Agenda

Cabinet

This meeting will be held on:

Date: **Wednesday 18 June 2025**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

For further information please contact:

Dr Brenda McCollum, Committee and Member Services Officer, Committee Services Officer

01865 252784 DemocraticServices@oxford.gov.uk

Members of the public can attend to observe this meeting and.

- may submit a question about any item for decision at the meeting in accordance with the Cabinet's rules
- may record all or part of the meeting in accordance with the Council's protocol

Details of how City Councillors and members of the public may engage with this meeting are set out later in the agenda. Information about recording is set out later in the agenda and on the website

Please contact the Committee Services Officer to submit a question; to discuss recording the meeting; or with any other queries.

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All public papers are available from the calendar link to this meeting once published

Cabinet Membership

Councillors: Membership 10: Quorum 3: No substitutes are permitted.

Leader/ Chair

Cabinet Members

Councillor Susan Brown	Leader, Partnership Working
Councillor Ed Turner	Deputy Leader (Statutory) - Finance and Asset Management
Councillor Lubna Arshad	Cabinet Member for a Safer Oxford
Councillor Nigel Chapman	Cabinet Member for Citizen Focused Services and Council Companies
Councillor Alex Hollingsworth	Cabinet Member for Planning and Culturey
Councillor Chewe Munkonge	Cabinet Member for a Healthy, Fairer Oxford and Small Business Champion
Councillor Anna Railton	Cabinet Member for a Zero Carbon Oxford
Councillor Linda Smith	Cabinet Member for Housing and Communities

Apologies received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting.

Agenda

Items to be considered at this meeting in open session (part 1) and in confidential session (part 2).

Future items to be discussed by the Cabinet can be found on the Forward Plan which is available on the Council's website

Pages

1 Apologies for Absence

2 Declarations of Interest

3 Addresses and Questions by Members of the Public

4 Councillor Addresses on any item for decision on the Cabinet agenda

5 Councillor Addresses on Neighbourhood Issues

6 Scrutiny Reports

The Scrutiny Committee will meet on 10 June 2025 to consider the following items. Report and recommendations arising from the meeting will be published as a late supplement.

- Leisure Investment Programme Update and More Leisure Service Annual Plan
- Oxford Local Plan 2042 Regulation 18 Consultation Document
- Annual Complaint Performance & Service Improvement Report

7 Leisure Investment Programme Update 11 - 54

Lead Member: Cabinet Member for A Healthy Oxford (Councillor Chewe Munkonge)

The Director of Communities and Citizens Services submitted a report to update Cabinet on the highlights of the first year of the new leisure contract and approve the Annual Service Plan 2025-26, which is an annual requirement of the operator, aiming to align outcomes to the Council's priorities and to address health inequalities.

Cabinet is recommended to:

Approve the Leisure Annual Service Plan 2025-26.

8	**Oxford Local Plan 2042 Regulation 18 Consultation Document** **Lead Member:** Cabinet Member for Planning (Councillor Louise Upton) The Director of Planning and Regulation submitted a report to request that Cabinet approve the First Draft Oxford Local Plan 2042 (Regulation 18 consultation) Document for consultation. It is a Plan which is looking to accelerate the move to zero carbon building standards and continues to see housing delivery as a priority whilst ensuring we deliver a mixed and inclusive economy. Cabinet is recommended to: 1. **Approve** the First Draft Oxford Local Plan 2042 (Regulation 18 Consultation) document for public consultation; 2. **Authorise** the Director of Planning and Regulation to make any necessary minor editorial corrections to the documents and the supporting evidence base prior to going out to consultation.	55 - 862
9	**Annual Housing Complaint Performance & Service Improvement Report** **Lead Member:** Councillor Linda Smith The Director of Housing submitted a report to seek the approval of the Annual Complaint Performance & Service Improvement Report (Landlord Services) 2024/25. Cabinet is recommended to: 1. **Agree** the content of the Annual Complaint Performance & Service Improvement Report (Landlord Services) 2024/25 in Appendix 1. 2. **Provide** a formal response to the Annual Complaint Performance & Service Improvement Report 2024/25.	863 - 934
10	**Disposal of City Centre Commercial Property**	935 - 954

Lead Member: Councillor Ed Turner

The Director Property & Assets submitted a report to seek approval for the long leasehold disposal of 9, 10, 16a & 16b Ship Street and 10 St Michaels, properties owned by the City Council.

Cabinet is recommended to:

1. **Approve** the long leasehold disposal of 9, 10, 16a & 16b Ship Street and 10 St Michaels these properties as set out in the report.
2. **Delegate** authority to the Director Property & Assets in consultation with the Deputy Leader and Cabinet Member for Finance & Asset Management, the Director of Law, Governance & Strategy and the Group Finance Director the agreement of the detailed terms for the disposal and to enter into all necessary documentation to effect the disposal on the basis that the terms comply with s.123 of the Local Government Act 1972, where powers are not already delegated within the constitution.

11 Adopt the revised Community Infrastructure Levy

955 - 990

Lead Member: Councillor Louise Upton

The Director of Planning and Regulation submitted a report to ask Cabinet to recommend to Council the approval of the Partial Review of the Community Infrastructure Levy Charging Schedule.

Cabinet is recommended to recommend to Council:

1. **Adopt** the CIL Charging Schedule in line with the recommendation of the independent examiner as set out in Appendix 1; and
2. **Approve** the date on which the amended tariffs will come into effect.
3. **Delegate** authority to the Director of Planning and Regulatory to make any necessary further minor changes to the documents or any minor change to the implementation date for the new CIL rates.

12 Positive Action Policy

991 - 1018

Lead Member: Councillor Nigel Chapman

The Diversity and Inclusion Specialist submitted a report to request that Cabinet agree to the proposed Positive Action Policy.

Cabinet is recommended to:

1. **Approve** this policy to go forward to Council for approval, publication and use.

13 Minutes

Recommendation: That Cabinet resolves to **approve** the minutes of the meeting held on 9 April 2025 as a true and accurate record. Minutes to follow the publication of the agenda as a supplement.

14 Items raised by Cabinet Members

15 Dates of Future Meetings

Meetings are scheduled for the following dates:

09 July 2025

13 August 2025

17 September 2025

All meetings start at 6.00 pm.

Matters Exempt from Publication

If Cabinet wishes to exclude the press and the public from the meeting during consideration of any of the items on the exempt from publication part of the agenda, it will be necessary for Cabinet to pass a resolution in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 on the grounds that their presence could involve the likely disclosure of exempt information as described in specific paragraphs of Schedule 12A of the Local Government Act 1972.

Cabinet may maintain the exemption if and so long as, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Part Two – matters exempt from publication

Information for those attending

Recording and reporting on meetings held in public

Members of public and press can record, or report in other ways, the parts of the meeting open to the public. You are not required to indicate in advance but it helps if you notify the Committee Services Officer prior to the meeting so that they can inform the Chair and direct you to the best place to record.

The Council asks those recording the meeting:

- To follow the protocol which can be found on the Council's website
- Not to disturb or disrupt the meeting
- Not to edit the recording in a way that could lead to misinterpretation of the proceedings. This includes not editing an image or views expressed in a way that may ridicule or show a lack of respect towards those being recorded.
- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

Members' Code – Other Registrable Interests

Where a matter arises at a meeting which directly relates to the financial interest or wellbeing** of one of your Other Registerable Interests*** then you must declare an

interest. You must not participate in discussion or voting on the item and you must withdraw from the meeting whilst the matter is discussed.

Members' Code – Non Registrable Interests

Where a matter arises at a meeting which ***directly relates*** to your financial interest or wellbeing (and does not fall under disclosable pecuniary interests), or the financial interest or wellbeing of a relative or close associate, you must declare the interest.

Where a matter arises at a meeting which affects your own financial interest or wellbeing, a financial interest or wellbeing of a relative or close associate or a financial interest or wellbeing of a body included under Other Registrable Interests, then you must declare the interest.

You must not take part in any discussion or vote on the matter and must not remain in the room, if you answer in the affirmative to this test:

> "Where a matter affects the financial interest or well-being:
>
> a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
>
> b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest You may speak on the matter only if members of the public are also allowed to speak at the meeting."

Otherwise, you may stay in the room, take part in the discussion and vote.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

** Wellbeing can be described as a condition of contentedness, healthiness and happiness; anything that could be said to affect a person's quality of life, either positively or negatively, is likely to affect their wellbeing.

*** Other Registrable Interests: a) any unpaid directorships b) any Body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority c) any Body (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management.

How Oxford City Councillors and members of the public can engage at Cabinet

Addresses and questions by members of the public (15 minutes in total)

Members of the public can submit questions in writing about any item for decision at the meeting. Questions, stating the relevant agenda item, must be received by the Head of Law and Governance by 9.30am two working days before the meeting (eg for a Tuesday meeting, the deadline would be 9.30am on the Friday before). Questions can be submitted either by letter or by email (to cabinet@oxford.gov.uk).

Answers to the questions will be provided in writing at the meeting; supplementary questions will not be allowed. If it is not possible to provide an answer at the meeting it will be included in the minutes that are published on the Council's website within 2 working days of the meeting.

The Chair has discretion in exceptional circumstances to agree that a submitted question or related statement (dealing with matters that appear on the agenda) can be asked verbally at the meeting. In these cases, the question and/or address is limited to 3 minutes, and will be answered verbally by the Chair or another Cabinet member or an officer of the Council. The text of any proposed address must be submitted within the same timescale as questions.

For this agenda item the Chair's decision is final.

Councillors speaking at meetings

Oxford City councillors may, when the chair agrees, address the Cabinet on an item for decision on the agenda (other than on the minutes). The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one working day before the meeting, stating the relevant agenda items. An address may last for no more than three minutes. If an address is made, the Cabinet member who has political responsibility for the item for decision may respond or the Cabinet will have regard to the points raised in reaching its decision.

Councillors speaking on Neighbourhood issues (10 minutes in total)

Any City Councillor can raise local issues on behalf of communities directly with the Cabinet. The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one working day before the meeting, giving outline details of the issue. Priority will be given to those members who have not already addressed the Cabinet within the year and in the order received. Issues can only be raised once unless otherwise agreed by the Cabinet. The Cabinet's responsibility will be to hear the issue and respond at the meeting, if possible, or arrange a written response within 10 working days.

Items raised by Cabinet members

Such items must be submitted within the same timescale as questions and will be for discussion only and not for a Cabinet decision. Any item which requires a decision of the Cabinet will be the subject of a report to a future meeting of the Cabinet.

To:	**Cabinet**
Date:	18 June 2025
Report of:	Director of Communities and Citizens Services
Title of Report:	Leisure Contract Annual Service Plan (2025-26)

Summary and recommendations	
Decision being taken:	To update Cabinet on the highlights of the first year of the new leisure contract and approve the Annual Service Plan 2025-26, which is an annual requirement of the operator, aiming to align outcomes to the Council's priorities and to address health inequalities.
Key decision:	No
Cabinet Member:	Councillor Chewe Munkonge, Cabinet Member for a Healthy Oxford
Corporate Priority:	Thriving Communities
Policy Framework:	Thriving Communities Strategy

Recommendation(s): That Cabinet resolves to:
1. **Approve** the Leisure Annual Service Plan 2025-26.

Information Exempt From Publication
N/A – no exempt documents

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Oxford Annual Service Plan 2025-26	No
Appendix 2	Active Communities Plan	No
Appendix 3	Leisure Upgrades Overview	No
Appendix 4	Risk Register	No
Appendix 5	Equalities Impact	No

	Assessment	

Introduction and background

1. The Cabinet agreed on 24 January 2024 to receive annual reports on the performance of the Council's leisure contractor and agree the service plan priorities for the following year.
2. The Council appointed its new leisure contractor (More Leisure) on 27 March 2024, and provision officially started on 30 March 2024.
3. This report provides an update on the first year of the contract and an overview of the Annual Service Plan for Year 2 (2025-26).
4. The Annual Service Plan will be reviewed in monthly client meetings and the quarterly meetings of the Strategic Partnership Board which includes officers from the Council and More Leisure's senior management teams, and key partners such as Active Oxfordshire, Public Health and the Integrated Care Board (ICB)

First year performance

5. A summary of the first year's performance of the leisure contract is highlighted below. The first year of performance in the contract is to establish a baseline for future years. It is important to note that at the start of the contract there was a transition of both computer and customer entry systems (turnstiles). While systems were being initiated and to minimise the impact on communities and citizens (i.e. granting entry but not recording full details), not all user data at point of sale will have been captured. Headline figures include:
    a. 280,311 recorded visits (compared to an estimated 474,000 visits in the previous year; NB there is lower confidence in how robust the previous year's figures were given actual intel from visits at site)
    b. 12,803 pay as you go members (comparison data not collected by previous operator)
    c. 4,611 total members, of which 678 are concessionary members (compared to 6,762 recorded members in the previous year; again, we have lower confidence in the previous year's figures)
    d. 2,268 swimming lesson members (compared to 1,448 in the previous year)
    e. 162 membership referrals for people experiencing homelessness and supported by the Council's commissioned homeless pathway services (compared to 40 in the previous year)
    f. A Net Promoter Score of -5 (as of March 2025, compared to -44, how the previous operator ended); areas identified for improvement include changing rooms and facility cleanliness, which is expected to change later in the year following planned investments
6. £32,000 of in-kind funding has been generated and has supported a number of activities such as:
    a. Free swims with Oxford Community Action's half term activity groups

b. Goals Beyond Grass (wheelchair football) sports hall hire

c. Youth Ambition ice skating

d. Oxford Pride inclusive swimming sessions

e. 12 week joint pain programme at Leys Pool and Leisure Centre (led by South East Oxford Health Alliance PCN, a working group of GP practices)

f. Memberships and activity sessions for sanctuary seekers

7. The Council's leisure centres are undergoing significant transformation and have improved immensely over the last year. Key investments and achievements so far include:

    a. Appointment of an Active Communities Manager (sport/community development role) who will work with communities to improve accessibility of the leisure centres and develop new programmes to reach a wider audience, including working with the new Leys Youth Hub

    b. The new Leys Youth Hub which is opening in Summer 2025 will provide positive activities to young people including a climbing wall, music and ICT, kitchen, group activity areas and quiet space.

    c. Continuation of the Council's under 17s free swimming programme, which currently offers 37 hours of free swim sessions across its pools, at no cost to the Council

    d. Continuation of the Council's excellent concessionary scheme, which offers low cost pay as you go and monthly membership to residents on low incomes

    e. New state-of-the-art gyms at all of the Council's leisure centres, including E-GYM equipment at Ferry Leisure Centre and Leys Pool and Leisure Centre, and Genius AI (which creates personalised training plans for members – the first UK leisure centre to get this technology)

    f. Extended opening hours and programming at all leisure centres (various times) to improve the customer offer

    g. Refurbishment of two squash courts at Ferry Leisure Centre and conversion of unused court into spin studio

    h. Leys Pool and Leisure Centre sports hall conversion of 4 courts, creating a new climbing area, bespoke soft play (which includes Oxford landmarks such as the Radcliffe Camera, Bridge of Sighs and Covered Market) and ninja tag arena; painting other half of hall and plan to refresh the flooring

    i. Successful mobilisation and opening of Hinksey Outdoor Pool (both years)

    j. New energy and water saving showers at all leisure centres, another initiative to help reduce the Council's environmental impact

    k. New catering and café facilities, which includes bringing catering in-house and working on achieving a balanced offer of healthy options and treats

    l. New ice pad and low-emissivity ceiling at the Ice Rink, helping to reduce carbon emissions

    m. Redecoration of many spaces to help bring the leisure centres back to life and improve the customer experience

8. A summary slide deck that highlights some of these key achievements and photos is available in Appendix 3.
9. The Council's relationship with More Leisure has been a positive one, with good communication and support from before the contract even formally commenced. An example of this was Hinksey Pool opening as planned a week into the contract. There are monthly formal meetings to track progress and regular updates with the local team. The company is very flexible and keen to work in partnership with the Council.
10. For the year ahead the Council will look to strengthen this relationship and work to secure stronger communications (both internal and external) and improved resolution times in relation to feedback and complaints.

Annual Service Plan

11. The Annual Service Plan ("the Plan") (Appendix 1) outlines the priorities and actions to enhance leisure services in Oxford, including key capital investments. It focuses on improving health and wellbeing across target groups including children, young people, women, people with disabilities, and older adults.
12. The Plan cross-references the Council's Active Communities Plan (Appendix 2) and includes initiatives for physical activity, mental health support, community engagement, and environmental sustainability, aiming to create inclusive and accessible leisure opportunities for all Oxford residents.
13. The Plan aligns with key Council strategies such as the Thriving Communities Strategy, Health and Wellbeing Strategy and wider ones such as Oxfordshire County Council's Health and Wellbeing Strategy, and Sport England's Uniting the Movement. Some of the key initiatives are outlined below:

<u>Children and young people:</u>

14. Activities for Children (0-11): HAF (Holiday Activities and Food) programmes, breakfast clubs, free swimming, and junior sports activities.
15. Youth engagement (12-19): Friday youth night activities, free U17s swimming, and partnerships with youth-focused groups.

<u>Women and girls:</u>

16. Female-only swimming sessions.
17. Promotional activities: initiatives like "Let's Lift the Curfew" and "This Girl Can," along with menopause awareness training.

<u>People with disabilities:</u>

1. Inclusive activities: disability swimming lessons, multi-sports sessions, quiet hours, and SEN (Special Educational Needs) swimming.
2. Specific condition sessions: activities for individuals with conditions such as Parkinson's, dementia, and other disabilities.

<u>Older adults and long-term conditions:</u>

3. Referral schemes: collaborations with healthcare providers for GP referrals, smoking cessation, falls prevention, COVID recovery, cancer recovery, and cardiac rehabilitation.

18. Dedicated activities: programmes like E-Gym, 50+ badminton, Move Together and the Good Boost initiative in Barton.

Multicultural communities and engagement:

19. Community outreach: targeted activities for diverse groups, including Muslim prayers on Friday evenings and partnerships with multicultural community groups.

20. Community engagement: volunteer schemes, partnerships with health and social care services, and support for local community groups.

Environmental initiatives:

21. Carbon Reduction Plan with specific targets for reducing emissions and waste.

Health and wellbeing:

22. Health Hub Initiatives: Chatty Café, You Move, Little Lungs Matter policy, and quiet hours across all sites.

4. Healthy catering: promotion of healthy catering and vending options across the sites, including cafés.

5. More Leisure and teams from the Council's Communities and Citizens Services to continue working with key partners such as the ICB, Public Health, Oxfordshire County Council Adult Social Care and Thames Valley Police.

23. These initiatives are designed to create inclusive and accessible leisure opportunities, improve physical and mental health, and foster community engagement across Oxford.

Financial implications

24. There are no financial implications.

Legal issues

6. There are no legal implications arising from the report.

Level of risk

25. The level of risk is low. A Risk Register is shown in Appendix 4.

Equalities impact

26. The Equalities Impact Assessment is shown in Appendix 5. The Annual Service Plan incorporates equalities at its core and there are no implications arising from this.

Carbon and environmental considerations

27. Not required, as for key decisions only.

Report author	Hagan Lewisman
Job title	Active Communities Manager
Service area or department	Communities and Citizen Services
Telephone	01865 252706
e-mail	Hlewisman@oxford.gov.uk

Background Papers:
None

Oxford Leisure Annual Service Plan
April 2025 to March 2026

An introduction to More Leisure and our Oxford partnership

More Leisure Community Trust is a solutions organisation whose vision is:

To inspire all individuals to engage in activity and to be at the heart of improving health and wellbeing in the community.

And our mission:

Working with strategic partners to promote active and healthy lifestyles for all, in a safe, warm, clean, friendly and fun environment.

Our partnership with Oxford City Council

We started our 10 year (plus 5 year option to extend) partnership with Oxford City Council in March 2024. Our values align with key Council strategies such as the Thriving Communities Strategy, Health and Wellbeing Strategy and wider ones such as Oxfordshire County Council's Health and Wellbeing Strategy, and Sport England's Uniting the Movement. Our National Active Wellbeing Strategy supports community development and integration with the health sector, recognising the need for strong partnership working and pivoting from a traditional leisure model to active wellbeing.

Health inequalities in Oxford

Oxford City faces notable health inequalities, with life expectancy varying significantly across different areas. Men in the most deprived areas live up to 13 years less than those in the least deprived areas, while women face a gap of around 9 years. Approximately 21% of children live in poverty, rising to 26% after housing costs. Our partnership plays a crucial role in supporting residents to lead healthy lifestyles, connecting with the health and voluntary sectors.

Achievements and highlights from last year

The contract was effectively mobilised and started on 30th March 2024, starting from a low baseline in terms of performance and facility management. Some of the key achievements and highlights from the first year of the contract include:

Barton Leisure Centre

- Full gym refurbishment
- Replacement of Spin bikes & Aerobic equipment
- Replacement of the reception floor
- Rebranding of centre
- Installation of Lynxight (assisted lifeguard technology)

Ferry Leisure Centre

- Full gym refurbishment and E-GYM
- Refurb of two squash courts
- Commencement of conversion of unused squash court into indoor studio
- Replacement of spin bikes
- Café refurbishment
- Rebranding
- Inflatables
- Installation of Lynxight (assisted lifeguard technology)

Leys Pools and Leisure Centre

- Full gym refurbishment and E-GYM
- Youth Hub works
- Sports hall conversion, creating a new climbing area, soft play and tag x; refresh of other half of hall
- Installation of Lynxight (assisted lifeguard technology)
- Branding
- Replacement of café furniture
- Indoor cycling studio including the purchase of new bikes

Hinksey Heated Outdoor Pool

- Opened on time – Mobilised within 10 days of contract commencement
- New outdoor seating
- rebranding/redecoration including beach hut theme

Oxford Ice Rink

- New ice pad
- Installation of low-emissivity ceiling (Salix-funded, in partnership with OCC)
- Replacement flooring around the rink
- Rebranded

Contract-wide

- Extended opening hours at all leisure centres
- New energy and water saving showers at all leisure centres (Salix-funded, in partnership with OCC)
- Two Big Open Weekends
- Outreach events attended e.g. Older People's Day
- Contract wide recruitment strategy

Key deliverables for this year – capital works and active communities

Barton

- Sauna/indoor cycling (tbc)
- Wet and dry changing room refurbishment

Ferry

- Pool water features
- Indoor cycle studio
- Dry change (subject to agreement and tenders)
- Wet change

Leys

- Pool water features
- Sand and reseal of the sports hall floor
- Dry changing rooms (subject to agreement and tenders)

Hinksey Pool

- New in-house catering
- New seating

Ice Rink

- Toilet refurbishment
- New in-house catering

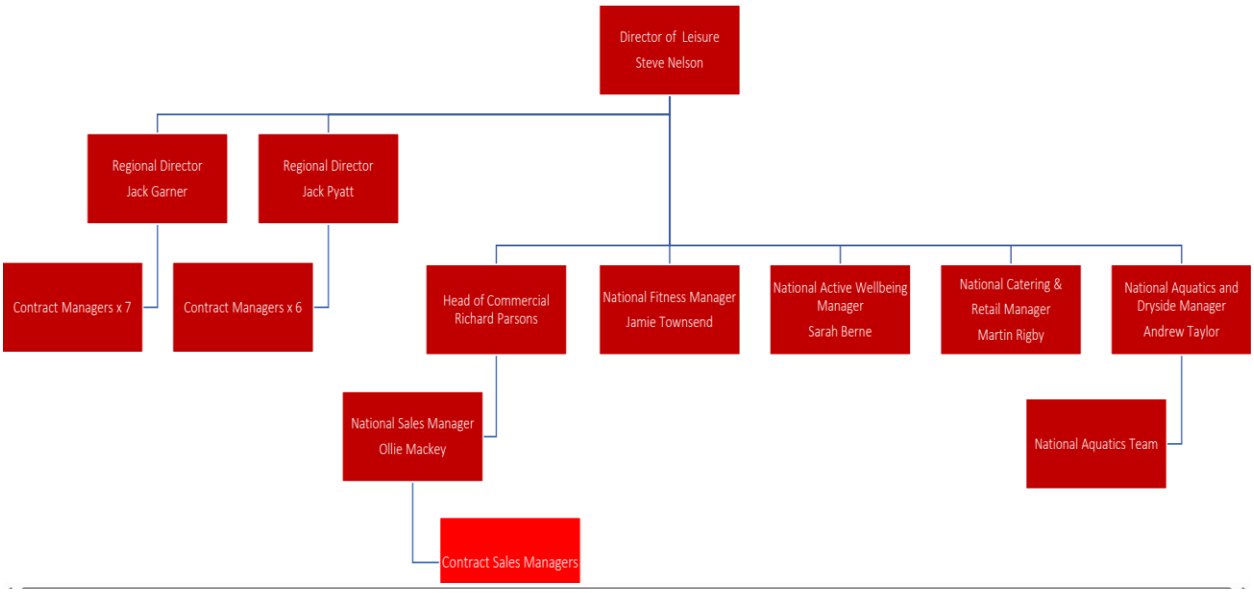
Key active communities deliverables

- Implementation of Active Communities Plan (Appendix 2)
- MECC training for front of house staff
- Exercise referral pathway (including social prescribing)
- Launch of Leys Youth Hub
- Increased participation of all demographics
- An Increase in early years, parents/carers and young people engagement
- An Increase in women and girl's provision
- Implementation of a wellbeing programme of activities across all sites
- An Increase multi-cultural communities' engagement
- An Increase in specific activities and initiatives for those with a long term health condition, neurological disorder, disability and neurodivergence
- Physical activity programme delivered alongside NHS education and support schemes
- Healthy food offer to be in place including all food served and vending machines by April 2026
- Free drinking water available and opportunity for wider community to refill their drinking water bottles
- Concessions for You Move/Move Together participants

Key performance indicators

Measure	Baseline (Year 1, 2024/25)	Target (Year 2, 2025/26)
Total members	4,611	3%
Total participation	280,311	3%
Gender breakdown • Male • Female • Other	 48.4% 51.2% 0.4%	
Age breakdown • Under 18s • Adults (18 to 64) • 50+	 106,486 170,529 3,296	 3% 3% 3%

How we're organised



Active Wellbeing Delivery Plan - Oxford

Core Contract Standards

		Current Provision	RAG	Notes/ Actions
Starting Well	Early years programme established & branded	Project not started		Delivered in Q3
	Baby Welcome Policy embedded throughout all sites.	Project not started		Delivered in Q3
Growing Well	Established programme of wet & dry side activities.	Current core provision		Delivered in Q2
	Teen Gym pathway & product			Delivered in Q3
	SEN Provision across centres			Delivered in Q2
Living Well	Established member journey & group exercise programme.	Fully embedded		Complete
	Adult disability sessions across centres.			complete
	Gym team trained in behaviour change	Project not started		Delivered in Q3
	Front of house staff trained in MECC	Project not started		Delivered in Q2
Aging Well	Older adult programme of activity established & clearly marketed.			Delivered in Q3
	Wet side facilities Water Wellbeing accredited.	Assessment underway		Delivered in Q4
	Staff trained in Dementia awareness.	Project not started		Delivered in Q3
Health Hub	Chatty Café set up and established.	Project not started		Target April launch
	Little Lungs Matter policy implemented.	Project not started		Target March launch
	Quiet hours embedded across all sites	Project not started		Target April launch
	Healthy catering & vend options promoted.	Project not started		Delivered in Q4
Partnership Working	NHS, Primary Care & Social Prescribing Partners	Strong partnership links		Delivered Q2
	Establish relationships with community groups who service those from lower socio-economic groups			Delivered Q2
	Establish partnerships with Multicultural community groups & Youth groups			Delivered Q2

Local Priority Groups		Current Provision	RAG	Notes/ Actions
Children 0-11	Set up & promote activities targeted at children aged 0-11 to increase participation in physical activity. Activities such as HAF, breakfast clubs, free swimming and junior sports activities.			
Children & young People 12-19	Increase participation from this age group. Activities such as Friday youth night, free swimming family fun sessions & links with other youth focussed groups.	Tag active planned in Sports court. Disability school provision programmed in pool. Partnership with "You Move"		
Women & Girls	Offer female only sessions across facilities. Target females through promotional activities e.g. Lets lift the curfew & This Girl Can. Menopause awareness training.	Leys - Ladies only swim sessions Wednesday & Friday - Refugee Women's only session - Ladies only swim lesson availbility - U17's ladies only splash and learner pool sessions		
Multicultural Communities	Target specific groups from local community and offer suitable activities across centres. Outreach to local community groups to understand more around removing barriers to physical activity.	Leys - Muslim prayers on Friday evening/Refugee swim lessons		
Referral Schemes, Older People & LTC's	Work with HCP's & other health & wellbeing practitioners (e.g. Social Prescribers) to grow a referral route into supported physical activity for people with LTC's. Ensure there is dedicated provision of activities to those who are older or living with LTC's.	E-Gym at Leys & Ferry, 50+ Badminton, Good Boost in Barton. Planning to introduce Forever Fit programme of activities		
People with Disabilities	Offer inclusive swim, sport & gym sessions for people with disabilities. Programme in quiet hours & SEN swimming. Offer sessions for specific conditions such as Parkinson, Dementia etc	Disability Multi Sports session. Leys - Public disability sessions Mon-Fri - Swan disability weekly sessions		

Note: In an atempt to help to address gaps Laurie (National Partnership Manager) has established links with a range of national partners who have off the shelf products that are ready to go and be implemented. The following partners have products that could work in this contract and help us address the gaps identified. Further discussion needed around details and what could work locally.

Oxford	Boccia
	Gymnastics
	Women in

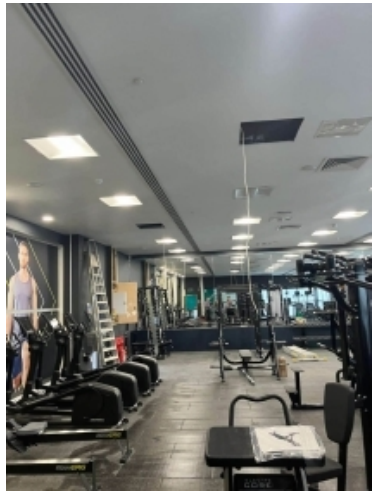
Gap Analysis	Starting & Growing Well	Growing Well	Growing & Living Well	Growing & Living Well	Living Well	Living Well	Living & Aging Well	Living & Aging Well	All	All	All	All	All	Other notes captured throughout conversation.
	Children (aged 0-11)	Young People (aged 12-18)	Carers, those in care & care leavers	Women & Girls	Physical Health (e.g. activity, obesity, smoking, substance misuse)	People with disabilities/ LTC's	Referral Schemes	Older people , Veterans	Multicultural Communities	Low Socio-economic Groups	Mental Health	All/ other inequalities	Improving health & Wellbeing of facilities	
Oxford Priority Areas:	Y	Y		Y		Y			Y	Y	Y	Y		
Detail of what's currently being delivered by Serco:		Tag Active planned to be available in sports hall. Planning to programme in SEN sessions.		Leys - Ladies only swim sessions Wednesday & Friday - Refugee Women's only session - Ladies only swim lesson availbility - U17's ladies only splash and learner pool sessions		Leys - Public disability sessions Mon-Fri - Swan disability weekly sessions		E-Gym at Leys & Ferry, 50+ Badminton, Good Boost in Barton. Planning to introduce Forever Fit programme of activities.	Muslim Prayers Friday evening. Church sessions (?)	You Move Partnership with council. Children on free school meals are entitled to discounted membership rates. Homeless Pathway Scheme, entitled to 6months free membership for anyone referred on Homeless pathway				Leys soft play site would be great for programming early years sessions here but nothing happening currently due to refurb. Would like a GP referral programme. Need to introduce quiet times & disability sessions. Ferry Studio isn't really used throughout the day, would like to do some parent & toddler groups.
Detail of what's being delivered by Partner Clubs:		Disability school provision use pool for swim session. "Keen" disability group hire facilities to do multi sports sessions. Home Education group hire facilities. Youth Ambition CIC - Looking to use youth hub Friday evenings to keep children off streets		70+ ladies hire studio to run own yoga session.			Cardiac Rehab external provider.							

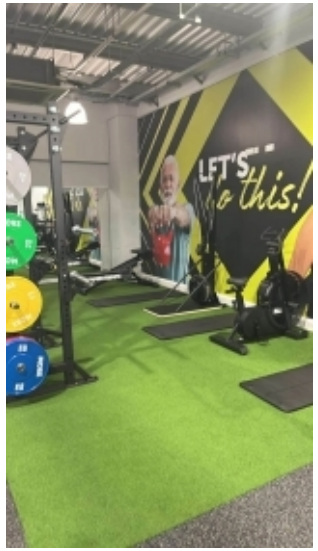
Leisure Upgrades Overview

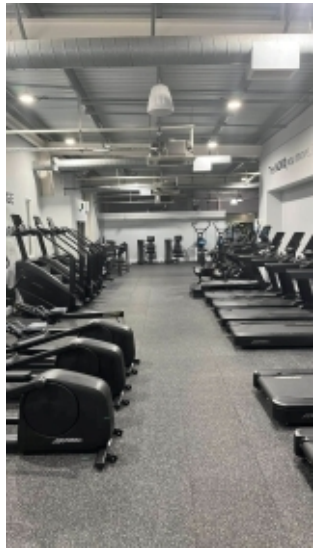
April 2025

Gym refurbishments – Barton, Ferry and Leys

Completed August 2024

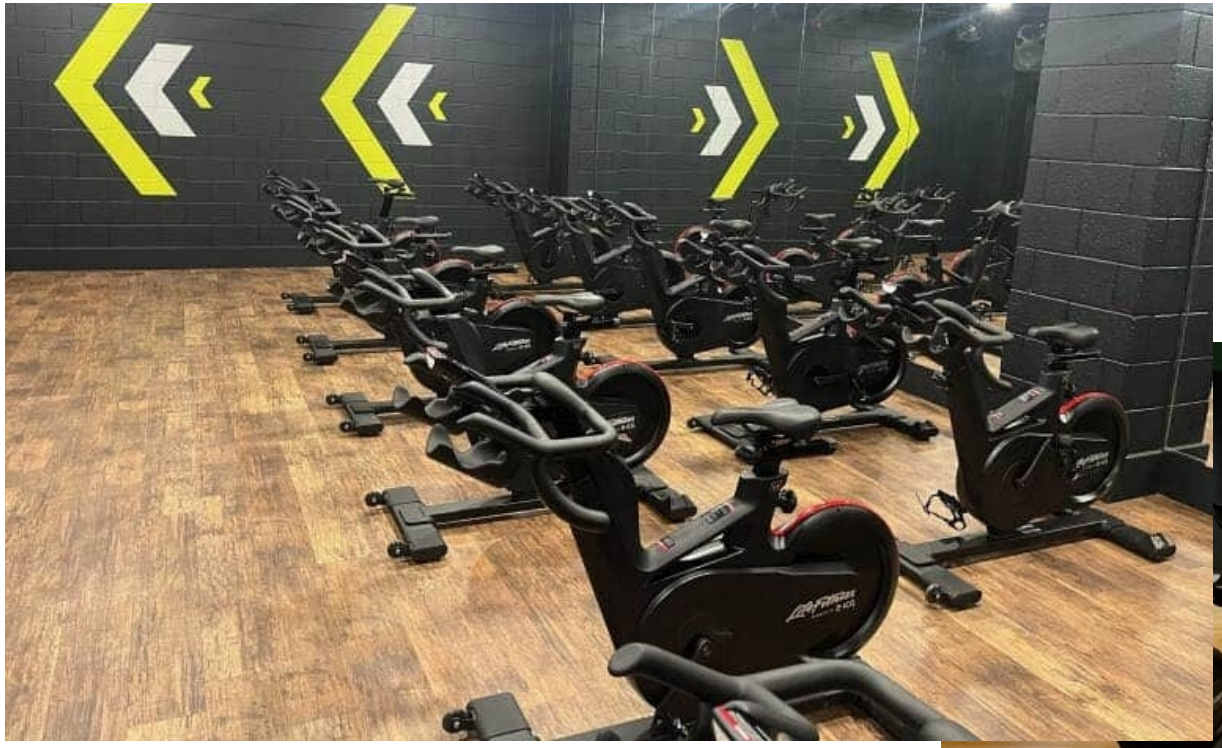




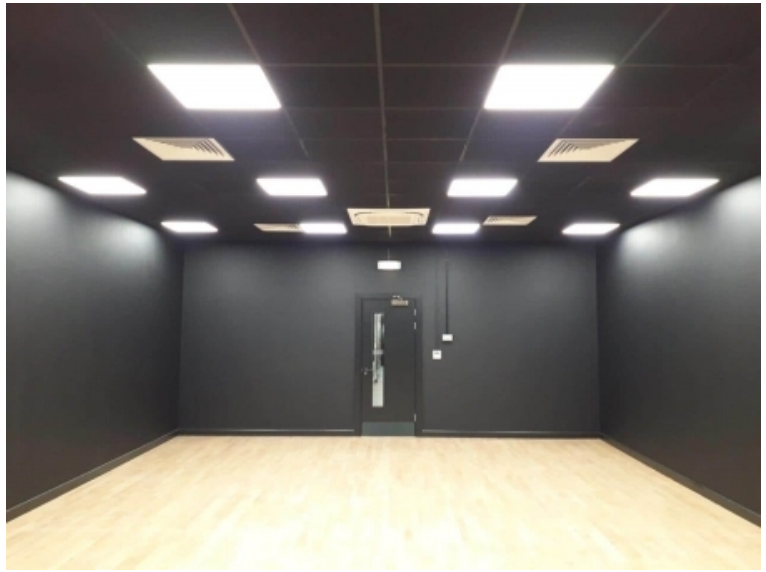


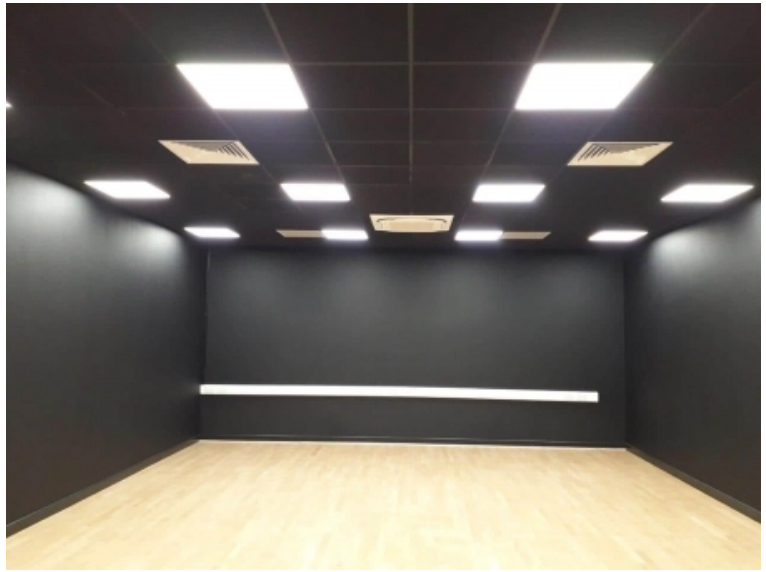
Catering – all sites

Spin bikes – Leys, Ferry and Barton



Studio conversion (illustrative photos) – Ferry

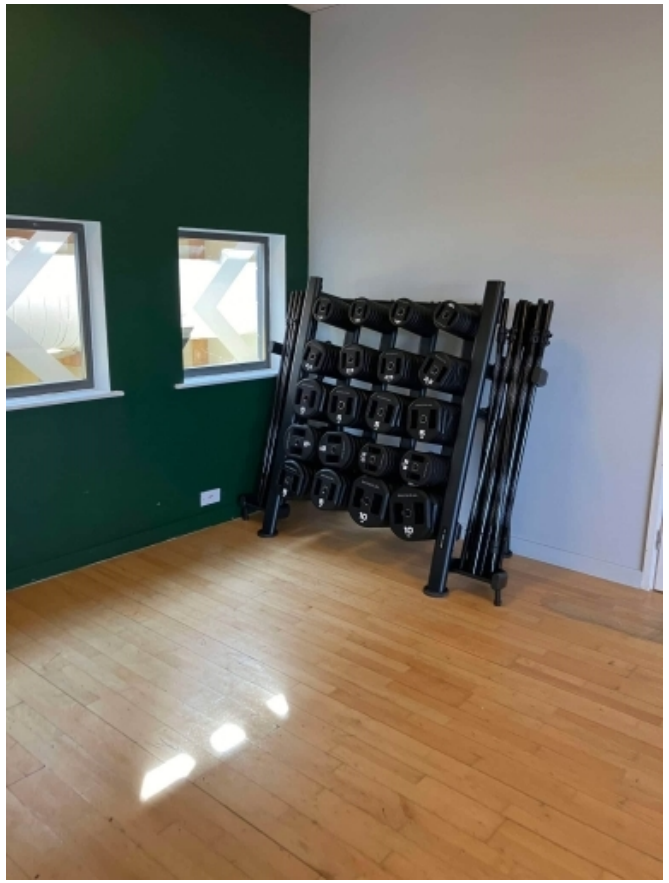




Reception floor – Barton

MORE

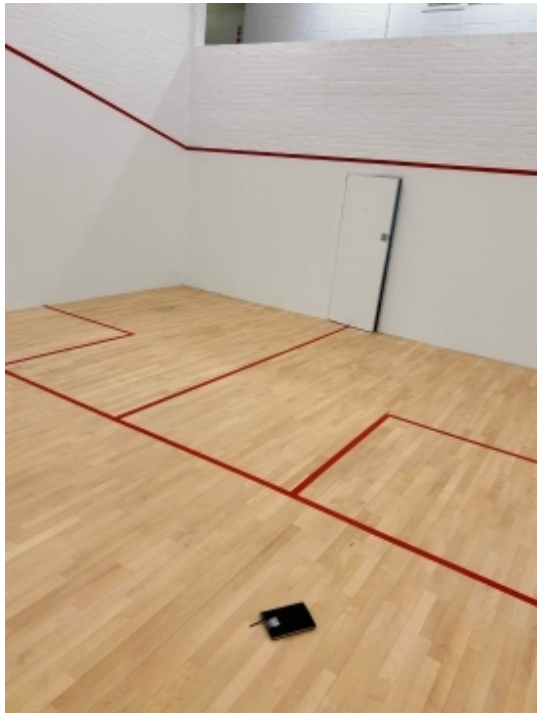
Aerobics equipment – Barton, Ferry and Leys

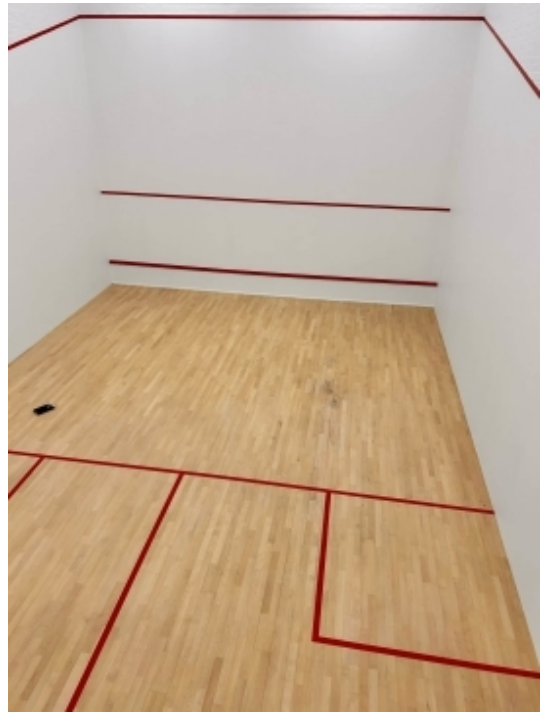


Ice replacement artwork and low-e ceiling – Oxford Ice Rink

Squash court refurbs – Ferry

After





Before

MORE

Pool inflatables – Barton (Ferry to follow)

MORE

Active zone (soft play) – Leys

Soft Play – Level One

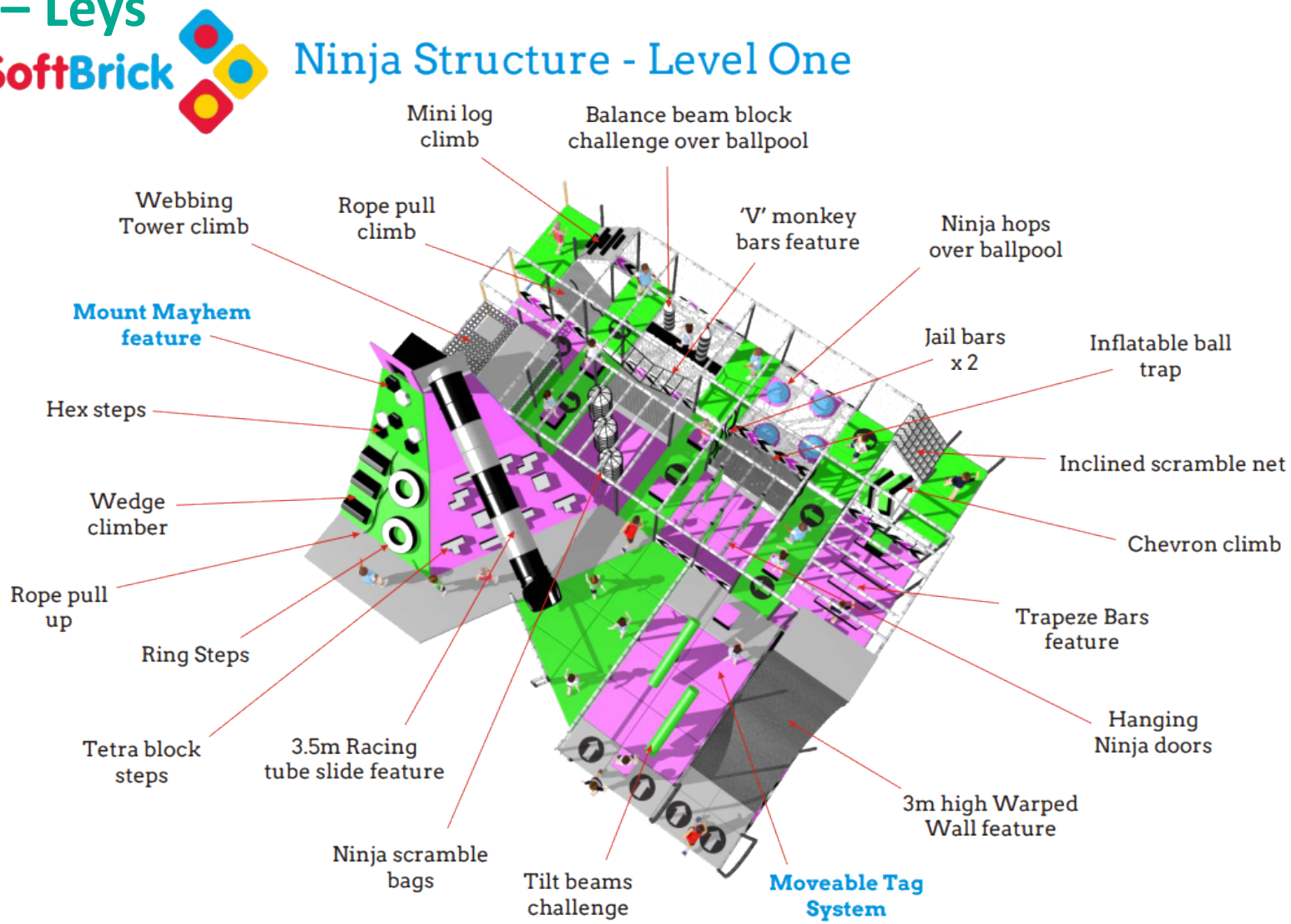
SoftBrick Level One

Search for the lost gold coins treasure hunt
Oxygen tank vertical roller squeeze
Secret sea cave with sunken treasure chest
Stalagtite biff snakes x 2
Wobbly diver
Port hole deck with polycarb window
Jail bars feature
Monkey bars feature
Star fish plinths x 2
Shark head feature
Periscope panel WOW feature
Step climb to level two
Easy access log ramp climb to level two
Stingray wave deck
Climbing zone floor pads, barrier and gate
Ballpool 'T' steps and vinyl curtain x 2
Toddler's & Role Play Area
Coral reef ripple deck
Radcliffe Camera
Ballpool liners & PVC Targets
Ballpool feature
Surf board balance beam
Puffer fish swing pad
Swing ring challenge
Drift wood ripple deck
Entrance/ exit
Stars, Clouds and Water 4 lane wavy open slide off 3m
Bridge of Sighs
Portal pad feature
"No entry" vinyl arch
Squid biff bash bag
Portal pad feature

MORE

Active zone (Tag-X) – Leys

Ninja Warrior – Level One



Branding and redecoration – all sites

MORE

Lynxight – safer swimming at Barton, Ferry and Leys

Risk Register - More Leisure Annual Service Plan 2025-26

Ref	Title	Risk Description	Opp / Threat	Cause	Consequence	Risk Treatment	Date Raised	Owner	Gross		Current		Target		Comments	Control / Mitigation Description	Date Due	Action Status	% Progress	Action Owner
									P	I	P	I	P	I						
1	Deterioration of ervice	Deterioration of the standard delivered (customer service and maintenace) over the lifetime of the contract.	Threat	Lack of focus on getting the basics right	Reduced level of service for local people and reduced participation	Reduce	27/02/25	Hagan Lewisman	1	4	1	4	1	4		Ensure that there is a robust plan place, regular monitoring takes place and a strong client team				Hagan Lewisman / James Baughan
2	Financial	The external provider is unable to achieve their business forecasts and asks for a change in contractual arrangements	Threat	External factors such as pandemics, utility pricing or a bid that was unrealistic.	Financial impact to OCC and or service reduction to cut costs that impact service quality.	Reduce	27/02/25	Hagan Lewisman	3	4	3	4	2	4		Ensure robust contract in place and strong, well skilled client team				Hagan Lewisman / James Baughan
3	Inclusive access	Pricing and concessions are not effective at increasing usage in target groups.	Threat	Operator focusses on full paying customers	Leisure centres not playing their role in tackling inequalities	Reduce	27/02/25	Hagan Lewisman	3	4	2	4	1	4		Concessions offer will continue to be shaped as part of active wellbeing delivery; changes may need to be made to improve the concessionary offer. Ensure community fund impacts a wide range of demographics.				Hagan Lewisman / James Baughan
4	Partnership	Effective partnerships not formed	Threat	Ineffective governance	Contract does not deliver its target outcomes	Reduce	27/02/25	Hagan Lewisman	2	3	1	3	1	2		Well-designed governance				Hagan Lewisman
5	Health and safety	Issues on sites around health and safety of customers or staff	Threat	Poor systems of health and safety governance	Injuries or fatalities	Reduce	27/02/25	Hagan Lewisman	3	5	2	4	1	3		Client meetings and inspections				James Baughan
6	Misalignment of Council priorities	Contractor not understanding and aligning with Council's values, contract and priorities; focusing on commercial over active communities	Threat	Poor working relationship and communications	Contract not delivering active communities outcomes	Reduce	27/02/25	Hagan Lewisman	4	4	3	4	2	3		Client meetings and partnership working				James Baughan
7	Reputation	Risk to Council reputation	Threat	Customers and councillors unhappy with performance of contractor	Reputational damage	Reduce	27/02/25	Hagan Lewisman	3	3	2	2	2	2		Ensure contract performs well via Annual Service Plan and monitoring				Hagan Lewisman / James Baughan
8	Local government reorganisation and devolution	Risk to leisure contract as local government is reorganised	Threat	Government policy	Uncertainty on client arrangements or alignment of contract	Accept	27/02/25	Hagan Lewisman	5	3	4	3	3	3		Keep updated with local gov reorganisation plans; Annual Service Plan commits work				Hagan Lewisman
9	Unknown external factors	Unknown risks such as future pandemics	Threat	Unidentified risks	Unknown	Accept	27/02/25	Hagan Lewisman	3	3	3	3	3	3		None				Hagan Lewisman

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.** **For example:** -New policy, -Review of existing policy, -Changes in service(s), -New project(s), etc.	Leisure Annual Service Plan 2025-26	**2.**	**The implementation date of the activity under consideration:**	April 2025 to March 2026
3.	**Directorate/Department(s):**	Communities and Citizens Services	**4.**	**Service Area(s):**	Active Communities
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Hagan Lewisman hlewisman@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	James Baughan jbaughan@oxford.gov.uk
7.	**Is this a new or ongoing EqIA?**	New ☒ Extension to existing EqIA ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	N/A
9.	**Date this EqIA started:**	21/02/2025			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	This will be an appendix of the Cabinet report on the subject	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	April 2024 as part of the Cabinet report process

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐ Budget	☐ Decommissioning	☐ Commissioning	☐ Change to an existing activity.
		☒ New Activity	☐ Others. Please specify:		
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☐ Good, affordable homes	☒ Strong, fair economy	☒ Thriving Communities	☒ Zero Carbon Oxford	☒ Well run council
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care.	☐ Diverse and engaged workforce.	☐ Leadership & organisational commitment.	☒ Understanding and working with our communities.
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	Aims: improve the leisure offer and address health inequalities, getting more people active, more often Objectives: various including increasing the number of children leaving primary school able to swim a length; linking with the Thriving Communities Strategy outcomes and creating more inclusive/accessible facilities Priorities: delivering the best and most inclusive leisure offer for our citizens			

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16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	Participation levels will fall; inactivity may increase; health inequalities may worsen. The City Council will not be able to fulfil its key corporate priorities.

Section 3: Understanding service users, residents, staff and any other impacted parties.

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17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	Dialogue with Leisure Partnership Board in the lead up to the change in operator. Meet the manager sessions.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research,	Data used will include: • Census • Oxfordshire Joint Strategic Needs Assessment (JSNA) • District Councils' Network Fit for the Future report • Community health profiles • Usage data from leisure facilities

	-census data, -legislation, -articles, -reports, -briefs.	• Index of Multiple Deprivation (IMD) • Schools Sports Pupil Premium • Department for Work and Pensions
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes ☒	No ☐	Don't Know ☐
		Members of staff	Yes ☒	No ☐	Don't Know ☐
		General public	Yes ☒	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☒	No ☐	Don't Know ☐
		City Councillors	Yes ☒	No ☐	Don't Know ☐

		Council suppliers and contractors	Yes ☒	No ☐	Don't Know ☐

21. **Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**

Check as needed and provide evidence-driven conclusions**.**

Good Practice is to keep it simple and list your, evidence, insights, and mitigations.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information supporting your assessment	Analysis, insight & mitigations
Age	☒	☐	☐	☐	25k under 15s (16% of population) 19k over 65s (18% of population) Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Some age groups will benefit from a considered approach to using simple standardised relatable language and signage.
Disability **(Visible and invisible)**	☒	☐	☐	☐	15% living with disabilities Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces.

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						Mitigations and considerations: Individuals with visual impairment and who are neurodiverse will benefit from a considered approach to using simple standardised relatable language in literature, signage, and other forms of communication.
Gender re-assignment	☒	☐	☐	☐	Insufficient data	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit form a considered approach to using gender inclusive language that is standardised in literature, signage, and other forms of communication.
Marriage & Civil Partnership	☐	☐	☒	☐	28% married or in civil partnership. Source: Census 2021	**Impact(s) identified:** People (new and ongoing users of the leisure centres) who identify with this protected characteristic will not be disproportionately impacted negatively or positively. **Mitigations and considerations:** Individuals in this group will benefit from a considered approach to using inclusive language which is standardised in literature, signage, and

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						other forms of communication.
Race, Ethnicity and/or Citizenship	☒	☐	☐	☐	54% White British 17% White-non-British 15% Asian 6% Mixed 5% Black 4% Other ethnic group NB: figures total 101% due to rounding Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit from a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication. These actions include not using the BAME acronym in literature. Using more diverse and relatable images and colours in spaces and communications.
Pregnancy & Maternity	☒	☐	☐	☐	1,374 live births in Oxford in 2021 Source: Oxfordshire JSNA 2023	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit from a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.

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Religion or Belief	☒	☐	☐	☐	39% no religion 38% Christian 9% Muslim 2% Hindu 1% Buddhist 1% Jewish 0.5% Sikh 1% other NB: figures do not add up to 100% because they do not include those who did not reply to the religion question in the census Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people from all faiths/beliefs and none. **Mitigations and considerations:** Individuals in this group will benefit frrm a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.
Sex	☒	☐	☐	☐	49.1% male 50.9% female Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit form a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.
Sexual Orientation	☒	☐	☐	☐	80% straight/heterosexual 7% not straight/heterosexual NB: figures do not add up to	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programs will aim

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					100% because they do not include those who did not reply to this question in the census Source: Census 2021	to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit from a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.
Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☒	☐	☐	☐	10 of Oxford's 83 neighbourhood areas are among the 20% most deprived areas in England. These areas, which are in the Leys, Rose Hill, Littlemore, Barton and other areas of the city, experience multiple levels of deprivation – low skills, low incomes and relatively high levels of crime. Source: Index of Multiple Deprivation (2019)	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group, especially with the strong concessionary scheme in place ('Bonus'); some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit form a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.
Other (voluntary consideration) **For example:** Migrant, refugee, or asylum seekers.	☒	☐	☐	☐	35% of Oxford's population was born outside the UK Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit form

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						a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☒	☐	☐	☐	Oxford's high cost of living and other factors result in homelessness. Source: Census 2021	**Impact(s) identified:** An improved, more accessible, and inclusive leisure offer will be attractive to people in this group; some targeted programmes will aim to welcome those who are not using these spaces. **Mitigations and considerations:** Individuals in this group will benefit form a considered approach to using inclusive language which is standardised in literature, signage, and other forms of communication.

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.** Check as needed.					
	☐	Stop and reconsider the activity.	☐	Adjust activity before beginning the activity and continue to monitor.	☒	No major change(s) or adjustments and continue with activity but continue to monitor.	☐	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		The new leisure operator will continue to transform the City's leisure offer and create better, more welcoming facilities that attract people from all backgrounds. As programmes are developed and changed, and as the staffing establishment expands, it is recommended to review this EqIA as required, to ensure people are not negatively impacted.

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.	James Baughan			
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**	James Baughan			
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.	Yearly	**27.**	**Date when the EqIA will be reviewed again.**	January 2026

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Section 7: Sign-off

Name: Hagan Lewisman Job Title: Active Communities Manager	Name: Full Name Job Title: Type here	Name: Full Name Job Title: Type here	**Suggested list of people to include are:** 1) Project lead/manager. 2) Head of service area or team.

Signature:	Signature:	Signature:
---	---	---
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
---	---	---
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature:	Signature:	Signature:
---	---	---

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54

You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

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To:	**Cabinet**
Date:	**18 June 2025**
Report of:	**Director of Planning and Regulation**
Title of Report:	**Oxford Local Plan 2042 Regulation 18 Consultation**

	Summary and recommendations
Purpose of report:	The Cabinet is requested to approve the First Draft Oxford Local Plan 2042 (Regulation 18 consultation) Document for consultation. It is a Plan which is looking to accelerate the move to zero carbon building standards and continues to see housing delivery as a priority whilst ensuring we deliver a mixed and inclusive economy.
Key decision:	Yes
Cabinet Member:	Councillor Alex Hollingsworth, Cabinet Member for Planning
Corporate Priority:	Support thriving communities, Enable an inclusive economy; Pursue zero carbon Oxford; Deliver more affordable housing
Policy Framework:	The Local Plan is a statutory requirement. The scope of the policies is wide and encompasses all of the Council's corporate priorities

Recommendation(s): That Cabinet:

1. **Approve** the First Draft Oxford Local Plan 2042 (Regulation 18 Consultation) document for public consultation;
2. **Authorise** the Director of Planning and Regulation to make any necessary minor editorial corrections to the documents and the supporting evidence base prior to going out to consultation.

Appendices	
Appendix 1	First Draft Oxford Local Plan 2042 (Regulation 18 consultation) document
Appendix 2	Draft Sustainability Appraisal
Appendix 3	Equalities Impact Assessment
Appendix 4	Risk Register

Introduction and background

1. The purpose of this report is to seek approval for the First Draft Oxford Local Plan 2042 (Regulation 18) document to be published for consultation (Appendix 1). This document builds on the work of the now withdrawn Oxford Local Plan 2040, reflecting changes in local context and national policy and updates to key evidence base documents.

The First Draft Oxford Local Plan 2042

2. The Regulation 18 consultation is the first of two statutory consultations to be carried out before submission of a local plan to the Secretary of State in order that it may be independently examined. The First Draft Oxford Local Plan document presents a series of draft policies for public consideration. To inform those draft policies, a series of options on a range of topics have been identified and are detailed in background papers. These will also be available as part of the consultation, as they form part of the Sustainability Appraisal (Appendix 2). The main consultation document links to these policy options, alongside the draft policies.
3. Each chapter of the First Draft Oxford Local Plan 2042 represents an overarching objective of the Plan. The following sections summarise key aspects of each chapter.

Vision and Strategy

4. The strategy for the plan is to take a balanced approach to development. The first step in any local plan is to understand needs and the next step is to try to meet these needs, within the bounds of key objective for the plan. Of primary importance is that the plan seeks to achieve sustainable development.
5. The Vision for Oxford in 2042 is that it will be a healthy and inclusive city, with strong communities that benefit from equal opportunities, not only in terms of access to housing and jobs, but to social and leisure opportunities, to healthcare and to the natural environment. Oxford will be a city with a strong cultural identity, that respects our heritage, whilst maximising opportunities to look forwards, to innovate, learn and enable businesses to prosper. The city will be supported to continue to make advancements in the life sciences and low carbon sectors. The protection of the environment is central, ensuring the city maintains its biodiversity, is well connected in terms of blue and green infrastructure and is resilient to climate change. We will utilise resources prudently, while mitigating impacts upon the natural environment. The city will be

net zero carbon by 2040, while our communities, buildings and infrastructure will be more resilient to the impacts of climate change or other emergencies.

6. The vision and strategy chapter contains a suite of draft policies that set out key features of the strategy. These include locational policies that support easily accessible facilities, and a plan-wide viability policy, which sets out when viability evidence may be submitted and a cascade for relaxing the policies and the policy approaches considered as having the most impact on viability, if robustly justified and supported by strong evidence.

A healthy inclusive city to live in

7. There is an urgent need for new homes in Oxford. The very high need for new housing means that general market prices for renting and buying are prohibitive for many. The challenges the workforce may face in finding accommodation mean that employers struggle to find and retain staff.
8. The NPPF requires that the overall housing need is understood and it puts forward the Standard Method as the only method by which this need should be calculated. The Standard Method for Oxford calculates the need as 1,087 dwellings per annum.
9. In addition to the overall housing need, various individual housing needs must be considered, and the plan is expected to attempt to meet these needs. The need for affordable housing is particularly significant in the city and amounts to 709 units per annum, and of this 458 per annum need is for those who cannot afford to either buy or rent. Social rented housing meets the needs of those most excluded from the housing market. Regardless of how high the need is, any policy requirement set for affordable housing must be viable and therefore deliverable. The preferred option as set out in Draft Policy H2 is to maximise the amount of social rented that can be provided and to set the affordable housing contributions at a level that can generally be afforded, which is 40% of housing schemes over 10 units. There will be schemes that have specific features that mean this level of affordable housing cannot be afforded, so when justified, Draft Policy S2 sets out a cascade approach.

A prosperous city with a globally important role in learning, knowledge and innovation

10. The First Draft Oxford Local Plan 2042 sets out draft policies that seek to identify and plan for the employment needs of the city over the plan period whilst recognising the balance of other land uses, particularly housing. Existing employment uses will be supported through the intensification, modernisation and regeneration of existing employment sites, including university and hospital sites. The strategy is that employment needs over the plan period can be met on existing sites. Key employment sites outside of the city and district centres are protected for their importance to the economy. Within the city centres and district centres, full flexibility is proposed, with no protection of sites (although new employment uses could be located here, recognising that within Use Class E, that includes many commercial uses, new employment uses could take place as a lawful use). Other draft policies are intended to help ensure benefits of the

successful economy are widely felt, such as the requirement for Community Employment and Procurement Plans and the Affordable Workspace draft policy.

A green, biodiversity city that is resilient to climate change

11. Ensuring people have access to a network of green and blue infrastructure, such as green spaces, is important in Oxford, and these networks need to be protected, as well as new green and blue infrastructure provided in new development where opportunities arise. Draft Policy G3 requires use of the Urban Greening Factor tool to encourage greening on new developments. The draft policies set out the policy requirements that seek to ensure applicants identify/assess and protect existing habitat value and add biodiversity and green features. It covers the approach the plan will take as to how the 10% biodiversity net gain (BNG) required through the Environment Act 2021 should be delivered (Draft Policy G4). In addition to BNG, new development offers the opportunity to support additional biodiversity in the local area through sensitive and well thought out design that incorporates wildlife friendly measures that can support nature, such as bid and bat boxes, insect homes and wildflower meadows (Draft Policy G5).

12. The way we design and build has a key role to play in both mitigating and adapting to the impacts of climate change. Draft policies are included that address adaptation to climate change, including the need for buildings to be built that are resilient to the extreme weather events we are experiencing as the climate warms. There are also draft policies that address flood risk and require sustainable drainage.

A city that utilises its resources with care, protects the air, water and soil and aims for net zero carbon

13. If development is to be truly sustainable, then the city's natural resources must be appropriately stewarded to protect the natural environment, also ensuring public health is not negatively impacted by poor air and water quality.

14. Draft policies support the City Council's target of being a net zero carbon city by 2040. To ensure new development does not increase carbon emissions, policies seek to ensure that new buildings are net zero (Draft Policy R1). Draft policies also support reductions in carbon emissions in existing buildings through improvements to insulation and introducing retrofitting measures where possible (Draft Policy R3).

A cultural city that respects its heritage and fosters design of the highest quality

15. Delivering high quality urban design is about more than just how a building or street looks. It is also about ensuring development functions positively for the people who live and work there, including taking account the need to adapt to climate change, and that development is attractive and easy to move around, particularly for pedestrians and cyclists. New development should respect and respond to the city's heritage and archaeology. The city's historic views into and across the city are encapsulated in the view cones and design should fully consider and respect these key views.

A liveable city with strong communities and opportunities for all

16. Accessibility to valued facilities, services and cultural opportunities is important for making strong local communities that enable people to thrive. Oxford is generally well serviced by local centres, so the focus of this chapter of the plan is on policies that protect them and focus new similar developments to those locations, which are already accessible, allowing linked trips and supporting continued success of those centres.

17. The policy approach towards motor vehicle parking is to continue to seek a downward pressure on both public and residential and non-residential parking across the city. Urban spaces created for people to move around safely, rather than designed to prioritise cars create safer, more attractive and enjoyable environments.

Development sites and infrastructure

18. In order to guide the right type and level of development to the optimal location, whilst fully considering the city's constraints, the Plan contains options for site allocation policies and Areas of Focus. The latter are defined areas across the city anticipated to experience more change as a result of new development (in some cases including development across the city boundary) during the Plan period. Some sites are newly identified, and rather than being put forward as proposed allocations, are put forward with the proviso that further evidence needs to be gathered to determine whether these sites are suitable for a development allocation. In addition to this, areas of search in the Green Belt are defined. The revised NPPF makes it clear that, when there are unmet needs within a planning authority area, the planning authority is required to look to the Green Belt to meet those needs (paragraph 146): *authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.*

19. New development across the city results in additional infrastructure needs. This could range from the requirement for additional capacity at a city school, the introduction of a new cycle or pedestrian route or a contribution to a community or health facility. An Infrastructure Delivery Plan (IDP), which details the key infrastructure needs within the city, will be updated as the 2042 Plan goes through the different stages of preparation. We will continue our engagement with utility and health providers and the county council to get the most up to date information about the city's current and future needs in terms of infrastructure.

Sustainability Appraisal

20. A draft sustainability appraisal has been carried out to assess the identified options against the sustainability objectives. The draft Sustainability Appraisal will be published alongside the First Draft Oxford Local Plan 2042 Document and form part of the consultation.

Consultation

21. Engagement provides an important input in forming and shaping the local plan. Engagement and consultation on the Oxford Local Plan 2042 will be consistent with the Statement of Community Involvement in Planning and appropriate to the stage. Public engagement so far has involved the early engagement survey 17th March-28th April 2025. This was a non-statutory engagement exercise to seek early views from residents, businesses and other bodies to help identify the main issues being faced.

22. The aim of this next stage of consultation (Regulation 18) is to inform and check the direction of the plan. We anticipate that there will be a wide range of views to be considered from different communities and interests within and outside the city. Alongside the evidence base and Government policy, engagement will be important in informing policy direction, together with professional judgement. The consultation will be clear about the wider context and how this affects what the plan can and cannot do, recognising that there are constraints as to what can be included in a plan.

23. The consultation period is intended to commence on 28th June, and run until the 8th August.

24. There will be a further round of consultation, known as the 'proposed submission' plan (Regulation 19). The adopted timetable set out in the Local Development Scheme envisages the proposed submission plan being published for consultation in late Autumn 2025.

Financial implications

25. Work on the Oxford Local Plan 2042 has been structured to be able to progress whilst minimising financial implications. In particular, much of the existing evidence base and policy drafting from the Oxford Local Plan 2040 is still relevant and can continue to be used, although in some cases new evidence or more extensive revisions are required. In particular Employment Land Needs Assessment and jobs forecasting that took place as part of the HENA has been significantly reviewed, as has much of the housing evidence and also the Green Belt review to update the work in-line with the revised NPPF.

26. A budget has been calculated, and the work can be resourced by existing Planning Policy staff and can be funded by existing Planning Policy budgets and reserves. However, as the evidence base progresses, additional needs and therefore costs may be identified. The financial implications of producing a local plan include the costs of a local plan Examination (including Counsel's advice periodically throughout the preparation of the plan).

Legal issues

27. There are no specific legal implications arising from the recommendations set out in this report. There are legal requirements that must be followed through the production of the Local Plan, which will be considered by the Inspector at Examination.

28. The process for preparing the Local Plan is set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and County

Planning (Local Planning) (England) Regulations 2012. Under Regulation 18 of the 2012 Regulations the Council must notify those who have an interest in the local plan and invite each of them to make representations. The consultation will include local residents, businesses, adjoining local authorities and other statutory bodies. In preparing the plan, the Council must consider any representation made to them in response to the invitations. The approach recommended will meet the requirements set out in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for this stage of consultation.

Level of risk

29. A risk assessment has been undertaken (Appendix 3). All risks have been mitigated to an acceptable level.

Equalities impact

30. The Equalities Impact Assessment is attached as Appendix 4.

Carbon and Environmental Considerations

31. The council is committed to addressing the effects of, and reducing our contribution towards, climate change. In 2019, the council declared a climate emergency and has committed to a series of actions. The First Draft Oxford Local Plan 2042 has sustainability, climate change and climate adaptation and mitigation as core themes running throughout the plan. The document seeks to reflect this across all the chapters, whether it is through design policies, parking policies, flooding, drainage or how to ensure the most efficient use of land. The proposed submission draft Local Plan will be supported by a Sustainability Appraisal and Habitat Regulations Assessment.

Report author	Sarah Harrison
Job title	Planning Policy Team Leader
Service area or department	Planning Policy, Planning Services
Telephone	01865 252015
e-mail	Sbharrison@oxford.gov.uk

Background Papers: None

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Oxford Local Plan 2042

Draft Document for Consultation (Regulation 18)

June 2025

Version Control

V1

Contents

CHAPTER ONE

INTRODUCTION AND STRATEGY

WHERE WE ARE

1.1 The Local Plan for the period 2022 to 2042 will replace the Local Plan 2036 and other relevant parts of the development plan including the Northern Gateway Area Action Plan. When adopted, it will form a key part of the Development Plan for the City.

1.2 Oxford is an attractive place to live, work, study and visit and is home to a diverse range of communities. Its environment is characterised by a wealth of heritage that has built up over centuries of settlement and by the many areas of high quality green and blue spaces that harbour a variety of ecologically important habitats. The city has a broad, multi-faceted and active economy, with one of the highest concentrations of knowledge intensive businesses in the UK. This is enhanced by its historic role as a world-renowned seat of learning with two universities and a strong research and innovation sector. However, this attractiveness and success has brought with it challenges for our environment and the people who live and work in the city.

1.3 High demand for land results in high land values; congestion on the city's roads makes movement difficult and exacerbates poor air quality in certain areas; and the supporting infrastructure has struggled to keep pace with a changing and growing city. These challenges are intensified by national and international pressures such as rising build costs for new development, a chronic undersupply of housing, climate change and energy insecurity. The role of this new Local Plan is to build upon the positive aspects that make the city so special, whilst also seeking to address the challenges we face through positive planning policies to ensure the optimum outcomes for the environment and its residents, businesses, education, and health institutions.

1.4 The vision for Oxford in 2042 seeks to address the strengths and challenges identified above. It is as follows:

> ***In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment***

will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.

1.5 The vision for the city in 2042 is divided into key six themes which are illustrated in Figure 1.1. These are three themes based on the pillars of sustainability and three themes which fall at the intersections of those pillars. Taken together, the six themes represent what we consider to be a sustainable future for Oxford.

Figure 1.1: The six themes underpinning our vision for Oxford in 2042 – adapted from the three pillars of sustainability (society, economy and the environment)

1. SOCIETY

   A healthy and inclusive city to live in

2. ENVIRONMENT

   A green and biodiverse city that is resilient to climate change

3. ECONOMY

   A fair and prosperous city with a globally important role in learning, knowledge and innovation

4. SOCIETAL / ECONOMY

   A liveable city with strong communities and opportunities for all

5. SOCIETAL / ENVIRONMENT

   A city that respects its heritage and fosters design of the highest quality

6. ENVIRONMENT / ECONOMY

   A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon

OBJECTIVES AND STRATEGY

1.6 Building on the vision, several objectives that build off each of the six themes identified above. The Local Plan 2042 are proposed below in Figure 1.2 below.

Figure 1.2: The six Local Plan 2042 themes and underlying objectives

Local Plan 2042 theme	Underlying Local Plan 2042 objectives *The Oxford Local Plan 2042 will...*
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient to climate change.	• Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Demonstrate we value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.

A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

OVERARCHING THREADS

1.7 In response to the complexities of planning in such a challenging but dynamic city and alongside a need to urgently respond to inequality and climate change, there are three particularly important threads which are wound throughout the Local Plan and supported by multiple policies across the different chapters. These relate to key issues and challenges facing the city which require a multi-faceted response and that are relevant to all 6 themes underpinning the vision and all of the objectives. As such, all the proposed policies will help to address these key issues.

1.8 The first overarching thread which various proposed policies are trying to address is that of **reducing inequalities** in the city. The Local Plan chapter 2 puts forward a range of requirements aimed at supporting access to affordable housing, as well as a good mix of housing, in order to help address housing inequality. Equally, chapter 3 sets out policies which could seek to support the economy, including addressing unequal access to employment and training through options for policies requiring employment and skills plans as well as provision of affordable workspaces. Polices that are proposed for protecting, enhancing and providing new green infrastructure in chapter 4 are intended to help preserve access to and improve the natural environment across the city and there are other policies located in the document which also respond to this overarching thread.

1.9 The second thread is that of **addressing climate change.** In terms of reducing our emissions (climate change mitigation), the proposed policies of chapter 5 most directly address this issue covering topics such as net zero development, embodied carbon and supporting retrofitting of existing buildings, however policies elsewhere in the Local Plan also address good urban design, parking, and bike storage which can enable people to live lower carbon lifestyles. Equally, a diverse range of policies can support adaptation and resilience to the expected impacts of climate change, from resilient design and construction (which includes concerns around overheating), to flooding, green infrastructure and most of these sit within chapter 4, though other policies such as urban design and health impact assessment will also contribute.

1.10 Meanwhile, the third overarching thread which runs throughout the document is that of **enabling a liveable city** and ensuring that residents have access to the basis of their daily needs within an easy walking distance of their homes. The Local Plan's proposed strategic policies discussed later in this chapter include an overarching spatial strategy which sets out where types of development ought to be focused in the city and helps support this theme. Within subsequent chapters, there are policies which are put forward to focus on more specific aspects of provision that we want to see in our neighbourhoods to help ensure the right balance of needs are met. These include policies on town centre uses (chapter 3), the protection of a network of green spaces across the city (chapter 4), as well as policies which address the provision of community facilities (chapter 7).

SPATIAL STRATEGY AND PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

1.11 The policies of the Local Plan will seek to ensure that new development across the city occurs in the right place. To guide development to the optimum location, development proposals must reflect the key principles which support the spatial strategy.

1.12 Key considerations for the policy:

- The Local Plan should seek to deliver as much of the City's housing need as possible, without having detrimental effects on economic, social and environmental sustainability objectives. The Local Plan should set a housing requirement which seeks to meet housing needs as far as possible using a capacity-based approach.

- The Local Plan's policies will focus on delivering sustainable growth for Oxford that meets the objectives, including by delivering affordable housing, supporting an inclusive economy, ensuring the protection of our green and blue networks and natural resources and supporting the city in moving towards being net zero carbon by 2040.

1.13 How the draft policy responds to these considerations:

- Support for the presumption in favour of sustainable development and the continued support for a wide range of uses which make a city liveable, sustainable and resilient whilst taking into account spatial and local impacts of new development.

DRAFT POLICY S1: SPATIAL STRATEGY AND PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Planning permission will be granted where development proposals accord with the policies of the Plan.

The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to:

a) ensure the continued strength and vibrancy of district and local centres so they continue to attract people and support a range of facilities that meet people's immediate needs conveniently within their local area;
b) ensure new development is focussed on areas with opportunities for sustainable travel links;
c) ensure activities that attract large numbers of people are centrally located in the city centre and district centres, so they are easy to reach by walking, cycling and public transport;
d) focus new employment development that supports Oxford's national and international role in research and development on existing sites already in that use, prioritising housing elsewhere;
e) ensure new uses are in locations where they will not harm the amenity of existing neighbouring uses;
f) prevent new development in locations where it would have a negative impact on important blue and green infrastructure networks, public open space, and result in loss of flood plain.; and
g) take account of local historic context and respond appropriately to heritage significance.

When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the *National Planning Policy Framework* (NPPF). The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.

All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether:

h) the application of policies in the *National Planning Policy Framework* that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

i) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the *National Planning Policy Framework* taken as a whole.

DESIGN CODE AND GUIDANCE

1.14 Good design is a fundamental part of achieving many of the aims of the Plan.

1.15 Key considerations for the policy:

- Good design is not just about creating aesthetically pleasing buildings. It is about placemaking, strengthening the connection between people and the places they share, promoting a sense of identity and people's health and well-being. Good design can also help new development to sit more appropriately on challenging sites or certain locations which are more sensitive to change.

- Some parts of the city will experience change from new development on site allocations and in accordance with other policies of the development plan. Development in these areas will need to pay extra attention to how they are designed to avoid harms and maximise the benefits new development can bring about.

1.16 How the draft policy responds to these considerations:

- The draft policy sets requirements which help to secure high quality design, conserve and enhance historic assets, and character. A design code to inform designs and ensure a comprehensive approach is taken. Identified locations such as areas of focus, city and district centres have associated design guidance.

DRAFT POLICY S2: DESIGN CODE AND GUIDANCE

The design checklist set out in Appendix 1.1 should be used to inform design and ensure that a comprehensive approach is taken from the outset, which includes consideration of the relevant context including heritage, promotion of healthy lifestyles, and protection of the natural environment.

For Areas of Focus, the City Centre and District Centres, and other areas with more detailed guidance, proposals should refer to and align with the design principles set out in the Local Plan or in supporting documents such as the West End and Osney Mead Supplementary Planning Document and the Botley Road Retail Park Development Brief 2022. The City Council will be proactive in producing additional local design codes or guidance when a need arises involving the local

community and landowners and will support neighbourhood planning groups who wish to produce design guidance for their areas.

In recognition of the significance of Oxford's heritage, and as part of its positive approach to the historic environment, in addition to fulfilling its statutory duties, the Council will:

a) identify, conserve and enhance local heritage assets;
b) take a proactive approach to the protection, promotion and interpretation of the city's archaeological remains;
c) support the conservation and appreciation of key characteristics of the wider townscape and landscape; and
d) take a positive strategy towards assets that are considered at risk.

INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENTS

1.17 To deliver the Local Plan vision for 2040, the spatial strategy and plan objectives, the provision of infrastructure will need to be funded and delivered in a timely manner to support development. It is important to ensure that roads, local services and supporting infrastructure such as energy supply, water supply and wastewater treatment can cope with the increased demand resulting from development proposed in the Plan. It can also assist contributing to the city's environment and community facilities, including spaces for sport and recreation, cultural facilities and historic assets, particularly those whose future might otherwise be at risk.

1.18 Key considerations for the policy:

- Where new development creates a need for new and improved infrastructure, contributions from developers and delivery of infrastructure will be sought to make the development acceptable in planning terms. These may be delivered as part of a Section 106 (S106) agreement, a S278 agreement, or through Community Infrastructure Levy (CIL) funds.
- Contributions from a particular development must be fairly and reasonably related in scale and kind to the contribution to the cumulative impact from the relevant scheme; and if necessary, address any unacceptable short-term problems.
- The City's current infrastructure requirements can be found in the Infrastructure Delivery Plan (IDP), which includes an Infrastructure Delivery Schedule. The documents identify infrastructure requirements needed to support the proposed development in Local Plan to 2042. The IDP includes key infrastructure projects for transport and physical infrastructure; social and community facilities and green infrastructure to support the city's planned

development needs to 2042. The IDP forms part of the evidence base and is a 'live' document that is regularly updated.

- The delivery of certain infrastructure projects is considered to have wide-reaching improvements and benefits that could be transformational in nature. This includes the county council's core transport schemes involving the introduction of traffic filters and workplace parking levy.
- There are two important rail projects which could be delivered in Oxford within the plan period to 2042. These are the transformation of Oxford Railway Station (incorporating the delivery of East-West Rail), and the re-opening of the Cowley Branch Line (CBL) to passenger trains (and the delivery of stations to service key employment sites in the south of the city such as the Oxford Science Park and Oxford Business Park (now known as ARC Oxford)). These projects would increase the accessibility of these locations to a wider workforce across the Oxford to Cambridge area.
- Enhancements to public transport accessibility in the south-east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area. It is likely that significant funding will be required to deliver these transformational opportunities and certain sites that lie within the Cowley Branch Line and Littlemore Area of Focus (Policy CBLLAoF) will be expected to help contribute to their delivery.

1.19 How the draft policy responds to these considerations:

- The draft policy requires new development to contribute to the delivery, or directly deliver, new infrastructure.
- It also identifies the Infrastructure Delivery Plan as a key source of information, along with other relevant projects which are identified as important to be delivered to support new development in the city.
- The draft policy supports proposals that can enhance the city's rail and bus network, including Cowley Branch Line and Oxford Railway Station.
- Additionally, requirements are set out for developers to engage with key organisations such as infrastructure providers to discuss infrastructure needs and then deliver against those requirements or provide a contribution towards their delivery.

DRAFT POLICY S3: INFRASTRUCTURE DELIVERY IN NEW DEVELOPMENT

The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The

projects required to support the Local Plan strategy are identified within the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be updated to ensure infrastructure information remains up to date and is monitored effectively.

Developers will be expected to engage early with the Council and infrastructure service providers to discuss their requirements. Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the city, opportunities should be taken to maximise infrastructure provision on suitable sites.

Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be expected to mitigate their impact, both individually and cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan.

Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development. Infrastructure identified within the Infrastructure Delivery Plan or through negotiations on individual planning applications will continue to be delivered either through on-site provision or off-site contributions and secured by S106, S278 or other appropriate agreements and the Community Infrastructure Levy (CIL) or its successor as well as other identified sources of funding as set out in the Infrastructure Delivery Plan.

Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project which has been identified as necessary in the IDP, where the council is content that the infrastructure or phase of that infrastructure will be in place within a reasonable timetable from the date of permission.

Proposals to enhance the City's rail and bus network will be supported. In particular, the redevelopment of Oxford Station and additional rail capacity to accommodate services including opening of the Cowley Branch Line (CBL) for passengers.

Proposals for improvements to Oxford Railway Station that increase network capacity, improve the design and quality of facilities and interchange and support the CBL will be supported. Oxford Railway Station should be transformed to facilitate integrated transport with a new entrance on the west, additional secure cycle storage, cycle racks, new bus interchange facilities and new priority public areas.

Enhancements to public transport accessibility in the south-east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations will be expected in order to achieve public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL. These will be tested in accordance with Paragraph 57 of the NPPF.

PLAN VIABILITY

1.20 The Plan must help to deliver development that is viable, and the Local Plan viability study will inform the drafting of the policies. However, in some instances a site may face exceptional costs that could not have been anticipated in the whole plan viability assessment. Setting out the basis for negotiations relating to viability as part of the Plan would help to be clear on priorities and expectations for evidence. Viability testing demonstrates that the policies as drafted are viable, which will continue to reflect the latest policy to ensure that continues to be the case.

1.21 Key considerations for the policy:

- It is anticipated that some new development proposals will have exceptional costs owing to the site conditions, for example land contamination which requires remediation, or transport or educational infrastructure. Assessing these costs is challenging until proper site investigations have been undertaken and we are aware such situations have implications for site viability.

1.22 How the draft policy responds to these considerations:

- Policies of the Local Plan have been tested and are viable. Where viability is an issue, a cascade approach has been included.

DRAFT POLICY S4: PLAN VIABILITY

The policies in the Plan have been viability tested and planning applications that fully comply with them should generally be assumed to be viable.

If the combined impact of the policies in the Plan do result in a site being unable to deliver a viable development and if an applicant can demonstrate particular circumstances that justify the need for a viability assessment, negotiations will take place informed by an open book exercise.

If the applicant can demonstrate the development to be unviable, a cascade approach should be worked through with the City Council until development is viable, looking at first any carbon offsetting, then any low parking and finally affordable housing

The City Council will always expect developers to have considered the financial implications of affordable housing policy requirements, and local market indicators, when purchasing the land for development.

Where it is clearly demonstrated that any offsetting against the targets in Policy R1 Net Zero Buildings in Operation cannot be fully achieved, payments towards energy offsetting should be reduced incrementally until viability is achieved. The development itself must remain free of fossil

fuel use to ensure that it is net zero carbon ready and does not conflict with Net Zero Carbon targets for the city and nationally.

If the development remains unviable and the low car requirement in the parking policy impacts upon site viability, then this must be clearly set out in the planning application, including setting out the site-specific circumstances that lead to it being unviable. In the first instance, allocating spaces to units should be considered. If the development is still not viable, increasing the number of spaces incrementally, up to the maximum parking standards, which will be no more than one space per unit for residential schemes.

If, following the above adjustments to achieve viability, the affordable housing policy is impacting upon site viability, then the following steps in the cascade should be followed:

Affordable housing viability cascade

If on relevant sites (of 10 or more units) it can be robustly proven that meeting the affordable housing policy will make a site unviable, developers and the City Council will work through a cascade approach in the following order until a scheme is made viable.

This cascade seeks to prioritise provision of social rent:

1) firstly, reduce the number of affordable housing units provided by reducing the intermediate housing element only whilst retaining the social rent element in full;
2) secondly, if the development is still not viable, continue to reduce the amount of social rent incrementally until viable.

Robust evidence must be in the form of an independent viability appraisal. The City Council will expect the developer to negotiate on an “open book” basis which relates to the particular site circumstances that have resulted in the development’s non-viability.

CHAPTER TWO

A HEALTHY INCLUSIVE CITY TO LIVE IN

INTRODUCTION

2.1 The National Planning Policy Framework (NPPF) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance.

2.2 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily.

HOUSING NEED AND REQUIREMENT

2.3 Key considerations for the policy:

- Housing need must be established and then planned for.
- The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need.
- The NPPF is clear that the housing requirement set in the local plan may be different to the housing need identified in the Standard Method.
- The local plan should include a housing requirement figure that shows the extent to which identified housing need can be met over the plan period.
- The housing need for Oxford calculated by the Standard Method is currently 1,087. That means that the housing need over the 20-year plan period 2022-2042 is currently 21,740.
- To help address the housing need we need to seek to maximise capacity in line with the strategy of the plan.
- The capacity of the city is highly unlikely to be sufficient to meet need, whatever spatial strategy is in place (even if disregarding all other needs and objectives).
- The surrounding districts of Oxfordshire have incorporated Oxford's agreed level of unmet need to 2036 in their own plans. Discussions will continue about the remaining unmet need to 2042.
- The extant Local Plans for the other Oxfordshire districts are delivering 14,300 dwellings to meet Oxford's previously identified unmet need, as follows:

- Cherwell Local Plan Partial Review: 4,400
- South Oxfordshire Local Plan 2033: 4,950
- Vale of White Horse Local Plan Part 2: 2,200
- West Oxfordshire Local Plan: 2,750

2.4 How the draft policy responds to these considerations:

- Delivery of housing is a priority, and the Local Plan 2042's strategy is to maximise housing delivery while balancing protection of other important land uses.
- The capacity will be calculated in accordance with the strategy and will become the Housing Requirement set out in Policy H1.

Draft Policy H1 is the identified preferred approach from the various options relating to this issue considered in option set 001a of Background Paper 001.

DRAFT POLICY H1: HOUSING REQUIREMENT

Provision will be made for at least 9,851 *(calculation of capacity 2020-2040 March 2024, to be updated)* new homes to be built in Oxford over the plan period 2022-2042 (average of 493 per annum (*previous capacity calculation, to be updated*).

Measures in the Local Plan to promote housing include:

a) making site allocations for housing in this Plan (see Chapter 8: Site allocations);
b) promoting the efficient use and development of land/sites, including highest appropriate densities and building heights in appropriate locations; and
c) prioritising housing across the city and by allowing an element of housing on all employment sites if suitable.

DELIVERING AFFORDABLE HOMES

2.5 One of the biggest issues facing residents in Oxford is the unaffordability of homes, to rent or to buy. Oxford is one of the least affordable places in the country, resulting from a combination of high land values, reducing land availability, and a shortage of homes. This means that housing is so expensive in absolute terms and compared to average salaries, that many people are priced out of the market. The net need for affordable housing in Oxford has been identified in the Specialist Housing Needs Evidence (2025, Iceni) as 709 units per annum, and 458 households within this overall need figure are unable to afford to buy or rent market housing. As such, delivering housing that is genuinely affordable in Oxford is a long-standing priority of the City Council to help ensure that Oxford is a sustainable and inclusive city, with mixed and balanced communities.

2.6 The Government defines affordable housing as comprising Social Rent, Affordable Rent, and intermediate housing (with varying levels of ownership of the home) provided to eligible households whose needs are not met by the open market.

However, the high land and rental values in Oxford mean that some 'affordable' home ownership models are not affordable in Oxford or only benefit a very small portion of households.

2.7 In accordance with the government definition, registered providers and the council currently make provision for the following affordable Housing tenure types in Oxford:

- Social Rent: the most discounted affordable housing type. Rent set at a much lower rate than available on the open market (calculated using the Government's formula)
- Affordable Rent: rent discounted to at least 20% below local market rents This is not considered truly affordable in Oxford because of the high rental prices, which mean that with a 20% discount, market rent levels still exceed Local Housing Allowance levels.
- Other affordable routes to home ownership include shared ownership where a share of the homes is bought (using a mortgage) and the remainder is rented.

2.8 Securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford. In successive Plans the City Council has adopted policies that require the delivery of an ambitious percentage of affordable housing. These contributions – whether onsite or financial – have made a significant contribution to the supply of affordable homes in Oxford, alongside other Council-led initiatives including an affordable housing delivery programme, and the City Council's own Housing Company OX Place. The introduction of the Employer-Linked housing policy in Local Plan 2036 has also contributed to the supply of affordable homes for those working at the hospitals and other key economic sectors in Oxford.

2.9 Key considerations for the policy:

- Provision of affordable housing contributions on-site is important because it helps to alleviate the challenge of finding other sites, provides more certainty, and helps to deliver mixed and balanced communities across Oxford.
- Any contributions should not disadvantage the delivery of sites.
- When on-site provision is not practicable then a financial contribution will be sought, but in the majority of cases on-site provision is preferable.
- Types of development where onsite provision may not be appropriate (so financial contributions are more appropriate), include purpose-built student accommodation or older persons accommodation.
- Viability trends in recent years, suggest that some commercial / employment developments may also be viable to make a contribution towards affordable housing, to help mitigate / address the housing need generated by the additional jobs created.

