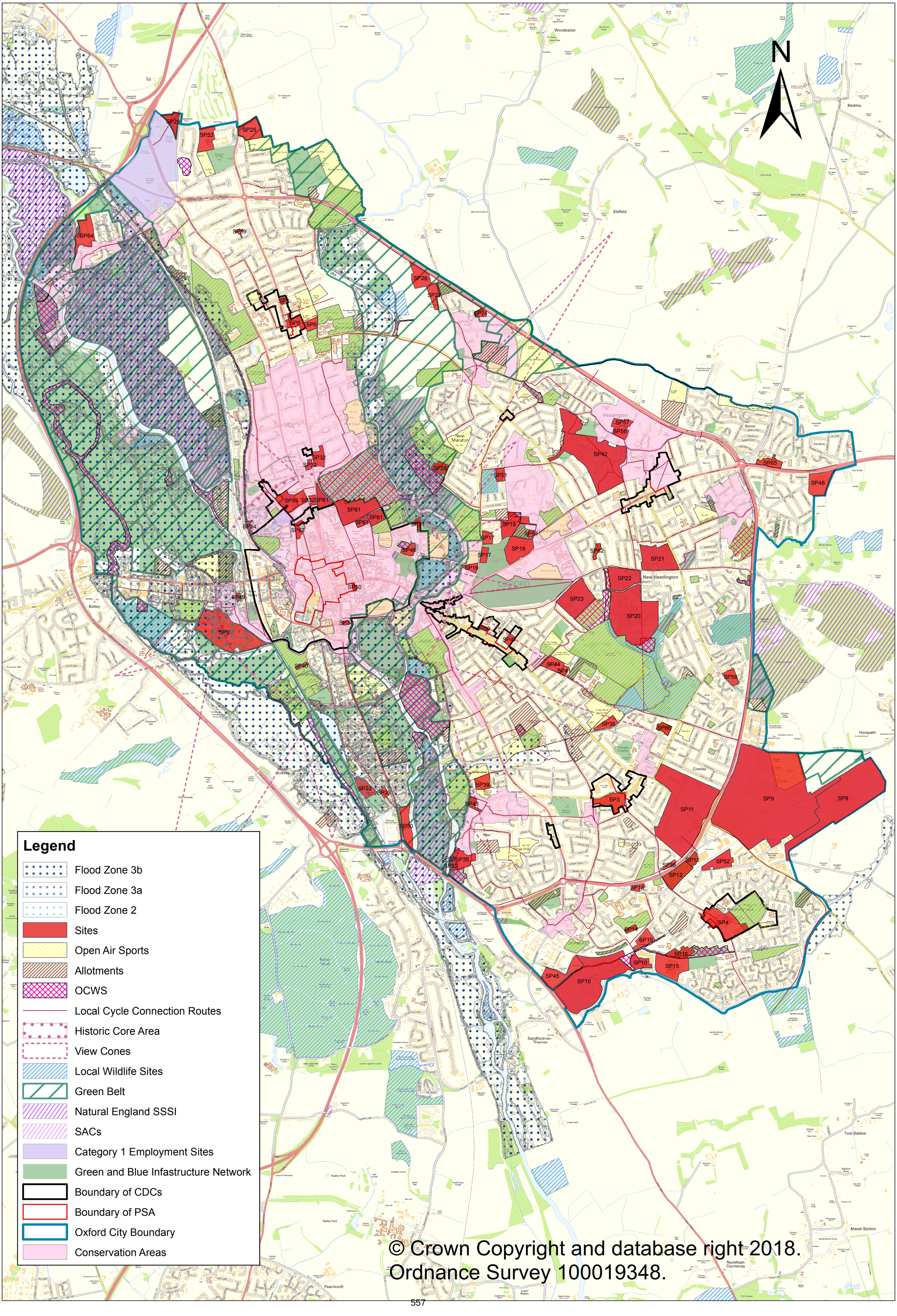
- A combination of sluice management, drain cleaning, ditch clearance and localised pumping would be an extremely cost effective approach over the long term. Establish a dedicated Conservancy or Trust to take responsibility for water management. SFRA needs to include the updated climate change allowances Local Plan should apply a sequential, risk-based approach to the location of development to avoid flood risk Increase the scope of the Strategic Flood Risk Assessment to a level 2 SFRA
- The potential for the Western Conveyance Channel should be acknowledged and investigated.
- Counter the pressure to develop areas of higher flood risk, and take measures to reduce the dwellings at risk of flooding.