- The NPPF sets out that contributions should not be sought for sites of less than 10 dwellings (or dwelling equivalent for C2 communal uses such as student accommodation or older persons accommodation).
- It is important to address the overall need for affordable homes but also the right tenures to meet local needs. In Oxford, Social Rent is the only option for many people who are not able to access market housing, or even other tenures of affordable housing, as such it is the priority tenure from contributions, with a lesser proportion provided as intermediate forms of affordable housing.
- First Homes are no longer required by the NPPF so will not be required to be provided as part of the affordable housing element.
- For management purposes, lone social rented units are not very desirable and a number of units together are needed on a scheme.

2.10 How the draft policy responds to these considerations:

- Viability assessment indicates this level of contribution from typical types of residential developments in Oxford is viable (subject to further viability testing).
- Policy prioritises onsite delivery on general residential sites, with tailored approaches for sites delivering purpose-built student accommodation and older persons accommodation. The contributions policy also prioritises social rent tenure.
- A threshold of 10 dwellings (or dwelling equivalent) net gain is applied to all contributions requirements.
- Affordable housing contributions are sought at 40% of the net gain number of units
- Employer-linked affordable housing policy, on specified sites
- Affordable housing contributions from commercial development.

Draft Policy H2 is the identified preferred approach from the various options relating to this issue considered in option set 002a of Background Paper 002.

DRAFT POLICY H2 DELIVERING AFFORDABLE HOMES

Planning permission will only be granted for residential development if affordable homes are provided in accordance with the following criteria:

a) On self-contained residential developments (including for example C3 and C4 but excluding student accommodation and employer-linked housing) where sites* have a capacity for 10 or more homes (gross) or exceed 0.5 ha, a minimum of 40% of units (*provisional requirement, subject to further viability testing*) on a site should be provided as homes that are truly affordable in the context of the Oxford housing market.
b) At least 80% (*provisional requirement, subject to further viability testing*) of the affordable units on the site should be provided as onsite Social Rented dwellings. The remaining element of the affordable housing may be provided as intermediate forms of housing onsite provided that they are affordable in the Oxford market.
c) The affordable homes must be provided as part of the same development (i.e. on site) to ensure a balanced community.

d) Where affordable housing is provided onsite it should incorporate a mix of unit sizes (see Policy H7 on mix of dwelling sizes).

Where the number of dwellings (including conversions and changes of use) proposed falls below the thresholds set out above, the Council will consider whether the site reasonably has capacity to provide 10 or more dwellings that would trigger a requirement to contribute towards affordable housing. This is to ensure that developers may not circumvent the policy requirement by artificially subdividing sites or through an inefficient use of land.

Where an applicant can demonstrate particular circumstances that justify the need for a viability assessment and can, through an open book exercise, demonstrate the affordable housing requirement to be unviable, a cascade approach should be worked through with the City Council until development is viable, as set out in Draft Policy S4.

*site area includes everything within the red line boundary of the planning application, which may include existing properties which are being materially altered.

AFFORDABLE HOUSING CONTRIBUTIONS FROM NEW PURPOSE-BUILT STUDENT ACCOMMODATION (PBSA)

2.11 Many sites for student accommodation could equally be suitable for non-student homes, from which an affordable housing would normally be sought. The exception to this, is where student accommodation is developed within existing university campuses, because market housing would not usually be provided within those sites. As such, this policy seeks affordable housing contributions from new purpose-built student accommodation.

2.12 Key considerations for the policy:

- Any contributions should not disadvantage the delivery of sites.
- Any affordable housing contributions requirement should also take into account the onus placed on the universities by Policy H10 to provide accommodation for their students.
- Onsite provision of affordable housing as part of PBSA developments is seldom achieved owing to management, design, and landownership issues. For example they are typically designed as flats or apartments which would be challenging for registered landlords to manage if the affordable housing units were not in a self-contained block, or if they are within a university campus.

2.13 How the draft policy responds to these considerations:

- Contributions from student developments are sought on a comparable basis to residential schemes i.e. for the equivalent of 10 self-contained dwellings, so that development of sites for residential is not disadvantaged in the market or viability terms, in comparison with student accommodation.
- The Government Housing Delivery Test sets out a ratio of 2.5 student bed spaces to 1 dwelling. Therefore, with the threshold at 10 dwellings for residential development affordable housing contributions, the threshold for student accommodation will be 25 bed spaces (or 10 or more self-contained student units as these are counted in monitoring terms as a dwelling).
- Financial contributions are sought rather than onsite provision of homes.
- Viability assessment indicates this level of contribution from PBSA developments is viable (subject to further viability testing).
- Provision of affordable PBSA bedspaces targeted at students in need of lower cost rent is not considered appropriate because PBSA is - by its nature - provided for students who do not live in the city full time, so affordable PBSA bedspaces would not therefore be addressing the city's affordable housing needs of existing residents.
- Exemptions are set out (developments within existing campuses etc).

Draft Policy H3 is the identified preferred approach from the various options relating to this issue considered in option set 002b of Background Paper 002.

DRAFT POLICY H3: AFFORDABLE HOUSING CONTRIBUTIONS FROM NEW PURPOSE-BUILT STUDENT ACCOMMODATION

A financial contribution will be sought towards the delivery of affordable housing from proposals for new student accommodation of 25 or more student units (or 10 or more self-contained student units). Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate.

Contributions towards affordable housing provision from new student accommodation will not be sought where:

a) The proposal is within an existing or proposed university or college campus site, as defined in the glossary; or
b) The proposal is for redevelopment of an existing purpose-built student accommodation site which at the date of adoption of the Plan is owned by a university, and which will continue to be owned by a university to meet the accommodation needs of its students after the redevelopment.

The contribution will be required only from the number of units creating a net gain. For mixed-use developments which include general housing on the site alongside student accommodation, then a pro-rata approach will be used to determine whether a contribution is required, and how much this should be.

The contribution will be calculated using the formula in Appendix 2.1.

AFFORDABLE HOUSING CONTRIBUTIONS FROM SELF-CONTAINED OLDER PERSONS ACCOMMODATION

2.14 As with PBSA, sites developed for older persons accommodation could also typically also be suitable for residential use, from which affordable housing would have normally been sought. As such, this policy seeks affordable housing contributions from new self-contained older persons accommodation.

2.15 Key considerations for the policy:

- Contributions should be on a comparable basis i.e. for the equivalent of 10 self-contained dwellings so that development of sites for residential is not disadvantaged in the market or viability terms.
- Onsite provision of affordable housing within new developments for older persons such as retirement complexes, is unlikely to be appropriate because of the different housing needs and lifestyles. Management agreements and other restrictions (e.g. car parking) are also imposed which are also not necessarily appropriate to general housing.
- Viability assessment indicates this level of contribution is viable.

2.16 How the draft policy responds to these considerations:

- This requirement only applies to sites where residential development including affordable housing provision could have been otherwise anticipated.
- Viability assessment indicates this level of contribution from self-contained older persons developments is viable (subject to further viability testing).
- Financial contributions are sought rather than onsite provision of homes.

Draft Policy H4 is the identified preferred approach from the various options relating to this issue considered in option set 002c of Background Paper 002.

DRAFT POLICY H4: AFFORDABLE HOUSING CONTRIBUTIONS FROM SELF-CONTAINED OLDER PERSONS ACCOMMODATION
A financial contribution will be sought towards the delivery of affordable housing from proposals for new self-contained older persons accommodation of 10 or more self-contained units. Alternatively, the affordable housing contribution can be provided on-site where both the City Council and the applicant agree that this provision is appropriate. The contribution will be required only from the number of units creating a net gain. For mixed-use developments which include general housing on the site alongside older persons accommodation, then a pro-rata approach will be used to determine whether a contribution is required, and how much this should be.

Where the number of dwellings or units proposed falls below the relevant thresholds set out above to require affordable housing contributions, the Council will consider whether or not the site reasonably has capacity to provide the number of dwellings that would trigger a requirement to make a contribution towards affordable housing. This is to ensure that developers may not circumvent the policy requirement by artificially subdividing sites or an inefficient use of land. This policy will apply to all types of development including conversions and changes of use.

The contribution will be calculated using the formula in Appendix 2.1.

AFFORDABLE HOUSING CONTRIBUTIONS FROM COMMERCIAL DEVELOPMENTS

2.17 Commercial developments can impact on affordable housing needs by encouraging workers in housing need to move to Oxford to take up new jobs generated by the proposed use of the new development. As such this policy explores whether those developments should contribute towards affordable housing provision.

2.18 Historically, the City Council implemented such a policy under the Local Plan 2001-2016, then viability testing indicated the policy was not effective. However, in recent years the viability context for commercial development has shifted in Oxford again with the boom in R&D development outstripping the viability of all other types of developments.

2.19 Key considerations for the policy:

- Subject to viability testing, to see if commercial developments – different types and locations - could deliver contributions in addition to CIL (2025 rates) plus S106 plus Cowley Branch line contributions (where applicable).
- Retail and non-profit making public sector developments, such as those in education and health sectors, should be exempt.

2.20 How the draft policy responds to these considerations:

- Threshold for qualifying developments, so contributions are only sought from major developments (over 500sqm floorspace or 0.5ha site size)
- Financial contributions are likely to be more appropriate than onsite provision
- Contributions should be proportionate reflecting the numbers, types and sizes of affordable dwellings for which an additional need is created.

2.21 In order to respond to these issues, the council is formulating a new policy approach. Three clear options consisting of alternative approaches have emerged as being the most appropriate, although it is recognised there may be other potential approaches. The three options are proposed below.

Policy Option Set H5 sets out the various options relating to this issue. They are considered in more fully in option set 002d of Background Paper 002.

POLICY OPTION SET H5: AFFORDABLE HOUSING: FINANCIAL CONTRIBUTIONS FROM NEW COMMERCIAL DEVELOPMENT

a) Require financial contributions from all major commercial developments
b) Require contributions only from specified sites or uses
c) Do not require affordable housing contributions from commercial developments

EMPLOYER-LINKED AFFORDABLE HOUSING

2.22 Employers in Oxford are facing significant challenges in recruiting and retaining staff as a result of the lack of availability and affordability of housing. There is not only a shortage of homes in Oxford, but also a shortage of homes that are affordable to local people working in Oxford.

2.23 Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely, such as in frontline healthcare, teaching in schools and universities, as well as those working in manufacturing and R&D labs. Many of these workers are unable to afford market housing or even private rented accommodation in the city and find themselves living outside of Oxford with expensive and time-consuming commutes into the city or living in shared accommodation in Oxford that is too small for their needs.

2.24 People with no option but to rent a room in a house-share are prevented from moving on with their lives with a partner or family. In summary, people can be discouraged from taking jobs in Oxford if they cannot afford to live close enough to their place of work, and many employers, including critical services such as the NHS, have recruitment and retention difficulties associated with the lack of affordable housing in Oxford.

2.25 Employer-linked housing is a bespoke approach that was introduced in Oxford in the LP2036, as an additional means to help increase delivery of much-needed affordable housing. The policy provides an alternative means of delivering affordable housing, to supplement the affordable homes delivered via Policy H2.

2.26 It involves housing being developed on specified sites, by specified key employers, in the city to provide a means of delivering affordable housing for their own staff. This allows those employers to help to address their own recruitment and retention issues by providing housing on their own land. A typical example is the NHS providing staff accommodation within the hospital sites. For most of the specified sites, employer-

linked housing will only be one element of use on the site, for example operational hospital uses will be retained on the hospital sites, or schools will be retained alongside residential development.

2.27 Key considerations for the policy:

- Employer-linked affordable housing provides 100% affordable housing, so has different viability challenges to other residential development sites.
- The tenure mix and size of dwellings on employer-linked sites needs to respond to the needs and circumstances of the employees, it is not a one size fits all.
- By exempting these developments from the normal requirements for affordable homes contributions, the City Council is offering a significant opportunity for those employers to help to provide for their own needs and address the needs of employees who may not be able to access traditional affordable housing but are also not able to access market housing for sale or rent.
- It is important that the housing provided through this policy remains affordable in perpetuity.
- Sites and employers should be specified so that the policy is not used to circumvent normal affordable housing contribution policies or the provision of social rented housing.

2.28 How the draft policy responds to these considerations:

- The policy is restricted to specified sites, which have been chosen for their suitability, availability and potential capacity to cater to the housing needs of essential workers.
- The policy allows for 100% of the homes to be employer-linked affordable housing, with no requirement to provide the Social Rented housing that is usually required.
- Application of this alternative approach is dependent on a series of criteria that collectively ensure that benefits truly outweigh the compromises. For example, the employer-linked housing must meet many of the features of traditional affordable housing and be available to a true cross-section of employees and retained as Affordable Rent homes in perpetuity. This can help to address recruitment issues, and also free up Social Rent homes in the rest of the city or places on the housing register.
- It is important that the housing provided through this policy remains affordable in perpetuity and the City Council will secure this through a legal agreement.
- In the event that market housing is also provided on the site then Policy H2 is engaged on the market housing element. The employer-linked affordable housing could then contribute to the requirement for the intermediate element within Policy H2 but could not be relied on to meet the Social Rent tenure requirement within Policy H2.

- In the event that over time, the employer no longer has a need for the employer-linked housing, the legal agreement will also ensure that 50% of the units are transferred to a registered provider or the City Council as affordable housing, with a tenure split that reflects affordable housing Policy H2, and not sold on the open market. This clawback approach will ensure that the city does not lose out on the provision of valuable affordable housing (one of the main objectives of this Plan) through misuse of this policy or changing circumstances over time.

Draft Policy H6 is the identified preferred approach from the various options relating to this issue considered in option set 002e of Background Paper 002.

DRAFT POLICY H6: EMPLOYER-LINKED AFFORDABLE HOUSING

Planning permission will be granted on the following sites for employer-linked affordable housing for rent.

The sites identified as appropriate for employer-linked affordable housing are:

- Campus sites of the colleges of the University of Oxford and of Oxford Brookes University. These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing
- Edge of Playing Fields Oxford Academy
- Edge of Playing Fields Bayards Hill Primary School
- Slade House
- Manzil Way Resource Centre
- Littlemore Mental Health Centre
- Warneford Hospital
- West Wellington Square
- Osney Mead
- John Radcliffe Hospital
- Churchill Hospital
- Nuffield Orthopaedic Hospital

Where this policy is applied, the standard affordable housing requirements of Policy H2 will not apply, except to any market housing element on the site, or under those circumstances identified under criterion h).

An affordable housing approach will need to be agreed with the Council setting out how the proposed affordable homes will be developed and managed by the employers (or by development partners on their behalf) to meet the housing needs of their employees.

All of the following criteria must be demonstrated as part of the planning application and will be secured through the relevant planning permission:

a) The employer has an agreed affordable housing approach in place setting out access criteria and eligibility, rent policy and rent levels, approved by the City Council and with an appropriate review mechanism in place; and

b) 100% of the housing should be available to be occupied by those employees who meet the requirements of the affordable housing approach agreed with the council and be available in perpetuity; and
c) The occupation of the housing will be limited to households where at least one member works for the employer linked to the site (for the duration of their employment). This also applies to social care workers who work for but are not employed directly by Oxfordshire County Council and to some NHS staff; and
d) An occupancy register should be kept and made available for inspection by the City Council at any time; and
e) Planning applications must be accompanied by a detailed explanation and justification of the approach proposed and the mechanisms for securing the requirements of this policy.
f) A legal agreement will be required to secure the benefits of this policy. In addition, the legal agreement will be used to:
    i) agree the allocations policy;
    ii) agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months;
    iii) agree that if the employer decides they no longer have a need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied.

CREATING MIXED AND BALANCED COMMUNITIES

MIX OF DWELLING SIZES (NUMBER OF BEDROOMS)

2.29 The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community.

2.30 Key considerations for the policy:

- Some sites and locations will be more suitable for different types of dwelling.
- Needs may change over time.
- The plan should aim to meet the full variety of needs over the plan period, which includes the need for family housing.
- The relevant evidence base includes consideration of the housing register, its turnover and likely trends, and demographics, household sizes and trends over time.
- Different contexts will better suit different sizes of unit.
- The mix will also affect the density, as higher densities can be achieved with only small units.

2.31 How the draft policy responds to these considerations:

- A range is proposed for flexibility.
- Certain development types are exempt from the mix because it would be difficult to apply, unsuitable or conflict with other aims.

Draft Policy H7 is the identified preferred approach from the various options relating to this issue considered in option set 001b of Background Paper 001.

DRAFT POLICY H7: MIX OF DWELLING SIZES (NUMBER OF BEDROOMS)

Planning permission will be granted for residential development that is demonstrated will deliver an appropriate mix of dwelling sizes that responds to the site context, including local needs, and that results in mixed and balanced communities. Evidence to support the proposed mix should be proportionate to the application and may include evidence from the Specialist Housing Needs Evidence HENA, market demand, design considerations, and should include regard to the housing register and current requirements if the below mix for affordable housing does not apply.

Proposals for 25 or more homes (gross) (C3 residential) or sites of 0.5ha and greater, and which are outside of the city centre or district centres, will be expected to comply with the following mix of unit sizes for the affordable housing element, unless it can be shown not to be feasible (this does not apply to employer-linked affordable housing):

Mix of dwelling sizes for affordable housing (for rent and for ownership):

For affordable rented forms of homes:

Size of dwelling	**% of the affordable housing element**
1 bedroom homes (all 2 person unless by agreement based on specific need.	20-35%
2 bedroom homes	30-45%
3 bedroom homes	25- 30%
4+bedroom homes	5-15%

For affordable rented forms of homes for those 65 and over, the mix should be 45-55% 1 bed and the remainder 2-bed+.

For affordable ownership forms of homes: When there are 10 or more units of affordable home ownership types (excluding employer-linked housing):

Size of dwelling	**% of the affordable housing element**
1 bedroom homes (all 2 person unless by agreement based on specific need.	20-30%
2 bedroom homes	45-55%
3+ bedroom homes	20- 30%
4+bedroom homes	5-15%

LOSS OF DWELLINGS

2.32 There is no specific national requirement for a loss of dwellings policy, but Oxford cannot meet its full housing need and as such it is important to ensure that the existing stock of homes is protected. It is important to which are often under pressure to be subdivided or converted into HMO. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from the longer term private rented sector and/or providing family homes.

2.33 Key considerations for the policy:

- How to ensure the existing housing stock is not permanently lost through conversion to short term lets.
- Lack of available land and sites in Oxford can constrain development of other facilities needed to support the local community, such as those identified below.
- Whether the policy needs to be flexible to allow the loss of a dwelling where it would provide a community facility or support/complement an existing community use in the area.

2.34 How the draft policy responds to these considerations:

- Policy resists any net loss of dwelling, including for short-term lets but allows some flexibility where there are exceptional justifications. This flexibility is important to allow facilities important to the local community to come forward.
- Policy requires that any application for the loss of a dwelling ensures that the layout of the unit remains so that it could be converted back to a dwelling in the future
- Policy ensures that the proposed use is compatible with neighbouring uses and does not give rise to unacceptable impacts on the local area.

Draft Policy H8 set out below is the preferred approach from the various options relating to this issue considered in option sets 001c of Background Paper 001.

DRAFT POLICY H8: DEVELOPMENT INVOLVING LOSS OF DWELLINGS

Planning permission will not be granted for any development that results in the net loss of one or more self-contained dwellings on a site (this includes all HMO that are suitable for occupation by a single household), except in one of the following circumstances:

a) where essential modernisation is proposed to make living accommodation acceptable, and it can be shown that loss of a unit is essential for operational reasons or to secure space standards; or
b) a change of use of a C3 dwelling or dwellings to a non-self-contained C2 extra care, specialist or supported housing, sheltered accommodation or care home is proposed; or

c) a change of use of a dwelling to form a primary care facility, dentist, children's nursery or local community hall or meeting place (Use Class F.2) (defined as a building (or parts of a building) or space that is open and accessible to the local community, providing services or activities that the local community wants and needs).

In such cases, the following criteria should all be satisfied:

d) it must be demonstrated that the layout of the unit retains capacity to be turned back into a residential unit in future; and
e) the scale and nature of the proposed use is compatible with neighbouring uses and with the surrounding area and is not likely to give rise to unacceptable impacts and effects from noise, nuisance, traffic, or on-street parking.

HOUSES IN MULTIPLE OCCUPATION

2.35 The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. For many, Houses in Multiple Occupation (HMO) offer the only available and affordable solution as renting individually or buying a property in Oxford is often too expensive. However high concentrations of HMO can result in changes to the character of the local area and it is therefore important that the supply of this type of home is monitored and controlled.

2.36 Key considerations for the policy:

- The role HMO have in meeting Oxford's housing needs - proportion of Oxford residents who live in this type of housing.
- The definition of HMO and the different types of legislation that govern them.
- Whether HMO need to be managed so as to not be of detriment to the character of the local area.
- Provision of parking and refuse storage areas in HMOs.
- Whether purpose-built HMO are built specifically with the intention of being for student accommodation to circumvent draft policy H9 (location of student accommodation).
- Whether purpose-built HMOs could be allowed because they may help to meet a need for general housing to be more affordable.

2.37 How the draft policy responds to these considerations:

- It recognises the importance of HMO in Oxford and is supportive of HMO but sets criteria to manage how and where new HMOs are allowed
- It includes a threshold to ensure that there is not an overconcentration of HMO in certain streets/ areas of the city.

- It includes a requirement for applications for HMO to comply with good practice guidance on HMO amenities and facilities
- It does not allow new purpose-built HMO as provision of this type of accommodation reduces potential for delivering housing that meets greater needs (such as social rented housing).

Draft Policy H9 set out below is the preferred approach from the various options relating to this issue considered in option sets 003a of Background Paper 003.

DRAFT POLICY H9: HOUSES IN MULTIPLE OCCUPATION

Planning permission for conversions to or new HMO, will only be granted where:

a) the proportion of buildings that are used in full or part as a licensed/ pending licensed HMO, within 100 metres of street length either side of the application site's principal elevation, does not exceed 20%; and
b) the development complies with the City Council's good practice guidance on HMO amenities and facilities, or any equivalent replacement document.

For the purposes of this policy, street length is measured as:

i) 100m either side of the mid-point of the principal elevation of the proposed development, including principal elevations that wrap around corners or that are broken by a road or footpath; and
ii) 100m either side directly opposite the mid-point of the principal elevation of the proposed development, including principal elevations that wrap around corners or that are broken by a road or footpath; and
iii) all buildings opposite the principal elevations described above.

Appendix 2.2 illustrates how this will be applied.

Applications for changes from C4 HMO to a Sui Generis HMO must be compliant with point b above.

New purpose-built HMO will not be permitted.

PROVIDING FOR specialist housing needs

2.38 The NPPF requires local planning authorities to plan for the needs of groups with specific housing requirements; these include but are not limited to, those who require affordable housing, families with children, older people, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. The Planning Practice Guidance (PPG) also states that policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on a campus.

LOCATION OF NEW STUDENT ACCOMMODATION

2.39 It is important to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing.

2.40 Key considerations for the policy:

- Additional student accommodation will be needed to meet the needs of student accommodation.
- That demand for student accommodation places increases pressure on the housing stock as students may need to compete for general market housing
- Development of new student accommodation may prevent sites being delivered for other types of housing and may lead to a dominance of student accommodation (resulting in less availability, increased prices loss of opportunities to bring forward affordable housing and meaning a high proportion of transient occupants in an area, and an established community that becomes more fractured and less strong).
- Not all types of students have the same accommodation needs or impacts on the community, for example post-graduate researchers and those on vocational courses tend to be working alongside their course and student halls may not be suited. Some students may already live in or near the city at home, and they do not need accommodation.
- Student accommodation is generally not used for every week of the year, giving opportunities for efficient use of student accommodation outside of semester or term-time, if well managed.
- New student accommodation could have the potential to significantly increase the number of cars being brought into the vicinity of new development.

2.41 How the draft policy responds to these considerations:

- It allows student accommodation to be delivered only in the most suitable areas such as adjacent to existing campuses and within the city centre and district centres. These locations ensure student accommodation does not result in unacceptable changes in character and great increases in activity along quieter residential streets.
- It limits occupation of new student accommodation to full-time students enrolled on courses of one academic year or more.
- It is slightly more flexible to post-graduate accommodation than graduate accommodation.
- Not restricting use of the building outside semester or term-time, by allowing it to be used by short-stay visitors.

- It requires larger schemes to include indoor communal amenity space for students to gather and socialise, which should minimise impacts outside the accommodation.
- It allows only operational and disabled parking for new student accommodation.

Draft Policy H10 set out below is the preferred approach from the various options relating to this issue considered in option sets 003b of Background Paper 003.

DRAFT POLICY H10: LOCATION 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.

In addition, if purpose-built postgraduate accommodation already exists at a particular location, subject to meeting criteria a) to e) below, new purpose-built postgraduate accommodation will be granted planning permission adjacent to existing postgraduate accommodation.

Planning permission will only be granted for student accommodation if:

a) Student accommodation will be restricted in occupation to full-time students enrolled in courses of one academic year or more, subject to the provisions of criterion e below; and
b) For developments of 25 or more bedrooms, the design includes indoor communal amenity space for students to gather and socialise; and
c) A management regime has been agreed with the City Council that will be implemented on first occupation of the development (to be secured by a planning obligation); and
d) The development complies with parking standards that allow only operational and disabled parking, and the developer undertakes and provides a mechanism to prevent residents from parking their cars anywhere on the site, (unless a disabled vehicle is required), which the developer shall thereafter monitor and enforce; and
e) A management strategy is agreed if it is intended there will be occupants other than students meeting the definition set in criterion a) outside of term times.

Planning permission will not be granted for development that would lead to the loss of student accommodation linked to an educational institution unless new, alternative student accommodation is available for occupancy, within a reasonable and acceptable timeframe, by students of the same institution. New accommodation should be equivalent in amount, mix and affordability to the rooms being lost.

*An existing university or college campus or academic site is one that exists at the time the Plan is adopted

LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

2.42 Higher education institutions offer courses for students of 18+, many of whom move to live in the city and therefore generate additional accommodation needs. Not all expansion of these institutions will create additional accommodation capacity for students, so institutions may be able to set out in the first instance that their proposals for academic or administrative accommodation will not generate an associated increase in capacity for student residences. Where that is not the case, it should be demonstrated that the additional students may be accommodated through provision of additional student accommodation. Presently, this is managed by setting individual thresholds for each university restricting the number of students permitted to be living outside of university-provided accommodation (or in the case of Oxford Brookes, other purpose-built accommodation), based on evidence including recognising and responding to the forecast needs of each institution. Work is currently being undertaken to establish what threshold levels should be set in this Local Plan.

2.43 Key considerations for the policy:

- Ensuring that new academic floorspace does not generate an increase in student numbers that cannot be accommodated within university-provided accommodation.
- Not all students have the same needs, for example those on vocational courses with work placements away from Oxford (e.g. student teachers, nurses) would not require accommodation for that period, and postgraduates may have different needs to undergraduates.
- Reconsidering the threshold levels for each institution and whether these are still appropriate or should be amended based on the latest forecasting needs for each university.
- Long-term forecasting tends to be less reliable as many factors that inform the data could change, including the unpredictable nature of the economy. Therefore, there is a need to establish whether the threshold is set for the first five years of the plan period and negotiated after that date based on the latest evidence at that time, or whether the thresholds apply for a longer duration.

2.44 How the draft policy responds to these considerations:

- The draft policy will only permit new, redeveloped or refurbished academic, research or administrative facilities, if it can be demonstrated that any increase in students resulting from improved academic facilities will be matched by increased accommodation provision.
- Acknowledges that it is not appropriate for all categories of student to be included within the threshold by limiting it to the number of full-time taught course students living in Oxford requiring accommodation.

- The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and affordable housing which is a priority for this Plan. Further work is also being carried out to determine what the appropriate duration of the threshold levels should be, and whether they should be reconsidered during the plan period.
- Ensuring that existing student accommodation sites are not lost to other uses and that any loss, must be provided for by at least an equivalent amount of new student accommodation.

Draft Policy H11 set out below is the preferred approach from the various options relating to this issue considered in option sets 003c of Background Paper 003.

POLICY H11: LINKING NEW ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Planning permission will only be granted for new redeveloped or refurbished academic, research or administrative facilities for higher education institutions where it can be demonstrated that either:

a) The new facilities would not generate or facilitate any increase in student numbers; or
b) There is a plan in place for managing the accommodation needs of the additional students, either because the institution has sufficient existing accommodation, or because sufficient accommodation has been identified as being available. For Oxford Brookes University and the University of Oxford this criterion will be measured and can be demonstrated through application of the threshold of the number of qualifying students living outside of relevant student accommodation, as follows.

University of Oxford

Planning permission will only be granted for new/redeveloped or refurbished academic or administrative facilities that generates or facilitates an increase in student numbers) for University of Oxford where the number of full-time taught course students living in Oxford requiring accommodation does not exceed the level of university owned or managed accommodation by more than the following thresholds at the time of the application:

- Until the academic year starting in 2033: 2,500
- Academic year starting 2033 onwards to be negotiated based on consideration of the situation at the time.

Oxford Brookes University

Planning permission will only be granted for new/redeveloped or refurbished academic or administrative facilities (that generates or facilitates an increase in student numbers) for Oxford Brookes University where it can be demonstrated that the number of full-time taught course students living in Oxford requiring accommodation does not exceed the level of university owned or managed accommodation or known purpose-built student accommodation by more than the following thresholds at the time of the application:

- Until the academic year starting in 2033: 5,750
- Academic year starting 2033 onwards to be negotiated based on consideration the situation at the time.

The reference to full time, taught course students requiring accommodation excludes those students who were resident in Oxford before applying to study at the university and who continue to live at their pre-application home address while studying.

HOMES FOR TRAVELLING COMMUNITIES

2.45 The Council has worked collaboratively with neighbouring authorities on the assessment of need for accommodation for Gypsies, Travellers and Travelling Showpeople. The assessment was published in 2024 and sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42. This includes taking into account waiting lists and whether there are members of the travelling community living in bricks and mortar.

2.46 Key considerations for the policy:

- The 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.
- No allocations are required because a need hasn't been established, but if this accommodation type comes forward it is important the plan provides a criteria for assessment.
- The needs of travelling showpeople should be considered separately, recognising their different requirements.

2.47 How the draft policy responds to these considerations:

- It is a criteria-based policy that provides a framework for assessing planning applications for these types of specialist housing.
- Gypsies and Travellers and Travelling Showpeople are defined as two separate groups with different criteria applicable to each.

Draft Policy H12 set out below is the preferred approach from the various options relating to this issue considered in option set 003d of Background Paper 003.

DRAFT POLICY H12: HOMES FOR TRAVELLING COMMUNITIES

Proposals for permanent or transit residential pitches or yards for Gypsy, Traveller, or Travelling Showpeople in Oxford will only be granted planning permission where all of the following criteria are met:

a) The applicant or updated Council evidence base has adequately demonstrated a clear need for the pitch/yard in the city, and the number, type, and tenure of pitches/yards proposed, which cannot be met by a lawful existing or available allocated site; and
b) The pitch/yard is accessible to facilities and services including local shops, healthcare, education and employment by walking, cycling and public transport; and
c) The pitch/yard has safe and convenient vehicular, pedestrian and cycle access, including adequate access for emergency services and the other types of vehicles that could reasonably be expected to use or access the pitch/yard; and
d) Proposals make adequate access to or provision for essential on-site facilities that meet best practice for modern Traveller pitch/ yard requirements, including, play areas, and provision for servicing including water supply, electricity and recycling and waste management (and for Travelling Showpeople space for the storage and maintenance of equipment appropriate to their business activities): and
e) The pitch/yard will provide an acceptable living environment and the health and safety of the pitch/yard's potential residents should not be put at risk. Factors to take into account include: flood risk (pitch/yard should not be located in Flood Zone 3a or 3b), site contamination, air quality, and noise; and
f) The pitch/yard is located, and can be managed, so as not to have unacceptable adverse impact on the amenity of nearby residents or other existing uses, or the appearance or character of the surrounding area. Appropriate boundary treatment and landscaping should be capable of being provided.

HOMES FOR BOAT DWELLERS

2.48 Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. There are also boat-dwellers whose transitory nature generates a significant demand for temporary moorings, including those who identify as Bargee Travellers, as well as those who continuously cruise through Oxford and neighbouring areas. The Council has worked collaboratively with neighbouring authorities on the assessment of need for accommodation for boat dwellers. The assessment was published in 2024 and sets out the need for residential moorings for each authority from 2023/24 until 2041/42.

2.49 Key considerations for the policy:

- The analysis of houseboat need in the 2024 assessment suggests that there is additional need for residential moorings across waterways in Oxfordshire, the majority in Oxford with a range of 20-50 additional moorings.
- There is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.
- If sites do come forward, it will be important that there is a a criteria-based policy to assess them against.
-

2.50 How the draft policy responds to these considerations:

- It is a criteria-based policy that provides a framework for assessing planning applications for these types of specialist housing.

Draft Policy H13 set out below is the preferred approach from the various options relating to this issue considered in option sets 003e of Background Paper 003.

DRAFT POLICY H13: HOMES FOR BOAT DWELLERS

Planning permission will only be granted for new residential moorings on Oxford's waterways where all of the following criteria are met:

a) Proposal does not impede navigation, navigational safety, or operational requirements of the waterway including use of footpaths;
b) Proposal will maintain or enhance the amenity, visual character, water quality, historic and ecological value of the waterway or nearby land;
c) Proposal is close to existing services and amenities including potable water, electricity and waste disposal;
d) Proposal is served by adequate pedestrian/cycling access and public transport facilities and services including shops, healthcare, education and employment, and vehicular access for emergency vehicles; and
e) Proposals have investigated impacts of flood risk and addressed provision for safe access/egress and/or evacuation plans where appropriate.

OLDER PERSONS AND SUPPORTED ACCOMMODATION

2.51 The NPPF lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a wide variety of different housing types to support the elderly and those with additional needs. Nationally, the population is ageing and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8% in the South East), the population of those 65+ in Oxford is expected to grow 41%-44% by 2042 (representing 7,900-8,500 additional people in this age range). Therefore, it is important to ensure that the needs of older people are considered. The Oxfordshire County Council Specialist Housing Need Assessment 2024 gives a recent picture of need for supported housing in Oxford Updated Specialist Housing Needs Evidence.

2.52 Key considerations for the policy:

- There is an anticipated net need of housing with support in Oxford to 2042 of 643 units, 40 of which are market and the rest affordable. For housing with care, the net need to 2042 is 496, with 320 of those market, and for care homes the need is 271.
- For market accommodation, it is expected that the market will respond by bringing forward specialist housing types.
- To be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to justify the on-site staff and facilities.

- Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.
- People in this housing type may have limited mobility and it is important it is located in accessible locations so people do not become isolated.
- It is important the plan includes criteria to enable the assessment of this use should it come forward.

2.53 How the draft policy responds to these considerations:

- Provision of new extra-care and elderly persons' accommodation is generally supported.
- The criteria are intended to ensure that supported accommodation is well designed, with good access to local facilities, and that it is well integrated into a mixed community.

Draft Policy H14 set out below is the preferred approach from the various options relating to this issue considered in option sets 003f of Background Paper 003.

DRAFT POLICY H14: OLDER PERSONS AND OTHER SPECIALIST ACCOMMODATION

Planning permission for accommodation for older people and supported and specialist care will only be granted where it:

a) Is located with good access to local facilities and services including public transport, shops and healthcare facilities; and
b) Is located close to or as part of a mixed community and will contribute positively to the creation and/or maintenance of mixed and balanced communities; and
c) Is appropriate for the neighbourhood in terms of form, scale and design; and
d) Includes internal rooms and design, gardens and amenity space of appropriate size and quality for residents; and

Planning permission will not be granted for the loss of existing specialist care accommodation unless it can be demonstrated that provision is to be replaced or that there is a not a need for the facility. This may be secured by a legal agreement.

SELF BUILD AND CUSTOM HOUSEBUILDING

2.54 The NPPF whose housing needs should be understood and attempted to be met. It also states self-build and custom housebuilding.

2.55 Key considerations for the policy:

- The level of interest/demand for this type of housing in Oxford– ascertained from the Self Build and Custom housebuilding register in place since 1 April 2016.

- The number of people with a local connection to Oxford on the self-build register.
- Whether it is feasible for residential development sites in Oxford to accommodate self-build and custom housebuilding plots.
- Whether any thresholds are needed within the policy for example site size, tenure of proposed dwellings (market sale, shared ownership, market or affordable rent, rent to buy, or a combination of these) and how this could impact on development viability
- Whether a time limit could be added to ensure that any self-build plots marketed but not sold over a specified time period could be built and bought forward as dwellings in the normal way
- Consideration of required infrastructure for plots (e.g. utilities, drainage, access)
- Consideration of any requirements for outdoor amenity space
- Consideration of bicycle and car parking standards
- Whether the absence of a policy supporting this type of accommodation could result in individuals and organisations seeking to build/develop this type of housing outside of the city boundary.

2.56 How the draft policy responds to these considerations:

Supports this type of housing to come forward

- Sets a threshold to meet identified need (threshold informed by housing trajectory to ensure that sites come forward for development within the Plan period).
- Requires plots to be made available as part of the market housing element of the scheme, unless conditioned to be brought forward as housing that meets the affordable housing definition.
- Includes a requirement for legal agreements to ensure that if self-build plots have not sold after a certain time period they will be bought forward for housing in the normal way. Note there are some development types that this would not apply to.
- Includes requirements to ensure that self-build plots have access to services, infrastructure, outdoor amenity space and parking provision in accordance with other policies of the plan.

Draft Policy H15 set out below is the preferred approach from the various options relating to this issue considered in option sets 003g and 003h of Background Paper 003.

DRAFT POLICY H15 SELF-BUILD & CUSTOM HOUSEBUILDING

Proposals for self-build and custom-build housing will be supported as a way of enabling people to meet their own housing needs.

On residential sites of 100 homes or more, 5% of the site area developed for residential use should be made available as self-build/custom-build plots. Plots will be part of the market

housing element of the scheme, unless they are conditioned to be brought forward as housing that meets the affordable housing definition.

Plots should have services (water, foul drainage and electricity supply) to the boundary and access to the public highway. Plots should also have surface water drainage, telecommunications services, and access to a fuel or energy source in line with policy R1.

A legal agreement will be used to ensure that if the self-build plots have not sold after 6 months of marketing, then dwellings should be built and brought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.

The following development types are excluded from this requirement: Employer-linked affordable housing; student accommodation; other C2 or Sui Generis types of accommodation; and residential development in conversions or on brownfield sites where only flatted development is provided.

Community-led housing

There are several organised groups with ambitions for providing community-led housing in Oxford. Proposals for community-led housing will be supported because of the benefits they are expected to bring in terms of community cohesion, permanent affordability and sustainable development. Community-led housing will not necessarily meet the requirements for self-build or custom build housing, but has potential to if the community-led housing group will have the primary input into the final design and layout.

BOARDING SCHOOL accommodation

2.57 There is no national policy or guidance on boarding school accommodation development. However, the Oxford brand is a strong market draw for this sector. In Oxford's context where there is a very large housing need and where boarding schools may well compete for sites that could be suited to this priority need, it is important to provide a policy framework.

2.58 Key considerations for the policy:

- This type of development could result in the loss of dwellings through change of use to boarding accommodation.
- This type of development may come forward on sites that may otherwise come forward for housing.
- Lack of available land and sites in Oxford can constrain development of other facilities needed to support the local community.
- The location of the new boarding development may affect the safety and amenity of students and local residents and neighbouring residential properties.
- There may be traffic implications, depending on the location of the accommodation and how close it is to the teaching campus.

2.59 How the draft policy responds to these considerations:

- The policy requires that development would need to be on or adjacent to a teaching campus of the school the students will attend. This is to:
    - Reduce competition for sites with housing, prioritising delivery of general housing;
    - Reduce amenity and neighbourhood impacts by linking boarding accommodation to the teaching campus;
    - Help ensure safe provision for students;
    - Minimise transport impacts.

Draft Policy H16 set out below is the preferred approach from the various options relating to this issue considered in option set 003i of Background Paper 003.

DRAFT POLICY H16: BOARDING SCHOOL ACCOMMODATION

Proposals for new or extended boarding school accommodation for children ages 18 and under can be supported where it is on or immediately adjacent to a main teaching campus of the school the children will attend and it is in accordance with the other policies of the Development Plan.

CHAPTER THREE
A FAIR AND PROSPEROUS CITY WITH A GLOBALLY IMPORTANT ROLE IN LEARNING, KNOWLEDGE AND INNOVATION

INTRODUCTION AND WIDER CONTEXT

1.1 Oxford's economy makes a vital contribution to the regional and national economy. It is a well-known city with a global reputation which reaches far beyond expectations based on its size. It is influential and has its own well established and unique brand. Oxford is also highly sustainable location for employment in Oxfordshire and the south-east. Enhancements could be made to the already sustainable transport system to take people to jobs here rather than if employment is scattered to less sustainable locations. A concentration of employment in a sustainable location is better than dispersed employment relying on the private car. In particular, the city's economy is shaped by the presence of its two successful universities.

1.2 Oxford is also a major centre for teaching hospitals and is home to several acute and specialist medical research organisations. Oxford is an attractive location for a range of companies and is in a position to foster home-grown spin-out businesses due to existing research capabilities, the ready supply of graduates and the clustering effect of organisations with close ties in a number of related areas being closely located with one another. Work that's happening in Oxford has helped and continues to address global problems such as the Covid pandemic and climate change.New employment floorspace is being driven by occupier requirements associated with research and development supporting key sectors including life sciences. New lab-enabled office space is being delivered at pace to meet market demand and provide built-in flexibility for future occupiers. The strength of the commercial market in Oxford is notable This type of floorspace is coming forward both inside and outside the city centre and results in premium rents regardless of its location. Its delivery supports inward investment and the continued development of university-related spin out companies.

1.3 Recent government announcements (January 2025) to support the delivery of the Oxford to Cambridge Growth Corridor include the establishment of a new growth commission for the city. This will help Oxford by providing a clear strategy to deliver the housing and infrastructure needed to allow the city to realise its economic potential. Manufacturing still plays an important role in the city's economy and Oxford sits at the centre of a £6bn

automotive cluster, dubbed 'Motorsport Valley', while MINI Plant Oxford is a major industrial employer in the city. MINI Plant Oxford accounts for nearly half of all industrial space city-wide. Furthermore, retail and 'third sector' jobs in Oxford also make an important contribution to the economy. In addition, the visitor economy makes a meaningful contribution to the city's economy. According to Experience Oxfordshire's Economic Impact of Tourism Report for Oxford (2022), the city's visitor economy generated more that £645million of visitor spend and saw just under 6.5 million visitors (the majority – more than 5million - being day-trippers). While these levels are not yet back to pre-pandemic figures, the visitor economy in 2022 accounted for approximately 12% of all employment in the city.

1.4 Oxford also heavily influences the wider regional economy. Indeed, Oxfordshire's wider economic vision and strategy are set out in a series of documents produced by the Oxford Local Enterprise Partnership (OxLEP). These include the refreshed Strategic Economic Plan (2023) and the associated Strategic Economic Plan 'Action Plan' (2024). The Strategic Economic Plan sets out a long-term vision and ambitions for economic growth across the county. This aligns with Oxfordshire's agreed Strategic Vision, which was adopted by all six Oxfordshire Councils in 2021, and recognises the importance of local and global innovation, collaboration and inclusive thinking to deliver real and lasting change in ways that build resilience and enhance environmental, social and economic wellbeing.

1.5 Economic diversity can provide a more stable path to equitable growth and development. In this way, providing support for Oxford's economic assets should both protect employment uses that are vital to the city's local economy while also encouraging appropriately located high value uses which contribute to the national (and even the global) economy. In a constrained city such as Oxford, with limited physical space for new development, it is important to make the best and most efficient use of land to deliver this strategy.

EMPLOYMENT STRATEGY

1.6 Oxford's employment land strategy has previously been to focus new employment development towards sites already in, or allocated for, employment-generating uses. It also supports the delivery of employment-generating uses in inherently sustainable locations namely within the city and district centres. An approach to modernise and intensify existing employment-generating uses at these locations has also been supported through previous plans. While certain employment sites (recognised for the contribution they make to the local and national economy) have also been afforded policy protection against their loss to other uses.

1.7 However, a change to the national use classes order means that existing brownfield sites in Use Class E now benefit from permitted development rights that allow changes of uses

with providing there are no alterations to the building itself. As such, sites like Botley Road Retail Park are experiencing a transition and transformation away from retail uses towards R&D, laboratory and grade A office space – employment sectors that support Oxford's key economic strengths. This national change to permitted development has brought both challenges and opportunities, although overall it must be recognised as benefiting the economy of Oxford and will need to be taken into account.

1.8 Key considerations for the policy:

- Recognise Oxford's strengths, dynamic economy and potential for growth
- Make provision for the identified employment land needs.
- Ensure the aims of the wider economic vision and strategy are reflected.
- Needs to support addressing barriers to investment and growth (i.e., housing and infrastructure issues).
- Needs to consider the protection of employment sites.
- Needs to support employment sectors relating to Oxfords' key economic strengths.
- Needs to support SMEs, start-ups and important local businesses/ employers.
- The best way to respond to the housing crisis in Oxford, balanced against responding to the successful economic situation.
- It is important that best and most efficient use is made of all land in Oxford. To do this requires careful consideration of which sites it is appropriate to protect, and where new development should be located.

1.9 How the draft policy responds to these considerations:

- The degree of protection of employment sites is to be varied in accordance with overarching strategy of the Plan
- Given the potential for use of existing large employment sites to be intensified significantly to meet needs, the allocation of new sites outside of existing centres that are not currently in commercial use or allocated for employment is not likely to be justifiable.
- However, there are employment sites in the city which are less well located, and which do not have such an important role in supporting the sectors referred to in the NPPF or recognised as vital to supporting Oxford's economic strengths.
- Policy approach to encourage modernisation and intensification of existing sites in suitable locations to meet as much identified employment land need as possible on existing employment sites.
- Policy to support a flexible approach to support a range of appropriate uses
- Housing on at least an element of employment sites is encouraged

Draft Policy E1 is the identified preferred approach from the various options relating to this issue. It is considered within the four options sets 004a-1 to 004a-4 of Background Paper 004.

DRAFT POLICY E1: EMPLOYMENT STRATEGY

All new development on employment sites needs to show that it is making the best and most efficient use of land and premises, positively promotes sustainable development and does not cause unacceptable environmental impacts.

New employment-generating uses and intensification of existing sites:
The only locations that are suitable for new employment-generating uses are existing employment sites and the city and district centres. Planning permission will not be granted for proposals for employment-generating uses outside of these locations.

Planning permission will be granted for the intensification and modernisation of any Key Employment Site (i.e., recognised for the contribution that they make to the national or local economy or the social value that they bring to an area).

Planning permission will only be granted for the intensification and modernisation of all other employment sites where that site is located within the city or a district centre. Outside of these locations, non-designated employment sites can only be regenerated for employment purposes if better and more intensive use is made of the site through the redevelopment, up-grading or re-use of existing under-used buildings. Proposals for additional employment floorspace on non-designated employment sites outside the city and district centres must follow the sequential approach for new town centre uses as set out in Policy C1.

Key Employment Sites are listed in Appendix 3.1 and are shown on the policies map. All other employment sites are non-designated employment sites.

Loss of employment floorspace and the use of employment sites to support housing delivery
Planning permission will not be granted for development that results in a net loss of employment floorspace on Key Employment Sites unless it can be fully justified where:

a) number of jobs in employment-generating uses is retained; and
b) the employment use can be maintained.

Planning permission will be granted for the loss of any non-designated employment sites to other uses, proposals for housing will be supported.

Proposals involving housing at Key Employment Sites and on non-designated employment sites will be assessed by a balanced judgement which will take into account the following objectives:

c) meet as much housing need as possible in sustainable locations;
d) avoid the loss of, or significant harm to, the continued operation or integrity of successful and/ or locally useful, business and employment sites;
e) create a pleasant residential environment that provides an acceptable level of amenity for future occupiers;
f) create a sense of place that is well-connected by safe walking and cycling routes to shops, schools, open spaces, and community facilities and that is well-served by public transport;
g) secure environmental improvements

h) avoid locating residential uses in close proximity to existing businesses that may create noise, smells or other potential disturbances as part of the day-to-day operations.

WAREHOUSING AND STORAGE USES

1.10 New large scale B8 uses are usually low-density and do not generally make for an intensive land-use. As a small, compact and constrained city, there are numerous competing pressures for land in Oxford. This means that there is often a need to make the best, or most efficient use of any land that becomes available. As such, new B8 uses are not always the most appropriate use for land within the city. However, these uses are sometimes needed to support the ongoing operation of larger employment sites. Therefore, the proposed approach to supporting warehousing and storage uses in the Local Plan 2042 is therefore proposed to be limited to where the B8 use is essential to supporting the operational requirements of a key employment site. Whereas the loss of B8 on any employment site is supported providing the B8 use is not essential to the support of a key employment site.

1.11 One key aim of the Local Plan 2042 is to support Oxford's transition to a zero-carbon future. The Zero Carbon Oxford Partnership has produced a roadmap and action plan highlighting a number of important actions to help deliver a successful transition to Zero Carbon living by 2040 including to pilot "a number of freight consolidation centres around the edge of Oxford". It is important that the Local Plan 2042 policy approach does not prevent this from taking place as it most likely that these sites suitable for B8 uses could be considered as a suitable location for such centres.

1.12 Key considerations for the policy:

- These uses have a low job density and high demand for land, which can make them unsuitable in a compact city with competing pressures for development
- These uses often need good access to the strategic road network
- Nevertheless, these uses can be useful in supporting local employers in sectors such as manufacturing
- Can support key employers to maintain their supply chain
- Within consolidation centres goods are grouped together so that fewer delivery journeys are required by road, thus reducing air pollution, congestion and noise across Oxford.

1.13 How the draft policy responds to these considerations:

- Policy sets out particular circumstances when these uses would be allowed, i.e. if it is part of or there is a specific link to a key employment site.
- Policy allows the loss of these uses where they are not essential to support a protected employment site.

- Policy makes a specific commitment to work with partners to support consolidation centres

Draft Policy E2 is the identified preferred approach from the various options relating to this issue considered in option set 004b of Background Paper 004.

DRAFT POLICY E2: WAREHOUSING AND STORAGE USES

Planning permission will only be granted for new or expanded warehousing and storage uses if it is within an existing Key Employment Site and where it can be demonstrated in the planning application that the use is essential to support the operational requirements of that key employment site.

Planning permission will be granted for the loss of B8 space (on any category site) where it is not essential to support a Key Employment Site.

In all cases the suitability of the proposed use will be assessed against the site-specific circumstances.

The Council will work with partners to promote the use of freight consolidation centres where possible.

COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS

1.14 Community Employment and Procurement Plans (CEPP's) can significantly improve job opportunities for local people and support both the local labour market and the businesses that operate in Oxford or wish to move to the city.

1.15 Many people in Oxford are highly qualified. This is reflected in the number of science and knowledge-based jobs that relate directly to the city's economic strengths by supporting key sectors that supporting the economy. However, this positive picture masks the challenges faced within Oxford. Parts of the city contain large numbers of local people with few to no qualifications, or who are working but on low earnings.

1.16 Continuing pressure to develop land in the city creates an opportunity to support local people access training, education and apprenticeships. Oxford has a challenging labour market with different sectors competing for jobs. Skills and training for the local workforce is important for businesses to drive economic growth, productivity and provide services, but equally helps to deliver wider economic benefits, social value and well-being for all its citizens.

1.17 The City Council is committed to working in partnership with business and key partners to promote a strong, fair and inclusive economy that delivers greater opportunities and skills for local people.

1.18 Key considerations for the policy:

- Development in the city creates the potential to secure wider benefits for the local community;
- Larger developments likely to be able to support a wider range of objectives;
- Details of what is expected of developers should be set out;
- Details of what developers are expected to provide should be clearly stated.

1.19 How the draft policy responds to these considerations:

- Provide clarity around the expectations for qualifying and non-qualifying developments
- Larger (qualifying) developments offer the potential to deliver commitments within a site-specific CEPP secured by condition or legal agreement;
- Non-qualifying developments offer the potential to deliver a more limited range of opportunities
- An element of flexibility is required to ensure that any commitments that are made can reasonably be delivered by the type of development proposed
- A Technical Advice Note (TAN) will be needed to expand on various aspects of the policy (including advice on how to prepare a CEPP, successful implementation and monitoring)

Draft Policy E3 is the identified preferred approach from the various options relating to this issue considered in option set 004c of Background Paper 004.

DRAFT POLICY E3: COMMUNITY EMPLOYMENT AND PROCUREMENT PLANS

Planning permission will only be granted for proposals of 50 or more homes or over 1,000m^2 non-residential floorspace where they are supported by a Community Employment and Procurement Plan (CEPP). The CEPP must identify the opportunities that will be provided by the development to support the inclusive economy, demonstrate the social value of the proposals and set out how they will be promoted and delivered. CEPPs will be expected to consider all the following criteria:

a) Securing construction jobs for local residents;
b) Providing construction apprenticeships and/ or training opportunities for local residents;
c) Linking with local schools and colleges;
d) Securing jobs in the operational/ end-user phase for local residents;
e) Procuring a proportion of on-going supply chain needs locally;

f) Paying all employees (other than apprentices) the Oxford Living Wage;
g) Only using contractors who commit to paying the Oxford Living Wage or other social clauses appropriate to the development
h) Procuring a proportion of construction materials locally; and
i) Delivery of affordable workspaces.

The City Council will use a condition and/or legal agreement to secure these commitments in accordance with a site-specific CEPP.

Smaller developments, below the threshold for a CEPP, will be expected to provide a written statement in support of their planning application to show what job opportunities, and or skills and training prospects can be delivered during the construction and or end-user phase of the development.

AFFORDABLE WORKSPACES

1.20 Oxford has a successful economy, but its success does bring challenges. The recent demand for more research and development space has seen a significant increase in office rents, which has meant that SME's and Social Enterprises have experienced difficulties in being able to find affordable workspace in the city. The types of employment floorspace coming forward frequently have a very large floorplate, which itself excludes many employment typologies from accessing it.

1.21 The exclusion of SMEs and Social Enterprises would be hugely detrimental because these employment types enable economic diversity and often provide a social or cultural function, as well as supporting innovation opportunities and productivity. SMEs and Social Enteprises help to provide a more robust economy which ultimately supports research and development and other large-floorplate employment types in the city.

1.22 Recognising the valuable contribution that supporting a range of businesses (including SMEs and Social Enterprises) can make to innovation and economic diversity by supporting the delivery of affordable workspace therefore helps to realise the vision for an 'inclusive economy', set out the City Council's Economic Strategy together with Oxfordshire Strategic Economic Plan (2023), which recognises the affordability and supply of workspaces as a key challenge to SMEs.

1.23 The provision of affordable workspace would help a broader range of businesses to have the opportunity to start-up, remain or re-locate within the city. This aligns with the Local Plan economic objective to *recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity*.

1.24 Key considerations for the policy:

- Rising rents and pressure on existing spaces are making it difficult for start-ups, social enterprises and other types of SMEs to find suitable premises in the city. These businesses add diversity to the economy and their future growth as the next generation should be planned for.
- Larger developers/ development sites could help address the need for smaller, flexible, affordable workspaces as part of their masterplans.
- To be effective, affordable/ flexible workspaces should be delivered in accordance with a strategy that identifies the gap or market failure that is intended to be addressed, and that explains how the approach will be beneficial in bridging that gap in terms of the type of workspace to be provided, and the quantum of it.
- Details of marketing arrangements and management of spaces will be important, as are end-user requirements.

1.25 How the draft policy responds to these considerations:

- Larger sites for commercial development (in particular, sites delivering R&D/ office/ Lab space) offer the potential to bring forward affordable/ flexible workspace through an affordable workspace strategy;
- The delivery of affordable/ flexible workspace on-site (through an agreed affordable/ flexible workplace strategy) would add to the economic diversity of these larger sites. The affordable/ flexible workspace strategy should set out details of the size, marketing, servicing and management of the spaces (and would need to be underpinned by a legal agreement/ management plan/ etc.)
- A degree of flexibility of delivery is important however a minimum size of space is likely to be required if it is to make a meaningful contribution to appropriate sectors and appear attractive to third-party operators. Consider using of a qualifying threshold (supported by evidence including viability) for delivering new affordable workspaces.
- Consider whether there are situations where the use of financial contributions, are appropriate in supporting the delivery of affordable/ flexible workspaces.
- A Technical Advice Note will be needed to expand on various aspects of the policy (including what is expected from an affordable/ flexible workspace strategy, details of management arrangements, end-user requirements, etc.).

Draft Policy E4 is the identified preferred approach from the various options relating to this issue considered in option set 004d of Background Paper 004.

DRAFT POLICY E4: AFFORDABLE WORKSPACES

Development proposals delivering commercial development on the following sites are expected to deliver an affordable strategy as part of their masterplans:

- ARC Oxford
- Oxford Science Park
- Oxpens
- Osney Mead
- Nuffield Sites
- Kassam Stadium and Ozone Leisure Park
- Unipart
- Oxford North
- Botley Road Retail Park

Details of the size, marketing, servicing, management and how the space provided will meet end-user requirements, should be set out in an affordable workspace strategy. This should explain how the proposed provision helps to overcome market gaps or failures that would otherwise prevent beneficial workspace typologies coming forward, because of a lack of suitable and/or affordable space.

TOURISM AND SHORT STAY ACCOMMODATION

1.26 Tourism is a significant sector of Oxford's economy with distinct needs and pressures. Oxford is consistently in the top 10 most visited UK overnight destinations for international tourists. Tourists and visitors help support a wide range of facilities and attractions such as theatres, cinemas and the ice rink.

1.27 Oxford's heritage strongly supports the attraction of visitors, the retention of which will assist in ensuring the long-term vitality of the city's economy. Oxford has many short-stay visitors, often visiting for a day or only a few hours, which has fewer benefits for the local economy.

1.28 Policy H8 Development involving loss of dwellings needs to be fully considered when assessing proposals for tourism and short stay accommodation. Tourism and hotel development are 'main town centre uses'. Future growth is therefore subject to a sequential approach directing new development to the city and district centres as the preferred location for these uses.

1.29 Key considerations for the policy:

- Visitors (both for leisure and business) play an important role in Oxford's economy
- Extending visitor stays increases the benefit to the economy

- The city has a good range and diversity of short stay accommodation, but there is strong demand
- Not all locations are suitable for short stay accommodation

1.30 How the draft policy responds to these considerations:

- The policy sets out the locational requirements for the provision of new short stay accommodation, to ensure they are in well-connected locations to minimise traffic impacts;
- The policy generally protects existing larger short stay accommodation (10 bedrooms or more) but not in locations not defined as suitable for new short stay accommodation.
- The policy does not protect smaller short stay accommodation (which generally can struggle to compete) nor does it afford protection to short stay accommodation of any size if it can be demonstrated through market viability evidence that it cannot continue in its current use;
- The policy includes criteria for the expansion of existing accommodation and criteria for seeking to protect the loss of existing short stay accommodation. It does however provide support for the loss of smaller guesthouses and/ or B&B's either to residential use or where it does not meet the locational requirements.

Draft Policy E5 is the identified preferred approach from the various options relating to this issue considered in option sets 004c-1 and 004c-2 of Background Paper 004.

DRAFT POLICY E5: TOURISM AND SHORT STAY ACCOMMODATION

Planning permission will only be granted for the development of new sites for tourism and short stay accommodation in the following locations:

- in the city centre;
- in district centres;
- on sites allocated for that purpose; and
- on Oxford's main arterial roads where there is frequent and direct public transport to the city centre.

Planning permission will only be granted for new tourism and short stay accommodation or for the expansion and or refurbishment of existing accommodation where it meets the following criteria:

a) it is acceptable in terms of access, parking, highway safety, traffic generation, pedestrian and cycle movements; and
b) it does not result in the loss of a residential dwelling as set out in Policy H8; and
c) it will not result in an unacceptable level of noise and or disturbance to nearby residents.

Planning permission will only be granted for the change of use from tourism and short stay accommodation when any of the following criteria are met:

d) the existing property has less than 10 bedrooms and is proposed to be changed to residential use;
e) a property with 10 or more bedrooms, within the City centre, District centre or on a main arterial road would need to provide sufficient robust evidence of non-viability to justify its loss;
f) a property is unsuitable for the use as demonstrated by being contrary to the location requirements or any of the criteria a-c above.

CHAPTER FOUR
A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE

4.1 The draft policies set out in this chapter comprise the key component of the Local Plan's strategy for maintaining and strengthening the city's resilience to climate change, by which we mean ensuring that Oxford to withstand the risks arising from the changing climate, and better able to recover when hazards like flooding or heatwaves occur. The policies set out here will lead to the protection and enhancement of biodiversity across the city and are important for improving health and wellbeing of people and the environment through ensuring access to nature. The chapter is divided into three subsections addressing the topics of green and blue infrastructure; biodiversity and the ecological network; as well as flood risk and climate resilient design.

OXFORD'S GREEN AND BLUE INFRASTRUCTURE

4.2 A key feature that contributes to the special character of Oxford is its close relationship with the natural environment that encircles and permeates the city. The city benefits from a wide range of green spaces such as parks, natural and semi-natural spaces, historic sites, floodplains and sites of importance to biodiversity and nature conservation. There is also an extensive network of more than 248,000 trees of varying age, species and quality that cumulatively comprise the 'Urban Forest' and which provide a myriad of social, environmental and economic benefits. The key waterways are the River Thames, River Cherwell and the Oxford Canal, but there are also many brooks and streams, such as Bayswater Brook and Northfield Brook, which form part of wildlife and movement corridors. Equally, blue infrastructure is interwoven and interlinked with these areas, enhancing the experience and function of it.

4.3 There are three draft policies in this section that relate to the protection and provision of green and blue infrastructure in Oxford. The key considerations that are driving these policies in the Local Plan are as follows:

- Protecting and enhancing a network of green and blue spaces across our city is important for the multitude of benefits they provide for our health and wellbeing and the wider natural environment, including: providing space for recreation and social interaction; improving mental and physical wellbeing; food production; habitat for biodiversity; and ameliorating poor air quality.

- Green spaces and features also help strengthen the city's resilience to climate change, by increasing flood storage and slowing the flow of surface water at times of heavy rainfall (thus mitigating flood risk); but also by

providing cooling benefits and offering respite during heat wave events (thus reducing risks of overheating).

- Whilst Oxford benefits from a wide range of green and blue spaces of varying sizes and typologies, access is unequal across different neighbourhoods of the city as has been shown in the Council's Green Infrastructure study (2022).

- Constraints in the city mean that it is very challenging to create large new areas of green open space and opportunities for new provision will be guided by the specific context of each individual development site. This will often require innovative thinking to make the most efficient use of spaces, and ensure that new provision is designed in a way that can deliver multiple functions at once.

- Equally, existing inequalities in access to green space and limited opportunities to provide new space means that loss of existing green features needs to be carefully considered and resisted wherever necessary.

- Green and blue infrastructure faces a variety of other pressures, from those arising from the need to accommodate new development in a constrained city; to the recreational impacts that occur as people use these spaces, as well as from climate change and pollution.

PROTECTION OF THE GREEN AND BLUE INFRASTRUCTURE NETWORK

4.4 Green Spaces in the city have a varied range of functions. Of great importance is the way these spaces function together as a network. Connections between these features means green spaces can act as movement corridors for both people and nature. Blue infrastructure is particularly important in this linking role, such as the rivers Cherwell and Thames and their embankments, as well as smaller streams and watercourses found throughout the city. It is important that the Local Plan identifies the most important spaces that form the GI network across the city and appropriately protects these from development, alongside other green features like trees.

Key considerations for the policy:

4.5 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- National policy sets out the importance of Local Plans protecting networks of green infrastructure. It also includes protections for open spaces and

guidance for how to assess applications that could result in their losses, as well as other green features like trees.

- However, there are competing pressures for land in the city and existing inequalities in access to open space which could be exacerbated without sufficient protection of key green spaces. Allowing loss of green infrastructure to development can also exacerbate other problems, such as harming health and wellbeing of residents, increasing risk to climate change, and intensifying biodiversity loss.

- Whilst public open spaces can be particularly beneficial, spaces do not have to be publicly accessible to form a vital contribution to green infrastructure network. Many private spaces play an important role for sport and recreation (e.g. pitches). Also, private gardens and non-domestic gardens such as the ground associated with academic institutions, offer valuable opportunities for private amenity and socialising, host a range of green and blue features, as well as making an important contribution to the fabric of the urban realm injecting pockets of natural features that support the amenity of the surrounding public realm.

- Additional protections already apply to land designated as Green Belt which is primarily focussed on preventing the spread of development and the coalescence of urban areas helping to protect the historic setting of the city.
- The GI network is also enhanced by a number of individual features such as trees and hedgerows. Some of these benefit from separate types of protection, for example

- Ancient woodland, ancient/veteran trees and important hedgerows (as defined by the Hedgerow Regulations 1997), which are assigned a high level of protection through national policy.

- A small proportion of trees benefit from TPOs, or protection through conservation areas, though there are many high-quality/valuable trees which are not captured under these designations.

- A range of other individual GI features support the GI network and provide localised benefits to the spaces where they are found particularly in supporting amenity and biodiversity. These include features like ponds, smaller streams, green roofs and walls, as well as hedges, and wild patches of vegetation. As well as in public spaces, these features can be particularly important to the amenity of domestic/institutional gardens (such as gardens associated with private dwellings, care homes, schools and the Universities/Colleges).

4.6 How the draft policy responds to these considerations:

- The draft policy would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts.

- Whilst national policy protects open space, the draft policy seeks to set out additional levels of protection for some green infrastructure in the city. The spaces to be most strongly protected are those that provide a multitude of functions, that are most important to the local area and also those that need to be protected in situ to avoid fragmenting linkages or losing the key benefits they provide (e.g. flood risk or heritage setting). More detail on the proposed hierarchy of protection is set out in box 4.1 below.

- The draft policy sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be reprovided. These will relate to the particular primary function a space is providing and will be of relevance when determining whether a site is 'surplus to requirements', but also in identifying the qualities and sensitivities essential to the function that would need to be addressed. It is likely that the supporting text to the policy would need to expand on these considerations, and an example of what these would likely look like is set out in box 4.2. below.

- Draft Policy G6 sets out additional considerations which apply to developments that would affect designated ecological sites, which also fall within the proposed core GI network under this policy.

- The draft policy also addresses protection of individual features like trees and hedgerows. In relation to trees, a varying level of protection and associated requirements expected in order to justify any loss are assigned through the policy. There will be other considerations for proposals affecting trees, including making use of best practice criteria such as the BS.5837:2012 standards or future equivalent.

- Where applications are proposed within green belt these would be determined in accordance with national policy.

Figure 4.1. - Proposed hierarchy of protection for spaces within the Green Infrastructure network

Recognising that particular spaces and their existing location are especially fundamental to the functioning of a strong GI network, the following hierarchy of GI spaces is proposed to be used:

1. **Core Green and Blue spaces –** designated at highest level in hierarchy due to their fundamental role in supporting the city-wide network through wildlife habitat and

corridor functions, flood storage, intensity of use and strength of heritage or other local value, which means they are not easily moved elsewhere. It is considered that these spaces cannot be moved/reprovided sufficiently without compromising the overall character and function. Some spaces are subject to separate policy protection to reflect the additional considerations that apply here (namely ecological designated sites). *Designated G1A on proposed policies map*.

2. **Supporting Green and Blue spaces –** These spaces play an important role in enhancing the network and its overall function, and their loss will be resisted; however there is more opportunity for reprovision. As such change of use which is accompanied by reprovision to another part of the network, ideally onsite, to the same standard or higher will be accepted. Spaces have only been identified as supporting green and blue spaces if they are clearly carrying out green infrastructure functions; therefore, it is considered to be unlikely that any of these spaces could be found to be surplus, although it is accepted that there could be changes over time. Additional considerations for proposals affecting these types of spaces are highlighted below. *Designated G1B on proposed policies map.*

3. **All other Green and Blue spaces –** these spaces also support the overall network, as well as often helping to enhance the more urban areas of the city by breaking up the built environment with pockets of natural amenity, but are typically smaller and more fragmented, playing a reduced multi-functional role as a result. Change of use will be accepted where it is accompanied by sufficient reprovision, ideally onsite, and to the same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements. Other green and blue spaces are not identified on the proposed policies map.

Figure 4.2. Additional considerations for proposals affecting particular types of spaces that would be set out in supporting text to the policy

It is important to recognise that there may be other specific contextual considerations relating to the type of open space which need to be taken into account in proposals affecting open spaces, aside from level of designation within the network.

As well as making reference to an up-to-date GI or open space study, proposals would need to consider the following when demonstrating compliance with Policy G1, regardless of where the site sits in the hierarchy:

Spaces for outdoor sport including pitches - where relevant, particularly when demonstrating a proposal to reprovide facilities, applicants will have to demonstrate that alternative sites are equally available locally, review any relevant information within the Council's latest Playing Pitch Study, and liaise with Sports England and the City Council's Active Communities team where necessary. Consideration should be given to the types of sports that the space provides for currently, whether this can be accommodated elsewhere, or whether alternative sports might better suit the local community.

Allotments and other spaces for food growing (e.g. community orchards) – where relevant, particularly where a proposal could reduce provision, applicants will have to demonstrate consideration of the current provision of allotments and other food growing opportunities in the local area, including review of up-to-date waiting lists, quality/quantity of plot provision and supporting facilities. Disposal of allotments requires application to the

Secretary of State and is only consented in exceptional circumstances.

Churchyards and cemeteries – where relevant, will have to demonstrate consideration of the historical context of many of these areas and their role as a setting for irreplaceable heritage assets and broader cultural/social significance.

Parks and gardens, accessible greenspace and amenity greenspaces – these spaces often play a role in supporting people to socialize, take part in informal recreation (particularly where facilities like children/youth play and outdoor gym equipment are present), and generally provide an escape from the urban environment. Where relevant, applicants will have to demonstrate consideration of how any loss can be mitigated, especially if this is located in an area which already suffers from a deficit of such spaces according to an up-to-date green infrastructure/open space study.

Draft Policy G1 is the identified preferred approach from the various options relating to this issue considered in option set 005a of Background Paper 005.

DRAFT POLICY G1 – PROTECTION OF GREEN INFRASTRUCTURE

Green and Blue Infrastructure Network
The City Council will seek to protect the GI network for the many and varied benefits it offers. The hierarchy of GI spaces and the policy approach for each level of the hierarchy is as follows:

G1A: Core Green and Blue spaces
Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as Core Oxford Green and Blue spaces and the important green network function they provide. These spaces are designated G1A on the policies map.

G1B: Supporting Green and Blue spaces
Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/loss is mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher. These spaces are designated G1B on the policies map.

G1C: All other Green and Blue spaces
Planning permission will only be granted for proposals which affect all other Green and Blue spaces where any impacts are mitigated by ensuring sufficient reprovision, ideally onsite, and to the same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements.

Residential Garden Land
Planning permission will be granted for new dwellings on residential garden land provided that:

a) the proposal responds to the character and appearance of the area, taking into account the views from streets, footpaths and the wider residential and public

environment; and

b) the plot to be developed is of an appropriate size and shape to accommodate the proposal, taking into account the scale, layout and spacing of existing and surrounding buildings, and the minimum requirements for living conditions set out in Policies HD11, HD12 and HD13; and

c) requirements are met for biodiversity as set out in Policy G4, greening factor as set out in Policy G3 as well as requirements for protection of existing green infrastructure features, as set out below.

Existing green infrastructure features

Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees and important hedgerows except in wholly exceptional circumstances or there is a suitable compensation strategy in place (as per Government Guidance).

d) Planning permission will not be granted for development resulting in the loss or deterioration of other trees, except in the following circumstances:

   i. it can be demonstrated that preservation of the trees is not feasible which should include:
   ii. evidence of testing of practical alternative site layouts that might preserve the tree(s) where possible; and
   iii. Evidence that loss or other impacts to any tree(s) on the site has been minimised where possible, and guided by BS.5837:2012 recommendations or its future equivalent;

e) where tree retention is not feasible, any loss of tree canopy cover should be compensated by the planting of new trees to provide additional tree cover (with consideration to the predicted future tree canopy on the site at 30 years following development) to achieve a minimum of no net-loss of tree canopy cover; and

f) where loss of trees cannot be compensated by tree planting, then alternative forms of green infrastructure should be incorporated that will mitigate the loss of trees, using the Urban Greening Factor to demonstrate no reduction in GI score as a minimum (as well as meeting any other requirements as set out in Policy G3).

Planning permission will not be granted for development that results in the loss of other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest. If it is demonstrated that their retention is not feasible, then their loss must be mitigated in accordance with other relevant policies, in particular Policy G3.

ENHANCEMENT AND PROVISION OF NEW GREEN AND BLUE FEATURES

4.7 Ensuring the provision of green and blue infrastructure features on new development that provides multi-functional benefits for health and wellbeing of people and wider environment should be fundamental to the design process. This might include providing enhancements to the existing green/blue features on a site,

as well as providing entirely new features and spaces, including potentially new public rights of way.

Key considerations for the policy:

4.8 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Many development sites in the city are constrained and opportunities to provide extensive green infrastructure can be limited.

- New development bringing additional people into an area can increase pressure on existing spaces.

- Public open space needs to be of a certain size to be useable, although green spaces can be valuable even if they are not public open space.

- It is important that the ongoing maintenance and management of green features is considered when it is designed into a scheme. For example, new trees require ongoing watering and care for the first few years after planting as well as periodic pruning and surveying throughout the rest of their life.

- Choice of green features should be guided by the context of the site but could include trees, hedges and pollinator friendly planting as well as blue features like ponds and rain gardens.

- By ensuring that the choice of species, their location and arrangement within the site and ongoing management is tailored towards maximising benefits from the beginning, applicants can ensure the most successful and long-lasting design outcomes for the lifetime of the development.

- On larger sites, there may be opportunities to incorporate tree-lined streets and multi-purpose green drainage features (SuDS) that can provide space for play and recreation, protection from heat, and also act as flood storage at times of heavy rainfall.

How the draft policy responds to these considerations:

- Because of the constrained nature of many of sites, it is important that, where opportunities are available to incorporate greening, the greening is designed to a high-quality. The draft policy seeks to guide applicants towards designing green infrastructure in a way that will, ideally, be able to secure multiple beneficial functions e.g. providing for biodiversity whilst also

offering space to play/socialise (though this may not always be appropriate for certain uses). Potential benefits are set out in a list.

- Recognising the valuable role blue corridors play in connecting up spaces across the city and providing for a range of benefits, including for nature, the draft policy includes requirements for ecological buffer zones along watercourses. It recognises that development nearby may also bring about opportunities to re-naturalise the embankments along these watercourses also.

- Larger developments will be expected to include on-site public open space such as small parks which should have a mix of uses tailored to the needs of occupants and the local area, for example, a nature area, seating, a playground and kick-about area, or areas left aside for community food growing. This provision can be important for reducing pressures on existing green spaces in the local area when new development brings in more residents.

- In exceptional circumstances, where on-site provision is not achievable, opportunities should be sought for enhancing existing public open space in the vicinity of the development to help accommodate any additional pressures arising in liaison with the Council, such as by providing additional recreational facilities on a site where existing provision is lacking. Developer contributions and/or legal agreement may be sought to deliver such outcomes where these are identified as important for the sustainable delivery of a scheme.

- The draft policy sets out requirements for applicants to consider the maintenance and management arrangements of new green features and, where appropriate, to ensure new features are successful in the long term.

- Whilst this draft policy would set out general requirements for new green infrastructure, applicants may have to consider other more site-specific requirements for greening that may be outlined in specific site allocations, as well as what is needed as part of the Urban Greening Factor (Policy G3).

Draft Policy G2 is the identified preferred approach from the various options relating to this issue considered in option set 005b of Background Paper 005.

DRAFT POLICY G2: ENHANCEMENT AND PROVISION OF NEW GREEN AND BLUE FEATURES

Planning permission will be granted for proposals that include a variety of green infrastructure features as a fundamental component in the design of new development. Where the site includes existing GI features, proposals should seek to enhance these, prioritising

opportunities to improve linkages between features in order to strengthen connections with the wider green infrastructure network including beyond the boundaries of the site. Features should be highlighted clearly within the Design and Access Statement where required and/or on landscape/elevation plans, which should also include details of how the following requirements have been met where relevant.

In demonstrating that green infrastructure considerations have played a fundamental part of the design process, the selection of green/blue features, or enhancement of any existing features, should be tailored to the specific context of the site and surrounding area. The proposal should set out clearly how GI has been designed to secure multi-functional benefits which contribute to the following, where relevant:

a) Public access;
b) Health and wellbeing, including facilitating recreation and play for people of all age groups and abilities;
c) Making space for nature and enhancing biodiversity;
d) Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with surrounding green infrastructure (e.g. by including lines of trees/hedges to support linkages);
e) Addressing climate change (including carbon sequestration; reducing flood risk; providing sustainable drainage; reducing overheating and promoting urban cooling);
f) Enhancing appearance and character/sense of place;
g) Conserving and, where possible, enhancing the historic environment;
h) Connectivity of walking and cycling routes;
i) Opportunities for edible planting or community food growing;
j) Providing natural buffer features to mitigate impacts of air pollution or noise.

Opportunities to enhance blue corridors
For proposals on sites incorporating or located adjacent to watercourses, opportunities should be sought through careful design and landscaping to re-naturalise the water courses where possible, including restoration of the bankside and instream habitats and leaving an ecological buffer zone of at least 10 metres width. In some cases, this may require reinstatement of the buffer zone on previously developed land.

New public open space
In situations where the proposal relates to replacement provision that is mitigating losses elsewhere, this will need to be demonstrated to be equally or more accessible for people of all ages and abilities by walking, cycling and public transport to local users of the existing site where relevant.

For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required. For mixed-use sites, the area of residential use should be used for that calculation.

Where new open space is provided, the type of provision should be tailored to address existing needs or deficiencies in access locally. For example, by providing space for food growing where residents might not have access to allotments in the local area or incorporating play features for younger people.

Maintenance/management arrangements
Appropriate maintenance/management plans should be organised as part of the

design/construction process. Applicants will be required to replace any failed features for the first five years post-completion, unless agreed otherwise with the Council, and this will be secured through planning condition. Where appropriate, applicants will be expected to enter into a legal agreement to ensure that any new public space is properly maintained, by means of a financial contribution to the City Council.

PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN GREENING FACTOR

4.9 Natural, green surface cover can promote multiple benefits, from providing space for biodiversity and mental/physical health benefits for people, as well as promoting climate resilience through slowing and storing rainwater during intense downpours and promoting cooling during high heat events. The potential for these benefits is lost if there is an overuse of artificial, impermeable surfacing materials like concrete, artificial lawns and tarmac. For these reasons, the use of a policy tool called an Urban Greening Factor (UGF) is proposed as part of the Local Plan 2042, which seeks to quantify and drive onsite urban greening on new development, with particular attention on the naturalness of surface cover.

Key considerations for the policy:

4.10 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- The UGF is one of the five headline standards that are the key component of Natural England's GI framework. These standards define for planners, developers and communities what good green infrastructure 'looks like' and how to deliver them effectively.

- The UGF has been developed to assign weighted scores to different types of surface cover provided on a site based upon the variety of environmental benefits that they provide.

- The assessment process requires applicants to assess and quantify green infrastructure on their site prior to developing the area to establish a baseline for the site. This process is then repeated to assess the green infrastructure coverage which is proposed in the design of the new development to be provided post-development.

- Whilst Natural England recommend targets to be used as part of a UGF requirement, these have not been subject to local considerations. For Oxford, the target score needs to be set to be achievable but high enough to achieve Local Plan aims around greening and driving climate resilience.

- The UGF tool is not intended to be used in place of other policy requirements, such as submission of the Department for Environment, Food and Rural Affairs (DEFRA) biodiversity metric to demonstrate biodiversity net gain, or the need for landscaping plans. However, these considerations complement each other and there will be natural crossover between them. Features that help to meet the UGF requirement are also likely to add to biodiversity and help create Biodiversity Net Gain and also meet requirements of Policy G4.

How the draft policy responds to these considerations:

- This policy sets out the minimum conditions for urban greening that major development will need to meet in Oxford, which are that there is no net loss in the baseline score of the sites through the development process and ensuring that all new development meets a minimum score.

- The minimum score would help to ensure that all applicable developments provide for an achievable level of improvement where the sites do not currently exceed this score. In addition, the requirement that there is no loss of baseline also ensures that development does not worsen the overall provision of greening on a site. This would potentially necessitate the improvement of some parts of a site through providing higher quality green features in order to offset the losses of features (e.g. to development) elsewhere on the site.

- The proposed targets in the policy have been informed by previous desk-based testing of the tool on a number of sites in the city to understand what is achievable. Whilst they are slightly lower than Natural England's recommendations, they are considered to be realistic and achievable based on the local context of the city. They could be reviewed as part of future Local Plans, depending on the performance of the policy in practice.

- Whilst the use of the UGF assessment is only required of major development through the policy, other types of development are encouraged to use the tool to calculate change in green surface cover in support of their application where possible.

Draft Policy G3 is the identified preferred approach from the various options relating to this issue considered in option set 005c of Background Paper 005.

DRAFT POLICY G3: PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN GREENING FACTOR
An appropriate proportion of natural green surface cover – which may be comprised of both existing and newly installed features – will need to be demonstrated on certain proposals (as set out below) and evidenced via submission of a completed Urban Greening Factor (UGF)

assessment.

Applicants are expected to assess and submit the baseline score for the site pre-development, prior to any site clearance, as well as the proposal as built/post-development. The as built/post-development score required for development proposals will need to meet the following policy criteria:

Major development: proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of:

- 0.3 for residential or predominantly residential schemes
- 0.2 for predominantly non-residential schemes

All other forms of development (such as minor development) are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF tool, though this is not mandatory.

Along with the submitted UGF assessment, all greening features proposed for the development and used in the calculation of the UGF score should be clearly demonstrated on associated landscaping/elevation plans in the application.

The adopted calculation formulae and the factors for various surface cover types are outlined in Appendix 4.1.

BIODIVERSITY AND THE ECOLOGICAL NETWORK

4.11 Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, including lowland hay meadows, calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. Their ongoing protection is important as many species and habitats across the country continue to experience significant losses due to a range of pressures including from changing land use, pollution and climate change. Alongside the broader approach to protecting and providing green infrastructure, it is important we incorporate policies into the Local Plan that not only conserve those spaces that are particularly valuable for our wildlife and flora but also deliver new provision for nature at a variety of scales supporting nature recovery - from smaller features in new development to wider habitat creation in line with the objectives of the Environment Act 2021.

DELIVERING MANDATORY NET GAINS IN BIODIVERSITY

4.12 Under the Environment Act 2021 all new planning applications must deliver biodiversity net gain of 10%. There are certain exemptions, including householder

applications, to which this requirement does not apply. The 10% target should be considered as the minimum and applicants are encouraged to explore options for delivery of net gain that exceeds this 10% wherever possible.

Key considerations for the policy:

4.13 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- National legislation sets out high-level requirements for how 10% biodiversity net gain should be delivered, including that applicants must demonstrate it via completion of the DEFRA Biodiversity Metric tool.

- Whilst many sites in the city are constrained and may be limited in opportunities to deliver onsite net gains, trying to deliver biodiversity net gain as part of the development can be particularly beneficial for helping to ensure spaces for nature are brought closer to the places people live and work, securing the benefits for mental health they can provide as well as creating habitat for wildlife throughout the city.

- The Oxfordshire draft Nature Recovery Network (NRN), was prepared in advance of the Local Nature Recovery Strategy (LNRS) for Oxfordshire, and identifies areas of land within the city that are most beneficial for supporting the wider ecological network. The LNRS is being prepared by Oxfordshire County Council and is expected to be finalised later in 2025.

- The LNRS and NRN both seek to identify the areas of opportunity where biodiversity enhancement would be most beneficial in the city and wider county and help to provide a clear direction towards where off-site contributions would be most well-suited.

How the draft policy responds to these considerations:

- The draft policy expects use of the latest version of the Biodiversity Metric to demonstrate that the 10% net gain requirement will be met. The metric rules and principles set out by Natural England in the relevant User Guide must be adhered to, ensuring that all habitat categorisations and condition assessments are justified, with reference to the UK Habitat Classification System and the latest Biodiversity Metric Technical Supplement.

- Alongside submission of the completed Biodiversity Metric, baseline and proposed habitat plans must also be submitted.

- The draft policy would set out clear local expectations in the form of a hierarchy for delivering net gain, with onsite being the clear preference before other options are considered.

- Where onsite provision is not feasible, the proposed hierarchy would then steer offsite net gains towards the Local Nature Recovery Strategy (LNRS) identified areas within the city, before other sites are explored in the city and then the wider county.

- Because the LNRS is still an emerging document, the policy also references the existing mapping relating to the Oxfordshire Nature Recovery Network or Conservation Target Areas in the meantime, which could be targeted before the LNRS is finalised.

- It allows consideration of purchase of biodiversity units from a habitat bank or statutory biodiversity credits, as a last resort when neither on nor off-site net gain is possible and when it can be robustly justified.

Draft Policy G4 is the identified preferred approach from the various options relating to this issue considered in option set 005d of Background Paper 005.

DRAFT POLICY G4: DELIVERING MANDATORY NET GAINS IN BIODIVERSITY

Planning permission will only be granted for development where it delivers a minimum of 10% biodiversity net gain, as measured by the latest version of the DEFRA Biodiversity Metric, unless exempted by national legislation or guidance. This must be achieved in all sections of the Biodiversity Metric relevant to that development (e.g. habitat, hedgerow, and river units). Delivery that exceeds 10% net gain is strongly encouraged wherever possible.

A copy of the completed metric spreadsheet must be submitted in support of planning applications. All metrics must be completed in line with the requirements set out in the relevant DEFRA User Guide, Technical Supplement, and best practice principles.

Applications are expected to prioritise the delivery of net gain onsite.

Where this is not feasible, delivery of off-site biodiversity enhancements will be expected to accord with the following hierarchy of preference:

1. Land in Oxford identified for its ecological potential within the Local Nature Recovery Strategy (or within the Oxfordshire Nature Recovery Network, or Conservation Target Areas, until the Local Nature Recovery Strategy is published).
2. Elsewhere within the Oxford boundary
3. Elsewhere within the Local Nature Recovery Strategy areas in wider Oxfordshire (or within the Oxfordshire Nature Recovery Network, or Conservation Target Areas, until the Local Nature Recovery Strategy is published).

Where offsite measures are proposed, these should focus on delivering high-quality priority habitats. Any offsetting proposed in alternative locations will be considered on a case-by-case basis.

Where it is robustly justified that the above cannot be achieved, purchase of biodiversity units from habitat banks elsewhere or statutory credits may be accepted as a last resort.

All onsite and offsite measures must be delivered through a biodiversity management and monitoring plan which must cover a period of at least 30 years in line with the national legislation requirements.

ENHANCING ONSITE BIODIVERSITY IN OXFORD

4.14 The biodiversity net gain requirements required as part of the Environment Act, which are addressed in draft Policy G4, focus specifically on habitat creation. This is one important way of supporting our wildlife; however, there are additional ways in which design can support biodiversity in the city, including targeted support for wildlife, including priority species, by providing resources such as food and shelter within the urban environment. These extra measures are particularly important where the 10% biodiversity net gain requirement cannot be delivered onsite.

Key considerations for the policy:

4.15 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Oxford and the surrounding area hosts a number of rare or nationally valuable species which are recognised nationally as 'priority species' including Hedgehogs, Water voles, Dormice, Swifts and Slow worms.

- The Environment Act's 10% habitat net gain requirement will not necessarily mean that support for wildlife, including our priority species, is provided within new developments, as developers do have to option to provide this offsite. Also, this net gain is focussed on habitat creation and there are other types of provision that can be important for helping species to navigate and survive in our urban environment.

- These features, such as bird/bat boxes, pollinator friendly planting, or design features that enable species to move between spaces and throughout the city, can be very simple to incorporate, even where onsite 10% BNG may not be feasible. They have many benefits for species though they are not typically recognised by the DEFRA Biodiversity Metric calculations.

- Such features will have the greatest benefit where they are tailored to specific opportunities for supporting local species in the area, particularly

priority species. For example, there are particular areas that are frequented by bat species so would be better suited to accommodating features that can help them, whereas development close to waterbodies may be particularly fitting for types of features that support wetland species.

- Larger scales of development are likely to have more opportunities to host a greater selection of features than smaller scales of development.

How the draft policy responds to these considerations:

- The draft policy would set out that a minimum number of new ecological enhancements would be required on new developments separate to any onsite BNG delivered in accordance with the Environment Act.

- In order to meet the policy requirement, applicants would be able to select from a list of enhancements that have been identified in the Council's Ecological Points list as being particularly suitable to Oxford's setting. Potentially, this list could be maintained as a live list that could be added to in future where new opportunities for particular types of features are identified. There may also be opportunities to tailor the list of features so that they complement the types of enhancements that the Local Nature Recovery Strategy identifies as opportunities within the city. An example of the potential features that could be included in the policy is set out in Appendix 4.2.

- As shown in Figure 4.3, the potential features would be grouped into a mandatory pot (pot 1), which are particularly important and would be required of all new development (including householder applications), as well as a group of features that support shelter and movement (pot 2) and a group of wider supporting landscape features (pot 3).

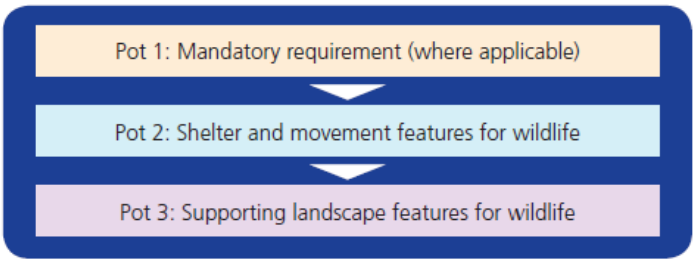
- After incorporating any mandatory features, the policy would be flexible as to which enhancements can be chosen to reach the minimum points total needed from pots 2 and 3 for minor and major development. This means that selection of particular features from the list can be tailored to the specific context of the site and surrounding area.

- The ecological enhancements chosen to meet the points requirement of the policy will need to be clearly evidenced on associated landscape and elevation plans and/or within the Design and Access statement. Applicants would also need to show that they have considered any maintenance/management requirements.

- The draft policy also includes some requirements around avoiding invasive species, and including a proportion of native planting species, which are particularly important for supporting local species. It does, however, make

an allowance for non-native species where these can be shown to have additional benefits.

Figure 4.3 - Three pots of features that would comprise the Council's proposed Ecological Points list



Draft Policy G5 is the identified preferred approach from the various options relating to this issue considered in option set 005e of Background Paper 005.

DRAFT POLICY G5: ENHANCING ONSITE BIODIVERSITY IN OXFORD

All extensions and new-build development should seek to incorporate ecological enhancements into landscaping or building facades/roof spaces which are tailored to the priority habitats and protected species present within the site and surrounding area. Opportunities to create, expand, enhance or link ecological networks are particularly encouraged.

All new development must deliver a minimum number of ecological enhancements selected from the Council's Ecological Points List to achieve the required point total. The number of points required is as follows:

- **Householder application** – all mandatory features from pot 1 (where applicable)
- **Minor development application** – all mandatory features from pot 1 (where applicable); PLUS 1 feature from pot 2; PLUS 1 feature from pot 3
- **Major development application** – all mandatory features from pot 1 (where applicable); PLUS 2 features from pot 2; PLUS 2 features from pot 3.

Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged. The chosen measure(s) will need to be clearly highlighted on landscape and elevation plans and/or within the design and access statement.

In addition, all new tree and soft landscaping must incorporate an element of native planting, and where non-native planting is proposed this should comprise species beneficial to UK pollinators and/or chosen to be well-adapted to future changes in climate. Proposals incorporating invasive plant species will be refused.

All maintenance and management requirements of the proposed enhancements must be specified within planning applications and secured via planning conditions.

PROTECTING OXFORD'S BIODIVERSITY INCLUDING THE ECOLOGICAL NETWORK

4.16 The draft Policy G1, as set out earlier in this chapter, is intended to protect a multi-functional network of green and blue space across the city, but additional, specific protections are proposed for ecological sites within the network based upon their importance and value for the species and/or habitat they have been designated for. The hierarchy of protection for this ecological network is set out in the following draft policy. The policy would also address requirements for assessing potential for any existing biodiversity on the site (including habitats and species) and mitigating impacts on these.

Key considerations for the policy:

4.17 The considerations which have informed the preferred approach so far are set out in Background Paper 005: Green infrastructure and Biodiversity. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Oxford includes a network of habitats and ecological sites, some of which are particularly rare or diverse, including areas of irreplaceable habitat, which is already protected strongly through national policy.

- There are a range of sites that have been designated for their importance at an international or national scale, such as the Oxford Meadows Special Area of Conservation (SAC), and the Sites of Special Scientific Interest (SSSIs), which also benefit from protections in national policy. As well as areas of county level or city level importance, including Local Wildlife Sites (LWSs), Oxford City Wildlife Sites (OCWSs) and Local Nature Reserves (LNRs), which need to be protected through local planning policy predominantly as they do not benefit from the same national policy protections as the SAC and SSSIs.

- The habitats that comprise the wider ecosystems within these sites are difficult to move without compromising the special characteristics and functions for which these sites have been designated. It is therefore important to protect them in situ and also ensure that new development coming forward nearby does to have adverse effects on these sites, either directly, such as through causing habitat loss, or indirectly through impacting the particular environmental conditions which support these sites (e.g. through pollution).

- A number of sites in the city are particularly reliant upon specific hydrological conditions, such as flows of surface or groundwater and the quality of that water which means that they are potentially vulnerable to changes in

hydrology that could arise from development. For example, Oxford Meadows SAC is potentially sensitive to changes in groundwater flows stemming from development on the North Oxford gravel terrace, equally, New Marston Meadows and Lye Valley SSSIs are sensitive to changes in flows and quantities of groundwater within their catchment areas.

- There are also undesignated sites that support habitats and species of principal importance (this is a wider selection of habitats and species listed under S41 of the Natural Environmental and Rural Communities Act, 2006, some of which are protected under other legislation and some not).

- As well as the underlying habitat that supports a range of flora and fauna, there are species that need particular protection, as well as habitats. The impacts of development can negatively harm Oxford's wildlife, or be designed in a way that can support it, and it is important for proposals to be appropriately informed of potential for impacts through relevant assessments and ecological expertise so that these can be avoided and/or mitigated.

How the draft policy responds to these considerations:

- The starting point for the draft policy is that proposals should seek to conserve and enhance biodiversity, whilst also seeking to ensure that all designated sites within the ecological network are be protected from development except in exceptional circumstances. This includes being developed upon, as well as being adversely affected by development nearby.

- The policy seeks to ensure that existing biodiversity and features of ecological interest are understood, and development proposals are accompanied by sufficient ecological survey information to enable this. Any impacts on existing features that survey work has identified would need to be satisfactorily addressed through the design of the development.

- In addressing impacts, the mitigation hierarchy would be expected to be followed. This requires that applicants seek to avoid any potential impacts in the first instance through careful design/construction choice before tailoring the proposal to mitigate impacts. Only once the first two steps (avoid and mitigate) in the hierarchy have been exhausted should compensation measures be considered.

- The draft policy then sets out protection for international/national sites, including that development would not be permitted where this results in adverse effects on them. The definition of adverse effect and what will need to be considered will depend upon the nature of the particular site, and the particular qualities for which it is designated, including the types of

habitat/species present and the impacts that they are vulnerable to. For example:

- New subterranean development on the Oxford gravel terrace may need to demonstrate through a hydrogeological assessment that there will be no significant adverse effect upon the integrity of the SAC through changes to groundwater flows.

- Development in proximity to the Lye Valley may need to show how harmful impacts on water quality, or changes in groundwater flows or recharge have been avoided/mitigated if there is a possibility that the proposal could have an adverse effect in this way.

- At the end of the draft policy, some considerations for determining whether adverse effects may be generated are set out, and it is expected that these would be expanded upon in supporting text to the policy as well as other supporting guidance to the Local Plan e.g. Technical Advice Notes (TANs).

- Reflecting the particular importance of the SAC and SSSIs, new development immediately adjacent to these sites will also be expected to incorporate appropriate buffers that protect these sensitive areas during the construction and operational phases and ultimately deliver additional supporting habitat. The design of these buffers will need to be guided by the ecological context of the sites they are being designed to protect, as well as appropriate ecological advice.

- The draft policy also then sets out protections for locally designated sites, which do not otherwise benefit from any protection via national policy. Whilst the draft policy G1 protects these from development because they are also identified as core spaces within the GI network, the requirements in draft policy G6 primarily therefore relate to how development nearby which could have an adverse effect on these sites will need to address potential impacts before it would be permitted.

Draft Policy G6 is the identified preferred approach from the various options relating to this issue considered in option set 005f of Background Paper 005.

DRAFT POLICY G6: PROTECTING OXFORD'S BIODIVERSITY INCLUDING THE ECOLOGICAL NETWORK

Development proposals must seek to conserve and enhance biodiversity including safeguarding the key sites of Oxford's ecological network.

Proposals with a reasonable likelihood of adversely impacting semi-natural habitats or protected species on or immediately adjacent to the site, will only be permitted where:

a) They have been informed by targeted ecological surveys, completed prior to determination of the planning application, unless explicitly agreed with the Council;

and

b) Any impacts identified have been satisfactorily addressed in the design of the development in accordance with the mitigation hierarchy; and
c) Any impacts on species or habitats that are of city or county importance, in line with the criteria for LWS or OCWS designation, have been addressed in accordance with requirements for proposals affecting locally designated sites (criteria d and e below).

Internationally and nationally designated sites
Development will not be permitted that would have an adverse effect on the integrity of the Oxford Meadows Special Area of Conservation (SAC) or an adverse effect on any Site of Special Scientific Interest (SSSI).

In addition, development will not be permitted within the SAC or a SSSI except where it is related to and required for the management, maintenance or enhancement of the qualifying features of the site.

Development proposed on land immediately adjacent to the SAC or any SSSI must be designed with a buffer to that site that both helps to prevent adverse effects during the construction and operational phases of the development and delivers habitat supporting the interest features of that site.

Within the groundwater catchment areas for the Oxford Meadows SAC, Lye Valley and New Marston Meadows SSSI's, development which could have negative hydrological impacts in relation to surface and groundwater will need to demonstrate that these have been avoided, or mitigated where relevant, through use of appropriate measures such as infiltration methods (where geological conditions allow) and careful design of below ground works.

Locally designated sites
Development that would have an adverse effect on a Local Nature Reserve (LNR), Local Wildlife Site (LWS) or Oxford City Wildlife Site (OCWS) will only be permitted where:

d) There is an exceptional need for the new development that outweighs any adverse effect from loss of habitat or harm to any feature of interest for which the site was selected, and this need cannot be met by development on an alternative site with less biodiversity interest; and
e) Satisfactory mitigation and compensation onsite or sufficiently local to preserve the feature of interest can be delivered and has been agreed with the Council.

The same level of protection will be afforded to proposed LWS and proposed OCWS (prior to the conclusion of the selection process).

Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest features for which the site was selected.

Other features of interest
Development should seek to retain and enhance habitats and species of principal importance for biodiversity wherever possible.

Determining adverse effects
In determining the potential for adverse effects on ecology from a development, including where this relates to designated sites, applicants will need to demonstrate that they have considered information from various sources where relevant, including the site context and surrounding

area; expert ecological advice, applicable Council Technical Advice Notes, as well as a review of relevant existing information where available, such as Natural England's Impact Risk Zones (IRZs). A range of potential impacts will need to be considered and will depend on the context of the application and proximity to any protected site(s), particularly, but not limited to:

- Loss of protected land;
- Recreational impacts;
- Impacts on air quality;
- Impacts on water quality;
- Impacts from artificial lighting;
- Changes to the hydrological regime (particularly surface and groundwater).

FLOOD RISK AND CLIMATE RESILIENT DESIGN

4.18 Climate change is the greatest threat facing society today and the way we design and construct the built environment has a key role to play, not only in how we mitigate our impacts on the climate (as is dealt with in Chapter 5), but also in how we can adapt to and withstand the impacts of a changing climate in future. A certain amount of climate change is already effectively 'baked into' our future, even if the world were to stop emitting greenhouse gases tomorrow, due to the long-term effects of emissions like carbon dioxide already within the atmosphere. Adaptable and resilient design in new development that can enable it to better withstand the impacts of climate change and reduce the harmful effects for occupants and other users will therefore be essential. This last section of the chapter sets out the draft policies for addressing flood risk and surface water drainage as well as ensuring design of new development is resilient to climate change.

FLOOD RISK AND FLOOD RISK ASSESSMENTS (FRAS)

4.19 Oxford's risk from future climate change is primarily related to the hazards of flooding and hotter, drier summers. The city has a complex geography with potential for flooding from various sources like rivers, surface waters and the sewers, with potential impacts for people's health as well as economic costs through damage to properties and businesses. It is therefore imperative that policies set out the approach development needs to take in addressing flood risk now and in the future with the added effects of the changing climate.

Key considerations for the policy:

4.20 The considerations which have informed the preferred approach so far are set out in Background Paper 007: Flood risk, SuDS and drainage. In summary, the key

considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- National policy on planning for and mitigating flood risk is already very strong, but there is a need to consider this in the local context

- The context of Oxford in terms of flood risk is complex. Although the city is very constrained, there is a high development need, and much of the new development comes forward on previously developed land, there is also (in some parts of the city) a high level of flood risk

- A significant amount of the city lies within areas of higher flood risk according to EA mapping (updated March 2025) and the Council's latest Strategic Flood Risk Assessment (2023).

- Climate change is projected to bring about wetter winters, and more intense rainfall events that could exacerbate flood risk from various sources like rivers, surface water and the sewers

- The Oxford Flood Alleviation Scheme (OFAS) is a partnership project led by the Environment Agency which will reduce flood risk from the River Thames to existing businesses, residential properties, major roads and the railway development particularly at risk from flooding in the Botley and Abingdon Roads area. However, the OFAS is only one response for addressing flood risk in city and will not remove risk entirely, thus it is imperative that new development proposals consider flood risk from all sources and respond to particular circumstances of the local area accordingly.

How the draft policy responds to these considerations:

- Sets out where site-specific Flood Risk Assessments (FRAs) will be required for development and what should be considered including accounting for the impacts of climate change over the expected lifetime of the development.

- Guides developers to take a methodical approach to addressing flood risk and emphasises hierarchy of need to assess, avoid, mitigate and then manage any remaining risk through design of the scheme if it cannot be avoided.

- Responds to the fact Oxford is constrained, has lots of development already in the flood plain and pressures for new development, by agreeing a bespoke approach to Flood Zone 3b, whilst ensuring that the flood risk vulnerability classification will not be increased on any site.

- Aware that the OFAS project is still being worked up and is not yet ready for delivery so should be dealt with in the supporting text rather than policy.

- Includes an approach to dealing with minor extensions (including householders) proposed within Flood Zone 2 and 3a. National policy is silent on this, but extensions are a common form of development occurring regularly around the city. The frequency of occurrence does have the potential for cumulative impacts resulting in increased flood risk as flood storage areas are lost to development of this type of development. A pragmatic approach to ensure minimisation of risk to occupants and the surrounding area is set out in the draft policy.

- Not allowing proposals for basement accommodation in Flood Zones 2 or 3 due to the unacceptable additional risks associated with this type of accommodation.

- Not permitting applications that propose to culvert open watercourses as this can increase flood risk and lead to a loss of natural flood management features.

- Changes of use to a house in multiple occupation (HMO) in Flood Zones 2 and 3 will require a FRA to be carried out to assess the risk on and off site. This is because there is a higher risk when managing the safe access and egress of individuals that live separately (which is more typical of those that live in HMO accommodation) should flooding occur.

Draft Policy G7 is the identified preferred approach from the various options relating to this issue considered in option set 007a of Background Paper 007.

DRAFT POLICY G7: FLOOD RISK AND FLOOD RISK ASSESSMENTS (FRAS)

Planning permission will only be granted where proposals have considered the potential for flooding from all sources including the impacts of climate change for the expected lifetime of the development, as well as the potential for them increasing flood risk elsewhere, the safety of users of the development, and where they have appropriately addressed any flood risks identified.

Planning permission will only be granted where a sequential approach has been taken to locating the development and where the Sequential Test and the Exception Test (where necessary according to national policy and supporting guidance) have been passed.

Planning applications for development (including minor householder extensions and changes of use to houses in multiple occupation (HMO)) must be accompanied by a Site-Specific Flood Risk Assessment (FRA) when proposed in the following locations:

- within Flood Zone 2,
- within Flood Zone 3,
- on sites within Flood Zone 1 larger than 1 ha,
- on sites within Flood Zone 1 of less than 1 ha but including a change of use in development type to a more vulnerable class,
- on sites within Flood Zone 1 in areas at risk of flooding from other sources such as

surface water and ground water flooding.

The FRA must be undertaken in accordance with up-to-date flood data, national and local guidance on flooding and consider flooding from all sources including the impacts of climate change now and in the future.

Planning permission will only be granted where the FRA demonstrates that for the lifetime of the development and including the impacts of climate change:

a) the proposed development will not increase flood risk offsite; and
b) future occupants will be safe during times of flood; and
c) safe access and egress in the event of a flood can be provided; and
d) details of the necessary mitigation measures to be implemented have been provided; and
e) where the proposed development will not impact on delivery of future flood relief measures.

For minor extensions (including householder) proposed within Flood Zone 2 and 3a, it is acknowledged it may be challenging to meet all the requirements above. Proposals will be expected to minimise risk to occupants and surrounding area by following the below hierarchy of principles in order of preference, demonstrating robust justification where the top levels in the hierarchy cannot be met:

f) Full requirements of an FRA (as above)
g) Finished floor levels above design flood level with compensation
h) Finished floor levels above design flood level
i) Finished floor levels at existing level with water exclusion up to at least 300mm above the design flood level
j) Finished floor levels at existing level with a water resilient strategy up to at least 300mm above the design flood level (unless the development cannot be made safe).

Planning permission will not be granted for development in Flood zone 3b (including minor household development) except where it is for water-compatible uses or essential infrastructure; or where it is on previously developed land and includes a high standard of mitigation designed to demonstrably decrease flood risk compared with the current situation. All the following criteria must also be met:

k) it will not lead to a net increase in the built footprint of the existing building within Flood Zone 3b and where possible lead to a decrease; and
l) it will not lead to a reduction in flood storage (using flood compensation measures) and where possible increase flood storage; and
m) it will not lead to an increased risk of flooding elsewhere; and
n) it will not put the development or any future occupants at risk, including in relation to ensuring safe access/egress; and
o) it will not result in an increase in flood risk vulnerability classification or an increase in the number of dwellings.

Proposals for basement accommodation within flood zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation. Where proposals for basements are at risk of other sources of flooding (i.e. groundwater, surface water, or sewer flooding), it must be demonstrated that flood risk can be managed safely.

Applications that propose culverting of open watercourses will not be permitted.

SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

4.21 Sustainable Drainage Systems (SuDS) are features which are designed to manage the flow of rainwater in a way that mimics the natural landscape. They are increasingly important in the context of climate change, building the resilience of our urban areas to flooding during times of intense and heavy rainfall events but they can provide additional benefits, particularly where these are implemented through green features. SuDS need to be incorporated into the development from the earliest stages of design conception and may include water conservation (e.g. rainwater collection and storage) as well as surface water drainage (e.g. soakaways, porous surfaces, swales, streams and balancing ponds).

Key considerations for the policy:

4.22 The considerations which have informed the preferred approach so far are set out in Background Paper 007: Flood risk, SuDS and drainage. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- The Planning Practice Guidance (PPG) contains information about SuDS, but it is limited in terms of addressing ‘good design’ and regarding wider objectives. Additionally, it only addresses SuDS on major schemes.

- Prioritising natural, green and blue SuDS features including soft landscaping, green roofs and ponds rather than unnatural artificial components such as pipe systems or underground attenuation tanks.

- Recognising that SuDS can provide a multitude of benefits including providing open space for recreation, habitats to support wildlife and wider biodiversity and adaptation to other climate hazards such as overheating, as well as managing surface water.

- Appropriate SuDS features will also need to consider the context of the site and any previous site uses. Where a site has a history of contamination for example, then infiltration methods may not be suitable unless it can be demonstrated that there will be no pathway of contamination and alternative SuDS features will need to be utilised instead.

- Maintenance of SuDS as they have a tendency to become obstructed, reducing their effectiveness.

How the draft policy responds to these considerations:

- All development proposals (and not just major schemes) will be required to, where feasible, manage surface water through SuDS.

- Encouraging design of SuDS to maximise multi-functionality

- Setting out that SuDS are to be designed in a way that incorporates reuse, infiltration, retention or conveyance methods which utilise natural, green and blue infrastructure rather than unnatural, artificial components, unless exceptional site conditions justify that an alternative approach is required.

- Where a site has potential for contamination, SuDS that rely on infiltration will be discouraged and other suitable methods should be adopted to protect the water environment.

- Setting a drainage hierarchy for how surface water runoff should be managed.

- Requiring a SuDS maintenance plan to be submitted alongside any planning application for minor or major development, demonstrating how SuDS will be managed and remain effective for the lifetime of the development.

Draft Policy G8 is the identified preferred approach from the various options relating to this issue considered in option set 007b of Background Paper 007.

DRAFT POLICY G8: SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

All development proposals will be required where feasible to manage surface water through Sustainable Drainage Systems (SuDS).

SuDS must be designed in a way that incorporates reuse, infiltration, retention or conveyance methods which utilise natural, green and blue infrastructure rather than unnatural, artificial components. Below ground features such as pipe systems or underground attenuation tanks will not be permitted, unless exceptional site conditions justify an alternative approach which has been agreed with the Council. Multi-functionality of SuDS should be maximised in their design, such as where they are incorporated into public open space.

Where a site has potential for contamination, SuDS that rely on infiltration will be discouraged and other suitable methods should be adopted to protect the water environment unless it can be demonstrated that there will be no pathway of contamination. Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable.

Surface water runoff should be managed to greenfield run-off rates 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 (only in exceptional circumstances).

Details of the SuDS must be submitted as part of a drainage strategy or FRA where required.

A SuDS maintenance plan must be submitted alongside any planning application for minor or major development, demonstrating how SuDS will be managed and remain effective for the lifetime of the development. The plan must clearly explain what maintenance measures will take place, how frequently they will occur and for how long and will be secured by condition.

For major developments, Oxfordshire County Council (as Lead Local Flood Authority) are a statutory consultee, and as such proposals will be expected to be adhere to their SuDS standards.

RESILIENT DESIGN AND CONSTRUCTION

4.23 All new development needs to be designed in a way that can function efficiently and preserves the wellbeing of occupants in the context of current and future climate. This means applicants should have a good understanding of future climate risks (which extend beyond flood risk to encapsulate issues such as overheating, water stress and increased storminess) and incorporate a range of adaptation measures into their development that enable it to be resilient for its lifetime.

Key considerations for the policy:

4.24 The considerations which have informed the preferred approach so far are set out in Background Paper 008: Carbon reduction and climate resilient design. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Oxford is already at risk from hazards such as flooding, water stress and overheating, as has been documented in Oxfordshire County Council's Climate Risk and Vulnerability Assessment 2024. Indeed, Oxford has some of the most at risk areas in the county to overheating and flooding at present due to a variety of factors. These risks are expected to increase in future as climate continues to change.

- New development being built today is likely to be around for many decades, thus it is important that design is tailored for climate today as well as climate that is expected in future, considering both the risks to buildings, structures and supporting infrastructure, but also the risks to their occupants. Equally, it is important to avoid 'maladaptation', whereby inefficient design results in inappropriate development for future climate and the increased risks for occupants that come with it.

- There are a variety of Local Plan policies that are likely to be mutually supporting of climate resilient design, for example greening of development, or approaches to avoiding flood risk as part of design of sites. However, these policy areas are often seeking to achieve multiple objectives and delivering climate resilience may not always be the first priority, which means opportunities to deliver on this objective may not be maximised, or design choices could unintentionally go against achieving it.

- There is likely to be some overlap with Part O of the Building Regulations which is a separate consenting process to planning permission and where this is not considered in design processes conflicts can arise. For example, to address potential overheating, the Building Regs already require some consideration of factors that influence thermal performance such as the design and layout of windows. Changing window sizes and layout for other design reasons without considering impacts on overheating risk can impede ability to meet the Part O standard. Thus, considering issues at design stage and as part of the planning process reduces the likelihood of building control issues later.

How the draft policy responds to these considerations:

- The draft policy has two elements which should be demonstrated with detail that is proportionate to the scale of the development. The first element seeks to ensure that applicants to demonstrate how their design process has afforded appropriate consideration to existing and future climate and potential weather extremes that the proposed development will have to function within.

- Some applications will need to consider more risks than others, for example, those on sites in proximity to sources of flooding now or in future will have to consider issues in relation to these hazards whilst applications on sites in other parts of the city may not.

- The second element of the draft policy incorporates a checklist setting out the key measures which need to be addressed in the design of the development where relevant. Meeting these requirements will help demonstrate the proposal is designed for resilience to the spectrum of climate impacts.

- The parts of the checklist that will apply to each development will differ depending on the site and the types of risks it is exposed to and they will need to be informed by the information that has been referred to as part of the first element of the policy. There will be a variety of design solutions for a site that can deliver upon multiple requirements in the checklist (e.g. green infrastructure can promote urban cooling as well as flood resilience).

Applicants would be encouraged to incorporate design measures that have multi-functional benefits wherever possible.

- It is acknowledged that there may be overlap with requirements in other proposed policy areas and applicants may be able to refer to other parts of their application to evidence how they have addressed certain elements of the checklist, e.g. Flood Risk Assessments for flood resistance/resilience measures. However, to ensure compliance with this policy, the proposal will need to explicitly identify how the measure adapts or builds resilience to the existing and future climate change risks.

- The preferred approach would be for the applicants' Design and Access Statements to clearly set out how the requirements within the checklist have been addressed (or identify where these are not relevant), but where this is not required, the proposal should clearly set out in one place how the requirements have been met in another part of the application (e.g. planning statement).

Draft Policy G9 is the identified preferred approach from the various options relating to this issue considered in option set 008d of Background Paper 008.

DRAFT POLICY G9: RESILIENT DESIGN AND CONSTRUCTION

Planning permission will be granted where proposals have been designed with regard to most up-to-date climate change projections, suitably addressing the key risks from changing climate on occupants; the development; and any supporting infrastructure for its lifetime.

All proposals excluding householder applications, unless this is required as part of other policies in the Local Plan, will be expected to demonstrate (which could be as part of the Design and Access Statement) that the following resilience requirements are incorporated into the design:

a) Risk of overheating, flooding (from all relevant sources), and storm extremes have been considered for the lifetime of the proposed development and that design has been tailored to function effectively within future climate scenarios.
b) A cooling strategy to address risks of overheating which is proportionate to the scale of the building and promotes passive cooling, energy efficient measures in the first instance (in line with requirements of Policy R1). This should consider both internal and external environments.
c) The measures incorporated to manage water run-off and, where the site is at risk of flooding now or in future, measures to reduce flood risk, such as flood resistance measures (e.g. dry-proofing to keep water out) and resilience measures (e.g. wet-proofing to allow continued function during, or quick recovery after flooding).
d) The measures incorporated to ensure water is used prudently and that water is conserved, including that dwellings meet the water consumption limits in line with Policy R5 (Water Quality and Resources).
e) Supporting infrastructure is designed to function in extreme weather conditions.

CHAPTER FIVE

A CITY THAT UTILISES ITS RESOURCES WITH CARE, PROTECTS THE AIR, WATER AND SOIL AND AIMS FOR NET ZERO CARBON

INTRODUCTION

5.1 The draft policies of the previous chapter are intended to preserve and enhance green infrastructure and our natural environment, support nature recovery, and generally build the city's resilience to the changes in the climate that are already happening as a result of greenhouse gas (GHG) emissions (climate adaptation). Meanwhile, this chapter sets out the preferred approach for policies which seek to ensure new development comes forward in a way that does not further exacerbate climate change through additional carbon emissions – also known as climate change mitigation – whilst also supporting the existing built environment to move towards net zero carbon. The second part of the chapter also deals with protection of various natural resources and ensuring that the development process mitigates its impact on the wider environment.

AIMING FOR NET ZERO CARBON EMISSIONS

5.2 The first three draft policies for this chapter of the Local Plan address different elements of the strategy for helping to move the city towards its net zero carbon target of 2040, and the UK net zero carbon target as legislated in the Climate Change Act 2008 of 2050.

5.3 Key considerations driving this set of policies:

- Development occurring during the lifetime of this Local Plan will continue to be in use well beyond 2040 and 2050, it is crucial that it is brought forward in a way that is consistent with a net zero carbon future now – this reduces the need for future retro-fitting.

- In Oxford, the primary source of existing carbon emissions comes from the built environment, including buildings like homes and offices, as well as industrial and commercial uses. New buildings can add to the problem if not carefully designed. Retro-fitting will help tackle existing emission sources, and whilst many retro-fit measures can

take place without planning permission, the Local Plan needs to support projects where it can.

- Whilst this chapter focuses on buildings, development should also be designed in a way that supports users to live their daily lives in a sustainable way and reduce their carbon footprint in other aspects of life. There will be cross over with other areas in the Local Plan, such as the design policies and the policies which seek to support sustainable/active modes of travel, as well as local amenities within walking distance of where people live. These other policy areas can help to address sources of emissions that the Local Plan has less direct control over, such as transport emissions.

NET ZERO CARBON BUILDINGS IN OPERATION

5.4 New buildings contribute to carbon emissions in a few ways. Alongside the carbon cost of their construction (dealt with in the next section), the operation of a building can be an ongoing source of emissions due to how energy is sourced and utilised. Principally, emissions are associated with burning of fossil fuels for space heating and heating of water, as well as for cooking, but emissions are also associated with electricity use from the national grid. Ensuring net zero buildings in operation means ensuring they are as energy efficient as possible, this has additional benefits for reducing energy bills and risk of fuel poverty, as well as helping to reduce strain on the wider energy grid.

5.5 Key considerations for the policy:

5.6 The considerations which have informed the preferred approach so far are set out in Background Paper 008: Carbon reduction and climate resilient design. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- The city has a net zero carbon target of 2040, and there is a nationally legislated net zero target of 2050 through the Climate Change Act. Also, legal duty as set out in the Town and Country Planning Act, as well as guidance in the NPPF and PPG, sets a strong precedent for policy to address carbon reduction in new buildings.

- Newly permitted buildings once in operation will add to the city's carbon footprint where these are not heated and powered from renewable sources.

- National building regulations now, as well as future proposed updates, are unlikely to deliver full net zero buildings in operation for various reasons. They do not address all energy demands of a building, nor do they incentivise energy efficiency or meeting full energy demands renewably onsite.

- The calculation methodologies for modelling building performance under building control are ineffective at driving net zero design, meaning relying on national standards (or even Local Plan 2036 policy RE1) alone cannot deliver full net zero carbon buildings. Industry now generally recommends use of Energy Use Intensity metric alongside targets for total energy demand, space heating and onsite energy generation.

- Levels of fuel poverty are already above average in the city compared with regionally/nationally, and there are ongoing challenges of higher energy prices and energy insecurity due to national/international disruption.

- The local energy grid is already under pressure and likely to face additional pressures as society transitions to net zero, including electrification of transport and heat. The city's zero carbon roadmap identifies an ongoing need for installation of new micro renewables year on year to 2040.

- Whilst net zero carbon design looks to be financially viable and technically feasible for most standard types of development (subject to further viability testing), there will be typologies that find this standard more challenging including high energy demand use such as research and development, and healthcare. Feedback from local stakeholders as part of the LP2040 Reg 19 consultation reinforced this message. A more flexible approach, which still pushes for the highest standards is likely to be needed for these uses – such as higher or less specific targets for energy use, as well as allowances for offsetting.

5.7 How the draft policy responds to these considerations:

- The policy first and foremost encourages energy efficient design by requiring applicants to follow the principles of the energy hierarchy (reduce energy, use energy efficiently, source energy cleanly). This will help to drive applicants towards fabric-first approaches which drive down the energy demand it takes to operate the building in the first place and is more explicit than policy RE1 in the adopted Local Plan.

- The policy as proposed also diverts from the adopted policy RE1 in how it seeks to measure performance of new development—instead of setting carbon reduction targets as % reductions below Building Regs standards, it sets out Energy Use Intensity targets that will need to be met, which are a standardised way of measuring energy efficiency that can be applied to most buildings. There is one EUI target for total energy (the energy measured at the meter) and one for space heating (as a component of total energy).

- The total energy EUI target is different for residential development and non-residential and has been set with reference to a number of national sources

providing guidance on what is feasible for these broad typologies—these are set out in the net zero carbon design literature review.

- However, the policy wording also includes separate requirements for non-residential development with high energy demands. For these uses, it allows flexibility for applicants to propose a higher total energy EUI target, as long as this is robustly justified and evidence provided for the measures taken to reduce this as much as possible.

- Space heating EUI target remains the same across all development types. Applicants will also need to demonstrate no fossil fuel systems in the building.

- Renewable energy generation will need to match the total EUI of the proposed development in order to ensure that the capacity of microgeneration in the city is increased in line with additional energy demand generated by development. Whilst the preference is for this to be met onsite, allowances are made for applicants to provide some of this elsewhere (e.g. if they own other areas of land or buildings in the city) if they are unable to fully meet energy needs onsite due to site constraints such as having limited roof space to accommodate sufficient rooftop solar pv.

- The draft policy also allows for applicants to pay into a Council-managed energy offsetting mechanism where renewable energy generation cannot be fully provided for as part of the development (or directly offsite by the applicant). Payment into the offsetting scheme would be accepted as a last resort once all other options have been exhausted, but any funds collected would then be used to facilitate retro-fitting of existing building across the city.

- All applicants would be expected to demonstrate how they've met the various requirements of the policy through submission of an energy and carbon statement. Some types of applications such as conversions and change of use would only need to meet parts of the policy as it is not considered reasonable to apply all criteria. The policy also sets out expectations for how anything short of full compliance with the policy should be justified.

- The draft policy seeks to leave choices about technologies to applicants, and different systems will fit with the needs of different applications in order to meet the policy requirements. Applicants are expected to consider the potential for existing or future heat networks and how their development might integrate with these where appropriate. This may mean designing heating systems so that they have the ability to connect into a wider network in future if a network is coming forward in future. Choices should always be guided by what might be the most sustainable option for the building however.

- The technical nature of this policy means that it will likely need to be supported by additional guidance as set out in a Technical Advice Note (TAN). The TAN would cover how applicants should meet the various elements of the policy, as well as setting out methodologies that are acceptable for modelling performance and demonstrating alignment with the policy targets. The TAN would also likely reference best practice guidance, such as the emerging Net Zero Carbon Buildings Standard, which will be particularly relevant where applicants seek to justify performance that exceeds the policy targets under criteria 2, 3 and 5. It can also identify potential heat networks that may offer opportunities for additional connections in future.

Draft Policy R1 is the identified preferred approach from the various options relating to this issue considered in option set 008a of Background Paper 008.

DRAFT POLICY R1: NET ZERO BUILDINGS IN OPERATION

All new buildings should be net zero carbon in operation. This must be demonstrated through submission of an Energy and Carbon Statement that details how all the criteria below have been met:

1. Developments have been designed in accordance with the energy hierarchy. Applications should demonstrate how design has methodically followed the steps in the hierarchy, firstly through reducing energy use; using energy efficiently; and then, meeting all energy needs through renewables sources, ideally generated onsite, or else offsetting as a last resort.

2. A total Energy Use Intensity (EUI) figure for the development has been provided, calculated using an approved methodology as set out in supporting text. Developments will not be permitted where they exceed the following Energy Use Intensity targets (unless demonstrated to be technically unfeasible):
   - Residential: 45 kwh/m^2/yr
   - Non-residential: 70 kwh/m^2/yr
   - For non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, a higher EUI target will be accepted where it can be robustly justified, including the measures taken to limit this.

3. The portion of the development's total EUI associated with space heating is no more than 20 kwh/m^2/yr. Emerging best practice suggests 15kwh/m^2/yr will be achievable in many instances and achieving this tighter limit is encouraged.

4. No fossil fuels are being directly utilised in the operation of the development (e.g. no gas used for heating and cooking).

5. All energy needs (matching the development's total EUI figure) will be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage where possible. Where the total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation of sufficient additional renewable

generation at a location offsite. In these circumstances, it will need to be demonstrated in the Energy and Carbon Statement that offsite provision has been fully secured and will be in operation upon completion of the development.

As a last resort, where the above steps have been fully explored and net zero carbon still cannot be fully delivered, offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location. The Council will accept payment into the Council's offsetting fund that can be shown to fully offset this remaining energy demand, and this will be secured through an appropriate legal agreement/S106.

6. All new development must include information that specifies the approach to metering that will be adopted as well as proposed monitoring of the performance of the development to be undertaken post-completion (to ensure performance is in line with design specifications).

Proposals for conversions, and change of use (where they include works to the fabric of the building to facilitate this) that would require planning permission are only expected to demonstrate accordance with criteria 1 and 4, unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply. Extensions are expected to comply with criteria 1-3 unless they would result in the creation of a self-contained dwelling or non-residential unit, in which case all criteria apply.

The development of heat networks of varying scales will be supported where these can offer more sustainable heating choices and are in keeping with other policies in the Local Plan. Where development comes forward in areas with access to a heat network, now or in the future, connection into the network should be considered as part of the design process, particularly if this offers more sustainable means of heating/powering the building.

The City Council will expect that, having worked through requirements 1-6, Energy and Carbon Statements demonstrate compliance with the above criteria; however, a case for anything short of full compliance will be expected to be clearly justified as follows:

a) Full details of where a criterion cannot be met will be provided and justified within the Energy and Carbon Statement with explanation of the reasonable attempts to meet it provided; and
b) clarification that all other criteria are met or exceeded; and
c) the proposal is overall net zero carbon in operation (meaning no reliance on fossil fuels and including use of offsetting only as a last resort).

EMBODIED CARBON IN THE CONSTRUCTION PROCESS

5.8 There is an embodied carbon content within the materials used in the built environment and associated with the construction, maintenance, redevelopment and demolition processes. As energy use of developments becomes net zero carbon when they are in operation, the embodied carbon cost for constructing, maintaining and deconstructing

buildings will become the primary source of carbon emissions associated with them making this an important issue to address too.

5.9 Key considerations for the policy:

5.10 The considerations which have informed the preferred approach so far are set out in Background Paper 008: Carbon reduction and climate resilient design. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Embodied carbon/energy (including upfront carbon emitted during the construction process) is influenced by a wide variety of design choices such as: selection of materials, the places they are sourced from and how they are processed; the management of waste and recycling; and reuse or demolition of existing features on a site (such as buildings that might be able to be reused).

- Reflecting the complex interplay of factors impacting embodied carbon/energy, the assessment process for how much embodied carbon is associated with a new development can be equally complicated. For example, carbon will be emitted as a consequence of various design choices and construction practices, but carbon can also be locked away at greater levels than the amounts released during the manufacturing process for certain materials.

- The process of Whole Life Cycle Carbon Assessment helps to calculate embodied carbon across various life stages of a development (from cradle to grave). Understanding is likely to be more certain for the construction phase which is under greatest influence by the design process (the upfront carbon emitted as part of the development). Later phases are subject to increasing uncertainty as use of the building becomes more challenging to predict (e.g. carbon associated with maintenance, redevelopment, end of life).

- The planning system often needs to balance out various place-making priorities which can make judgements about embodied carbon impacts over other impacts difficult – there is unlikely to be a consistent single answer – e.g. is it better to replace an energy inefficient building in operation with a new more efficient building, or to force applicants to retain existing inefficient buildings to save the carbon locked up inside?

- National standards as set out in the building control system do not currently address embodied carbon/energy, nor do the proposed updates to these standards in their current form.

5.11 How the draft policy responds to these considerations:

- The draft policy seeks to set out key principles that will need to be responded to, although the principles of most relevance will likely differ from application to application, depending upon the type of development proposed and the specific site context. These principles will help to reduce upfront carbon emitted during construction in particular, but can also help with addressing the balance of embodied carbon associated with the lifetime of the development.

- The Council does not propose to include specific targets for upfront carbon/embodied carbon but the policy does ask applicants to detail, as part of their energy and carbon statement, how they have embedded the principles of the policy into their design so as to secure reductions in emissions as a result.

- Reflecting the likely more resource intensive and complicated nature of Whole Life Cycle Carbon assessments, the policy aims to require a more rigorous level of assessment of this nature only from the larger proposals expected to come forward in the city (the ones likely to have the most consequential impact in relation to carbon emissions). Alongside quantifying their embodied carbon/energy associated with the development, they would need to specify the reductions in this figure that they have secured through careful design choices, with a particular focus on upfront emissions associated with the construction stages.

- The threshold for requiring additional details, e.g. Whole Life Cycle Assessment, is currently proposed as being required from developments of 100 or more dwellings, or 10,000m2 or more non-residential floorspace. The threshold could be set at a lower level e.g. being required from all major development. This would mean more developments are considering embodied carbon at greater detail and showing how they have reduced this through good design but could incur additional costs and evidence requirements from more applicants.

- The draft policy set out below is considered to be an important stepping stone, bridging the absence of policy in Local Plan 2036 toward potentially more stringent policies in future Local Plans (unless national building standards are updated to address this issue). As industry understanding and guidance on this issues improves, future iterations of the Local Plan could reduce this threshold so that the assessment is needed of more types of proposals, or else introduce specific embodied carbon targets for development to limit embodied carbon to.

- As with the net zero buildings in operation policy, it is likely that additional guidance would be set out in a Technical Advice Note (TAN) for how to meet the specific elements of this policy as well as to point applicants to helpful resources to inform their design. The TAN could also advise on best practice in relation to limits that should be aimed for around upfront carbon/embodied carbon.

Draft Policy R2 is the identified preferred approach from the various options relating to this issue considered in option set 008b of Background Paper 008.

DRAFT POLICY R2: EMBODIED CARBON

All developments are expected to demonstrate consideration of embodied carbon for the lifetime of the development, particularly the upfront carbon in the construction process and take actions to limit this as much as possible through careful design choices. Planning permission will be granted for proposals that demonstrate through their Energy and Carbon Statement that the following principles are embedded in design choices:

a) Re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition.

b) Waste generation has been minimised and re-use and recycling of materials has been maximised in the construction process, including using any demolition materials.

c) The selection of construction materials has been informed by the carbon footprint associated with their sourcing and production (carbon footprint sought to be reduced wherever possible); use of materials that sequester more carbon than is produced in making them is prioritised where opportunities arise.

d) The ways that materials are transported to site and processed during construction have been chosen to minimise the associated carbon emissions wherever possible.

e) Design choices would allow buildings to be easily maintained, adapted and repurposed at the end of use/life.

Proposals for large scale new-build development (developments of 100 or more dwellings, or 10,000m^2 or more non-residential floorspace) will also need to be accompanied by details within their Energy and Carbon Statement that provide the following:

f) a measurement of total embodied carbon associated with the development (including upfront carbon associated with selection of materials). A recognised methodology should be followed to determine these quantities including submission of Whole Life Cycle Carbon Assessment.

g) details of actions taken to reduce this embodied carbon as much as possible, particularly the upfront carbon associated with the construction stages, and the specific quantitative reductions that have been secured through design process.

Where any future updates to Building Regulations (or other national policy) make embodied carbon requirements at a national level, the Energy and Carbon Statement should instead demonstrate how embodied carbon is being addressed in the context of that national legislation.

RETRO-FITTING EXISTING BUILDINGS, INCLUDING TRADITIONAL BUILDINGS AND HERITAGE ASSETS

5.12 Retro-fitting existing buildings to net zero carbon through energy efficiency improvements will be essential if we are to mitigate our impacts on the changing climate. Equally, retro-fitting has a role in facilitating adaptation of buildings to the changing climate and building in resilience to impacts like flooding and heatwaves to protect the health and wellbeing of occupants. Whilst retro-fitting can also be carried out sensitively and successfully to traditional buildings and heritage assets without harming their unique historic character, this needs to be undertaken in a more thoughtful and methodical manner for these particular types of structures.

5.13 Key considerations for the policy:

5.14 The considerations which have informed the preferred approach so far are set out in Background Paper 008: Carbon reduction and climate resilient design. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- The primary source of carbon emissions in the city comes from the built environment – the energy associated with heating and powering existing buildings. To reach the city's net zero carbon target of 2040, the Zero Carbon Oxford Partnership Net Zero Action Plan and Roadmap identifies a significant retro-fit challenge over the coming years.

- The ZCOP Action Plan and Roadmap requires various interventions across Oxford's existing buildings including transitioning heating systems to electricity-based technologies like heat pumps, installation of electric vehicle charging infrastructure, as well as installation of micro-renewables like rooftop solar PV across many buildings. Many of these interventions will not require planning permission, thus are outside of the influence of the Local Plan.

- The Local Plan can help to provide additional clarity and requirements for retro-fit projects which do engage the need for planning permission. In particular, retro-fit projects which impact upon traditional buildings and heritage assets which can often require a more sensitive and methodical approach to design, in order to preserve the special characteristics of these buildings, but also to avoid problems of maladaptation.

- Traditional construction practices often relied upon various passive ventilation measures which were key to ensuring older buildings could manage moisture and 'breathe'. Whilst Oxford's many traditional buildings and heritage assets are likely to benefit from retro-fitting measures, poorly designed interventions can lead to

maladaptive changes which interrupt these passive performance and lead to negative impacts which damage the buildings and harm occupants' health. They can also harm the special characteristics and qualities for which many such buildings have been nationally or locally designated.

- Ongoing engagement with Historic England during the preparation of Local Plan 2040 flagged the importance of guiding applicants towards a Whole Building Approach to retro-fitting of traditional buildings and heritage assets.

5.15 How the draft policy responds to these considerations:

- The starting point of the draft policy is one of supporting retro-fit projects that are designed to deliver benefits in terms of climate change mitigation (e.g. energy efficiency and carbon reduction) or climate change adaptation. This might include fabric efficiency improvements, replacing boilers with systems like heat pumps, installing renewable energy generation technologies, or features that can reduce flood risk or help address overheating.

- The draft policy also supports retro-fitting traditional buildings, including heritage assets, though these projects can be more complex. Additional requirements that applicants will need to factor into their application are set out to ensure these projects are undertaken in the right way for the building and its occupants.

- The principal consideration for traditional buildings/heritage assets is that a whole building approach is taken—this helps to ensure that any retro-fit project is fully informed by an understanding of how the building performs at present and what is about the building that makes it special from a heritage perspective. This will help to ensure that unintended negative impacts are avoided.

- The draft policy also makes it clear that retro-fit projects that secure benefits for energy efficiency or climate adaptation will be considered as public benefits, which is a relevant consideration in the balance of harm to existing assets. Each application will need to be determined based on its own specific considerations, however, so this public benefit would not automatically override concerns around harm, particularly where the relate to designated buildings.

- The Council has already published a supporting Technical Advice Note (TAN) which addressed the topic of retro-fitting heritage assets and it is likely that this TAN will remain of relevance to supporting this draft policy under the new Local Plan, with some minor updates. It may be appropriate to set out additional guidance in the TAN as part of future updates, including recommended best-practice performance targets for retro-fit projects that seek to deliver mitigation/impact on climate change as is currently emerging from various national bodies.

Draft Policy R3 is the identified preferred approach from the various options relating to this issue considered in option set 008c of Background Paper 008.

DRAFT POLICY R3: RETRO-FITTING EXISTING BUILDINGS

The Council will support retrofit measures to existing buildings where they secure energy efficiency improvements or adaptation to changing climate. The expectation is that the interventions are selected in accordance with the steps of the energy hierarchy (reduce energy use, use energy efficiently, source energy renewably) as set out in Policy R1.

A whole building approach should be taken to the retrofitting of traditional buildings, including heritage assets, whereby applications will need to demonstrate how the following principles have been embedded in the design rationale:

a) choices on interventions have been informed by a whole building approach which includes methodical assessment of the building's heritage significance, its current performance in terms of energy efficiency and climate risk, its use (now and in future), its context, and the selection of suitable materials;

b) any harm to the heritage significance of the asset has been minimised and mitigated as much as possible through careful design choices and in line with requirements of policies HD1-HD6;

c) professional advice has been sought from historic environment and energy/climate experts to inform proposals where necessary/appropriate;

d) all required consents have been secured, or are in the process of being secured, such as Listed Building Consent or consent for works affecting TPOs.

Measures that seek to deliver carbon reduction through energy efficiency or provide adaptation to changing climate will be considered as a public benefit in the balance against harm, although this will not automatically override any harm to an asset.

NATURAL RESOURCES

5.16 As well as carbon impacts of development in the city, there are a wide range of natural resources which need to be considered by new development. Natural resources such as the soil, air, and water are all important to health and wellbeing but also to the sustainable functioning of the wider natural environment that makes Oxford so special. As such, it is important that the development process considers these issues and mitigates its impact on them.

5.17 The second part of this chapter sets out five preferred policies for addressing different elements of the natural environment including air quality, water quality, soil quality, contaminated land, and amenity and environmental health.

AIR QUALITY ASSESSMENTS AND STANDARDS

5.18 Improving local air quality, mitigating the impact of development on air quality, and reducing exposure to poor air quality across Oxford is important for safeguarding public health and the environment. Some people are more vulnerable to poor air quality because they are at a heightened risk of negative health outcomes due to existing ill health (defined as sensitive receptors).

5.19 Key considerations for the policy:

5.20 The considerations which have informed the preferred approach so far are set out in Background Paper 009: Natural Resources. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are:

- The whole of the city was declared an Air Quality Management Area (AQMA) in 2010 due to historic exceedances in Nitrogen Dioxide levels. As well as nitrogen dioxide, other harmful pollutants of note in the city include particulate matter (PM10 and PM2.5) as well as ozone. Since then, air quality has been improving in the city.

- Whilst some people are more vulnerable to the health impacts of air pollution, such as the young and elderly, as well as those with pre-existing health conditions, air pollution presents a health risk to everyone to varying degrees.

- Recent source apportionment data for the city indicates that particular sources of air pollution in Oxford include transport (including tail-pipe, brake and tyre dust), domestic combustion (e.g. from boilers), and production processes (e.g. manufacturing and construction).

- The City Council has produced an Air Quality Action Plan (AQAP) which sets out a range of measures to improve air quality across Oxford, including adopting a local annual mean NO2 target of 30 µg/m3 by 2025. The AQAP is due to be updated in 2025 as the current plan runs from 2021 to 2025.

- The design of new development can exacerbate the problems of poor air quality if this issue is not considered as part of the design process e.g. through promoting reliance on private vehicles, exposing vulnerable occupants to existing poor air quality, preventing pollutants from dissipating easily in the wider environment. High-quality design can also help to avoid and mitigate the impacts of poor air quality.

5.21 How the draft policy responds to these considerations:

- The policy requires new development to mitigate impacts on air quality and minimise exposure to poor air quality, which can likely be achieved in a variety of ways through careful design.

- It is expected that particular attention is paid to issues of air quality when proposals relate to sensitive uses (meaning uses that could be occupied by those who are at particular risk from poor air quality).

- Major applications are required to submit an Air Quality Assessment (AQA) as part of their application, that fully considers the issue of air pollution, identifies negative impacts from the development and sets out how these will be mitigated. An AQA would also be expected of any proposals that are likely to involve significant demolition, construction or earthworks because of the potential for generating dust.

- The targets in the policy reflect the city's local air quality target for nitrogen dioxide via the AQA (which are more stringent than national targets).

- It is anticipated that further guidance on meeting the requirements of the policy would be set out in Oxford City Council's Air Quality Planning Application Guidance Note (as is the case with the Local Plan 2036).

Draft Policy R4 is the identified preferred approach from the various options relating to this issue considered in option set 009a of Background Paper 009.

DRAFT POLICY R4: AIR QUALITY ASSESSMENTS AND STANDARDS

Planning permission will only be granted where the impact of new development on air quality is mitigated, and where exposure to poor air quality is minimised or reduced, as far as is reasonably practicable as per the criteria set out in this policy.

The design and layout of new development (during construction and in operation) needs to consider the potential impacts upon air quality for current and new occupants. Sensitive uses such as schools, nurseries, care homes and healthcare settings, should be located away from areas of poor air quality as far as reasonably practical through careful site layout designed to protect human exposure to high pollution levels.

Air Quality Assessments (AQA) will be required for all major developments. Planning permission will only be granted for major developments where the AQA meets the following criteria:

a) provides an assessment of the impacts of all the sources of air pollution generated during the development's operational and construction phases, including but not limited to transport, heating, dust generated from demolition/construction/earthworks activities; and

b) has considered the cumulative impacts from other sources of air pollution in the local area where relevant; and
c) clearly identifies any potential negative air quality impacts, including where these would compromise achievement of the local annual mean air quality target for Nitrogen Dioxide (NO_2), as set out in the city's Air Quality Action Plan (AQAP); and
d) sets out appropriate site-specific mitigation measures to address negative impacts identified, following the principle of redesign – mitigate – offset.

Planning applications that involve significant demolition, construction or earthworks will also be required to submit a dust assessment as part of the AQA, to assess the potential impacts and health risks of dust emissions from those activities. Any appropriate site-specific dust mitigation measures will be secured as part of the Construction Management Plan (CMP) as required by Policy C6.

All applications are expected to follow the guidance set out in the latest Oxford City Council's Air Quality Planning Application Guidance Note.

WATER RESOURCES AND QUALITY

5.22 Water is a natural resource and a critical factor in safeguarding public health and wellbeing, the environment, and the long-term sustainability of local communities. Conserving and utilising water resources prudently whilst protecting and improving water quality across Oxford will be important to ensuring water supply and demand can be met safely for development now and in future, as well as for supporting biodiversity, including some of the city's most sensitive ecological sites.

5.23 Key considerations for the policy:

5.24 The considerations which have informed the preferred approach so far are set out in Background Paper 009: Natural Resources. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- In terms of water supply, the EA has identified Oxford to be in a "serious water stressed" area.

- Thames Water are responsible for water supply for the city and their Water Resources Management Plan notes several key challenges facing the management of water supply for the region in the future: a growing population, climate change, and the need to protect the environment. By 2050, without taking action, the plan projects a water supply shortfall for the region of 1060 million litres per day. Which increased to 1100 million litres per day by 2075.

- Water quality issues are ongoing in the city, with the majority of watercourses either classified as moderate or poor in ecological status for a variety of reasons. There are ongoing quality concerns particularly for Northfield Brook and the

Thames River. Water quality issues stem from pollution from a range of sources including agriculture, sewage discharge and surface run-off.

- There are currently concerns in relation to wastewater infrastructure in the city and upgrades are being proposed to the Wastewater Treatment works which services the city to address current capacity problems and future needs.

- Climate change is likely to put additional pressures on the water environment in future. Drier, warmer summers could put pressure on water supply and the quality of waterbodies in the city, as well as impacting the more sensitive habitats that rely on a certain hydrological profile to support species that exist there. Equally, more intense rainfall events could put additional pressures on wastewater systems and result in additional releases of pollutants into waterbodies without appropriate mitigation measures in place.

- New development has the potential for directly introducing a range of pollutants into water bodies on the surface and below ground where it is not appropriately mitigated. Equally, once in operation, its users can influence nearby water quality through increased demand on water supplies, as well as through output of pollutants which can be particularly harmful where this happens close to sensitive catchments.

5.25 How the draft policy responds to these considerations:

- The draft policy sets out various requirements guiding the design of new development in relation to water use and mitigating impacts on water quality. It encourages applicants to include a water awareness statement to demonstrate how policy requirements have been met in relation to water supply, efficiency and quality, although proposals for smaller-scale development may prefer to incorporate these details in another part of the application (e.g. Design and Access Statement).

- Whilst it is acknowledged that new development will incur some additional demand for water supplies, the draft policy seeks to ensure that water use is as limited as much as possible in recognition of the water stressed nature of the region, including through setting the tighter Building Regulations target for water consumption in new residential development of 110/litre/person/day (whilst also encouraging proposals to go further than this).

- Additionally, the draft policy asks that all non-residential development should demonstrate what measures have been incorporated to reduce and minimise water use. All applications should also demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse where appropriate.

- The development will need to demonstrate that there is no adverse impact on water bodies and groundwater, nor will it prevent future attainment of favourable conservation status, this may mean utilising a variety of measures, such as SUDs, pollution control in order to prevent spillages into watercourses etc.

- In addition, the draft policy also sets out expectations for how wastewater systems should be designed, in order to reduce strain on the wider wastewater infrastructure. This includes requiring developers to separate foul and surface water sewers on all new development and ensure that surface water is not discharging into the foul or combined sewer system. Taking up opportunities to separate foul and surface water during redevelopment are also encouraged.

Draft Policy R5 is the identified preferred approach from the various options relating to this issue considered in option set 009b of Background Paper 009.

DRAFT POLICY R5: WATER RESOURCES AND QUALITY

Planning permission will only be granted for new development that utilises water supplies prudently and protects water quality in line with the requirements set out below. Applicants are encouraged to include a water awareness statement to demonstrate how policy requirements have been met.

Water Supply/Efficiency

All new dwellings (including conversions, reversions, and change of use) achieve an estimated water consumption of no more than 110 litres per person per day using the 'Fittings Approach' as set out in Building Regulations part G2 (proposals are encouraged to go further than this). All non-residential development should demonstrate what measures have been incorporated to reduce water use.

All applications should demonstrate what other measures have been incorporated into the design to conserve water use including rain/grey water harvesting/reuse where appropriate.

Water Quality and Wastewater

Development proposals should demonstrate that development has no adverse impact on the quality of water bodies and groundwater, such as by:

- managing run-off and infiltration through utilising SUDs;
- putting measures in place to manage and contain sediment/pollutants particularly where in proximity to open watercourses;

Developers must separate foul and surface water sewers on all new development. Where opportunities are present during works on existing development, including householder extensions, applicants are encouraged to separate existing combined foul and surface water sewer arrangements.

No surface water from new development will be discharged to the public foul or combined sewer system: a Foul and Surface Water Drainage Strategy must be provided for all new build residential development of 100 dwellings or more; non-residential development of 7,200m2 or more; or student

accommodation of 250 study bedrooms or more, to demonstrate how foul water and surface water drainage will be managed to reduce run off and improve water quality in line with national policy.

SOIL QUALITY

5.26 Soils are a source of natural capital from which we derive many benefits including food production and flood mitigation, preserving water quality and acting as stores of organic carbon. The natural accumulation of soil can be a slow process and as such, soil should be considered to be a non-renewable resource which needs to be managed as such.

5.27 Key considerations for the policy:

5.28 The considerations which have informed the preferred approach so far are set out in Background Paper 009: Natural Resources. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- The development process can impact upon and deteriorate the quality of soils in various ways, such as through removal, compaction (e.g. with heavy machinery), sealing over with artificial surfaces and pollution. These impacts reduce the multi-functional benefits of soils for the wider environment, such as reducing ability to store surface water (reducing flood storage), ability to accommodate vegetation, storage of carbon.

- Some types of soils/substrates having particularly valuable benefits, such as peat deposits, which not only lock up greater amounts of carbon in the organic matter they contain, but also act as archaeological reserves. Whilst they have additional beneficial qualities, they also take much longer to accumulate and as such are much more difficult to replace.

- Mapping from Natural England's website has identified peat deposits at Dunstan Park, around the Churchill Hospital and Lye Valley, as well as along Littlemore Brook in the south of the city, although it is understood that this mapping is only approximate and there could be other deposits nearby.

5.29 How the draft policy responds to these considerations:

- There are two sections to the draft policy, the first addresses the need for all development to take actions to conserve and, where possible, enhance soils, where they are present. The policy sets out that the application will need to demonstrate how the design process been tailored to this and include some principles which should be responded to where they are relevant.

- Depending on the proposal and where it is located, not all of the principles in the policy may be relevant, but where they are, demonstrating how the design and construction process has sought to take them into account will help to show that impacts on soils have been considered appropriately.

- The draft policy sets out various ways that the principles can be responded to in an application.

- The second section of the draft policy addresses protections for the remaining peat deposits in the city. It sets out that permission would not be granted for proposals which would involve the removal or dewatering $10m^3$ or more of peat.

- In addition, to allow the Council to make an informed decision as to the impact of the development on peat and determine the significance of any potential losses, proposals for major development of undeveloped land upon an identified peat reserve in the city (as per Natural England mapping) will need to submit an assessment that details soil conditions and any existing peat reserve affected by the scheme alongside the application. This assessment will need to be informed by physical borehole sampling.

- To account for the known uncertainties in the Natural England mapping discussed above, the draft policy includes a 200m buffer around the known peat reserves. The assessment referred for proposals atop identified deposits would therefore also need to be submitted for proposals that fall within this wider area, so as to allow the Council to make a judgement as to potential impacts on unrecorded peat deposits that could be nearby. This scale of buffer has previously been discussed with Natural England and is considered to be an appropriate and pragmatic zone for the local context of the area over which to apply the additional assessment requirement.

Draft Policy R6 is the identified preferred approach from the various options relating to this issue considered in option set 009c of Background Paper 009.

DRAFT POLICY R6: SOIL QUALITY

Planning applications will be expected to demonstrate how the impact of development on soils has been mitigated and opportunities for conserving and enhancing the capacity/quality of soil maximised. The Design and Access Statement and associated landscape plans should include details setting out the following where relevant:

a) How impact on soils during the construction process has been minimised through avoiding: soil loss, compaction, pollution and reduction in the quality of soil; and

b) Development has been located in a way that avoids highest quality soils on sites where possible; and

c) Beneficial soil reuse and sustainable soil management has been implemented where possible; and

d) Artificial surface cover that seals off soils has been minimised.

Planning permission will not be granted for proposals that would remove or dewater 10m³ or more of peat.

Proposals for new major developments on undeveloped land upon, or within 200m of, known peat reserves should submit an assessment, informed by borehole sampling, to allow the Council to determine any potential impacts on reserves. The assessment should include details of the following:

I) The estimated carbon footprint of the peat impacted by development.
II) Its palaeo-archaeological interest.
III) Its function in the surrounding habitats.
IV) Its hydrological condition and stability.

LAND CONTAMINATION

5.30 Due to Oxford's extensive history of development, there are areas of the city which are likely to be affected by poor soil quality and the presence of contaminants that could be harmful for human health. For example, the city has a number of closed landfill sites of varying ages, some of which are still actively producing landfill gas, as well as previously developed sites that have been contaminated by historic industrial processes. Contamination can also arise from natural sources.

5.31 Key considerations for the policy:

5.32 The considerations which have informed the preferred approach so far are set out in Background Paper 009: Natural Resources. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- Various sites in Oxford have the potential for land contamination which can impact remediation requirements. Whilst almost all of the former major industrial sites have now been remediated and redeveloped, there remain a number of smaller sites that have the potential to be affected by contamination.

- The NPPF sets out that after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. Also, that responsibility for securing a safe development rests with the developer and/or landowner.

- The presence of contamination can restrict the use of land; development can also be an important mechanism in bringing land back into beneficial use through sustainable remediation processes that eliminate and/or control unacceptable risks in a safe and timely manner.

5.33 How the draft policy responds to these considerations:

- The draft policy sets out that proposals that could be affected by contamination will be expected to be accompanied by a report that shows how the issues has been investigated and sets out the details of any mitigation proposed to address any contamination identified (including remediation potentially).

- In assessing whether land contamination is an issue that needs to be taken into account when a planning application is submitted, the Council will have regard to a range of information sources including its database of potentially contaminated sites, information provided by developers and third parties, and the advice from the Council's specialists in the relevant area.

Draft Policy R7 is the identified preferred approach from the various options relating to this issue considered in option set 009d of Background Paper 009.

DRAFT POLICY R7: LAND CONTAMINATION

Planning applications where proposals could be affected by contamination or where contamination may present a risk to the surrounding environment, must be accompanied by a report which:

a) details the investigations that have been carried out to assess the nature and extent of contamination and the possible impacts it may have on the development and its future users, biodiversity, the built environment, land and controlled waters; and

b) sets out detailed mitigation measures to allow the development to go ahead safely and without adverse effect, including, as appropriate:
   I) removing the contamination;
   II) treating the contamination;
   III) protecting and/or separating the development from the effects of the contamination;
   IV) validation of mitigation measures.

Where site investigation and mitigation measures are needed, these will be required as a condition of any planning permission.

AMENITY AND ENVIRONMENTAL HEALTH IMPACTS OF DEVELOPMENT

5.34 New development can create environmental impacts, particularly during the construction phase, as well as once in operation. This can range from increased noise and vibration (e.g. from movement of trucks bringing materials to site, to presence of plant equipment on buildings once in operation), to the generation of dust and other contaminants (e.g. during demolition or processing of construction materials). These impacts need to be fully assessed during the planning application process to ensure that any potential nuisance resulting from the development can be properly mitigated to protect the amenity of residents, employees and the wider environment in the vicinity of the development.

5.35 Key considerations for the policy:

5.36 The considerations which have informed the preferred approach so far are set out in Background Paper 009: Natural Resources. In summary, the key considerations that have led to the suggested policy being proposed for Local Plan 2042 are as follows:

- New development can generate a variety of environmental effects that can negatively impact health and wellbeing, as well as the wider environment and the particular considerations of relevance will likely vary from application to application.

- Some of the impacts from new development arising from the construction process will be assessed and addressed through a construction management plan, but there may be wider considerations, e.g. once the development is in operation.

- The issue of noise and vibration can be particularly harmful for health, disturbing sleep, impairing concentration and having various physical and mental health impacts as a result.

- Impacts of noise on neighbouring uses arising from construction and the development in operation are not the only considerations, national policy is also clear that new development should be appropriate for its location—taking into account noise impacts from existing uses that could cause harm to new occupants. The applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.

5.37 How the draft policy responds to these considerations:

- The draft policy sets the requirements of new development in relation to avoiding and/or mitigating impacts on amenity and the wider environment.

- Various factors are set out that the Council will consider in determining compliance with the policy, though in practice, the factors may not all apply to every application – it will depend upon the proposal and the context of the location.

- Applicants may need to provide additional information as part of their design and access statement or via other reports/statements depending on what elements need to be demonstrated. For example, odour impacts on future occupiers of a sensitive development, such as residential, will be a particular consideration for applications that propose development in proximity to the Sewage Treatment Works and may need to be explored further through technical assessment.

- Because some of the considerations in this policy will be covered by a Construction Management Plan, there is likely to be some cross over with the Draft Policy C6.

- The policy includes additional requirements in relation to noise. The Council typically require the cumulative noise level from all proposed building services plant to be 5 dB below the representative background noise level. Noise levels that are 10 dB or more above the existing background sound level, are likely to be an indication of a significant adverse impact. If the level is 5 dB above the existing background sound level, it is likely to be an indication of an adverse impact.

Draft Policy R8 is the identified preferred approach from the various options relating to this issue considered in option set 009e of Background Paper 009.

DRAFT POLICY R8: AMENITY AND ENVIRONMENTAL HEALTH IMPACTS OF DEVELOPMENT

Planning permission will only be granted for development that:

a) ensures that the amenity of communities, occupiers, neighbours and the natural environment is protected; and
b) does not have unacceptable transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
c) provides mitigation measures where necessary.

The factors the City Council will consider in determining compliance with the above elements of this policy will also include where relevant:

d) visual privacy, outlook;
e) sunlight, daylight, overshadowing and mitigating glare from solar panels and windows where applicable;
f) artificial lighting levels;
g) transport impacts;

h) impacts of the construction phase including the assessment of these impacts within the Construction Management Plan (CMP) (refer to Policy C6);
i) odour, fumes and dust;
j) microclimate e.g. wind, overheating
k) contaminated land;
l) impact upon waste and wastewater infrastructure;
m) noise and vibration; and
n) preserving surrounding water quality.

Planning permission will not be granted for development sensitive to noise in locations which experience high levels of noise, unless it can be demonstrated through a noise assessment, that appropriate attenuation measures will be provided to ensure an acceptable level of amenity for end users and to prevent harm to the continued operation of existing uses.

CHAPTER SIX

A CITY THAT RESPECTS ITS HERITAGE & FOSTERS DESIGN OF THE HIGHEST QUALITY

HERITAGE ASSETS

CONSERVATION AREAS

Conservation areas are designated heritage assets. They are ‘areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.’ Oxford has 18 conservation areas which are listed in Appendix 6.1 and defined on the Policies Map. They include a diverse range of qualities, reflecting the story of Oxford, from the medieval walled city to surrounding agricultural settlements, the open green space found in the Headington Hill Conservation Area to the meadows of the river valleys such as Wolvercote and Godstow.

Things to consider when drafting the policy:

- Although varied in character, all conservation areas contain features that link us to our past, and the protection of these needs to be effectively managed, ensuring future generations will value and enjoy their special qualities.
- The NPPF sets out the policy approach for designated heritage assets, but each is individual, and the Plan can add detail/Oxford context.
- Conservation Area Appraisals describe what makes the distinctive character, appearance, and historic interest of the conservation areas, and associated management plans help to articulate appropriate responses to local issues and pressures.
- Conservation area appraisals and management plans provide a good starting point in creating good, contextually responsive new development.

How the draft policy responds to these considerations:

- The proposed policy requires full regard be given to any detailed character assessments and other relevant information set out in conservation area appraisals and management plans.
- The policy lists the type of features that may be characteristic in a particular conservation area, and these must be responded to sensitively.

Draft Policy HD1 is the identified preferred approach from the various options relating to this issue considered in option set 011a of Background Paper 011.

DRAFT POLICY HD1: CONSERVATION AREAS

Planning permission will be granted for development that respects and draws inspiration from Oxford's conservation areas, responding positively to their significance, character and distinctiveness and enhancing it where possible.

For all planning permission or listed building consent decisions affecting the significance of a conservation area or its setting, great weight will be given to the conservation of that conservation area and to the setting of the conservation area where it contributes to that significance or appreciation of that significance.

Certain features may be characteristic of a particular conservation area, and planning applications should set out how these have been responded to sensitively to avoid harm. These features may include but are not limited to:

- The urban grain such as specific settlement patterns, plot types and groupings of buildings and their relationship to each other and the wider area;
- Proportions, such as height and massing, may be characteristic and may be harmed by developments that do not relate well to these;
- Views, which includes long distance and close views, focal points at the end of a view, glimpsed views of spaces beyond and between;
- Setting of the conservation area and what the setting contributes to its significance;
- Trees and other landscape features, including views and backdrops to views;
- Boundary treatments, which may include railings, walls and hedges are often characteristic and add to the significance of the area; and/or
- Architectural details such as the palette of materials, windows and doors, proportions, and rhythms.

An application for planning permission or listed building consent for development which would or may affect the significance of a conservation area, either directly or by being within its setting, should be accompanied by a heritage assessment. This must be based on an understanding of the context and that includes a description of the conservation area and its significance and an assessment of the impact of the development proposed on the conservation area's significance.

A heritage assessment must include information sufficient to demonstrate:

a) an understanding of the significance of the conservation area, including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic, and environmental benefits they may bring and the extent to which its setting contributes to its significance; and
b) that the development of the proposal and its design process have been informed by an understanding of the significance of the conservation area including its setting and that harm to its significance has been avoided or where it's not possible, any harm has been minimised through thoughtful design; and
c) that, in cases where development would result in harm to the significance of a conservation area, including its setting, the levels of harm has been properly and accurately assessed and understood, that it is justified because alternative possibilities or design arrangements have been explored and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm.

Where a development proposal would cause harm to a conservation area that is less than substantial, this harm must be weighed against the public benefits of the proposal. Clear and convincing justification for this harm should be set out in full in the heritage assessment.

Substantial harm to or loss of significance of a conservation area should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a conservation area, planning permission or listed building consent will only be granted if all of the criteria in paragraph 214 (or equivalent in any update) of the NPPF (*National Planning Policy*

Framework) can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.

Conservation areas are listed in Appendix 6.1 and defined on the Policies Map.

LISTED BUILDINGS

Oxford has a very high concentration of historic buildings. It contains buildings of great rarity, group value and high aesthetic value, and with associations to people and events of history, that allow a visible understanding of the past of Oxford and the country, and that create a unique character and distinctiveness.

Things to consider when drafting the policy:

- The impacts of alterations to listed buildings on the significance of listed buildings and their setting could potentially be very harmful if not fully informed by an understanding of the significance of the building.
- Historic buildings may need to change, for example to be repaired and adapted to meet changing needs, which may be changing needs of occupants for example, or the need to respond to the climate emergency.
- It is important that change is carried out thoughtfully and in a manner that preserves the fabric of the building as well as notable features of the building or heritage asset that contribute to its significance and the reason it is protected.

How the draft policy responds to these considerations:

- The proposed policy aligns with the approach of the NPPF by requiring an assessment of the level of harm and then for this to be weighed against public benefits.
- The proposed policy makes it clear that the use of the building may also be of significance and that this needs to be considered in change of use applications.

Draft Policy HD2 is the identified preferred approach from the various options relating to this issue considered in option set 001a of Background Paper 011.

DRAFT POLICY HD2: LISTED BUILDINGS

Planning permission or listed building consent will be granted for development that respects and draws inspiration from Oxford's listed buildings, responding positively to their significance, character and distinctiveness. For all planning permission or listed building consent decisions affecting the significance of a listed building or its setting, great weight will be given to the conservation of that listed building and to the setting of the listed building where it contributes to that significance or appreciation of that significance.

An application for planning permission or listed building consent for development which would or may affect the significance of a listed building, either directly or by being within its setting, should be accompanied by a heritage assessment that includes

A) a description of the listed building and information sufficient to demonstrate an understanding of the significance of the listed building including

i. its rarity, group value and how it reveals its historic, architectural, archaeological and/or artistic interest and/or value for its associations to things that shape the identity and character of the area, the way it illustrates the past and helps our understanding of it, its aesthetic contribution to the area, and its importance to the community; and
ii. recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and
iii. the extent to which its setting contributes to its significance.

B) an assessment of the impact of the development proposed on significance of the listed building and its setting, including on the integrity of the building, its impact on group value and Oxford's/the local area's identity. The assessment should explain:
iv. how the development of the proposal and its design process have been informed by an understanding of the significance of the listed building; and
v. any measures within the proposal to enhance the significance of the listed building (including its setting); and
vi. how harm to its significance has been avoided; or
vii. in cases where development would result in harm to the significance of a listed building, including its setting, that the extent of harm has been properly and accurately assessed and understood, minimised as far as possible, and clearly and convincingly justified.

Where a development proposal will lead to harm to a listed building that is ess than substantial, clear and convincing justification must be provided within the heritage assessment. This should explain what alternative proposals have been considered and how measures have been incorporated into the proposal, where appropriate, that mitigate, reduce or compensate for the harm. Only then will the harm be weighed against the public benefits of the proposal.

Substantial harm to or loss of Grade II listed buildings should be exceptional. Substantial harm to or loss of Grade I and II* listed buildings should be wholly exceptional. Where a proposed development will lead to substantial harm to or loss of the significance of a listed building, planning permission or listed building consent will only be granted if all of the criteria in paragraph 214 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.

The use of a listed building may be part of its significance. Changes of use should:
C) be to a use which would not be harmful to the special interest of the building or its setting; and
D) be suitable without harmful reconstruction

REGISTERED PARKS AND GARDENS

Many parks and gardens in Oxford contribute significantly to its townscape and are an important part of appreciating and understanding its heritage. Historic England's National Heritage List includes 15 parks and gardens in Oxford, 5 of which are Grade I, 1 is Grade II* and 9 of which are Grade II. These are designated heritage assets. They represent a dense network of assets, a high proportion of which are highly graded, and they cover a significant proportion of the city, helping to frame the city's relationship with the River Cherwell. Many more parks and gardens are not registered but nevertheless contribute to local significance.

The majority of the Registered Parks and Gardens are related to colleges, conveying in rich detail the integrated way in which the colleges have been designed and developed. They have a pivotal role in shaping how the city's institutions and the boundaries between the public and private realms are experienced, for example because certain elements (such as some of the Quadrangles) are only glimpsed through entrances that are in near constant use. In addition to the colleges, Oxford's Registered Parks and Gardens include High Wall in Pullens Lane, Park Town and St Sepulchre's Cemetery.

The Core Green Infrastructure Network include both Registered Parks and Gardens and other parks and gardens. Protected under Policy G1, green spaces within the network perform a multitude of functions, ranging from flood control to biodiversity net gain. Some (such as Oxford Botanic Garden) have a particularly important educational role linked with botany, genetics and related research.

Key considerations when drafting the policy

- The Registered Parks and Gardens all have associated listed buildings and form a significant part of the setting of those listed buildings, so the impact of any proposals on associated heritage assets will also be a key consideration (see draft policy HD5), as will the potential for impacts on archaeological remains if below-ground works are proposed (see draft policy HD6).
- Because the nature of Registered Parks and Gardens in the city is that they are not stand alone heritage assets, but part of a wider heritage asset including listed buildings, the criteria in paragraph 214 of the NPPF referred to in policy HD3, those about viable uses, grant-funding and bringing the site back into use are unlikely to apply.
- The designation requires local authorities to consult Historic England on development affecting Grade I and II* Registered Parks. It also requires local authorities to consult the Garden History Society on works to all grades of parks and gardens.
- The effect of proposed development on a registered park or garden, or its setting, is also a material consideration in the determination of planning applications.

How the draft policy responds to these considerations

- The proposed policy takes a positive approach to Registered Parks and Gardens, expecting development to respect and draw inspiration from them
- The proposed policy follows the NPPF approach of requiring the level of harm to be understood and then balanced against public benefits.

Draft Policy HD3 is the identified preferred approach from the various options relating to this issue considered in option set 011a of Background Paper 011.

DRAFT POLICY HD3: REGISTERED PARKS AND GARDENS

Planning permission will be granted for development that respects and draws inspiration from Oxford's Registered Parks and Gardens, responding positively to their significance, character and distinctiveness and enhancing it where possible.

Any proposals that would result in harm to, or loss of, the significance of a Registered Park and Garden or its setting requires clear and convincing justification in a Heritage Assessment. Substantial harm to or loss of Grade II registered parks and gardens should be exceptional. Substantial harm to or loss of Grade I and II* registered parks and gardens should be wholly exceptional.

Where a proposed development will lead to substantial harm to or loss of the significance of a park or garden, planning permission (or other planning consents where relevant) will only be granted if all of the criteria in paragraph 214 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

SCHEDULED MONUMENTS

Scheduled Monuments are a type of designated heritage asset. A heritage asset is only designated a Scheduled Monument if it is of national importance and also if designation is the best means of its protection. Scheduled Monuments may nor may not be visible above ground. There are 9 Scheduled Monuments in Oxford, which are varied in age and type. They are the remains of Osney Abbey and Rewley Abbey, Oxford Castle and the City Walls, Seacourt Medieval Settlement, Old Abingdon Road Culverts, Grandpont Causeway, Port Meadow, and the Swing Bridge near Oxford Station.

Things to consider when drafting the policy:

- Scheduled Monument Consent (SMC) is required for any works that will affect a scheduled monument, through an application to Historic England, in addition to any application for planning permission.
- Historic England should be notified where SMC is required in addition to planning permission.
- The NPPF paragraphs relating to heritage assets apply to Scheduled Monuments.

How the draft policy responds to these considerations:

- The proposed policy requires that a heritage assessment is submitted that demonstrates an understanding of the significance of the asset, how the proposal is informed by this and that any residual harm is balanced against the public benefits.
- Pre-application engagement with Historic England is strongly encouraged for all proposals that are likely to affect the significance of a Scheduled Monument.

Draft Policy HD4 is the identified preferred approach from the various options relating to this issue considered in option set 011a of Background Paper 011.

DRAFT POLICY HD4: SCHEDULED MONUMENTS

An application for planning permission for development which would or may affect the significance of a Scheduled Monument, either directly or by being within its setting, should be accompanied by a heritage assessment.

The submitted heritage assessment must include information sufficient to demonstrate:

a) an understanding of the significance of the Scheduled Monument (including the extent to which its setting contributes to its significance), including recognition of its contribution to the quality of life of current and future generations and the wider social, cultural, economic and environmental benefits they may bring; and
b) that the development of the proposal and its design process have been informed by an understanding of the significance of the Scheduled Monument, that enhancement to the significance of the Scheduled Monument (including its setting) have been identified where possible, and that harm to its significance has been avoided or minimised; and
c) that, in cases where development would result in harm to the significance of a Scheduled Monument, including its setting, the extent of harm has been properly and accurately assessed and understood, that it is justified, and that measures are incorporated into the proposal, where appropriate, that mitigate, reduce, or compensate for the harm.

Where a development proposal would cause harm to a scheduled monument that is less than substantial, this harm must be weighed against the public benefits of the proposal. Clear and convincing justification for this harm should be set out in full in the heritage assessment. Substantial harm to or loss of significance of a scheduled monument should be wholly exceptional.

Where a proposed development will lead to substantial harm to or loss of the significance of a scheduled monument, planning permission will only be granted if all of the criteria in paragraph 214 (or equivalent in any update) of the NPPF can be demonstrated, or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.

NON-DESIGNATED HERITAGE ASSETS

Whilst some heritage assets are designated, such as listed buildings, not all heritage assets are designated. Non-designated heritage assets which may include buildings, monuments, sites, places, areas or landscapes that have been positively identified as having a degree of significance meriting consideration in planning decisions.

Things to consider when drafting the policy:

- Many non-designated heritage assets are identified in the Oxford Heritage Asset Register (OHAR). Whilst these assets do not merit a national-level protection, they do have a local relevance that is important to consider in determining planning applications (and in developing proposals).
- There are likely to be other heritage assets which are not yet identified on the OHAR. Non-designated heritage assets may be identified through the conservation area appraisal, neighbourhood planning or planning application process.
- The NPPF sets out the approach to non-designated heritage assets.

How the draft policy responds to these considerations:

- The proposed policy sets out the ways a non-designated heritage may be identified.

- The proposed policy requires consideration of the asset and how this may be incorporated into proposals.
- The proposed policy requires recording of the significance of any assets to be lost.
- The proposed policy aligns with the NPPF approach.

Draft Policy HD5 is the identified preferred approach from the various options relating to this issue considered in option set 011b of Background Paper 011.

DRAFT POLICY HD5: NON-DESIGNATED HERITAGE ASSETS

A non-designated building or group of buildings, monument or site, place or landscape will be considered a local heritage asset if it is found to have local interest, value, and significance. These assets may be identified through the Oxford Heritage Assets Register, conservation area appraisals, or the planning application process.

Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the asset's significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development.

In determining whether planning permission should be granted for a development proposal that affects a local heritage asset, consideration will be given to the significance of the asset, the extent of impact on its significance, as well as the scale of any harm or loss to the asset as balanced against the public benefits that may result from the development proposals.

Recording should take place to advance understanding of the significance of any assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and that is publicly accessible. The ability to provide publicly accessible recording will not be a factor in deciding whether such loss should be permitted.

Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the requirements of Policy HD4.

ARCHAEOLOGY

Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. The unique archaeological heritage of the city encompasses a wide variety of asset types. A few of these are formally designated heritage assets such as Scheduled Monuments, however many assets of comparable significance are not currently designated and warrant appropriate protection through the planning system. Notable assets include Palaeolithic and Mesolithic flint working sites, Neolithic and later prehistoric domestic, ritual, and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city. The town is also distinctive for its middle-late Saxon urban remains, its emergence as a major cloth trading town in the Norman period and for the numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges. Other assets of note include the town defences, the distinctive

remains associated with the medieval Jewish Community and the Royalist Civil War defences.

Things to consider when drafting the policy:

- Archaeological remains can't be renewed so it is essential they are managed carefully and treated with respect.
- New development has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated.
- Owing to the richness of archaeological remains in Oxford, especially in the medieval core, there is a danger that allowing the recording of deposits rather than preservation in situ for several individual developments will lead to significant degradation of the archaeological record.
- Development within the medieval core has a high potential to harm the heritage value of the sites, if not carried out sensitively. There are many things to consider as part of the design of developments at these sites, so a comprehensive approach is essential that ensures archaeology, and cumulative impacts on archaeology, is part of wider considerations of how to develop a site.
- Building designs should aim to preserve significant archaeology in situ. Where the loss of archaeological assets is warranted by the merits and public benefits of the development then archaeological investigation and recording, public outreach, storage of artefacts and the publication and dissemination of results may be an acceptable alternative
- Understanding and incorporating archaeological remains into current designs will add interest and local distinctiveness.

How the draft policy responds to these considerations:

- The City Centre Archaeological Area is defined as an area that has an exceptionally high concentration of archaeological remains, and so where any significant breaking of the ground will require an archaeological assessment.
- An archaeological assessment may also be required outside of specified areas where it is suspected there are archaeological remains.
- Further work to ensure adequate contextual assessment and mitigation may be required when there may be cumulative impacts.

There are known concentrations of past human activity in many parts of Oxford, and early discussion with the City Council to ascertain whether an archaeological assessment is required is strongly advised.

Draft Policy HD6 is the identified preferred approach from the various options relating to this issue considered in option set 011c of Background Paper 011.

DRAFT POLICY HD6: ARCHAEOLOGY

Within the City Centre Archaeological Area, on allocated sites where identified, or elsewhere where archaeological deposits and features are suspected to be present (including upstanding remains), applications should be accompanied by a Heritage Assessment. A Heritage Assessment should include and be informed by:

a) a description of the impacted archaeological deposit or feature (including where relevant its setting), incorporating information to define the character, significance and extent of such deposits or features; and
b) an explanation of how early assessment and field evaluation has informed design that aims to preserve deposits and features in situ, avoiding adverse effects from poor siting of foundations, drainage features and hard landscaping; and
c) an assessment of the impact of the proposed development on the significance of the deposits or features, using a proportionate level of detail that is sufficient to understand the potential impact of the proposal. The assessment should reference appropriate records (including the information held on the Oxford Historic Environment Record); and
d) if appropriate, a full archaeological desk-based assessment and the results of evaluation by fieldwork. This should be produced by an appropriately qualified contractor. Pre- application discussion is encouraged to establish requirements. In the City Centre Archaeological Area, where significant archaeological asset types can be shown to be subject to cumulative impact from development, the desk-based assessment should contain appropriate contextual assessment of this impact. The desk-based assessment in the City Centre Archaeological area should also include a whole site plan (which may be beyond the red line to include a whole campus site, for example) that shows current understanding of any basement and underground servicing, likely locations of hidden archaeological remains, other heritage assets (including settings) to be considered and explain how this whole-site understanding has helped inform decisions about the layout and location of the development.

Development proposals that affect archaeological deposits and features will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it.

Proposals which would or may affect archaeological deposits or features that are designated heritage assets will be considered against the relevant policy approach (Draft Policy HD2 Listed Buildings, Draft Policy HD4 Scheduled Monuments).

Subject to the above, proposals that will lead to harm to the significance of non-designated archaeological deposits or features will be resisted unless a clear and convincing justification through public benefit can be demonstrated to outweigh that harm, having regard to the significance of the deposits or features and the extent of harm. Where harm to an archaeological or paleoenvironmental asset has been convincingly justified and is unavoidable, mitigation should be agreed with Oxford City Council and should be proportionate to the significance of the asset and impact. The aim of mitigation should be to minimise harm, to promote public enjoyment of heritage and to record and advance knowledge. Appropriate provision should be made for investigation, recording, analysis, conservation of remains, publication, archive deposition and community involvement.

HIGH QUALITY DESIGN

PRINCIPLES OF HIGH-QUALITY DESIGN

The value and benefits of good design and improvements to quality of life are so significant that good design is not a nice extra, it is essential. A successfully designed scheme will be a positive addition to its surroundings. It may blend in or stand out, but it should not detract from existing significant positive characteristics in the area, and it may add interest and variety. A well-designed scheme will meet the needs of all users and will stand the test of time.

Oxford has a rich legacy of buildings from iconic architectural set pieces to smaller domestic, medieval houses in the historic core and locally distinctive buildings within the many villages that now form part of the city. There is therefore a wealth of inspiration in terms of building form and character and great opportunity for creative, high quality complementary character to enhance the existing built form.

Design quality should be considered throughout the evolution and assessment of proposals. Early discussion between applicants, the local planning authority and local community about the design of emerging schemes will help clarify expectations and allow the opportunity for creative ideas and problem solving to add value. The Council has a Design Review Panel wthat can give advice so that designs can be reviewed and improved at the informative stage prior to the formal determination of the application.

Things to consider when drafting the policy:

- To be successful, new buildings and alterations to existing buildings should be of high-quality design.
- To achieve high quality design, development should be informed and inspired by the unique characteristics of the site and its setting.
- Relevant context to consider will be the history and development of the site and surrounding area, landscape structure, biodiversity, the pattern, character and appearance of streets, buildings, and spaces. They should respond appropriately to the existing form, materials and architectural detailing and should not have adverse impacts on existing and neighbouring buildings. Placement, style and proportions of doors and windows will be important, as will the choice of materials.
- Unique site features identified will present an opportunity to shape design and offer the opportunity for reinforcing existing character or creating an individual character drawing on the context. Constraints identified will help provide clarity about potential issues and open up the opportunity to explore imaginative solutions to them.

  Holistic View for High Quality Design
- High quality design should be seen as part of a holistic view of looking at a place. It is not just a matter of scrutinising the external visual appearance of a building, although that is important in itself, but also the spaces around, and between buildings, and open spaces, whether public or private.

  Other Points of Reference
- The *National Model Design Guide* sets out and illustrates the governments priorities for well-designed places.
- Building for a Healthy Life (BHL) is the latest edition of one of the most widely used design guides used in England and has as its emphasis healthy placemaking.

A rigorous design process and design-led solutions are crucial to achieving new developments of high quality. Design should have a clear rationale and be informed and inspired by the unique characteristics of the site and its wider setting, including an understanding of heritage. To enable decision makers to properly understand and assess the final design, the design process must be clearly explained and justified. Policies are intended

to set out requirements for following a design process that will ensure development that responds to context including the immediate and wider surrounding and that works well for its intended use. Requirements for explaining the design process, including how early consideration of context has informed design, are also set out.

How the draft policy responds to these considerations:

- It requires a constraints and opportunities plan to explain how the context analysis has informed design development.

Draft Policy HD7 is the identified preferred approach from the various options relating to this issue considered in option set 011d of Background Paper 011.

POLICY HD7: PRINCIPLES OF HIGH-QUALITY DESIGN

Planning permission will only be granted for development of high-quality design that is responsive to its context, creates or enhances local distinctiveness, and ensures that the amenity of the natural environment is protected. Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 1.1.

All developments - other than changes of use without external alterations and householder applications - will be expected to be supported by a constraints and opportunities plan with supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement, Planning Statement or other demonstration of compliance with other plan policies that may be relevant), which should address the relevant checklist points set out in Appendix 1.1.

MAKING EFFICIENT USE OF LAND

Using scarce resources, including land, efficiently is vital to ensuring Oxford's sustainable growth and development. Oxford is a small, constrained city with a growing population. Oxford has some very densely developed areas, and it is a city with an effective record for re-using previously developed land efficiently. However, there is also potential to increase density in the city, particularly in transport hubs such as the city centre and the district centre, along main arterial roads, and in much of the suburban area that is less sensitive in terms of heritage and particularly heights (as set out in Draft Policy HD9).

Things to consider when drafting the policy:

- Making efficient use of land is particularly important in Oxford, due to competing needs and a lack of capacity.
- Making efficient use of land while delivering high quality design requires a holistic understanding of the context, including the needs of the proposed use, consideration of the natural and historic environment and any sensitivities present in the local area.
- Understanding sensitivities at the outset is important so that design can respond, for example by maintaining views, safeguarding archaeological remains by careful positioning of foundations.
- Transport hubs generally enable a greater density to be assumed.

- There is not a simple relationship between heights and density, there are numerous factors which combine to affect site capacity.

How the draft policy responds to these considerations:

- The draft policy requires the efficient use of land
- High indicative densities are set for nearly all locations in the city
- The contextual features that should be responded to in the design are listed in the policy

Draft Policy HD8 is the identified preferred approach from the various options relating to this issue considered in option set 011e of Background Paper 011.

POLICY HD8: MAKING EFFICIENT USE OF LAND

Planning permission will only be granted where development proposals make efficient use of land and maximise capacity. It is expected that sites across the city will be capable of accommodating development at an increased scale and density to their surroundings.

Proposals should demonstrate that the built form:

a) Maximises density; and
b) is appropriate for the use proposed; and
c) is informed by an understanding of the impacts on the significance of designated and non-designated heritage assets, including their setting and the potential for archaeological remains; and
d) protects significant green infrastructure features such as biodiversity habitats, public open spaces and mature trees and considers existing provision of these in the local area as well as opportunities to enhance greening and biodiversity on the site; and
e) considers the opportunities for net zero carbon design, including energy efficiency measures, maximising renewable energy generation, reducing carbon dioxide emitted through construction process, and preserving carbon sinks; and
f) considers presence of flood risk and, where relevant, locating more vulnerable uses in locations with reduced flood risk, less vulnerable uses in areas of higher risk.

It is expected that very high-density development (for residential development this will indicatively be taken as over 100dph) can be achieved in the highly accessible locations of the district centres, and in the city centre, where feasible in the context of the impacts on heritage. High density development (indicatively to be taken as over 80dph) will be expected at gateway sites (in mixed use areas on the edges of city on the main road network), and high suburban densities (indicatively to be taken as over 60dph) will be expected in most other locations.

VIEWS AND BUILDING HEIGHTS

Particular care needs to be taken over the design and placement of taller buildings in Oxford because development might be in the setting of the buildings that create the iconic ‘dreaming spires’. These buildings are a collection of nationally and internationally important buildings of historic and architectural significance. They sit in a compact area in the core of Oxford, which is raised slightly on a gravel terrace, giving more prominence to these historic buildings, and meaning that Oxford’s unique skyline can be viewed as a single entity whose composition varies

according to the direction of viewing. Taller buildings should not negatively impact on views of the iconic skyline.

Quality design of high buildings

If it is established that a taller building is appropriate in a particular location, it is important it is designed to ensure it contributes positively to the character of the area, that it does not detract from the amenity of its surroundings, that it is sustainable and creates a good internal environment. Certain aspects of the design of high buildings require particular and specific consideration. Whether a building is considered a high building will depend on the context. The High Buildings Guidance Technical Advice Note (TAN) should be referred to. This includes guidance on differing heights across the city where the impacts from those heights will be minimal. Higher buildings may still be appropriate, and the TAN also sets out design considerations for exceeding those heights. Policy HD9 sets out the requirements for technological representations of the visual impact of high buildings to aid decision making; non-technical representations may also be appropriate. Higher buildings will often be appropriate in district centres and on arterial roads.

Areas of Greater Potential

The High Buildings Study identified three areas of Oxford where proposals for new high buildings are more likely to be appropriate (Areas of Greater Potential shown in Figure 7 of the High Buildings TAN). These areas are less constrained by heritage considerations and represent areas where there is more potential for them to contribute to regeneration opportunities, and that have good connectivity and availability of existing facilities of district centres. The identified Areas of Greater Potential are the northern suburbs, the eastern suburbs, and the south-eastern suburbs.

Heritage

The addition of a high building in the setting of a heritage asset needs particular attention. A new high building adjacent to a heritage asset could cause harm for reasons including obstruction of valued views to or from the asset, visual competition, and incongruous design. Even at some distance from an asset a new high building may cause harm by obstructing a valued view towards that asset, or by changing the historic character of informative views towards or from an asset with visual competition in the foreground or background.

The historic core area

Although from certain points of view the towers and spires that make up the historic skyline seem to be spaced very widely, the area from which the silhouette emerges is, in fact, very compact and does not extend far beyond the old city wall within the central core. The area within a 1,200 metre radius of Carfax tower (defined on the Policies Map as the Historic Core Area) contains all the buildings that comprise the historic skyline. New buildings within the Historic Core Area have high potential to interfere with the character of the skyline, especially if their height is above that of Carfax Tower. These will be developments that exceed 18.2m (60ft) in height or ordnance datum (height above sea level) 79.3m (260ft) (whichever is the lower).

The fragility and small height and volume of the spires means the character of the skyline is particularly vulnerable to change. The aim of any design within the historic core area should be

to maintain the unique character and significance of views of the spires and to ensure that variability and interest in the skyline is maintained. Design of development in the foreground of views is also important. As well as not intruding through height, the design of foreground buildings should aid appreciation of view of the spires, rather than harming it through too great a level of uniform building height, bulk and massing that creates a flat and uninteresting foreground view that detracts from appreciation of the spires.