Ecology

- Local plan should reflect the aim of the WFD of achieving good ecological classification in the city's waterbodies.
- The Lye Valley needs policies for its safeguarding
- The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites.

General comments on preparation of new Local Plan

- The preparation of a new Local Plan to replace the variety of documents that make up the Local Plan currently is to be welcomed
- The preparation of a post-NPPF plan is to be welcomed
- As the period extends to 2036 the City will need to identify its objectively assessed housing need to cover that period. Specific consultation exercises should be held with developers and land owners, to identify barriers to housing supply
- We continue to support the West End being treated as a strategic allocation. The approach to dwelling mix and typology in the West End should be re-considered
- Appropriate water services infrastructure should be in place. Set a water consumption limit of 105 (l/h/d) for residential development. Ensure developing land affected by contamination will not create unacceptable risks
- Establish a standard of green space provision
- Local Plan policies should regard the impact of the unprecedented scale of institutional development in Headington in recent years
- Local Plan should subsume policies set out in the Headington Neighbourhood Plan, demonstrate how its historic evidence base has informed and influenced the Plan's policies and site allocations, conserve, improve access to and enhance the historic environment, contain an overarching strategic policy to deliver the conservation and enhancement of the historic environment. Local Plan should also demonstrate how the historic environment has influenced its choice of sites, encourage tree planting, make implicit reference to the need for development and transport planning to be completely integrated, encourage sustainable buses or rapid transport. Provision needs to be made for sufficient volume and range of quality of hotels, other accommodation, recreational facilities and transport arrangements. The Local Plan needs to recommend how the public realm can be improved
- The City Council achieve a balance between jobs and housing that is currently lacking. There is no reference to the role of the Green Belt in encouraging urban regeneration
- Introduce a Supplementary Planning Document that supports community enterprise including house building
- The Local Plan should set a requirement and programme for site specific SPDs or AAPs, in areas of major development/change. It is important that the impact of future development has the ability to be mitigated and that any infrastructure requirements are funded by developments individually
- Re-providing some appropriate open space and sports facilities from within the city boundaries to the green belt could free up land for housing. We remain extremely concerned that the plan-making programme could ultimately delay the provision of housing. (South Oxfordshire and Vale of White Horse District Councils)
- Consider whether a shorter timetable to adoption is possible
- Believe in the permanence of the Green Belt not increased urban sprawl. Planning for continuation of Park & Ride is simply antiquated.
- A specific Policy on water and sewerage infrastructure, within the New Local Plan, is required. Either carry forward the wording as set out in Policy CS17 or alternatively include suggested policy wording and supporting text
- Preparation of the new Local Plan provides the opportunity to incorporate Local Enterprise Zones and Local Development Orders to encourage economic activity
- Need to make radically better provision for interchange between cycling and buses services, and between different bus routes
- Would like to see a policy to establish a standard of green space provision linked to population which is similar to the current Policy CS 21 in the Oxford Core Strategy
- Would like to see the Local Plan retain the Oxford Urban Village model



Legend

- Flood Zone 3b
- Flood Zone 3a
- Flood Zone 2
- Sites
- Open Air Sports
- Allotments
- OCWS
- Local Cycle Connection Routes
- Historic Core Area
- View Cones
- Local Wildlife Sites
- Green Belt
- Natural England SSSI
- SACs
- Category 1 Employment Sites
- Green and Blue Infastructure Network
- Boundary of CDCs
- Boundary of PSA
- Oxford City Boundary
- Conservation Areas

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