View cones

View cones are drawn as triangles from important viewing points to encompass the width of the area containing buildings that constitute Oxford's historic skyline. The 10 identified view cones do not represent an exhaustive list of viewing points that provide an important view of Oxford's skyline. There may be glimpses of the famous skyline in other locations, and tall buildings in particular that are proposed outside of the view cones might still have an impact on the historic skyline.

Within view cones, proposed new buildings must not detract from the skyline and composition, and even where they will not intrude directly on to it their effect as a frame to it must be considered. However, it is not just a bulky intrusion into the skyline that might be damaging; the foreground is also an important element of a view. Development of a low and uniform height that does not recognise the importance of rooftop detailing and modulation can detract from the view of the skyline in the whole, as well as having a negative effect on townscape.

A View Cones Assessment (2015)[2] has been endorsed by the City Council and is published on the City Council's website. It examines the contribution and significance of views, identifying their special qualities and elements. The View Cones Assessment sets out a methodology for heritage assessment of the Oxford views and applies this to each of the 10 view cones. The Study enables a greater understanding of the significance of all parts of the view, not just the skyline. It is designed to aid understanding of the impact of proposals on views, and should be referred to, understood, and reflected in designs within the view cones and the setting of view cones that might impact on the experience and heritage significance of the view. It should be remembered that, while some protected views are partly obscured by tree cover (especially in the summer), trees may become managed in the views in the future, so protection of the views is still important. Some views are from points outside the City Council's administrative boundaries. The City Council will work with Vale of White Horse to ensure these views are protected.

Roofscape and views

Views into the historic core from the surrounding landscape, including from the view cones, views out from the historic core, revealing the landscape setting of Oxford, and views across the core and from its edge to the green hills and floodplains are also important to consider. Even where buildings do not intrude directly into the skyline they may form a frame to it, and design choices should respond to this. To create more visual diversity that enhances the experience of the skyline, articulation of roofscape, and relatively short units of building are encouraged, with features to create a break in the line. A maximum ridge or parapet length of 25 metres without either a substantial vertical or horizontal break or interrupting features is a rule-of-thumb guideline that will

be followed for Oxford's skyline. The City Council will resist the loss of any features, such as chimneys, if the loss would result in a simplification of the skyline.

Key things to consider when drafting the policy:

- Taller buildings may be an appropriate built response to existing context.
- Successful design of taller buildings requires a particular range of considerations and design choice about height of buildings should consider a range of factors.
- These factors include the context of the immediate surroundings and the impact on surrounding amenity, the impact on views and heritage, and design to ensure a good and sustainable living environment.
- Within the city centre, there is a high potential that tall buildings may intrude on and potentially negatively affect the historic skyline.
- There are defined view cones, which protect the views of the historic skyline from key viewing points. Within these view cones, there is potential for poorly designed buildings to negatively affect these important views of the historic core.

How the policy responds to these draft considerations:

- The Policy identifies that the historic core area is particularly sensitive to high buildings.
- The requirements for design quality and evidence of impacts is particularly high for this historic core area.
- The policy references the High Buildings TAN, which provides significant guidance about determining appropriate heights.
- For any tall building (which is defined clearly by the policy), extensive evidence of its impacts is required.

Draft Policy HD9 is the identified preferred approach from the various options relating to this issue considered in option set 011f of Background Paper 011.

DRAFT POLICY HD9: VIEWS AND BUILDING HEIGHTS

Planning permission will only be granted for development that will retain the special significance of views of the historic skyline, both from within the historic core area and from outside the historic core area.

Planning permission will be granted for developments of appropriate height or massing. If the proposal is for development above the prevailing heights of the area and could impact on character or views, the application must demonstrate how all of the following criteria have been met:

a) design choices regarding height and massing have a clear design rationale; and
b) regard should be had to the guidance on design of higher buildings set out in the High Buildings Study TAN. In particular, the impacts in terms of the four visual tests of obstruction, impact on the skyline, competition and change of character should be explained; and
c) it should be demonstrated how proposals have been designed to have a positive impact on important views including both into the historic skyline and out towards Oxford's green setting, through their massing, orientation, the relation of the building to the street, and detailed design features including roofline and materials (including colour); and

d) taller buildings have been designed and orientated to avoid potential negative impacts, including on neighbouring amenity, such as overshadowing, overbearing and overlooking, reduced internal daylight and sunlight and wind-tunnel effects.

The area within a 1,200 metre radius of Carfax tower (the Historic Core Area) contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m (60ft) in height or ordnance datum (height above sea level) 79.3m (260ft) (whichever is the lower) are likely to intrude into the skyline. Development above this height must be limited in bulk and must be of the highest design quality.

Applications for any building that exceeds 15 metres (or the height that the High Buildings TAN says may be impactful in that area if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:

e) a Visual Impact Assessment, which includes the use of photos and verified views produced and used in a technically appropriate way, which are appropriate in size and resolution to match the perspective and detail as far as possible to that seen in the field, representing the landscape and proposed development as accurately as possible (produced in accordance with the Landscape Institute's GLVIA 3d Edition and Technical Guidance note TGN 06 19 or updated equivalents); and
f) use of VuCity 3D modelling (or equivalent if updated by the City Council in future), shared with the City Council so that the impact of the development can be understood from different locations, including any view cone views that are affected; and
g) heritage impact assessment if harm would be caused to the significance of a heritage asset or its setting (or a group of assets and their settings) informed by the methodology outlined in the Assessment of the Oxford View Cones report, a full explanation of other options that have been considered that may be less harmful, how that harm has been avoided or minimised, a justification that the benefits outweigh the harm and open book viability assessment if relied upon in the explanation.

Any proposals within the Historic Core Area or the View Cones that may impact on the foreground of views and roofscape (including proposals where they are below the Carfax datum point, for example plant) should be designed carefully, and should meet the following criteria:

h) they are based on a clear understanding of characteristic positive aspects of roofscape in the area; and
i) they contribute positively to the roofscape, to enhance any significant long views the development may be part of and also the experience at street level.

Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map.

ENSURING THE WELLBEING OF OCCUPANTS OF NEW AND SURROUNDING BUILDINGS

It is important to ensure that new buildings create spaces that are of an adequate size and layout, with sunlight and daylight so that they provide a high quality, well-functioning environment for occupiers. The impact on the amenity of surrounding occupants of existing buildings must also be considered. Buildings should provide an internal space that is flexible to meet the needs of a wide range of people and takes account of how needs may change over time.

HEALTH IMPACT ASSESSMENT

The built and natural environment is a key determinant of our health and wellbeing, and therefore it is crucial that through the planning system we plan for and design healthier built environments. Healthy built environments encourage and support good physical and mental health and also help to reduce health inequalities. To ensure that development in Oxford promotes and contributes to healthy place shaping, proposals should consider health outcomes from the outset.

Things to consider when drafting the policy:

- Health Impacts are an established tool for identifying how the proposed development will impact upon the relevant population groups and the key health issues, inequalities and priorities in the local area help
- HIAs should include relevant contextual analysis to help inform an assessment of impacts on the health environment and also consider the local health issues, inequalities and priorities with reference to published evidence/data where relevant, such as public health statistics.
- The analysis presented within the HIA should be of a sufficient level of detail to allow the Council to make a clear determination as to impacts the development will have on the health environment of the city.
- The analysis should be evidence based and set out how design of the development has taken into consideration the relevant health concerns and how it addresses these including where opportunities have been taken to achieve positive impacts and to avoid or mitigate negative impacts that could exacerbate issues and inequalities.

How the draft policy responds to these considerations:

- Applications for major development are expected to undertake and submit a Health Impact Assessment (HIA) in support of their application.
- The scope of assessment for the HIA, including the issues it needs to cover, will vary with the nature of the development, however the structure of the assessment will need to follow a logical format that addresses the key steps outlined in the policy.

Draft Policy HD10 is the identified preferred approach from the various options relating to this issue considered in option set 010a of Background Paper 10.

DRAFT POLICY HD10: HEALTH IMPACT ASSESSMENT

A Health Impact Assessment (HIA) is required to be submitted as part of the planning application for major development proposals.

The analysis within the submitted HIA should be of a sufficient level of detail to allow the Council to assess the potential impacts of the development on the health environment of the city and its residents. As a minimum, the assessment should include the following:

A) a description of the physical characteristics of the proposed development site and surrounding area, including the current use; and

B) identification of relevant population groups that could be affected by the development and associated health issues, inequalities and priorities in the area, which should be supported with appropriate evidence/data; and
C) an assessment of the impacts of the proposal on the identified population groups and local health issues, inequalities and priorities, including any potential positive and negative impacts, along with any mitigation measures incorporated into the design to reduce identified negative outcomes; and
D) details of monitoring which will be undertaken in relation to the proposed mitigation to be implemented.

The level of detail should be proportionate to the development and agreed with the relevant case officer. Applicants should refer to the additional information and guidance contained in Appendix 6.2 and the Council's Technical Advice Note.

PRIVACY, DAYLIGHT AND SUNLIGHT

Ensuring all homes are built with adequate privacy, daylight and sunlight (internal and external) helps to ensure the wellbeing of residents. It is also important to consider the impacts of proposals on neighbouring residential properties to ensure they do not lose their sense of privacy. This is particularly important in the context of Oxford, where high density development is expected in some areas of the city to make efficient use of land.

Things to consider when drafting the policy:

- It is important that new developments, in particular new homes, are designed to create positive living environments, homes that do not provide a good quality living environment are likely to need to be redeveloped in time which is not a sustainable approach.
- When planning new developments, regard should always be paid to the impact of windows overlooking other homes' windows (including French windows and patio doors) and gardens. Potential for unacceptable overlooking will depend on the proximity of windows to neighbours' habitable rooms and gardens and the angles of views and gardens.
- New homes' access to daylight and sunlight will depend both on the way new and existing buildings relate to one another, and the orientation of windows in relation to the path of the sun. Windows that are overshadowed by buildings, walls, trees, or hedges, or that are north facing, will receive less light.

How the policy approach responds to these considerations:

- The policy approach will ensure that new development provides adequate daylight and privacy for new residents
- The proposed policy will ensure that privacy and daylight in existing development is not reduced to an unacceptable level for neighbours.

Draft Policy HD11 is the identified preferred approach from the various options relating to this issue considered in option set 010b of Background Paper 10.

POLICY HD11: PRIVACY, DAYLIGHT AND SUNLIGHT

Planning permission will only be granted for new development that provides reasonable privacy, daylight and sunlight for occupants of both existing and new homes and sensitive workplaces such as schools. Proposals should demonstrate consideration of all of the following criteria:

A) whether the degree of overlooking to and from neighbouring properties or gardens resulting from a proposed development significantly compromises the privacy of either existing or new homes (or existing other uses where there might be a safeguarding concern, particularly schools); and

B) the size and orientation of windows in both existing and new developments in respect of access to daylight, sunlight, and solar gain (i.e. natural heating from direct sunlight); and

C) room depths in relation to maximising natural light; and

D) existing and proposed walls, hedge, trees, and fences, in respects of protecting or creating privacy and also in respect of their impact on overshadowing of both existing and new development.

To assess access to privacy, sunlight, and daylight in residential developments, the 25 degree and 45-degree guidelines will be used as illustrated in Appendix 6.3, alongside other material factors. On constrained sites with proposals for specialist accommodation, developers may use other methods to demonstrate that dwellings will receive adequate daylight.

Planning permission will not be granted for any development that has an overbearing effect on existing homes.

INTERNAL SPACE STANDARDS FOR RESIDENTIAL DEVELOPMENT

It is important to ensure that new homes are of an adequate size and layout to provide high quality, functional homes that meet the needs of a wide range of people and take into account how those needs might change over time. This should apply to development at all scales, from large strategic sites to infill development, which represents an important contribution to meeting Oxford's housing need. In addition, minimum bedroom sizes for HMO are governed by the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018.

Things to consider when drafting the policy

- The pressure to make efficient use of land, and the fact that dense development is to be encouraged, makes it particularly necessary to ensure that the internal living environment of new homes is adequate.
- The Government has set out nationally described standards. No local standards may be set; either policy can require use of national standards, or there can be no policy requirement.

How the draft policy responds to these considerations:

- There is considered to be a local need for space standards because of the pressure for land and potential for this to lead to very small units. There is no viability impact of taking

such an approach that would prevent delivery of homes, therefore, it is proposed that the optional nationally described standards will be adopted into policy.

Draft Policy HD12 is the identified preferred approach from the various options relating to this issue considered in option set 010c of Background Paper 10.

POLICY HD12: INTERNAL SPACE STANDARDS FOR RESIDENTIAL DEVELOPMENT

Planning permission will only be granted for new dwellings that provide good quality living accommodation for the intended use. All proposals for new build market and affordable homes (across all tenures) must comply with the Nationally Described Space Standards.

In flatted schemes, communal areas must be designed to enable neighbours to meet and interact, for example some fixed seating, and wider areas of corridor or lobby space.

OUTDOOR AMENITY SPACE

The adequate provision of outdoor amenity space is a key factor in supporting the physical and mental health and wellbeing of residents, allowing occupants to enjoy fresh air and light in privacy. Where high density development and subdivision of properties are expected and where many sites are infill development, high standards for the delivery of good quality outdoor amenity space become increasingly important. Usable outdoor space should provide a space to dry clothes, and grow plants and vegetables, and it can provide shade and limit urban heat-island effects. In addition, if the space is designed with permeable surfaces it can contribute towards flood risk management.

Things to consider when drafting the policy

- How to balance provision of outdoor space and maximising the capacity of the site
- How to ensure outdoor space is attractive and useable
- How to allow a more flexible and communal approach to outdoor space, whilst ensuring occupants will feel comfortable in the space

How the policy approach responds to these considerations:

- The draft policy allows balconies or private terraces to be provided for flats.
- The proposed policy allows for shared outdoor space, with small areas of private space for houses and larger flats.
- The size of garden required for houses (which could be part of a communal garden) is large enough for children to play in, and for family activities.
- Criteria are included to ensure high quality, useable outdoor amenity space is provided.

Draft Policy HD13 is the identified preferred approach from the various options relating to this issue considered in option set 010d of Background Paper 10.

POLICY HD13: OUTDOOR AMENITY SPACE

Planning permission will only be granted for dwellings (HMO and Use Class C3 except self-contained student accommodation) and the subdivision of dwellings, that have direct, well-related and convenient access to an area of private open space (in addition to bin or bike storage space), to meet the following specifications:

a) 1- or 2-bedroom flats and maisonettes should provide either a private balcony or terrace of usable, level space, or have direct and convenient access to a private or shared outdoor space.
b) flats and maisonettes of 3 or more bedrooms must provide private outdoor areas with space for outside dining and/or clothes drying, with a minimum dimension of 1.5 metres depth by 3 metres length. This may be either a private balcony or terrace of useable level space, or direct and convenient access to a private garden or shared garden with some private space (which should not feel isolated).
c) all houses should provide a private garden, of adequate size and proportions for the size of house proposed, which will be at least equivalent in size to the footprint of the dwelling as built originally. Where a directly accessible private outside area is provided, the remaining requirement for outdoor amenity space could be met by provision of shared private amenity space that can be directly and conveniently accessed. The private outdoor areas should allow space for outside dining and/or clothes drying, with reasonable circulation, which will require a minimum dimension of 1.5 metres deep by 3 metres long.

It should also be shown how the following factors have been considered in order to ensure an outdoor space that is adequate and attractive to use:

d) the location and context of the development, in relation to the layout of existing residential plots, and proximity to public open space; and
e) the orientation of the outdoor area in relation to buildings and the path of the sun so that the whole outdoor space will not be continuously in shade or over-exposed; and
f) the degree to which enclosure and overlooking impact on the proposed new dwellings and any neighbouring dwellings; and
g) the overall shape, access to and usability of the whole space to be provided; and
h) clear delineation between public and private space; and
i) for communal spaces that there is a variety of space, including provision of space to sit and to play, and that space is adaptable to the changing needs of residents, being easy to maintain with resilient materials, but with opportunities for communal gardening or food growing.

ACCESSIBLE AND ADAPTABLE HOMES

Housing provision across the city should meet the needs of everyone, which means provision must be made for those with disabilities. As such, it is important to consider the demands and requirements people will have from their homes and how this may change over time. Homes need to be built with the flexibility to be adapted to the changing needs of residents. Adaptability is important to respond to changes to the size and compositions of households, and an ageing population.

Providing opportunities for residents to maintain their independence is important and can help to alleviate pressure on health and social care if older people can remain in their homes, adapted

for their needs. In addition, housing needs to be adapted to support those with chronic health conditions and specialist housing needs.

Things to consider when drafting the policy:

- Oxford has a markedly young population compared to neighbouring districts and the UK, mainly because of the substantial number of students. This trend is likely to continue; however, people are living longer and there will be an increase in the number of older people resident in the city. The Census 2021 showed 5.3% of the population of Oxford are 75 or over (lower than the national average), a section of the population more likely to need adaptable homes in order to remain living in them for longer.
- The Census 2021 shows that 29% of households in Oxford have one or more people with a disability. Some of those households will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them. The Government has found that 34% of disabled people have had to make adaptations to their homes https://www.gov.uk/government/publications/uk-disability-survey-research-report-june-2021/uk-disability-survey-research-report-june-2021. Therefore, at least 15% of general market homes should be adaptable according to current needs.
- To ensure available provision for the full range of households on the housing register, and to avoid exclusion, for affordable homes all new homes should at least meet the M4(2) requirement to be accessible and adaptable.
- Local authorities can adopt a policy to provide enhanced accessibility or adaptability through Requirement M4(2) Accessible and adaptable dwellings and/or M4(3) Wheelchair user dwellings in 'Approved Document M: access to and use of buildings[4].
- Some typologies of development will not be suitable for providing homes that meet M4 requirements because these require level access to the front door, and so must have lifts if the entrance is not at ground level. Lifts have installation costs and ongoing maintenance costs (which are likely to affect residents' ground rents). This will affect viability and will not be feasible unless a certain number of units are served by one lift shaft. This will be less likely on lower blocks of flats.

How the draft policy responds to these considerations:

- Requirements for accessible and adaptable dwellings are set out in the policy to ensure the range of needs that will exist in Oxford can be met.
- Given the increasingly aging population and the proportion that are already over 75, the policy requires that 15% of market homes meet Category 2 Standards of Part M of the Building Regulations
- There may be other options, such as provision of one and two bed units in terraced houses instead of flats, maisonettes with accessible homes below and so on. But these options will often not be feasible, in which case the policy allows schemes with fewer or no dwellings that meet Part M of the Building Regulations.

Draft Policy HD14 is the identified preferred approach from the various options relating to this issue considered in option set 010e of Background Paper 10.

POLICY HD14: ACCESSIBLE AND ADAPTABLE HOMES

Proposals for residential development should ensure that all affordable dwellings and 15% of general market dwellings on sites of 10 or more dwellings are constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4.

5% of all dwellings for which the City Council is responsible for allocations or nominations, on sites of more than 20 dwellings, should be provided to Category 3 (wheelchair user) standards as set out in the Building Regulations Approved Document M4. These M4(3) dwellings should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation.

An exception will be made for flatted schemes that are of two storeys or fewer and/or that are smaller than 50 units, whereby planning permission will be granted when no dwellings meet the requirements of Building Regulations Approved Document M4, if the following conditions are met:

A) it can be demonstrated that there are strong design reasons for providing blocks of flats with a small number of storeys, and it is not purely to circumvent the requirement; and
B) it can be demonstrated that options to provide affordable units in an alternative way that enables level access have been explored, including where possible providing the dwellings required to meet M4 standards on the ground floor.

BIN AND BIKE STORES AND EXTERNAL SERVICING FEATURES

Good design is not only important to the internal layout of development but for a home to function properly and look attractive. Attention needs to be given to the design and location of storage facilities for bikes and bins at the initial stages of the design process. Servicing features such as meter cupboards, pipes and gutters, flues, vents, and aerials should also be considered early as they can collectively have a significant impact on the visual appearance of a property.

Things to consider when drafting the policy:

Examples of good practice can be found in the Parking and Bike Parking Technical Advice Note[5].

Consideration should be given to non-standard bike storage such as cargo bikes and trikes.

- As so many residents cycle in the city and we want to encourage more cycle trips instead of using the private car, new development must incorporate well designed, secure and easy to use bike storage facilities.
- It is essential that new development optimises the opportunities for residents to recycle as much waste as possible. Ensuring that there is adequate, well-placed space for the range of bins required will enable this.
- The location of bin stores needs to be accessible to be collected efficiently
- Stores and servicing features can detract from the appearance and amenity of the area if not well designed.

- Guidance on the numbers and sizes of bins that are required for different types of development and design and placement of stores is set out in the Technical Advice Note on Waste Storage[6].
- Servicing features can also create a cluttered appearance and detract from the design of the development, but they can sometimes be designed as an integrated element of the architecture that can contribute positively to the overall design of the buildings or development. Detailing of these features can be an important contributor to the character of the area.
- As the city moves towards becoming net zero there will need to be infrastructure to support this to include sufficient EV (Electric Vehicle) chargers, which needs to be carefully designed into new developments.

How the draft policy responds to these considerations:

- The policy approach seeks to ensure that careful attention is given to the positioning, design and materials used for external servicing features in new development, or if added to existing development.

Draft Policy HD15 is the identified preferred approach from the various options relating to this issue considered in option set 011g of Background Paper 011.

POLICY HD15: BIN AND BIKE STORES AND EXTERNAL SERVICING FEATURES

Bin and bike stores should be provided in new development and these and external servicing features should be considered from the start of the design process. For new schemes, planning permission will be granted where it can be demonstrated that:

a) bin and bike storage is provided in a way that does not detract from the overall design of the scheme or the surrounding area, whilst meeting practical needs including the provision of electric charging points for e-bikes where applicable; and
b) external servicing features have been designed as an integrated part of the overall design, or are positioned to minimise their visual impact; and
c) materials used for detailed elements such as for stores or rainwater goods are of high quality so they enhance the overall design and will not degrade in a way that detracts from the overall design.

Planning permission will be granted for new bin and bike stores relating to existing developments unless they would cause significant harm to amenity through poor design and siting.

CHAPTER SEVEN

A LIVEABLE CITY WITH STRONG COMMUNITIES AND OPPORTUNITIES FOR ALL

FOCUSING TOWN CENTRE USES IN OUR CITY CENTRE AND DISTRICT CENTRES

7.1 Oxford is a very liveable and accessible city which, owing to its compact nature that means that most people have access to a range of services to meet their daily needs within a 15–20-minute walk or by a short cycle ride. If the facilities that people need to reach are not accessible on foot or by bicycle, then the good network of public transport across the city can be used to reach locations which may be further away such as the hospitals, the greater range of facilities available in the city centre or district centres.

7.2 The Covid-19 pandemic highlighted to us all the importance and value of having a variety of easily accessible facilities and their role in helping create strong communities and "liveable cities". A range of policy tools can be used to help achieve, support and sustain liveable cities. These include, protecting certain facilities, maintaining the vibrancy of our centres, managing parking, and requiring travel plans and transport assessments when new developments are proposed and implemented. This ensures traffic is well managed and that walking, cycling and public transport are prioritised, consistent with Oxfordshire County Council's adopted *Central Oxfordshire Travel Plan*[1] and the transport user hierarchy policy it promotes.

CITY, DISTRICT AND LOCAL CENTRES

7.3 The city and district centres are areas that are highly accessible mobility hubs and that include a broad range of facilities including shops, hospitality, community and leisure facilities. They have an important role to play in creating liveable neighbourhoods. Local centres are more entwined with quieter residential areas, have less activity than district centres and may not be key transport interchanges or have parking facilities. However, they will have a mix of uses, usually that include offices as well as shops, often cafes or pubs and potentially other facilities and community uses such as dentists, post offices and community facilities.

[1] Central Oxfordshire Travel Plan

Key things to consider when drafting the policy

- The city and district centres are areas that are highly accessible mobility hubs and that include a broad range of facilities including shops, hospitality, community and leisure facilities. Centres have an important role to play in creating liveable neighbourhoods.

- The NPPF approach should be followed, which is that town centre uses should be directed to the city centre, district, and local centres, then edge of centre locations and only outside of these where no alternatives are available, and the site is suitable.

- Use Class E is very broad (including commercial, business and service uses including retail, cafes and restaurants, leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres), health centres, GPs and clinics, offices) and premises can change freely (without planning permission) between these uses.

- The NPPF says that an impact assessment should be required for retail and leisure development outside of town centres and not in accordance with an up-to-date development plan. The threshold may be set locally.

- Because Use Class E is so broad, and these uses are all allowed in principle in any defined town centre (which includes district centres and local centres) it is important the defined locations are suitable for these uses

- The NPPF is clear that small parades of shops with a purely local function do not meet the definition of local centres, so most parades are not included in this category, but their local importance is still significant in terms of creating liveable cities.

- The availability of hot-food takeaways can encourage unhealthy eating habits that are harmful to health, so limiting new hot-food takeaways could be beneficial, although these uses can also be popular and help to support local centres.

How the draft policy responds to these considerations:

- The policy proposes continuing to identify the city centre and long-established district centres as town centre locations

- Many local centres have also been defined for some time, and it is proposed to continue to define those as they all are more than a parade of shops of only neighbourhood interest

- In addition, Underhill Circus and Magdalen Road are proposed as local centres. The significant community facility at Underhill Circus and the importance of the area locally mean it is a suitable location for town centre uses. Magdalen Road has a variety of businesses, including office and employment buildings and cafes that have a greater than local reach.

- Local centres are suitable for Class E (commercial) uses and local community facilities (Class F.2) but not student accommodation or hotels. Visitor and cultural attractions and institutional and educational uses may be suitable, depending on the existing character of the centre and the exact nature of the use proposed (see Policy C4 and C5).

- New hot food takeaways are not permitted outside of town, district or local centres, preventing their spread outside of areas where they are already prevalent.

Draft Policy C1 is the identified preferred approach from the various options relating to this issue considered in option set 013a of Background Paper 013.

DRAFT POLICY C1: CITY, DISTRICT AND LOCAL CENTRES

The city centre and district centres defined on the Policies Map are:

- City centre
- Cowley centre
- Cowley Road
- Summertown
- Headington
- Blackbird Leys

Local Centres defined on the Policies Map are:

- St Clement's;
- Walton Street and Little Clarendon Street;
- High Street east;
- Rose Hill;
- North Parade Avenue;
- Magdalen Road
- New Marston; and
- Underhill Circus.

In the city, district centres and local centres, new Use Class E and other main town centre uses will be permitted where compatible with other policies in the plan, which include:

- Retail, cafes and restaurants;
- Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres);
- Health centres, GPs and clinics;
- Offices, research and development and light industrial;
- Community facilities;
- Residential (where compliant with the active frontages policy, including student accommodation in the city centre and district centres, but not in the local centres);

- Visitor attractions (Sui Generis uses including pubs, cinemas, live music venues, concert halls, dance halls);
- Short stay accommodation.

Proposals for new hot food take-aways will not be permitted outside of the city, district or local centres.

A sequential approach should be taken for locating new town centre uses. Applicants must demonstrate how the sequential approach has been applied if town centre uses are proposed outside the city centre, district and local centres, looking at edge of centre areas first then accessible locations well connected to the town centre.

Where the applicant demonstrates an out-of-centre location is justified as no alternative sites are available and where this is not contrary to other policies of the Plan, planning permission will only be granted where all the following criteria are met:

- It has good accessibility by walking, cycling and public transport; and
- impacts on the road network can be mitigated; and
- That no unacceptable harm or loss of amenity will be caused to adjoining land uses.

Planning permission for retail and leisure proposals outside of a defined centre of greater than 350m^2 floorspace, will only be granted if a retail impact assessment is submitted with proportionate evidence to demonstrate there is no negative impact on the vitality and viability of existing centres, by assessing:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposals;
- The impact of the proposal on town centre centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment.

MAINTAINING VIBRANT CENTRES

7.4 The city centre and each district centre have a distinct character, with a different mix of uses and different strengths and weaknesses. To maintain the strength of the centres, development should respond to and enhance the individual character of the centres.

Key things to consider when drafting the policy:

- Securing activity at ground floor level is important to achieving vibrancy;
- Sufficient flexibility is important to respond to changing needs and habits;
- Retaining the vibrancy of existing centres where uses are clustered is important to reduce travel and enable linked trips.
- The centres are transport hubs on main routes and able to sustain densification, for example because parking is not required and dense infilling

of some height is generally acceptable. This can help meeting needs, such as housing need

How the draft policy responds to these considerations:

- Policy provides design principles to guide future developments and ensure opportunities are taken to enhance and strengthen the character and attractiveness of the centres, helping maintain their robustness by encouraging people to visit and linger.

- Active frontages defined where a minimum threshold is set for the proportion of Class E (commercial, business and service uses) at ground floor level.
- The thresholds are set at a level that all centres are currently achieving so the focus of the policy is on retention.

- Any proposed new use, even when the overall frontage would remain above the threshold, will be expected to show how activity will be maintained. This can be done by demonstrating that it will attract footfall, retain an active window display, and not adversely affect the amenity, availability of services or appearance of the frontage.

- Blackbird Leys District Centre does not have a defined active frontage because the nature of that centre is as a vital community hub, with a wide range of important community functions, many of which are not Use Class E.

Draft Policy C2 set out below is the preferred approach from the various options relating to this issue considered in option set 013b of Background Paper 013.

DRAFT POLICY C2: MAINTAINING VIBRANT CENTRES

The city centre and district centres defined on the Policies Map are:

The densification and growth of district centres and the city centre is encouraged. High density development is generally expected in the city centre and district centres as set out in Policy HD8, and this should be low car.

Planning permission will be granted for new development within the district centres and city centre where it takes opportunities to deliver the following, where relevant:

a) improved permeability and connectivity to existing development and wider transport links;
b) intensification of development to create a high-density centre, including by more efficient use of land, by consolidating uses and through infill;
c) more residential development, including on the upper floors of existing commercial premises;
d) enhancement of existing buildings and improvement in their relationship to the street by creating active frontages;
e) rationalisation of public car parking so it is well-located, limits surface-level parking and is reduced where possible, and makes better use of workplace surface-level car parking;
f) public realm improvements for cyclists and pedestrians and public transport users and rebalancing of the space within streets from vehicles to pedestrians;
g) improved pedestrian connections across the main roads through the centres;

h) enhancement and new opportunities for public realm and landscaping such as tree planting, including incorporation of small green spaces where people can stop, dwell, socialise and play;
i) better integration of the landscape setting and surrounding green spaces;
j) enabling of the continued successful operation of any street markets;
k) improvements to shopfronts and signage;
l) enhance and better reveal heritage assets and their setting.

Active frontages

Planning permission will be granted at ground floor level of the defined Active Frontages (as set out on the Policies Map) for town centre uses that promote the vitality of the centre, and where the proportion of units at ground floor level does not fall below the threshold percentages of Use Class E set out below. Proposals for any new use within the defined active frontages of the city, district and local centres, even when the overall frontage would remain above the threshold, will be expected to promote the vitality of the centre. Planning permission will be granted if it can be demonstrated how activity will be maintained by:

a) attracting footfall; and
b) creating and retaining an active window display; and
c) not adversely affecting the amenity, availability of services or appearance of the frontage.

Centre name	Threshold % of Use Class E
Headington District Centre	80%
Summertown District Centre	80%
Cowley Road District Centre	75%
Cowley Centre District Centre	80%
City Centre primary frontage	90%
City Centre secondary frontage	70%

Planning permission will only be granted for development of upper storeys of the Active Frontages for housing, student accommodation and other uses appropriate to a town centre, as long as the functioning of the ground floor unit(s) in the active frontage is not undermined.

Local Centres

Planning permission will only be granted at ground floor level within the Local Centre Active Frontages for main town centre uses that promote the vitality of the centre and where the proportion of units in the Local Centre at ground floor level in Use Class E does not fall below 80% of the total number of units.

Planning permission will only be granted for development of upper storeys of units in the Local Centres for housing and other uses appropriate to the location.

The City Centre, District Centres, Local centres and Primary and Secondary Active Frontages and Local Centre Active Frontages are all defined on the Policies Map.

COMMUNITY, INSTITUTIONAL, SOCIAL AND CULTURAL FACILITIES AND ATTRACTIONS

7.5 It is important that our communities are supported by the appropriate infrastructure and community facilities. Providing and improving access to educational, health and community facilities greatly improves the quality of life for residents, builds strong communities and helps to address inequalities.

7.6 Cultural and community facilities can be very wide ranging and fall within different use classes. Facilities important to local communities may include community centres, schools, children's centres, meeting venues for the public or voluntary organisations, public halls and places of worship, leisure and indoor sports centres, pavilions, stadiums, public houses, club premises or arts buildings that serve a local community. These are important in meeting social, economic, health, leisure, cultural and religious needs of Oxford's diverse communities.

7.7 In seeking social inclusion and a high quality of life, the City Council's approach is to make accessible a diverse range of facilities, from performance venues to libraries. Sometimes co-locating multiple facilities on a single site can be an efficient way to improve accessibility and support the principles of a liveable city.

PROTECTION, ALTERATION AND PROVISION OF NEW LOCAL COMMUNITY FACILITIES

7.8 Community facilities make a valued contribution to the health and wellbeing of local residents. Local community facilities fall into Use Class F.2 of the Use Classes Order. This includes halls or meeting places mainly for the local community, indoor and outdoor pools, and skating rinks, and the policy applies to these. However, Policy C3 does not apply to places for outdoor sport and recreation (which are within the Use Class F.2), because these are dealt with in Policy G1. The City Council will seek to protect existing local community facilities and will support improvement and more intensive use of existing sites. Shops of no more than 280m^2 in size and 1km from a similar facility are classed as having a local community use within Use Class F.2.

Key things to consider when drafting the policy:

- Sometimes facilities might not be fit-for-purpose, or they may provide poor accessibility, so improvements on site or nearby might be more sustainable.
- Co-locating multiple facilities on a single site can be an efficient way to improve both quality and accessibility.
- Some local community facilities may have scope to provide some affordable workspace in accordance with Policy E3 to support small startup businesses whose location complements these local community uses.
- All other shops are Use Class E and can change freely to any commercial use.

How the draft policy responds to these considerations:

- It provides criteria to assess new developments against, including that opportunities are taken to secure community use agreements.

- It seeks to protect facilities, setting out the criteria which must be met if a loss of facilities is proposed, ensuring that community function is re-provided.

- To protect local community shops, their expansion to a size where they would fall outside of Use Class F.2 will not be permitted.

Draft Policy C3 set out below is the preferred approach from the options considered in option sets 013c and 013d of Background Paper 013.

DRAFT POLICY C3: PROTECTION, ALTERATION AND PROVISION OF LOCAL COMMUNITY FACILITIES

Planning permission will be granted for new local community facilities and the improvement and expansion of existing facilities where the City Council is satisfied that the following criteria are met:

a) the location is easily accessible by walking, cycling and public transport; and
b) the proposal will not result in an unacceptable environmental impact or loss of amenity.

Opportunities will be taken to secure community use and joint user agreements.

Planning permission will not be granted for development that results in the loss of such facilities unless:

- suitable replacement can be provided on-site, or at a location equally or more accessible by walking, cycling and public transport; or
- there are facilities nearby and within the neighbourhood that can be enhanced to ensure none of the local community function and accessibility is lost; or
- the proposal is for an alternative community facility for which there is greater need or demand.

Planning permission will not be granted for the expansion of shops that meet the definition of a local shop within Use Class F.2 if they would become large enough to be classed as Use Class E rather than F.2.

PROTECTION ALTERATION AND PROVISION OF LEARNING AND NON-RESIDENTIAL INSTITUTIONS (INCLUDING SCHOOLS, LIBRARIES AND PLACES OF WORSHIP)

7.9 Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities. Close partnership working will be essential to ensure that communities continue to have the best possible access to facilities. The City

Council has been working closely with partners including Oxfordshire County Council as the Local Education Authority to plan the educational needs of the city and will continue to work in partnership to ensure that new development is provided with access to school places, and that existing access is enhanced and improved when opportunities arise.

Key things to consider when drafting the policy:

- These facilities can attract large numbers of people, sometimes from quite a wide area, so it is important that new facilities are in accessible locations that minimise any potential traffic impacts and that there is no loss of amenity to existing surrounding uses.

- When a facility is to be redeveloped it must not conflict with existing uses but complement and enhance them.

- The City Council welcomes the opportunity to see the most effective use of buildings, which shared use and public access to facilities could help promote.

How the draft policy responds to these considerations:

- Existing facilities are protected, unless it can be clearly demonstrated that they are no longer required to meet the community's needs.

- Criteria are included to consider new uses against to ensure they are suitably located and potential harmful impacts are mitigated.

- The policy supports the use of joint user/shared user agreements where possible.

Draft Policy C4 set out below is the preferred approach from the various options relating to this issue considered in option sets 013e and 013f of Background Paper 013.

DRAFT POLICY C4: PROTECTION, ALTERATION AND PROVISION OF LEARNING AND NON-RESIDENTIAL INSTITUTIONS*

Planning permission will be granted for new learning and non-residential institutions (use Class F.1) where the following criteria are met:

- The development will be accessible to those who will use it by walking, cycling and public transport and will not create unacceptable traffic impacts; and
- The proposal will meet local needs or an existing deficiency in provision or access, or the proposal will support regeneration or new development; and
- The proposal will not result in an unacceptable environmental or local amenity impact; and
- Where possible, joint user and shared user agreements are made.

Planning permission will be granted for the redevelopment of learning and non-residential institutions (Use Class F.1) where it can be demonstrated that:

- If there are any new uses to be introduced, these will not conflict with the existing use and any loss of floorspace of the existing use will not result in it not being able to function and meet needs;
- The development will be accessible to those who will use it by walking, cycling and public transport and will not create unacceptable traffic impacts;
- The proposal will not result in an unacceptable environmental or local amenity impact; and
- Where possible, joint user and shared user agreements are made.

Planning permission will not be granted for development that results in the loss of learning and non-residential institutions (Use Class F.1) from a site unless it can be demonstrated that:

- There is no longer a need or foreseeable need, or there is overriding demand for an alternative use on the site that is of benefit to the local community; or
- Suitable replacement provision can be provided on-site, or within an alternative suitable location that would continue to be easily accessible to its users by walking, cycling or public transport; or
- It can be demonstrated that the use can no longer feasibly be provided in its location.

*This does not apply to academic institutions exclusively for 18+ students such as the University of Oxford and Oxford Brookes University.

PROTECTION, ALTERATION AND PROVISION OF CULTURAL VENUES AND VISITOR ATTRACTIONS

7.10 Oxford has a wide range of cultural and visitor attractions and venues ranging from large places that attract people from far and wide to more local facilities important to local communities. These venues include theatres, cinemas, pubs, museums and music venues. These venues may attract visitors from within the city and beyond, including tourists. The events held at these places are the cultural lifeblood of the city for many people and as such should be celebrated and protected.

Key things to consider when drafting the policy:

- It is important that the city's social, cultural and visitor attractions are protected as they often add a unique vibrancy to the city.

- They may also bring social benefits and provide a meeting place for different groups of people as well as providing locations for events and for showcasing the work of different artists.

- Most cultural venues and visitor attractions such as theatres, nightclubs, pubs, casinos and concert halls are classed in the planning system as 'Sui Generis', which means use cannot switch to or from them without planning permission, and proposals can all be considered on their own merits.

How the draft policy responds to these considerations:

- The criteria provide a framework to determine applications for these cultural venues and visitor attractions against.

- In some instances, there may be scope to explore opportunities to improve the operation and management of the business and this need to be demonstrated that it has been fully explored as part of the marketing expectations as set out in Appendix 7.1

Draft Policy C5 set out below is the preferred approach from the various options relating to this issue considered in option sets 013g and 013h of Background Paper 013.

DRAFT POLICY C5: PROTECTION, ALTERATION AND PROVISION OF CULTURAL VENUES AND VISITOR ATTRACTIONS

Planning permission will be granted for new cultural, social and visitor attractions that add to the cultural and social scene of the city, provided that:

- the use is located in compliance with the sequential test in Policy C1 and is appropriate to the scale and function of the centre; and
- they are realistically and easily accessible by walking, cycling or public transport for most people travelling to the site; and
- they will not cause unacceptable traffic harm or adversely affect residential amenity; and
- there is no negative cumulative impact resulting from the proposed use in relation to the number, capacity and location of other similar uses (existing or committed) in the area; and
- they are well related to any existing or proposed tourist and leisure related areas.

Applications to increase capacity, improve access and make more intensive cultural/community use of existing sites will be supported. This may include diversification of pubs or similar through the provision of short stay accommodation (which must be in accordance with draft Policy E5) on upper floors where it does not detract from the operating capabilities of the business and where it does not conflict with other policies of the Plan.

The City Council will seek to protect and retain existing cultural venues and visitor attractions. Planning permission will not be granted for the loss of existing cultural venues and visitor attractions, except in the following circumstances:

- a suitable new or improved cultural venue or visitor attraction meeting similar needs will be provided on the site or at a location equally or more accessible by walking, cycling and public transport; or:
- evidence is provided to support the application which demonstrates all the following criteria have been met:
    - there has not been wilful neglect that has resulted in the venue being unattractive to market; and
    - all reasonable efforts have been made to market the premises for its existing use, or an alternative cultural or visitor attraction use that meets similar needs (according to Appendix 7.1); and

- it is demonstrated that suitable alternative facilities exist to meet the needs of the local community that may be met by the existing facility.

TRANSPORT AND MOVEMENT IN OXFORD TO HELP CREATE A LIVEABLE CITY

7.11 An effective transport system is fundamental to the vitality and liveability of the urban area, yet movement of people and goods into and around Oxford continues to be a huge challenge. Oxford has an ongoing challenge to improve air quality and cut carbon emissions from the transport sector, as well as reducing the volume of traffic and the need for land being used for vehicular parking. An integrated approach is required to redress the balance in favour of space efficient, low emission transport modes across the area.

7.12 Oxford City Council in its capacity as the Local Planning Authority has a key role to play in ensuring development is sustainable in both design and location. As such, it seeks to work with Oxfordshire County Council, the local highways authority, to ensure that new development encourages sustainable and active travel that offers joined up travel options.

TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICING AND DELIVERY PLANS

7.13 It is important that new major development proposals seek to optimise active travel and public transport opportunities and aim to limit the increase in car journeys which would add to air pollution and congestion across the city. Key tools used to appraise and determine the transport impacts of a development proposal are transport assessments (TA), transport statements (TS) and travel plans (TP).

7.14 A TA is a comprehensive and systematic process to ensure that the transport impacts of the development are properly considered and where appropriate includes measures to help mitigate development impact. A TS is a shorter version of a TA. A TP is a package of measures tailored to the needs of an individual site and focused on reducing dependence upon the private car. TPs can also specifically address the delivery and servicing requirements of a development proposal through Delivery and Service Management Plans (DSPs) and the construction traffic associated with the development proposal through Construction Management Plans (CMPs). TPs, to be effective, need monitoring, managing and where necessary enforcing.

Key things to consider when drafting the policy:

- The requirements for the transport assessment and travel plans are set out in Oxfordshire County Council's document Implementing Decide and Provide in Transport Assessments2.

- Transport Assessments will be considered in the context of Oxfordshire County Council's Local Transport and Connectivity Plan (LTCP) and its supporting strategies including the Central Oxfordshire Travel Plan, Active Travel Strategy, Innovation Framework and Mobility Hub Strategy.

- New development proposals must all ensure the layout takes into consideration the principles set out in Oxfordshire County Council's Street Design Guide3.

- Construction Traffic Management Plans must incorporate the Construction, Logistics and Community Safety (CLOCS) standards4.

How the draft policy responds to these considerations:

- Sets thresholds for the type of development proposals that must be accompanied by a transport assessment/statement (TA/TS).

- Identifies what should be included in any TA/TS submitted in support of a development proposal

- Identifies when a Travel Plan, Delivery and Service Management Plan or a Construction Traffic Management Plan may be required to support a development proposal.

Draft Policy C6 set out below is the preferred approach from the various options relating to this issue considered in option sets 012a of Background Paper 013.

DRAFT POLICY C6: TRANSPORT ASSESSMENTS, TRAVEL PLANS AND SERVICE AND DELIVERY PLANS

Planning permission will only be granted for development proposals if the City Council is satisfied that necessary transport-related measures will be put in place.

A Transport Assessment (TA) or Transport Statement (TS) must be submitted for development that is likely to generate significant amounts of movement, in accordance with the thresholds set out in Appendix 7.2.

[2] https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport/ImplementingDecideandProvideTARequirements.pdf
[3] https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/DesignGuidePublication.pdf
[4] https://clocs.org.uk/the-clocs-standard

Transport Assessments must assess the multi-modal impacts of development proposals and demonstrate the transport measures which would be used to mitigate the development's impact to ensure:

a) there is no unacceptable impact on highway safety;
b) there is no severe residual cumulative impact on the road network;
c) pedestrian and cycle movements are prioritised, both within the scheme and within neighbouring areas;
d) access to high quality public transport is facilitated, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
e) the needs of people with disabilities and reduced mobility in relation to all modes of transport are addressed;
f) the development helps to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards as set out in the Oxfordshire County Council Street Design Guide[11];
g) the efficient delivery of goods, and access by service and emergency vehicles is allowed for; and
h) charging of plug-in and other ultra-low emission vehicles is enabled in safe, accessible and convenient locations with designated bays and priority for car clubs

A Travel Plan, which has clear objectives, targets and a monitoring and review procedure, must be submitted for development that is likely to generate significant amounts of movement in accordance with the thresholds set out in Appendix 7.3. Travel Plans must support outcomes (a) to (h) set out above.

Where a Travel Plan is required under this policy and a substantial amount of the movement is likely to be in the form of delivery, service and dispatch vehicles, a Delivery and Service Management Plan will be required.

Where a Delivery and Service Management Plan is provided this should set out how deliveries will be managed and demonstrate how impacts will be minimised including congestion, safety, noise and how zero or ultra-low emission and last mile opportunities will be considered.

A Construction Management Plan (CMP) must be submitted for development that is likely to generate significant amounts of movement during construction. This CMP must incorporate the CLOCS (Construction, Logistics and Community Safety) standards where applicable.

BICYCLE AND POWERED TWO WHEELERS PARKING

7.15 Increasing the uptake of cycling further will be an important tool in helping Oxford to achieve its ambitions of improving air quality, reducing congestion, enhancing the public realm and encouraging healthy lifestyles.

Key things to consider when drafting the policy:

- Safe, secure parking is an essential part of ensuring people feel confident to cycle.

- Oxfordshire County Council's Parking Standards for New Developments sets out the parking standards for bicycles and powered two wheelers; these parking standards reflect the need for bicycle storage as shown by research evidence.

- As well as parking facilities, changing rooms, showers and locker facilities in places of work can be important in enabling people to cycle.

- There have been cases where the level of provision for student accommodation has been too high because students living close to campus often do not feel the need to bring a bike.

How the draft policy responds to these considerations:

- The policy links to Oxfordshire County Council's Parking Standards for New Developments.

- Criteria for where the Oxfordshire County Council's Parking Standards are silent, including powered two wheeler parking for non-residential development.

- Criteria set out where a lower level of parking for student accommodation may be acceptable.

Draft Policy C7 set out below is the preferred approach from the various options relating to this issue considered in option sets 012b and 012c of Background Paper 012.

DRAFT POLICY C7: BICYCLE AND POWERED TWO WHEELERS PARKING DESIGN STANDARDS

Planning permission will only be granted for residential developments* that comply with or exceed the minimum bicycle and powered two-wheeler parking requirements as set out in Oxfordshire County Council's Parking Standards for New Developments (as shown in Appendix 7.4).

Planning permission will only be granted for non-residential developments that comply with or exceed the minimum bicycle and powered two-wheeler parking requirements as set out in Oxfordshire County Council's Parking Standards for New Developments (as shown in Appendix 7.4).

Provision of bicycle parking lower than the minimum standards may be acceptable for new student accommodation if it is:
a) located close to the institution where most of its occupants will be studying; and/or
b) where it is adequately demonstrated through a transport assessment that there is existing unused bicycle parking capacity available, in appropriate locations and of an appropriate design standard on site, to accommodate the increased number of bedrooms.

Bicycle parking should be well designed and well-located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.

Bicycle parking should be designed to accommodate an appropriate amount of parking for the needs of disabled people, bicycle trailers and cargo bicycles, as well as facilities for electric charging infrastructure to charge batteries for E bikes.

Changing room, showers and lockers should be provided at commercial/non-residential new development in accordance with the standards set out in Appendix 7.5.

* For the purposes of this policy, residential development includes C3 dwellings, C4 and Sui Generis, HMO, and all C2 development (residential institutions).

MOTOR VEHICLE PARKING DESIGN STANDARDS

7.16 Alongside the range of measures to reduce the need to travel and to encourage active travel modes, the policies in the Plan also seek to reduce the opportunities for parking across the city. Over time this will help to reduce car use leading to improvements in congestion, air quality and the environment for walking and cycling. In addition, with fewer private car trips on Oxford roads, public transport services can flow more freely further enhancing the attractiveness as an alternative to using a private car for journeys in and around the city.

Key things to consider when drafting the policy:

- Oxfordshire County Council's Parking Standards for New Developments considers parking levels in new developments.
- Oxfordshire County Council's Central Oxfordshire Travel Plan (COTP) which sets out the transport strategy for Oxford and travel connections between the city and Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley.
- Controlled Parking Zones in Oxford and the aspirations of both the City and County Councils for Controlled Parking Zones (CPZs) to cover the whole of the city during the plan period.
- Opportunities across the city for the delivery of low car residential developments.
- Whether different standards should apply for different size/ types of residential development – e.g. HMO and student developments (consideration of draft Policy H9 and Draft Policy H10)
- Whether different standards should apply for residential and non-residential developments
- Whether different standards should apply for different locations across the city

- Parking provision for pool cars/car clubs, delivery and servicing vehicles and blue badge holders.

- On and off-street parking provision for those using the city centre and district and local centres for both business and leisure (public parking).

- The implications of the 3 traffic schemes that Oxfordshire County Council is seeking to implement during the Plan period: traffic filters, expanded zero emission zone and workplace parking levy.

- The extent to which supporting evidence including Transport Assessments and Travel Plan influences parking provision.

How the draft policy responds to these considerations:

- Identifies different parking standards for residential and non-residential developments - these reflect Oxfordshire County Council's parking standards.

- Criteria set out for where low car residential developments are expected.

- For non-residential development, the starting point is to have no additional parking.

Draft Policy C8 set out below is the preferred approach from the various options relating to this issue considered in option sets 012d of Background Paper 012.

DRAFT POLICY C8: MOTOR VEHICLE PARKING DESIGN STANDARDS

Residential developments
Where the following circumstances apply, planning permission will only be granted for residential schemes* that are low car:

a) in Controlled Parking Zones (CPZs); and
b) where the site is located within a 400m walk to frequent (15-20 minute) public transport services; and
c) within 800m walk to a local supermarket or equivalent facility with a minimum floor area of 130m^2 of retail space which sells essential items such as milk, bread, pasta and fruit and vegetables

(measurements taken from the midpoint of the proposed development)

In these low car residential developments, no car parking spaces allocated to a particular housing unit are to be provided, but only a small number of shared spaces and spaces for blue badge holders, for pooled cars/car club cars, for servicing and delivery vehicles and for working drivers, for example NHS community staff. The numbers of blue badge holder spaces and servicing spaces, pooled car/car club spaces required in all residential developments is set out in Appendix 7.6

In all other locations, planning permission will only be granted where the relevant maximum standards as set out in Appendix 7.6 are not exceeded.

On large residential schemes of 100+ units, car club or pooled cars should be made available according to the standards set out in Appendix 7.6.

Parking spaces should be located to minimise the circulation of vehicles around the site and so that they are well integrated into the landscaping scheme.

Non-residential developments
In the case of all non-residential developments, the starting point is for no additional parking except for blue badge and servicing only. The Council will seek a reduction for highly accessible sites.

Any additional parking provision should be kept to the minimum necessary to ensure the successful functioning of the development, with the need being demonstrated through the submitted TP.

A comprehensive TP should be submitted that justifies proposed parking levels based on the development in the context of the whole site. This TP must take into account the objectives of this Plan to promote and achieve a shift towards sustainable modes of travel and should set out measures introduced to maximise use of sustainable transport modes and demonstrate that there will not be unacceptable impacts on the transport network. The TP will be required to be reviewed to ensure that future opportunities to encourage a shift towards public transport and active travel are taken. The requirements for a TP are set out in Appendices 7.3 of the Plan.

Parking spaces should be located to minimise the circulation of vehicles around the site and so that they are well integrated into the landscaping scheme.

*For the purposes of this policy, residential development includes C3 dwellings, C4 and Sui Generis, HMO, and all C2 development (residential institutions).

ELECTRIC VEHICLE (EV) CHARGING

7.17 Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. This covers both residential and non-residential developments with specific levels of requirements set out for each use. Policy C9 therefore seeks to ensure that chargers are well located and designed for ease of use.

Key things to consider when drafting the policy:

- Approved Document S: infrastructure for charging electric vehicles5
- Future proofing electric vehicle charging infrastructure (EVI)

[5] https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf

- Overlap with Policy HD15 Bin and Bike Stores and External Servicing Features and also with the design checklist (Appendix 1.1)

- Whether requirements should differ for residential and non-residential developments

- Parking requirements for blue badge holders/ car club parking bays

How the draft policy responds to these considerations:

- Identifies requirements for EV charging infrastructure in residential and non-residential developments.

Draft Policy C9 set out below is the preferred approach from the various options relating to this issue considered in option sets 012e of Background Paper 012.

DRAFT POLICY C9: ELECTRIC VEHICLE CHARGING

New build residential development

For each new residential development, the proposed number of EV charging infrastructure points must be a minimum of either the number of parking spaces or the number of dwellings the parking serves.

When off plot parking is proposed within a new residential development it should incorporate electric vehicle charging infrastructure to enable the charging of electric vehicles on the street in accordance with the Oxfordshire County Council Street Design Guidance.

All new blue badge parking bays and all car club parking bays must provide access to live electric vehicle charging infrastructure that is ready for use.

New build non-residential development

In all non-residential development at least 10% of the car parking spaces should have EV charging infrastructure.

All new blue badge parking bays and all car club parking bays must provide access to live electric vehicle charging infrastructure that is ready for use.

Implementation of electric vehicle charging infrastructure

The location of charging points in development proposals should allow for easy and convenient access to the charge point from the relevant parking space and avoid negative impacts.

Both the charging point and electric infrastructure and cabling should be designed and located so that it can be maintained as required. It should be live and ready for use.

CHAPTER EIGHT INFRASTRUCTURE AND NEW DEVELOPMENT

INTRODUCTION

8.1 Provision of infrastructure will need to be funded and delivered in a timely manner to support development and deliver upon the Local Plan vision for 2042, the spatial strategy and plan objectives. The draft policy S3 as set out in Chapter 1 addresses the overarching requirements for infrastructure delivery and new development, including how the Council will seek to ensure contributions are provided towards meeting key infrastructure needs. Additionally, however, the provision of digital infrastructure is an important consideration that applicants will need to factor into their proposals.

DIGITAL INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENT

8.2 Digital infrastructure is playing an increasingly important role in our day-to-day lives, supporting people to meet various needs, as well as the wider economy and the services businesses provide. It is important that this type of infrastructure is factored into the design of new development as with any other type of infrastructure.

8.3 Key considerations for the policy:

- Connections have been improving greatly in Oxford over the last ten years. Developers are encouraged to engage early with a range of network operators, to ensure that development proposals are designed to be capable of providing this level of connectivity to all end users.

- Oxford at present is broadly covered by mobile networks, but access to the newer 5G network, which can offer more reliable connections in busier places and for higher intensity data transfer, is still limited.

- Data centres can play an important role in a successful modern economy.

8.4 How the draft policy responds to these considerations:

- Requires new development to ensure it is serviced by appropriate digital infrastructure.

- Provides support for data centres in appropriate locations.

Table 8.2: Policy options set 014b: Digital Infrastructure to support New Development

Draft Policy I1 is the identified preferred approach from the various options relating to this issue. It is considered within the four options set 014a of Background Paper 014

DRAFT POLICY I1 DIGITAL INFRASTRUCTURE TO SUPPORT NEW DEVELOPMENT

Development proposals should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

Development proposals should:

a) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users;
b) meet expected demand for mobile connectivity generated by the development;
c) take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and providing mitigation if that is unavoidable;
d) where required support the effective use of buildings, outdoor spaces and the public realm to accommodate well-designed and suitably located mobile digital infrastructure;
minimise impacts of digital infrastructure. on the visual amenity, appearance and character of buildings and surrounding areas, and minimise impacts on the amenity of occupiers and neighbours of development.

Data centres play an important role in supporting a modern economy. New, expanded or upgraded data centres will be supported on suitable sites in appropriate locations in accordance with other policies of the development plan.

AREAS OF FOCUS

8.5 Traditional Local Plans have policies only at individual site level, which means that cumulative impacts can be overlooked. As such, we propose identifying several ‘Areas of Focus’ across the city which we have defined as areas where changes are anticipated over the Plan period resulting from new development. The Areas of Focus will each include an overarching policy. Areas of Focus policies will include some key development principles specific to that area. Each Area of Focus will also contain a number of site specific allocations.

8.6 The benefit of identifying the broader Areas of Focus in addition to site allocations is that, as development sites come forward, they can be determined against some key policy principles relevant to that area and thus can be considered in the wider context of the area and the other potential developments. Where these cumulative impacts are overlooked, they can have a detrimental impact on place making, design and infrastructure provision, which we are seeking to minimise through this approach. Policies that apply across defined Areas of Focus will help ensure the approach to movement and connectivity, enhancing and creating high quality public realm and open space can be considered more strategically.

8.7 We have grouped the areas of focus within each of the four IDP quadrants as follows:

8.8 North Area quadrant of city

- The Northern Edge of Oxford Area of Focus

South Area quadrant of city –

- Cowley Branch Line, Littlemore and Leys Area of Focus

East Area quadrant of city –

- Marston Road and Old Road Area of Focus

West and Central Area quadrant of city

- West End and Botley Road Areas of Focus

NORTHERN EDGE OF OXFORD AREA OF FOCUS

8.9 This area is adjacent to urban extension sites in Cherwell District Council.

8.10 Reasons for identifying this Area of Focus are:

- The development of the urban extensions surrounding the city, must be well integrated with the city in terms of improved pedestrian, cycling and public transport connectivity.

- There are opportunities reduce and rationalise public and workplace car parking to optimise the most efficient use of land.

- Generally low density suburban development therefore has potential for intensification

- Severance by some key routes and junctions best addressed by area-wide approach

- Lack of connections with adjoining area outside city (in Cherwell District) that development should take the opportunity to improve

- Limited open space in west of the area and opportunities can be taken to increase public access to green spaces •

- Area close to the SSSI at Port Meadow which is sensitive to air quality and recreational impacts that need to be addressed by a holistic approach.

COWLEY BRANCH LINE, LITTLEMORE AND THE LEYS AREA OF FOCUS

8.11 This Area of Focus includes the area around the Kassam Stadium, and the proposed Cowley Branch Line (CBL) where several of the city's key employment sites lie, including the large employers of MINI Plant Oxford, Oxford Science and Oxford Business Park.

8.12 Reasons for identifying this Area of Focus are:

- There is currently severance by some key routes and junctions, areas of poor air quality and of poor connectivity
- There will be significant opportunities for improving and enhancing connectivity to this part of the city by modes other than by private car.
- The opening up of passenger services along the Cowley Branch Line will provide a welcome public transport alternative for this area of the city.
- Two stations are proposed along the line at Oxford Science Park and in the vicinity of Oxford Business Park/Oxford Retail Park.
- This area will experience considerable change over the Plan period as developments on the edge of the city in adjoining South Oxfordshire are built out as allocated strategic sites, particularly the Land South of Grenoble Road (Policy STRAT 11) and Land at Northfield (Policy STRAT 12)16.
- There are significant regeneration opportunities throughout the area and potential for high density developments, supported by public transport improvements.
- The public transport improvements and ambitions for better use of land also give the opportunity to seek a reduction in car parking across the area •
- Consideration across the whole area enhances the ability to design higher density developments effectively, considering impacts of heights for example, and the best way across the area to increase access to green spaces.
- Ensure good urban design and place making opportunities are taken
- Increase opportunities to enhance existing tree cover which is the lowest canopy cover across the city •

MARSTON ROAD AND OLD ROAD AREAS OF FOCUS

8.13 This Area of Focus extends from the southwest part of Marston Road, incorporating Oxford Brookes and the Old Road Campus and the hospital sites. Range of uses including educational, residential, research and hospital.

8.14 Reasons for identifying this Area of Focus are:

- The area around this part of the Marston Road includes some underutilised sites with development potential.
- It is a sensitive area because of proximity to important parks, proximity to the River Cherwell and several listed buildings.
- There are some significant archaeological sites within this area including Civil War defences and the Fairfax siege line.
- The area has an attractive and important natural setting and there are important views both into and out of the historic core of Oxford.
- recognises the need for this development to be well linked to the city in terms of both design and connectivity across the ring road.
- New development offers the opportunity to ensure good connectivity by foot and cycle and public transport across the area, e.g. with safe, attractive routes, and to manage parking on the hospital sites.

UNIVERSITY AREAS NORTH OF THE CITY CENTRE AREA OF FOCUS

8.15 The area to the north of the city centre is dominated by several University of Oxford buildings of a wide range of styles, ages and sizes.

8.16 Reasons for identifying this Area of Focus are:

- As many sites are controlled by one landowner there is more scope to ensure that new development and redeveloped buildings relate well to one another to create a better urban form and public realm.
- Opportunities should be taken to improve the permeability of this area and the use of some of the institutional buildings at ground level where achievable to bring a wider range of people into the area.

- The interface with University Parks is important and needs consideration beyond individual site areas

- There is often a lack of definition between public and private space, which could be improved, for example some routes are public but not obviously so, exacerbated by servicing features of the science buildings such as delivery areas, chemical storage tanks, vents and extractors

- There is currently little public use of the institutional buildings but this could improve

- The area is sensitive as it includes and is in the setting of significant heritage assets (e.g. Central Conservation Area, Radcliffe Observatory, North Oxford Victorian Suburbs, Jericho and Walton Manor Conservation Areas and University Parks) Impacts of heights on views, including from University Parks an important consideration and roofscape, including the impacts of planting

- Many buildings individually of very high quality, although they do not always relate well to each other or their surroundings

WEST END AND BOTLEY ROAD AREA OF FOCUS

8.17 This area of focus includes several key West End sites, extends across the river to include Osney Mead and extends along the Botley Road to the retail park area. Most of this area is covered by the West End and Osney Mead Supplementary Planning Document (SPD) Area contains a wide variety of buildings and uses including brownfield land, commercial premises

8.18 Key area of public transport provision for rail and bus, and Seacourt Park & Ride along the Botley Road

8.19 Reasons for identifying this Area of Focus are:

- This area offers some significant development and regeneration opportunities but for them to be fully realised there are some key infrastructure priorities.

- The SPD seeks to ensure that development in the area is brought forward in a coordinated way that contributes to the wider vision for the area.

- The Area of Focus incorporates the Botley Road retail park as there are several changes happening there in a piecemeal way.

- There are areas of high flood risk within this area of focus and OFAS will be near to The retail park currently is a car dominated area and a difficult environment to navigate on both foot or bicycle, so there is significant potential for improvement

- There is a significant opportunity to create high-density urban living with good provision and access to open space and a vibrant mix of uses, and also that make a significant contribute to the knowledge economy

- There is potential for enhance public realm, particularly around the waterways and enhanced accessibility and permeability of the area through good pedestrian and cycle links. •

- The redevelopment of Oxford railway station presents the opportunity to create an easy and attractive transport interchange between rail, bus and active travel

- Careful consideration of heights of buildings is need as this area is sensitive in terms of views into and out of the historic core.

PROPOSED DEVELOPMENT SITE ALLOCATIONS

8.20 A site allocation is a planning policy that describes what types of land use, or mix of uses, would be acceptable on a specific site, or protects the site for certain types of development. Many sites will come forward without ever having been identified or having a site allocation policy, and the generic policies of the plan should provide a sufficient framework for assessing applications for these sites. However, site allocation policies give guidance and certainty to developer and landowners, and they help local people understand what my happen in their neighbourhood in the future.

8.21 The Strategic Housing Land Availability Assessment and the Economic Land Needs Assessment identify sites and their capacities. Not all of the sites identified will be taken forward for a site allocation, if there is little need for further guidance because they have little opportunity for net gain and there is no proposal to change their use.

8.22 Sites have been identified from a range of sources, including:

- Previously allocated sites in the Oxford Local Plan 2036 and any additional sites that were being considered in the Oxford Local Plan 2040

- Further sites submitted to the Oxford Local Plan 2040 Examination

- Sites in historic planning policy documents such as the West End AAP and Sites and Housing Plan

- Call for sites inviting landowners and others to nominate sites

- Employment sites
- Green spaces (filtered out for further investigation if they are part of the identified core infrastructure network)
- Commitments (sites with planning permission or Prior Approval for housing)
- Sites refused planning permission or expired but potentially suitable for development
- Desk-based map survey.

8.23 Many sites were filtered out for further consideration for a variety of reasons, including lack of known landowner interest or because proposed uses would be contrary to the strategy of the plan.

CURRENTLY ALLOCATED SITES (ADOPTED LOCAL PLAN 2036)

8.24 The Oxford Local Plan 2036 includes a suite of site allocation policies. Some of these have already been developed, or development is underway. Of the remaining sites, continued landowner interest has been checked. A further process of assessing the sites and landowner intentions against the emerging strategy of the Oxford Local Plan 2042, as well as any other relevant changes of context, will be followed before the site allocation policies are developed ready for the next stage of consultation.

SHLAA Ref. Number	**Site Name**	**Suitable uses- based on existing site allocation policies and known and checked landowner intentions and existing lawful uses, still compliant with local plan strategy**
11	Canalside Land, Jericho	Housing-led
12	Churchill Hospital	Suitable for a wide range of uses, although the principal use will remain as hospital use.
14	Templars Square (formerly Cowley Centre, Between Towns Road (includes Templars Square shopping centre))	Suitable for a mix of uses, including retail, residential, community and commercial uses.
16	Cowley Marsh Depot, Marsh Road	Housing site
17	Crescent Hall	Housing site
18	Diamond Place and Ewert House	Suitable for a mix of uses, including retail, residential, community and commercial uses.

21	Faculty of Music, St Aldate's	Housing (student)
24	Government Buildings and Harcourt House (023 + 024)	Residential-led (student) development with replacement employment use.
26	Jesus College Sports Ground (Herbert Close)	Housing site
27	John Radcliffe Hospital	Suitable for a wide range of uses, although the principal use will remain as hospital use.
31	Manor Place	Housing (student)
49	Oxford University Press Sports Ground, Jordan Hill	Housing site
54	Ruskin College Campus	Housing site
61	Union Street Car Park and 159–161 Cowley Road (formerly Union Street Car Park)	Housing site
62	University of Oxford Science Area & Keble Road Triangle	Employment site
63	Warneford Hospital	Suitable for a mix of uses according to landowner intention to redevelop the hospital, increase research and development provision on the site and provide residential accommodation.
65	West Wellington Square	Housing (student)
70	Island Site (Park End Street/Hythe Bridge Street)	Suitable for a mix of uses, including retail, residential, community and commercial uses.
76	Oxpens	Suitable for a mix of uses, including retail, residential, community and commercial uses.
81	Worcester Street Car Park	Housing site
104	Former Iffley Mead Playing Field	Housing site
111	Oxford Stadium (greyhound stadium)	Housing-led development
113	Redbridge Paddock (land east of Redbridge Park and Ride) (formerly Green Belt land east of Redbridge Park and Ride)	Housing site
117	Land surrounding St Clement's Church	Housing site
120	Unipart	Employment site
124	Slade House	Housing site
173	Bayards Hill Primary School Part Playing Fields	Housing site
289	Sandy Lane Recreation Ground	Housing site
389	Land at Meadow Lane	Housing site
440	1 Pullens Lane	Housing site

467	Edge of Playing Fields, Oxford Academy	Housing site
497	MINI Plant Oxford	Employment site
574	Manzil Way Resource Centre	Housing site
579	ROQ Site	Academic-led development
586	Osney Mead (whole site)	Suitable for a mix of uses including retail, community and commercial uses.
587	ARC Oxford (formerly Oxford Business Park)	Employment site
588	Oxford Science Park	Employment site
624	Land south of Frideswide Square	Suitable for a mix of uses including retail, community and commercial uses.
006b	Banbury Road University Sites - Parcel B (formerly part of 006 Banbury Road University Sites)	Housing (student)
008a	Bertie Place Recreation Ground	Housing site
075 (a and b)	Oxford Railway Station and Becket Street Car Park	Suitable for a mix of uses, including retail, residential, community and commercial uses.
1a1	Northern Gateway (Oxford North)	Suitable for a mix of uses
1e	Pear Tree Farm	Housing site
28a, 28c	Kassam Stadium, Ozone Leisure Complex and Minchery Farmhouse	Suitable for a mix of uses, including retail, residential, community and commercial uses. 28c not currently part of the Oxford Local Plan 2036 allocation.
28b	Overflow carpark at Kassam Stadium site (formerly within #28)	Housing site
32, 234	Lincoln College and Jesus College Sports Grounds	Housing site
38a2	Thornhill Park (wider site) (formerly known as Nielsen House, London Road site #38)	Suitable for residential and replacement commercial uses.
42	Nuffield Orthopaedic Centre	Suitable for a wide range of uses, although the principal use will remain as hospital use.
439	Marston Road Campus	Suitable for continued academic use that may also include student accommodation, or a housing site.

PROPOSED NEW SITE ALLOCATIONS

8.25 In addition to sites in the Oxford Local Plan 2036, a number of potential new sites that may benefit from a site allocation policy have been identified. These sites need further investigation to assess their suitability for the proposed development.

SHLAA Reference Number	**Site name**	**Use proposed by landowner (or noted from planning application)**
20b2	Myers Briggs, Elsfield Hall, Elsfield Way	Landowner proposes site for conversion from office to residential accommodation
33	Littlemore Mental Health Centre, Sandford Road	Landowner intends to keep site in existing uses (hospital and staff/student accommodation), but with potential for intensification to introduce some employer-linked housing.
43	Old Road Campus	Landowner has put forward the site as having some potential for further intensification over the plan period. Landownerconfirmed retaining for employment use only.
204	East Oxford Bowls Club	Landowner has proposed for residential development.
428	Rectory Centre	The landowner has put forward for residential development, subject to consolidating health use onto alternative sites
463	Ruskin Field	There is a site allocation for housing on part of Ruskin Field. The larger area of the field to the north has been put forward for development by the landowner. The northern part of the field has potentially better access than the allocated site. However, it is potentially more sensitive in terms of the heritage setting of the Old Headington Conservation Area. There is also potential for peat reserves on the site. Further investigation of the site is needed.
516	474 Cowley Road (Former Powell's Timber Yard)	Expired permission for residential care home.
613-615	Botley Road sites around Cropley Road including River Hotel and Westgate Hotel	Landowner has proposed for residential with potentially retail at ground level. Would mean loss of hotel uses, but potential in-line with strategy.
616	St Thomas School and Osney Warehouse	Mixed-use site. Some heritage interest that needs further investigation before drafting a site allocation policy.

639 & 204	Oriel College Sports Ground, Bartlemas and former Bowling Green	Landowner has proposed this site for housing. The site forms an important part of the setting of the Bartlemas Conservation Area. Further investigation of whether there is any development potential is needed before the next stage of consultation.
657	Clarendon centre	Planning permission for mix of uses (retail, offices, R&D, and student accommodation) suitable for the city centre location.
658	Barton 3b (Land to the rear of Harolde Close, previously included in the Barton Area Action Plan area and outline application)	Landowner proposed for housing. This site was within the now expired Barton AAP area and was included in the outline permission, but it would need permission for development, so is being considered for a specific allocation in the Local Plan 2042.
660	2 Harberton Mead	Currently student accommodation in a conversion. Landowner proposed site for residential use- general residential use or intensification of student accommodation.
664	Jowett Walk (South)	Proposed by landowner for student accommodation (currently house, garden, car parking)

GREEN BELT AREA OF SEARCH

8.26 In addition to the above sites, we are also required to look at Green Belt. The NPPF is very clear that, where there is unmet need, sites within the Green Belt should be considered in order to help address this need (paragraph 146).

8.27 There are parts of the Green Belt which are intrinsically undevelopable, and footnote 7 of the NPPF makes this clear- in Oxford, we have ruled out for any further consideration the Oxford Meadows Special Area of Conservation (SAC, Port Meadow), SSSIs and functional floodplain (greenfield flood zone 3b). For assessment purposes, Oxford's Green Belt has been divided into parcels, and of these 101 parcels, 61 are ruled out for any further consideration.

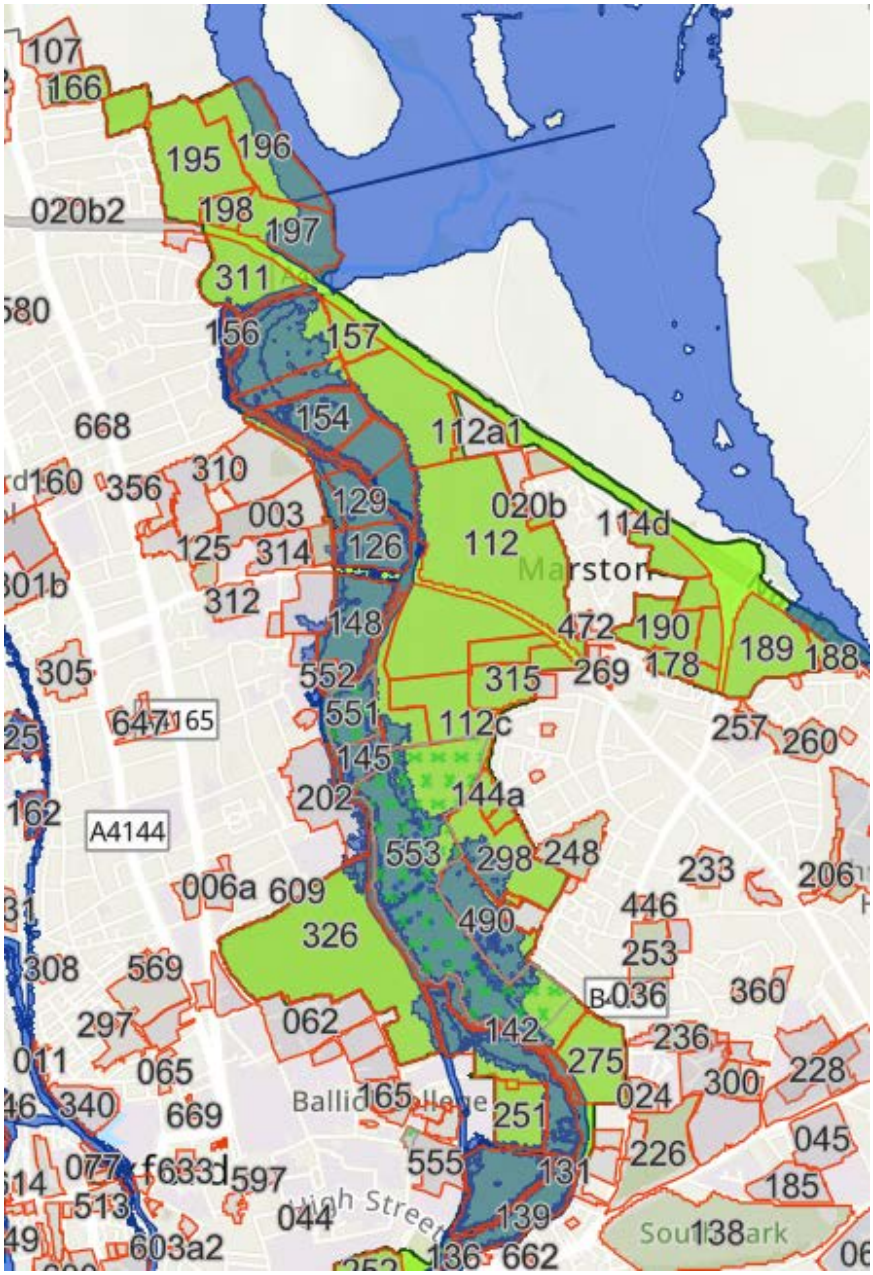
8.28 The remaining parcels have been assessed in the Green Belt Assessment (LUC, 2025) to determine their Green Belt function; in many cases these are sites that had been assessed previously and the assessment has merely needed an update, but some additional sites were also added to the assessment.

8.29 Parcels assessed for their Green Belt potential at this stage will be subject to many other assessments and considerations before we move to the next stage of the local plan. Aside from Green Belt, important considerations will include whether

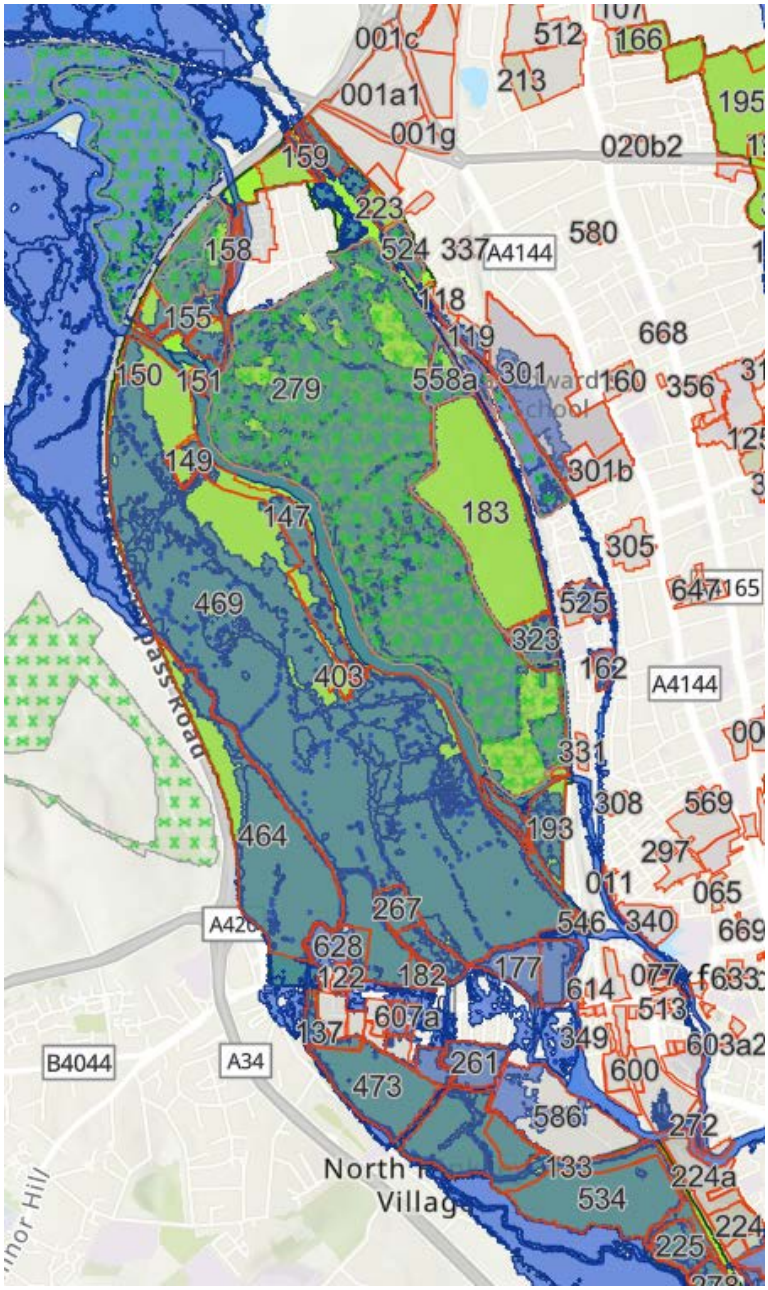
there is landowner interest, access issues, the use of the site (e.g. whether there are sports pitches that can't be moved and need protection) and biodiversity. Sites where development would be contrary to the strategy of the plan will still be protected, for example those in the defined Core Geen Infrastructure network and those with local wildlife protections (OCWS, LWS). However, they are included in the scope for the Green Belt Assessment.

8.30 The following maps show the Green Belt within the city (in bright green) overlain with functional flood plain (dark blue) and SSSIs and the SAC (shown with green crosses). The visible bright green areas are the only areas of Green Belt in scope for the Green Belt Assessment. The numbers in the red parcels correspond with the numbers in the Green Belt Assessment (LUC 2025). The purpose of that assessment is to assess how well these parcels perform against the purposes of the Green Belt (set out in the NPPF). It is reiterated that at this stage the parcels are being assessed for their Green Belt function, and once that is understood the next step is to consider whether any may be a suitable development site, or if development would be contrary to the plan strategy or otherwise unfeasible.

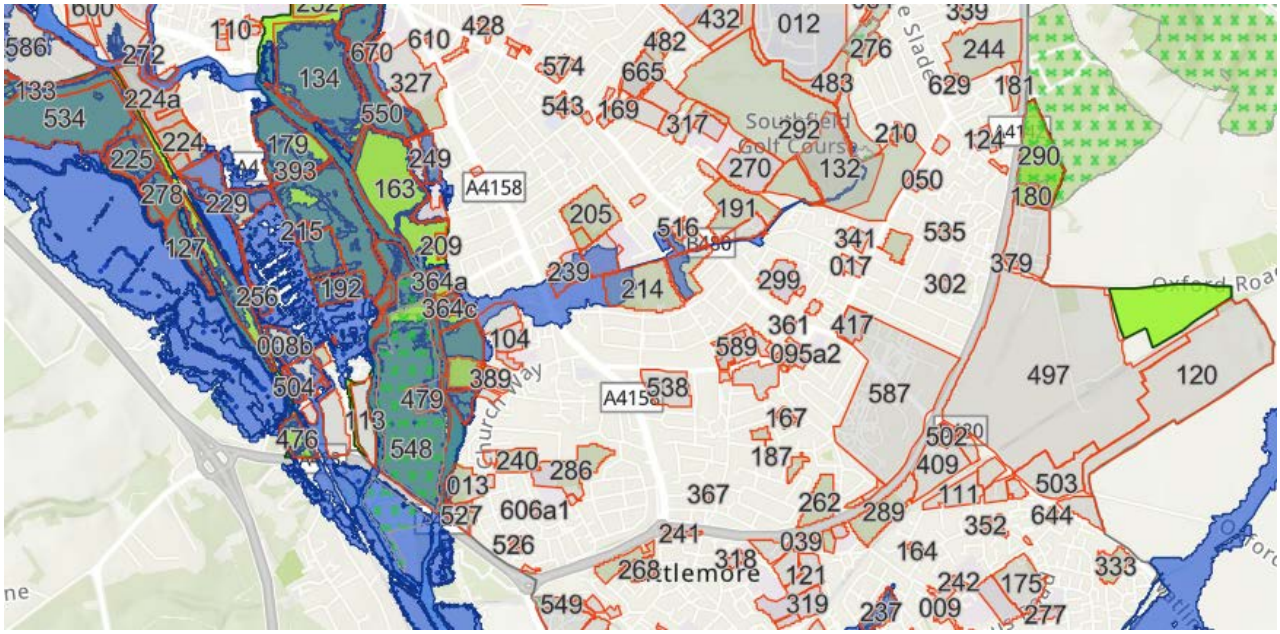
8.31 North eastern area of Green Belt



8.1 North western area of Green Belt



8.32 Southern area of Green Belt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Southfield
Golf Course
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Term	Definition
Active travel	Refers to modes of travel that involve a level of activity. Central Oxfordshire Travel Plan (COTP) – This plan sets out the transport strategy for Oxford and travel connections between the city and Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley
Affordable Housing	Affordable housing – This comprises of Social Rent, Affordable Rented, and intermediate housing (with varying levels of ownership of the home) provided to eligible households whose needs are not met by the open market. The high property and rental values in Oxford are so extreme that many of the models for affordable housing do not achieve genuine affordability for people looking to rent or buy in Oxford. The most recent Tenancy Strategy will be used to assess whether proposed forms of affordable housing are genuinely affordable in Oxford. Affordable housing will also comply with one or more of the following definitions: **a) Affordable housing for rent:** meets all of the following conditions: i) the rent is set in accordance with the Government's rent policy for Social Rent (see separate definition) or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); ii) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider except for any social rented element of the scheme. This may also include employer-linked housing); and iii) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent). **b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute at the time of plan-preparation or decision-making. Income restrictions should be used to limit a household's eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London). **c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. **d) Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant

	authority specified in the funding agreement. Campus sites of the colleges of the University of Oxford and of Oxford Brookes University - These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing.
Affordable workspace	Workspace that overcomes a market failure and is delivered to support certain social, or cultural or economic purposes including: - Sectors that have social value such as charities, voluntary and community organisations or social enterprises; - Sectors that have cultural value such as creative and artists' workspaces, rehearsal and performance space and makerspace; and - Supporting start-up and early-stage businesses or regeneration. Affordable workspaces should be provided using a discounted or "alternative" rent model, and/ or by providing suitable premises to meet end-user requirements (i.e., through the provision of a specific use class).
Affordable workspace strategy	A strategy which sets out the details of the affordable workspace to be delivered on site which will include details of the size, marketing, servicing, management and how the space provided will meet end-user requirements.
Arterial road	The principal routes for the movement of people and goods within the city. Arterial roads in Oxford include Botley Road and Iffley Road among many others
Biodiversity	A collective term for the variety of wildlife and flora that are present in a particular area. More species and greater variety is generally reflective of higher biodiversity, this can be important for ensuring greater resilience to pressures such as climate change and pollution
Biodiversity net gain	Biodiversity net gain is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development

Built environment	Refers to aspects of our surroundings that are built by humans, that is, distinguished from the natural environment. It includes not only buildings, but the human-made spaces between buildings, such as parks, and the infrastructure
Campus sites of the colleges of the University of Oxford and of Oxford Brookes University	These are sites with academic accommodation existing at the time of the adoption of the Local Plan, and where academic institutional use would remain on the site, even with the development of some employer-linked housing
Circular Economy	Unlike traditional linear economy whereby materials and products are created, used and then thrown away, a circular economy promotes conservation of energy, reduction in waste and extending the lifetime of products through various means such as sharing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible
Climate Change Adaption	A process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities
Climate Change mitigation	Actions to reduce the impact of human activity on the climate system. Entails interventions to reduce the emission of greenhouse gases like carbon dioxide, or to increase their storage within 'sinks' (adapted from IPCC)
Conservation areas	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance
Construction, Logistics and Community Safety (CLOCS)	A set of requirements for construction vehicles and construction traffic operations designed to eliminate collisions with vulnerable road users and mitigate the negative community and environmental impacts of construction traffic
Contaminated Land	Where substances are causing or could cause: significant harm to people; property or protected species, significant pollution of surface waters (for example lakes and rivers); or groundwater or harm to people as a result of radioactivity.
Critical infrastructure	Facilities, systems, sites, information, people, networks and processes, necessary for a country to function and upon which daily life depends
DEFRA biodiversity metric	The biodiversity metric is a habitat based approach used to assess an area's value to wildlife. The metric uses habitat features to calculate a biodiversity value. Use of the metric is required to demonstrate net gain requirements in line with the Environment Act legislation
Demographic	The measures (such as age, gender and income) of a specific group of people.
District centres	District centres comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library

Ecological buffer zone	A primarily undeveloped area of land adjacent to the watercourse which is designed to secure benefits for nature and people, whilst also forming a natural buffer to the waterfront.
Ecological network	This is one component of the overall green infrastructure network and where the term is used in the Local Plan, this specifically relates to the collection of spaces in the city which play a particularly vital role in supporting ecology and have been designated for this primary purpose
Ecosystem services	The direct and indirect goods and services that nature contributes to our health and wellbeing, including benefits like food production, water quality, regulation of floods, resilience to soil erosion, as well as more intangible benefits like stress reduction and contributing to our sense of place and character of the city
Embodied Carbon	The carbon dioxide in producing materials, including the energy used to extract and transport raw materials as well as emissions from manufacturing processes. The embodied carbon of a building can include all of the emissions from the construction process and materials used throughout; as well as from deconstructing and disposing of it at the end of its lifetime (adapted from UCL fact sheet)
Employer-linked affordable housing	Housing that is provided on specified sites by key employers in the city for staff carrying out their work. The housing should be rented at levels that are affordable to a cross-section of the key employer's employees, and should be available at Affordable Rent levels in perpetuity.
Employment generating uses	The traditional employment generating uses are those sectors that are likely to generate requirements for office, research and development, industrial and warehouse space (I.e, referred to in planning terms as 'employment floorspace or land')
Existing university or college campus or academic site	An existing university or college campus or academic site is one that exists at the time the Plan is adopted
Flood zones	Areas with different probabilities of flooding as set out in the Planning Practice Guidance: Flood Risk and Coastal Change: Zone 1 (low probability) - Land having a less than 0.1% annual probability of river or sea flooding. Zone 2 (medium probability) - Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding. Zone 3a (high probability) - Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea. Zone 3b (the functional floodplain) - Land where water from rivers or the sea has to flow or be stored in times of flood. This is land that is designed to flood.
Frequent bus service	Every 15/20 mins in both directions.
Green infrastructure	A network of spaces and features including parks, playing fields, woodland, allotments, private gardens, green roofs and walls, street trees. The term also incorporates 'blue infrastructure' such as streams, ponds, canals, and the rivers
Gross Value Added (GVA)	This measures the contribution to an economy of an individual producer, industry, sector or region. It is used in the calculation of gross domestic product (GDP). GDP is commonly estimated using one of three theoretical approaches: production, income or expenditure. When using production or income approaches, the contribution to an

	economy of a particular industry or sector is measured using GVA
Heritage assessment	May also be referred to as a Heritage Statement or Heritage Impact Assessment (HIA). This should set out the significance of a heritage asset or landscape within its wider setting and outline the proposal, assess the impact on significance and set out a mitigation strategy. The local Historic Environment Record should be consulted, and expert assessment will be required. It should have a level of detail appropriate to enable an informed decision to be reached
Heritage assets	A building, monument, site, place, area, or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by Oxford City Council during the process of decision-making or through the plan-making process (including local listing)
Historic core	area of the city centre comprising the spires and towers that make up the historic skyline, and in which any additions of height will intrude directly into the view of the skyline.
Housing and Economic Land Availability Assessment	A strategic assessment reviewing the supply of potential sites and their capacity to meet future needs for housing, and for economic growth.
Housing Delivery Test	A check run by the Government to check whether the level of housing delivery in each planning authority is meeting the housing requirement set out in the local plan
Housing in Multiple Occupation (HMO)	A house, flat or building will be a house in multiple occupation (HMO) if it meets the definition under the Housing Act 2004 s254 or s257. A HMO is usually a house or flat that is shared by 3 or more people, who are unrelated, form more than 1 household and is their only main residence. There are 2 types of HMO: C4 HMO, and sui generis HMO. A C4 HMO is a small house or flat that is occupied by 3-5 unrelated people who share basic amenities such as the bathroom and/or kitchen. A sui Generis HMO is the same as a normal C4 HMO except that it is a large house or flat occupied by 6 or more unrelated people and can be subject to slightly different planning rules.
Housing Need	Housing need is an unconstrained assessment of the number of homes needed in an area (DLUHC).
Housing target/requirement	The number of homes set out to be delivered in the plan period to 2040, also expressed as an annual requirement. In the case of Oxford this number reflects the capacity rather than the need, as the need is greater than can be met
Inclusive economy	An Inclusive Economy is defined in Oxford's Economic Strategy 2022-32 as "growing prosperity that reduces inequality and is sustainable" (Plymouth Inclusive Growth Group). An Inclusive Economy offers a genuine progressive conceptual frame in which greater consideration is given to social benefits that flow from, and feed into, economic activity. (Centre for Local Economic Strategies)
Infrastructure Development Plan (IDP)	The IDP assesses the potential risks of infrastructure not being delivered in a timely manner to support development
Intermediate housing	Housing at prices and rents above those of Social Rent, but below market or affordable housing prices or rents. These can include shared equity (shared ownership and equity loans), intermediate rent and other low cost homes. The

	Council will consider the suitability of other forms of intermediate housing, such as low-cost market housing, in light of its genuine affordability to those in housing need. NB: Key worker housing is defined separately from intermediate affordable housing
Key worker	The broad definition of key worker is someone employed in a frontline role delivering an essential public service where there have been recruitment and retention problems. In Oxford, a key worker is any person who is in paid employment solely within one or more of the following occupations: i) NHS: all clinical staff except doctors and dentists; ii) Schools: qualified teachers in any Local Education Authority school or sixth form college, or any state-funded Academy or Free School; qualified nursery nurses in any Oxfordshire County Council nursery school; Universities and colleges: lecturers at further education colleges; lecturers, academic research staff and laboratory technicians at Oxford Brookes University or any college or faculty within the University of Oxford; iii) Police & probation: police officers and community support officers; probation service officers (and other operational staff who work directly with offenders); prison officers including operational support; v) Local authorities & Government agencies: those providing a statutory service, including but not limited to social workers; occupational therapists; educational psychologists; speech and language therapists; rehabilitation officers; planning officers; environmental health officers; clinical staff; uniformed fire and rescue staff below principal level Ministry of Defence: servicemen and servicewomen in the Navy, Army or Air Force; clinical staff (with the exception of doctors and dentists); and vi)Unregistered Workforce (Support Workers): In Health roles may include: Assistant Practitioner, Care Assistant, Healthcare Support Worker, Maternity Support Worker, Nursing Assistant, Occupational Therapy Assistant, Physiotherapy Assistant, Radiography Assistant, Speech and Language Therapy Assistant, Senior Care Assistant. In Adult Social Care roles may include: Activities worker, Day Care Assistant, Day Care Officer, Domiciliary care worker, Home care worker, Nursing Assistant (in a nursing home or a hospice), Personal Assistants, Reablement Assistant, Residential Care Worker, Senior Home Care Worker, Support Worker.
Listed Building	A building deemed to be of special architectural or historical interest is placed on a statutory list maintained by Historic England. Such buildings cannot be demolished, extended, or altered without special permission from a local planning authority, which typically consults with Historic England before determining an application. The designation regime is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 Listed buildings are classified into three grades: Grade I buildings are of exceptional interest Grade II* buildings are particularly important buildings of more than special interest Grade II buildings are of special interest warranting every effort to preserve them
Listed building consent	permission required from a local planning authority before making changes that affect the character or appearance of a listed building
Liveable city	Where essential needs can be met locally such as food, open spaces, cultural activities, community needs

Liveable neighbourhoods	A neighbourhood where local residents can reach facilities such as samll shops, post office, primary school within a 15- 20 minute walk
Local centres	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. Small parades of shops of purely neighbourhood significance are not classified as local centres
Local connection (for intermediate housing)	The applicant is currently resident in the local area and has been for a continuous period of at least 12 months, or the applicant is currently employed in Oxford and has been for at least the previous six months, or the applicant has close family members (parents or adult children) who have lived in the area for at least 5 years.
Main Town Centre Uses	The National Planning Policy Framework (NPPF) defines main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)
Market housing	Housing provided by the private sector with no intervention from public bodies and sold or rented via the private market
Micro-renewables	Small-scale non-commercial renewable energy installations such as a domestic solar panel array
Mobility hubs	An area in which a variety of transport modes and community assets are co-located for seamless interchange. These facilities provide added benefit to communities and combined they make up an easy-to-use transport network
Multi-functional	In the context of green infrastructure, the term multi-functional means the multiple benefits that features and spaces can provide simultaneously, often contributing to better health and wellbeing for people and the natural environment (e.g. supporting mental/physical health; providing space for biodiversity; climate resilience etc). Some types of GI may provide more benefits than others
Native planting	A native plant is one that has evolved naturally in its location without direct human intervention, as opposed to species that have not existed historically in an area but are introduced by human activities
Net zero carbon	A situation where any emissions of carbon dioxide are balanced out by removal elsewhere – equating to no net increase (adapted from IPCC)
Oxford Heritage Assets Register	A register of buildings, structures, features, or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest

Oxford Living Wage	The Oxford Living Wage is an hourly minimum pay that promotes liveable earnings for all workers and recognises the high cost of living in Oxford. For 2023-24 the rate is £11.35 per hour
Oxford Short Stay Accommodation Study	A study that provides a summary of findings with an analysis of the impact on the development of policies which will influence both the existing stock of short stay accommodation as well as the amount and type of future provision to meet future forecasted demand
Parking Standards for New Developments	A document produced by Oxfordshire County Council used to help determine the level of parking at new developments
Planning Practice Guidance	A web-based resource that brings together national planning practice guidance for England
Principal elevation	In most cases the principal elevation will be that part of the house that fronts (directly or at an angle) the main highway serving the house (the main highway will be the one that sets the postcode for the house concerned). It will usually contain the main architectural features such as main bay windows or a porch serving the main entrance to the house. Usually, but not exclusively, the principal elevation will be what is understood to be the front of the house. Where there are two elevations that may have the character of a pincipal elevation, for example on a corner plot, a view will need to be taken as to which of these forms the principal elevation
Registered Parks and Gardens	Registered Parks and Gardens are designed landscapes, such as parks and gardens, that have been identified as being of special historic interest. Each registered park and garden is listed on the National Heritage List for England (NHLE).
Renewable energy	Energy that uses technologies which generally rely on the elements (e.g. sunlight, wind, rain), biomass, or on generating energy from the earth itself
Residual risk	Residual risk is the risk that remains after efforts to identify and eliminate some or all types of risk have been made
Resilience	Our ability to anticipate, absorb, accommodate, or recover from the effects of a hazardous event in a timely and efficient manner. When talking about climate resilience such events could include flash flooding or intense heatwave events
Retro-fitting	In the context of this chapter, retro-fitting describes improvement works to an existing building for the purpose of improving its energy efficiency (such as by making them easier to heat or by replacing fossil fuel systems with renewable energy-based systems), or its resilience to climate change
Scheduled Monuments	Archaeological sites and structures that have been recognised as nationally important due to their historical or cultural significance. These can include both above-ground and below-ground features such and standing stones, burial mounds, or the remains of monastic buildings, among others. Monuments are added to the Schedule by thr Secretary of Stateif they are deemed of national importance.

Short stay accommodation	Accommodation providing residential tenancies, typically provided on a daily basis, principally for short stays by visitors. Accommodation will typically be in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with amenities (e.g. television, internet) included in the rent. This accommodation type and includes hotels and bed and breakfast. Aparthotels or serviced apartments are treated as residential uses, for which affordable housing provision is sought, and are not considered as short stay accommodation for the purpose of the policy
Site of Special Scientific Interest (SSSI)	Areas identified by Natural England as being of special interest for their ecological or geological features. Natural England is the government's advisor on the natural environment
Site specific flood risk assessments (FRAs)	A study that determines how a proposed development will manage flood risk from all possible water sources to the site in question
Social Rent	Homes that are let at a level of rent set much lower than those charged on the open market. The rent will be calculated using the formula as defined in the Rent Standard Guidance of April 2015 (updated in May 2016) or its equivalent or replacement guidance (relevant at the time of the application).
Special Area of Conservation (SAC)	Special Areas of Conservation are areas that have been designated at a European level as important for nature conservation
Standard Method	The Government has set out a Standard Method for identifying housing need. This should be the starting point for assessing housing need and it identifies an overall minimum average annual housing need figure
Student accommodation	Accommodation whose main purpose is to house students in higher education, registered on full-time courses of an academic year or more in Oxford
Sui Generis	A term used to categorise buildings that do not fall within any particular use class for the purposes of planning permission. Such as petrol stations and cinemas
Sustainable Urban Drainage Systems (SuDs)	Sustainable Urban Drainage Systems are a sequence of water management practices and facilities designed to drain surface water and protect against flooding. These include porous roads, high-level road drainage, swales, soakaways, filter trenches, wet and dry attenuation ponds and ditches. SuDS helps mimic natural drainage processes and can provide benefits in terms of sustainability, water quality and amenity
The City Centre Archaeological Area	Area of the city centre where archaeological remains are almost certain to be present
Traffic filters	Cameras that are intended to reduce traffic levels in Oxford by managing the use of certain roads in the city by private cars
Transport assessment	A thorough assessment of the transport implications of development

Transport statement	A 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts)
Whole building approach	In the context of retrofitting, taking a Whole Building Approach means that improvements are informed by an understanding of how the entire building and the different materials that it is comprised of currently performs, considering issues such as air quality, damp management and ventilation. It involves selecting fabric improvements and other upgrades that complement each other to ensure the best results for the long-term sustainability of the building and health of occupants and avoiding problems of maladaptation, whereby improvement projects can have unintended, negative consequences (such as excessive moisture build-up, or inadequate ventilation)
Working drivers	Residents and drivers who are dependent on their vehicle more than 50% of their working day to earn a wage. Where the vehicle is required to undertake multiple journeys in the city (or wider) to deliver the service provided by the business. Examples include NHS community-based staff, carers working for private care companies, delivery drivers, plumbers, electricians and other trades, mobile hairdressers, dog grooming, food bank staff
Zero Emission Zone	An area within Oxford that prevents vehicles that emit Carbon Dioxide for travelling through without an associated charge

APPENDIX 1 – STRATEGIC

APPENDIX 1.1 DESIGN CHECKLIST

Introduction

Purpose of this design code/guide - what it does
The design guide sets out the key considerations that applicants will need to respond to in order to demonstrate high-quality design in line with requirements of Policy HD7.

The guide also brings together broader design considerations in Oxford which will arise from the requirements of policies across the Local Plan.

Structure of this design code/guide
The design guide is structured as a series of questions which the City Council will look to see answered as part of a planning application. These answers will explain the design approach, most likely in the design and access statement. Under each question are a series of prompts intended to help flag key issues, the relevant Local Plan policies are noted, as are helpful guidance documents or information sources. Many of the topics are inter-related, cross references are provided where this is clear although the issues covered should also be considered as a whole. Context should always be the starting point of the design process, and the contextual analysis will inform many aspects of design. For major developments, where early consultation with the community is encouraged in the Statement of Community Involvement, this should include engagement on context and how that may inform design.

The structure of the document has been loosely guided by the key principles of high-quality design as set out in the National Design Guide, tailored to an Oxford setting.

Context

The context refers to the attributes of the site and its surroundings. Understanding and responding to context is complex. It applies to the physical, but also cultural and historic context. Understanding context is important, but an appropriate response will not merely be to copy existing built forms and densities. A thorough understanding of context is a key starting point in good design, as not only will it help to ensure a high-quality development, it will also help to identify the key opportunities and constraints that the design process will need to work at an early stage to ensure a successful application.

C.1 What are the key features identified in the contextual analysis that should inform the design?
The constraints and opportunities plan should form a key part of the design and access statement, explaining the design story and showing how the key features of the site have been identified and help to inform the design proposal. The analysis should therefore be wide-ranging, including but not limited to:

- What is the landscape/townscape character of the area (e.g. Riparian edge, clay hills, gravel raised bed) and the urban character of the area? What is the built-form in the area? Are there features that have a positive or negative impact on character, and how should this affect the design? Relevant may be roofscapes, materials, detailed features such as windows, boundary treatments and height and massing. Heritage assets on or near the site will need particular attention. See: Oxford in its Landscape Setting:

https://www.oxford.gov.uk/downloads/download/1054/014_des_-_design_and_heritage_

- What are the major movement corridors around the site – including roads, public transport routes, cycleways and footpaths. What is movement like along these corridors at present? Are there barriers or pinch points which constrict movement? What is access like into the site?
- What is the natural landscape like around and on the site? Is there green open space and what function does it provide? What is tree canopy cover like? Are there green or blue corridors or is there the potential to establish these by connecting up fragmented areas? What habitats are present and are there designated ecological or geological sites that could be susceptible to harm? Are there waterways or other blue features? See: Oxford Urban Forest strategy; Green Infrastructure study 2022; Playing pitches study; Natural England mapping
- What is the heritage context of the area? This is expanded upon in section C2 below.
- What other constraints could be present (e.g. areas of flood risk, air pollution hotspots, noise environments)?
- What features/constraints could be present below the ground (e.g. utilities, soil quality/typologies; groundwater levels and movement; archaeology; contaminated land)?

Additional data sources (such as up-to-date satellite imagery, biodiversity/ contamination/hydrology surveys) could be used to inform the site-specific context.

C.2 What is the heritage and cultural context of the site and are there any heritage assets that may be affected by the development?

The historic character of the city is unique and comprises a range of heritage assets, many of which are designated either locally or nationally.

- When considering whether there are any heritage assets that may be affected by the development, the setting of these must also be considered. If there is to be any impact on a heritage asset, a heritage statement will be required. This may be standalone or form part of the design and access statement. Policies HD1-HD6 and HD9 set out what is expected.

The following sources of information will help to identify whether any heritage assets or their setting may be affected by the development:

- Historic England List https://historicengland.org.uk/listing/the-list/map-search?clearresults=True/_
- Historic England Heritage at Risk Register https://historicengland.org.uk/advice/heritage-at-risk/search-register/
- Conservation Area Maps and Appraisals https://www.oxford.gov.uk/info/20195/conservation_areas/871/conservation_areas_
- Oxford Heritage Asset Register https://www.oxford.gov.uk/info/20196/oxford_heritage_asset_register/874/oxford_heritage_asset_register_-_overview

Heritage assets offer an opportunity to maintain and inject local character. They are distinctive, and responding to them positively will help ensure a contextually rich design, as well as maintaining the significance of the asset.

C.3 How has the design rationale responded to the presence of important views across the city?

Views are particularly important in Oxford: there are wide-ranging views to and from and across the buildings in the historic core which include the internationally renowned skyline, which as an entity is considered a heritage asset; and views out towards the city's unique setting (which includes the green hills rising up around the city and the low-rise character of its suburbs). Also relevant are the views and setting of each individual tower and spire that comprises the iconic skyline, as this includes individually listed buildings of the highest significance.

Several types of views need to be considered:

- Long ranging views across the city that are protected (Policy HD9) - information on these can be found at: https://www.oxford.gov.uk/info/20064/conservation/876/oxford_views_study
- Views identified in conservation area appraisals – typically shorter in range but important role in supporting the character of these areas – information on these can be found at: https://www.oxford.gov.uk/info/20195/conservation_areas
- Views out towards the city's landscape setting and low-lying suburbs and landform which visually present the story of Oxford's history and development
- Locally important views that create or aid appreciation of the townscape and character of the area, including those potentially identified in neighbourhood plans.

The high buildings TAN identifies four principal visual characteristics that are worth considering when assessing views and how a building could impact on them:

- The iconic spires and silhouette of the historic city centre.
- The open and natural character of the river floodplains.
- The green (wooded or agricultural) backdrop to the city formed by the surrounding hills.
- The enclosed and often intimate views within the city centre.

As set out in policy HD9, the methodology outlined in the Assessment of the Oxford View Cones report will support in assessing potential impacts of high buildings on heritage significance.

Built form

Built form refers to the 3-D arrangement of streets, open spaces, development blocks and buildings. An appropriate built form and the design rationale will need to explain how the contextual analysis has informed this. It is important that the elements of built form set out below are not considered in isolation later sections in the guide such as movement and public space also play an important role in determining the correct arrangement for the site.
Site layout and block arrangement

B.1 Has the proposed site layout been informed by the features identified through the contextual analysis? ;

The layout of development on a site and the siting of uses within that need to consider the contextual analysis. A comprehensive analysis should help to inform which parts of the site are more sensitive to development or need to be avoided completely. Policy HD8 sets out important considerations regarding the site's context that will affect the overall density of the development.

- Does the contextual analysis suggest that any areas of the site need to be left undeveloped, for example because of archaeological remains, valuable habitats, mature trees or areas of flood risk? These undeveloped areas will not only affect

site layout and block arrangement but also height/massing and density, and will influence the pattern of streets.
    - Certain constraints may be able to be overcome through targeted design measures to allow development to come forward in an acceptable way – e.g. contaminated land could be remediated; noise concerns could be overcome with sufficient attenuation measures, open space may be able to be re-provided.
    - Other constraints may necessitate an arrangement of the site that completely avoids the concern – for example if part of the site is particularly high risk from flooding or to ensure a sufficient buffer to a sensitive ecological site nearby or a watercourse.
- The built form of the surrounding area will likely influence site layout. The design will need to respond to the way that buildings and spaces are arranged around the development site, including their heights, massing and density. Existing building lines should also be considered, and in most cases it will be appropriate to continue these where relevant. If that is not the design choice, the rationale should be explained.
- Movement will also be a key part of informing the site layout. The contextural analysis should identify existing accesses, roads and footpaths, and key destinations in the surrounding area. The Movement section has more detailed considerations but particular questions that may influence layout could include:
    - Are existing accesses adequate, or do they need to be moved or enhanced?
    - Can access be achieved (or are any additional accesses needed) for vehicles or just for cyclists and pedestrians to improve their choice of routes and to allow direct crossing of desire lines?
    - How direct is access through the site to surrounding destinations such as shops and bus stops and can it be made more direct?
    - How easy is it to navigate through the public realm? Key navigating points, or nodes, may be marked by buildings with notable features to make clear that it is a significant point in the network and to make routes memorable. Small block sizes can help maximise choice of routes.

B.2 What is the strategy behind the configuration of development blocks and how has this been tailored to the opportunities and constraints of the site?

Proposals should consider how different configurations of block typologies can satisfy the need of the development and respond to existing context. In general, key considerations will be the orientation of blocks, how they fit into the surroundings and maintain or create views and glimpses, the impact on solar gain, any wind tunnel effects and so on. The location of uses within blocks may need to be tailored to specific constraints on the site and surrounding area, for example noise pollution. Retail and similar uses that create activity will be best located on a frontage on primary streets. The uses proposed will influence the type of blocks. There are specific considerations for particular block arrangements:

- Standalone detached blocks may be more suitable for constrained sites or infill development, however standalone buildings can also be used in key locations on larger sites as statement buildings that can bring interest and improve legibility of site. Careful consideration needs to be given to the spaces between buildings to ensure they are integrated into their surroundings successfully. They typically give fewer opportunities to establish defined open space so the surrounding public realm will be particularly important establishing their character and setting.
- Courtyard or perimeter block arrangements establish more continuous building lines along the boundaries of an urban block and can offer more opportunities to contain shared space within. The shape and size of shared spaces within the

blocks can be varied based upon the needs of the occupants but should also be based upon wider environmental considerations such as presence of daylight/overshadowing.

- Where a site requires more flexibility but an appropriate amount of space more hybridised blocks arrangements can be more effective. This incorporates more breaks in building lines that can act as secondary access routes. Hybrid arrangements can allow for more variation in heights and massing, introducing more visual interest as well as opportunities to attain greater levels of floorspace whilst also keeping the footprint of the building minimised. Because of the more open nature of this type of arrangement, they can include semi-private amenity spaces that have a stronger relationship with the surrounding public realm.

B.3 How have the heights and massing of buildings been determined and how is this justified?

Oxford is particularly renowned for its spires and iconic skyline. Heights and massing of buildings should be informed by the context of the site (neighbouring uses and local built form and character) as well as the needs of the uses proposed.

- The height at which a building is considered to be high will be dependent on its surrounding context and will vary across the city. Even an increase in height of a single storey may constitute a high building. Building heights may impact views and Policy HD9 relates to high buildings. An understanding of context is critical. High buildings may offer visual interest and higher density. The choice of height should be design led, and the overall design will affect the impact of the height. Buildings at greater mass will often be more impactful at a lower height than a building of less mass. The impact on the heritage asset of the historic core is particularly important to consider.
- Vu City can be a useful resource for determining impacts of heights and reference should also be made to the methodology outlined in the Assessment of the Oxford View Cones report in accordance with policy HD9. In addition, the high buildings TAN sets out four visual tests which should be investigated as part of the design iteration process and included in the final submission proposal to demonstrate the potential effects a high building may have to the character, visual and heritage resource. These tests are:
- Visual obstruction – the physical obstruction of a feature or component in the view caused by a high building.
- Visual Competition / Complement – the siting of a high building within the same view as the feature such that the two are viewed together.
- Skylining – when high buildings break the skyline, horizon or silhouette, which may be formed by built form or vegetation.
- Change of character – occurs when the composition of a view is altered to the extent the character of the view is discernibly different to that of the existing.
    - There are other key design considerations when designing tall buildings. The profile or silhouette of the building is important. The articulation of built form should clearly respond and contribute positively to Oxford's skyline. The scope for diversity of profile / silhouette will depend on demonstrating a clear understanding of the context and positive contribution to the modulation of the city's skyline. High building designs should provide well organised and designed roof environments and contribute to the modulation of the city's skyline.
    - Microclimate is another important consideration as greater heights have greater potential to modify the microclimate. Effects may include the tunnelling of wind, partial or permanent shading of adjacent areas and / or intensification of solar irradiation. Privacy and access to light will also need

to be considered and the massing will need to be designed in a way that supports this.
    - Think about how the visual impact of the development will be influenced by the bulk and massing of buildings including the relationship between different sections of the building (e.g. how its base, its middle and its top are balanced out). Larger, unbroken facades that form bulky or homogenous building lines can have a more significant impact on the streetscape and views from a distance, which may be more harmful in more sensitive areas of the city. Taller buildings of slender form are more likely to be more appropriate than bulky tall buildings.
- Whilst more complicated massing which results in a higher surface area (sometimes referred to as a high form factor) can come at a detriment to energy efficiency (see Resources section), consider how massing and building facades can be strategically designed to create visual interest through use of smaller components or features that can create depth and rhythm where appropriate (see Articulation of building features under the Identity and Character section).
- Consider the experience of people within the streetscape as they pass by and use the building. Think about how the building fronts onto the street and how design relates to the human scale so that spaces created between buildings are welcoming and pleasant to inhabit.

B.4 How do alterations to existing buildings respect the form, scale, character and appearance of the existing building and surrounding area?

The same design principles apply when considering alterations to existing buildings; any alterations should respect the form, scale, character and appearance of the existing building. When extending a building, the impact on the existing building and surrounding buildings needs careful consideration.

The privacy and internal daylight and sunlight of the existing property and surrounding properties maybe negatively affected. Policy HD11 sets out expectations for levels of privacy, sunlight and daylight, including the 25o and 45o guidelines. With an extension there is more limited scope to consider orientation, meaning the height and length of the extension and any impacts on overshadowing will be particularly important, as well as the size and placement of windows and rooflights.

Movement

The quality of the movement network into and through a development plays an integral role in establishing its character and how it functions. Particular focus should be on enabling safe and easy walking and cycling as well as on the needs of those who are less mobile. A quality movement strategy will play a role in supporting people to access daily needs such as shops and facilities; employment and services; accessing open space and nature without having to rely on private vehicles. The way that streets are laid out can support social interaction and promote a safer public realm. Movement considerations will also need to address access to public transport for journeys beyond the local area and balance out the need for parking for those who do rely upon private vehicles.

M.1 Has movement into and through the development been considered and what is the strategy for this?

It is important that sites integrate well with the surrounding area. As part of the contextual analysis (as discussed in the Context section) movement corridors of various transport modes in and around the site should have been identified including barriers and opportunities to movement which new development could respond to.

- New developments should provide permeable streets to tie in with existing street networks and secure improved connectivity.
- Levels of movement will vary, with higher levels of activity likely to be located around particular uses like shops, schools and areas of employment and lower levels of activity in other areas such as residential streets.
- Very large sites may have streets across a hierarchy e.g. primary, secondary and tertiary routes. Even for small sites with a single access route, consideration of the position of this route within the surrounding street hierarchy should inform design.
- The street width, building height, enclosure, set backs and uses are likely to differ between the different street types to help distinguish between them (and therefore aid wayfinding) and to accommodate the level of activity of movement on them.
- Streets should not be vehicle dominated but should reflect a more human scale and allow for and encourage more active and sustainable modes of transport. Opportunities will be available for accommodating other design features, such as greening in the form of trees or SuDS, as well as street furniture and services but a balance needs to be struck to ensure that these spaces do not become cluttered.
- Narrower streets (secondary and tertiary routes) offer opportunities to slow down or remove through traffic and prioritise active travel like walking and cycling and are likely to be more fitting of residential areas. The design of new streets and alterations to existing ones should seek to encourage social interaction, natural surveillance and opportunities for active and sustainable traffic by prioritising the quality of the public realm and removing the dominance of the car in the street user hierarchy.

M.2 Has active travel been prioritised and how has design been used to ensure safety and security for all modes and different groups?

On routes of all sizes, pedestrian and cyclist friendliness should be maximised to ensure that all users are safe and comfortable throughout Oxford's movement network. The street user hierarchy should prioritise children, pedestrians, cyclists over motor vehicles and the built form and street design should reflect this. Oxfordshire County Council's Local Transport and Connectivity Plan should be referred to and its Street Design Guide provides useful advice.

- Oxford's communities are diverse with varying needs and vulnerabilities that can modify their experience of the public realm at different times; this needs to be taken into consideration in designing movement routes. Is there sufficient pavement space for different users needs – e.g. those with pushchairs, individuals in wheelchairs or with other assisted mobility needs?
- Consider how route design will impact perceptions of security and promote safety for different groups, such as by facilitating desire-lines for pedestrians and cyclists wherever possible including across open spaces. Avoid creation of spaces and routes that feel cut off or lacking in visibility and take opportunities to reduce street crime/fear of crime and deter anti-social behaviour. Think about how different routes might be experienced at different times of the day and in different seasons, how could perceptions of safety change at night or in bad weather and how can street design be used to improve these (e.g. lighting, shade and shelter).
- Consider also how use of planting could be incorporated into roads, streets and paths to soften the urban fabric and encourage active travel across the site and beyond. Green features like trees that provide canopy cover can be beneficial for providing shade to pedestrians during the summer months as well as movement corridors for wildlife; careful placement of hedges can act as a buffer to air pollutants as well as softening noise impacts. However, care should be taken in choice of species and placement to ensure negative impacts are avoided – for

example certain species can produce pollutants that reduce air quality, whilst poor design can also trap air pollution (e.g. large tree canopies reducing air flow within narrower street canyons). See Nature section for more information.

- Think about how street design can support active travel in other ways, for example by providing secure storage for bicycles to ensure that people have somewhere safe to leave bikes in between travelling. Think about how and where these should be located, think about where the demand for storage would be. Is it convenient to use? Does it benefit from natural surveillance? Has situation avoided creating hazards for other road users?

M.3 How does the layout and design of streets promote access to public transport and create areas with minimal traffic

Lower traffic streets allow more space for social interaction and for children to play and have been demonstrated to increase 'neighbourliness' and access to active and more sustainable travel and freedom of movement for children. Even in a relatively small scheme, attention can be given to creating areas with low or no vehicular traffic.

- Placement of parking areas is important, particularly on schemes with only one vehicular access. Is it possible to position parking so that cars do not need to circulate around the whole development? Has permeability been maximised for pedestrians and cyclists?
- Most schemes in Oxford will be smaller, infill schemes on or near to existing bus routes, but will not have new bus routes within them. However, in cases where bus routes are needed within a scheme, these must be direct, wide and straight enough to be easily navigated for a bus driver with adequate space for passenger to wait comfortably, without conflicting with other road users.
- Think about requirements of other services like delivery vehicles and waste collection and design routes to ensure they can move efficiently. All streets should have some provision for emergency access, regardless of hierarchy. Solutions for otherwise pedestrian areas, such as designated delivery zones, may be useful.

High quality public spaces

Except for the smallest developments, most new developments will include public spaces. Multi-functionality is encouraged, from allowing movement and access to allowing social activities and recreation. The link with the Green Infrastructure strategy will influence whether there are long, narrow strips of green corridor, larger and more formal spaces, natural spaces or small pocket parks.

P.1 Are all spaces clearly defined, with a clear purpose, with no awkward or leftover spaces?

Public spaces should be well-defined and clearly distinguished from private spaces. The purpose of the public spaces should be clear, with a certain amount of flexibility about their future use. For example, if routes are segregated, with pavements or cycle lanes for pedestrians and cyclists, the divisions should be clear, but potential for change in the future should also be considered, for example to a shared space. Public open spaces should be obviously public, clearly visible, and accessible. Awkward patches of land that are too small to have an obvious function should be avoided. Landscaping and street furniture such as benches and carefully locating small spaces within the network to create a small social or stopping place will help to ensure they are functional and not wasted.

P.2 How are public spaces designed to give a sense of safety

When a public space is overlooked, with doors and windows fronting onto it, it can offer the user passing through a sense of security, this is particularly important at night and for more vulnerable pedestrians. Is there overlooking to create a sense of surveillance? Are all external public spaces such as streets and parks overlooked by windows serving habitable rooms in buildings and adjacent activity?

P.3 How do public spaces support social interaction and is there adequate space in the public realm to linger and walk side-by-side?
The public realm should do more than just enable people to walk from a to b. Except in the smallest infill sites with only a short access road, there should be an opportunity to design the public realm to include wider and more spacious areas that enable people to interact with others. Routes for pedestrians should not be so narrow as to require single-file walking. Oxfordshire County Council's Street Design Guide provides useful advice.

P4 How are any public open spaces designed with all ages and needs in mind?
Public spaces should be useable and attractive for everyone. Playable space and playful streets that are welcoming to all support sustainable communities and wellbeing. This is important in all of the public realm, not just large parks and squares and playgrounds. Smaller, informal spaces including pavements, pocket parks and small community gardens and growing spaces can all provide these opportunities. Those with visual or hearing impairments benefit from well-designed spaces that are easy to navigate and pleasant to use.

P.5 How has the public realm been designed to be flexible, adaptive and stimulating
Public realm should be able to respond and adapt to various uses and needs and it should also be engaging. Variety in the public realm will help achieve this. How will there be opportunities for children and adults to play games and be active or stop and watch the world go by? All senses should be considered, including the sounds that different planting and surfacing may make, visual variety and smells.

Identity and character

Identity and character are influenced both at a broad level as was discussed under the Built Form section, but also on a more detailed level, by the articulation of specific features of buildings and spaces as well as the choice of materials. Where these elements come together successfully, they can help to generate local character that makes a development distinctive and memorable and gives users a sense of pride as well as establishing places that are sustainable and resilient for the future.

Articulation of building features

I.1 Do the proposals contribute positively to the roofscape?
Oxford has a rich roofscape and new development needs to consider any impact on it. The positive design of roofscape will help to enhance any significant long views the development might be part of and also the experience of the place at street level. The contextual analysis undertaken on the development site will help inform an appropriate approach to the design of rooftops.

- How the design of roofscape sits within longer views will be particularly important where the development is sited within the protected views that cross the city, but also where it is sited within views identified within Conservation Areas Appraisals – See Views section.
- Along with the presence of protected views, consideration should be given as to whether there are specific characteristic aspects of roofscape in the area – this

will be of particular relevance where the site is located within a conservation area – for many of the CAs the style of rooftop is an important element in their designation.

- Variety in the roofscape through a mixture of flat and articulated roofs can help to provide visual interest. Think strategically about the appropriateness of additional features such as dormers or extractors. Where incorporated carefully, these can add visual interest and punctuate the roofline, but their incorporation needs to consider the wider context of the area as well as the overall balance of other features on the building.
- Where roofscape design is less constrained and particularly on larger developments or those within constrained site boundaries, consider how design could support the use of rooftops as communal areas or private amenity space. Equally, think about how rooftops can support wider environmental/sustainability objectives such as promoting biodiversity, and rainwater harvesting, as well as roof-mounted photovoltaics (which can be integrated with green or biodiverse/brown roofs). See Nature and Resources sections.

I.2 How have façade details such as windows and entrances been designed with consideration of any positive characteristics in the area?

As with roofscape, the articulation of façade features like windows and doors can play a major role in contributing to the character of the building and the setting of the wider area. Again, think about the contextual analysis and what factors might need to be considered in the design of these features.

- Articulation of the windows on surrounding buildings including their size, positioning and the types of materials used in their construction. Think about how the design of window/doors will fit in with the rhythm of adjacent buildings so that they respect and enhance the positive character of the area where possible. Where contrasting design choices are made, these should be justified.
- As well as the location of windows/doors, think about how the specific glazed features are designed, including how individual panes are subdivided. Large uninterrupted areas of glazing (e.g. a wide, undivided patio door) can give the impression of voids which may be detrimental to overall design depending on where they are located. Conversely, use of glazing that is subdivided on particular facades can draw attention to these elements in a positive way, but can be equally disruptive where multiple styles of sub-division, or uneven subdivision are located on one frontage.
- Think about the impacts of window/door sizing and spacing on internal amenity. Larger areas of glazing can allow for more daylight but could disrupt privacy, so may be more appropriate at levels higher than ground floor. Equally, size and positioning of glazing can impact solar gain and indoor thermal comfort – there are specific requirements for meeting overheating tests set out in the Building Regulations (Part O – Overheating) which need to be balanced out against design aspirations to ensure planning permission is not in conflict with building regulations. See Resources section.

I.3 Attention to detail: storage, waste, servicing and utilities

Design will need to take into account a range of external features servicing the development and its occupants; it is important that their impact is considered both in terms of their location and the materials they are devised from. Are external servicing features such as bin storage facilities, rainwater goods integrated into the design of the development with well considered placement?

- The positioning of features like bins and storage for outdoor equipment (including bikes) at the front of buildings can have a negative impact where they protrude inappropriately as well reducing the perceived activity of frontages which can

impact the street scene and reduce perceptions of safety. Think about how these could be positioned away from facades intended to provide active frontages, potentially to the rear of properties and away from the streetscene where possible, though it is important to ensure that there is good access for users and it is acknowledged this isn't always feasible. Where positioning away from street scene is not possible, there will be a need for high quality materials and more careful design that can reduce impacts.

- Think about the impact of other external features required to provide for essential services such as meter boxes, gutter pipes, satellite dishes and Electric Vehicle charging (see Resources section for more on EVs). Whilst these should again be located in a way that minimises their visual impact and best fits in with the character of the building and the local area, it may not be feasible to fully limit visual impact by position alone. Again, this is where it is important to pay attention to material choice and specific design characteristics like size, colour, and location and factor this early into the design process. Can these features be designed with a similar colour to the wider building? Can features like guttering be integrated into the façade?

I.4 How do the materials chosen reinforce the overall design concept, respect the local context and ensure high quality?

It should be explained in the DAS how the contextual analysis been used to inform the materials chosen. Considerations that may be of relevance as part of the design rationale for materials used could include:

- In many cases it is likely to be appropriate to select materials and vernacular used in the local area as well as wider Oxford. Where contrasting materials are deliberately chosen for example to create visual interest and distinctive style, the design rationale should be justified, including with regard to the impact on existing character.
- It may be appropriate to use combinations of materials or different materials on different parts of the building for example on different storeys or in order to articulate certain parts of the structure. In those cases, the change from one material to another should appear logical and be justified within the design rationale.
- The selection of materials should consider various characteristics including colour, variation, reflectivity, texture of materials.The extent and character of glazing will also influence the appreciation of a building. The use of prominent colours and materials should be carefully considered; muted colours that respect the existing character of Oxford may be most appropriate. Substantially glazed elevations should demonstrate sensitive appreciation of orientation and reflectance.
- Consider the way materials are seen and appreciated under different atmospheric conditions, for example in bright sunshine and at different times of the day and night. This should be tested through the provision of visualisations agreed during pre-application consultation.
- Materials utilised in external/detailed elements like rainwater harvesting (e.g. guttering), boundary treatments (e.g. fences, walls) and other extraneous features, also need careful consideration, particularly where these are publicly visible. Are these of a high quality, durable and in keeping with the wider context of the building and the local area?
- Consideration should also be given to how the materials will perform over time; they should be chosen to be long-lasting and wear and weather well, without degradation of their aesthetic appeal or functionality. This applies to materials used in the buildings and also external areas including private amenity space and public realm which will be subject to differing levels of wear (e.g. weathering). In

external areas, materials should be easy to maintain and repair, and when it comes to replacement, easy to source matching materials.

- Other considerations of relevance to material selection could include how they will support other design choices and sustainability. For example, considering the embodied carbon cost of particular materials, as well as thermal performance of fabric materials which is important for energy efficiency and maintaining a comfortable indoor environment throughout year (see Resources section and policies R1, R2 and G9).

Nature - Green Infrastructure and biodiversity

Given the constrained nature of the city and increasing pressures on landscapes and biodiversity arising from all sizes of development, it is essential that the provision of green and blue infrastructure are considered at the earliest stage in the design process. Natural and designed landscapes that integrate existing features and incorporate new features should offer multi-functional benefits including for health and wellbeing, biodiversity, water management and climate change. Impacts on existing biodiversity should be avoided and new spaces for wildlife and flora prioritised, integrating with the wider ecological network wherever possible, so that development can help to enhance biodiversity across the city.

N.1 How has design been informed by an understanding of the quality of existing Green Infrastructure features on and around the site and are these being retained/enhanced wherever possible?

Design should be informed by an understanding of the quality of existing green and blue features on and around the site and the value they contribute to the local area as well as wider GI network. A range of factors should be considered in determining quality – think about not only age and physical condition but also their value to wider amenity of the area as well as other functions that may not be as visible – such as benefits for biodiversity; climate adaptation and carbon storage; as well as being of heritage significance (e.g. Registered Parks) or contributing to the setting for heritage assets or for physical recreation.

- Retention of existing green infrastructure should always be the priority, particularly where this is high-quality and could be challenging or time consuming to replicate elsewhere. Mature trees and hedgerows for example take many years/decades to establish and it is preferable for development to be designed in a way that avoids adverse impacts such as their removal.
- Certain functions of green infrastructure are specific to their existing location, making them infeasible to relocate, for example where they contribute to setting of heritage assets; protect reserves of carbon heavy peat; or act as flood storage within the functional flood plain.
- The potential for enhancement of lower quality features should also be considered, this can help meet the requirements of the Local Plan such as for the Urban Greening Factor (Policy G3) or biodiversity net gain (Policy G4).
- It is important that design not only considers the site itself but also the areas that extend beyond the boundaries and the interconnections between green features wherever possible. This will help meet the requirements of Policy G2 on enhancement and provision of green and blue features.
- Consider whether there are existing linear features such as lines of trees, hedges, pockets of green spaces or watercourses that extend into or alongside the site. These can be important spaces for movement of wildlife and people and support an array of habitats. Consideration should be given to strengthening these existing connections, enhancing existing habitats, and avoiding any further fragmentation. Potential for recreation and movement should also be considered.

A range of tools and metrics are available to inform assessments of existing GI and should be utilised where relevant including existing information in the Oxford GI study 2022; the Council's Urban Greening Factor tool; Natural England's GI standards; the DEFRA Biodiversity metric as well as other best practice such as the British Standards for trees BS.5837:2012 (or its future equivalent). Refer to satellite mapping as well as other data sources that details the types of green features, spaces and habitats that surround the site.

N.2 How have new Green Infrastructure features been designed to deliver multiple functions/benefits for the sustainability of the environment and health and wellbeing of people?

Green infrastructure needs to be considered in design with the same level of importance as traditional 'grey' infrastructure like sewers and roads, particularly as it is often able to perform multiple roles that support the sustainability of a development and its occupants. This is especially important in Oxford where our green space is limited or unevenly distributed. Policy G2 sets out the various multi-functional benefits that new GI should seek to deliver, and green and blue features should be selected to meet the needs of the proposal and the wider area in this context. Highlighting where design features are addressing multiple policy requirements (for example providing green space for occupants as well as SuDS features that can reduce flood risk) will help in demonstrating the merits of an application and the overall approach.

- The functionality of open space and the role any type of provision plays in supporting occupants of the development should also be informed by an understanding of the wider local context as well as the needs of the users of the development. Consider what types of spaces are available already in the local area, whether there are deficiencies in certain types of space that could be addressed by the proposal.
- The scale of the development is likely to influence the levels of opportunity for provision of green spaces but all sites should be able to provide some level of high-quality greening – this will be an expectation on major development, to be demonstrated via the Urban Greening Factor (Policy G3). On larger sites, networks of green spaces can help to break up urban fabric as well as green corridors. For larger applications with public open space provision, engagement with the local community will help inform the type of space needed.
- Simple design solutions such as avoiding extensive areas of artificial surfaces like tarmac or concrete can be beneficial for the long-term sustainability of a site and can be beneficial in helping to meet specific policy requirements such as those set out for the Urban Greening Factor (Policy G3) and Soil quality (Policy R6).
- On building facades such as roof and walls, use of green features where carefully installed can further reduce artificial surfaces and promote more multi-functionality. This approach can be particularly helpful on more constrained sites, where opportunities are limited elsewhere.
- The plan for ongoing management and maintenance of green features should be set out. Care will be needed during the establishment period (including watering and feeding as well as replacement of failed specimens) but also ongoing care needs such as pruning of trees and shrubbery and maintenance of green spaces.
- Green spaces with a mixture of play features for young people will enhance wellbeing – these spaces do not have to be overly designed or dominated by fixed equipment, but could also be compromised of wild areas and facilities that encourage engagement with nature and free-play.
- Opportunities for communal food growing, which could be small scale and informal such as community orchards can also meet an important need not only for food but also social engagement and mental health.

Information is available published data sources from the Council (such as the Oxford GI Study 2022, the Playing Pitches study). National data sets such as the mapping accompanying the Natural England Green Infrastructure Framework and OS data.

N.3 Are there protected species or other biodiversity/habitat features on the site or in proximity to the development and how has the design been tailored to avoid adverse impacts and/or enhance these features?

- Part of the contextual analysis informing design should be an understanding of the potential for protected species or other biodiversity value (such as important habitat) on the site and ensuring design responds in a way that avoids adverse impacts in line with the mitigation hierarchy and ideally enhance these features.
- The site layout will need to be informed by considerations arising from proximity to important habitats and take into account the potential for causing impacts even at a distance.
- Where a development is proposed in proximity to a designated ecological site, the layout of the site may need to be designed in a way that incorporates sufficient buffering – potentially through use of landscaping features and informed by appropriate ecological expertise. Buffering may also be required where there is proximity to blue corridors.
- Where there are sufficient indicators of species of interest, there may be a requirement for detailed biodiversity surveys which can ascertain the specific nature of species present and help inform any mitigation that may be necessary.

A range of information sources are available detailing the presence of biodiversity interests in the city, including a detailed set of records held by Thames Valley Environmental Records Service (TVERC); as well as habitat data from Natural England (Magic tool), and the network of ecological sites designated by Policy G5.

N.4 How have external areas and features provided on the site been designed to support biodiversity and allow wildlife to flourish?

It is important to consider the types of landscaping features and how these can support feeding and shelter of various forms of wildlife where possible. Care should also be taken in the design of site features which could impact wildlife.

- The inclusion of native and/or pollinator friendly planting, as well as species that bear fruits/nuts is encouraged in order to support feeding for example.
- Making space for areas of informal planting that can grow wilder during the year can provide opportunities for shelter and hibernation within the urban environment.
- Species selection should avoid invasive species or those that are particularly harmful to people or the wider environment.
- Consider how the design of external lighting could impact on the wider environment and avoid overuse of artificial lighting where it could be particularly detrimental to nocturnal species.
- Try to limit other sources of disturbance such as noise from plant equipment and emission of pollutants into the air or water – these are considerations which will be of equal importance during the construction phase as much as during the operational phase and will help to meet the requirements of Policy R7.

Resources

It is essential that development responds to the challenges of climate change. This includes meeting net zero carbon and having buildings that are resilient to hazards like overheating and flooding, and prudent use of natural resources. Many of the responses to these challenges, such as energy efficient design and efficiently performing buildings will need to

be thought about at the beginning of the design process. Careful design choices can secure efficient buildings and reduced impacts on the environment, whilst also securing high-quality design and benefits for the health and wellbeing of occupants.

R.1 How has development been designed to ensure it is net zero carbon in operation and in accordance with the energy hierarchy?

Policy R1 sets out the energy hierarchy and its application in the design of new buildings. The first step in the hierarchy is designing so that demand for energy to operate the building and its systems is minimised, this could be achieved in a number of ways many of which align with Passivhaus principles such as:

- Orientation - Design the orientation of the building so as to maximise solar gain in the winter (e.g. south-facing) and minimise overshadowing. Dual aspect, south-facing facades are particularly beneficial for this where a site allows.
- Massing - Consider how the massing of the building will influence energy required for heating/cooling. Be strategic in how the articulation of elements such as roof shape, the use of insets and overhangs as well as the grouping of dwellings are used to achieve character without resulting in excessive form factor (the ratio between the external surface area and the internal treated floor area) which will require greater amounts of energy to heat/cool. Also think about whether all spaces require heating/cooling - grouping of 'cold spaces' like garages and bike sheds can allow for a more efficient layout.
- Facades including glazing - Think about how the proportions of glazed surfaces like windows/doors can influence performance. Design glazing with considerations of orientation, daylight and thermal comfort in summer. It is important to minimise heat loss towards the northern elevations in winter, such as by incorporating smaller windows on northern facades, whilst solar gain needs to be maximised on southern facades where window sizes could be bigger. Equally, higher storeys are likely to benefit from more light so could include reduced levels of glazing than lower levels.
- Fabric-first - Take a fabric-first approach which seeks to incorporate high levels of insulation; a very air tight building fabric as well as minimising thermal bridges. Use of triple glazing in windows/doors will help with thermal efficiency of these elements.
- Ventilation - Include efficient ventilation systems in order to preserve good indoor air quality, avoid overheating and moisture build up. Because of the need for high air tightness in building fabric as outlined above, net zero carbon homes are likely to require some form of mechanical ventilation with heat recovery which will allow for a constant rate of ventilation. Consider the placement of these systems to allow for easy access and maintenance. Habitable rooms need to have openable windows – ideally try to ensure windows are placed on opposing sides of the building to facilitate purge ventilation providing bursts of fresh air through the building as required.

After minimising energy use, the second step in the energy hierarchy as set out in Policy R1 is that design should consider how energy is used as efficiently as possible and sourced renewably. Each development site will have its own considerations but some factors to consider include:

- Use of heat pumps that can secure cooling as well as heating and can be up to 3x more efficient than other heating systems. Where a building has followed the principles of high fabric efficiency above, they will be well set up for the more gradual heating method of technologies such as air source heat pumps.
- Consider the orientation of the roof and how this can maximise performance of solar photovoltaics and thermal technology. Consider the types of systems the

building will accommodate, the orientation of the roof to maximise solar irradiation, and the structural considerations to support pv in high winds.

- Careful design can allow solar pv and green roofs to exist mutually with the correct orientation and placement of panels – indeed the cooling effect of green roofs can support the performance of pv (which can reduce at very high temperatures).
- Design of the renewable energy generation system can be made more efficient through incorporating battery storage to make use of the renewably generated energy at times of low capacity. Space will need to be made to incorporate such systems.
- Design considerations for electric vehicles chargers such as location and placement, size of unit and colour for example will be particularly relevant where installing in a sensitive area of the city (e.g. conservation area). Properties without a driveway may need to consider potential for other solutions such as pavement cable channel as a priority before considering the need for creation of new driveways. There is additional information on the City Council website and the County Council's website.

Where proposals involve the retro-fitting of existing buildings (including traditional buildings), policy R3 sets out the importance of being guided by a Whole Building Approach, as well as other guidance that should be considered in design. Reference should also be made to the Council's Retro-fitting Technical Advice Note as well as Historic England's advice note.

R.2 How has consideration of the carbon footprint embodied within the construction process been incorporated into the design?

The issue of embodied carbon in the construction process is not a simple one and will be influenced by various considerations such as the types of materials selected, where they are sourced from, how they are put together and their longevity. Nevertheless, having consideration of this issue upfront and throughout the design process will ensure opportunities to reduce carbon emissions embodied in the construction process are not missed. Think about:

- Reuse of buildings - consider whether demolition of existing buildings is really necessary and reuse buildings where possible (try to reuse demolition materials if not). Maximise recycling on the site and the use of recycled materials more generally and minimise waste.
- Source of materials - consider where materials are sourced from and how these are to be transported to the site. Can modular construction techniques be utilised to prepare parts of the building in advance and be brought to site? This is also a good way to reduce waste in the construction process.
- Types of materials - certain materials have a higher carbon cost to produce than others. Some materials can come in lower carbon alternatives such as low carbon concrete mixes. Natural materials like wood and hemp which may be used in the structure, insulation or the finishing, can even sequester (lock up) more carbon than is emitted in their production. In terms of the finishing, can elements be left open/uncovered without the need for additional finishes being applied?. For example, careful selection of the material used to construct the floor can mean there is no need for additional carpeting or other coverings.
- Maintenance - think about the entire lifespan of the building. Ensure that easy maintenance of the building and its systems are considered to support longevity.
- The future - consider how design of features and layout could allow the building and its spaces to adapted to alternative uses in the future. What will happen at the end of its life span? Plan for ease of deconstruction in selection of materials and construction methods.

R.3 How does the design consider resilience to the impacts of overheating and water stress/drought in a changing climate?

A highly fabric efficient building should be as good at keeping heat out during the summer months as it is in keeping heat in during the winter months. However, the performance of the building during high heat events should be an integral consideration in the design process and additional measures that can reduce the risk of overheating are greatly encouraged. There are certain requirements that will need to be met to pass Building Regulations (specifically the requirements of Part O: Overheating) - as these requirements can have a close relationship with design process, it is helpful to consider them together.

Policy R9 sets out the importance of design being guided by a cooling strategy which follows the principles of energy saving and efficiency in line with the energy hierarchy, promoting passive cooling options in the first instance before exploring more energy intensive measures. The following hierarchy should be used as a guide for selecting cooling interventions:

- Minimise internal heat generation and reduce amount of heat entering a building in summer through energy efficient design and careful building layout/design (e.g. orientation, shading, albedo, fenestration, insulation and green infrastructure)
- Manage the heat within the building through exposed internal thermal mass and high ceilings
- Passive ventilation
- Mechanical ventilation
- Active cooling systems (ensuring only most energy efficient technologies are used).
- Consider how the design of façade elements such as windows can reduce solar gain during the summer months. Windows on southern elevations will experience sunlight coming in at a higher angle in the middle of the day which can be easier to address through fixed shading like wider eaves (and other forms of overhang like balconies). Use of shutters and windows that open to allow rapid ventilation through the building can allow occupants to quickly respond to temperature extremes.
- Consider how water saving measures such as water efficient fixtures and fittings as well as grey water recycling can be incorporated into the design to reduce water use, alongside rainwater harvesting features to collect water for uses such as gardening. Where these features require elements on the roof, there will need to be sufficient space to accommodate these alongside other features like green infrastructure, renewables and plant equipment.

R.4 How does the design consider resilience to the impacts of flooding in a changing climate, avoiding increasing flood risk elsewhere and ideally reducing existing flood risk?

The approach to site layout needs to be informed by a comprehensive understanding of current and future flood risk on the site (taking into account the impacts of climate change) as part of the Flood Risk Assessment. There is a range of detailed guidance and data sources that should be considered. The Flood Risk Assessment needs to be integral to informing the design process and how the development is planned. Some general considerations that will need to be factored into the design process include:

- The current context of the site including existing land uses and how these may contribute to or increase flood risk. This includes whether there are areas of existing flood storage or natural features which contribute to mitigating surface run off (e.g green space and areas of planting).

- Taking a sequential approach to the layout of uses on the site with more vulnerable uses (see NPPF for vulnerability classifications) being located in areas of lowest risk from flooding on the site.
- Incorporating a range of design features into the fabric of the building itself to improve resilience to flooding and helping occupants to recover more quickly. Such measures are generally broken down into two categories: dry proofing, which seeks to keep water out at times of flood; and wet proofing which seeks to allow the building and its systems to continue to operate during flooding and be dried out quickly.
- Thinking about how design can support emergency management at time of flooding – are there clear and safe access/egress routes into the site and individual buildings, are evacuation routes easily identified for occupants including those who may have reduced mobility (e.g. elderly and disabled); how will emergency services access the site if necessary; what provision is there for alarm systems and alerts?
- Taking account of the age, construction and heritage significance of any existing buildings and structures on the site. Where retro-fit is being proposed, follow the guidance of policy R3 in relation to Whole Building Approach.

R.5 How have Sustainable Urban Drainage Systems been incorporated?

Sustainable Urban Drainage Systems (SuDS) features should be an integral component of the design of outdoor spaces in line with the requirements of Policy G8. Applicants should refer to the Council's SuDS planning guidance as well as guidance prepared by the County Council in how to design SuDS features into the development, available here. In particular, it is expected that high quality design in relation to SuDS will factor in a number of considerations including:

- Design of SuDS should follow a strategic process that seek to slow down and capture rainfall first, allowing as much of it as possible to evaporate or soak into the ground close to where it fell. The rest is then directed in a way that improves water quality towards the nearest watercourse to be released at the same rate and volumes as before development. The types of features selected should be informed by the context of the site. The Council's preference is that natural surface features which are primarily green are prioritised, these could include green roofs, ponds, wetlands and shallow ditches called swales.
- Additional context informing SuDS selection should consider the geological and hydrological conditions of the site, informed by appropriate ground investigations including percolation testing as well as testing to understand the potential presence of contamination. Issues that may be of relevance and may make certain types of drainage features inappropriate could include: unstable ground, contaminated ground, poor infiltration, proximity to buildings, the highway or other sensitive areas; presence of other services/infrastructure; as well as existing ground water levels/potential for pollution.
- Whilst SuDS features need to prioritise their water management benefits including flood retention and improving water quality of runoff, design should follow the principles of multi-functional design so that these landscape features can perform multiple benefits in the development throughout its lifetime, particularly when they are not in use at times of low rainfall. See guidance on multi-functional green infrastructure features in the Nature section.
- All SuDS should have a comprehensive maintenance plan in place in order to ensure they remain functional and safe for the lifetime of the development.

Well-designed homes and communal areas within buildings should provide a good standard and quality of internal space. The needs of occupants will relate not only to the internal space provision and how this allows them to live day to day (e.g. socialising, working and keeping active) but also to external space provision in the form of private or communal outdoor spaces. Well-designed homes also consider the varying needs of different groups in the community including the disabled and the elderly and are easily adapted to meet changing needs over time.

H.1 Are internal spaces of sufficient size and proportion for their intended functions?

It is important to ensure that new homes are of an adequate size and suitable layout to provide high quality, functional homes that meet the needs of a wide range of people, and consider how those needs might change over time. This applies to development at all scales, from large strategic sites to infill development. While there is added pressure to deliver as many homes as possible, this should not automatically result in the creation of smaller homes, or housing that has unacceptably small or poor functioning internal spaces that do not meet appropriate standards.

- Policy HD11 sets out the requirement for internal dwelling spaces to meet at a minimum the Nationally Described Space Standards. These are technical standards, distinct from the Building Regulations, that have been developed as a means to create a common baseline that can be applied across all planning authorities. It contains requirements for the Gross Internal (floor) Area of new dwellings at defined levels of occupancy, and includes areas and dimensions for key parts of the home - notably bedrooms, storage and floor to ceiling height.
- Along with living space, dwellings should allow for a usable amount of storage space integrated within internal layouts. Without it, people's belongings and items for everyday use will encroach on the space available within rooms and limit enjoyment of them. Space requirements should also consider other needs such as waste and recycling storage, which are essential for enabling people to live sustainably.
- Think about the more specialised accessibility needs of the disabled such as the need for wheelchair adapted housing, the requirements for which are contained in (Category 3 homes in Part M of the Building Regulations). Also is the dwelling designed to accommodate aging occupants and changing mobility over time? See lifespan section for more.

H.2 Does the development provide sufficient private and/or communal open space?

Occupants of new homes also need to have access to outdoor space for socialising, exercise and meeting other needs like drying clothes. Ideally there should be access to private outdoor space (such as gardens, balconies, roof terraces) but it may be appropriate to provide access to communal spaces also.

- Where outdoor space is provided, this should be easily accessible to the occupants of the development it is serving,
- Consider wider amenity issues that might affect the space such as privacy/overlooking, security, light and safety.

Lifespan

High quality design should consider how development will be sustained in the long term. Consideration needs to be given to how these places will be maintained and cared for in the future so that they can retain their quality for generations to come. Buildings and spaces

need to be flexible and adaptable to changing needs over time to allow them to remain usable and useful without needing to be replaced.

L.1 Is there a proposed management plan or approach in place for future maintenance and upkeep?

High quality design should mean that places are well-managed and maintained in the long term. For larger and more complex schemes, management and maintenance regimes should be established from the early stages of the design process and set out in a management plan.

- Consider the wide range of elements in a development and their on-going maintenance and management including buildings, landscaping, streets and open spaces, public art, sustainable drainage systems etc.
- Management and maintenance responsibilities should be clearly defined for all parts of a development. They should consider potential impacts on communities such as in the form of service charges or where management will pass into their control.
- Management of local waste, cleaning, parking, internal common spaces, shared spaces and public spaces are all considered from the outset. These include play areas, open spaces, streets and other public spaces.

L.2 How easy will it be to maintain, repair or source matching materials? Have the materials been proven to be robust and weather well?

Materials should be selected that are robust, easy to use and look after, and enable their users to establish a sense of ownership and belonging, ensuring places and buildings retain their aesthetic appeal and functionally for the long term.

L.3 How will the scheme be flexible to changing needs?

Well-designed spaces are adaptable to the changing needs of users and to evolving technologies and innovations. The aspiration is for public places that are inclusive to all. Well-designed private places, such as homes and gardens, should be designed to be flexible to adapt to the changing needs of their users over time. This would include changes such as growing households and mobility due to health changes as well as adaptability to remote home working. How easily can buildings and spaces be adapted without costly or extensive construction works?

- In keeping with the evolving nature of work, development should include adequate space and servicing to facilitate remote working. At the minimum, spaces must at least be flexible enough to be easily adapted for use as living and work and back again.
- There are broader changes to living patterns that should be integrated in design schemes, or sufficient flexibility to adapt to such changes as needed. These would include the reduction in emphasis on dedicated car parking spaces, access to EV infrastructure, adequate and integrated bin and cycle storage.
- Well-designed places should also have consideration for how digital and connectivity infrastructure can be integrated into designs from the outset, as well has how such infrastructure can be maintained and upgraded with the minimum level of disruption to wider users or compromising the functionality and aesthetic appeal.

APPENDIX 2- HOUSING

APPENDIX 2.1 METHOD FOR CALCULATING AFFORDABLE HOUSING CONTRIBUTIONS

Contributions for payments in lieu of providing affordable housing onsite (eg in relation to Policies H3 and H4) are based on seeking 40% of the value of the land being developed as a financial contribution (in other words the equivalent contribution if the land had been developed for residential use and delivered onsite affordable housing).

The formula that will be applied to calculate payments in lieu is:
X = ((A - B) x C) - ((A x C) x D)

Where:
X = the payment in lieu
A = the market value of a square metre of floorspace in the development
B = the value of affordable housing per square metre of floorspace (reflecting the blend between affordable rent and shared ownership)
C = the notional number of square metres that would be required to meet the target in Policy H2
D = additional developer costs (the difference between the profit applied to market housing and affordable housing; and marketing costs on the affordable units converted to private housing).

In addition to this, a 5% administration charge will be levied on the calculated sum payable.

APPENDIX 2.2 HMO CALCULATION

Policy H9 states that planning permission will only be granted for the conversion to or a new HMO where the proportion of buildings used in full or part as an HMO within 100 metres of street length either side of the application site does not exceed 20%.

The illustrations below show what is meant by this. The buildings highlighted in the examples would all be included in assessing whether the 20% threshold has been exceeded. It should be noted that, for the purposes of applying these guidelines:

i. Buildings containing flats are counted as an HMO only if any one of the flats within the building are being used as an HMO;
ii. Non-residential buildings are counted as an HMO only if any part of the building is in residential use as an HMO;
iii. Buildings NOT counted as an HMO include all single dwellings that are occupied by a family, a homeowner together with up to two lodgers, or by up to 6 people receiving care (e.g. supported housing schemes for people with disabilities). Also NOT counted as HMO are social housing, care homes, children's homes, religious communes, and all buildings occupied by students and managed by the educational establishment (this includes student accommodation), as well as all buildings entirely used for non-residential purposes;
iv. Any building on a plot with a curtilagethat lies partially within 100 metres will be included in the calculation, although non-habitable buildings (e.g. garage blocks) will be excluded from the calculation.
v. The 100 metres street length will include non adopted roads and footpaths.

In counting individual properties, the City Council will have regard to the number of houses, flats or buildings that are licensed HMO, or for which a licence application is pending. The Council may also count any other property for which reasonable evidence exists that the property is in use as an HMO.

APPENDIX 2.3 METHOD FOR CALCULATING THRESHOLDS FOR LINKING ACADEMIC FACILITIES WITH THE ADEQUATE PROVISION OF STUDENT ACCOMMODATION

Student threshold calculation Policy H10 applies to full-time taught course students. To inform each annual Authority Monitoring Report the universities will be asked to provide information relating to their student numbers and the number of student accommodation rooms they provide and, in the case of Oxford Brookes, purpose-built student rooms they are aware are occupied by their students. A snapshot of information will be requested from a point in time in the Autumn of the monitoring year in question. The monitoring year is the one-year period from 1st April - 31st March. The 'snapshot' figures provided for the Annual Monitoring Report will be representative of the monitoring period and applicable to Policy H10.

If a university is shown in the snapshot to be in breach of threshold, but are able to demonstrate a reduction in numbers during the year that brings them under their threshold, this will be accepted as an update by the City Council alongside an application for development of academic, research or administrative facilities. The universities will be asked to state how many students they have and specify how many of them are in each of the following categories. The following categories of students are not relevant for the purposes of Policy H10 and they will be excluded from the total number used in the calculation under Policy H10. There may be students who fall into more than one of these categories and they should not be excluded more than once:

- Part-time and short-course students
- Students studying a research based post-graduate degree
- Students studying a Further education course or a foundation degree
- Vocational course students who will at times during their course be training on work-placements including student teachers and health care professionals who have a split study arrangement between the university and the NHS including student nurses, midwifery students, paramedics, physiotherapists, occupational therapists and student doctors
- Students with a term-time address outside of the city (OX1, 2, 3, 4)
- Students living within the city (OX1, 2, 3, 4) prior to entry onto a course
- Students not attending the institution or studying at a franchise institution
- Students studying outside Oxford (e.g. at Oxford Brookes' Swindon campus)
- Specific course exclusions (BTh Theology and MTh Applied Theology)
- Students who also have an employment contract with the university
- Students on a year abroad and other placement students away from the university

The following student accommodation types will be counted as university-provided accommodation:

- Purpose built student halls managed by the university
- Rooms in other student halls for which the university has nomination rights secured, or in the case of Oxford Brookes, also rooms in purpose-built student accommodation that they are aware their students are occupying during term times.

- Other university leased or owned housing stock

The number of students who meet the definition of the policy (i.e. the total number of students minus the exclusions detailed above) will be subtracted from the total number of student rooms provided by the university, and the resulting figure will be taken to represent the number of students living outside of university provided accommodation in Oxford.

APPENDIX 3 – EMPLOYMENT

APPENDIX 3.1 - KEY EMPLOYMENT SITES

The following university/ research sites:

- University of Oxford Science Area and Keble Road Triangle;
- Old Road Campus;
- Radcliffe Observatory Quarter;
- Northern Gateway/ Oxford North.

The following hospital research sites:

- John Radcliffe Hospital;
- Nuffield Orthopaedic Hospital;
- Churchill Hospital;
- Warneford Hospital.

The following major publishing sites:

- Oxford University Press.

The following major manufacturing/research sites:

- Mini Plant Oxford (BMW);
- “Unipart” site.

The following Science and Business Parks

- Oxford Science Park;
- ARC Oxford (Business Park).

The following key knowledge / innovation sector centres:

- Wood Centre for Innovation

West End and Botley Road:

- New Barclay House, 234 Botley Rd;
- Osney Mead Industrial Estate;
- Former Botley Road Retail Park/ Botley Road Urban Science District.

Woodstock Road and Banbury Road:

- Jordon Hill Business Park, Banbury Rd;
- Summertown Pavilion, 18-24 Middle Way.

St. Clements and Cowley Road:

- Angel Court, St. Clements;
- The Gallery (Former Blackwells Publishing), Marston St;
- Newtec Place, Magdalen Rd.

Cowley and Horspath:

- Horspath Industrial Estate Pony Road, Horspath.

Garsington Road Cluster:

- Chiltern Business Centre, 198 Garsington Rd;

- Fenchurch Court, Bobby Fryer Close;
- Oxford Bus Company, Cowley House, Watlington Rd;
- Ashville Way, Watlington Rd;
- Oxford Trade Centre, Harrow Road;
- County Trading Estate, Watlington Rd;
- Huw Grays, (formerly Buildbase), Watlington Road.

Sandy Lane West:

- Eastpoint Business Park;
- Nuffield Industrial Estate, Ledgers Close;
- Oxford Trade City.

APPENDIX 4 – A GREEN BIODIVERSE CITY THAT IS RESILIENT TO CLIMATE CHANGE

APPENDIX 4.1 - URBAN GREENING FACTOR

The Urban Greening Factor (UGF) is a planning tool used to improve the provision of Green Infrastructure and increase the level of greening on new development. Policy G4 sets out that all major development will need to demonstrate how it has included urban greening as a fundamental element of site and building design, demonstrating no net loss of greening score and that it meets the minimum target score for the development type (0.3 for predominantly residential and 0.2 for predominantly non-residential schemes). Its use is encouraged on other schemes as a way to assess current levels of greening and the changes proposed but is not mandatory.

The UGF score provides a figure for the proportion of urban greening in comparison to the total area of a given development site. It is based on the assessment of surface cover types within the site boundary, and is measured for the existing situation and post development conditions following building and landscape proposals. Each surface cover type is assigned a weighting factor (between 0.0 to 1.0) that reflects its environmental and social value in urban greening; its functionality in providing ecosystem services, including improving permeability; and its benefit in supporting biodiversity and habitat creation.

The UGF score is calculated by multiplying the area of each of the various surface cover types within the site boundary by its factor; each figure is then added together and divided by the total area within the red-line boundary of the development site. The result is assessed against the policy target score for the type of development.

Calculation of Urban Greening Factor Score :

$$\text{Urban Greening Factor Score} = \frac{\text{Sum of each Surface Area type } (m^2) \text{ (Surface Area A x Factor A + Surface Area B x Factor B + Surface Area C x Factor C, etc.}}{\text{Total site area } (m^2)}$$

For the purposes of Policy G4, the Local Plan follows the categorization of green infrastructure elements and surface cover types set out in the Green Infrastructure Standards from the Natural England Green Infrastructure Framework to calculate a UGF score. For surface cover types not specified on the list, a suitable approach will be to select the closest match in the description, in discussion with the Council where appropriate.

A copy of the assessment matrix is available on the website to download. This should be completed and submitted along with the application. All surface cover types utilised in the assessment should be clearly highlighted on associated landscaping/elevation plans.

Natural England's surface cover weightings* for the calculation of UGF Score.

No.	UGF Surface Cover Type	Category	Factor	General Description
1	Semi-natural vegetation and	Vegetatio	1.0	Protection and enhancement of

No.	UGF Surface Cover Type	Category	Factor	General Description
	wetlands retained on site (including existing / mature trees)	n & Tree Planting		existing vegetation within the development site including mature trees and habitats.
2	Semi-natural vegetation established on site	Vegetation & Tree Planting	1.0	New areas of vegetation and species-rich habitats within the development site that are connected to sub-soils at ground level.
3	Standard / semi-mature trees (planted in connected tree pits)	Vegetation & Tree Planting	0.9	Tree planting established within engineered and interconnected systems with structural soils to maintain tree health at maturity.
4	Native hedgerow planting (using mixed native species)	Vegetation & Tree Planting	0.8	Dense linear planting of mixed native hedgerow species, at least 800mm wide and planted two or more plants wide.
5	Standard / semi-mature trees (planted in individual tree pits)	Vegetation & Tree Planting	0.7	Tree planting established within separate designed tree pits with structural soils to maintain tree health at maturity.
6	Food growing, orchards and allotments	Vegetation & Tree Planting	0.7	Areas and facilities provided for local allotment and community-based food growing including formal orchards with fruit trees.
7	Flower rich perennial and herbaceous planting	Vegetation & Tree Planting	0.7	New areas of mixed native and ornamental herbaceous and perennial plant species to support seasonal cycles of pollinating insects.
8	Mixed hedge planting (including linear planting of mature shrubs)	Vegetation & Tree Planting	0.6	Dense linear planting of native or ornamental shrub and hedgerow species, closely spaced with one or more plants wide.
9	Amenity shrub and ground cover planting	Vegetation & Tree Planting	0.5	Areas of formal and informal non-native shrub and ground cover planting connected to sub-soils at ground level or in planters.
10	Amenity grasslands including formal lawns	Vegetation & Tree Planting	0.4	Areas of short-mown grass and lawn used for active sports or informal recreation that is regularly cut and generally species-poor.
11	Intensive green roof (meets Green Roof Organisation / GRO Code)	Green Roofs & Walls	0.8	High maintenance accessible green roof with planting and a depth of growing substrate with a minimum settled depth of 150mm.
12	Extensive biodiverse green roof (meets the GRO Code, may include Biosolar)	Green Roofs & Walls	0.7	Green roof with species-rich planting, with limited access, may include photovoltaics, the depth of growing substrate is 100 - 150mm.
13	Extensive green roof (meets GRO Code)	Green Roofs & Walls	0.5	Low maintenance green roof, limited species mix in planting and with no access, the depth of growing

No.	UGF Surface Cover Type	Category	Factor	General Description
				substrate is 80 - 150mm.
14	Extensive sedum only green roof (does not meet the GRO Code)	Green Roofs & Walls	0.3	Low maintenance sedum green roof, no access, combined depth of growing substrate, including sedum blanket, is less than 80mm.
15	Green facades and modular living walls (rooted in soil or with irrigation)	Green Roofs & Walls	0.5	Vegetated walls with climbing plants rooted in soil supported by cables or modular planted systems with growing substrate and irrigation.
16	Wetlands and semi-natural open water	SuDS & Water Features	1.0	Areas of semi-natural wetland habitat with open water for at least six months per year contributing to surface water management.
17	Rain gardens and vegetated attenuation basins	SuDS & Water Features	0.7	Bio-retention drainage features including vegetated rain gardens and attenuation basins that also provide biodiversity benefit.
18	Open swales and unplanted detention basins	SuDS & Water Features	0.5	Sustainable drainage systems to convey and temporarily hold surface water in detention basins with minimal vegetation cover.
19	Water features (unplanted and chlorinated)	SuDS & Water Features	0.2	Ornamental and generally chemically treated water features providing amenity value but with minimal biodiversity and habitat benefit.
20	Open aggregate and granular paving	Paved Surfaces	0.2	Porous paving using gravels, sands and small stones as well as recycled materials that allow water to infiltrate across the entire surface.
21	Partially sealed and semi-permeable paving	Paved Surfaces	0.1	Semi-permeable paving using precast units and filtration strips that allow water to drain through defined joints and voids in the surface.
22	Sealed paving (including concrete and asphalt)	Paved Surfaces	0.0	Impervious paving constructed of concrete, asphalt or sealed paving units that do not allow water to percolate through the surface.

**Correct as at time of publication. As the framework is new some information may be subject to change. Any updates will be published via the Green infrastructure and biodiversity TAN which applicants should refer to.*
***Canopy measurements should be based on their extent on maturity or 25 year growth*

APPENDIX 4.2 - BIODIVERSITY POINTS

In line with the requirements set out in Policy G5, applicants are expected to incorporate a selection of features as part of the design of their development to support local species. Applicants should select features from the biodiversity points list in line with the below requirements, moving through pots 1 to 3 in order.

Type of application	Pot 1 Mandatory requirements	Pot 2 Shelter and movement features	Pot 3 Supporting landscape features

		requirements	**requirements**
Householder	All mandatory features (where applicable)	N/A	N/A
Minor development	All mandatory features (where applicable)	1 feature	1 feature
Major development	All mandatory features (where applicable)	2 features	2 features

The policy requires that biodiversity features selected to secure the required points for an application are clearly demonstrated on related landscape/elevations plans submitted as part of the application. Requirements/design specs. The biodiversity points list is included below, however, the intention is for this to be kept as a 'live list' updated and/or added to throughout the lifetime of the Local Plan, therefore, the Green Infrastructure and Biodiversity Technical Advice Note should be referred to for the most up-to-date version where appropriate (along with additional guidance on the requirements of the list).

Biodiversity feature	**Priority areas in Oxford**	**Additional details to be provided in Technical Advice Note**
Pot 1: Mandatory requirement - Household/Minor/Major		
At least one swift box or swift brick	If within an identified swift hotspot	Mapping and general guidance on location/maintenance of boxes
At least one bat box	If within 200m of rivers/ woodland	Mapping and general guidance on location/maintenance of boxes AND licensing requirements
Pot 1: Mandatory requirement - Minor/Major		
At least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential), including consideration of building-dependent species.	City-Wide	General guidance where needed.
At least one bat box for every five dwellings (resi) or per 2000m2 footprint (non-residential)	City-Wide	General guidance where needed.
Choose two of the following: insect hotel, planting for pollinators, night-flowering species	In valuable areas/corridors identified in the TAN	Mapping and general guidance on species choice
Pot 2: Shelter and movement features for wildlife		
Hedgehog highways in new boundary fencing	City-wide	General guidance where needed.
Reptile hibernacula in suitable location	City-wide	General guidance where needed.
Amphibian hibernacula in suitable location	City-wide	General guidance where needed.
At least one insect hotels per dwelling	City-wide	General guidance

(residential) or per 1000m2 footprint (non-residential)		where needed.
Provision of at least one dark corridor through the site	City-wide	General guidance where needed.
Pot 3: Supporting landscape features for wildlife		
An appropriate amount of the trees and bushes on the site bear fruit/ berries and/or nuts	City-wide	General guidance where needed.
An appropriate amount of vegetation provides a range of food and host plants for local invertebrate populations	City-wide	General guidance where needed.
Suitable size freshwater pond(s) designed to support aquatic species (no fish or invasive plant species)	City-wide	General guidance where needed.

APPENDIX 5 – CARBON/RESOURCES

APPENDIX 5.1 - ADDITIONAL EXTERNAL GUIDANCE ON NET ZERO CARBON DESIGN

Guidance around designing buildings to net zero carbon standards is constantly evolving, however, there are a number of useful resources that can support applicants in designing buildings in ways that reduce their carbon footprint. Whilst the following are not Council resources and should be treated as independent, the below is a list of some external reference sources which may be helpful in implementing the requirements of policies R1, R2 and R3 of chapter 5:

- Low Energy Transformation Initiative (LETI)
- UK Green Building Council (UKGBC)
- Royal Insititute of British Architects (RIBA)
- Climate Change Committee
- Historic England -- retrofit and energy efficiency guidance for historic buildings
- UK Net Zero Carbon Buildings Standard

A fuller list of guidance will be kept updated within the Energy and Carbon Technical Advice Note.

APPENDIX 6 – DESIGN AND HERITAGE

APPENDIX 6.1 - CONSERVATION AREAS

Oxford has 18 Conservation Areas at present. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. See all conservation areas on a map. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. It is the protection of these elements that need to be properly managed, ensuring future generations will value and enjoy their special qualities. Oxford's Conservation Areas:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

APPENDIX 6.2 - HEALTH IMPACT ASSESSMENT PROCESS

Health Impact Assessment

A Health Impact Assessment (HIA) is a tool used to identify the health impacts of a plan or project and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities. By bringing such health considerations to the fore, HIAs add value to the planning process.

When is a Health Impact Assessment required?

Policy HD10 requires that a HIA is undertaken for major development proposals (e.g. 10 or more dwellings or 1000m² or more of non-residential development).

How to undertake a Health Impact Assessment?

The Council recommends that applicants refer to the Health Impact Assessment toolkit created by Oxfordshire County Council for resources and guidance on completing a HIA,

which is available on their website[1]. The scope of the assessment, extent of stakeholder engagement, as well as use of alternative HIA methodologies should be discussed and agreed with the relevant case officer to ensure a proportionate approach to the HIA is taken.

Whilst the specific details of what to include in the HIA will vary with the nature of the development, the HIA methodology should usually be structured into five key stages, which are outlined in greater detail in the Oxfordshire HIA toolkit:

1) Description of the proposed development;
This will need to include a description of the physical characteristics of the site of the proposed development site and surrounding area, including the current use.

2) Identification of population groups affected by the development;
Most proposals will not affect all individuals or groups across a community in the same way, so consider which groups of the existing population would be affected by the proposed development.

3) Identification of geographical area and associated health needs and priorities;
Identifying localised health priorities will enable a HIA to focus on the key issues for a particular location of a development, ensuring any HIA submitted to a Planning Authority is targeted and appropriately scoped so that it provides the most benefit. The expectation set out in Policy HD10 is that analysis on health trends set out in the HIA is supported by appropriate evidence/data - for example from local health statistics.

4) Assessment of health and recommendations; and
A series of assessment tables should be completed for each of the health priorities identified as relevant to a proposed development guiding the reader through the process of establishing a baseline of the existing situation, building an evidence base around health impacts associated with a health priority, and identification of likely effects (positive and negative), and the population groups likely to experience these effects. The policy requires that mitigation measures are identified that can address any identified negative effects and these should be presented as part of this assessment.

Typical health priorities likely to be affected by a proposed development could include: Housing, Physical activity, Healthy food environments, Air quality, Noise, Traffic and Transportation, Crime and anti-social behaviour, Economy and Employment, Education and Skills, Local natural environment and access to green spaces, and Access to Services.

5) Monitoring.
The HIA should set out where the applicant will undertake monitoring in relation to the findings of the HIA. These should be linked to the proposed mitigation measures identified to address negative impacts from the development identified by the assessment and be S.M.A.R.T.

Please refer to both our Technical Advice Note and the online Oxfordshire Health Impact Assessment Toolkit for further information on how to complete a thorough HIA for major development in Oxford.

APPENDIX 6.3 - PRIVACY, DAYLIGHT AND SUNLIGHT: THE 45 AND 25 DEGREE GUIDELINE

Many factors are significant in assessing whether new dwellings will enjoy adequate sunlight and daylight, both internally and externally, and the same factors must be taken into account when assessing the impact of new development on existing dwellings. Reflected light and the amount of sky visible affect daylight within a room or garden. Applicants must consider the function of the room or that part of the garden, and also whether other windows serve the affected room. Existing features including boundary walls, trees, proposed buildings and any change in ground level between sites are all relevant factors that also need to be taken into account. Applicants must also consider the impact on outlook - it is important not to create conditions that are overbearing (oppressive or claustrophobic) for existing or future occupiers. While development proposals will be considered in the light of these factors, as a guideline to assess their impact on daylight, sunlight and outlook, the City Council will use the guidelines illustrated below. In normal circumstances, no development should intrude over a line drawn at an angle of 45° in the horizontal plane from the midpoint of the nearest window[2] of a habitable room and rising at an angle of 25° in the vertical plane from the sill. If a main window to a habitable room[3] in the side elevation of a dwelling is affected, development will not normally be allowed to intrude over a line drawn at an angle of 45° in the vertical plane from the sill.

Example 1 A single storey extension as shown below is generally acceptable if the projection is limited as shown in Plan (A). It may not be acceptable if the projection intrudes beyond the 45° line as shown in Plan (B)

Example 2 If the 45° rule is broken, generally the proposal will still be acceptable if the line drawn outwards at 45° is tilted upwards at 25° from the sill level, and is unbroken by the highest part of the extension. This is shown as Drawing (C). The example shown as Drawing (D) is unlikely to be acceptable.

Example 3 If a main window to a habitable room in the side elevation of a dwelling is affected, development will not normally be allowed to intrude over a line drawn at an angle of 45° in the vertical plane from the sill.

APPENDIX 7 – COMMUNITIES

APPENDIX 7.1 - MARKETING EXPECTATIONS

A property should be marketed for its existing use as a public house or live performance venue for a minimum period of at least 12 months, or for any other cultural or visitor attraction for its use or a use that meets similar needs.

The applicant should then submit a supporting statement to accompany a planning application for a change of use that contains evidence to confirm the length of time the site has been marketed for; details of the agent used; information to show where this marketing has taken place for example in the local press, through signs on site, on the internet and/or in journals or publications used by the trade.

The statement needs to confirm the price the property was advertised for to show that it has been pitched at a 'reasonable' rate to generate interest from potential operators. Finally there needs to be a summary of the interest received and the reasons why offers have not been accepted.

APPENDIX 7.2 - TRANSPORT ASSESSMENTS

Where a Transport Assessment (TA) is required for a development proposal, it should be submitted alongside the planning application. The City Council may agree to the scope of TA being reduced if the development proposal is in a suitable location and in line with planning policy. TAs should address the desirable modal split and provide for a package of measures designed to reduce the role of car travel to the site. If the potential modal split is difficult to predict, the TA will need to consider whether and how far it may vary. The TA should be easy to understand for non-technical people.

Thresholds

The Transport Assessment will generally be required if the development:

a. is likely to generate car traffic, particularly at peak times, in an already congested or heavily trafficked area;
b. is likely to introduce a new access or additional traffic (any mode) onto a trunk road or other dual carriageway;
c. is likely to generate significant amounts of traffic in or near the city centre air quality management area (AQMA);
d. is for a new or expanded school facility; and
e. would be refused on local traffic grounds but where mitigation measures can be implemented to overcome any adverse impacts

Proposals over the following thresholds will require a detailed TA:

Food retail 1,000m2
Non-food retail 1,000m2
Leisure 1,000m2
Cinemas and conference facilities 1,000m2
Stadia . . . . . 1,500 seats
Offices 2,500m2
B2 industry 5,000m2
B8 distribution and warehousing 10,000m2
Hospitals 2,500m2

Higher and further education 2,500m2
Residential . . . . . 40 dwellings
Freight movements . . . . . .10 per day

For mixed-use schemes, a detailed TA will be required where the combined effect of the uses proposed exceeds 10 freight or 200 vehicle movements a day, based on the general assumption that 100 vehicle movements are generated by 500m^2 commercial floorspace or 20 dwellings.

Proposals over 500m^2 or which may generate over 100 vehicle movements or 5 freight movements per day will require at least a transport statement. For residential development in Oxford, this equates to developments of 20 dwellings or more.

Contents

All TAs and TSs must include a non-technical summary and must address:
a. location and layout including access and egress points;
b. size, in terms of site area and floorspace per activity; and/or number of dwellings and number of bedrooms per dwelling; and use of the site eg. staff, students, patients, visitors;
c. proposed uses and activities; and
d. issues such as timing and type of access requirements

Where a detailed TAs is required, this must additionally address the following:
a. Potential travel characteristics: accessibility by all modes and predicted modal split. TA should consider ease of access and catchment areas by travel-to-site times for each mode.
b. Measures: influencing travel patterns and minimising the need for parking using measures to improve access by walking, cycling or public transport in order to minimise non-essential car travel. TA should consider appropriateness of location, scale, density and uses of the site and development.
c. Impact appraisal and mitigation: maximising accessibility by sustainable transport modes such as through minimising prominence of car parking, management of access and parking, and organisational policies. TA should determine whether the development is acceptable or not in terms of the transport impacts, and propose measures to mitigate the impacts in terms of accessibility, integrating modes of travel, reducing environmental impact and promoting safety.

APPENDIX 7.3 - TRAVEL PLANS

If a Travel Plan (TP) is required for a development proposal, it should be submitted with the planning application.

Thresholds

TPs must be submitted alongside planning applications if the development:
a. is likely to generate significant amounts of travel in or near the city centre air quality management area (AQMA);
b. is for new or expanded school facilities; and
c. would be refused on local traffic grounds but where the TP sets out to overcome any adverse impacts.

Proposals over the following thresholds will require a TP:
Food retail . . . . . 1,000m^2

Non-food retail . . . . . .1,000m^2
Leisure . . . . . .1,000m^2
Cinemas and conference facilities . . . . . .1,000m^2
Stadiums . . . . . .1,500 seats
Offices . . . . . 2,500m^2
B2 industry . . . . . .5,000m^2
B8 distribution and warehousing . . . . . .10,000m^2
Hospitals . . . . . 2,500m^2
Higher and further education . . . . . .2,500m^2

TPs must recognise the potential for modal shift and therefore the early stages of the TP are likely to focus on those car drivers “most able” or “most likely” to change their mode of travel. This does not mean that other categories should be neglected. Greater effort in terms of more measures will be needed in the longer term to address the needs of those less likely to switch from driving.

The reasons for car use, the distances travelled, and from where journeys start, and finish must be assessed. There are many ways that information could be assessed and represented in the TP.

For example, on a proposal to expand an existing site, surveys of current staff would be useful. For a relocated organisation, current staff surveys could indicate travel habits at the new site. An isochrone map can be useful in indicating distances from a site, accessibility by various modes, or potential catchment areas.

Modal split targets are normally displayed as percentages. However, this does not address the issue of rising staff numbers for example, and over time may in fact hide an increase in the number of cars being brought to a site. Targets should be stated as actual numbers as well as percentages.

Contents

There is no right or wrong way to present a useful and effective TP. However, the following guidelines should be considered:

Background:

Information about the organisation must be stated clearly, including:

a. Staff details such as numbers (for example, full-time/part-time, staff on payroll/fulltime equivalents[4]), times of travel (for example, Monday to Friday at 9am and 5pm or shift pattern), where they travel from, and how they currently travel;
b. Site assessment including current access and egress (pedestrian/cycle/vehicular) into and within the site, cycle facilities, accessibility by public transport, accessibility of nearby shops and services, and car parking;
c. Assessment of non-staff travel (for example, visitors, deliveries, fleet vehicles);
d. Attitudes of staff towards travel to and from the site and towards their travel needs.

Objectives:

The statement of objectives should identify the motivation behind the TP and clearly state its purposes. (For example, reasons for a TP include reductions in car usage (especially single occupancy journeys at peak times), and increased use of walking, cycling and public transport). It may be relevant to address:

a. Reducing traffic speeds, improved road safety and personal security (especially for people on foot or cycle); and

b. More environmentally friendly delivery and freight movements, including home delivery services.

Measures:

The TP must identify what needs to be done to achieve its objectives and what measures need to be implemented.

Targets:

Targets must be specific, measurable, realistic and split into identifiable time frames based on the short term, medium term and long term and preferably dated by month and year.

Monitoring and Review:

The effects of TPs must be monitored, and they must state clearly how monitoring will take place (for example by stating what will be monitored by whom and when). Baseline data must therefore be provided (for example, as part of the background information). The outcome of monitoring may suggest that a review of the measures and/or targets is necessary. (For example, it is not necessarily a bad thing to discover through monitoring that a measure is no longer feasible, but new measures will then need to be set to meet the objectives of the TP.)

Enforcement:

The TP must set out arrangements for appropriate enforcement action in case agreed targets are not met.

APPENDIX 7.4 - BICYCLE AND POWERED TWO WHEELER PARKING STANDARDS

Bicycle Parking Standards:

Residential:
Houses and flats up to 4+ bedrooms . . . . . 2 spaces per bedroom
HMO . . . . . 1 space per bedroom
Student Accommodation . . . . . .1 space per study bedroom
Hotel/Guest Houses . . . . . At least 1 spaces per 5 non-resident staff (or other people). Plus 1 space per resident staff

Non – Residential:
Shops other than non-food retail warehouses, financial and professional services . . . 1 space per 113m^2
Businesses . . . . . .1 space per 90m^2 or 1 space per 5 staff or visitors
Food and drink . . . . . 1 space per 40m^2 public floor space
Non-food retail warehouses including garden centres . . . . . .1 space per 400m^2
General industry warehousing/distribution traders' merchants . . . As B1 up to 235m^2 - 1 space per 5 staff or visitors
Places of assembly including cinemas, theatres, stadiums and concert halls . . . 4 spaces per 10 seats up to 1,000 seats; 1 space per 100 seats thereafter
Places of worship/community centres/public halls . . . 2 spaces per 20m^2 of seating/ assembly floor space
Libraries . . . . . .1 space per 200m^2

Medical clinics/dentists . . .1 space per treatment room plus 1 space per 5 staff or visitors
Hospitals . . . . . 1 space per 5 staff or visitors
Public sports facilities . . .1 space per 5 staff plus additional provision to be determined on its merits with the following guideline; 1 space per 105m^2
Nurseries and creches . . . . . .1 space per 3 staff or visitors
Primary schools . . . 1 space per 5 pupils as and 2 spaces per 5 members of staff and visitors
Secondary/schools . . . . . 1 space per 2 pupils - plus 1 space per 3 staff or visitors
Non-residential higher/further education . . . .1 space per 2 students (based on anticipated peak number of students on-site at any one time) plus 1 space per 5 staff

Other developments . . . To be treated on their individual merits, guided by the general principle of 1 space per 5 people

Bicycle parking provision should be made on the site. If there is a shortfall of on-site parking provision, a contribution may be sought towards off-site bicycle parking or associated facilities, based on the standards set out in this appendix.

The standards will be applied to ensure that there would be adequate provision if permitted development were carried out, unless applicants are willing to accept a condition restricting their permitted developments rights in this respect.

The reference to staff should be taken to mean the peak number of staff expected to be onsite at any one time, whether part-time or full-time.

The standards are intended as minimum standards for new development and where appropriate, change of use. One space means that one bicycle can be secured. A bike stand for example a Sheffield style stand, can provide two bicycle-parking spaces.

Bicycle parking should be future proofed to ensure that the infrastructure to support the charging of electric bicycles is supported.

Powered Two Wheeler Parking Standards:
Residential . . . . . .1 space per 5 dwellings
Non-residential developments . . . 1 space per 400m^2 up to 2000m^2, 1 space per 1000m^2 thereafter

APPENDIX 7.5 - SHOWER, CHANGING ROOM AND LOCKER FACILITIES PROVISION IN COMMERCIAL/NON RESIDENTIAL DEVELOPMENT

The City Council will seek the provision of shower, changing and locker facilities in commercial/non residential developments on the following basis:
Office . . . . . 1 shower per 500m^2 up to 1000m^2, 1 shower per 4,000m^2 thereafter
Warehousing and retail warehousing . . . 1 shower per 5,000m^2 up to 10,000m^2, 1 shower per 8,000m^2 thereafter
Other . . . . . 1 shower per 2,500m^2 up to 10,000m^2, 1 shower per 4,000m^2 thereafter

The application of these standards will be subject to the merits of each proposal. Except where specified, all areas quoted refer to gross floor measured externally, I.e., where proposals are submitted to extend, consolidate or reconfigure an existing site, these

standards may be applied to the site as a whole rather than just the additional floor space, to ensure adequate provision on site.

APPENDIX 7.6 - VEHICULAR PARKING STANDARDS

Vehicular parking standards:

Policy C8 sets out Oxford City Council's policy on providing parking for new residential developments. The standards below should be read alongside Policy C8 and the supporting text.

Any dwellings*1 space per dwelling (may be allocated or unallocated) to be provided within the development site

Houses in Multiple Occupation Parking standards to be decided on a case-by-case basis.

Wheelchair accessible or adaptable houses and flats . . . 1 space per dwelling, to be provided on-plot must be designed for wheelchair users in accordance with Part M of Building Regulations)
Retirement homes . . . . . 1 space per 2 residents' rooms
Sheltered/extra care homes . . . . . 1 space per 2 homes plus 1 space per 2 staff
Nursing homes . . . . . .1 space per 3 residents' rooms plus 1 space per 2 staff
Student accommodation . . . . 0 spaces per resident room. Operational parking and disabled parking to be considered on a case-by-case basis in accordance with Policy H10

*Any parking provided on plot to be excluded from a permit for any future CPZ and only 1 permit to be provided per dwelling on street when not provided on plot.

Disabled Parking/Blue Badge Holders:

On developments of 4 or more homes, wheelchair accessible or adaptable homes should provide allocated for blue badge holders/disabled parking, irrespective of location. On sites of 20 or more homes blue badge holders/disabled parking should be provided for at least 5% of dwellings. Disabled parking should have level access to, and be within 50 metres of, the building entrance which it is intended to serve.

Low car parking standards for working drivers, pooled cars/car clubs and visitor spaces:

0.2 car parking spaces per 20 units should be provided on site for working drivers, service and delivery vehicles, pooled cars/car clubs and visitor spaces. For sites which are constrained evidence must be submitted to satisfy the local planning authority as to why this threshold should be reduced.

Non-residential development:
Existing employment uses . . . . . No additional increase in parking spaces
All other uses . . . To be determined through pre-application meetings/planning applications in the light of their Transport Assessment and Travel Plan

Oxford Local Plan 2042

Interim Sustainability Appraisal report – non-technical summary

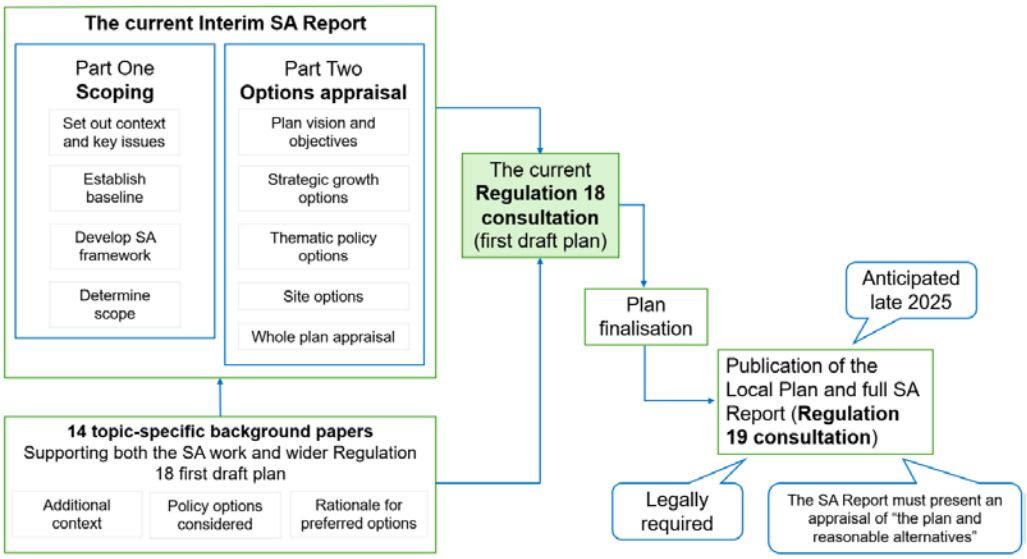
1. Introduction

1.1 The Oxford Local Plan 2042 will update the Oxford Local Plan 2036. It will allocate sites for housing, employment and other uses, and provide policies to manage development in the city. It will need to include measures to improve public transport, protect and enhance the natural and historic environment, reduce carbon emissions, and protect against flooding. It will be used to make decisions about planning applications.

1.2 The environmental, social and economic impacts of Local Plans must be assessed through Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). SA/SEA aims to ensure that the decisions taken in the context of the Local Plan's preparation are made in the knowledge of all likely sustainability effects of the proposed policies and reasonable alternatives, seeking to minimise negative impacts and maximise positive ones. The Oxford Local Plan 2042 SA process incorporates the requirements of SEA within them, and any reference to the Sustainability Appraisal/SA should be taken as also including the Strategic Environmental Assessment/SEA where relevant.

1.3 Sustainability Appraisal is an iterative process that aligns with the various stages of the Local Plan's development. This interim report, accompanying the Regulation 18 consultation, is divided into two parts, (as per Figure 1.1), which cover the scoping stages (Part 1) and the development and testing of emerging options/alternatives for the Local Plan 2042 (Part 2). They are supported by a range of topic-specific background papers.

Figure 1.1. The interim Sustainability Appraisal and the wider Local Plan preparation process



1.4 Together, parts 1 and 2—collectively referred to as the 'interim Sustainability Appraisal report'—set out how the Council has undertaken work associated with the formal SA process stages A and B (Tasks A1-A5 and B1-B3), as set out in Table 1.1.

Table 1.1. The Sustainability Appraisal (SA) process and expected stages of Local Plan 2042 preparation

Stages of the Sustainability Appraisal process	**Relevant consultation**
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: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft to agree scope (Feb-March 2025) **Complete** Updated version published as Interim SA Report Part 1 for Summer 2025 Reg 18 consultation **Current stage**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as Interim SA Report Part 2 for Summer 2025 Reg 18 consultation **Current stage**
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 SA report*	Will be published as part of late autumn 2025 Reg 19 consultation, also including updated information related to earlier stages where necessary

Stage D: Seek representations on the SA report from consultations and the public	
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

* *The Environment Agency, Historic England and Natural England*.

2. Methodology

2.1. Process for undertaking and structuring the Reg 18 Sustainability Appraisal

2.1 The Sustainability Appraisal process has been carried out throughout the preparation of the Regulation 18 consultation document and has been integral to developing the preferred approaches set out in the Regulation 18 consultation first draft Local Plan 2042.

2.2 As per Figure 1.1 and set out in the introduction, the interim Sustainability Appraisal report is divided into two parts, which cover the following stages:

- **Part one** - comprises the scoping stages including: a review of relevant policies, plans and programmes and sustainability objectives; collection of baseline information informing the sustainability context; identification of key issues and problems; and development of the SA/SEA framework.
- **Part two** – comprises the appraisal of options for the Local Plan and the testing of the approaches that are set out in the Regulation 18 document, including: the themes/objectives which support the wider vision; the overarching growth strategy preferred option and alternatives; options for policies with likely significant effects; as well as detailing the process being carried out for identifying site allocations. Some high-level testing of the overall Local Plan, based upon preferred approaches presented in the consultation, is also carried out.

2.2. Scoping and evidence gathering including relationship with background papers

2.3 Scoping and evidence gathering of the existing situation in the city, key sustainability issues and wider challenges has been undertaken and will be kept under review. The Council has sought to confirm the scope was appropriate through early engagement, including sharing the draft scoping report, with the statutory national bodies

Historic England, Natural England and the Environment Agency. This has helped to inform the context which the emerging policy framework must respond to, including the vision/themes/objectives for the Local Plan and the range of policies being proposed. It has also helped to establish the assessment framework (made up of 12 SA criteria) that will be used throughout the SA testing on the Local Plan as it emerges.

2.4 Alongside the main SA report, a series of background papers have been prepared, covering a range of specific topics such as housing need; flood risk; green infrastructure; and transport. These papers play a dual role that integrates with the SA work by:

- Expanding on and providing additional detailed information supporting the analysis for each of the SA scoping stages, with the background papers all following a consistent structure, with sections including relevant policy context; current situation; and likely future without a new Local Plan, that align with the scoping tasks in the SA report part 1.
- Helping to detail the rationale for coming to the preferred options presented in the Regulation 18 consultation document for each topic. This includes a section setting out particular alternative options for Local Plan policies that were considered, alongside the pros and cons that were weighed up before selecting the preferred option (which is then detailed in the main consultation document).
    - Some of the options sets were also appraised through the SA report part 2, and the findings from these appraisals feed back into the rationale presented in the background paper for coming to a preferred option.

2.5 Additionally, preparation of the Local Plan requires various pieces of evidence addressing topics such as housing need, water cycle, green belt and employment land, with additional evidence being gathered as the city moves forward towards preparing a submission draft Local Plan (the subject of the Regulation 19 consultation later in 2025). Where relevant, the findings from this work are incorporated into relevant parts of the sustainability appraisal's scoping work.

2.3. Appraising different elements of the Local Plan 2042 as it emerges

2.6 With the scoping work forming the fundamental basis for informing the assessment process, the Interim Sustainability Appraisal has then helped influence the many choices which need to be taken around particular options that the Local Plan could take. The Part two report presents the testing that has influenced overarching approaches to growth which the Local Plan 2042 strategy could pursue (e.g. focus on boosting housing or growing the economy), as well as testing of options for particular policies which could result in significant effects. Whilst the SA process and the results of the various testing

undertaken within it is not the only factor determining the preferred approaches for the Local Plan, it does identify the key sustainability impacts of particular decisions which need to be weighed up in coming to a preferred approach.

2.7 The Regulation 18 consultation presents an early picture of what the Oxford Local Plan 2042 could look like, including preferred approaches for policies, however, there are areas where the detail is still emerging, such as for site allocations, and some specific elements of other policies. As an example, the potential site allocations have been subject to an early appraisal using the site-specific SA framework, with proformas created for each site that begin to identify particular sustainability impacts or concerns that could arise from an allocation. The process for this is documented in part 2 also. As the detail of site allocation policies emerges going forwards, these assessments will need to be reviewed, and equally, the findings from the assessments will need to feed into the specific detail of the allocations (e.g. where particular mitigations are identified as necessary to address identified impacts). Feedback from the regulation 18 consultation may also indicate areas where the SA work needs to be reviewed and updated.

2.8 As such, the Interim Sustainability Appraisal has been undertaken based on available information. The SA/SEA process will continue alongside the development of the Local Plan and a fuller report will be published as part of the Regulation 19 consultation (as shown in Figure 1.1). This will also fulfil later stages of the SA process, such as identifying in greater detail any necessary measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects; as well as setting out a monitoring framework.

3. Sustainability Appraisal Report - Part one

3.1 The following sections summarise the key elements of part one of the Sustainability Appraisal, which encompasses the scoping stages of the Sustainability Appraisal process (Stage A, tasks A1-A5 as set out in Table 1.1).

3.1. Policy context

3.2 The National Planning Policy Framework (NPPF) requires local authorities to deliver enough homes, build a strong economy, support non-car travel, protect the Green Belt, support good design, deal with climate change, and protect nature and heritage. This is underpinned by various pieces of online guidance in the Planning Practice Guidance, as well as specific guidance in relation to design via the National Design Guide and Model Design Code. The Environment Act 2021 will require development to deliver at least 10% biodiversity net gain.

3.3 The Levelling Up and Regeneration Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes. Many of the changes provided for in the legislation are dependent on subsequent regulations, including replacing SA/SEA with "environmental outcomes reports", setting up national development management policies that would apply to all local authorities, and removing local authorities' duty to cooperate with neighbouring authorities.

3.2. Sustainability context and existing problems

3.4 The city of Oxford is a compact one, with areas of dense urban development, interspersed by areas of natural green space and various blue corridors such as the rivers, streams and canal that interweave them. The city has arisen from a long history of settlement that has given rise to a wealth of historic assets, and the city also hosts a hierarchy of important ecological habitats of varying designations including the Oxford Meadows Special Area of Conservation, numerous Sites of Special Scientific Interest and other locally important sites. These natural and historic features play an important role in supporting tourism in the city, drawing many visitors. The presence of the rivers and urbanisation in many areas makes flood risk a particular concern in many areas of the city; the impacts of climate change are likely to exacerbate this as well as other risks such as overheating.

3.5 The population of the city skews particularly to younger age groups and hosts a significant student population due to the two universities. Whilst there are areas of wealth, there are also areas characterised by high levels of deprivation and inequalities are a significant challenge in relation to health and wellbeing, as well as skills and access to jobs for some residents. Constraints on the city make space for new development limited, this has various knock-on-effects, particularly for access to housing and housing affordability.

3.6 The adopted Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development, as well as new local aspirations such as the target of being a net zero carbon city by 2040. Also, there are ongoing challenges such as the continued housing crisis, the changing picture of retail, pressures on biodiversity and impacts of pollution on the environment from various activities which a new Local Plan needs to respond to.

3.7 Key problems in Oxford include:

- Oxford has very high housing costs, limited land available for housing, and difficulty in providing affordable housing.

- There are high levels of inequality across the city which particularly affect economic advantages for certain residents as well as health and wellbeing.
- Much of Oxford is prone to flooding: this is likely to increase with climate change.
- Oxford is still far from achieving its 2040 target of net zero carbon emissions.
- All of Oxford is an Air Quality Management Area because of transport pollution.
- Nature in Oxford, and nationally, is under pressure from climate change, air pollution, and development.
- Oxford is in an area of serious water stress and experiences ongoing challenges around water quality in its watercourses due to various sources of pollutants, although good progress is being made working with Thames Water and the EA on the issue of wastewater treatment, which is a key contributor.

3.3. SA/SEA Framework

3.8 This SA/SEA will use the framework at Table 1.2 to assess the impacts of the Local Plan 2042 policies. An adapted framework, with more site-specific criteria underlying each objective, is used for development sites.

Table 1.2: The SA/SEA framework used to assess the impacts of the new Local Plan policies.

SA/SEA Framework
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
5. To reduce poverty, social exclusion, and health **inequalities**.
6. To provide accessible essential **services and facilities**.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.
9. To achieve **water** quality targets and manage water resources.
10. To conserve and enhance Oxford's **biodiversity**.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

3.9 The scoring matrix set out in Table 1.3 will be used for assessing various impacts throughout this report. The scoring highlights whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 1.3: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	++
Positive impacts (compared to the current situation)	+
Neutral / none	0
Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?

3.4. Early engagement with statutory bodies

3.10 The statutory bodies, Natural England, Historic England and the Environment Agency have reviewed and provided feedback on the early draft of the Part 1 report to help ensure that the scoping information and proposed SA/SEA assessment framework is appropriate. Amendments have been carried out to the main report as well as associated background papers in response to this feedback and a summary of how the Council has responded are documented towards the end of the Part one report.

4. Sustainability Appraisal Report - Part two

4.1 The following sections summarise what is covered in the Sustainability Appraisal report part two document, which addresses the development of options and alternatives for the Local Plan 2042. The Part two report is broken down into a number of sections that address different elements of the emerging Plan and respond to Stage B (tasks B1-B3) of the Sustainability Appraisal process as outlined in Table 1.1. The three key sections are as follows:

- Testing themes/objectives which support the wider vision
- Developing and testing local plan options
- Testing the emerging plan as a whole (preferred approaches as set out in the Regulation 18 first draft Local Plan)

4.1. Testing themes/objectives which support the wider vision

4.2 Informed by the scoping and evidence gathering across a wide range of topics, which are highlighted in the various background papers, the Oxford Local Plan 2042 is guided by the following vision:

In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.

4.3 This vision is underpinned by 6 themes which have been adapted from the three pillars of sustainability (society, economy and environment) and the areas of overlap between them. These 6 themes are then supported by a number of more specific Local Plan objectives which respond to key aspirations, issues and challenges in the city as is highlighted in Table 1.4.

Table 1.4: The six Local Plan 2042 themes and underlying objectives

Local Plan 2042 theme	Underlying Local Plan 2042 objectives
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient	• Secure strong, well-connected ecological networks and net gains in biodiversity.

to climate change.	• Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Demonstrate we value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

4.4 The six themes and the underlying objectives within them, are central to achieving the overall Local Plan vision. To help understand how these perform against the SA framework and identify where there could be potential conflicts, these have been assessed against the twelve Sustainability Appraisal Objectives to identify where there is potential for positive/negative/neutral or uncertain impacts.

4.5 There are a significant number of areas where the themes represent positive or significant positive impacts in relation to the SA objectives suggesting good compatibility, whilst in other instances, the themes could produce negative or less certain impacts against particular SA objectives and potentially suggest conflicts which may need to be managed.

4.6 The six themes will work together as a whole, and identified positive or negative impacts in one theme need to be considered in the balance with the impacts arising from other themes. The benefit of the testing is in helping to understand where there is potential for impacts that may need to be explored further as the additional detail of the Local plan strategy and its policies emerges, as is the focus of the following sections.

4.2. Developing and testing Local Plan options

4.7 The Part two report then explores options / alternative approaches in respect of policy responses to the objectives set out above, with a focus on key policy areas in order to ensure that the SA focuses only on 'significant effects', which are as follows:

- The Local Plan growth strategy
- Select thematic policy areas
- Site allocations

4.2.1. The Local Plan growth strategy

4.8 Oxford has many constraints such as flood plain, designated sites of ecological importance, and designated heritage assets which limit the amount of available land over which growth can occur within the city's tight administrative boundaries.

4.9 Six growth strategy alternatives have been identified and appraised (Table 1.5), each involving a different approach to balancing housing and employment, as well as wider development needs alongside other Local Plan objectives. Specifically, the growth strategy alternatives are framed around two key questions: 1) should the focus be on balancing development needs with wider Local Plan objectives or, alternatively, fully maximising the development capacity of sites whilst minimising requirements for other provisions like

open space or greening (with a distinction between brownfield and greenfield sites); and 2) should the focus first be on meeting housing needs or employment land needs. The preferred approach in the emerging Local Plan is a balanced one that has a focus on providing for housing.

Table 1.5: Growth strategy alternatives considered for Local Plan 2042.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (Preferred option)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

4.10 The growth strategy alternatives have been appraised using the SA framework as discussed earlier (Table 1.2). The results of the appraisal are set out in Table 1.6 and serve to indicate that Option 1a, (the preferred approach for the Local Plan 2042), potentially performs most sustainably, in that it is associated with the most positives and fewest negatives. However, it is recognised that a case could be made for options 2b, 3a and 3b from either a housing (option 3a), or an economic growth perspective (options 2b and 3b), were it to be the case that particular 'weight' is placed on one or both of these objectives, and were the Council to accept a considerable cost in terms of wider objectives.

Table 1.6: Summary of appraisal results for Local Plan 2042 growth strategy alternatives

SA Objective	**Option 1A**	**Option 1B**	**Option 2A**	**Option 2B**	**Option 3A**	**Option 3B**
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?
6. Services and facilities	+/-	+	+/-	+	-	-
7. Green infrastructure, leisure and recreation	+	+	+/-	+/-	--	--
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--
9. Water	+/-	+/-	-	-	--	-

10. Biodiversity	**0**	**0**	**0**	**0**	**-**	**-**
11. Good urban design / the historic environment	**+**	**+**	**--**	**--**	**--**	**--**
12. Economic growth	**+**	**+**	**+**	**++**	**+**	**++**

4.11 Overall, at the current time, the Council is of the clear view that Scenario 1a best represents sustainable development on balance, but there will be the potential to revisit this conclusion in light of consultation responses and ongoing evidence gathering.

4.2.2. Testing policy options with likely significant effects

4.12 The identification of various policy options has been undertaken to help inform the preferred approaches to the 40+ draft policies set out as part of the Regulation 18 first draft Local Plan. Background papers document the options and alternatives considered for each of the draft policies set out in the consultation.

4.13 During the process of considering options for the policies, officers have considered various factors which might arise from taking forward a particular option, these have been illustrated as pros and cons and presented in the background papers.

4.14 Part of officers' considerations for which approach to take forward were the sustainability impacts of the options, which were considered at a high level using the 12 SA objectives to guide thinking. Some of the options sets were considered to have likely significant effects against one or more of the SA objectives and these were scoped into the Sustainability Appraisal and subject to a detailed appraisal to more fully understand how the options performed in sustainability terms.

4.15 These appraisals are presented in the part two report in a summarised form and more fully in the Appendix. The 'scoped in' options sets are as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

4.16 The findings from these appraisals contributed to the decision about preferred approach for these policies and were helpful in informing where potential mitigations might be needed to ensure the overall strategy was as sustainable as possible. The background papers each set out in their conclusions section how the Council came to identify its preferred options for policies and, for the 'scoped in' policies above, this draws on the testing that was undertaken as part of the Sustainability Appraisal (though it may not have been the only factor).

4.2.3. Developing site allocations

4.17 The Regulation 18 consultation does not set out policies for site allocations or areas of focus (which are broader areas where change is anticipated over the Plan period resulting from new development), however, these will be included as part of the Regulation 19 stage. The Regulation 18 consultation does identify at a high-level the potential allocations/areas of focus which the Council is considering.

4.18 Identifying and developing site allocations is an iterative process that draws from multiple areas of work. Housing/mixed use sites for development in the city are informed by the Strategic Housing Land Availability Assessment (SHLAA) process, meanwhile the Employment Land Needs Assessment (ELNA) helps to inform the approach to employment allocations.

4.19 The Council is following a 'no stone left unturned' approach as it seeks to identify as many allocations for development as possible in order to meet identified need for the city. This includes initially identifying a large list of potential sites from a wide range of sources. These potential sites are then assessed and filtered with consideration of their availability for development (e.g. landowner intent) and suitability for development (bearing in mind fundamental environmental constraints) which results in a refined list of potential allocations.

4.20 This refined list is assessed against a modified version of Sustainability Appraisal Framework Draft which considers sustainability impacts against the 12 SA objectives. An individual SA site assessment proforma has been completed for all potential allocations referenced in the Regulation 18 consultation and these are published separately. The SA proforma helps to identify where an allocation could have particular sustainability concerns (e.g. proximity to a watercourse, or sensitive heritage asset) and will help to ensure that allocations incorporate sufficient mitigation expectations within the policy, if this will be necessary to avoid likely significant effects in relation to the SA objectives.

4.21 As subsequent detail about site allocations continues to be developed in preparation for the Regulation 19 consultation, the SA site assessment proformas will be

revisited and updated to reflect new information or changes in context. These will be republished at Regulation 19 stage.

4.3 Testing the emerging plan as a whole (preferred approaches as set out in the Regulation 18 first draft Local Plan)

4.22 The final element of the Part two report draws together the findings from the preceding sections and looks at the wider list of preferred options for policies included in the Regulation 18 first draft Local Plan.

4.23 A high-level interim appraisal against the 12 Sustainability Appraisal objectives is presented for the emerging whole plan. Discussion is presented against each of the 12 objectives including some initial commentary around where particular mitigation measures are being incorporated to address potential negative effects, such as policy mitigation like net zero carbon policy to address carbon emissions impacts.

4.24 As the Local Plan continues to emerge and move towards a full submission draft Plan later in 2025, the whole plan appraisal will need to be kept under review and updated to reflect new information coming forward (particularly in relation to sites). The appraisal, as with the rest of the report, will need to be reviewed in light of the feedback from the Regulation 18 consultation also.

5. Next steps

5.1 The Sustainability Appraisal including scoping work will be reviewed as the full submission draft Local Plan is prepared. A full Regulation 19 Sustainability Appraisal will be published alongside the submission draft Local Plan, which will include additional information including in relation to required mitigations to address likely significant effects as well as proposed monitoring mechanisms. Feedback from the current consultation will help to inform the Regulation 19 Sustainability Appraisal stage.

Oxford Local Plan 2042

Interim Sustainability Appraisal report - Part one (Scoping)

1. Introduction 2
1.1. Background to Oxford City 2
1.2. The Oxford Local Plan 2042 3
1.3. Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) 4
1.4. Habitat Regulations Assessment 9
1.5. Health Impact Assessment 9
1.6. Difficulties in compiling the SA/SEA 10
1.7. Structure of this report 10
2. Policy context (Sustainability Appraisal Task A1) 12
2.1. National context 12
2.2. Regional context 14
2.3. Local context 16
2.4. Other Key Plans, Programmes and Environmental Objectives 17
3. Sustainability context (Sustainability Appraisal Task A2) 17
3.1. Current situation and likely future without a new Local Plan 17
3.2. Existing problems at areas of particular environmental importance 26
4. Identify key sustainability issues and problems (Sustainability Appraisal Task A3) 29
5. Develop the SA framework (Sustainability Appraisal Task A4) 36
5.1. The SA framework for plan objectives, alternatives and policies 37
5.2. The SA framework for sites 40
6. Feedback from the consultation bodies on the scope of the SA report (Sustainability Appraisal Task A5) 46
7. Conclusions 51

1. Introduction

1.1 This report, comprising Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) scoping, accompanies the Regulation 18 first draft Local Plan 2042 consultation. This chapter gives a high-level introduction to the city of Oxford; discusses the emerging Oxford Local Plan 2042, as well as the requirements of SA and SEA; and then sets out the structure of the rest of this scoping report.

1.1. Background to Oxford City

1.2 Oxford City Council is a district council at the heart of Oxfordshire. It has a total area of about 46 km^2 (17.6 miles^2), parts of which are very densely developed. The built-up area of the city extends to the administrative boundary around much of the eastern half of Oxford, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This uneven distribution of urban and rural landscapes gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre (Figure 1.1).

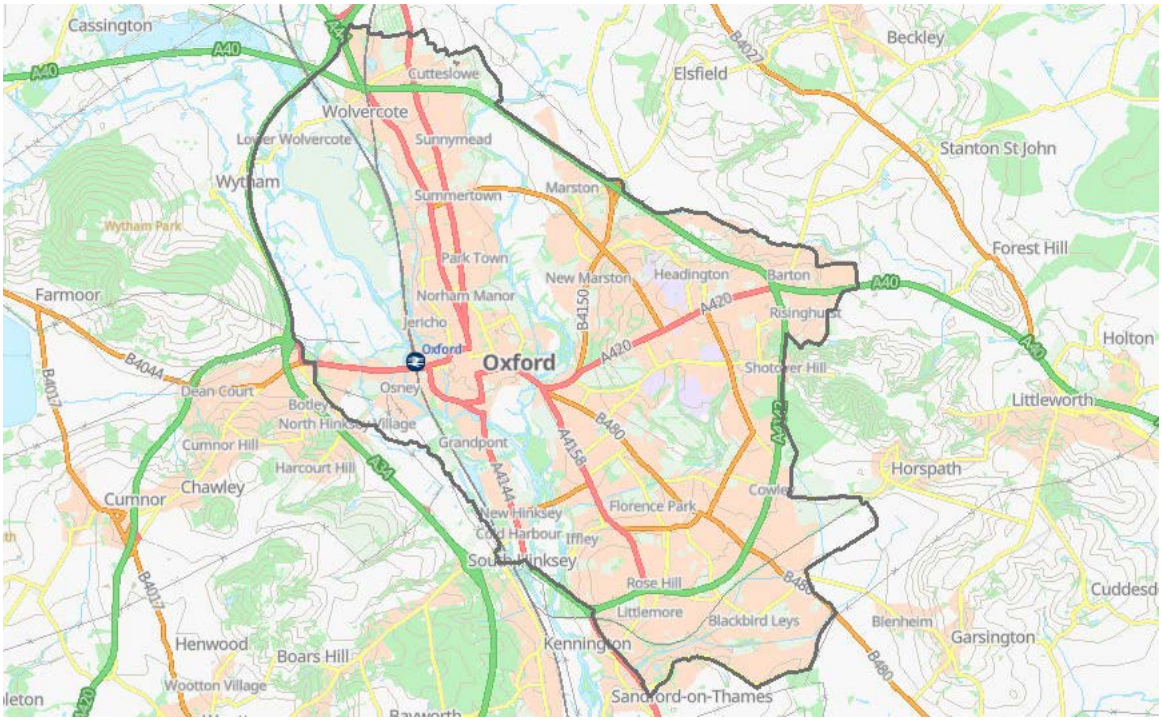


Figure 1.1: Map of Oxford including administrative boundaries of the City Council (© Crown Copyright and database right 2024. Ordnance Survey AC0000808820.)

1.3 Oxford's population is approximately 165,184 according to ONS mid-year population estimates for June 2023 (July 2024 release). The 2021 census estimated that one-third of the population is aged between 18 and 29, more than double the national

average. Oxford is home to 34,945 students, and 4,885 businesses providing 131,000 jobs. There is a high level of in-commuting in the city with the 2021 census recording that of the 57,315 commuters working in Oxford, 28,342 were from outside the city (*although the 2021 census data is likely to have been influenced by the Covid-19 lockdown measures including requirement to stay at home where possible*).

1.4 Oxford is a compact city with a unique and world-renowned built heritage which draws many visitors each year. 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 is an important contributor to the city's historic setting and, unusually, not only constrains development in the outer cordon of the city, but also through the city's heart. Oxford sits at the confluence of the Thames and Cherwell rivers and is quite flat, so it is prone to flooding from a range of sources. The rivers form an intrinsic part of the unique environment of the city and promote tourism and a range of important water-based sports and social activities in the city. 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, and a number of green spaces also contribute to the historic character of the city.

1.5 Oxford is one of the most unaffordable places to live in the country. In recent years, Oxford has experienced a booming housing market with rising house prices. 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.

1.6 Oxford has remained economically very successful despite the global recession of the 2000s, Brexit and the Covid pandemic. The government sees Oxford as playing a key role within the 'Pan-Regional Partnership' between Oxford and Cambridge, with high future housing and economic growth.

1.2. The Oxford Local Plan 2042

1.7 Following the withdrawal of the emerging Oxford Local Plan 2040 from examination in 2025, work is now commencing on the Oxford Local Plan 2042. For now, the currently adopted Local Plan 2036 will continue to be the key document containing statutory planning policies (alongside neighbourhood plans). A considerable amount of resource and effort went into the preparation of the withdrawn Local Plan 2040, including multiple rounds of consultation, and much of this forms an important basis informing the

approaches that will be set out in the Local Plan 2042. Equally, the process of preparing this new iteration of the Local Plan for examination will offer new opportunities to revisit and reappraise the policy framework that it will eventually establish.

1.8 The Local Plan 2042 will propose site allocations for housing and employment. It will also set policies for the management of development in the city including: the conservation and enhancement of the historic and natural environment, including biodiversity; guiding the quality of urban design; achieving the city's net zero targets and flood risk management. Ultimately, the Local Plan will be used in determining planning applications and helping guide investment decisions across the city.

1.9 Development of the Oxford Local Plan 2042 will be carried out over a number of stages as are set out in Table 1.1 Ultimately, the aim will be to submit the Local Plan for examination in 2026, after which the timetable is not within the City Council's control. Based upon the previous examination for the Oxford Local Plan 2036, the City Council expects the examination period to be around 15 months (from submission to adoption), this means that the new Local Plan would be expected to be adopted in summer 2027.

Table 1.1: Stages in the development of the Local Plan 2042

Stage	**Expected date**
Early engagement consultation	17th March to 28th April 2025
First draft Local Plan (Regulation 18) consultation	Summer 2025 (this consultation)
Pre-submission draft Local Plan (Regulation 19) consultation	Late autumn 2025
Submission of the Local Plan for examination	Spring 2026
Expected adoption of the Local Plan (subject to timings of examination)	Summer 2027

1.3. Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

1.10 The Environmental Assessment of Plans and Programmes Regulations 2004, SI No. 1633 (hereafter the "SEA Regulations") is the governing legislation in England and Wales that manages the Strategic Environmental Assessment (SEA) process. While the SEA legislation focuses on assessing environmental effect, this assessment process is widened to include an analysis of social and economic effects through the legal requirement to undertake a Sustainability Appraisal (SA) set out in Section 19 of the Planning and Compulsory Purchase Act 2004. According to the Planning Practice Guidance (PPG) section on Strategic environmental assessment and sustainability appraisal, "Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local

planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.

1.11 The SEA Regulations state that SEA must assess the likely significant effects of the plan or programme on the environment, namely:

- 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

1.12 There are various requirements of the SEA Regulations and Table 1.2 highlights these as well as where they are covered in the SA/SEA for the Oxford Local Plan 2042.

Table 1.2: Requirements of the SEA Regulations and where they are covered in the SA/SEA for the Oxford Local Plan 2042

Requirements of the SEA Regulations	**Where covered**
a) an outline of the contents, main objectives of the plan or programme…	Briefly in Sec. 1.2 of this part one report. Will be done in more depth in the SA/SEA report, once the plan has been further developed
… and relationship with other plans or programmes	Sec. 2 of this part one report, and in individual Background Papers
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sec. 3 of this part one report and in individual Background Papers
c) the environmental characteristics of the areas likely to be affected	Will be in the SA report, once possible development sites are defined
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 the Habitat Regulations;	In individual Background Papers, and summarized at Sec. 4 of this part one 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	In individual Background Papers

Requirements of the SEA Regulations	Where covered
environmental considerations have 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);	Discussed in the part 2 report sec 3 and 4. Will be expanded upon where necessary in the SA report at the Reg 19 consultation once the Local Plan is further developed
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;	Some initial discussion in part 2 report Sec 3 and 4. Will be expanded upon where necessary in the full SA report at Reg 19 consultation, once the Local Plan is further developed.
h) An outline of the reasons for selecting the alternatives dealt with…	Discussed in the part 2 report Sec 3.
… 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 1.6 of this part one report and will be revisited for the full SA report at the Reg 19 consultation.
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Will be in the full SA report at the Reg 19 consultation.
j) a non-technical summary of the information provided under the above headings.	See non-technical summary will be revisited for the full SA report at the Reg 19 consultation.
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)	This interim SA report, including scoping report, is the report put out for consultation at this stage. An early draft was also shared in early 2025 for feedback.
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).	This interim SA report is being published alongside the Reg 18 first draft local plan consultation. A full SA

Requirements of the SEA Regulations	Where covered
	report will be published alongside Reg 19 consultation.
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)	Will be carried out upon plan adoption
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Will be carried out from after plan adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	Throughout the process

1.13 Sustainability appraisal 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. Ultimately, the SA documents 'the story' of the Local Plan's development.

1.14 There are different requirements for undertaking an SA compared to those for SEA; the requirements for undertaking SA are outlined in Table 1.3 below. This SA/SEA report fulfils the legal requirements for both SA and SEA; where reference is made within this document to sustainability appraisal, it also implies (where appropriate) strategic environmental assessment.

Table 1.3 The Sustainability Appraisal (SA) process and expected stages of Local Plan 2042 preparation

Stages of the Sustainability Appraisal process	Relevant consultation

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: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft to agree scope (Feb-March 2025) **Complete** Updated version published as Interim SA Report Part 1 for Summer 2025 Reg 18 consultation **Current stage**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as Interim SA Report Part 2 for Summer 2025 Reg 18 consultation **Current stage**
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 SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Will be published as part of late autumn 2025 Reg 19 consultation, also including updated information related to earlier stages where necessary
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

** The Environment Agency, Historic England and Natural England.*

1.15 The colour coding system as set out in Table 1.4 will be used throughout this SA/SEA. It is intended to score whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 1.4: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	**++**
Positive impacts (compared to the current situation)	**+**
Neutral / none	**0**

Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?

1.4. Habitat Regulations Assessment

1.16 Oxford is home to part of the Oxford Meadows Special Area of Conservation (SAC), which is a site of international nature conservation importance because of its lowland hay meadows 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 naturally occurring sites in the UK for creeping marshwort.

1.17 A Habitat Regulations Assessment is a legal requirement to test if a plan or project proposal could have a significant impact on the conservation objectives of designated sites such as the SAC. In the Council's work on the Oxford Local Plan 2036, and on the withdrawn Local Plan 2040, the Council has produced Habitat Regulations Assessments and maintained regular engagement with Natural England throughout. This work previously identified that potential impacts on air quality, recreational disturbance, and changes to local hydrology/ water quality are all issues which require assessment through the Habitat Regulations Assessment process.

1.18 As well as continuing its close engagement with Natural England, the Council will be preparing an HRA to support the next stage of the preparation of the Local Plan, and the findings from the HRA will be used to inform the SEA/SA process.

1.5. Health Impact Assessment

1.19 Whilst there are no distinct legislative requirements to do so, the Council is also undertaking a separate Health Impact Assessment process on the Local Plan. This reflects the reality that planning and the built environment can have a significant role to play in shaping healthier environments (or hindering them) for people, which is particularly pertinent to Oxford, being a city characterised by health inequalities across its population.

1.20 This separate form of assessment is a valuable way of helping to identify the key positive and negative health impacts that could arise from proposed policies in the new

Local Plan. A scoping study will be undertaken to inform the Regulation 18 consultation, followed by a more detailed assessment of draft policies for Regulation 19.

1.6. Difficulties in compiling the SA/SEA

1.21 The evidence base underpinning the Local Plan will continue to emerge over the coming months as the policies of the plan are developed. It means that, whilst this scoping report has been undertaken using the most up-to-date evidence available, there are potentially some gaps or uncertainties at present. For example:

- As noted above, the Council will be preparing a new Habitat Regulations Assessment to accompany the Local Plan 2042 and any key findings/ implications for the Plan that relate to the SAC will need to be taken into account in due course. This will be published alongside the Regulation 19 consultation.
- An updated Strategic Flood Risk Assessment (SFRA) will be prepared in advance of the Regulation 19 consultation, particularly so that it can inform approach to site allocations. Although the Council is able to make use of the updated national flood risk mapping published in early 2025 in the meantime as well as previous SFRA evidence informing the Local Plan 2042.
- Additional work informing site allocations will be ongoing as these policies are prepared for the Regulation 19 consultation. Any information arising from assessments undertaken of the sites to inform the policies will be factored into the Regulation 19 SA report.

1.7. Structure of this report

1.22 This scoping report has been prepared by Oxford City Council. The aim of this SA scoping stage is to provide background evidence for subsequent stages of assessment. It comprises the 'Stage A' steps shown in Table 1.3, which are the subject of each of the following sections as follows:

- Section 2 – Relating to SA scoping Task A1: Identify other relevant policies, plans and programmes and sustainability objectives: "policy context"
- Section 3 – Relating to SA scoping Task A2: Collect baseline information: "sustainability context"
- Section 4 – Relating to SA scoping Task A3: Identify key sustainability issues and problems

- Section 5 – Relating to SA scoping Task A4: Develop the SA/SEA Framework
- Section 6 – Relating to SA scoping Task A5: Feedback from consultation bodies on the scope of the SA report

1.23 These sections are supported by more detailed analysis which is presented across 14 supporting Background Papers. The Background Papers expand on key information of relevance to Tasks A1, A2 and A3 for the various topics they address. Table 1.5 lists these papers, which can also be accessed via the evidence base online here [to be added at consultation], and shows how they relate to the sustainability appraisal objectives which will be discussed at Section 5.

Table 1.5: Background papers and SA objectives

Relevant background paper(s)	**SA objective**	**SEA Themes**
008 Carbon reduction and climate resilient design 012 Transport	1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040	Climatic Factors, Air
008 Carbon reduction and climate resilient design 007 Flood risk, drainage and SUDS 010 Health and Wellbeing	2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	Water, Climatic Factors
006 Green belt 009 Natural Resources	3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	Soil, Material Assets, Biodiversity
001 Housing need, requirement and mix 002 Affordable housing 003 Specialist housing	4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	Material Assets, Population, Human Health
010 Health and Wellbeing	5. To reduce poverty, social exclusion, and health **inequalities**.	Population, Human Health, Material Assets
013 Livable city 014 Infrastructure	6. To provide accessible essential **services and facilities**.	Material Assets, Human Health
005 Green infrastructure and biodiversity	7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	Landscape, Biodiversity, Human Health,
012 Transport 009 Natural Resources	8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	Air, Climatic Factors
009 Natural resources	9. To achieve **water** quality targets and manage water resources.	Water, Biodiversity

005 Green Infrastructure and biodiversity	10. To conserve and enhance Oxford's **biodiversity**.	Flora, fauna, biodiversity
011 Urban design, placemaking, heritage and archaeology	11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	Cultural Heritage, Landscape
004 Employment and inclusive economy	12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	Population, Material Assets

2. Policy context (Sustainability Appraisal Task A1)

2.1 Oxford's Local Plan 2042 will be influenced by a range of policies, plans, programmes and sustainability objectives. The key policies, plans and programmes that affect the entire plan are discussed below. Additional policies/plans/programmes that affect individual topic areas such as air quality and deprivation are discussed in the 14 Background Papers which support the SA (Table 1.5).

2.1. National context

Levelling Up and Regeneration Act 2023

2.2 This Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes which are intended to boost development and speed up the planning process. Many of the changes provided for in the legislation are dependent on subsequent regulations before they would come into effect and detail as to how or when they will come into place specifically is limited. The various changes that the Act lays the groundwork for include:

- Greater digitisation of planning documents
- SA/SEA replaced by "environmental outcomes reports"
- Community Infrastructure Levy replaced by a new national infrastructure levy
- Development of a common framework of National Development Management Policies (including on a national model design code), and commensurate focusing of Local Plans on locally specific matters
- Repeal of the Duty to Cooperate
- Speeding up of the plan-making process

- Removal of the requirement for a rolling five-year supply of housing land where the Local Plan is up to date.

Environment Act 2021

2.3 This Act was signed into law in November 2021 and assigned government a range of new powers to set binding environmental targets for issues such as air quality, water, biodiversity, and waste reduction. From February 2024 (and April 2024 for small sites), it required the majority of new planning applications to deliver at least 10% biodiversity net gain, based on the DEFRA Biodiversity Metric. The Act also set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country, which would identify important areas for biodiversity as well as opportunity areas for its enhancement. Oxfordshire County Council is currently preparing the LNRS which will cover the county, including the city of Oxford.

Climate Change Act 2008

2.4 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels). Under the Act, the government is required to set interim reduction targets via carbon budgets, most recently the sixth carbon budget was agreed, whilst the seventh is expected to be set in 2025.

National Planning Policy Framework (NPPF) and associated guidance

2.5 The NPPF sets out the Government's planning policies for England and how these are to be applied and was most recently updated in December of 2024.The NPPF addresses various topics that Local Plans should cover, including planning for housing, employment and protection of the environment (dealing with matters such as climate change, flood risk, biodiversity, high quality design and the historic environment). The various topic-specific background papers that inform this SA provide detailed summaries on the relevant aspects of the NPPF for each topic.

2.6 The NPPF is supported by an online National Planning Practice Guide and the National Design Guide of October 2019 which provides additional guidance on various topics. Again, where relevant, the supporting background papers expand on the relevant detail contained in these resources for each topic.

The Localism Act 2011

2.7 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 five designated Neighbourhood Forums: Headington, Littlemore, Summertown/St. Margaret's, Wolvercote and Blackbird Leys. The Headington and Summertown/St. Margaret's Neighbourhood Plans were 'made' in July 2017 and April 2019 respectively, whilst the Wolvercote Neighbourhood plan was 'made' in June 2021.

2.2. Regional context

Oxford-Cambridge Growth Corridor and Oxford Growth Commission

2.8 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire's Strategic Economic Plan, 2023

2.9 The Strategic Economic Plan (SEP) updates and replaces Oxfordshire's previous economic strategies. Informed by a county-wide conversation, it provides a post-pandemic statement of economic priorities for Oxfordshire. It charts a positive economic future for the county, and sets out a strategy to 2033. The plan includes four key objectives which the SEP will seek to advance, working in concert with other strategic processes across and beyond Oxfordshire, these are to:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation.
- Widen access to current opportunities and equip people and places as jobs change over the next decade.
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050.
- Ensure that Oxfordshire's places are sustainable and inclusive, and that local communities flourish.

Oxfordshire Local Transport and Connectivity Plan (LTCP), 2022

2.10 The LTP, adopted in July 2022, is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents. The LTCP is supported by a number of strategies and plans which are relevant to Oxford—these are detailed further in the Transport Background Paper.

Central Oxfordshire Travel Plan, 2023

2.11 The Central Oxfordshire Travel Plan COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors. The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets.

2.12 For Oxford these include the expansion of the Zero Emission Zone; strategic traffic filters to reduce traffic levels in Oxford; a workplace parking levy; improving priority and safety of sustainable modes in the city and introduction of a Central Oxfordshire Movement and Place Framework (a joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration).

East-west Rail link

2.13 In December 2022, England's Economic Heartland published 'connectivity studies' for an East-West rail link from Oxford to Milton Keynes and Cambridge; rail links from Oxford to Northampton, Wellingborough and Peterborough; and other connectivity improvements.

2.14 At the time of writing (January 2025) a consultation on the proposed route and improvements was live. This consultation proposed improvements to Oxford Station and the rail network in order to facilitate the delivery of East West Rail from Cambridge to Oxford.

Oxfordshire Minerals and Waste Core Strategy 2017

2.15 Part 1 (the Core Strategy) was adopted in September 2017 and sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste in Oxfordshire over the period to 2031. A Part 2 that would address site allocations was originally intended to follow, however, a decision was subsequently taken to pursue a new Oxfordshire Minerals and

Waste Local Plan (covering the period to 2042) which is expected to come forward in due course and will replace the current Part 1 (and Part 2 which was not pursued).

2.3. Local context

Oxford City Council Our Strategy 2024—28

2.16 The Council's ambition is for Oxford to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. We will nurture strong, inclusive communities and be a welcoming and supportive place for people from all backgrounds to work, live and visit. As part of the strategy, the Council has identified five priorities:

- Good, affordable homes
- Strong, fair economy
- Thriving communities
- Zero carbon Oxford
- A well-run council

Oxford's Economic Strategy (2022-2032)

2.17 This local strategy seeks to establish a new standard for economic inclusion in the city, underpinned by an impactful and purposeful contribution to the UK and global economy. It also seeks to rapidly address the environmental impacts of economic activity and harness the opportunities of a new net zero carbon economy.

Oxford Climate Emergency declaration and Zero Carbon Action Plan

2.18 In January 2019, Oxford City Council declared a climate emergency. Subsequently a number of organisations across the city came together to agree a net zero carbon target of 2040, ten years in advance of the national net zero target date. This ambitious target will require radical to secure emissions reductions action across all sectors including buildings, transport and waste.

2.19 In March 2021, the various stakeholders in the city who comprise the Zero Carbon Oxford Partnership (ZCOP), and including the Council, published an Action Plan and Roadmap for bringing about a net zero carbon city by 2040, or earlier. The document presents a decarbonisation pathway for the city, aligning with the 2040 goal, and outlines key milestones and actions which need to be taken in different sectors from 2020 to 2050. This includes actions that relate to planning and design of the built environment.

2.20 The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

2.4. Other Key Plans, Programmes and Environmental Objectives

2.21 Originally originating from European Union, there are several pieces of environmental legislation influencing planning policy in the UK that have subsequently been transposed into UK law. These include:

- the Habitats Directive (92/43/EEC) which were transposed into the Conservation of Species and Habitats Regulations 2017 (amended in 2019),
- Air Quality Directive (2008/50/EC) which is transposed into the Air Quality Standards Regulations 2010
- Water Framework Directive (2000/60/EC) which is transposed into the Water Environment Regulations (Water Framework Directive) 2017.

3. Sustainability context (Sustainability Appraisal Task A2)

3.1 In the absence of a new Local Plan 2042, the Local Plan 2036 would continue. It is important to understand the current sustainability context for the city and how this could change in future under this scenario, before we can consider the impacts of taking forward any new Local Plan.

3.1. Current situation and likely future without a new Local Plan

3.2 Table 3.1 therefore presents an analysis, supported by the assessments presented within the supporting Background Papers, which summarises the current situation and the likely situation if the current Local Plan 2036 continued but no new Local Plan 2042 was prepared. It helps to inform the baseline from which to assess the impacts of the new Local Plan 2042 as it is prepared.

Table 3.1: Current situation and likely future without the plan

SA topic	Current situation	Likely future without plan	Summary findings
1. Carbon emissions	-	-	Per capita carbon emissions in Oxford show a steady decline (more than 40% since 2005), principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. National building standards for new development are

			improving but not to net zero standards and ignore other elements like embodied carbon/energy. Whilst the Local Plan can set standards for carbon reduction in new buildings (and the existing Plan does this), it has limited powers in other respects, for instance, driving the retro-fit of existing homes (e.g. via energy efficiency measures). Greater energy efficiency and renewable energy requirements can also conflict with other priorities, such as providing affordable homes owing to viability issues. Regardless of new development, there will be an ongoing need for significant retro-fitting of existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales. The city's Net Zero Carbon Action Plan identifies the key steps/milestones that need to be met to secure net zero by 2040 and the Zero Carbon Oxford Partnership aims to drive this through various initiatives (Local Plan is only one part of the response).
2. Resilience to climate change	**--**	**-**	A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. This risk is likely to increase with climate change. A flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Given constraints on development in Oxford, there could be increased pressure to locate development in areas of higher flood risk or upon areas of existing flood storage. Local Plan 2036 has strong policies on flood risk, as does NPPF, but residual risk can remain an issue for new development in at risk areas. Oxfordshire County Council has undertaken a Climate Risk assessment for Oxfordshire: alongside flooding it identifies overheating as an increasing risk, particularly if future global climate change targets are missed. Updated national building standards have incorporated limited requirements to consider overheating in new buildings but resilience building to this risk, as well as flooding from various sources, will need to be achieved through a variety of responses: Local Plan policies are one tool in the longer term, but other actions will also be needed.

3. Efficient use of land	**0**	**0**	Increased housing pressure means that there will be even more pressure on undeveloped land including green spaces which are important for sustainable communities and biodiversity. Without a new plan, housing may be developed in less sustainable locations. Without policies to prioritise delivery of new homes, many sites are far more likely to come forward for commercial uses (in less suitable locations). Development density and protection of undeveloped land have been good to date. Protection of undeveloped land should have supported the protection of soil in parts of the city, although it is likely that soil quality in other areas could be impacted by urbanisation. The higher costs associated with dealing with any remaining contaminated sites could affect viability and increase pressure to develop greenfield sites. Oxford has a number of locations with peat-rich soil deposits which are particularly valuable as important storage for carbon (carbon sinks), managing/storing water, and also for retaining archaeological deposits. Historic development has likely removed some wider deposits, and there are also potentially unmapped/unknown deposits still present in areas. Current Plan protects some of the key areas of known deposits (as protected open space), but there is potential for additional losses of unrecorded deposits to development in future without additional mitigation.
4. Local housing needs Need and supply	**--**	**--**	Previous housing need assessments have identified that there is not enough capacity within Oxford to meet all of the housing need. Using the government's proposed standard method (published December 2024) annual housing need is set at 1,087 per annum (21,740 for the 20 year plan period). This is more than the identified capacity in the city, which is likely to remain the case to 2042. Some of Oxford's housing needs may therefore need to be met outside the city. Without additional large-scale development sites, the proportion of homes delivered through small infill sites is likely to increase, and could increase pressure on the existing infrastructure owing to the incremental nature of these proposals, without them delivering new on-site infrastructure. There is also

			limited opportunity to deliver affordable housing from these smaller developments.
	Affordable housing	--	--	House prices in Oxford are already very high, and future prices are likely to continue to rise more quickly than average salaries. Housing to rent on the open market is also unaffordable to a significant proportion of people. So delivering affordable housing is also a priority for the Plan, particularly for those in greatest levels of need (social rent homes). The annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme. However, national policy provides challenges, for example reducing the number of sites from which contributions can be sought towards affordable housing to those of 10 or more units, and allowing affordable housing models which are still not affordable in the Oxford context.
	Students and student accommodation	0	0	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5.	**Inequalities and health** Inequality	-	--	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health. These are being exacerbated by the cost of living crisis. Continued action needs to be taken to address these inequalities to enable all parts of Oxford's communities to experience a good quality of life. For example, 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 13 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Inequalities are likely to exacerbate the future risks to health and wellbeing caused by climate change, particularly overheating and flooding. Oxford is already at higher risk to overheating because of the level of urbanisation compared with other parts of the county and this will continue in future according to 2050 projections without appropriate resilience measures.

	General health	+	+	Despite more localised inequalities, Oxford residents' general health is good and the 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. There is some national research that indicates national picture of population health is deteriorating, although consequences for Oxford's population specifically are unclear. See also analysis against 'inequality' above.
	Health and housing	-	--	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits are delivered. See also analysis against 'inequality' above.
6.	**Services, facilities and infrastructure** Community facilities	**0**	**-**	Availability of services and facilities plays a key role in quality of life and Oxford's compact nature means there are many areas which benefit from good access to daily needs, however this is not universal across city. The pandemic highlighted the value people put on facilities in their local areas. 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. Economic shocks like the pandemic and other factors including rising costs of energy and living in general continue to put pressure on services, community and cultural facilities however. Changes to use class order such as the introduction of use class E make it harder to protect particular services/facilities through local planning policy.
	'Grey' infrastructure	-	-	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon. Transport is covered under 8. (Traffic and air pollution). Water is covered further under 9. (Water). The improvements needed to address many of the grey infrastructure issues are somewhat outside of the Local Plan's control. They rely upon investment and infrastructure upgrades by others with primary

				responsibility for the infrastructure, such as the utilities providers, with the Council acting in a enabling/supporting role helping to ensure plans are appropriate for scales of growth expected.
	Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7.	**Green infrastructure and leisure**	++	+	Oxford has a wide range of green spaces which are generally of good quality although unevenly distributed. However, as Oxford's population increases, there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. Limited development opportunities are likely to maintain an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features. It is unlikely that new large public open spaces will be created with or without a Plan, although smaller spaces could be, and existing open spaces can be enhanced. In addition, any green space (unless it can be show to be surplus) lost to development has to be replaced elsewhere in the city. Green spaces will need to respond to climate change, providing long term flood protection and adaptable habitats, as well as other to impacts from surrounding urbanisation like pollution (e.g. water, air).
8.	**Traffic and air pollution** Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at many major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. The Oxfordshire authorities are focusing on active travel, improving walking and cycling infrastructure and public transport, and restricting cars e.g. through low traffic neighbourhoods, traffic filters, work place parking levy, extending the area of the zero emission zones and supporting the introduction of non ICE bus fleets. These actions should potentially benefit air quality as well as congestion.

			The national phasing out of petrol/diesel cars and shift to electric vehicles will help to improve air quality.
	Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. 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. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9.	**Water** Water resources	-	--	Oxford is in an area of serious water stress and the current Local Plan sets water use limits on new development in line with Building regs for this reason. Water resources are currently adequate but may not be by 2042 due to challenges like climate change and increased demand for water from a growing population. Beyond any Local Plan, Thames Water have various interventions planned as part of a strategy covering the next 50 years to address water supply deficits through their Water Resources Management Plan (2024), including proposing a large new reservoir at Abingdon. There are various ecological sites in the city which are sensitive to changes in hydrology (water flows and water quality). The Local Plan 2036 sets policies which ensure development considers and addresses potential impacts and these would remain relevant in the absence of a new Plan.
	Water quality	-	?	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence (e.g. agricultural practices and invasive species). Other causes have a more direct relationship to development, for instance, run-off from increased development could worsen this. The extant Local Plan cover city to 2036 and includes policies that help address water quality such as SuDS to address run off. Addressing existing capacity problems at the wastewater treatment plant which serves housing in the city is considered to be the key intervention needed to support improvements in water quality. Recently, the Council, EA and Thames Water have

			come to agreement on an upgrade scheme that should address capacity concerns for the Sewage Treatment Works, and as this come online in future, the situation is likely to improve for water quality in the city.
10. Biodiversity	**-**	**0**	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally (irrespective of the Local Plan) and superseding existing biodiversity net gain policy in Local Plan 2036. The County are preparing a Local Nature Recovery Strategy which identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue to put pressure on biodiversity more broadly.
Nature conservation areas	**+**	**0**	Nature conservation areas such as Oxford Meadows SAC are currently relatively well protected, and policies in the extant Plan protect all green spaces identified as being of high biodiversity value at a local, regional or national level. This would remain the case to 2036, after which national policy would apply. Designated sites like the SAC and SSSIs benefit from national protection, however the absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).
11. Urban design and historic environment	**++**	**+**	Oxford has a high-quality landscape and historic environment. Various national protections for designated historic assets (e.g. listed buildings) and non-designated local assets will continue under current Local Plan. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape and townscape.
12. Employment and economy Employment	**++**	**++**	Oxford has a very strong economy, with high employment, low unemployment and high Gross Value Added. Oxford is a 'fast growing', 'innovative' city that delivers significant economic growth. There is strong demand for research and development uses, which needs to be supported as a key sector of Oxford's economy and a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.

Unemployment	++	++	Future 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. Also, see analysis against 'employment' above.
Education, skills and employability/ training	+	?	Oxford Economic Strategy includes a vision to deliver a more 'inclusive economy.' The city includes 9 areas amongst the most deprived in UK. Oxford's population overall is highly skilled, but there are parts of the city (8 areas) where the local population is classified within the 10% most deprived for educational skills and training in the country. 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. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	0	0	It is unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

3.3 Even without the Local Plan 2042, the analysis in Table 3.1 indicates that there will be some improvements in performance against certain sustainability indicators for the city in future due to factors outside of the Local Plan's direct influence such as national legislation and shifting technologies on the market. For example, the Biodiversity Net Gain requirements of the Environment Act, alongside the opportunities identification of the Local Nature Recovery Strategy may help to support new spaces for flora and fauna. Tightened building regulations bringing about improvements in energy efficiency and the ongoing decarbonisation of grid energy will go some way to reducing carbon emissions. Meanwhile, the policies of the Local Plan 2036 will remain in effect, securing various sustainability benefits from new development coming forward in the intervening period.

3.4 There will likely also be reductions in the performance of the city against some sustainability indicators without a new Local Plan, such as increasing pressures on land including green spaces or areas of flood storage, as well as pressure from new development on the setting of existing assets like historic buildings which contribute to the character of the city. The impacts of climate change are a factor which will have various effects such as increased stress on water resources, and increasing health risks from hotter summers. Whilst the city's economy is buoyant and expected to continue to generate employment opportunities, there is a risk that those with less skills or experience could be left behind where these opportunities are skewed towards higher skilled sectors; meanwhile, uncertainty and cost of living challenges could impact upon provision of services and other facilities for local residents.

3.5 The Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development which now allow, for instance, offices to be turned into housing. It also preceded the creation of the new Oxford Growth Commission as part of the government's new plans for the Oxford-Cambridge Growth Corridor; the city's declaration of a climate emergency and subsequent signing of a net zero carbon target of 2040. Meanwhile, there are ongoing challenges such as the continued housing crisis, the changing picture of retail, and impacts of pollution on the environment from various activities which have not been resolved. A new Local Plan offers the opportunity to respond to these changes and ongoing challenges.

3.2. Existing problems at areas of particular environmental importance

3.6 Also of relevance to the current sustainability context of the city, the SEA process 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. This section also discusses the city's Sites of Special Scientific Importance which are nationally designated areas of importance in the city.

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

> **Oxford Meadows SAC -** is a 267ha site, part of 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 of Oxford Meadows, 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. Previous HRA work and discussions with Natural England have also flagged concerns about air quality impacts arising from traffic emissions and recreational disturbance.

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 December 2015, the last year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('global') value. The SAC 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 December 2015, the last year of analysis of Little Wittenham, the great crested newt population was assessed as being of good overall ('global') value, but it is highly threatened by non-native invasive species.

3.8 Additionally, Oxford also has a number of Sites of Special Scientific Importance (SSSIs) as is shown at Table 3.2 and Figure 3.1. Of those SSSIs within, or partially within the city, they are of varying condition, with the majority being in favourable condition, but two in unfavourable condition and three in partial unfavourable condition. The information on SSSI condition is normally 5-10 years old, so their condition may have changed since it was assessed. The table includes links to the summary information for each site on Natural England's Designated Sites viewer website.

Figure 3.1: Locations of Special Scientific Interest (SSSIs) within and around Oxford and their condition, (source: DEFRA MAGIC website accessed 13.01.25)

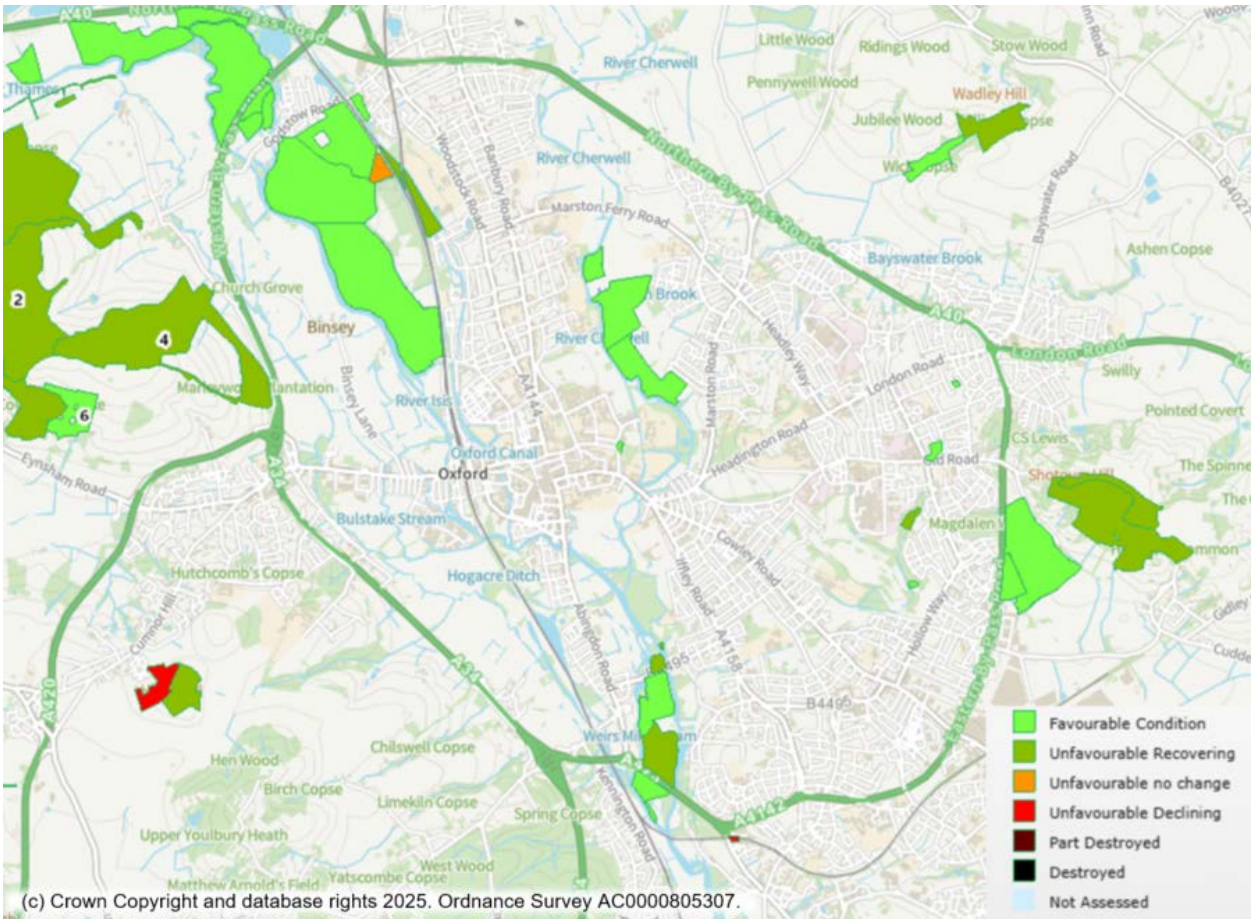


Table 3.2: Additional details relating to Sites of Special Scientific Interest (SSSIs) within Oxford or nearby

Site of Special Scientific Interest (SSSI)	**Size in hectares**	**Within city?**	**Unit(s) condition**
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting	0.50ha	Yes	100.00% Unfavourable declining
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove	0.43ha	Yes	100.00% Favourable

Magdalen Quarry	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable
Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

3.9 As can be seen above, the areas of particular environmental importance in and around the city are in varying condition and subject to various ongoing threats. Some of these threats can be more directly influenced by the Local Plan and the planning system than others.

4. Identify key sustainability issues and problems (Sustainability Appraisal Task A3)

4.1 The policy context of Task A1 and sustainability context of Task A2, as was presented in the previous sections and accompanying Background Papers, identified a range of issues and problems of relevance to the development of the Oxford Local Plan 2042. This section now takes forward and identifies the key sustainability issues and problems that the Council will need to be aware of and respond to where possible in line with Task A3 of the SA process. It is an important step in helping to narrow down the focus of the Local Plan 2042 as well as the accompanying SA/SEA process informing the Plan's development.

4.2 Table 4.1 draws together the key issues and problems which were highlighted in the previous sections and the 14 background papers that support the SA.

Table 4.1: Key sustainability issues and problems for the Oxford Local Plan 2042

SA objective	Sustainability issues and problems
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Oxford is still very far away from achieving its 2040 target of net zero emissions and Local Plan cannot deliver it alone. • Retrofitting existing developments will be a significant challenge but critical to helping meet local and national net zero targets. • New development must not further contribute to climate change or the existing retro-fit burden in the city. • Policy needs to target energy efficiency and embed the energy hierarchy into the design of new buildings (fabric first, reducing energy use, mitigating remaining emissions). • Embodied carbon is an ongoing challenge to be addressed as part of the construction process although it is a complex and multi-faceted issue. • There is potential for supporting more renewable energy generation across city through greater uptake of micro-renewables in new development and on existing rooftops, although capacity elsewhere (e.g. for larger installations) is uncertain due to the many constraints on land.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. The Oxford Flood Alleviation Scheme is expected to reduce flood risk for a number of existing properties and infrastructure. • There will be residual risks of flooding after applying the sequential approach to locating development and incorporating defence measures. • Overheating is a prominent and increasing risk in the city, particularly more urban areas. Overheating risk is exacerbated in areas with reduced green infrastructure as well as higher levels of deprivation or poor quality buildings. • The Local Plan 2042 will need to take long term flood risk and overheating into account, including the impacts of climate change and how this could change the pattern and severity of these risks in the city. • New development should not exacerbate flood risk or overheating, such as through excessive use of hard

	surfaces increasing surface run off into sewers, or exacerbating the urban heat island effect. • There are links between flooding/overheating and human health (physical and mental), particularly in areas of the city that are most deprived or highly urbanised/lacking in green infrastructure.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• The plan must aim to use suitable brownfield sites and other underutilised land as a preferred option for development. • An increase in minimum housing density should be considered where a sufficient level of infrastructure is present. • Prioritising brownfield land for development may reduce opportunities to repurpose the sites for public amenity or as green infrastructure with a focus on ecological/biodiversity functions. • The cost of developing contaminated sites is likely to be higher than developing elsewhere. In turn, these higher costs increase pressure to develop greenfield sites. • Soils are at risk from pollution arising from new development as well as degradation from development/construction processes, this includes limited carbon-rich peat reserves that have already been degraded by historic development in the city. • The City Council should only release land from the Green Belt or alter the boundary where exceptional circumstances are fully evidenced and justified. • The plan should consider a more comprehensive approach to Oxford's Green Belt and whether any part of it is now designated as 'grey belt' as defined in the updated NPPF (December 2024).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing costs in Oxford are very high, land available for housing is very limited, and affordable housing has historically been difficult to provide. • Oxford has limited capacity to deliver new homes within its boundary and has been unable to meet housing need in full without support from neighbouring authorities. • A continued reliance on smaller sites is likely to increase pressure on existing infrastructure. • The type of affordable housing delivered in Oxford is likely to be impacted upon by changes made through national policy, i.e., requirements for First Homes. • The Plan should assess and respond to the need for student housing: The links between provision of student housing and other types of housing should be considered when developing policies.

	• The potential implications of student housing in different locations, for students, neighbourhoods and in terms of delivering sufficient housing of the right type should be considered.
5. To reduce poverty, social exclusion, and health **inequalities**.	• Oxford has high levels of health inequalities across the city. • Covid and the ongoing cost of living crisis have exacerbated inequalities and harmed health for many. • Oxford's higher-than-average levels of activity and lower-than-average levels of obesity need to be maintained and improved. • The Local Plan can help to improve mental health and wellbeing through, for instance, improving quality of housing, improving access to open spaces, and focusing on building communities, particularly learning from the coronavirus pandemic. • Climate resilience measures will be essential for reducing impacts on health and wellbeing as the city moves towards a net zero future, particularly for the most vulnerable communities.
6. To provide accessible essential **services and facilities**.	• Economic shocks impacting cost of living and generating higher energy prices is likely putting strain on community and cultural facilities. Protection of facilities may become more difficult, given changes to government policy on permitted development. • With high pressure for housing, it will be important to make a case for the importance of the facilities that support this housing. The plan will need to meet the infrastructure needs of additional development in the city over the Local Plan period. • New infrastructure must address the climate emergency (low carbon, climate resilient). Natural solutions will be important in ensuring the resilience of infrastructure. • Infrastructure needs to help people to live healthy, active lives (e.g. walking/cycling, GP surgeries). • The city generally and its infrastructure should be adaptable to future changes in technology. • The retail and service sector plays a crucial role in Oxford's economy, providing job and leisure opportunities to local people. The city must offer a diverse range of retail uses and services, ideally in accessible locations.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• Unequal access to, and distribution of, green infrastructure across the city exacerbate wider health inequalities. There are priority areas which would benefit particularly from increased greening.

	• Infill development within the city, particularly on garden land, can reduce green infrastructure coverage which would otherwise provide natural benefits like water storage and habitat for wildlife. • Increased recreational pressure arising from population growth and visitors to the city puts pressure on open spaces including playing pitches which are important for health and wellbeing of residents, particularly those without gardens. • Climate change and impacts from development such as on water quality (e.g. run-off from roads etc.) puts pressure on existing green infrastructure and biodiversity. • Very limited opportunities to create large areas of new public open space.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Although Oxford is known for its high levels of walking, cycling and public transport use, Oxford's roads are still congested, with high levels of commuting by car. • All of Oxford is an Air Quality Management Area because of NOx, which mostly comes from vehicles. Tackling emissions from domestic and nondomestic sources is likely to improve air quality. • Past transport policy has focused on carrots: improving facilities for walking, cycling and public transport. However current policy is also to discourage car use, for instance through restricted parking, zero emission zones, and reallocation of some road space to sustainable forms of transport. • Restrictions in car use in the city must be supported via a strong and affordable public transport infrastructure network. • Improvements in electric transport provision and the restriction of cars in the city centre will help to achieve a zero carbon Oxford. The uptake of low/zero emission vehicles should be encouraged, in particular buses and taxis which will continue to need to access the city centre. • Improvements to cycling and walking infrastructure must be inclusive and the benefits shared by all of Oxford's residents. • Improved public transport connections between the city and surrounding areas will improve the integration of settlements throughout Oxfordshire
9. To achieve **water** quality targets and manage water resources.	• Oxford is already in an area of serious water stress. Climate change, particularly incidences of hotter, drier summers may exacerbate water supply issues and create increased water shortages.

	• Increased demand for water is likely to put more pressure on water resources. Additional water efficiency measures will need to be investigated through the plan-making process. • There are known water quality issues in local watercourses arising from a variety of sources. Nutrients from wastewater could further impact these local water bodies. Pollutants can also arise from other sources, like road runoff. This may have knock on implications in terms of the Water Environment Regulations, and the city's ambitions for bathing water status for parts of the River Thames. • Capacity upgrades are needed for the wastewater treatment works that services the city, Thames Water are working on plans to undertake these works but these plans are still emerging and will take time to complete. • There are various ecological sites in the city which are sensitive to changes in underlying hydrology that supports these areas (both changes in water flows and water quality), which new development may need to consider depending on location.
10. To conserve and enhance Oxford's **biodiversity**.	• The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure, changes to the hydrological regime as well as invasive species. • Two SSSIs out of the twelve in the city are in unfavourable condition and three are partly in unfavourable condition. • Development pressure on, or near to protected sites could result in direct loss of habitat or species, fragmentation of ecological networks, as well as indirect impacts e.g. from noise, light, air pollution. • Climate change is likely to impact habitats and species distribution. • Off-site areas for biodiversity net gain stemming from development will probably be needed in response to the Environment Act. • The County are preparing a Local Nature Recovery Strategy, a key requirement arising from the Environment Act. This document should identify opportunity areas for biodiversity enhancement in the city and wider county (including offsite BNG), although there may be other opportunity areas. The LNRS does not assign additional protection nor mandate enhancements itself.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets	• Oxford is a historic city, characterised by an abundance of designated and non-designated heritage assets which form an important part of the city's character.

while respecting local character and context and promoting innovation.	• Potential heritage impacts of new development proposed in the plan should be considered and assessed where necessary, both in terms of any direct physical impacts and impacts on setting. • Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character. • Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city. • Green spaces and features should be woven into the urban fabric. • Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets, which will require a Whole Building Approach to any retro-fit measures. • Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Employment in the city remains high and likely to continue growing; • The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing. Some employers have reported difficulties attracting and retaining staff because of these issues; • It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs; • The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites; • A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner; • Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D;

	• Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people; • State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages; • Some changes were accelerated by the pandemic. For instance, due to the increase in on-line retail, the make-up of the city and district centres are seeing a shift in their make-up. Once dominated by retail, other uses, such as employment and educational uses are bringing footfall and vitality and these important centres. Examples of non-retail opportunities that are emerging in city centres include co-working spaces, R&D and more; • Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city; • Small scale brownfield development across the city is more likely to put pressure on existing school places and will not in itself provide new school sites.

4.3 Table 4.1 has brought together the key issues and problems identified across the SA scoping work and the accompanying Background Papers. It highlights a range of challenges facing the city in relation to different aspects of sustainability which the new Local Plan will need to try to respond to. The analysis not only helps to frame the vision and objectives for the new Local Plan but also helps in informing the assessment framework that should be utilised to appraise the emerging policy framework and its impacts on the city and wider environment.

5. Develop the SA framework (Sustainability Appraisal Task A4)

5.1 An SA/SEA Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. The analysis undertaken in the previous sections of this report, and fulfilling tasks A1 to A3 of the SA process stage A, helps to formulate the specific SA/SEA Framework that should be used for the Local Plan 2042, ensuring that it is tailored to the local context of Oxford. The development of the Framework is discussed in this section.

5.2 Development of the Local Plan 2042 will involve two types of decisions:

- on the plan objectives, alternatives and policies (general directions for the plan); and
- on sites (specific locations for development).

5.3 Assessing the impacts of the plan objectives, alternatives and policies involves a more general analysis against an overall framework of SA objectives. Assessing the impacts of sites involves analysing the site's location and future ability to support sustainable development. As such, two different appraisal frameworks have been used, which are discussed in turn in the following sub-sections.

5.1. The SA framework for plan objectives, alternatives and policies

5.4 The SA Framework of Table 5.1 consists of SA objectives and issues and is what will be used to assess the impacts of the plan objectives, alternatives and policies. The SA objectives provide a method by which to test whether the Local Plan will yield the best possible outcomes in terms of sustainability—its environmental, social and economic effects. The SA objectives therefore cover a full cross-section of sustainability issues. The objectives and the issues covered have been informed by the analysis undertaken in the previous tasks (particularly the key issues/problems identified under Task A3/Section 4).

Table 5.1: SA/SEA framework for plan objectives, alternatives and policies

SA Objective	Issues covered	SEA Themes
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Building standards and energy efficiency • Renewable energy generation • Active travel and public transport • Waste reduction • Sustainable construction practices including addressing embodied carbon	Climatic Factors, Air
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• Flooding • Resilient and adaptable building design and layout • Overheating	Water, Climatic Factors
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• Building densities and layout • Greenfield versus Brownfield land • Green belt and grey belt? • General biodiversity and designated sites • Soils including peat reserves. • Land contamination	Soil, Material Assets, Biodiversity

4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing numbers • Housing size/mix • Affordable housing • Specialist accommodation (e.g. care homes, gypsies/travelers) • Student accommodation	Material Assets, Population, Human Health
5. To reduce poverty, social exclusion, and health **inequalities**.	• Regeneration • Geographical spread of new development • Accessibility for areas of deprivation • Availability of services/infrastructure in areas of deprivation • Improving health and wellbeing and reducing health inequalities	Population, Human Health, Material Assets
6. To provide accessible essential **services and facilities**.	• Daily needs met within a short walk/cycle ride • Thriving city/local centres • Retail/shops provision • Community facilities, health care/GP, schools • Facilities for children/young people inc. play areas • 'Grey' infrastructure e.g. wastewater treatment, transport, energy.	Material Assets, Human Health
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• A network of green and blue infrastructure • Leisure facilities • Playing fields and public open space • Distribution/location as well as quantity of typologies of green infrastructure (inc the above)	Landscape, Biodiversity, Human Health,
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Promoting active travel – walking/cycling etc. • Reducing reliance on the private car • Public transport incl. Train station and branch line • Commuting and housing/jobs balance • Parking • Electric vehicle charging points, zero emission zones • Addressing poor air quality and links to transport	Air, Climatic Factors
9. To achieve **water** quality targets and manage water resources.	• Water use and water resources • Improving water quality and avoiding further deterioration • SUDS, buffers on streams etc.	Water, Biodiversity
10. To conserve and enhance Oxford's **biodiversity**.	• Habitat Regulations Assessment inc. Air quality and recreational disturbance • SAC, SSSIs, local nature designations • Biodiversity more generally (e.g. wildlife friendly measures and habitat features)	Flora, fauna, biodiversity

	• Biodiversity Net Gain (BNG)	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Designated assets incl. Listed Buildings, scheduled monuments, Registered Parks & Gardens and Conservation areas • Non-designated assets, particularly those of local importance • Archaeology • Setting/curtilage • High quality urban design • View cones • High buildings	Cultural Heritage, Landscape
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Jobs incl. Knowledge-based jobs • Visitor economy • Locations for start-up ventures • Jobs for local unskilled/underskilled residents, apprenticeships • Keeping high streets alive amist changing shopping habits, changes to permitted development etc. • Cultural provision and tourism	Population, Material Assets

5.5 The SEA process requires the Environmental Report to include information on the likely significant effects on a specified list of environmental factors. Table 5.2 shows how the SA Objectives relate to these factors.

Table 5.2: Links between SEA Directive issues and SA objectives

SEA Directive issue	**SA objectives**
Biodiversity	3, 7, 9, 10
Population	4, 5, 12
Human health	4, 5, 6, 7
Flora	10
Fauna	10
Soil	3,
Water	2, 9
Air	1, 8
Climatic factors	1, 2, 8,
Material assets	3, 4, 5, 6, 12
Cultural heritage (including architectural and archaeological heritage)	11
Landscape	7, 11

5.2. The SA framework for sites

5.6 More site-specific appraisal criteria will be used to assess the impact of proposed development sites. Many of these relate to the location of the site, which is a key determinant of its sustainability: how easily would users of the site be able to access a range of facilities (more sustainable), and how close is the site to sensitive environmental areas (less sustainable)?

5.7 The same colour/symbol coding will be used as for policy appraisal (see Table 1.4), however there may be instances where an additional colour/code will be used to score a particular criterion where the ultimate score will depend upon implementation of the particular design of a proposed scheme. The site-specific criteria is listed below under each SA objective.

- **SA objective 1.** To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

  See SA Objective 8 for decision-making criteria.

- **SA objective 2**. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

  Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Table 5.3: Sites sustainability appraisal scoring criteria for SA objective 2

Category	Flood zones
--	Site is partially or wholly in Flood Zone 3b
-	Site is partially or wholly in Flood Zone 3a or Zone 2
0	Site is in Flood Zone 1
Category	**Flooding of land surrounding site for access/ egress**
--	There is no safe access/egress to/from the site
-	Access/egress from the site is over moderate to low hazard land
0	There is safe access/egress from the site – area surrounding site is FZ1

- **SA objective 3.** To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

  Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Table 5.4: Sites sustainability appraisal scoring criteria for SA objective 3

Category	Previously developed land
--	Site is protected open space

-	Site is unprotected open space
0	Site is previously developed land (with buildings in use on site)
+	Site is previously developed land (with vacant buildings on site)
++	Site is previously developed land (cleared)
Category	**Green Belt**
--	Site is on Green Belt land
0	Site is not on Green Belt land

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

  Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Table 5.5: Sites sustainability appraisal scoring criteria for SA objective 4

Category	Housing provision
-	Site would decrease the amount of net new housing
0	Site would provide no net new housing
+	Site would provide up to 10 new homes
++	Site would provide more than 10 new homes
I	Depends on implementation
Category	**Affordable Housing provision**
-	Site is allocated for housing but would provide no affordable housing
0	Site is allocated for use other than housing or is not allocated
+	Site provides up to 50% affordable housing
++	Site provides 50% or more than 50% affordable housing
I	Depends on implementation

- **SA objective 5.** To reduce poverty, social exclusion, and health **inequalities**.

  Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Table 5.6: Sites sustainability appraisal scoring criteria for SA objective 5

Category	Regeneration Areas
0	Site is not in or adjacent to a regeneration area
+	Site is adjacent to a regeneration area
++	Site is in a regeneration area

- **SA objective 6.** To provide accessible essential **services and facilities**.

  Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8.*

Table 5.7: Sites sustainability appraisal scoring criteria for SA objective 6

Category	Community facilities
-	Allocation leads to a decrease in community facilities
0	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation
+	Community facilities provided on site
++	Allocation leads to a significant increase in community facilities
I	Depends on implementation

- **SA objective 7.** To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

  Decision-making criteria: Will it increase the provision of public open space?

Table 5.8: Sites sustainability appraisal scoring criteria for SA objective 7

Category	Public open space
-	Allocation leads to a decrease in public open space
0	Site not allocated OR amount of public open space remains the same due to the allocation
+	Site allocated for housing – 10% public open space provided on site
++	Allocation leads to an increase in public open space greater than 10% of the total site area

- **SA objective 8.** To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

  Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Table 5.9: Sites sustainability appraisal scoring criteria for SA objective 8

Category	Sustainable transport links (bus stop)
-	> 400m from a bus stop
+	< 400m from a bus stop
Category	**Sustainable transport links (rail station)**
-	> 1600m from train station

0	1200-1600m from train station
+	800-1200m from train station
++	< 800m from train station
Category	**Primary Schools**
-	>800m from the nearest primary school with spaces
+	<800m from the nearest primary school with spaces
Category	**Secondary Schools**
-	>800m from the nearest secondary school with spaces
+	<800m from the nearest secondary school with spaces
Category	**GP Surgeries**
-	>800m from the nearest GP Surgery
+	<800m from the nearest GP Surgery
Category	**Post office**
-	>800m from the nearest post office
+	<800m from the nearest post office
Category	**Air Quality**
--	Site is within or adjacent to a local air quality monitoring hotspot
-	Site is within an Air Quality Management Area (AQMA)
0	Site is not within an AQMA

- **SA objective 9.** To achieve **water** quality targets and manage water resources.

  Decision-making criteria: Does the site contain, or is it near, a water body?

Table 5.10: Sites sustainability appraisal scoring criteria for SA objective 9

Category	Water
--	Site contains a water body (e.g. lake, pond, stream)
-	Site is within 30m of a water body
0	Site is not within 30m of a water body

- **SA objective 10**. To conserve and enhance Oxford's **biodiversity**.

  Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Table 5.11: Sites sustainability appraisal scoring criteria for SA objective 10

Category	Ecology and Biodiversity
--	Contains an internationally or nationally protected site: Oxford Meadows SAC or SSSI
-	Contains or is adjacent to a locally protected site. Within 100m of a nationally/ internationally designated site. Potential for legally protected species to be present

0	Within 100m of a locally protected site or 200m of an internationally/nationally protected site
+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity
++	Contains no nature conservation designations but has potential for significant nature conservation enhancement

- **SA objective 11.** To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

  Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Table 5.12: Sites sustainability appraisal scoring criteria for SA objective 11

Category	**Archaeology**
--	Site contains a nationally important archaeological site (such as a Scheduled Ancient Monument)
-	Site provides the setting to a nationally important archaeological site OR site has known archaeological sites or potential (e.g. close to 'Sites and Monument' symbol or in local area of archaeological importance)
0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Category	**Conservation Areas & Register of Parks and Gardens (RPG)**
--	Site lies in a conservation area or the site is on the RPG register
-	Site lies on the edge of a conservation area or of a site on the RPG register
0	Site is not in or on the edge of a conservation area or site on the RPG register
Category	**Listed Buildings**
--	Site contains a listed building
-	Site forms the setting of a listed building or contains a locally listed building
0	Site contains no identified historic building constraint
Category	**View Cones**
-	Site lies within a view cone
0	Site lies outside of a view cone
Category	**Historic Core Area**
-	Site lies within the City Council's locally designated Historic Core Area.
0	Site lies outside the City Council's locally designated Historic Core Area.

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

Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Table 5.13: Sites sustainability appraisal scoring criteria for SA objective 12

Category	Employment Opportunities in the knowledge-based economy
-	Site would mean loss of jobs or economic floorspace in knowledge-based economy
0	No change in number of jobs/economic floorspace in knowledge-based economy
+	Site would increase number of jobs or economic floorspace in knowledge-based economy
I	Depends on implementation
Category	**Diversifying the economy end employment opportunities**
-	Site would not support diversification of the employment base or provision of affordable workspace
0	No change in employment base or access to affordable workspaces
+	Site would support diversification of the employment base or provide affordable workspace
I	Depends on implementation

5.8 Figure 5.1 summarises the site-specific criteria and shows how these link with the SA objectives of Table 5.1.

Figure 5.1: Site assessment appraisal criteria versus SA objectives

Site assessment criteria	SA objectives											
	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
Flood zone		■										
Flood risk on land surrounding site		■										
Type of land (e.g. PDL, Green Belt)			■									
Housing provision inc. affordable housing				■								
Regeneration area					■							
Provision of community facilities						■						
Provision of public open space							■					
Sustainable transport links: bus stop	■							■				
Sustainable transport links: train station	■							■				
Distance to primary school	■							■				
Distance to secondary school	■							■				
Distance to GP surgery	■							■				
Distance to post office	■							■				
Air quality								■				
Water									■			
Ecology and Biodiversity										■		
Archaeology											■	
Conservation area, RPGs											■	
Listed buildings											■	
View cone											■	
Historic Core Area											■	
Employment opportunities												■

6. Feedback from the consultation bodies on the scope of the SA report (Sustainability Appraisal Task A5)

6.1 Fulfilling the requirements of the Stategic Environmental Assessment legislation, the Council sought to make an early version of this scoping study (incorporating Tasks A1 to A4) available to the consultation bodies for feedback on the scope of the report. The Council made this document available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. This section summarises the feedback received, which is set out in Table 6.1.

Table 6.1: Key feedback received on early Sustainability Appraisal Scoping Study and Council responses from Natural England (NE), Environment Agency (EA) and Historic England (HE)

Respondent	Feedback provided	Council response
NE	Welcome the key issues identified within the report and support the SA objectives within the framework as they aptly cover our interests in the natural environment. We have no further comments to make on this consultation.	Feedback noted, no further actions proposed.
EA	Consider the SA Objectives highlighted in topic papers [Green Infrastructure and Biodiversity; Flood risk, SuDS and drainage and Natural Resources including air, water, soil quality and Infrastructure] of interest to the Environment Agency to be satisfactory.	Feedback noted, no further actions proposed.
EA	Agree with the key sustainability issues listed in Topic Paper 9 highlighted as issues for the Local Plan to address. Pleased to note in Topic Paper 9, that Oxford City Council will undertake a Water Cycle Study -WCS.	Feedback noted, no further actions proposed.
EA	*"Prioritising brownfield land for development may reduce opportunities for the remediation of contaminated sites which could be repurposed for public amenity or as green infrastructure with a focus on ecological/biodiversity functions."* If this is a key issue that the proposed plan will address, then the above point is not clear.	Background paper amended.
EA	Point also under *'Land/soils' should read; - "Restoration and protection of carbon-rich peat reserves that have already been degraded by historic development in the city."*	The Local Plan is limited in how it can drive restoration but point has been reworded in Background paper to try and accommodate.
EA	In Topic Paper 7, under the key issues for the Local Plan to address, the last bullet point should read; *"There will be residual risks of flooding after applying the Sequential approach Test to locating development and incorporating flood defence measures*.	Background paper amended.
EA	It is stated in Topic Paper 9 that; *"Oxford has seen significant industrial change to the present day in fact Oxford's industrial history has resulted in a substantial amount of land affected by contamination."* To further ensure the local plan addresses the protection of ground water resources, the Environment Agency's guidance on groundwater protection should also be referenced.	Background paper amended.
EA	In Topic Paper 14, under the issues for the Local Plan to address, the last bullet point should read; *Meeting the wastewater infrastructure needs of additional development in the city over the Local Plan period. This is because of the awareness of how challenging this issue is*. Also, in Topic Paper 14, the list of policy framework/plans, policies and programmes should include the forth coming Water Cycle Study.	Background paper amended, the Water Cycle study has been referenced in the water infrastructure sub-section of the current situation section of the paper. The study is also referenced in topic paper 009 which talks about water resources/quality more generally.
EA	Note the list in Section 3 A as well as in topic papers 5, 7, 9 and 14 of relevant Policies, Plans and Programmes and consider it satisfactory. The plan maker (Oxford City Council) would need to	Noted, we agree many of these resources are useful, though some of it is

	update the Strategic Flood Risk Assessment and Water Cycle Study evidence base to help them understand the impact of planned growth in Oxford City Council on flood risk, water quality and resources. We suggest the following are also added to the list as they are relevant to the preparation of the local plan. • Planning Practice Guidance - Flood risk section, • Environment Agency SFRA Guidance, • Flood and Water Management Act 2010, • Flood Risk Regulations 2009 , • Strategic flood risk assessment good practice guide. • Water cycle studies guidance • Water supply, wastewater and water quality - GOV.UK	practical guidance that may be better referenced elsewhere. Some are referenced in the relevant background papers, particularly BP007 on flood risk. Additionally, some of this guidance will be useful for preparing evidence base (SFRA and Water Cycle Study) and can be referenced there where appropriate.
EA	Regarding collecting baseline information: Advise a focus on updating the evidence base i.e. Strategic Flood Risk Assessment (SFRA) level 1 and 2 and producing the Water Cycle Study (WCS) which are useful in informing growth in Oxford City. Important to capture changes to national policy as well as to any flood map changes in Oxford, but also to understand the impact of growth on the water environment.	Noted, we have updated section 1.6 to flag we are aware of need for updating these docs and that this is happening in due course (as well as referring to them in relevant background papers).
EA	Consider that the environmental problems described in Section 5 (Table 5.1) highlight the main issues of relevance for the SEA topics/themes within the EA's remit. And the key environmental issues and trends which characterise Oxford appear to be highlighted. The Environment Agency would expect Oxford's local plan to cover the following topics, but not limited to: Net Gain; Flood risk management; Climate change; Strategic water planning; Drainage and infrastructure; Green and blue infrastructure; Contaminated land; Water Framework Directive objectives; Biodiversity; Waste management.	*For reference, Table 5.1 is now Table 4.1 in updated version of this report*. Comment is noted, the Regulation 18 first draft local plan addresses all these topics across its various draft policies (note some topics are grouped into other policies).
EA	Table 6.1: 'SA/SEA framework for plan objectives, alternatives and policies', the SA objectives and issues covered under the various SEA themes appear reasonable. Make the following suggestions: • SA objective 3: would be beneficial to include soil and land contamination under the issues that the 2042 plan will address, considering Oxford's industrial history which has resulted in a substantial amount of land affected by contamination. • For assessing the impacts of the sites and their ability to support sustainable development, we encourage the inclusion of a commentary section within the framework matrices to state, where necessary, the reasons for the effects cited and the score given to help explain the rationale behind the assessment results. This allows the transparency and also allows the reader to understand the rationale behind the scores given.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report*. SA objective 3 has been amended to make it clearer that land contamination would also be factored into issues considered. A comments box to record rationale for scoring of sustainability impacts in the site assessments is included alongside the score itself and would be used where necessary.
EA	It is important for alternatives to be considered from an early stage in the process. It appears an appraisal of Reasonable Alternatives	Comments are noted, for the Regulation 18

	has not yet been undertaken but will be carried out at the Regulation 18. The plan-maker may use a hierarchy to help identify suitable alternatives when considering plan options. The same hierarchy can be used to judge if suggested alternatives are reasonable, realistic and relevant. The diagram in Table 14 in Annex 5 of A Practical Guide to the Strategic Environmental Assessment Directive (publishing.service.gov.uk) contains further advice on developing and accessing alternatives can be found.	consultation, a Part 2 report is included as part of the Interim Sustainability Appraisal which addresses this.
EA	Other minor points: Please amend sentence in section 1.1 to: - 'It will need to include measures to improve public transport, protect the historic environment, protect and enhance the natural environment, and nature, reduce carbon emissions, and protect against flooding.' We agree with the key problems in Oxford outlined in section1.3. It will be useful for section 2.1 to include the fact Rivers form an intrinsic part of the unique environment of Oxford city and promotes tourism and a range of important water-based sports and social activities in the city. In Table 4.2: Current situation and likely future without the plan, we agree that without the 2042 plan, there will be Very negative impacts (compared to the current situation) on water resources. We note the Table states that the impact of the 2042 plan on water quality is unclear. We believe this is likely to end up being positive (compared to the current situation). This is because of the willingness by Oxford City Council to address water quality issues by engaging with the Environment Agency as well as working on producing a Water Cycle Study evidence to inform growth in Oxford City.	Report has been amended in response to these points.
HE	The Scoping Report is light on detail about heritage policies, plans and programmes, and Background Paper 11 includes only some of this content (principally within a section on "Current situation"). Analysing this in more detail, SA Objective 11 considers both designated and non-designated heritage; but the background paper centres only on designated assets. We recommend strengthening the SA baseline by updating Background Paper 11 and adding more detail that connects with designated and non-designated assets and associated programmes, such as the Oxford Heritage Asset Register and work on the local Historic Environment Record. Also, this would offer an opportunity to recognise the extent and nature of non-designated archaeological remains in Oxford which have been discussed during LP2040 production.	Background paper amended, additional detail added to section 2 and 3 including highlighting the presence of non-designated heritage.
HE	Need to correct Background Paper 11 regarding entries in Oxford on the national Heritage at Risk Register (the wrong 3 assets are listed) and we recommend liaison with the Council's conservation team regarding the position on local buildings at risk.	Background paper amended, references have been updated to reflect the current situation.

HE	The Cowley study merits inclusion in any revised Background Paper 11, as an important piece of the Council's expanding evidence base.	Background paper amended, reference to the emerging work has been added.
HE	We are broadly comfortable with the proposed SA Framework and draft objectives. Regarding decision-making criteria, SA objective 11 should refer to setting and/or the interests that collectively comprise significance. A focus solely on archaeological or historic features within the site could miss wider impacts and opportunities. Potential wording for consideration: "~~Does~~ Is development of the site likely to affect the significance (including the setting) of one or more heritage assets, including ~~contain~~ any associated historic~~al~~, ~~or~~ archaeological, artistic and/or architectural interests ~~features~~?"	Decision-making criteria related to Table 5.12 has been updated for the site assessment framework using suggested wording.
HE	Page 14: presumably the Scoping Report will be updated to reflect recent announcements regarding support for growth in the Oxford – Cambridge corridor. Page 25: Unsure that a future without a new local plan can be considered positive for heritage. Note in background paper 11: "For Oxford, this lack of local level policies could present a real risk to the unique heritage of the city. "	The scoping report has been updated to reflected the recent announcements. In relation to likely future without a new local plan, the policies of the LP2036 would continue to apply and there would remain strong protection through national policy, though we assessed that positive impacts would be reduced in this scenario due to reduced ability to respond to ongoing pressures or changes in local context. We are happy to discuss this detail further however.
HE	Page 32: we advise minor wording changes to the text linked with SA objective 11 in Table 5.1, specifically we suggest: • revised wording for the second bullet, focusing on formal assessment of heritage impacts, rather than consideration of impacts on archaeological and historical value: "Potential heritage impacts of new development proposed in the plan should be assessed, both in terms of any direct physical impacts and impacts on setting ~~on areas of archaeological and historical value should be considered~~." • Revised wording for the third bullet, adding reference to heritage significance and the challenges arising from the intensification of existing sites: "Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure	*For reference, Table 5.1 is now Table 4.1 in updated version of this report.* We have made amendments to the text in response to these points.

	continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character."	
HE	Pages 37 – 39 (Table 6.1): as the Council is aware, "non-heritage" themes such as carbon emissions and green infrastructure have a heritage dimension. No major changes to the approach suggested – though reference to heritage is worth considering as an issue for SA Objectives 1, 2 and 7 and 12. There is scope to embed such nuance in other relevant topic papers as appropriate, which in turn inform relevant sections of the new plan, and potentially Table 6.2. We look forward to continuing our positive engagement with the Council on the cross-cutting nature of heritage. Also note, for objective 11 the issues should also include other non-designated assets, not just those of local importance.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report.* Comments around cross-cutting nature of heritage are noted and something we will keep in mind as we prepare the plan. Objective 11 has been tweaked re: non-designated assets.
HE	Page 44 (Table 6.12): we suggest deleting "(Scheduled Ancient Monument)" in the top row. Including only Scheduled Monuments implies non-designated archaeological assets of national importance are not treated in the same way, which we do not believe is the intention.	*Table 6.12 now Table 5.12 in updated draft in the updated version of the report.* We have updated the wording to reflect that Scheduled Monument is one consideration (but may not be the only one).
HE	Strongly recommend liaison with the Council's conservation team and archaeological advisers to inform the approach to SA. They are best placed to advise on: local historic environment issues and priorities.	Comment is noted.

7. Conclusions

7.1 This Part one Interim Sustainability Appraisal Report addresses the scoping stages of the Sustainability Appraisal process. It sets out the key baseline information and existing issues for the city which the new Local Plan will need to respond to, which are expanded upon further in the associated background papers informing the Regulation 18 consultation. It also sets out the SA/SEA assessment framework which is derived from 12 Sustainability Objectives, which will be used to appraise the emerging Local Plan.

7.2 An early draft of this report has been shared with members of Natural England, the Environment Agency and Historic England, and their feedback has been incorporated into the version of the report that has been published for the Regulation 18 consultation. Additional feedback provided as part of the Regulation 18 consultation will help to inform the review process and any necessary updates as the Council prepares its Regulation 19 Sustainability Appraisal.

Oxford Local Plan 2042

Interim Sustainability Appraisal report - Part two (Options Appraisal)

1. Introduction 1

2. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1) 3

2.1. Developing the Local Plan vision 4

2.2. Testing the Local Plan themes and objectives 6

3. Exploring options for the emerging Local Plan 2042 (Sustainability Appraisal Tasks B2 and B3) 10

3.1. Developing the growth strategy for Local Plan 2042 10

3.1.1. Identifying reasonable alternatives for Local Plan growth strategy 10

3.1.2. Testing the growth strategy alternatives 13

3.1.3. Findings from the testing of growth strategy alternatives 22

3.2. Developing Local Plan policy approaches 23

3.2.1. Identifying options for policies and considering sustainability impacts 23

3.2.2. Targeted Sustainability Appraisal for scoped in policy options sets 26

3.2.3. Identifying a preferred option for policies and reasons for rejecting other options 34

3.3. Developing Local Plan site allocations 37

3.3.1. Identifying potential development sites in the city 37

3.3.2. Testing and refining site allocation for the Local Plan 2042 38

3.3.3. Next steps for Local Plan 2042 site allocations 40

4. Interim whole plan appraisal (Regulation 18 consultation preferred approaches) 41

5. Conclusions and next steps 50

1. Introduction

1.1 Part 1 of the Regulation 18 Interim Sustainability Appraisal (SA) report addressed the scoping stages of the SA process, including: a review of relevant policies, plans and programmes and sustainability objectives; collection of baseline information informing the sustainability context; identification of key issues and problems; and development of the

SA/SEA framework. Together these addressed the requirements of Stage A and tasks A1-A5 of the Sustainability Appraisal process.

1.2 This Part 2 report details the appraisal of emerging options and alternatives for the Local Plan and which has informed the preferred approaches set out in the Regulation 18 first draft Local Plan consultation document. The Part 2 report is broken down into several sections which are as follows:

- Section 2 presents an appraisal of the Local Plan 2042 themes/objectives which support the wider vision is presented, which helps to identify how these align with the SA objectives discussed in Part 1 and where there could be possible conflicts that need to be addressed.
- Section 3 details how options for the Local Plan approaches have been developed. This section includes an appraisal of reasonable options for growth that have been considered for the overall Local Plan growth strategy; and then moves on to appraising options for policies where the wider plan-making process has identified that options could result in likely significant effects. The section concludes by detailing the process that is being carried out for identifying site allocations.
- Section 4 of the report then presents a high-level appraisal of the overall Regulation 18 first draft Local Plan, based upon preferred approaches presented in the consultation and the analysis undertaken on different elements of the emerging plan as were covered in the earlier sections. It begins to discuss where mitigations are proposed to address potential likely significant effects, which will be fleshed out further in preparing the Regulation 19 consultation.
- Section 5 sets out some conclusions and next steps.

1.3 The SA/SEA framework which was set out in Section 5 of the Part 1 report is referred to throughout this report and is reproduced in Table 1.1. This report utilises the same scoring matrix for impacts as was presented in Part 1 of the report, which is set out again in Table 1.2.

Table 1.1: The SA/SEA framework used to assess the impacts of the new Local Plan policies.

SA/SEA Framework
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

5. To reduce poverty, social exclusion, and health **inequalities**.
6. To provide accessible essential **services and facilities**.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.
9. To achieve **water** quality targets and manage water resources.
10. To conserve and enhance Oxford's **biodiversity**.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

Table 1.2: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	**++**
Positive impacts (compared to the current situation)	**+**
Neutral / none	**0**
Some positive and some negative impacts	**+/-**
Negative impacts (compared to the current situation)	**-**
Very negative impacts (compared to the current situation	**--**
Unclear	**?**

2. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1)

2.1 The Local Plan 2042 will become the key planning document through which the vision for Oxford as a city by 2042 can be secured and implemented. The development of the Local Plan 2042 offers a fresh opportunity to look at the current context of sustainability issues, challenges and opportunities, alongside local, regional and national priorities, in order to produce an appropriate strategy and planning policy framework for the city.

2.2 Following on from the scoping stages of the Sustainability Appraisal process, as were presented in Part 1, this section of the part 2 report discusses the development of the Local Plan 2042 vision, themes and objectives and includes an appraisal of them against the SA framework.

2.1. Developing the Local Plan vision

2.3 The Local Plan 2042 is being guided by the vision that was driving the development of the Local Plan 2040 and that has already been subject to public engagement and feedback throughout the Local Plan 2040's preparation. The vision has been reviewed in light of the scoping undertaken as part of the early work in developing the Local Plan 2042 as was set out in the SA report part 1 and the associated background papers accompanying the Reg 18 consultation. Whilst it includes some minor modifications to reflect the updated time period for the Local Plan and feedback during the Local Plan 2040 Reg 19, the Council proposes that this remains a strong and relevant guide for the new Local Plan's development. It is as follows:

> *In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.*

2.4 The vision for the Local Plan 2042 is underpinned by six themes which were crafted through the Local Plan 2040's early development. These six themes were adapted from the three pillars of sustainable development (Society, Environment and Economy) and the intersects between them.

2.5 In turn, each of the six themes for the Local Plan 2042 are supported by a grouping of more specific Local Plan objectives. These objectives add greater detail to how the Local Plan will seek to deliver upon the themes and overarching vision, and more specifically respond to the particular sustainability issues, as well as local, regional and national

priorities identified in the SA report part 1 and the associated Reg 18 consultation background papers.

2.6 In practice, there is overlap between the themes and the objectives, and these could ultimately be grouped in a variety of ways. Indeed, the specific objectives can be integral to multiple themes, and conversely, the themes are influenced by multiple objectives.

2.7 As with the vision, the Council has reviewed the scope of the themes and objectives as part of its early work on the Local Plan 2042. This was important for determining whether these remained relevant or whether contextual changes since they had first been prepared suggested amendments were needed. Following that review, it is proposed that the six themes generally continue to be an effective and relevant framework through which to structure the new Local Plan, though various modifications have been made to the underlying objectives. The six themes and the updated objectives are presented in Table 2.1.

Table 2.1: The six Local Plan 2042 themes and underlying objectives

Local Plan 2042 theme	**Underlying Local Plan 2042 objectives**
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient to climate change.	• Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city.

	• Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Demonstrate we value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

2.2. Testing the Local Plan themes and objectives

2.8 The six themes, including the underlying objectives that comprise them, are central to achieving the overall vision. As such, these have been assessed against the twelve Sustainability Appraisal objectives to identify where there is potential for positive/negative/neutral or uncertain impact and the results of that assessment are presented in Table 2.2.

Table 2.2: Appraisal of Local Plan 2042 themes against SA Objectives

	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic	12. Employment and economy

											environment	
A healthy and inclusive city to live in.	-	0	0	++	+	?	0	+/-	-	0	0	+?
A green and biodiverse city that is resilient to climate change.	0	++	+	-	+	+	++	0	+	++	0	+/-
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	-	0	0	-?	+	0	0	-	0	0	0	++
A liveable city with strong communities and opportunities for all.	+	0	+	0	+?	++	0	+	0	0	0	+
A city that respects its heritage and fosters design of the highest quality.	+/-	+/-	0	-	+?	0	+?	0	0	+?	++	+/-
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	++	0	?	0	+?	0	0	+	+	+	+/-	0

2.9 The assessment as set out in Table 2.2 identifies that, taken as a whole, the six themes address each of the 12 SA objectives with varying degrees of impact. There are a significant number of areas where the six themes represent positive or significant positive impacts in relation to the SA objectives and suggests that they are generally compatible. There are, however, elements of each of the themes which represent negative impacts with the SA objectives, or else less certain impacts and potentially suggest conflicts which may need to be managed. The rationale for the negative or uncertain scores is discussed below, this is followed by a short commentary on what the impacts mean for developing the Local Plan going forward.

Table 2.3: Rationale for negative or uncertain scoring of Local Plan 2042 themes/objectives against the 12 Sustainability Appraisal criteria as were presented in previous table.

A healthy and inclusive city to live in	• Negative impacts identified against SA criteria 1 and 9, because new housing required to help meet identified needs will represent additional carbon emissions and water demands, though this could be mitigated to some degree with appropriate design standards. • Some positive impacts for criterion 8 where new housing can reduce commuting for Oxford employees currently forced to live further afield, however, more residents could increase local congestion resulting in negatives. • Uncertain positive impact against criterion 12, as new housing may improve employers ability to retain staff, however, depends on implementation. • Uncertain impact against criterion 6, new housing may help residents locate closer to services, improving access, however, it may also increase pressure on existing services unless commensurate contributions are secured to mitigate these pressures, impact is less clear and depends on implementation again.
A green and biodiverse city that is resilient to climate change	• Some negative impact against criterion 4 because the additional constraints presented by protecting green networks is likely to reduce availability of sites for housing and could reduce capacity of sites in terms of amount of housing delivered. • Some positive and some negative impacts for criterion 12, in that incorporating green infrastructure and generally making space for nature can help to boost market values of various uses and may make city more attractive to employers, however, additional constraints presented by protecting green networks could reduce ability of employers to expand.
A fair and prosperous city with a globally important role in learning, knowledge and innovation	• Negative impact identified against SA criteria 1 and 8, because new employment in the city, without commensurate housing could lead to increased numbers of commuters into the city with associated carbon emissions (at least in short term until fossil fuel vehicles are phased out). Additional employment growth, particularly high energy demand uses, will likely have additional associated carbon emissions (e.g. if energy demand is not sourced renewably), though again this could be mitigated somewhat with appropriate design standards. • Uncertain negative impact against criterion 4, if additional employment generates more staff needing housing in the city, though depends on where staff are coming from (they may already be local).
A liveable city with strong communities and opportunities for all	• Uncertain positive impact against criterion 5, if improvements in accessibility to services and other facilities across the city can be secured, then this may help to reduce various health and economic inequalities amongst Oxford's communities, although it is highly dependent on how various policies and DM decisions are ultimately implemented.

A city that respects its heritage and fosters design of the highest quality	• Some positive and some negative impacts for criteria 1 and 2, in that high-quality design could help to secure reductions in carbon emissions and deliver climate adaptation. However, sensitivities around heritage assets may limit scope of the actions that can be taken in new development if it could impact these, or it may mean existing emissions/ climate vulnerabilities affecting heritage assets remain locked in. • Protecting existing heritage assets may help to preserve Oxford's special qualities which draw tourists yearly and support economy, however, heritage constraints may reduce scope of employment uses to expand, thus positive and negative impacts under criterion 12 also. • Uncertain positive impacts for criteria 5, 7 and 10, because high quality design could mean ensuring new development is designed to support health and wellbeing of occupants, and also respects existing green features/biodiversity or brings forward enhancements/net gains as part of design, but depends upon implementation. • Likely to be some negative impact for criterion 4 where existing heritage constraints might reduce capability to maximise capacity of sites for new housing.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon	• Some positive and some negative impacts for criterion 11, whereby net zero standards and need to mitigate impacts on wider environment from new development could drive more efficient design and higher quality development overall, however, some net zero design measures may not be compatible with existing traditional buildings or protected heritage assets, also the improved performance of buildings may reduce scope of design (functionality prioritised over beauty). • Uncertain positive impacts for criterion 5 because net zero design could help to reduce risks of occupants being exposed to fuel poverty, high energy bills, thus improving economic resilience. • Uncertain impact for criterion 3, whereby improved practices around use of soils might secure some positives on previously degraded soils, but often this will represent purely mitigation of impacts to stop further degradation, so unclear.

2.10 Of course, the six themes will work together as a whole, and identified positive or negative impacts in Table 2.2 do not consider the potential counterbalance in impacts that can occur under other themes. Areas of negative impact, as discussed in more detail above, do help to highlight areas where particular care will need to be taken around whether mitigation is needed. Equally, positive impacts identified can be considered as opportunities that the Council should seek to preserve as the Local Plan develops.

2.11 The benefit of the testing is in helping to understand where there is potential for impacts that may need to be explored further as the additional detail of the Local plan strategy and its policies emerges, as is the focus of the following sections.

3. Exploring options for the emerging Local Plan 2042 (Sustainability Appraisal Tasks B2 and B3)

3.1 The following sections set out how the Council has explored options for the Local Plan 2042 and come to the preferred options as presented in the Regulation 18 consultation's first draft Local Plan.

3.2 Firstly, the development of an appropriate overarching growth strategy for the Local Plan 2042 is discussed. Following this, consideration is given to thematic policy areas, before moving on to discuss work to explore site allocation options. A concluding section then draws matters together, considering the emerging preferred approach as a whole.

3.1. Developing the growth strategy for Local Plan 2042

3.3 There is more than one way of trying to meet the needs of residents, workers and visitors to Oxford and achieving the various objectives that have been identified for the new Local Plan. Oxford is a constrained city and there is insufficient land to meet all of the city's development needs within its boundary, but from this starting point there are a range of alternative approaches to explore. At the heart of this is a need to explore ways of balancing housing and wider development needs with objectives which could constrain growth, including relating to protecting and enhancing Oxford's sensitive environment and many heritage assets.

3.1.1. Identifying reasonable alternatives for Local Plan growth strategy

3.4 Responding to key sustainability issues affecting the city, the Council has considered a number of potential growth strategy options (collectively 'alternatives') for the Local Plan 2042. The emerging preferred approach to growth (or 'preferred option', PO) involves striking a balance between providing for housing and employment land / floorspace (henceforth floorspace) needs whilst also delivering on wider plan objectives.

3.5 The primary focus under this emerging PO is planning for new homes, responding to the significant pressure in the city for improving access to housing and addressing ongoing affordability issues. The government's standard method identifies the housing need for the city. However, the constrained nature of the city means that a capacity-based requirement would be planned for under the PO, i.e. the requirement would be below identified need.

3.6 This shortfall could be met by neighbouring local authorities, but there are risks and uncertainties with any such strategy, such that there is a need to explore higher growth options with a view to ensuring that the Council has left 'no stone unturned'.

3.7 With regards to employment floorspace, under the emerging PO needs would be provided for almost in full, responding to the city's strong performing economy, particularly through a focus on intensifying and modernising key employment sites; however, some specific needs may not be met because land is prioritised for accommodating housing need. There is clearly market demand (as distinct from established need) to deliver a considerable further boost to employment floorspace, at least in the short term; however, on the other hand, a lack of available housing for workers is a key barrier to the city's economic growth.

3.8 Overall, it is recognised that there is an argument to be made for boosting employment floorspace supply (over-and-above the emerging PO), such that this is also something to explore further through appraisal of (and consultation on) growth strategy alternatives.

3.9 In summary, in addition to appraising and consulting on the merits of the emerging PO, there is a need to explore alternatives involving a boost to housing and/or employment.

Defining the alternatives in detail

3.10 Beginning with the emerging PO which, as discussed, involves striking a careful balance, there is a need to distinguish between choices made at two spatial scales:

- City-wide – striking a balance means: A) supporting redevelopment of all available brownfield sites; and B) taking forward select greenfield sites, whilst also protecting a strong hierarchy of green and blue spaces that perform important functions like making space for biodiversity, flood resilience and physical/mental health.
- Site level – striking a balance means maximising capacity / development yields whilst also accommodating other features intrinsic to sustainable, healthy and well-designed places – like appropriate greening, open space, measures supporting active travel – and designing with onsite or nearby heritage and environmental assets in mind.

3.11 With regards to boosting supply, this might be achieved broadly by: A) boosting capacities at brownfield sites; or B) boosting greenfield supply from additional sites (though it should be noted that there is a very limited supply of additional greenfield sites without intrinsic constraints like flood plain, or national designation) and/or supporting increased capacities at greenfield sites.

3.12 As such, there are three broad alternatives:

1. The emerging PO (striking a balance)
2. Boost brownfield supply (boost site capacities)
3. Boost greenfield supply (boost sites and/or site capacities)

3.13 With regards to (2) and (3), the aim would be to provide more fully for development needs and drive greater quantums/densities of development across available sites whilst reducing alignment with wider plan objectives. This could be achieved by:

- Minimising any locally set policy requirements that could restrict development capacity on sites, including expectations around environmental enhancements.
- Protecting only the open spaces that have intrinsic constraints on development, such as areas of flood plain, or nationally designated ecological or heritage sites, and limiting consideration of wider benefits that many of other spaces provide.

3.14 However, it is important to be clear that the above would only be within reason - significant negative environmental effects would need to continue to be avoided/mitigated. There will also be intrinsic constraints such as flood risk, nationally designated biodiversity and heritage, which make development in certain locations inappropriate.

3.15 Finally, there is the question of policy support for housing versus employment.

3.16 The emerging PO, as discussed, can be described as a strategy that is weighted towards supporting homes, which in practice means intervening to curb very high current market demand for employment floorspace, but there is also a need to consider the alternative of reduced policy support for housing / increased flexibility for employment.

3.17 What this means in practice is either:

- Prioritising housing – policy emphasis on bringing forward new housing sites and additional housing on existing sites; and resisting any net loss of housing and encouraging alternative uses to convert to (or incorporate an element of) housing where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then, seeking to meet employment land / floorspace needs through policies which focus primarily on protecting and intensifying only key existing employment sites.
- Prioritising employment – policy emphasis on driving the intensification and expansion of existing employment sites or delivering new employment sites; and resisting the net loss of employment floorspace and setting policies for the protection of a range of employment sites (sites of national, regional and local importance); also encouraging alternative uses (not residential) to convert to uses that can deliver more employment where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then seeking to provide for housing need through policies which focus on bringing forward new housing sites and additional housing on existing sites.

3.18 This leads to six reasonable alternative growth strategy options as are illustrated in the matrix in Table 3.1.

Table 3.1: Growth strategy alternatives considered for Local Plan 2042.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (Preferred option)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

3.1.2. Testing the growth strategy alternatives

3.19 In order to explore the potential impacts arising from the growth strategy alternatives, these have been appraised against the 12 Sustainability Appraisal criteria using the same scoring mechanism as is used elsewhere in this report (see Table 1.2).

3.20 The detailed appraisal is set out in Table 3.2, followed by a concluding discussion.

Table 3.2: Detailed appraisal results for Local Plan 2042 growth strategy alternatives including commentary explaining rationale

SA Objective	Growth options						Appraisal rationale
	1a	1b	2a	2b	3a	3b	
1. Carbon emissions	-	--	-	--	--	--	• Assume negative impact in terms of emissions under all scenarios because more development is likely to equate to more emissions. • Option 2a will result in more housing than option 1a/1b, however, may reduce in-commuting as more employees able to live closer to work. • Options 1b, 2b and 3b will result in more employment generated without commensurate housing and therefore more commuters into city, with associated additional transport emissions. • Option 3a could reduce commuting levels, but also brings in additional housing development than other options so similar level of impact to 3b and 2b.
2. Resilience to climate change	+	+	+/-	+/-	--	--	• Option 1a and 1b allow protection of a range of green spaces that help with reducing overheating and flood risk. They would also allow a balanced approach to the design of sites, fully utilising capacity for development, whilst also providing for range of greening and open space that helps resilience. • Option 2a and 2b would seek to fully maximise already developed sites, potentially able to protect a similar network of green spaces as under options 1a/1b. However, the minimal local standards that would facilitate maximising sheer quantity of development could reduce ability to deliver resilience measures like greening onsite. • Options 3a and 3b would potentially see development across a range of green spaces, impacting local resilience. Whilst the most high-risk spaces for flooding (e.g. floodplain) would not be developed, thus retaining some resilience, other spaces that still provide important resilience (e.g. slowing water run off and storing water, as well as urban cooling), could be lost.
3. Efficient use of land	+	+	+/-	+/-	--	--	• Options 1a and 1b perform best as development would be required to maximise capacity of sites whilst also delivering upon wider LP objectives, coupled with

							protection of a network of greenfield sites and steering development to brownfield spaces first (though not ruling out lower quality green sites). • **Option 3a and 3b are considered least efficient because of potential for loss of a range of green spaces including more valuable green spaces in the city. It is likely that more development of green sites will harm more areas of soil which have not already been impacted by development (another consideration under this objective). More potential greenfield sites for development could also reduce the pressure to maximise the efficient use of brownfield sites first. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which could impact efficiency in terms of meeting all objectives.** • **Options 2a and 2b are likely to have some positives and negatives. Though some greenfield sites would still be allocated under these scenarios, these options would encourage the maximising of previously developed sites in the city which is considered to be a very efficient use of land. However, as with options 3a and 3b above, there is potential that in the drive for maximising the quantums/density of development on brownfield sites at the cost of securing other measures on these sites, such as additional greening, open space, would lead to less efficient developments in the round.** • **A contrary view is that option 2a and 2b are most efficient for delivering highest densities of development on brownfield sites in the city whilst protecting greenfield land, so these could be scored higher if a view of efficiency was more solely focused just on this element of the issues covered under this criterion.**
4. Local housing needs	**+**	**+/-**	**+**	**-**	**++**	**-**	• **All options will provide some level of additional housing having a positive impact, though the housing focus of options 1a, 2a and 3a will have greater positive impact and are likely to support greater provision for meeting housing needs of various groups (e.g. need for affordable housing).** • **Options 2a and 3a would each go further towards meeting a greater proportion of housing needs than 1a because they would seek to drive greater quantums/capacity of development whilst reducing other provisions on site (though still unlikely to meet need in full). Option 2a is not considered significant positive, as even maxing out development capacity on sites is unlikely to have**

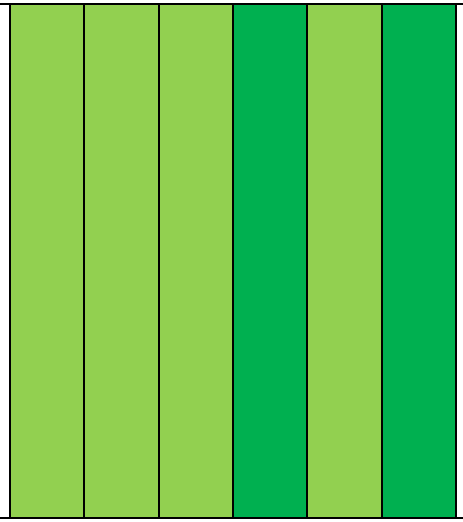
							potential to contribute any significant additional housing capacity as the sites are already quite constrained, although it would likely be somewhat higher than option 1a. • Option 1b, 2b and 3b would provide some housing, but the focus on delivering to meet employment need first is likely to then exacerbate existing housing need (generating more jobs and more people needing to places to live). This indicates a score that reflects some positives and negatives for option 1b. • Option 2b and 3b would also provide some housing, though the focus of using the additional capacity unlocked on brownfield (as under 2b) or greenfield sites (as under 3b) would firstly be for employment. Overall, the potentially greater levels of employment generated in the city under these options would exacerbate housing need further and outweigh positives, leading to minor negative impacts.
5. Inequalities	**?**	**?**	**?**	**?**	**?**	**?**	• The impact of the options on inequalities will depend heavily on implementation and is difficult to score at this level. It is likely that all options will make some contribution to elements of inequality, however, such as access to affordable housing or access to jobs skills. Specific impacts will depend on how particular applications come forward.
6. Services and facilities	**+/-**	**+**	**+/-**	**+**	**-**	**-**	• More housing, particularly on brownfield sites, under options 1a and 2a will mean more people can live in accessible locations that allow them to reach various daily needs via active travel. However, additional residents could put strain on existing services if these are not enhanced or added to, or if existing facilities are allowed to be lost. • Additional growth in employment uses under option 1b, 2b and 3b could include uses that provide for daily needs of the local population which may therefore improve access—this will be slightly more positive under the brownfield focused options than greenfield, which could see some of these uses located in less accessible locations too (so may depend on implementation somewhat). The reduced population growth under these scenarios would still include some additional pressure, however, but less so than under housing focused scenarios. • Greenfield sites in the city are less likely to be located in accessible locations, though some areas will be more accessible than others. When this is combined

							with the more significant population growth associated with more housing accommodated across greenfield sites, this leads to a more negative impact under option 3a. The same accessibility concerns would impact the greenfield sites if employment instead came forward (as under option 3b) and could also mean employment generated away from existing employment clusters, although additional pressure on existing services from new housing may be reduced compared with scenario 3a. • There is, however, an element of uncertainty to these scores as it should be acknowledged that any viable sites may be able to deliver additional public benefits, including new community infrastructure.
7. Green infrastructure, leisure and recreation	**+**	**+**	**+/-**	**+/-**	**--**	**--**	• Options 1a and 1b have some positive benefits. The balanced approach to requiring development to maximise quantums/density whilst also delivering upon wider LP objectives will allow for development to incorporate a range of new green features (or protect existing features). This is coupled with protection of a network of greenfield sites (though not ruling out lower quality green sites) across the city which will contribute to a strong GI network. • Options 2a and 2b are unlikely to be able to secure as significant benefits on brownfield sites because they would sacrifice additional local standards for environmental enhancements like greening and open space in order to maximise development quantums/density. However, they would still allow for protection of a network of green infrastructure across the city (though some lower quality greenfield sites would be allocated). • Options 3a and 3b will be significantly negative because of potential for loss of a range of green spaces including more valuable green spaces in the city. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which leads to less efficient developments too.
8. Traffic and associated air pollution	**+/-**	**-**	**+/-**	**-**	**-**	**--**	• Under all options, it is assumed that air quality impacts will continue to reduce as vehicles shift away from fossil fuel burning, and wider county measures such as LTNs, expansion of the Zero Emissions Zone and electric bus fleet introduction

							take affect. However, emissions impacts will continue to some degree, particularly in earlier years of the Plan. • Option 1a, 2a and 3a would help to reduce the imbalance between those working in Oxford but being forced to live further afield and having to commute in for work, by providing more housing in the city (increasing levels for 2a and 3a). • However, under the same options, the associated increases in population associated with greater levels of housing could bring additional vehicles into the city (meaning some negative impact). Though private vehicle ownership may be tempered by reduced levels of parking provision that would be necessitated by low parking requirements, but also because maximising density of development of sites will mean trade off with space for parking. • Additionally, under option 3a, some of the greenfield housing sites coming forward for development are likely to be in less easily accessible locations which may increase reliance on private vehicle ownership (pushing this option into predominantly a negative impact score). However, this negative might be reduced where there is a major focus on greenfield that can deliver sustainable transport improvements. • Options that focus on boosting employment/economic growth risk further exacerbating the imbalanced commuting patterns in the city, particularly where job creation is not matched with housing provision. The result is likely to mean more people travelling into city, some via private vehicles. This is likely to result in negative impacts under options 1b and 2b, and more significant negatives under 3b, due to it enabling greater expansion of employment floorspace as well as new sites in less accessible locations (including away from existing employment clusters).
9. Water	**+/-**	**+/-**	**-**	**-**	**--**	**-**	• For water, there is a need to consider both water resources/supply and water quality including impacts on wastewater infrastructure (although a scheme has been agreed with Thames Water to bring upgrades to the local wastewater treatment works to address existing capacity concerns and unlock future growth). • Options 1a and 1b would both generate housing, (more so under option 1a), and this will increase demand for water, as well as pressure on wastewater infrastructure. However, there will be greater opportunities to mitigate impacts

							from development on water quality because of the more balanced approach to design on sites. Some development capacity is afforded to environmental improvements like greening, open space, SUDs and buffers along watercourses. • Maximising the development quantums on brownfield sites not only increases amount of housing that can be delivered (with additional demands on water resources and wastewater treatment), but also minimises the environmental features that can mitigate impacts on water quality, leading to negative impacts under options 2a and 2b (2a is likely slightly more negative than 2b in terms of impact on water resources/wastewater). • Option 3a and 3b have similar impacts as options 2a and 2b, however, the more expansive loss of greenfield sites across the city will have greater impacts on the water environment. For example, more urbanisation and loss of natural surface cover could exacerbate surface water run-off, leading to flooding and additional pollutants running into watercourses, though this may be mitigated somewhat depending on how SUDs are applied. However, the impact under 3a is more significant due to the additional amounts of housing that would come forward, with associated demands on water resources/wastewater.
10. Biodiversity	**0**	**0**	**0**	**0**	**-**	**-**	• Outside of the Local Plan's control, under all options, development will be expected to deliver the mandatory 10% Biodiversity Net Gain associated with the Environment Act, so there should generally be positive impacts in terms of habitat creation. However, the nature of many sites in Oxford is that BNG is likely to need to be delivered offsite. • The loss of greenfield sites under scenarios 3a and 3b is likely to lead to some additional fragmentation of habitats and wildlife corridors. On the assumption that some BNG will need to be delivered offsite, the limited opportunities to deliver locally in the wider city could be reduced further if greenfield sites are taken forward for development, meaning that this could be pushed further outside of Oxford. Allowing more development of greenfield sites would have additional negative impacts if this extended to local designated sites, although it is assumed national designations (e.g. SAC and SSSIs) would still be protected as minimum. • Options 1a, 1b, 2a, and 2b would likely lead to a neutral impact. They would retain a broader network of greenfield sites which would include national and local

							designated sites and would help to maintain wildlife corridors/linkages across the city. Options 1a and 1b would, however, also allow for incorporating space for greening and other non-habitat ecological enhancements (e.g. features not recognised by the DEFRA BNG metric's habitat focus). This means that spaces for biodiversity could be incorporated onsite, to the benefit of species including priority species, even if onsite BNG is not feasible. Uncertain whether this would push the options into a positive impact or maintain neutral impact, however.
11. Good urban design / the historic environment	+	+	--	--	--	--	• Good urban design requires a balancing of various requirements on a development, not just the maximising of density. As such, options 1a and 1b would have positive impacts because of the balanced approach they would push for. These options would also allow for incorporating policies that guide design towards sufficiently mitigating harm (and ideally enhancing the setting of) various local and national designated (and non-designated) heritage assets. • Options 2a/2b, and 3a/3b which focus on maximising density on brownfield or greenfield sites, could have significant negative impacts for design as they forgo other design considerations in order to maximise sheer quantums of development/density of development on these sites. • In addition, for options 2a/2b/3a/3c, the minimised local standards necessary to reduce constraints on development quantums/density would likely reduce the ability to influence design with respect to local context, such as the wealth of historic assets in the city. Equally, many brownfield sites are clustered closest to the city's dense array of heritage assets, meanwhile, some of the only greenfield sites that could feasibly be explored under options 3a/3b (and that have not otherwise been ruled out for other reasons like floodplain or ecology), make an important contribution to Oxford's historic setting and townscape. Thus, additional development under these scenarios is considered to have potential for significant negative impacts on heritage in the city.
12. Economic growth	+	+	+	++	+	++	• All options are considered to have some level of positive impact for the economy in Oxford, though options 2a and 3a would bring more significant positive impact. • Housing delivery is a key barrier to economic growth as businesses struggle to retain or attract staff due to inability to access affordable housing nearby, thus the

							**housing focus scenarios would have some positive impact for economic growth in this way.** • **Option 1b, 2b and 3b are focused on employment/economic growth. These will ensure a wide network of protected sites are protected from loss of employment uses including locally, regionally and nationally important sites, even if these sites are not currently performing.** • **Options 2b and 3b will more easily facilitate increases in employment floorspace by allowing existing sites to expand/intensify fully and allow new sites to come forward, particularly under option 3b which would allow development on more greenfield sites.** • **Regardless of the option taken, there will likely continue to be competition from high value employment uses which could push out lower value employment and reduce access to affordable workspaces and lower skilled jobs.**

3.1.3. Findings from the testing of growth strategy alternatives

3.21 Table 3.3 presents a summary of the appraisal scoring for each of the six growth strategy alternatives as was detailed in the previous section (Table 3.2).

Table 3.3: Summary of appraisal results for Local Plan 2042 growth strategy alternatives

SA Objective	Option 1A	Option 1B	Option 2A	Option 2B	Option 3A	Option 3B
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?
6. Services and facilities	+/-	+	+/-	+	-	-
7. Green infrastructure, leisure and recreation	+	+	+/-	+/-	--	--
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--
9. Water	+/-	+/-	-	-	--	-
10. Biodiversity	0	0	0	0	-	-
11. Good urban design / the historic environment	+	+	--	--	--	--
12. Economic growth	+	+	+	++	+	++

3.22 Option 1a, the balanced approach to growth with a housing focus, is clearly shown to perform well, in that it is associated with comfortably the most positives and fewest negatives. It is recognised that there is also a case to be made for options 2b, 3a and 3b from either a housing (option 3a) or an economic growth perspective (options 2b and 3b), but these benefits come at a considerable cost in terms of wider sustainability objectives.

3.23 The view of Officers at the current time – subject to further work, discussion and consultation – is that option 1a represents sustainable development on balance. As part of this, it is important to be clear that option 1a would provide significantly for housing

delivery, thereby contributing strongly to meeting locally arising needs (but still likely generating unmet needs) and would make a positive contribution to economic growth, specifically by protecting key employment sites and enabling their intensification/modernization whilst also contributing new housing to reduce barriers for employees wanting to live closer to where they work. It would also allow a strong framework to be set out for protecting and enhancing the wider environment and securing various benefits for the health and wellbeing of the city's residents and visitors.

3.2. Developing Local Plan policy approaches

3.24 This sub-section of the Sustainability Appraisal discusses the development of the specific policy options for the Local Plan 2042. The preferred options document sets out a number of preferred policies which have been put forward in response to the known issues and challenges within the city and these are collected into chapters that follow the various Local Plan 2042 themes. Various options have been considered for these policies and the process of determining the preferred approach has been informed by the sustainability considerations throughout. Where alternative options for policies were identified which could result in likely significant effects, these options sets were screened into the Sustainability Appraisal process to inform decisions about preferred options.

3.2.1. Identifying options for policies and considering sustainability impacts

3.25 For each of the preferred policy approaches set out in the Regulation 18 document, the Council has identified a number of options for the approach which could be taken in the Local Plan 2042. These options are presented as tables of options sets and recorded within the relevant supporting background papers that accompany the consultation.

3.26 Once the options sets had been developed, the Council has then considered the implications of each policy option, including:

- potential positive consequences that taking it forward would secure for the city,
- negative or neutral consequences of each approach, such as where these would conflict with local priorities or that could cause other challenges.

3.27 As part of weighing up the different options that could be taken during this 'optioneering' process, the Council has sought to ensure that choices about each preferred approach have been considered with regard to its sustainability implications at a high-level, with reference to the 12 SA objectives as a framework to guide officers' thinking. This has helped to ensure that sustainability considerations have been intrinsic to the process of identifying a preferred approach. A summary of these high-level screenings

undertaken for each option set is presented in the relevant background papers alongside the tables of options sets themselves.

3.28 This high-level sustainability screening has helped to identify where particular options and alternatives for a policy approach have likely significant effects against any of the SA objectives. Where potential for significant sustainability impacts were identified, it was determined that these options sets should be 'scoped in' for Sustainability Appraisal with a full assessment of their potential impacts against the 12 SA objectives, which is documented later in this report.

3.29 Table 3.4 identifies which policies have been scoped in for sustainability appraisal (coloured blue and flagged in column three). The table also sets out which background paper records the high-level screening conclusions for each of the options sets considered for the Local Plan 2042 Regulation 18 consultation.

Table 3.4: Results of high-level SA screening of policy options sets including options sets that have been 'screened in' for detailed appraisal

Local Plan 2042 policy option set title	**Applicable background paper where options set is presented**	**Detailed appraisal needed?**
001a: Housing requirement for the plan period	001 Housing need, requirement and mix	Yes
001b: Mix of housing sizes (no. bedrooms)	001 Housing need, requirement and mix	No
001c: Loss of dwellings	001 Housing need, requirement and mix	No
002a: Affordable housing – Overall requirement	002 Affordable housing	No
002b: Affordable housing: financial contributions for new student accommodation…	002 Affordable housing	No
002c: Affordable housing: financial contributions from self-contained older-persons accommodation	002 Affordable housing	No
002d: Affordable housing: financial contributions from commercial development	002 Affordable housing	No
002e: Employer-linked affordable housing	002 Affordable housing	Yes
003a: House of Multiple Occupation (HMOs)	003 Specialist housing including student accommodation, self-build, older persons	Yes
003b: Location of new student accommodation	003 Specialist housing including student accommodation, self-build, older persons	Yes
003c: Ensuring there is enough student accommodation to meet needs	003 Specialist housing including student accommodation, self-build, older persons	No
003d: Homes for travelling communities	003 Specialist housing including student accommodation, self-build, older persons	No
003e: Homes for boat dwellers	003 Specialist housing including student accommodation, self-build, older persons	No
003f: Elderly persons' accommodation and other specialist housing needs	003 Specialist housing including student accommodation, self-build, older persons	No

003g: Self-build and custom house building options	003 Specialist housing including student accommodation, self-build, older persons	No
003h: Community-led housing	003 Specialist housing including student accommodation, self-build, older persons	No
003i: Boarding school accommodation	003 Specialist housing including student accommodation, self-build, older persons	No
004a-1: Employment strategy	004 Employment and inclusive economy	No
004a-2: Making Best Use of Existing Employment Sites	004 Employment and inclusive economy	No
004a-3: Allowing housing on existing employment sites	004 Employment and inclusive economy	No
004a-4: Location of new employment uses	004 Employment and inclusive economy	No
004b: Warehousing and storage uses	004 Employment and inclusive economy	No
004c: Community Employment and Procurement Plans	004 Employment and inclusive economy	No
004d: Affordable Workspaces	004 Employment and inclusive economy	No
004e-1: Short-stay accommodation (hotels and guest-houses) (New Accommodation)	004 Employment and inclusive economy	No
004e-2: Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)	004 Employment and inclusive economy	No
005a: Protection of GI network and green features	005 Green Infrastructure and biodiversity	No
005b: Provision of new GI features	005 Green Infrastructure and biodiversity	No
005c: Provision of new GI features – Urban Greening Factor	005 Green Infrastructure and biodiversity	No
005d: Delivering mandatory net gains in biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005e: Protecting and enhancing onsite biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005f: Protecting Oxford's ecological network	005 Green Infrastructure and biodiversity	No
007a: Flood risk and Flood Risk Assessments (FRAs)	007 Flood risk, drainage and SuDS	No
007b: Sustainable Drainage Systems (SuDS)	007 Flood risk, drainage and SuDS	No
008a: Net zero buildings in operation	008 Carbon reduction and climate resilient design	No
008b: Embodied carbon	008 Carbon reduction and climate resilient design	No
008c: Retrofitting existing buildings including heritage assets	008 Carbon reduction and climate resilient design	Yes
008d: Resilient design and construction	008 Carbon reduction and climate resilient design	No
009a: Air Quality Assessments and standards	009 Natural resources	No
009b: Water resources and quality	009 Natural resources	No
009c: Soil quality	009 Natural resources	No
009d: Contaminated land	009 Natural resources	No
009e: Amenity and environmental health impacts of development options	009 Natural resources	No
010a: Healthy Design/Health Impact Assessments (HIAs)	010 Health and wellbeing	No

010b: Privacy, daylight and sunlight	010 Health and wellbeing	No
010c: Internal space standards for residential developments	010 Health and wellbeing	No
010d: Outdoor amenity space	010 Health and wellbeing	No
010e: Accessible and adaptable homes	010 Health and wellbeing	No
011a: Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011b: Non-Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011c: Archaeology	011 Urban design, placemaking, heritage and archaeology	No
011d: Principles of high-quality design of buildings	011 Urban design, placemaking, heritage and archaeology	No
011e: Efficient use of land	011 Urban design, placemaking, heritage and archaeology	No
011f: View Cones and High Buildings	011 Urban design, placemaking, heritage and archaeology	No
011g: Bin and Bike Stores and external servicing features	011 Urban design, placemaking, heritage and archaeology	No
012a: Transport assessments, travel plans and servicing and delivery plans	012 Transport	No
012b: Bicycle parking design standards	012 Transport	No
012c: Motorcycle and Powered Two Wheelers Parking Design Standards	012 Transport	No
012d: Motor vehicle parking design standards	012 Transport	Yes
012e: Electric Vehicle Charging	012 Transport	No
013a: Focusing town centre uses in existing centres	013 Livable city - including retail	No
013b: Maintaining vibrant centres	013 Livable city - including retail	No
013c: Protection and alteration of existing local community facilities	013 Livable city - including retail	No
013d: Provision of new local community facilities	013 Livable city - including retail	No
013e: Protection and alteration of learning and non-residential institutions	013 Livable city - including retail	No
013f: Provision of new learning and non-residential institutions	013 Livable city - including retail	No
013g: Protecting cultural, social and visitor attractions	013 Livable city - including retail	No
013h: Provision of new cultural, social and visitor attractions	013 Livable city - including retail	No
014a: Infrastructure considerations in new development	014 Infrastructure	No
014b: Digital Infrastructure	014 Infrastructure	No

3.2.2. Targeted Sustainability Appraisal for scoped in policy options sets

3.30 As set out in Table 3.4 in the previous section, a limited number of policy options sets for Local Plan 2042 have been taken forward for further testing in this Sustainability Appraisal because it has been determined that the options (or some of the options considered) were likely to result in significant effects against one or more of the SA objectives. Scoping them in for a full sustainability appraisal has allowed the Council to more fully explore each option's potential for impacts against the 12 SA objectives which has then been factored into the decision about the preferred approach. The list of the 'scoped in' options sets is as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

3.31 The following tables set out the results of the detailed Sustainability Appraisal testing undertaken for these scoped in policy options sets, more detailed versions of the tables with additional commentary that explains rationale for scoring are included in Appendix A. Options considered for each policy set are set out in columns and scored against each of the twelve SA objectives which form the SA framework using the same scoring methodology used elsewhere in this report. Some concluding remarks are set out at the end of each table highlighting the main findings in terms of sustainability impacts and sometimes identifying where there may need to be additional mitigation put forward to avoid negative impacts.

<u>Policy Options set 001a: Housing requirement for the plan period</u>

3.32 Policy options that were considered, as discussed in detail in Background Paper 001, are as follows:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.8,800 dwellings over the Plan period 2022-2042).

- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

3.33 There is some overlap in testing of this option set with the testing undertaken for the growth strategy alternatives as set out in Section 3.1, particularly where they related to having a focus on housing. Whilst that appraisal has helped inform this testing as there are considerations that overlap, this option set specifically considers different approaches to setting the housing requirement in the Local Plan and the impacts that could arise, thus the appraisal does differ.

Table 3.5: Appraisal of options set 001a

SA Objective	Option A	Option B	Option C
1. Carbon emissions	--	-	--
2. Resilience to climate change	--	0	--
3. Efficient use of land	?	?	?
4. Local housing needs	++	+	++
5. Inequalities	?	?	?
6. Services and facilities	?	?	?
7. Green infrastructure, leisure and recreation	-	0	-
8. Traffic and associated air pollution	-?	+/-	-?
9. Water	--	+/-	--
10. Biodiversity	-?	0	-?
11. Good urban design / the historic environment	--	0	--
12. Economic growth	+/++	+	++

Policy Options set 002e: Employer-linked affordable housing

3.34 Policy options that were considered, as discussed in detail in Background Paper 002, are as follows:

- **Option a**: On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b**: Do not include an employer linked housing policy.

Table 3.6: Appraisal of options set 002e

SA Objective	Option A	Option B
1. Carbon emissions	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**
3. Efficient use of land	**+**	**0**
4. Local housing needs	**++**	**0**
5. Inequalities	**+**	**0**
6. Services and facilities	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**0**
9. Water	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**
11. Good urban design / the historic environment	**N/A**	**N/A**
12. Economic growth	**++**	**0**

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

3.35 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b**: Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c**: Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.

- **Option d**: Do not have any restriction on HMOs.

3.36 Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option a, c or d.

Table 3.7: Appraisal of options set 003a

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**+**	**+**	**+**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**-**
5. Inequalities	**0**	**+?**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**N/A**	**N/A**	**N/A**	**N/A**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**+/-?**	**-?**	**-**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

Policy Options set 003b: Location of new student accommodation

3.37 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.

- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

3.38 The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use which was considered to be the area where there could be significant effects that needed to be investigated further.

Table 3.8: Appraisal of options set 003b

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**0**	**0**	**0**	**?**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**+/-**
5. Inequalities	**N/A**	**N/A**	**N/A**	**N/A**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**+**	**-**	**+**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**?**	**+**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

Policy Options set 008c: Retrofitting existing buildings including heritage assets

3.39 Policy options that were considered, as discussed in detail in Background Paper 008, are as follows:

- **Option a**: Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d**: Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

3.40 For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

Table 3.9: Appraisal of options set 008c

SA Objective	Option A	Option B/C	Option D
1. Carbon emissions	**+**	**+**	**0**
2. Resilience to climate change	**+**	**+**	**0**
3. Efficient use of land	**N/A**	**N/A**	**N/A**
4. Local housing needs	**N/A**	**N/A**	**N/A**
5. Inequalities	**+**	**+**	**0**

6. Services and facilities	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**+**	**0**
9. Water	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**-?**	**0**
12. Economic growth	**N/A**	**N/A**	**N/A**

Policy Options set 012d: Motor vehicle parking design standard

3.41 Policy options that were considered, as discussed in detail in Background Paper 012, are as follows:

- **Option a**: Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b**: Adopt parking standards for residential developments
- **Option c**: Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d**: Adopt parking standards for non-residential developments

Table 3.10: Appraisal of options set 012d

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**+**	**-**	**+**	**+/-?**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**-**	**+**	**+/-?**
4. Local housing needs	**+/-**	**0**	**0**	**0**
5. Inequalities	**-?**	**0**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**

7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**-**	**+**	**+/-?**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**+**	**+/-?**
12. Economic growth	**0**	**0**	**+/-?**	**0**

3.2.3. Identifying a preferred option for policies and reasons for rejecting other options

3.42 In most cases, the Regulation 18 consultation document sets out the preferred approach that has been put forward for each policy proposed for the Local Plan 2042. The relevant background papers (as highlighted in Table 3.5 earlier) set out in their concluding sections why the preferred approach has been taken forward for the various policies where applicable and why alternative options were not taken forward.

3.43 The Sustainability Appraisal has tested the potential options that the Council has considered for a selection of the policies where it was deemed that the options (or some of them) could have likely significant effects against one or more of the 12 SA objectives and the results of this testing were set out in the tables of the previous section. This testing has helped to identify which options perform most positively against the sustainability objectives, but has also indicated where the Local Plan may need to incorporate mitigations to avoid negative impacts. There is no obligation to take forward the option with the most positive (or fewest negative) sustainability impacts—there may also be additional important considerations that need to inform the preferred approach—however, these findings help to more fully understand the potential for significant impacts arising from particular options and thus form an important factor in determining the preferred approach.

3.44 A summary of the reasoning for the preferred approaches to these scoped in options sets, particularly where this includes additional considerations beyond performance against the sustainability objectives, is included in Table 3.11.

Table 3.11: Preferred options taken forward for policy options sets subjected to Sustainability Appraisal in this report and the rationale for this

Policy option set	Preferred option	Rationale – including other considerations beyond sustainability (if applicable)
Housing requirement for the plan period (Option set 001a - proposed policy H1)	**Option B**	The preferred approach is to base the housing requirement on the housing capacity to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would mean that pressure would be placed on other policies aiming to meet the Plan' strategy. The option was better performing in the balance of positive and negative impacts against the sustainability objectives than the other options. Whilst it is acknowledged that the other options could have greater positive impacts in relation to delivering housing and economic growth, they also come at greater cost in terms of significant negative impacts against other sustainability objectives. Nevertheless, some mitigation will likely be needed to address negative impacts against SA criteria 1 (carbon emissions), 8 (traffic/air pollution) and 9 (water). *See conclusions section of Background Paper 001 for more detail*.
Employer-linked affordable housing (Option set 002e – proposed policy H6)	**Option A**	This option will allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority). The list of specified sites reflects willing landowners and sites that would otherwise not be available for residential uses, if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels. The option also had a greater number of positive impacts against the sustainability objectives than the other option tested. *See conclusions section of Background Paper 002 for more detail*.
Houses in Multiple Occupation (HMOs) (Option set 003a – draft policy H9)	**Option A**	This option will provide an opportunity for HMOs to come forward to meet needs in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the

		potential impacts on amenity of this type of housing. It was also generally the better performing option in terms of impacts against the SA objectives according to SA testing, compared with its alternatives (options C and D). Option B might potentially have additional positive impacts, but this is an additional element that could be combined with the other options and addresses requirements for purpose-built HMOs. It is not part of the preferred approach because of its potential impacts in competing with delivering housing that meets greater needs (such as social rented housing). *See conclusions section of Background Paper 003 for more detail.*
Location of new student accommodation (Option set 003b – draft policy H10)	Combination of **options A, E and F**	The preferred approach recognises that there may be additional sites, beyond existing campus/student accommodation sites, which are particularly suited to this type of accommodation, potentially more so than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for. It also includes a proposed approach for managing impacts from students. Options A, B, C and D were explored further through detailed testing in the SA. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. *See conclusions section of Background Paper 003 for more detail.*
Retrofitting existing buildings including heritage assets (Option set 008c - proposed policy R3)	Combination of **options A and B**	The preferred approach establishes clear support for retro-fitting projects that help deliver benefits in relation to mitigating/adapting to climate change. It provides additional support to applicants in relation to designing proposals impacting sensitive traditional buildings/heritage assets. The combination of these options secures greater positive impacts against the SA objectives, though potential negative impact against SA obj 11 should be mitigated through wording of policy to ensure clear requirements for applications impacting historic/traditional buildings. *See conclusions section of Background Paper 008 for more detail.*

Motor vehicle parking design standards (Option set 012d – proposed policy C8)	Combination of **options A, B and C**	This is the preferred approach as it pushes for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport, but accepts that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability. In terms of effects against the SA objectives, the options have varying impact. Seeking low car where possible which will help to maximise positive sustainability impacts, but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward. *See conclusions section of Background Paper 012 for more detail.*

3.3. Developing Local Plan site allocations

3.45 This section discusses the process undertaken for developing site allocations for the Local Plan 2042.

3.46 The Regulation 18 consultation document in Chapter 8 sets out proposed Areas of Focus and specific site allocations that would be included in the full draft Local Plan at Regulation 19 stage. Site allocations are policies specific to a particular site in the city and would set out the types of land use, or mix of uses, which would be acceptable on a specific site, or protects the site for certain types of development. Areas of focus are broader areas where changes are anticipated over the Plan period resulting from new development and these will each have their own policy including some key development principles specific to that area, as well as containing a number of site-specific allocations.

3.47 Whilst the Regulation 18 consultation does not set out the specific policies for sites or Areas of Focus because work is still ongoing on preparing them, the intention is that the Regulation 19 consultation will set out full draft policies for these areas.

3.3.1. Identifying potential development sites in the city

3.48 In relation to developing housing allocations—the long-standing need for housing means that the Council seeks to pursue a 'no stone left unturned' approach when identifying land that might be suitable for accommodating future housing in the city. Potential residential or mixed-use development sites for allocation through the Oxford Local Plan 2042 have been identified from a range of sources, which have then fed into the SHLAA, including:

- Previously allocated sites in the Oxford Local Plan 2036 and any additional sites that were being considered in the Oxford Local Plan 2040
- Further sites submitted to the Oxford Local Plan 2040 Examination
- Sites in historic planning policy documents such as the West End AAP and Sites and Housing Plan
- Call for sites inviting landowners and others to nominate sites
- Employment sites
- Green spaces (filtered out for further investigation if they are part of the identified core infrastructure network)
- Commitments (sites with planning permission or Prior Approval for housing)
- Sites refused planning permission or with an extant permission which are potentially suitable for development
- Desk-based map survey.

3.49 In relation to employment allocations—the Council has also been reviewing employment land needs and assessing sites across the city as part of its Employment Land Needs Assessment (ELNA) workstream. This has helped to identify sites that should be allocated for employment development, as well as to update the Council's understanding of existing employment uses that should be protected through employment-related policies.

3.50 Using these two workstreams, a large initial pool of potential sites for development has been identified, including housing sites and employment sites as well as some mixed-use sites.

3.3.2. Testing and refining site allocation for the Local Plan 2042

3.51 Many of the sites initially identified from the various sources informing the SHLAA and ELNA workstreams are, however, not ultimately suitable for allocation in the Local Plan 2042 for various reasons. For example, the presence of intrinsic environmental constraints such as national ecological designations (e.g. the SAC and SSSIs), or undeveloped land within the flood plain (flood zone 3b) may make development ultimately unsuitable, equally, some sites may be too small to warrant a specific allocation in the Local Plan. Additionally, to be put forward for allocation, the sites need to be considered in terms of deliverability, including whether a landowner has shown intent or willingness to bring forward a site for development. The list of initial sites are therefore subject to different types of assessment and refinement through the SHLAA and ELNA processes in order to identify those that the Council considers reasonable and deliverable.

3.52 As with previous Local Plans undertaken for Oxford, the Sustainability Appraisal process has been integrated into this site assessment/refinement process. This allows officers to streamline the procedure such that a single assessment can be carried out for each of the potential sites whilst also ensuring that sustainability considerations are intrinsic to developing site allocations. All sites that pass through the initial refinement as part of the SHLAA/ELNA workstreams and are identified as still having potential for allocation are subject to appraisal using the SA framework and its site-specific criteria as was outlined in Section 5.2 of the Sustainability Appraisal Part One report. Incorporating the work of the SHLAA and ELNA, alongside that of the Sustainability Appraisal, demonstrates that potential site allocations for the Local Plan 2042 have gone through a multi-stage process, as outlined in Table 3.12.

Table 3.12: The multi-stage process of site assessment informing potential allocations for the Local Plan 2042

Stage 1a: **Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. Undertaken as part of the SHLAA*.**
First stage of assessment undertaken through the SHLAA considered conflicts with national policy or insurmountable environmental/physical constraints. Sites were then taken forward for further consideration as allocations for development at Stage 1a unless they were: • A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI); • Greenfield in flood zone 3b; • Less than 0.25 hectares in area OR site does not have capacity to deliver 10+ net gain dwellings**; • Already at an advanced stage in the planning process (i.e. development has commenced). *Although it should be noted that in some instances sites are still taken forward for further consideration even if one of the above applies.*
Stage 1b: Assessment against additional deliverability considerations. Undertaken as part of the SHLAA*.
All sites that had passed the Stage 1a assessment are considered at Stage 1b in terms of deliverability as part of the SHLAA process. Sites were then taken forward for further consideration as allocations for development unless: • They were extremely unlikely to become available during the plan period; • The landowner had indicated they have no intention to develop; • There was serious conflict with the National Planning Policy Framework/Oxford Local Plan Preferred Options strategy and no mitigation was possible.
Stage 2: Assessment against the SA/SEA objectives.
All sites that had passed the Stage 1a/1b assessment process were then considered against the SA/SEA objectives. Sites were scored accordingly based upon any identified positive/negative impacts against the twelve Sustainability Appraisal framework criteria.
** The Strategic Housing Land Availability Assessment (SHLAA) can be referenced for further details.*

*** Sites can still come forward during the Local Plan period as windfall development without the need for allocation.*

3.53 The first stages (1a and 1b) of filtering in the above Table are carried out across the SHLAA and ELA workstreams, and this results in a proportion of sites being assessed as not suitable for allocation in the Local Plan. The sites that passed Stage 1 of the assessment process can be shown to be deliverable at a high-level (as they do not have insurmountable barriers to allocation) and have then been subject to Sustainability Appraisal as part of stage 2. For sites that have passed onto Stage 2, an individual Site Assessment form has been completed, which documents the Sustainability Appraisal findings alongside the results from the assessment at Stage 1a and 1b for completeness, and these can be referenced here—insert hyperlink to site forms once live.

3.54 The site sustainability appraisal process helps to identify potential sustainability impacts that could arise from taking forward a particular allocation based on an initial desktop review of each site's context. The scoring undertaken documents where development on a potential site can positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

3.55 As the site allocations policies have not yet been drafted, some scoring in the SA appraisals published as part of the Regulation 18 consultation are pending further information and will need to be revisited as the Regulation 19 draft Local Plan is prepared.

3.3.3. Next steps for Local Plan 2042 site allocations

3.56 Following the Regulation 18 consultation, the Council will prepare and publish its submission draft Regulation 19 Local Plan which will include full site allocation policies. As part of this process:

- Feedback from the Regulation 18 consultation will be considered.
- Additional work will be carried out to better understand the capacity of sites, including more detailed urban design assessment which will help inform the specifics of the allocation policies.
- Site assessment forms will be reviewed and sustainability appraisals updated where additional information is available for the proposed site allocations.

- Considerations around any mitigation that the Sustainability Appraisal of the sites indicates are needed will also be factored into the drafting of the site allocation policy if appropriate.
- The Regulation 19 Sustainability Appraisal report will compile and report back on this process.

4. Interim whole plan appraisal (Regulation 18 consultation preferred approaches)

4.1 Section 3 presented appraisals of different elements of the emerging Local Plan as presented for the summer 2025 Regulation 18 consultation. This included appraisals of overarching growth strategy alternatives, as well as a selection of the option sets for particular thematic policy areas which were identified as having potential to result in significant effects against one or more of the 12 SA objectives depending on which option was taken forward. The preferred options for the Local Plan in relation to these elements were also discussed, including:

- Pursuing a balanced approach to development for the Local Plan growth strategy with a primary focus on housing (option 1a as per Tables 3.1 and 3.2).
- Following the particular options for the thematic policies screened into the SA appraisal as set out in Table 3.11 at the end of sub-section 3.2.
- Additionally, preferred options have been put forward for other policy areas in the Local Plan, the process for coming to these draft policies is set out within the relevant background papers as were documented in Table 3.4.

4.2 The Regulation 18 consultation sets out a picture of the emerging Local Plan 2042 and the Council's preferred approaches but there are also areas where detail will continue to be refined and developed up to the Regulation 19 submission draft Local Plan, including specific requirements and thresholds within certain policies as well as full site allocations policies.

4.3 Nevertheless, to conclude the Part 2 report, a high-level interim whole plan appraisal is now presented (Table 4.1) which helps to better understand the impacts of the Local Plan in its entirety and begin to identify where particular mitigations are needed to address potential negative effects. This will need to be revisited more comprehensively, including scoring of impacts against the SA objectives, as part of the Regulation 19 consultation and once the full detail of the Local Plan and its allocations are available.

Table 4.1: Interim whole plan appraisal based upon preferred approaches set out in the Regulation 18 first draft Local Plan

SA Objective	Interim appraisal commentary
1. Carbon emissions	• The preferred growth strategy option (as with the alternatives) is likely to have a negative impact for carbon emissions due to the additional growth it supports. There will therefore be a need for mitigation to help avoid these effects and support meeting local and national net zero carbon targets. • The Reg 18 document includes policies aimed at delivering net zero carbon buildings in operation, reducing embodied carbon impacts and supporting retro-fitting. These proposed policies will help to ensure new development goes further than national standards in delivering highly efficient buildings that have a reduced impact on emissions and the wider environment. • It is likely that some level of emissions will continue in relation to upfront carbon/embodied carbon associated with the construction process and lifetime of the building, however the plan proposes policy to begin to secure reductions in this and form a stepping stone to stronger policy in future as guidance/understanding improves. Also, retro-fit policy cannot force occupants to retro-fit existing policy, in this regard the Local Plan has limited influence but can help to enable and support projects where they come forward. • The retro-fit policy options (option set 008c) were scoped in to be tested through the SA to better understand impacts of different policy approaches against the SA criteria, particularly in relation to impacts on carbon emissions but also the wider historic environment. The testing identifies that having a policy on retro-fit offers opportunities for positive impacts against this objective and others like 2. resilience to climate change and 8. Air pollution. It also flags that having policy supporting retro-fit on historic buildings could have negative impacts for 9. urban design/heritage, (though this depends on implementation and the draft policy does guide applicants to follow a Whole Building Approach in order to reduce this risk).
2. Resilience to climate change	• The preferred growth strategy option would be the most beneficial for maintaining and driving additional resilience to climate change, helping to ensure space for development is balanced with space for resilience features like greening and SUDs as part of development sites. It also seeks to protect a network of green infrastructure which has benefits for flood storage, slowing run off and cooling. • Resilience to climate change is likely to be an ongoing issue as climate continues to change throughout the Local Plan period. The Local Plan can play an important role in ensuring resilience is a key consideration in the design process, helping to avoid development that introduces additional risks (e.g. maladaptation). It can also help to introduce additional features that can improve resilience of existing areas (such as allowing sensitive redevelopment of existing poorly adapted sites within flood zones rather than allowing them to stagnate – as is part of the preferred approach to the Local Plan's flood risk policy).

	• Preferred approaches set out in chapter 4 to drive additional greening and biodiversity features, whilst protecting existing features including land within floodplain can help to secure flood storage and slow surface water run off, but also deliver cooling and areas of reprieve during intense heat. • Chapter 5's draft policies for energy efficiency linked with net zero can improve fabric performance of buildings helping to keep heat out in summer as much as keeping it in during winter. The proposed water quality policy would help to ensure new development includes measures that conserve water and mitigate impacts on water supplies (as discussed further below).
3. Efficient use of land	• The space-constrained nature of the city means that efficient use of land remains a key issue for the Local Plan. The preferred growth strategy option is the most efficient in terms of maximising available land for housing in order to meet the significant need for housing whilst also seeking to meet the range of other Local Plan objectives. The approach is brownfield first and seeks to protect a network of green infrastructure, but acknowledges that some green spaces could reasonably be developed to help contribute to growth needs. • The preferred growth strategy option permeates throughout the preferred options put forward in the Regulation 18 consultation. The housing requirement seeks to meet as much identified need as possible across available housing sites in a sustainable way. The strategy for employment includes an allowance for an element of housing to come forward on employment sites, and for some less-performing employment sites to be redeveloped for housing. Additionally, a specific draft policy is put forward that seeks to encourage the most efficient use of land, setting out various considerations that should guide applicants towards achieving the most appropriate densities to make best use of available sites.
4. Local housing needs	• The preferred growth strategy option provides a positive impact for contributing to housing needs though some level of unmet need is likely due to constraints on land in the city. It seeks to maximise capacity across sites in the city whilst also balancing other Local Plan objectives. • The different policy options being considered by the Council in relation to setting the Local Plan housing requirement were appraised through the SA because of the potential for significant effects against some SA objectives. The appraisal testing reflects the balanced overarching growth strategy, securing positive impacts for housing whilst limiting significant negative impacts against environmental sustainability objectives. • The quantitative housing requirement figure is one consideration in meeting housing need. Other considerations include meeting the needs for different types and sizes of homes, and affordability. There are a range of additional policies not tested through the SA appraisal which are proposed for the Local Plan 2042 to help deliver upon needs for particular groups such as affordable housing, elderly persons' housing and a mix of housing sizes to meet needs of different sized households. The effect of these policies may have some impact on capacities of sites and amounts of overall housing that come forward, but this will depend upon

	implementation and particular context of each site. Nevertheless, they are important for addressing varying housing needs across Oxford's communities. • Identifying the capacity across the city is an iterative process, and further work is ongoing to refine the assessment of capacity. In particular, more detailed site assessment work in ongoing, and that will inform site allocations and refine the capacity assumptions for those sites, for the Regulation 19 Local Plan. This work will be subject to further SA to inform the submission draft Local Plan.
5. Inequalities	• The impacts of the preferred growth strategy option were found to be uncertain and highly dependent on implementation for this objective (as for all the alternatives tested). The scoping work and background paper 010 (Health and Wellbeing) identify that Oxford is an unequal city, with significant variation in outcomes between different communities. It is likely that the preferred growth strategy will make some contribution to addressing elements of inequality, such as access to affordable housing or access to jobs, but this will depend on how development comes forward. • The Regulation 18 consultation includes draft policies that seek to guide development towards unlocking positive outcomes for inequalities wherever possible. Draft policy HD10 sets requirements for Health Impact Assessments (HIAs) to be undertaken for major development which should help to ensure the design process is tailored towards avoiding negative impacts on health (including exacerbating inequality) and maximising opportunities to create positive impacts. • In relation to housing, various draft policies in chapter 2 set requirements for meeting particular housing needs, like affordable housing, housing for particular groups, meanwhile, other design policies help to ensure the quality of housing is addressed (e.g. wheelchair accessibility, space standards, privacy and daylight). The Regulation 18 consultation also puts forward draft policies that seek to respond to economic inequality in the city as is discussed in greater detail against objective 12 below. • The preparation of the Local Plan is also being supported by a separate Health Impact Assessment, of which a scoping report has been published as part of the summer 2025 consultation. This identifies in greater detail the key issues for health and wider inequality that the Local Plan will need to respond to and identifies key policy areas that can help address particular issues. The intention is for the HIA to continue to inform the subsequent Regulation 19 Local Plan.
6. Services and facilities	• The preferred growth strategy option was appraised as having some positive and some negative impacts for services and facilities. More housing on brownfield sites in the city can help to ensure more people live in areas that have good access to a range of services/facilities (equating to a positive impact), however, it was noted that this could bring additional pressure for existing services/facilities (equating to negative impact). • The Regulation 18 consultation includes various draft policies that would help to mitigate the potential negative noted above, particularly the policies in chapter 7. For example, draft policies that seek to define

	city/district/local centres (draft policy C1) and maintain these as vibrant areas (draft policy C2), which is important for maintaining the functions of these highly accessible locations for meeting various daily needs. There are also a range of other policies in the chapter which seek to protect a range of specific community, institutional, social and cultural facilities. • Alongside the emerging Local Plan, the Council is preparing updates to its Infrastructure Delivery Plan, which plays an important role in identifying the infrastructure needs to support growth across the plan period, including community infrastructure needs. This helps to identify specific needs and funding requirements which can be used to guide investment from a range of sources including developer contributions which can help mitigate impacts of new development. • Whilst the above can help mitigate impacts somewhat, there is an element of uncertainty about the Plan's impacts on this objective. Elements of the plan are still emerging, such as site allocations, which means the impact of developing sites (particularly larger sites) will need to be appraised at the next stage of plan preparation. There are other factors outside the Plan's influence too, for example, previous changes to the use class system (e.g. introduction of use class e) and national permitted development rights, make it harder for the planning system to control changes in some uses that can include services/facilities.
7. Green infrastructure, leisure and recreation	• The preferred growth strategy option provides for the most beneficial approach to protecting high-quality, multifunctional green infrastructure in the city, whilst also seeking to ensure new development comes forward in a way that allows additional greening onsite. It does allow some greenfield sites to be developed where they are not protected for particular benefits, recognising the significant lack of developable land. • Preferred approaches set out in the Regulation 18 consultation include policy which designates a hierarchy of green spaces with additional protection above national policy, recognising the variety of benefits they provide, many of which arise from their specific location (e.g. acting as flood storage within flood plain, or contributing to setting of heritage assets). The spaces are also important for supporting recreation either informally (e.g. parks) or more formally (such as playing pitches). Other elements of the policies seek to protect features like trees and watercourses. • The proposed Urban Greening Factor would seek to ensure that baseline levels of greening on sites are not lost to development whilst additional greening is secured on sites that fall below the targeted standard. Other elements of the draft policies seek to guide quality of greening coming forward, requirements for new open space, and requirements for maintenance/management. • Additional evidence is being prepared in relation to playing pitches which will help to refine the approach to addressing playing pitch needs as the Regulation 19 Local Plan is prepared. Additionally, the ongoing site allocations workstream will help to inform particular greening requirements on allocations, including site-specific needs.

8. Traffic and associated air pollution	• The preferred growth strategy was scored as having positive and negative impacts for this objective. Additional housing in the city could help to reduce in-commuting by providing additional housing for workers in the city, but equally, more housing could increase car ownership, depending on implementation. The impact of private vehicles on emissions is likely to continue to reduce in the long term due to various county transport measures (e.g. Low Emission Zone, electrification of bus fleet etc.), and national phasing out of fossil fuel vehicles, (though this trend is longer term). • The SA tested the impact of the options set for Motor vehicle parking design standards because the options (which included variations on local parking standards or low car parking standards for residential and/or non-residential development) were deemed to have potential variations in effect, on this objective and others. The preferred approach to the policy is a mixture of some options. It is recognised that whilst there are important drivers for pushing for low car wherever possible in the city, particularly around areas that are accessible by public transport, (and these would be more positive scoring under the SA testing), there are still some groups that rely on private vehicles (e.g. some workers and some with disabilities). The drafting of the policy seeks to mitigate negative impacts wherever possible through providing clear requirements as to where low car is expected in the first instance. • The Regulation 18 consultation draft includes various other draft policies which can help to mitigate negative effects of the preferred growth strategy. A specific Air Quality (draft policy R4) policy seeks to ensure new development considers and mitigates impacts on air quality specifically. Bicycle parking standards (draft policy C5) are helpful for reducing congestion and reliance on private vehicles by seeking to increase uptake of cycling by ensuring development makes space for people to store these. Equally, the district and local centres policy (draft policy C1) helps to ensure that people's daily needs are supported by locating these uses in easily accessible locations without needing to rely on private vehicles. Additionally, the draft net zero carbon buildings policy (draft policy R1) will help to reduce impact from fossil fuel heating systems in new buildings; whilst the amenity policy (draft policy R8) seeks to ensure impacts from dust and other construction practices are appropriately managed.
9. Water	• The preferred growth strategy will introduce additional demands for water as with any new housing, however, the balanced approach to development will allow for the best outcomes in terms of mitigating impacts on the sensitive water environment. This is important as Oxford is located in a water stressed region and has ongoing water quality challenges in its watercourses (due to pollution from a range of sources). • Draft policies proposed for the Local Plan include a new water quality policy which seeks to ensure that new development that does come forward uses water prudently and takes up opportunities to conserve and reuse water whilst mitigating impacts on the water environment through

	measures like SUDs and pollution control. This should help to mitigate impacts associated with growth. • In addition, requirements set out in draft policy G2 include that development adjacent to watercourses incorporates sufficient buffers and takes up opportunities to renaturalise embankments. Meanwhile, requirements for additional greening as outlined in chapter 4 will help to enhance natural surface cover and reduce urban run-off, which will help with reducing risks of overwhelming sewage systems during high rainfall events, and also help to filter out pollutants before runoff reaches watercourses. • Ongoing discussions between the City Council, the Environment Agency and Thames Water have helped to agree an upgrade scheme needed for the Oxford Wastewater Treatment Works, which processes wastewater from development in the city. This is expected to allow capacity for the development of new homes in and around Oxford and is an important solution for helping to mitigate water quality impacts from future growth. It will be important for the three bodies to continue to work together as the Local Plan develops to ensure the safeguarding of the water environment over the plan period.
10. Biodiversity	• The impact of the preferred growth strategy options was assessed as being neutral for biodiversity. The balanced approach to growth allows for protection of a network of green and blue spaces including designated sites and sites with informal benefit for biodiversity, including corridors that help species to move across the city. The approach also allows onsite capacity to be balanced with other objectives such as incorporating open space and greening which can support biodiversity. • The Regulation 18 consultation does include draft policies that seek to boost provision for biodiversity onsite, such as the draft policy G5's ecological enhancements requirements. Requirements for greening as touched upon in comments under SA objective 7 can also have beneficial impacts for supporting species in the city. • Biodiversity Net Gain will of course be required on all applicable applications regardless of the Local Plan, this should bring new habitat for supporting biodiversity, although it is unclear how much of this will be able to be delivered onsite in many of Oxford's constrained areas. Where this needs to be provided offsite, draft policy G4 seeks to steer this towards areas identified in the upcoming Local Nature Recovery Strategy (LNRS) in the first instance, and ideally within the city before other locations are considered. • The ongoing site allocations work will need to consider the biodiversity potential of any potential sites to be allocated at Regulation 19 stage. Biodiversity considerations form a part of the site assessment process and where potential conflicts occur, the potential for mitigation to address these impacts will need to be considered. Additionally, as the LNRS is finalised, considerations in relation to opportunity areas identified in that strategy may need to inform the Regulation 19 Local Plan approach.

11. Good urban design / the historic environment	• A prominent variable between the growth strategy alternatives appraised for the Local Plan is how factors such as driving high-quality design and preserving Oxford's most sensitive and special historic assets and townscape setting are balanced with securing higher quantums/densities of development across the city. • The preferred growth option seeks to avoid the most significant negative impacts against this SA objective which are likely under the alternatives appraised that drive for maximising development quantums/densities. Vice-versa, it delivers the most significant positive benefit in relation to high-quality design, on the assumption that this requires a balancing of various types of uses on sites—meeting growth needs whilst ensuring this is sustainable. • Policy options sets for HMOs and Student Accommodation were appraised through the Sustainability Appraisal with one factor being considered being the potential for certain options to have significant effects with regard to amenity and the character of local areas, which has some relevant to this SA objective. The preferred options taken forward are those that seek to balance meeting needs for these particular types of housing in the city whilst also seeking to avoid negative sustainability impacts from over-proliferation of these types of housing and the ensuing amenity impacts that can arise (e.g. noise, parking, loss of local character). • The Regulation 18 consultation also includes a suite of draft policies as part of chapter 6 which seek to guide applicants towards conserving and enhancing different elements of the historic environment (including nationally designated assets as well as local non-designated assets and archaeology). Alongside these heritage policies, there are a number of draft policies which promote high-quality design, as well as detailed design checklist which forms part of the appendix of the plan and guides applicants through various considerations that align with the 10 components of good design as set out in the National Design Guide. • As the Council prepares its Regulation 19 Local Plan, it is envisaged that detailed assessments will be undertaken to inform the site allocations. Part of this workstream will include urban design assessments that can help to ensure local contextual factors guide the requirements in the site allocations policies and that these policies can seek to provide as much design guidance as possible in relation to what should come forward on these sites.
12. Economic growth	• The preferred growth strategy option would bring positive impacts for the economy and support new homes in the city - helping to address a key barrier to economic growth. The strategy seeks to protect Oxford's most important, or "key" employment sites (including local and nationally important ones) and focuses new employment-generating uses (i.e., Use Classes E(g), B2 and B8) towards these sites through a process of modernisation and intensification. It supports the delivery of housing on non-designated employment sites, while allowing the loss of employment floorspace to other uses on key employment sites, providing certain conditions are met.

	• The strategic choice to focus on housing, coupled with the provisions to allow some loss of employment land over the plan period, could make it more challenging to provide for the city's identified employment need. On-going work on the plan's employment evidence base - the Employment Land Needs Assessment (ELNA) - and the site allocations will help to refine this further. Where risk is identified, detailed policy wording can help mitigate this. • However, as noted in the appraisal findings for the growth strategy alternatives testing, whilst the preferred option is likely to result in overall positives for economic growth, there are risks that the high-performing economy, including large rental incomes for particular types of employment (e.g. grade A offices and labs) could leave behind or push out smaller businesses. This effectively results in market failure to provide for micro businesses and SMEs which could have ramifications where these are pushed outside the city (e.g. more commuting, reduced economic diversity in city). As such, the Regulation 18 consultation proposes a draft policy aimed at securing affordable workspaces on some of the larger employment sites in the city. • Additionally, the Regulation 18 consultation proposes a range of other draft policies aimed at supporting different elements of the economy, such as policy E2 addressing warehousing and storage uses (an important element for some businesses in the city) and policy E5 tourism and short stay accommodation. Also, requirements for employment and procurement plans in draft policy E3 are aimed at securing additional benefits for local communities in terms of developing skills and providing training/experience, which can contribute opportunities to those who are struggling to find employment at present (also helping to address economic inequalities).

4.4 The interim whole plan appraisal set out above identifies that emerging elements of the Local Plan 2042, including the preferred growth strategy and individual policies, could have a range of impacts. It begins to highlight how needs for mitigation are being factored into proposed policies in order to address potential negative effects (such as in regard to carbon emissions or impacts on natural resources like water and air), as well as how opportunities are being taken to secure additional positives from development (e.g. additional greening, biodiversity enhancements and provisions to meet the needs of smaller businesses in the city).

4.5 The Regulation 19 Sustainability Appraisal will need to revisit this appraisal and update it in order to take into account the additional detail of the Local Plan 2042 which is not yet available, particularly in relation to site allocations as well as additional evidence being prepared to support the Local Plan. The updated appraisal will also be able to fully take into account the likely effects of the Local Plan as a whole and may potentially identify

other impacts that will necessitate measures that can help prevent, reduce and offset these where needed.

5. Conclusions and next steps

5.1 This Part 2 report, accompanying the Regulation 18 first draft Local Plan 2042 consultation, has presented the appraisal of options and alternatives for the emerging Local Plan. Together with the Part 1 report, which covered the Sustainability Appraisal scoping stages, these set out how the Council has carried out stage A and B of the Sustainability Appraisal process, as set out in Table 5.1.

Table 5.1 The Sustainability Appraisal (SA) process and expected stages of Local Plan 2042 preparation including tasks covered in this report.

Stages of the Sustainability Appraisal process	**Relevant consultation**
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: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft to agree scope (Feb-March 2025) **Complete** Updated version published as Interim SA Report Part 1 for Summer 2025 Reg 18 consultation **Current stage**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as Interim SA Report Part 2 for Summer 2025 Reg 18 consultation **Current stage**
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 SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Will be published as part of late autumn 2025 Reg 19 consultation, also including updated information related to earlier stages where necessary
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

** The Environment Agency, Historic England and Natural England.*

5.2 The Whole Plan appraisal as presented in Section 4 of this report begins to discuss at a high-level how elements of the emerging Local Plan seeks to mitigate adverse and maximise beneficial effects (Task B4 in Table 5.1), however, this will need to be developed further as the full submission draft Local Plan is prepared following the summer consultation. The Council will also need to set out the monitoring framework intended to monitor significant effects arising from implementing the new Local Plan.

5.3 Following the Regulation 18 consultation, the Council will prepare and publish its Regulation 19 submission draft Local Plan. The Regulation 19 consultation will be accompanied by a full Regulation 19 Sustainability Appraisal report which will:

- Report back on a summary of key feedback received at Regulation 18 and identify where any changes have been incorporated.
- Review the findings of Parts 1 and 2 of the Regulation 18 Sustainability Appraisal work and update any information where relevant.
- Revisit Tasks A1 to B3 in light of full draft proposals, as well as Task B4 of Table 5.1 - meaning appraising the full draft Local Plan, including proposed policies and site allocations, with consideration of: likely effects of the Local Plan as drafted, as well as any mitigation needed for adverse effects, or opportunities to maximise benefits.
- Propose measures to monitor significant effects of implementing the Local Plan 2042 (Task B5 of Table 5.1).

5.4 Comments on this Sustainability Appraisal report can be made as part of the Local Plan 2042 Regulation 18 consultation via INSERT HYPERLINKS AND DETAILS OF CONSULTATION RESPONSE DEADLINES ETC.

Appendix A – Detailed SA appraisal of policy options

Policy Options set 001a: Housing requirement for the plan period

Policy options considered:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.9,800 dwellings over the Plan period 2022-2042).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

SA objective	Option A	Option B	Option C	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	--	-	--	Carbon impacts likely to arise from all options without additional mitigation, though more housing in city may reduce in-commuting and reduce transport emissions.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	0 Takes into account constraints like flood risk, green space etc.	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	

	being, the economy and the environment.	more green spaces, areas of flood risk.		more green spaces, areas of flood risk.	
3.	To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	**?** Arguably most efficient approach as capacity approach would mean still seeking to max out the developable land on sites, but also providing for open space, green infrastructure etc to meet other objectives.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	Ultimately, depends upon implementation
4.	To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** The Government's Standard Method identifies housing need in the absence of other locally specific factors.	**+** Does depend upon implementation, likely does not meet housing need in full within the city, but attempts will be made to meet unmet need elsewhere. Will however still make a substantial contribution to housing need.	**++** Depends upon implementation, would likely bring forward more housing in the city to meet need, however trying to meet a global number this could come at expense of meeting other specific local needs (e.g. family dwellings,).	
5.	To reduce poverty, social exclusion, and health **inequalities**.	**?**	**?**	**?**	Depends upon implementation for all options. Depends where in the city the housing comes forward, also the tenure of the housing (e.g. how much is affordable etc). More housing isn't necessarily

				going to help inequality alone.
6. To provide accessible essential **services and facilities**.	**?**	**?**	**?**	Depends upon implementation, new housing should come alongside provision for facilities/services (e.g. developer contributions/CIL). However, nature of city means many small sites that limits opportunities to provide for new services/facilities, leading to cummulative impacts.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**-** More pressure on existing sites and potentially more loss of green sites.	**0** Wouldn't be delivering new GI, however potentially more space on sites to incorporate GI – however this is likely to be more about mitigation of impact.	**-** More pressure on existing sites and potentially more loss of green sites.	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**-?** More people in the city with some associated increase in cars. Though potentially more workers able to live closer to employment reducing in-commuting generated.	**+/-** Would help to reduce the imbalance between those working in Oxford but being forced to live further afield. More people accommodated in the city and likely some increase in cars	**-?** More people in the city and going beyond need to support growth. Though potentially more workers able to live closer to employment reducing in-commuting generated.	Complex topic to score due to varying factors that could impact traffic/emissions. Generally it is assumed emissions related to transport will reduce as private vehicles move away from fossil fuels

		(though to lesser degree than other options).		and air quality measures in the city continue to have positive effects.
9. To achieve **water** quality targets and manage water resources.	**--** More people means more demand for water and more pressure on wastewater.	**+/-** More people means more demand for water and more pressure on wastewater. Capacity approach, would include scope to incorporate buffers to streams and other mitigations etc.	**--** More people means more demand for water and more pressure on wastewater.	All options would put additional stress on the water environment.
10. To conserve and enhance Oxford's **biodiversity**.	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	**0** Does depend upon implementation – development would deliver net gain, but might not be within the city. But would allow protection of a network of green sites important for supporting biodiversity, and may enable developments to better mitigate impacts on biodiversity or to accommodate more biodiversity features.	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	Assume that net gain is requirement regardless of local policy.
11. To promote **good urban design** through the protection and enhancement of the	**--** Will depend on implementation to some degree, however, assuming a more	**0** Capacity is based on taking into account considerations like impact on heritage. More	**--** Will depend on implementation to some degree, however, assuming a more	

historic environment and heritage assets while respecting local character and context and promoting innovation.	minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	scope to incorporate other features to support good urban design.	minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**+/++** Will make some contribution to economic growth by adding to housing and reducing barrier to employment in city, though some employment sites could be lost to housing.	**+** Will make some contribution to economic growth by adding to housing.	**++** Aims to provide enough homes for high economic growth, however, some employment sites could be lost to housing	

<u>Conclusions/potential mitigation needed</u>

Options A and C have some significant benefits for supporting housing and the economy but also come at the cost of more significant negative impacts against various other objectives. Option B would have positive impacts for housing and economy as it would still make an important contribution to housing need, though to a lesser degree than the other options, but it also incurs much less in the way of negative impacts for other objectives because of the capacity-based approach that drives it. Depending on the option selected, mitigation will be necessary in relation to carbon emissions, water and potentially traffic/air pollution (though this is less certain as impacts are hard to judge). Were options a or c to be selected, additional mitigation would need to be considered for a range of other areas including in relation to design/heritage, biodiversity, green infrastructure and climate resilience.

Policy Options set 002e: Employer-linked affordable housing

Policy options considered:

- **Option a:** On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b:** Do not include an employer linked housing policy.

SA objective	Option A	Option B	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**N/A**	**N/A**	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**N/A**	**N/A**	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**+** Potentially may lead to more efficiently using sites, or parts of sites, that would otherwise not come forward.	**0**	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** Would bring forward housing on sites that would not otherwise come forward, though this may not be available to everyone, it would still meet an identified need.	**0**	

5. To reduce poverty, social exclusion, and health **inequalities**.	**+** The sites would not otherwise be providing any housing. Whilst the affordable housing that would come forward might not be social rented housing, it would still be affordable rent set at a level agreed with the Council.	**0**	
6. To provide accessible essential **services and facilities**.	N/A	N/A	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Depends upon implementation (e.g. who the units are offered to), but is likely to support this criteria (e.g. reducing car travel – and some people would be housed on site).	**0**	
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	
11. To promote **good urban design** through the protection and	N/A	N/A	

enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.			
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**++** Part of the purpose of the policy is to support recruitment and retention of employees for key employment sectors.	**0**	

Conclusions/potential mitigation needed

Option a has greater positive sustainability impacts than option b. The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

Policy options considered:

- **Option a:** Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b:** Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c:** Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.

- **Option d:** Do not have any restriction on HMOs.

Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option A, C or D.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	Potentially, option b and d could encourage more HMOs which would be denser development – potentially better for emissions – same energy source? Very indirect.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	+	+	+	+	New HMOs or converting existing homes would be positive for efficient use of land. HMOs are generally a very

					space-efficient way to house people.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**+/-** This option could meet certain communities' needs but these would be competing with others.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**-** In some areas it wouldn't make a difference, but in other areas there is likely to be a signficant amount coming forward in others at the expense of meeting other local housing needs.	Anecdotally, there appears to be some demand for this type of accommodation, but it is not measured explicitly. All options could meet certain community's needs, but it would compete with other types of housing need.
5. To reduce poverty, social exclusion, and health **inequalities**.	**0**	**+?** Purpose-built HMOs can provide a better quality of environment for residents and neighbours – planning can influence the 'healthiness' that is designed into the development.	**0**	**0**	Some of the health impacts are controlled by a separate regulatory regime (selective licensing). Planning can control the design elements.
6. To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on

					existing services. Cumulative impact as they are not contributing to provision.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on existing green infrastructure/spaces. Cumulative impact as they are not contributing to provision.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	N/A	N/A	N/A	N/A	
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	
11. To promote **good urban design** through the	**0** The use of a threshold would	**+/-?** Uncertain, could result in more	**-?** Very much depends upon	**-** Depends upon implementation but	Scoring against this criterion considers the potential

protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	prevent an overconcentration of HMOs in any one area, limiting the negative impacts to amenity/local character etc.	HMOs coming forward with associated negative impacts on local amenity, though depends upon implementation, however, new build gives the opportunity to tailor the design to mitigate impacts.	implementation. This option could lead to some neighbourhoods becoming inappropriately dominated – although the policy can control which areas – losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	likely more negative. This option could lead to any of the neighbourhoods becoming inappropriately dominated, losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	harmful urban design impacts that can arise from HMOs such as bins, bicycles, car parking etc.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.					

Conclusions/potential mitigation needed

Option A and C both perform better in sustainability impacts than option D, though there is some additional uncertainty with elements of option C compared with A, which could result in additional negative impact under obj 11. Option B does

potentially have additional positive impacts in regard to obj 5, but this is an additional option (rather than an alternative approach that can be directly compared with the other options). The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003b: Location of new student accommodation

Policy options considered:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use, which was considered to be the area where there could be significant effects that needed to be investigated further.

SA objective	Option A	Option B	Option C	Option D	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	

2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**0**	**0**	**0** Would depend upon implementation. Would apply to campus sites or not – might encourage more efficient use of campuses.	**?** Potentially encourages more efficient use of institutional land and university-owned sites where space on the campus would be forced to be maximised – which might not otherwise be the case.	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-** Potentially meets more of the student housing need but this would be balanced out against not meeting/losing housing provision	**+/-** Potentially meets more of the student housing need (and slightly more than option a) but this would be balanced out against not meeting/losing housing provision	**+/-** Potentially allows more student accommodation to come forward and meet needs, but would likely be competing with meeting other housing needs	**+/-** Potentially means not meeting full student housing need but would ensure other housing needs outside campus sites is not lost to student accommodation.	Essentially it is a balance between opening up more sites to meet specialist housing need (students) and restricting it to preserve accommodation for wider housing need.

	for other housing need.	for other housing need.	which might not be met as a result.		
5. To reduce poverty, social exclusion, and health **inequalities**.	N/A	N/A	N/A	N/A	
6. To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student accommodation sites)	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student accommodation sites)	**-** Potentially means student accommodation in inaccessible sites e.g. edge of city. Potentially forces reliance on private vehicles.	**+** Depends upon implementation, some locations will be more accessible to public transport/active travel than others.	
9. To achieve **water** quality targets and	N/A	N/A	N/A	N/A	

manage water resources.					
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**+** Limits new accommodation to the areas that can arguably most-easily accommodate without additional harm to amenity.	**-** The addition of arterial routes allows the risk of long stretches of student accommodation to develop, negatively impacting amenity of the area.	**?** Depends upon implementation – could result in negative impacts as not preventing over-concentration.	**+** Generally, more positive, ensuring that student accommodation is located on the main university campuses, although potentially some negative impact where some student accommodation is outside the campuses.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	N/A	N/A	N/A	N/A	

Conclusions/potential mitigation needed

Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts.

Policy Options set 008c: Retrofitting existing buildings including heritage assets

Policy options considered:

- **Option a:** Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d:** Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

SA objective	Option A	Option B/C	Option D	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+** Would support energy efficiency/carbon reduction measures in existing non-heritage buildings	**+** Would support energy efficiency/carbon reduction measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for energy efficiency/carbon reduction retro-fit.	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**+** Would support climate resilience measures in existing non-heritage buildings	**+** Would support climate resilience measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for climate resilience retro-fit.	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**N/A**	**N/A**	**N/A**	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**N/A**	**N/A**	**N/A**	
5. To reduce poverty, social exclusion, and health **inequalities**.	**+** Helps to make existing homes more liveable and	**+** Helps to make existing homes that are also	**0**	

	(over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.	older buildings more liveable and (over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.		
6. To provide accessible essential **services and facilities**.	**N/A**	**N/A**	**N/A**	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**N/A**	**N/A**	**N/A**	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers to electric systems this will have some limited positive impacts in helping to reduce this source of pollution.	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers to electric systems this will have some limited positive impacts in helping to reduce this source of pollution.	**0**	

9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**0** Some retrofit measures (e.g. solar panels, small wind turbines) have the potential to change the character of a neighbourhood, although this impact is likely to be insignificant outside conservation areas etc.	**-?** Some retrofit measures are incompatible with heritage assets, listed buildings etc. The impact would depend on the specific implementation of the principles/requirements in the policy.	**0**	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	N/A	N/A	N/A	

Conclusions/potential mitigation needed

Option A and B/C both have positive impacts against a number of criteria. Option B/C may have negative impacts in terms of urban design/historic environment, though this depends on how retro-fit schemes are implemented. Mitigation for this impact could be achieved through a robust set of principles/guidance as part of the policy or in supporting guidance.

Policy Options set 012d: Motor vehicle parking design standard

Policy options considered:

- **Option a:** Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b:** Adopt parking standards for residential developments
- **Option c:** Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d:** Adopt parking standards for non-residential developments

For this appraisal, options b and d which refer to parking standards, assumes the Council would apply County standards. This means that for residential, there will be more parking provision per household (e.g. one space per dwelling) than the low car option. For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision – so it will depend upon implementation.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and transport emissions). Parking standards would result in more car

					parking for resi, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants will need to give proper and adequate consideration as to where the car parking should be located in the most efficient way. Parking standards

					will result in more land being used for car parking which is inefficient, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-?** Low car may provide more space for housing, however the space may be used for other uses. Equally, low car could impact viability of some schemes and ability to deliver affordable housing although the evidence for this is complex and uncertain.	0	0	0	
5. To reduce poverty, social exclusion, and health **inequalities**.	**-?** Even though low car would allow some spaces for	0	0	0	

		operational needs (e.g. those who need a car for work), it might not provide enough spaces. Typically, many such jobs that rely on a car are low paid, so could negatively impact this group. However, does depend upon implementation of each scheme (and who is occupying).				
6.	To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7.	To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
8.	To reduce **traffic and associated air pollution** by improving travel	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and

choice, shortening journeys and reducing the need to travel by car/ lorry.					transport emissions/congestion). Parking standards would be county standards, which would result in more car parking for resi, but for non-resi, impact is less certain, as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
11. To promote **good urban design** through	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants will need

the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.					to give proper and adequate consideration as to where the car parking should be located in the most efficient way (including making space for active/sustainable transport measures) which should benefit urban design. Parking standards will result in more land being used for car parking which is inefficient, though again, impact for non-resi is less certain depending on if car free is delivered or not.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy	**0**	**0**	**+/-?** Low car may provide more space for employment uses, however the space may be used for other uses. Equally, low car could impact viability of some schemes including new	**0**	

and the culture/leisure/ visitor sector.			developments although the evidence for this is complex and uncertain. It will also depend upon implementation and the specifics of the site.		

Conclusions/potential mitigation needed

Options A and C are score most positively against the SA objectives. Option B has negative impacts against some of the criteria, potentially allowing additional cars than the low car options which could have some congestion impacts and emissions, though in relation to emissions these are likely to reduce in the long term as transport decarbonises. Option D is uncertain because it allows applicants to justify car requirements which may result in additional vehicles (or may result in fewer vehicles where car free development is delivered), it depends on implementation.

Background paper 001

Title: Housing Need, Requirement and mix

This paper addresses... *overall housing need*
SA Objective(s): 4. To **meet local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
SEA theme(s): Material assets and population.

1. Introduction 2
2. Policy Framework/Plans, Policies, Programmes 3
National Planning Policy Framework (NPPF) 3
National Planning Practice Guidance (PPG) 4
Regional and Local Context 4
Oxfordshire Housing and Growth Deal 4
Neighbouring Local Plans 5
Oxford Local Plan 2036 6
Housing and Economic Land Availability Assessment 7
Oxford City Council “Our Strategy” 2024-2028 7
3. Current situation 7
Housing Need 7
Housing Requirement 7
4. Likely trends without a new Local Plan 8
Housing Supply 8
Housing Completions 8
5. Options for Local Plan 2042 Policies 9
Policy options set 001a (draft Policy H1): Housing requirement 10
Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms) 13
Policy options set 001c (draft policy H8): Loss of dwellings 16
6. Conclusions including preferred approaches for Local Plan 2042 18
Key sustainability issues for the Local Plan to address: 18
Preferred approaches for the Local Plan 2042 19

Housing Requirement – Draft policy H1 19
Mix of housing sizes – Draft policy H6 19
Development involving Loss of dwellings – Draft policy H8 20

1. Introduction

1.1 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. Oxford is an international city and important part of the knowledge economy, with a world-renowned university and hospitals. In addition, the mix of housing sizes also needs to be considered, as some will need smaller (1-bed) units and others larger homes to accommodate a large family. How to manage particular housing types such as Houses in Multiple Occupation (HMOs) is also important. This paper focuses on overall housing need and mix. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily. Meeting the needs of those in high housing need, or those who may struggle to afford to remain in the city, is also important to meet social objectives such as overcoming inequalities and improving health and wellbeing. Affordable Housing is considered in Background Paper 002. Particular groups have particular housing needs, including students, those who need extra care, gypsy, traveller and boaters. Specialist housing need is considered in Background Paper 003.

1.2 This topic paper begins with a review of the national, regional and local policy context relating to housing need and requirement. It then goes on to look at the current situation in Oxford and includes a discussion on housing need and Oxford's housing target. The "current situation" section then moves on to discuss housing supply. The next section talks about the likely future without a new local plan, and discusses housing supply and the competing pressures for limited land available in the city. Finally, some key sustainability and plan issues are drawn out the paper.

1.3 Historically Oxford has been unable to meet its calculated housing need. The last round of Local Plan's in Oxfordshire aimed to meet the needs assessed in the 2014 Oxfordshire Housing Market Assessment, updated for Oxford in 2018. Oxford's total capacity for housing was less than its calculated need. So unmet need was taken by the other districts' local plans (full details are set out within this paper).

1.4 Oxford's capacity for housing is estimated in the Housing and Employment Land Availability Assessment 2023, and this shows that Oxford's total capacity for housing was less than its calculated need. Further capacity work will be undertaken for Oxford this year, to identify its current capacity.

1.5 It is important that a range of market and affordable housing types are available to meet a wide range of needs. Evidence will be required to demonstrate what these housing types are, which will then help shape a policy on housing mix which takes into account an assessment of the need, market demand, design considerations, viability and housing register. These issues will also need to be addressed at the planning application stage of any proposed new development, which will have an impact on the overall housing mix coming forward.

2. Policy Framework/Plans, Policies, Programmes

National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance. The NPPF also considers that the needs of groups with specific housing requirements are addressed. Paragraph 63 provides an indication of those groups which includes, older persons, students and gypsies and travellers. Paragraph 69 sets out that a housing figure for the whole local authority area should be included by strategic policy making authorities and Paragraphs 72-77 provide the national policy position on identifying land for homes. Paragraphs 78-81 discuss how strategic policy making authorities should maintain the supply and delivery of new homes.

2.2 The National Planning Policy Framework (NPPF) (2024) requires local planning authorities to plan for a mix of homes based on current and future demographic trends, market trends and the needs of different groups in the community. The size, type, tenure and range of homes needs to reflect local needs to ensure that mixed and balanced communities are supported. The housing need across Oxford is high and as such all types and sizes of dwellings are required. However, some sites and the area context will lend itself to certain mixes of dwellings. The city centre and district centres are most likely to be suitable for higher density developments and it is expected that dwelling densities would continue to be higher than those in neighbouring districts reflecting Oxford's urban area.

National Planning Practice Guidance (PPG)

2.3 The National Planning Practice Guidance (PPG) includes additional guidance on the following housing topics relevant to housing need and supply:

- Housing and economic land availability assessment;
- Housing and economic needs assessment;
- Housing needs of different groups;
- Housing needs for older and disabled people;
- Housing supply and delivery.

2.4 The PPG re-iterates the expectation for strategic policy-making authorities to follow the standard method for calculating housing need (Paragraph: 002 Reference ID: 2a-002-20241212). This explains that the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. This is intended as an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this assessment does not produce the housing requirement figure.

2.5 The PPG goes on to explain the housing requirement (040 Reference ID: 2a-040-20241212). The PPG says that, once the need is calculated using the standard method, the planning authority should make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

2.6 The PPG also provides advice about assessing land availability within the boundaries of a plan-making authority including setting out the purpose of this assessment. Paragraph 001 Reference ID: 3-001- 20190722 of the PPG sets out that "An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period." In relation to whether or not a site should be allocated, the PPG sets out that the role of the land availability assessment is to provide information on the range of sites which are available to meet the local authority's requirements but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

Regional and Local Context

Oxfordshire Housing and Growth Deal

2.7 The Oxfordshire Housing and Growth Deal supports the delivery of 100,000 homes in Oxfordshire between 2011 and 2031 and secured £215million of funding including £60million for affordable housing and £150milllion for infrastructure improvements including for road and rail. As part of this deal, there was a commitment to produce a county-wide strategic plan. For this reason, work began on the Oxfordshire Plan 2050, which was to provide high-level strategy to inform the districts' local plan, including on housing need and

the housing requirement for each district. However, work on this plan was eventually aborted by the constituent authorities.

Neighbouring Local Plans

2.8 In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of housing need identified in the 2014 Strategic Housing Market Assessment (SHMA) due to the constrained nature of Oxford. Oxford's need was assessed as a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). The approach taken by the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) was that the mid-point of this range should be taken as the starting point for assessing the level of need and unmet need (i.e. 28,000). Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. The assumed capacity for Oxford was 10,000 dwellings.

2.9 In the last round of Local Plans, the other Oxfordshire districts agreed to deliver 14,300 dwellings, which met the majority of unmet need arising from Oxford's Local Plan 2036. These were apportioned as follows:

Table 2.1

Cherwell Local Plan	4,400
South Oxfordshire	4,950
Vale of White Horse	2,200
West Oxfordshire Local Plan	2,750

2.10 Originally, the intention for the next round of local plans was that housing need and requirements would be informed by the Oxfordshire Plan 2050. The Oxfordshire Growth Needs Assessment was undertaken, agreed and published, and initial work on the Oxfordshire Plan 2050 consulted on. This had not yet got to the point of developing a strategy to use to apportion the need between the districts. Further work to update the OGNA was commissioned, but agreement on this work could not be reached, and work on the Oxfordshire Plan ceased. Work had commenced on the Oxford Local Plan 2040, and to enable this to continue, Oxford, with Cherwell, commissioned a Housing and Economic Needs Assessment to inform the housing need of those two authorities. The Oxford Local Plan 2040 was submitted for examination on this basis, but the Inspectors concluded that the duty to cooperate had not been met because the HENA looked at the whole of Oxfordshire in order to establish the housing need of the two authorities.

2.11 Work has continued on local plans in each Oxfordshire district. Before the base-dates of these plans, unmet need for Oxford had not come forward. Negotiations and joint working have been on-going to ensure strategic sites deliver for Oxford's unmet need, including by

ensuring there are nomination rights for the affordable housing, so it meets the needs of those on Oxford's housing list. The following table shows the amount of Oxford's unmet need incorporated into the draft plans of our neighbouring districts (latest position as at January 2025).

Table 2.2

District	Plan and Stage	Total housing for Oxford's unmet need proposing to add to requirement	Years requirement to be applied to
Cherwell District Council	Cherwell Local Plan Review 2042 Regulation 19 consultation taken place	4,400	2020-2042
Vale of White Horse District Council	South and Vale Joint Local Plan 2041- submitted	1,830	2021-2031
South Oxfordshire District Council	South and Vale Joint Local Plan 2041- submitted	4,950	2021-2035
West Oxfordshire District Council	Local Plan 2031 and Salt Cross AAP (examination re-opened to look at zero-carbon policy, following legal challenge).	2,750	To 2031

Oxford Local Plan 2036

2.12 The Oxford Local Plan 2036 contains a number of policies relating to housing need and supply. In particular Policy H1 sets the housing requirement for the plan period. The housing requirement for the plan period from 2016-2036 is 10,884 homes, which is a stepped trajectory to reflect the anticipated delivery of housing over the plan period. The housing requirement in the Oxford Local Plan 2036 is as follows:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

2.13 Policy H4 sets the mix of dwelling sizes. This applies only to affordable housing. For market housing, an explanation of the proposed housing mix is required. There are exceptions to

the policy requirement for affordable housing, for example in the city and district centres, where density may be high and only smaller units are suitable.

Housing and Economic Land Availability Assessment

2.14 This is a constraint-based assessment that seeks to identify sites and broad locations and assesses their development potential. The assessment looks at whether sites and broad locations for development have the potential to come forward as part of the development plan process. (i.e., are sites or broad locations for development available and achievable?) The most recent one carried out for Oxford was to support the Oxford Local Plan 2040 and was completed in September 2023, with an addendum completed in March 2024. This showed the capacity of Oxford to be 9,851 for the period 2020-2040, which is an average of 493 dwellings per annum. This will be updated to support the Oxford Local Plan 2042.

Oxford City Council "Our Strategy" 2024-2028

2.15 One of the five main priorities of the City Council's strategy to 2024 is to deliver 'good, affordable homes'. The strategy recognises that 'To address Oxford's housing issues we must drive up standards for existing housing alongside a focus on providing new homes, working in partnership across the housing sector.'

3. Current situation

Housing Need

3.1 In national planning policy, an area's housing need is different from the housing requirement. The NPPF December 2024 makes it clear that the assessment of housing need should be generated using the Government's Standard Method. The standard method is used to identify an annual housing need figure. The standard method housing need calculation for Oxford City calculated in December 2024 is 1,087 dwellings per year.

Housing Requirement

3.2 The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method. It also recognises that there may be unmet need, if the housing need is greater than the number of homes that can realistically be delivered within the plan period within the planning authority's area. This is the case in Oxford as the housing need is significantly greater than the capacity of the city.

3.3 There are very significant constraints on the capacity of the city – physically with the city's tight administrative boundary and Green Belt, and environmentally with large areas of national and international biodiversity interests and areas within flood zone 3b functional flood zone as well as heritage and townscape considerations. Oxford's housing requirement is therefore a constrained and capacity-based target. The Inspector for the Oxford Local Plan 2036 acknowledged in his report that Oxford's housing requirement was only a proportion of the total number of homes that made up the total housing need.

3.4 The current housing requirement, as set in the adopted Local Plan 2036, is 10,884 homes for the period 2016-2036. Policy H1 provides a stepped trajectory to reflect changes in anticipated delivery over the plan period:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

3.5 Oxford's physical and environmental constraints on its capacity for growth are not new issues and through the joint working undertaken as part of the Growth Board, an element of Oxford's unmet need was apportioned to the surrounding Oxfordshire district councils to accommodate within their administrative areas as part of the Duty to Cooperate process. This led to strategic allocations for growth in plans for all of the Oxfordshire district authorities most recent Local Plans.

4. Likely trends without a new Local Plan

Housing Supply

4.1 Oxford's constrained capacity for housing land has traditionally meant that there is strong competition for land for housing, student accommodation, employment and other uses. In order to help address the supply of housing, the strategy for the Oxford Local Plan 2036 was housing-focused and prioritised delivery of homes. The strategy sought to allocate no new employment sites, instead prioritising the loss of certain low quality, poorly located employment sites (category 3 employment sites) for housing. Notwithstanding this approach, there is continued pressure on infrastructure as a large proportion of housing developments are on small-scale infill sites and offer limited opportunities to deliver new on-site strategic infrastructure. This has been exacerbated by changes to national policy in recent years which include permitted development for residential conversions from other uses including offices and shops. Such changes of use are not subject to the same planning considerations in relation to supporting infrastructure to support the new homes formed.

4.2 Work with the other Oxfordshire authorities has resulted in a number of strategic allocations being made in the plans of our neighbours to help meet housing need. Other actions by the City Council to deliver housing, such as setting up a housing company and setting affordable housing delivery as a corporate priority, will continue to push forward housing delivery.

Housing Completions

4.3 Since 2006, the majority of new homes have been delivered on small-scale, dispersed brownfield sites, either re-developing existing units or converting existing buildings. The city's last remaining strategic greenfield sites are Barton Park and Oxford North. For the last few years, annual delivery at Barton Park has made a significant contribution to housing delivery, and more recently housing has begun to be delivered at Oxford North.

4.4 Table 4.1 shows the net additional completions from 2016/17 (the base date of the 2016 Local Plan) which is taken from the 2023/24 Annual Monitoring Report published in December 2024. This takes into account dwellings gained and lost through new build completions, demolitions, changes of use and conversions and includes completions of purpose built student accommodation.

Table 4.1 - Showing net additional completions since 2016 (Oxford City Council 2024)

Year	Dwellings (net) completed (built)
2016/17	419
2017/18	367
2018/19	358
2019/20	790
2020/21	711
2021/22	581
2022/23	554
2023/24	365
TOTAL (since 2006/07)	**5,848**
TOTAL (since 2016/17)	**1,918**

4.5 In the 23/24 monitoring year there were 365 recorded completions which represents a decrease compared to recent years. This follows a decrease in 21/22 and 22/23 compared to 19/20 and 20/21. This is reflective of both the lack of new large strategic sites, and also wider economic circumstances, including uncertainties from Brexit and the global economic situation (affected by Covid, the Ukraine war and other globally significant effects), and the lack recently of large student accommodation schemes. Changed economic circumstances have also tipped the balance towards delivery of economic development, particularly research and development, rather than housing, which has resulted in fewer conversions from economic sites to housing.

4.6 Likely trends without the plan include continued residential completions from a variety of sources including from Oxford City Housing Limited.

5. Options for Local Plan 2042 Policies

5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 will need to take account of the need to provide new homes, of the right sizes. To ensure the situation is not made worse, the loss of dwellings should also be managed.

5.2 The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Housing requirement
- Housing mix
- Loss of dwellings,

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 001a (draft Policy H1): Housing requirement

5.5 The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need. It is important that the overall housing need is fully understood, in order to be able to plan to meet that need. The NPPF is clear that the housing requirement set in the local plan may be different to the housing need identified by the Standard Method. The strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

5.6 This means that there are not really options for calculating housing need. The housing need for Oxford calculated by the Standard Method introduced in December 2024 is currently 1,087. That means that the housing need over the 20-year plan period 2022-2042 is currently 21,740.

5.7 However, there are different potential options for the housing requirement set out in the Local Plan. The housing requirement is what it is expected will be delivered each year. The housing land supply will be calculated using this figure, and it will be used as the target for the Housing Delivery Test. The NPPF sets out that the requirement may be higher than the identified housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment.

Table 5.1 - Policy options set 001a: Housing requirement for the plan period

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).	The NPPF says that local plans should aim to meet identified need. Meeting housing need in full would help reduce social problems such as overcrowding and homelessness, as well as problems employers have attracting staff. It may help improve affordability. Meeting housing need within the city may help communities stay together.	It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 400dpa, which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable.
Option b Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial	The requirement would be deliverable within the city (this is the only option that achieves this). The principle has been tested at examination and found sound for LP2036, the Core Strategy, and the 2016 Local Plan before that.	It will need to be shown that need is being met elsewhere if provision is not made for the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement. If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.

strategy (c.9,800 dwellings over the Plan period 2022-2042).		
Option c Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.	The Standard Method need calculation is based on existing housing stock with an affordability uplift applied. It does not, therefore, necessarily take account of the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.	The HELAA evidence base indicates that this option would be undeliverable in Oxford over the plan period, thus there would be significant unmet need issues and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a or b or c **High-level screening conclusion? -**the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** These options are about the housing requirement that is determined should form the basis of the Local Plan. The housing requirement may differ from housing need, which is calculated using the Standard Method. The NPPF states the housing requirement may exceed the housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment. There are growth ambitions for Oxford, but there is also limited capacity. Reflecting these growth ambitions through an increased housing requirement would only lead to a greater level of unmet housing need, which could not be met in Oxford anyway. Setting the housing requirement at the level of the Standard Method need calculation would mean that many other aims and ambitions would need to be compromised, and it is likely would still be unachievable. The housing requirement may also be lower than the need in order to reflect those constraints on capacity (option b). In terms of sustainability impacts, the most relevant SA criteria are **criterion 4 local housing needs** and criterion **12, to achieve sustainable economic growth**. However, there is

potential for indirect impacts on a broad range of criteria, if the strategy is to attempt to meet housing needs, which would compromise other objectives. Delivery of housing is essential to meet local housing needs, and indicators suggest there are many negative impacts in Oxford form a severe lack of suitable, affordable homes. Housing is also necessary to sustainably support economic growth. There is, therefore, potential for significant impacts from these options and they should be taken forward for further appraisal.

Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms)

5.8 The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. There are a range of considerations in setting a mix, including that some sites and locations will be more suitable for different types of dwelling, and that needs may change over time. Ensuring a range of units sizes is available will be key to meeting a range of needs. The mix could be defined by number of bedrooms or bedspaces.

Table 5.2 - Policy options set 001b: Mix of dwelling sizes (no. bedrooms)

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a Set a policy mix to ensure a range of sizes of unit for affordable housing only (this would apply to all tenures except the market housing).	It is important that there is a housing mix where possible to meet a wide range of demand. The affordable housing mix will be informed by the housing register (a snapshot in time), existing housing stock, and acknowledgement that tenants' needs change over time and may need to downsize.	A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if there was no requirement for large units, or the local context may be more suited.
Exclude certain areas or types of development from any set mix where they would benefit from greater flexibility. For example exclude smaller sites	This ensures that where a mix is most suitable it will bring benefits of ensuring a range of units to meet a range of needs, but where it is not relevant or beneficial there is greater flexibility.	Depending on the exclusions, this may significantly reduce the number of sites where a set mix is required, which could affect the availability of a range of sizes over time.

where there is less opportunity to create a mix, avoid high density areas such as the district centres as they are suitable for small units to further increase density, do not apply to employer-linked housing as there will be specific needs linked to the staff.		
Option b Set a mix for both market and affordable homes and on a broad range of sites, for example including all those over 10 units.	This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.	This would not allow for a flexible response to the market, to changing needs in an area, or the context of a site. This more prescriptive policy approach would mean that sites at district centres and in the city centre would need to have a range of unit sizes, rather than just those that maximise density, so overall numbers may be reduced. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example.
Option c Do not specify a mix of unit sizes for any type of development but do require at least 2 or 3 types of unit size in all developments over, for	This would enable the mix to be tailored to the site context and the most up-to-date data, for example the current needs on the housing list. It would also ensure there is more than one unit type coming forward. More flexibility would allow more tailoring to the location.	This level of flexibility in the policy requirement could be met by a very limited range of unit sizes. It would be more likely to fail to meet identified needs and could lead to an imbalance in sizes of new units entering the market and available as affordable housing, both in the short term and the longer term.

example, 25 units.		
Option d Do not specify a mix but require the mix to respond to the Housing Register and therefore identified needs.	Such an approach could help ensure that what is being delivered is meeting immediate needs. It would provide an indicative mix which would also be informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.	Such an approach is dependent on reliable and up to date data. The housing list is only a snapshot in time (updated continuously). If for example there are several years with a need mainly for small units and only those are delivered, this will lead to a lack of variety, then in later years when needs may change and there will not be enough larger units to accommodate needs appropriately. This would not achieve mixed or balanced communities. It would not provide enough certainty for developers; a policy with a changing requirement may not be found sound.
Option e **Do not include a mix policy.**	Provides complete flexibility.	The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. It would be difficult to demonstrate that the Plan is providing for the needs of different groups in the community as per the NPPF. One-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various combinations (e.g. either a, c, d, e or a+b or a+c). **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** There is no specific national requirement for a policy although it is indirectly important to helping meet NPPF requirement and there is local context which supports the inclusion of some sort of locally prescribed approach although various constraints in Oxford lead to several potential options for how best to formulate a policy. Options a and c represent different levels of scope over which to apply a mix requirement (applying just to affordable

element or market provision too), meanwhile options d and e represent different ways to influence mix without having such a broad mix specification as is presented in options a and c. Option e is simply to not set a local policy in relation to housing mix and could be considered as another different option. Option b is more of an additional dimension to specifying a housing mix policy and could be incorporated alongside either option a or c.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, most directly, this would be **criterion 4. Local Housing Needs** because of how they influence the balance of dwelling sizes that could come forward and help to meet needs of different groups in the community**.** Indirectly, the options also have impacts that relate to **criterion 5. Inequalities**, with some of them influencing the mix within the affordable housing element which will help to cater for those who have more difficulty accessing affordable housing, as well as **criterion 3. Efficient Use of Land** (because mix can influence how many dwelling on a site) and **criterion 11. Urban design** (influencing housing mix can influence an applicant's ability to reflect local context).
Between the options, the level of sustainability impact is unlikely to vary significantly, with each of the option a, c, d or e likely having a minor positive impact for SA criteria 4. and 5. and minor negative for criteria 3. and 11. There is a potentially more positive and more negative impact in option c that addresses both market and affordable, with these impacts decreasing towards neutral across option a and then options d and c. Option e of not having a policy would likely be a neutral impact in terms of sustainability impacts. Overall, the extent of sustainability impacts is not considered to be significant for any of the criteria regardless of option and the relevant SA criteria that the impacts relate to themselves do not differ significantly between the options, so it is not considered necessary to scope in for detailed assessment.

Policy options set 001c (draft policy H8): Loss of dwellings

5.9 Given the scale of housing need in Oxford, it is important to ensure that the existing stock is protected otherwise the benefits of delivering new housing would be undermined. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from family homes or from the longer term private rented sector. There are a range of considerations in setting an approach however the lack of available land and sites can constrain development of other facilities needed to support the local community. Future legislation may help us to control changes of use to short term lets.

Table 5.3 - Policy options set 001c: Loss of dwellings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Resist a net loss of dwellings	Such specific reasons for an exception could include conversion to a nursery or primary care facility;	The loss of dwellings undermines the benefits of building a mix of new homes.

except for specific reasons.	therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.	
Option b Resist the subdivision of family homes.	Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.	Precludes the sub-division of the existing housing stock which in some instances would be a better or more efficient use of land in a particular location and provide more homes where the need is so great. The loss of family dwellings undermines the benefits of building a mix of new homes, which include homes suitable for families
Option c Have no restrictions on the loss of dwellings.	No restrictions means that housing stock can be changed as the market demand requires. There would be more flexibility to respond to the market. Overall numbers of homes could increase.	Losing control over the existing supply of housing stock would undermine the benefits of bringing forward housing in new development to meet the population's current and future needs (objectively assessed need).

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various options/combinations (option a, b, or c or a combination of options a and b). **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Options a seeks to prevent the loss of homes unless their loss would provide or bring improved benefit to the local community. Option b seeks to specifically prevent the subdivision of family homes to help ensure that the mix of homes available includes those suitable for families. Option c is to not set any restrictions at all via the Local Plan. Option a or b could be carried forward on their own or combined with each other. In terms of sustainability impacts, the different options all relate primarily to **criterion 4. Housing Need, criterion 6 Essential services and criterion 11 Urban design.** Options a

and b are likely to have more positive impacts against criterion 4. Option c could potentially place a greater demand on local services, having the potential to have a negative impact on criterion 6. Option c could also potentially lead to more of a negative impact against criterion 4 as the populations' current and future housing needs are not able to be met and also criterion 11 as the character of the neighbourhood could change as demand for local services could change. Overall, the sustainability impacts do not differ significantly between the options and it is not considered necessary for detailed appraisal.

6. Conclusions including preferred approaches for Local Plan 2042

6.1 In Oxford, the high cost of housing and limited availability of housing has a big social and economic impact. As of 2018/19, it was reported that **26% of children** in the city live in poverty, once housing costs have been taken into account. Availability of sufficient and affordable housing can help reduce poverty and is important to overcoming inequalities in the city. Availability of affordable housing is also important to employers, enabling them to attract and retain staff. Businesses may struggle if they cannot attract or retain staff, and other employers and services such as education, public transport and healthcare may struggle to run without sufficient staff, which would also have negative social and economic impacts.

Key sustainability issues for the Local Plan to address:

6.2 Local Housing Needs:

- Oxford has limited capacity to deliver new homes within its boundary and has often been unable to meet housing need in full without support from neighbouring authorities
- Implications of wider economic circumstances on housing delivery likely to see continued suppression of housing delivery.

6.3 Inequalities:

- The plan should address how the supply of new housing can meet the needs of particular demographics.

6.4 Urban Design:

- Housing, of various types, needs to be appropriately located, considering amenity of existing neighbours, and suitability for new proposed residents.

6.5 Essential Services:

- A continued reliance on smaller sites is likely to increase pressure on existing infrastructure

Preferred approaches for the Local Plan 2042

6.6 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address housing need, requirement and mix. Under each of the topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Housing Requirement – Draft policy H1

6.7 The preferred approach for the Local Plan 2042 is to have a local policy that sets the total housing requirement over the plan period, and annualised. The housing requirement could be based on the identified need, or could exceed it in order to support a greater level of economic growth. However, the preferred approach is to base the housing requirement on the housing capacity. This is to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would certainly mean that pressure would be placed on other policies aiming to meet the Plan' strategy, such as in relation to green infrastructure .

6.8 The options set was tested through the Sustainability Appraisal with Option B performing better in balancing positive and negative impacts. Option B scored positively for meeting housing needs and economic growth because it makes an important contribution to housing need and was more positively scoring compared with the other options in relation to objective 10 (biodiversity), 11 (heritage), 9 (water), 7 (adequate Green Infrastructure) and 2 (resilience to climate change). This is because the capacity-based target can take account of these other considerations. Whereas if the aim was to meet the need above the identified capacity, as in the case of Options A and C, whilst these options do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan.

6.9 This means **option B** is proposed as the preferred approach.

Mix of housing sizes – Draft policy H6

6.10 The preferred approach for the Local Plan 2042 to have a local policy that sets a mix of housing sizes in certain circumstances, but for many schemes requires the chosen mix to

be justified and explained, but does no se a specified mix. The proposed mix applies only to affordable housing, and excludes the types of schemes where the mix would be difficult to achieve, or conflict with other aims, such as in flats in the city centre or district centres where delivery of only one or wo bedroom units helps to achieve density aims and may be more fitting to the infill development often appropriate in these locations.

6.11 Whilst either of the four options, option A, B, C or D or various combinations of these could be taken forward, the preferred approach is a combination of **Options A and B** which ensures a mix of affordable home sizes to meet needs over the plan period, requires justification of the selected mix, and provides flexibility to respond to sie-specific needs and changing circumstances.

Development involving Loss of dwellings – Draft policy H8

6.12 The preferred approach for the Local Plan 2042 policy is to have a local policy that addresses the protection of existing housing stock. This will help to relieve pressure on the use of dwellings that are of a suitable size for families and assist with the management of demand for residential units to be subdivided or converted or be brought into use as short term lets.

6.13 This means either **option A or B**, or a combination of both option A and option B could be taken forward. Option A will help ensure that homes are not lost unless their loss would provide or bring improved benefit to the local community. Option B will help prevent the subdivision of homes and ensure that the mix of homes includes homes that are suitable for families.

Background paper 002

Title: Affordable Housing

This paper addresses: **This paper explains the key issues relating to affordable housing needs in Oxford, and the context to delivering affordable housing that reflects the local circumstances in Oxford (especially that they need to be truly affordable to Oxford residents).**
SA Objective(s): **4.To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home**
SEA theme(s): **Material assets, population, human health**

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

National Planning Policy Framework and Planning Practice Guidance 3

Housing and Planning Act 2016 3

Oxford City Council Corporate Strategy 2024-28 4

Oxford City Council Housing, homelessness and rough sleeping strategy 2023-2028 . 4

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 4

Oxford City Housing Register 5

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 6

5. Options for Local Plan 2042 policies 8

Policy options set 002a (draft policy H2): Affordable housing contributions 10

Policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation 12

Policy options set 002c (Draft Policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation 14

Policy options set 002d (Draft policy H5): Affordable housing: financial contributions from new commercial development 16

Policy options set 002e (Draft policy H6): Employer-linked affordable housing 19

6. Conclusions including preferred approaches for Local Plan 2042..... 21
6.1. Preferred approaches for the Local Plan 2042 22

1. Introduction

Affordability (or unaffordability) of housing for people living in Oxford is a key issue to address in LP2042, and is also a corporate priority of the City Council more broadly. It is an issue that goes back many years, as a result of the high land values and property prices in Oxford not being matched by salaries, resulting in many people being priced out of the market to buy or to rent homes in Oxford.

The problems cannot be solved by planning policies alone, but LP2042 can help to address it alongside other Council initiatives and programmes including the Affordable Housing Delivery Programme and the Council's housing company OX Place delivering affordable homes.

This paper explains the key issues relating to affordable housing needs in Oxford. It then explains how LP2042 could seek to address these needs with policies to deliver affordable housing that reflects the local circumstances in Oxford and that is truly affordable to Oxford residents.

This paper helps to explain the following housing-related topics:

- Delivering affordable homes (contributions from residential developments)
- Affordable housing contributions from new purpose-built student accommodation
- Affordable housing contributions from self-contained older persons accommodation
- Employer-linked affordable housing.

This paper focuses on the affordability of housing and factors affecting the delivery of affordable housing, whilst the supply and demand is covered in Housing Need Background Paper 003 (which also explains how affordability is factored into overall housing need in the Standard Method calculations) and Background Paper 004 covers specialist housing need.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (NPPF) sets out that Local Plans should deliver a sufficient number and range of homes to meet identified housing need, including affordable housing. It defines affordable housing in Annex 2 of the NPPF. The Planning Practice Guidance (PPG) sets out further clarification about how the NPPF should be applied, including how to calculate affordable housing need and supply.

Elements of national policy and guidance that are particularly relevant to delivering affordable housing in Oxford are:

- The threshold of 10 dwellings for seeking developer contributions towards affordable housing (thereby exempting developments of 1-9 dwellings from affordable housing requirements) (PPG paragraph 023).
- The Permitted Development Rights (General Permitted Development Order) for conversion of office to residential, which has a similar impact of effectively exempting those conversion developments from affordable housing contributions.

The former NPPF requirement to include First Homes in the affordable housing mix, has now been removed from the NPPF (explained in footnote 31 of NPPF). Instead, there is greater emphasis on delivering social rent (paragraphs 63 and 64 of the NPPF). These amendments to the NPPF are more closely aligned with the aspirations in Oxford for affordable housing that is truly affordable to those in Oxford in housing need.

Housing and Planning Act 2016

The Housing and Planning Act (2016) sets out measures intended to boost the supply of new housing nationally, to devolve significant new powers to a local level, and to support first time buyers to make home ownership more affordable. There was also various reforms to social housing, which do not directly impact the delivery of new affordable housing but do affect the supply of Social Rent housing available because of initiatives such as right to buy.

Oxford City Council Corporate Strategy 2024-28

The City Council Corporate Strategy 2024-28 identifies housing affordability as a key issue facing the city, both for local people and local employers. The Corporate Strategy identifies delivering good, affordable homes as one of the key priorities.

Oxford City Council Housing, homelessness and rough sleeping strategy 2023-2028

Oxford City Council's Housing, homelessness and rough sleeping strategy 2023-2028 sets out intentions to provide more affordable and low carbon homes, alongside wider intentions to improve conditions for those renting homes, and to prevent homelessness and rough sleeping. Providing more, affordable, homes is identified as a key priority, and actions to deliver this include OX Place delivering a build programme, working with housing associations to build new homes including Social Rent, and working with neighbouring councils to ensure that more affordable housing is built in and around Oxford.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Oxford is one of the least affordable cities, due to the mis-match between average house prices/rent levels and average salaries (the affordability ratio). This has been the situation for a number of years. The high cost of housing in Oxford, compared to wages, (known as housing affordability) has many impacts and consequences, and many people who work in Oxford cannot afford to live here.

In august 2024 the average house price in Oxford was £489,000. This is more than 12 times the average household earnings; this makes it one of the least affordable places in the country. This has consequences for the economy and key services, as employers struggle to attract and retain staff, including essential hospital staff, health and social care workers, teachers, as well as those in retail, hospitality, and office workers. There are also potential social impacts on families and communities who may be split up because of housing costs. Even when applying so-called affordable housing purchase products, such as shared ownership or First Homes, it is still unaffordable for many people in Oxford to own their own home.

As a consequence of high house prices, there is a large private rented sector in the city. However, rent levels are also very high, so renting a home via the private-rented sector is

also out of reach for many people. The average private rent in Oxford is £1,725 a month (September 2024). This can result in Oxford's workforce needing to share rented accommodation or needing to commute into the city in order to find suitable accommodation. It also means that Social Rent housing plays an important role in meeting affordable housing needs in Oxford.

Social Rented housing is the lowest cost compared to market values. Tenants rent from the City Council or a Housing Association, usually at about 40% of market cost (ie what a private landlord would charge for the same home). Thus as the lowest cost option it helps provide housing for those in greatest need. Unsurprisingly, there is a huge demand for this type of housing in the city, yet it is also the most expensive to build (due to the larger discounts on returns). There are also significant numbers of people who do not have sufficient priority on the housing register to be considered for Social Rent (when compared to households in even greater housing need), yet market housing is also out of reach. So it is also important that intermediate types of housing (such as shared ownership models) continue to be provided for as well.

Oxford City Housing Register

The Oxford City Council Housing Register records how many people have registered to apply for Social Rent housing in the city. There are currently (January 2025) just over 3,000 people on the housing register, and it is expected that only 5% of these will be housed within a year.

Regardless of the method used, Oxford is one of the most expensive places to buy or rent a property in comparison with monthly earnings, as a result of high land values, limited land availability, and a shortage of homes. This means that housing is so expensive - in absolute terms and compared to average salaries - that many people are priced out of the market and many people who work in the city are unable to afford to live here.

Affordable housing delivery

The City Council has been working to increase the delivery of affordable homes through a number of measures across council departments. Some affordable housing is delivered through planning permissions on qualifying sites, some is delivered directly by the City Council through the affordable homes programme, and some is delivered via the City Council's Housing Company OX Place. There are also various other complementary programmes and initiatives by the City Council to tackle homelessness and reduce empty homes.

Table to show affordable housing completions in Oxford 2016/17 to 2023/24, taken from Authority Monitoring Report 2023/24

Year	Affordable housing completed
2016/17	20
2017/18	17
2018/19	105
2019/20	104
2020/21	144
2021/22	274
2022/23	273
2023/24	61

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

One of the biggest issues facing residents in Oxford is the unaffordability of homes, to rent or to buy. Overall the affordability of housing in Oxford is likely to continue to be an issue in future, as the lack of land for housing (including for affordable housing) and increasing land values push house prices up further. Research suggests that social and affordable housing accommodation is likely to need to continue to play an important role for Fast Growth Cities (FGCs) such as Oxford and Cambridge, where overall increases in the housing stock are unlikely to fully address affordability issues alone.

The supply of affordable homes to meet need in Oxford is likely to remain a challenge, particularly Social Rent, but also market rates and discounted purchase options, such as shared ownership. Market rental prices are also likely to continue to increase as the unaffordability of buying homes puts additional pressure on the rental market. In turn this also affects the types of homes required, and there is already high demand for shared accommodation in the private rental sector as a lower cost option than renting or purchasing individual properties.

The supply of affordable housing is being challenged due to the compounding impact of: a general lack of land supply for new homes within Oxford, losses through Right to Buy, especially since the increased discount introduced in 2012; changes to national policy which reduce the opportunities for delivering new affordable homes through developer

contributions, for example the city is not allowed to secure affordable homes when new homes are delivered via office to residential prior approval B56 permissions, and even with an updated local plan this situation would not change; and caps on rental incomes for local authorities or registered providers which are set nationally.

Together these factors are likely to impact on the overall numbers of new affordable homes delivered, as well as the mix and balance of communities in Oxford during the Plan period.

If the affordability of housing worsens, then there would also be other knock-on effects because it affects not just where people can afford to live and quality of life, and also impacts the economy as employers in key sectors in Oxford already have problems recruiting and retaining staff. If economic growth is constrained, then this affects not just Oxford but the wider region and even national economy as Oxford is a net contributor nationally.

The City Council is committed to the delivery of affordable housing through several initiatives which are outside of the local plan and would happen anyway without the plan. The City Council has set up OX Place as a wholly owned company, which has an aim of delivering more affordable housing. The Council's Affordable Housing Delivery Programme also directly delivers new homes as well as taking on homes from developer contributions. But there also needs to be supply from other sources (through developer contributions and housing associations) so overall it would be more difficult to deliver affordable housing without an up-to-date local plan.

The City Council has also been working with the other Oxfordshire district councils to help deliver homes to address Oxford's unmet need outside the city boundary. Neighbouring Local Plans make provision for these additional homes, including delivery of affordable homes. The City Council has been working with its partners on the allocation policy and management of those new affordable homes in adjoining districts, in particular ensuring that those on Oxford's housing register will be eligible to apply for the new homes. However without an up-to-date local plan to establish the housing need and housing requirement then it is less certain that unmet need within adjoining districts would be delivered because it would be difficult for those authorities to deliver additional housing over and above their own requirements if it has not been tested by an Inspector.

Affordability is also influenced by government policies related to incentivising home ownership and house building including delivery of affordable housing, which would influence affordable housing delivery in Oxford with or without a plan.

Most of these initiatives focus on helping people to purchase homes, however the nature of the housing market in Oxford means that even with those support measures, purchase options are still out of reach for many people in Oxford and/or they are not workable or viable for developers. Recently the NPPF was updated and no longer requires First Homes to be included within the affordable element of proposals.

So overall these national initiatives in terms of affordable housing delivery, and especially Social Rent, may be fairly limited in terms of take-up and their effectiveness in addressing housing needs in Oxford because the high prices and unaffordability pressures simply do not fit with the national models. Which is why local policies are needed in the LP2042 which are bespoke to address the particular circumstances and housing needs in Oxford.

In recent years, external economic factors – including Brexit and the war in Ukraine – have also affected construction costs and availability of materials, as well as rises in the costs of borrowing. These have significantly affected viability of developments, as explained in more detail in the Viability Study. This affects how much value can be captured to deliver public goods, such as affordable housing, and also the supply of housing generally.

5. Options for Local Plan 2042 policies

The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 should include several policies to address the topic of delivering affordable housing. The Local Plan 2042 therefore includes proposes policies on the following topics:

- Affordable housing contributions from qualifying residential developments
- Affordable housing contributions from purpose-built student accommodation
- Affordable housing contributions from commercial / employment developments
- Employer-linked affordable housing

Linked to these policies, it is also important that the Plan includes an overall viability policy to ensure that none of the policies requiring affordable housing contributions would risk development becoming unviable. This is addressed in Chapter 1/background paper XX, which explains the cascade approach for sites if the full policy requirement for affordable housing contributions is not viable.

For each topic, the options that have been considered for the Local Plan 2042 policy, are presented. These ‘options sets’ are set out in tables on the following

pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken, and that have helped inform the preferred position set out.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has “screened in” the options set in for a more detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 002a (draft policy H2): Affordable housing contributions

Securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford. In successive Plans the City Council has adopted policies that require the delivery of an ambitious percentage of affordable housing. These contributions – whether onsite or financial – have made a significant contribution to the supply of affordable homes in Oxford.

With any policy about contributions towards affordable housing there are various policy decisions to reflect how to direct those contributions towards most effectively delivering homes to meet the needs of local people in the specific context of Oxford. For example whether to prioritise affordable housing to rent or to buy; whether to maximise the number of affordable homes or the greatest levels of subsidy of the homes (but fewer affordable homes as they cost more in contributions); or whether to prioritise developer contributions towards other public benefits.

Table XX: Policy options set 002a Affordable housing contributions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek to maximise the overall number of affordable homes delivered through contributions	This would help to maximise the number of affordable homes, and to meet a range of different affordable tenures including for those who are seeking affordable home ownership options. Encourages a mix of tenures onsite. More flexibility to respond to market demands to help site viability.	To be viable, this option is likely to mean a lower proportion of Social Rented homes, and a larger proportion of intermediate tenures of affordable housing such as shared ownership, so would not help as many people on the housing register. Options other than Social Rent are not affordable to many of those in need of affordable housing in Oxford because of the prices to wages ratio in Oxford.
Option b Focus on maximising the number of Social Rent homes from developer contributions, even if this means fewer affordable homes overall	This option would prioritise delivering affordable homes for those in the greatest housing need, that would not be able to afford alternative affordable housing tenures.	This is likely to result in the delivery of fewer affordable houses overall from contributions (because they cost more for developers to deliver), which could in turn worsen the level of affordable housing need if supply slows while demand continues.

		Option does not help meet the needs of households that could afford shared ownership/ low-cost home ownership models. It would also not encourage mixed communities to focus on just one tenure or form of affordable housing.
Option c Do not maximise affordable housing contributions but set them at a lower level of contribution that leaves more opportunity for alternative developer contributions or greater profit margins.	This would allow for developer contributions to be directed to delivering other infrastructure or public benefits. A greater profit may also encourage delivery of sites for residential uses and make the profit levels more competitive against other land uses which are currently more attractive to developers in terms of profit levels (mainly R&D uses in recent years).	This approach would fail to maximise opportunities to address the affordable housing crisis and inequalities, and it is not necessary in order to encourage sites to come forward because that would be tested through the preparation of the local plan.
Option d Do not include any policy requiring affordable housing contributions.	This would minimise risk of affordable housing contributions negatively impacting on viability of sites, and it would allow maximum contributions towards other infrastructure and public benefits.	This would not at all be attempting to meet affordable housing needs, which would be contrary to the NPPF, so would not be a sound approach. It would also do nothing to address the housing crisis in Oxford or reducing inequalities.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? A or b or c or d **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about how to prioritise developer contributions from residential development in order to deliver public benefit in the form of affordable housing, which is a local priority. Options a and b prioritise delivering affordable housing, whilst option c prioritises affordable housing to a lesser degree (alongside other contributions or greater profits for the developer) and option d would set no local steer on affordable housing contributions. Options a and c are about the overall affordable housing requirement, usually as a percentage of the development, whereas b is about which tenure split to prioritise within that requirement.

In terms of sustainability impacts, options a and b, would score positively against **criterion 4 local housing needs** by contributing to ensuring that everyone has the opportunity to live in a decent affordable home. Option c is also likely to contribute towards **criterion 4** plus other sustainability objectives such as **criterion 7. Green infrastructure** or accessibility/transport under **criterion 8** however these are likely to be minor positive impacts and would depend very much on implementation on a case-by-case basis what the contributions were targeted to. Option d would not help to meet **criterion 4**, nor would it be consistent with the NPPF which requires plans to making provision for housing including affordable housing (para 20). Similarly, by delivering affordable housing, options a, b, c would all score positively against **criterion 5 inequalities**, because access to affordable housing is a factor in reducing inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation

Many sites for student accommodation could equally be suitable for non-student homes, from which an affordable housing would normally be sought. The exception to this, is where student accommodation is developed within existing university campuses, because market housing would not usually be provided within those sites. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from new purpose-built student accommodation.

Table XX: Policy options set 002b Affordable housing: financial contributions from new student accommodation

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a Seek a financial contribution from all student accommodation developments, towards affordable housing	In many situations, affordable housing would not be suitable to be provided on student sites. Therefore, a financial contribution towards provision of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured separately. The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from	This would mean that the financial contributions from student accommodation are sought on a comparable basis to residential development. It	None identified.

student developments equivalent to 10 or more self-contained units [the same threshold as residential developments] or 25+ student rooms	would also maximise the level of contributions towards much-needed affordable housing.	
Option c Only require financial contributions from larger student schemes, for example of more than 50 rooms (or 20 self-contained units).	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings. This could encourage landowners to opt for student accommodation in unsuitable locations instead of residential homes and would not help to address the constrained supply of new homes in Oxford or to meet housing needs within Oxford.
Option d Require affordable housing to be delivered on-site within larger student developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.
Option e Do not require an affordable housing contribution from any student accommodation developments	None identified.	This would make the development of student accommodation disproportionately more viable and therefore attractive to developers, than the development of general housing which would result in sites suitable for housing being delivered for student accommodation instead. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c or d or e **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from student accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for student accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes or equivalent number of student rooms at a ratio of 2.5:1) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs. In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 002c (Draft Policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation

Many sites for self-contained older persons accommodation could equally be suitable for mainstream residential development, from which an affordable housing would normally be sought. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from those developments.

Table XX: Policy options set 002c: Affordable housing: financial contributions from self-contained older-persons accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek a financial contribution from all	In many situations, affordable housing would not be suitable to be provided on older persons sites. Therefore, a financial contribution towards provision	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured separately.

self-contained older persons accommodation developments, towards affordable housing	of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from developments equivalent to 10 or more self-contained units [the same threshold as residential developments]	This would mean that the financial contributions are sought on a comparable basis to residential development. It would also maximise the level of contributions towards much-needed affordable housing.	None identified.
Option c Only require financial contributions from larger development, for example of more than 20 self-contained units.	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings.
Option d Require affordable housing to be delivered on-site within larger older-persons developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, onsite provision of affordable housing within new developments for older persons such as retirement complexes, is unlikely to be appropriate because of the different housing needs and lifestyles. Management agreements and other restrictions (e.g. car parking) are also imposed which are also not necessarily appropriate to general housing.
Option e Do not require an affordable housing contribution from any older-persons	None identified.	This would make the development of older-persons accommodation disproportionately more viable and therefore attractive to developers. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing

accommodation developments		that would have been secured if the site was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from self-contained older-persons accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for older-persons accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs. In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 002d (Draft policy H5): Affordable housing: financial contributions from new commercial development

Commercial developments can impact on affordable housing needs by encouraging workers in housing need to move to Oxford to take up new jobs generated by the proposed use of the new development. As such this policy explores whether those developments should contribute towards affordable housing provision.

Table XX: Policy options set 002d Affordable housing: financial contributions from new commercial development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Commercial developments have the potential to generate demand for affordable housing. Option would support economic growth by helping to deliver affordable housing to support a local workforce. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of affordable housing. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.	Requiring financial contributions towards affordable housing could impact on viability of developments, especially in the period soon after adoption, because this is not currently a local policy requirement so schemes already in the pipeline may not have factored it into costs. This could however be mitigated with a viability cascade to ensure that the policy does not prevent sites being developed. Furthermore in recent years the viability of commercial developments has been very strong in Oxford, outstripping even residential developments. Option would also need to be tested via a viability assessment to check that this typology of site could deliver the policy requirements.
Option b Do not require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Financial contributions could be sought towards alternative public benefits eg public transport as part of travel to work to support sustainable commuting to the site.	Option would not help to deliver affordable housing at all, with knock on effects for employers trying to attract and retain staff.
Option c Require onsite provision of affordable housing as part of major commercial developments (over 1000sqm or 1ha)	Provision of affordable housing close onsite has the potential to reduce commuting and help address recruitment issues, although the residents would depend on implementation (the tenure and allocations policy) as to who could access the homes. Introducing residential to areas which are solely employment presently, could help to bring more	Onsite provision may not be feasible or practical on all sites depending on the size and location of the site, for example if the site adjoins land uses which are not compatible with residential, or if the site is located within a larger employment park which would otherwise be empty overnight and/or weekends it may not be a pleasant living environment, or on sensitive sites such as hospital sites where employers would only wish to house

	vibrancy to areas of Oxford which are otherwise only occupied for part of the day/week.	their own staff for security reasons. This would depend on implementation, and certain exclusions may be justifiable eg to exclude on-profit making sectors such as health and education. It could also impact on viability if the employment use cannot be maximised on the site, or could constrain the economic potential of the site. A cascade policy would be needed to ensure the policy does not prevent sites being developed, with an option to revert to equivalent off-site financial contributions if appropriate.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** These options are about whether to seek contributions towards affordable housing from commercial developments, and about whether the contribution should be via financial contributions or via onsite provision of homes. Commercial developments can generate demand for affordable housing, so these options therefore seek contributions towards addressing that. In terms of sustainability impacts, options a and c would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities.** Whereas option b would do nothing to help achieve either of these objectives. By helping to address affordable housing needs, options a and c would also support **criterion 12 economic growth** because affordable housing is often reported by employers as a key issue affecting recruitment and retention especially in essential sectors such as health care and schools, as long as there is a viability cascade to ensure the contribution does not prevent sites coming forwards. Option b would not help to address affordable housing needs but could mean more contributions could instead be used towards other public benefits eg public transport improvements to support employment and sustainable travel to work which would deliver alternative sustainability benefits. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal. Implementation may need exclusions for certain types of employment site eg hospitals and schools.

Policy options set 002e (Draft policy H6): Employer-linked affordable housing

Many jobs in Oxford still require people to attend their workplaces because they are jobs that are not possible to do remotely, such as in frontline healthcare, teaching in schools and universities, as well as those working in manufacturing and R&D labs. Many of these workers are unable to afford market housing or even private rented accommodation in the city and find themselves living outside of Oxford with expensive and time-consuming commutes into the city, or living in shared accommodation in Oxford that is too small for their needs.

Employer-linked housing is a bespoke approach that was introduced in Oxford in the LP2036, as an additional means to help increase delivery of much-needed affordable housing. The policy provides an alternative means of delivering affordable housing, to supplement the affordable homes delivered via Policy H2.

It involves housing being developed on specified sites, by specified key employers, in the city to provide a means of delivering affordable housing for their own staff. This allows those employers to help to address their own recruitment and retention issues by providing housing on their own land. A typical example is the NHS providing staff accommodation within the hospital sites. For most of the specified sites, employer-linked housing will only be one element of use on the site, for example operational hospital uses will be retained on the hospital sites, or schools will be retained alongside residential development.

Table XX Policy options set 002e Employer-linked affordable housing

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as	Provides an alternative mechanism for employers to actively help address affordable housing issues for employees, which although the homes would only be for staff, the provision of homes in turn could help reduce pressure on the housing register. Could support wider objectives of the Plan such as supporting economic growth with a sufficient workforce, and decreasing need to travel. The option could help to bring forward sites which landowners	Limited number of employers could benefit as they would need to own (suitable) land to build on and be able to act as a developer. It is important that this policy does not undermine delivery of Social Rent housing because the homes would only be available to employees of the organisations and not to those on the housing register (those in greatest need). Hence it should be restricted only to sites unlikely to deliver affordable

agreed with the local authority).	would otherwise not make available for residential uses (for example by being located on operational campuses, health facilities, or education sites).	general needs housing to households in housing need.
Option b Do not include an employer linked housing policy.	Less risk of undermining delivery of much-needed Social Rented housing, if the site were to be developed then the normal affordable housing tenure split would apply including provision of social rent.	Landowners may be put off bringing forward certain sites, if the development would not be solely for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Removing this policy could exclude an alternative potential supply of affordable housing or sterilise sites.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion?** the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** These options are about whether to allow certain employers on certain sites, to develop those sites as affordable housing for rent solely for their own staff. As the site would be 100% affordable housing, the normal affordable housing tenure policies would not apply but would be agreed on a site-by-site basis to reflect the requirements of the workforce of that specific employer. There is no specific policy framework for this type of provision in national policy, so the options are whether to have such a policy or not. In terms of sustainability impacts, option a would contribute positively towards **criterion 4 local housing needs** and **criterion 5 inequalities,** and also **criterion 12 economic growth.** Under option b, the normal affordable housing tenure requirements would apply which would include social rent, however landowners may not develop the site if it cannot be guaranteed for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Option b could therefore exclude an alternative potential supply of affordable housing or sterilise sites. Likely impacts of option b are therefore dependent on implementation, as it could mean sites developed for residential or it could mean sites not developed at all, entirely dependent on the landowner's intentions.

6. Conclusions including preferred approaches for Local Plan 2042

Having a good provision of affordable housing is crucial to retaining and attracting people to the city so that the economy can continue to grow and prosper. Should there be a high level of unaffordability in the city, many residents working in key sectors are likely to be forced to move elsewhere where homes are more affordable.

Being priced out of an area can also have social implications, especially if it means moving away from family or a place that someone would consider their home. Furthermore, with the cost of accommodation being so high the number of people on the Housing Register or at risk of becoming homeless in Oxford is likely to continue to grow. For all of these reasons, and more, the city council must tackle the issue of housing affordability in Oxford.

Key sustainability issues for the Local Plan to address in relation to delivering affordable housing from developer contributions:

- The plan should aim to continue seeking to improve the quantity of housing available in the city. However, it must also ensure that enough new homes are affordable in the Oxford context.
- Onsite provision of affordable housing can bring many benefits in terms of actually getting homes built, and in delivering mixed communities. But in some types of development, including purpose-built student accommodation and older persons accommodation, financial contributions for off-site provision may be more appropriate.
- Key employers in Oxford can also make a valuable contribution in addressing affordable housing needs, either via financial contributions from new commercial developments, or through developing employer-linked affordable housing, which in turn helps to address recruitment and retention issues.

Other plan-related issues

- Balancing the needs to deliver other important council priorities (e.g. low carbon development) with the cost of delivering affordable housing.
- Ensuring that any contributions required are deliverable financially and practically.

- Shared accommodation has a significant role as an affordable option for many living in the city, and therefore this type of living should be considered and planned for too.
- Continuing to work with neighbouring authorities to secure affordable housing as part of meeting Oxford's unmet needs, is also key to delivering affordable housing to meet identified needs.

6.1. Preferred approaches for the Local Plan 2042

Section 5 identified a number of topics that the Local Plan 2042 could include polices on to address objectives about delivering affordable housing. For each of these topics, there were options for policy approaches which could be taken, and these were presented in tables to compare the impacts.

Taking into account the various impacts from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Delivering Affordable Homes – Draft policy H2

The preferred approach for the Local Plan 2042 policy is to take forward a combination of Options A and B. So the overall target is that sites should contribute 40% of the homes in a development as affordable housing, on qualifying residential developments (of 10 or more C3 units, or equivalent number of C2 rooms). Within that 40% the draft policy also seeks to prioritise delivery of social rent homes, requiring 80% of the affordable homes to be social rent, with the remaining as intermediate tenures.

The viability evidence does not identify a particular level of affordable housing that most schemes could viably deliver, but suggests that a large proportion of the types of typical residential developments expected during the plan period could deliver this level. So whilst the 40% target is ambitious, the viability evidence suggests it could be applied on a maximum reasonable proportion basis whilst also allowing sufficient scope to meet other draft policy requirements.

Setting a lower proportion of affordable housing (either in part or the whole of the City) is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more than the revised target would no longer do so. Affordable housing delivery can therefore be maximised by adopting an ambitious target and accepting that this will not be universally achieved on all developments. Hence alongside

this policy, there is also Draft policy S4 which sets out a viability cascade, to ensure that the contributions towards affordable housing do not make any developments unviable

Affordable housing contributions from new purpose-built student accommodation – Draft policy H3

The preferred approach for the Local Plan 2042 policy is to take forward Option B, so that contributions from student developments are sought on a comparable basis to residential schemes i.e. for the equivalent of 10 self-contained dwellings. The Government Housing Delivery Test sets out a ratio of 2.5 student bed spaces to 1 dwelling. Therefore, with the threshold at 10 dwellings for residential development affordable housing contributions, the threshold for student accommodation will be 25 bed spaces (or 10 or more self-contained student units as these are counted in monitoring terms as a dwelling). The viability evidence suggests that a large proportion of the types of typical student developments expected during the plan period could deliver this level. Exemptions are specified in the policy where contributions would not be sought,

The draft policy seeks financial contributions towards affordable housing (rather than onsite provision) because in many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.

Affordable housing contributions from self-contained older-persons accommodation – Draft policy H4

The preferred approach for the Local Plan 2042 policy is to take forward

Employer-linked affordable housing – Draft policy H5

The preferred approach for the Local Plan 2042 policy is to take forward Option A. To allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).

The list of specified sites reflects willing landowners, plus crucially they are sites that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

Affordable housing contributions from commercial developments – Draft policy H6

This is a new policy, which needs further testing through the Regulation 18 consultation and viability. As such there is no preferred approach identified at this stage.

Background paper 003

Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.

This paper addresses Oxford's circumstances in relation to specialist housing provision including the provision of student accommodation, self build housing, housing for elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.
Relevant Local Plan Objective(s): A healthy and inclusive city to live in
Relevant SA Objective(s): 3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land. 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home. 5. To reduce poverty, social exclusion, and health inequalities. 6. To provide accessible essential services and facilities. 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.
SEA theme(s): Soil, Material Assets, Biodiversity, Population, Human Health, Cultural Heritage and Landscape.

1. Introduction 3

Student Accommodation 3

Self-Build and Custom Housebuilding 3

Elderly persons and other supported care housing 4

Gypsy, Traveller and Travelling Showpeople 4

Boat Dwellers 4

Boarding School Accommodation 4

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 4

National Plans, Policies and Programmes 4

National Planning Policy Framework and Planning Practice Guidance 4

Student Accommodation 4

Self-Build and Custom Housebuilding 5
Elderly persons accommodation ..... **Error! Bookmark not defined.**
Gypsy, Traveller and Travelling Showpeople 5
Boat dwellers 6
Boarding School Accommodation 6
Regional and Local Plans, Policies and Programmes 6
Student accommodation needs assessment 6
Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment 7
Specialist and Supported Housing Needs Assessment 7
Oxford Local Plan 2036 7
Student Accommodation 7
Self-Build and Custom Housebuilding 8
Elderly persons accommodation 8
Gypsy, Traveller and Travelling Showpeople 9
Boat Dwellers 9
Boarding School Accommodation 9
3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal) 9
Student Accommodation 9
Self-Build and Custom Housebuilding 9
Elderly persons and other supported care 10
Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers 10
Boarding School Accommodation 10
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 11
Student Accommodation 11
Self-Build and Custom Housebuilding 11
Elderly persons and other supported housing 11
Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers 11
Boarding School Accommodation 12
5. Options for Local Plan 2042 Policies 13

Policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO) 14
Policy options set 003b (draft Policy H10): Location of new student accommodation 16
Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs 21
Policy options set 003d (draft policy H12): Homes for travelling communities 23
Policy options set 003e (draft policy H13): Homes for boat dwellers 25
Policy options set 003f (draft policy H14): Elderly persons' accommodation and other specialist housing needs 27
Policy options set 003g (draft policy H15): Self-build and custom house building options 30
Policy options set 005h (draft policy H15): Community-led housing options 33
Policy options set 003i (draft policy H16): Boarding School Accommodation 35
6. Conclusions including preferred approaches for Local Plan 2042 37
6.1. Preferred approaches for the Local Plan 2042 38

1. Introduction

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

Student Accommodation

1.2 There are two higher education institutions within Oxford – University of Oxford and Oxford Brookes University. Provision of good quality, well managed student accommodation will be required, located in close proximity to those institutions.

Self-Build and Custom Housebuilding

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

Elderly persons and other supported care housing

1.4 There are various types of supported housing, mainly provided for elderly persons, but also for others with specialist housing and additional care needs.

Gypsy, Traveller and Travelling Showpeople

1.5 The Traveller community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans. Current and future accommodation needs for travelling communities were last assessed in 2024 at an Oxfordshire-wide level.

Boat Dwellers

1.6 Residential boats and their dwellers on both permanent and temporary visitor moorings, contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable.

Boarding School Accommodation

1.7 Oxford is home to several boarding schools which provide accommodation for their students.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Plans, Policies and Programmes

National Planning Policy Framework and Planning Practice Guidance

2.1 The National Planning Policy Framework (NPPF) makes it clear that to support the Government's objective of significantly boosting the supply of home, planning authorities should address the needs of groups with specific housing requirements and that policies should be informed by a local housing need assessment. At paragraph 63, the NPPF states *'Within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'*

Student Accommodation

2.2 Paragraph 04 (reference ID 67-004-20190722) of the Housing Needs of Different Groups Planning Practice Guidance (PPG) published in July 2019 and updated in May 2021 states "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide

low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."

2.3 Paragraph: 025 (reference ID: 68-034-20190722) of the Housing supply and delivery guidance published in July 2019 and updated in December 2024, allows for student accommodation to contribute towards an authority's housing land supply based upon the amount of accommodation it releases in the wider the wider housing market.

Self-Build and Custom Housebuilding

2.4 The Self-Build and Custom Housing Building Act 2015 (as amended by the Housing and Planning Act 2016) defines Self-build and Custom Housebuilding as *"the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person".*

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

Elderly persons accommodation

2.6 *The PPG explains that* 'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.' (Paragraph: 001 Reference ID: 63-001-20190626).

Gypsy, Traveller and Travelling Showpeople

2.7 The Planning policy for traveller sites was last updated in December 2024. A key update was to the definition of "gypsies and travellers" clarifying that persons of nomadic habit of

life, including those with a cultural tradition of nomadism or of living in a caravan are included within the definition. Paragraph 2 states that this document *"is a material consideration in planning decisions"*, whilst paragraph 3 specifies *"that, the Government's overarching aim is to ensure fair and equal treatment for travellers",* whilst also respecting the interests of the settled community. To help achieve this, the Government expects local planning authorities to make their own assessment of need and to plan for sites over a reasonable timescale.

Boat dwellers

2.8 The Housing and Planning Act 2016 (section 124) creates a duty under section 8 of the Housing Act 1985 to consider the needs of people residing in or resorting to a local authority area with respect to sites for caravans and the mooring of houseboats as part of the periodical review of housing needs. It deletes sections 225 and 226 of the Housing Act 2004.

Boarding School Accommodation

2.9 There are no national plans/policies or programmes relating to boarding school accommodation.

Regional and Local Plans, Policies and Programmes

Student accommodation needs assessment

2.10 The Oxford Student Needs Assessment (2023, Iceni), is a technical report which draws together various bits of data, including the profile of students in the city and the existing student accommodation profile of the two universities, including their future expansion plans. This is considered against the local context of Oxford where there is a significantly constrained land supply, with different forms of development competing against one another. The report makes some recommendations as to how the relevant policies in the Oxford Local Plan 2036 should evolve. These currently set out where new student accommodation can be located and as well as how many full-time taught course students can live outside of non-university provided accommodation.

2.11 The assessment concludes that it is for the Council to assess what its priorities are – that it is important to strike the right balance between restricting the location of new student accommodation, whilst considering the important economic role that the universities play in supporting Oxford's wider economy, the potential land available for development, and the alternative pressures for other forms of housing on the land available. It is recognised that without the thresholds in place, there is the potential for a growth in students to live in the wider housing market, including HMOs. This could put pressure on the private rental sector (particularly at the lower cost end) and could fuel rental growth. In turn, this could well reduce the ability of this sector to house lower income households, and result in increased levels of homelessness. However, if thresholds are to be set, regard should be had to the evidence in this assessment, but also to the available land supply and choices as to what the land is allocated for.

Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment

2.12 The Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment (2024, arc[4]) was undertaken on behalf of the city and all district authorities within Oxfordshire. It sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42 and establishes that Oxford City has a need of 0 for Gypsy and Traveller pitches and Travelling Showperson yards. However, the assessment does recommend that a criteria-based policy is included in any emerging plan for Oxford, as it provides a framework for assessing planning applications for these types of specialist housing. The assessment also clearly expresses that gypsies and travellers have different requirements from travelling showpeople and that this should be reflected in the criteria-based policy.

2.13 Paragraph 9.30 of the assessment notes that, *"the analysis of houseboat need would suggest there is additional need for residential moorings across waterways in Oxfordshire although there are complex dynamics relating to households living on waterways and accessibility to moorings. The principal location of residential moorings is in Oxford City."* Feedback from boat dwellers and stakeholders suggests that a range of 20-50 additional moorings should be made available, *"therefore, the current figure of 41 in the Oxford Local Plan 2036 as an expression of need remains appropriate."* (No specific needs for boat dwellers were identified in any of the district authorities.)

Specialist and Supported Housing Needs Assessment

2.14 Oxfordshire County Council has published a Specialist and Supported Housing Needs Assessment (2024, Housing LIN), which sets out the need for the various types of specialist and supported housing across Oxfordshire, broken down by district and over the next 10-20 years. This starts with background about the demographic profile and projections for each district. Oxford has a significantly younger age profile than the other districts, with significantly less growth of the elderly population expected. Nevertheless, there is still a need for additional accommodation over the plan period.

2.15 The study identifies a need in Oxford to 2044 of 1,030 additional retirement/sheltered homes (420 social/affordable rent, 100 shared ownership, 510 market). It identifies a need for 320 extra care units (145 social/affordable rent, 150 market and 25 shared ownership). The total need for housing to support those with autism or learning difficulties is 176 to 2039 and mental health related needs 287 (8% of the Oxfordshire because of the very significant concentration of existing provision within the city).

Oxford Local Plan 2036

Student Accommodation

2.16 The Oxford Local Plan 2036 (OLP2036), adopted in June 2020 is the current development plan for the city and sets out agreed planning policies for the city against which decisions

are made. Policy H8 seeks to restrict the provision of new student accommodation to specific locations – either on or adjacent to existing university campus sites; within the city centre or district centre or on a site allocated in the development plan to potentially accommodate student accommodation. This approach was intended to continue into the Local Plan 2040, albeit with some more flexibility, allowing new postgraduate accommodation to be built adjacent to existing postgraduate accommodation.

2.17 Policy H9 seeks to restrict the number of full-time taught course students that can live outside of non-university provided accommodation, with separate thresholds set for the University of Oxford and Oxford Brookes University. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. The Local Plan 2040 intended to carry forward this policy but with updated thresholds based on the latest data which was included in the 2023 Student Needs Assessment (2023, Iceni).

Self-Build and Custom Housebuilding

2.18 Policy H7 in the OLP2036 seeks to help encourage sufficient self-build and custom housebuilding to come forward and to support community-led housing. The policy approach is to set a threshold for self-build plots on residential sites. The policy requires 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. The policy also sets out expectations of what plots should have, including services, and access to the public highway. In addition, the policy requires the use of a legal agreement to ensure that self-build plots that have not sold after 12 months of marketing be built and bought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.

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

Elderly persons accommodation

2.20 The Oxford Local Plan 2036 Policy H11 is generally supportive of new elderly persons accommodation, and sets criteria to ensure it is appropriately located and provides a suitable living environment. The intention of the Local Plan 2040 was to continue this approach. This was supported by the County Council. It is recognised that, to be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to justify the on-site staff and facilities. Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.

Gypsy, Traveller and Travelling Showpeople

2.21 Policy H12 is a criteria-based policy which sets out all the requirements to be met for any new pitches for the travelling community, including for travelling showpeople. The 2024 assessment carried out by arc[4] confirmed that this approach could be continued into the new Plan but emphasised that the policy should reflect the differing requirements needed for gypsies and travellers, and travelling showpeople (the latter who need more space for equipment etc.)

Boat Dwellers

2.22 Policy H13 is a criteria-based policy which sets out all the requirements to be met for any new residential moorings or if appropriate, temporary visitor moorings. The 2024 assessment carried out by arc[4] confirmed that the findings of the previous Oxford Boat Dwellers Accommodation Needs Assessment (2018) used to inform this policy has not changed and that the demand/ need for 41 new residential moorings in Oxford remains relevant.

Boarding School Accommodation

2.23 The Local Plan 2036 didn't include any policies regarding boarding school accommodation.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

3.1 The latest Authority Monitoring Report (2023/24) indicates that both universities are currently operating within their respective thresholds for the number of students living outside of university-managed accommodation. One application for new academic floorspace was approved during this period which was compliant with Policy H9.

Self-Build and Custom Housebuilding

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

3.3 Since its introduction in 2016, there have been 140 registrations (139 individuals and 1 group) on the Self-build and Custom Housebuilding Register. As of April 2025 there are 75 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register. Analysis of the addresses of those on Part B of the register suggests that a further 6 individuals cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand.

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

Elderly persons and other supported care

3.5 There have been no planning applications for these types of development recently. It is to be expected that these types of development will only come forward sporadically, when a suitable opportunity arises.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

3.6 There have been no planning applications for these types of development during the last few years. However, the criteria-based policies within the Oxford Local Plan 2036 ensures that a policy framework is present to ensure that these types of applications can be assessed should they be submitted in the future.

Boarding School Accommodation

3.7 Recent applications

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

4.1 In the short term, very little would change without a new Local Plan. The latest Authority Monitoring Report (2023/24) indicates that both universities are still operating within their respective thresholds set out in Policy H9 which allows up to a certain number of full-time taught undergraduates to live outside of university managed accommodation. The Student Needs Assessment (2023, Iceni) suggests that these thresholds may not be suitable in the coming years as both universities are predicted to grow at a significantly faster rate than they have during the last few years. Therefore, there is potential for these thresholds to be continually breached and become outdated if a new Local Plan does not emerge which takes account of the latest evidence base.

Self-Build and Custom Housebuilding

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

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

Elderly persons and other supported housing

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

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

4.5 The approach to these types of specialist accommodation in the Local Plan 2036 was to have criteria-based policies, which are aligned to the NPPF. Therefore, very little would change without a new Local Plan as the criteria-based policies for the travelling community and boat dwellers would still apply to any application submitted.

Boarding School Accommodation

4.6 The approach to this type of accommodation is to prevent the loss of dwellings, especially with the significant competition for land and sites in Oxford.

5. Options for Local Plan 2042 Policies

5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 will need to take account of xxxxxx

5.2 The Local Plan 2042 therefore includes proposed policies in response to 9 topics:

- House of Multiple Occupation (HMOs),
- Location of new student accommodation,
- Student accommodation needs,
- Elderly persons accommodation,
- Gypsy and Traveller accommodation,
- Residential moorings,
- Self Build and Custom House building options,
- Community led housing,
- Boarding School accommodation

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO)

5.5 The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. For many, Houses in Multiple Occupation (HMO) offer the only available and affordable solution as renting individually or buying a property in Oxford is often too expensive. However high concentrations of HMO can result in changes to the character of the local area and it is therefore important that the supply of this type of home is monitored and controlled.

Table 5.1 - Policy options set 003a: Houses of Multiple Occupation (HMO)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).	This option would slow down the increase in the number of HMOs in specific areas where there are already significant numbers.	This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.
Option b Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size	Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly tensions that can occur because issues such as car and bike parking and bin storage can be integral to the scheme rather than retrofitting an existing building. This approach helps to address the unaffordability issues	It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs. It is possible that large purpose-built HMOs will be put forward in locations not suitable for student accommodation, with the intention that they will house students and act like student accommodation.

of these in particular areas).	for people living and working across the city, offering another option to those who would struggle to access housing otherwise.	
Option c Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.	This approach would acknowledge that the character of some areas is already influenced by the presence of HMOs.	It would be difficult to select an area for the concentration. It may lead to difficulties in building and maintaining a strong community, although HMOs do not always mean transient populations.
Option d Do not have any restriction on HMOs.	HMOs can be an important part of the housing market; meeting needs of those who can only afford to share but who wish to live in the city. In that sense it can help contribute to a balanced community.	HMOs can lead to pressures on services and streets for example with more bins and parking pressure. Homes do not always have sufficient amenity space for multiple households. HMOs are often a more short-term solution for people, so can create transient populations.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various options/combinations (e.g. option a, b, c or d, or a+b, c+b, d+b) **High-level screening conclusion? -** the options should be subject to detailed appraisal. **Screened in for detailed appraisal? -** Yes **Rationale:** In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations

then are how far such a policy goes in requirements and how these are geographically expressed. Options a and c represent alternative ways of addressing HMO proliferation, option a seeks to prevent a concentration anywhere above a threshold of 20% frontage, meanwhile option c instead defines geographically where HMOs would be accepted and where they would not. Option d is to not set any restrictions at all via the Local Plan. Option b could be carried forward on its own, instead relating to allowing new purpose-built HMOs but with restrictions on size, however it could also be combined with one of the other options.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly **criterion 4. Housing Need** in how they impact supply of new housing and deliver upon densification, as well as how they meet the particular needs of people on lower incomes. The options also impact on local amenity and street scene, as well as potentially the demand upon local services/facilities, which most closely matches **criterion 5. Inequalities**, **criterion 11. Urban design** and **criterion 6 Essential services**. Whilst options a, b and c are all likely to have positive impacts against housing need and inequalities as they serve to allow additional HMOs in varying ways to meet the needs of particular demographics, options b and c have the potential to have negative impacts against criterion 5, 6 and 11 where they could lead to additional harm to local amenity, character of the neighbourhood and additional demand on services locally (which option a seeks to avoid by ensuring the proportion of HMOs does not go above a certain threshold). Option c could lead to significant sustainability impacts particularly in relation to amenity and living environment in the areas that are designated as having no restriction, option d would further increase this impact by expanding the area of effect city-wide. Due to the varying level of sustainability impact arising across the potential options, it is considered justified to scope this option set in for detailed appraisal.

Policy options set 003b (draft Policy H10): Location of new student accommodation

5.6 It is important to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing. The policy options below consider the different types of approaches to locating student accommodation and the potential consequences of each option.

Table 5.2 - Policy options set 003b: Location of new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.	This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour. Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for.	Limiting locations does mean institutions may be less able to meet their needs. Concentrating student accommodations in these areas may mean that district centres and the city centre could be dominated by these accommodation types.
Option b Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the	This approach widens the suitable locations for student accommodation and opens more potential sites. However, it still means that students would not be accessing student halls along quieter residential streets.	The definition of arterial roads and when a development is 'on' them needs to be clear (i.e. how much of a setback is acceptable, what if the entrance is on a side road?). However, it may mean that arterial roads change in character and become dominated by student accommodation for long stretches. The character of many arterial roads currently is that of quiet residential streets and student accommodation can be reported as having a negative impact on neighbours in these areas.

city centre and on arterial roads.		
Option c Have no locational restriction on student accommodation but a criteria-based policy.	This would maximise the opportunity to meet student accommodation needs.	This approach would not help to address the competition between student accommodation and other housing types, potentially creating an imbalance within communities and drawing student accommodation into unsuitable areas.
Option d Allow new student accommodation only on existing campus sites and on existing student accommodation sites.	This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit feelings of disruption to communities of student accommodation that are sometimes reported.	This approach would not allow us to meet the requirements of the NPPF because it would not provide for enough student accommodation to come forward to meet the needs. This would mean a greater number of students in private rented accommodation, limiting its availability on the open market for others
Option e Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more (with potential to allow other occupiers outside of term-time if a management plan is agreed).	Full time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. Policy flexibility for outside of term time maximise occupation of the developments.	Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.

Option f Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow only operational and disabled parking, with the developer providing a mechanism to prevent residents from parking their cars anywhere on the site, (except for disabled residents).	This supports the policy approach to put downward pressure on parking in the city. The location of new student accommodation will be in sustainable locations with good accessibility to public transport, walking and cycling routes offering a realistic alternative to using a private car.	Will require appropriate monitoring and enforcement and if that is not in place could result in more cars in the city putting parking pressure on adjacent streets.
Option g Do not have any management restrictions on new student accommodation.	Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.	Without proper management of student accommodation all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b, c or d, in combination with Options e, e+f or g

High-level screening conclusion? - Some of the options are similar to each other from a sustainability perspective. However, where there are differences, such as between Option a and Option d, there is the potential to have significant sustainability impacts, therefore the options should be subject to detailed appraisal.

Screened in for detailed appraisal? - Yes, but only options A, B, C and D

Rationale:

Options a, b, c and d are all alternatives. Options a, b and d discuss restriction but to differing types of areas, whilst Option c has no geographic component and instead sets criteria.

Option e could be taken on its own. It seeks to restrict occupation of new student accommodation to full time students enrolled in courses of at least one academic year or more. Option f could be taken in conjunction with Option e, as it requires a management regime to be agreed which ensures that the development complies with parking standards that only allow operational parking and not residential parking. Option g is an alternative to Option e and Option e +f as it proposes not to have any management restrictions on new student accommodation.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly the impact of this particular type of accommodation on local amenity, which most closely matches **criterion 11. Urban design** (particularly in relation to street scene). The options also contribute to meeting the housing need of a particular community (students) so are relevant to **criterion 4. Local housing needs**. Option b is more negative for local amenity than options a or d because allowing student accommodation along arterial routes, has the potential to significantly change their character. Many of these routes are quieter residential streets which could then become dominated by student accommodation for long stretches, which could have a negative impact on the local community. Option b is slightly more positive for housing as it its less restrictive than options a and c, as it would allow more locations for student accommodation, albeit the positive is a minor one as it is only meeting the needs of one particular group. Option a would score lower than this due to geographical restrictions, these are less restrictive than Option d, which limits student accommodation to existing campus and student accommodation sites. This might result in this type of need not being fully met which would score a minor negative. Ultimately, due to the differences in the likely significant effects on restricting or not restricting the location of student accommodation, we have scoped this in for detailed SA appraisal to fully explore the potential impacts.

Options e, f and g also strongly relate to **criterion 8. traffic and associated air pollution** because they are about managing impacts of students on car parking and the impacts of vehicles on general amenity, because of the increased numbers of residents typically in student accommodation. Options e and e+f would have a minor positive effect on criterion 8 as restricting parking to operational (and disabled) use would reduce the amount of traffic and associated air pollution in the area as students would be using other

modes of transport or active travel. Option g would have either a neutral or minor negative impact, depending on implementation. However, Options E, F and G, are not considered necessary for testing through the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach, which is considered to be the area where there could be significant effects that need to be investigated further.

Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs

5.7 The NPPF (paragraph 63) lists students as a group whose housing needs should be understood and attempted to be met. The PPG also notes that there is a need to plan for sufficient student accommodation and that there is an expectation that options which support both the needs of the student population as well as the local population should be considered. The policy options below detail the different types of approaches.

Table 5.3 - Policy options set 003c: Ensuring there is enough student accommodation to meet needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if the threshold is breached. The details of the threshold will include the level set (which would reflect what is achievable) and the types of students	This is a long-standing approach which has been successful in ensuring the universities continue to strive to provide accommodation for most of their students and that this is considered in their wider development plans.	This policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. To be fair and reasonable, this must be related to the development and any related growth in students.

it applies to (not all). The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.		
Option b Only permit new academic facilities (of all types proposed by the universities or other institutions) that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option (b) is linked to option (a).	This could also be applied to all academic developments that create a need for student accommodation, not just the universities. It ensures the institutions act responsibly by only undertaking developments that create new capacity for students if they show how they will be accommodated.	This may be difficult to enforce and monitor and will not necessarily be easy to make a judgement about whether a development will create increased demand for accommodation from students. A lot will depend on the submissions of the institutions, and it will be important the policy makes it clear the level of evidence expected.
Option c Have no policy linking new academic facilities to student accommodation.	This would mean new institutions could be established in Oxford.	This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, a+b, or c **High-level screening conclusion? -** The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale:

Option a could be taken on its own - it seeks to set a threshold for (certain types of) university students living outside of university provided accommodation and prevent expansion of academic facilities should the threshold be breached. Option b expands on Option a by only permitting new academic facilities that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option c is an alternative to option a and option a +b as it proposes not having a policy linking new academic facilities to student accommodation.

In relation to the sustainability impacts of the options, primarily they impact on **criterion 4. Local housing needs** in how the Local Plan meets needs for students, but also how we protect loss of other housing to students and achieve the required balance. Local amenity is also relevant, which most directly relates to **criterion 11. Urban design** and the approach to expanding academic facilities relates to criterion **12. Economic growth**.

Options a and a+b will have a similar impact on criterion 4 and criterion 12 as this policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. This could have a minor negative impact on both of these criteria, although it would also ensure that there is a policy framework in place to ensure that accommodation for other types of housing need is not all lost to student accommodation. Option c suggests not having a policy linking new academic facilities to student accommodation, which may result in new institutions being able to be established in Oxford and would score a minor positive for criterion 12. Equally, Option c would score a minor negative on criterion 11 as there is the potential for current market and affordable housing to be lost to student accommodation, reducing the supply of this much needed housing in Oxford which is already in short supply, and for quieter residential areas to be dominated by student accommodation, which could have a negative impact on the local community. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003d (draft policy H12): Homes for travelling communities

5.8 The December 2024 update to the Planning policy for traveller sites made clear that the Government's overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community. The policy options below suggest different approaches to how this could be achieved.

Table 5.4 - Policy options set 003d: Homes for travelling communities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.	This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.
Option b Search for sites to allocate to meet an identified need.	This would ensure any identified needs were met within the city.	There is no justification to do this if no need within the city is identified. It might be that Oxford does not have any sites suitable for this use because of its compact urban character. Could unnecessarily preclude a site from other residential uses.
Option c Do not allocate sites or set out policy criteria – default to national policy (Planning Policy for traveller sites).	There may be no need to repeat national policy on this topic in the Local Plan. There would already be general policies of the plan that could be applied in these circumstances (for example on Green Belt).	In the event of a site coming forward there would not be any policy to help in the assessment of the impact, and there would be no guidance in the plan to suggest where that might go.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b and c are all alternative approaches to one another. **High-level screening conclusion? -** The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: The three options are alternatives to one another, but Option a and Option c are similar. The former sets out locally based criteria which might be more appropriate to Oxford's context should sites come forward, whilst the latter relies on the criteria set out in national policy. Neither of these options proposes to search for sites, unlike Option b, which would allocate sites to meet an identified need.

Primarily relates to **criterion 4. Local housing needs** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact as national policy is relied upon. Option a could also have a neutral impact as it doesn't allocate sites to meet this type of need, but the criteria included in the policy should any sites come forward, are more relevant to the local context of Oxford. Option a would score a minor positive in respect of criterion 6, as ensuring accessibility to local services forms part of the criteria to be met. Option b is potentially a minor positive in helping to meet housing need (criterion 4) (should one be identified) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6). Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003e (draft policy H13): Homes for boat dwellers

5.9 Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. There are several policy options below which suggest how this type of housing could be approached.

Table 5.5 - Policy options set 003e: Homes for boat dwellers

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a	Criteria can be developed to ensure that residential moorings have the facilities and services they need	If proposals for residential moorings do not spontaneously come forward, then identified needs for

Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.	to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.	moorings will not be met; this approach is not pro-active in trying to meet this need.
Option b Search for a site to allocate for new moorings.	If a site could be found this site would help to ensure identified needs are met. Current site allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
Option c Do not allocate sites or set out policy criteria.	None identified	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Options a, b or c are all alternative approaches to each other. **High-level screening conclusion? -** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** All the options are alternatives to each other. Option a proposes not to allocate sites but to have a criteria-based policy should applications come forward. Option b would allocate a site to meet identified need, whilst Option c would not allocate sites or set out policy criteria.

Primarily relates to **criterion 4. Local Housing Need** (meeting needs for a particular group), but also addresses **criterion 6. Services** (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact although this may depend on implementation, especially should an application for residential mooring be submitted as there is little national policy guidance in respect of moorings, therefore no clarity on how these applications will be assessed could be given. Option a and b are potentially a minor positive in helping to meet housing need (criterion 4) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6) - either through the criteria as in option a or in the process for allocating the sites as in option b. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Policy options set 003f (draft policy H14): Elderly persons' accommodation and other specialist housing needs

5.10 The NPPF (paragraph 63) lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a number of potential policy responses that could be considered. There are a wide variety of different housing types to support the elderly and those with additional needs. The need for these housing types is set out in Oxfordshire

Table 5.6 - Policy options set 003f: Elderly persons' accommodation and other specialist housing needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is supportive of elderly persons' accommodation of all types, but with criteria to be met that ensures it provides good quality living accommodation,	This approach ensures elderly persons' accommodation is in the right locations to provide the best quality of life for residents, making sure they have good local access to needed facilities and that they are not isolated and cut off from the wider community.	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

is in accessible locations and is part of a mixed and balanced community.		
Option b Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.	This would maximise the potential for proposals for elderly persons accommodation to come forward.	This would not require elderly persons' accommodation, so wouldn't necessarily result in its delivery. It could result in accommodation coming forward in unsuitable locations where the residents become or feel isolated.
Option c Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.	There are a range of specialist housing needs in the city, which are expected to increase over time. It is not feasible to require a whole site to be used to meet these needs. This approach provides a potential means of delivering housing to meet these needs. This approach would help deliver mixed and balanced communities and meet the widest range of needs.	This approach would reduce the amount of regular affordable housing provided to meet the needs of those on the housing list, which is the greatest need in Oxford. The need may still be too great to meet without too much harm to other aims, and it will be difficult to set a justifiable threshold for sites if it is not set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. Ultimately, in Oxford this policy is likely to be ineffective because there are simply not large enough sites available for this approach to be feasible. That is because there is a critical mass of units that are viable to manage. This need may be met on strategic sites just outside the city, or on sites where the developer makes a decision to bring forward a scheme wholly of this type of accommodation.

Option d Include a policy that is restrictive of types of elderly persons' or supported accommodation, for example private market flats available to older people but with limited onsite support.	This could prevent an imbalance in the type of elderly persons' accommodation, for example a large amount of expensive private accommodation with minimal care on-site.	An attempt to restrict elderly persons' or supported accommodation of any type generally is unlikely to be justified or beneficial, as some needs will be met by all types of elderly persons' accommodation. This would also limit opportunities to downsize and free up larger homes to the market.
Option e Do not include a policy relating to elderly persons or other supported accommodation	This would allow the market to respond to need spontaneously and without restriction.	It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs, it could lead to no new accommodation of this type or it may lead to unsuitable accommodation in unsuitable locations that does not help to address needs.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - the options are standalone options, rather than ones that could be combined. **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Only one of the options would actively require supported housing; the others are either supportive of it to a greater or lesser degree or would restrict particular types (in order to encourage others). Even the approach that actively requires supported housing could only apply to very few sites in Oxford, so would not have an impact significantly greater than the other options. PARA summarising the likely sustainability impacts (if any) in relation to the 12 SA criteria

Policy options set 003g (draft policy H15): Self-build and custom house building options

5.11 The NPPF lists people wishing to commission or build their own homes as groups whose housing needs should be understood and attempted to be met. It also states that local planning authorities should seek opportunities through policies and decisions, to support small sites to come forward for self build and custom housebuilding.

5.12 There are several policy responses that could be considered.

Table 5.7 - Policy options set 003g: Self-build and custom house building

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require a proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-build plots for large sites, for example all sites over 100 dwellings). Set threshold to meet identified need.	Gives an opportunity for being able to build your own home in a very constrained city. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet to really be tested so it could be that this does not meet needs or provides more plots than the level of interest and creates delays in delivery. Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.
Option b Require a smaller proportion of the overall number of units (or of the	This approach could give more certainty that sufficient plots will come forward, because it does not depend on large sites being delivered, and large sites are more easily delayed and the delay of one	The more land given to self-build housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments.

site area to be developed for residential use) to be made available as self-build plots for a larger number of smaller sites, for example all sites over 10 dwellings	site when the policy only applies to a few would have a greater impact. Therefore, this may give a greater opportunity for those on the self- build register to gain land to develop their own property.	Marketing of singular self-build flats on multiple sites is likely to be very challenging and unlikely to be practical.
Option c Allow exceptions to the policy where this would not work well (e.g. only flats, student accommodation). Set thresholds to meet identified need.	Such a policy approach ensures that this type of housing is only made available on sites where it would work well.	Sites that would allow exemption would be developed with no self build opportunities.
Option d Include a criteria-based policy which is positive towards but not requiring of self-build	Such a policy approach supports the delivery of other housing beyond self-build and custom build which is where there is the greatest need.	Without a specific policy there is potentially limited scope for people to find self-build plots, or custom housebuilding. This is not compliant with the Government's approach, which requires us to meet the need for self-build and custom housebuilding.
Option e Include in the policy that any self build plots that have been marketed but not sold over a specified time (e.g. 12 months) should be built and brought forward as	Such a policy approach gives an opportunity for those interested to gain land to develop their own property but acknowledges that if the plots have been marketed yet have not sold then they should be made available for the delivery of non self build housing as this is where there is greater need.	Demand for self build plots may vary over time and any new additions to the self build register would have reduced opportunities to develop their own properties as these plots would be lost.

dwellings in the usual way.		

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various combinations (e.g. either a, b, c or a combination of a+b+d or a+d or b+d). **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The self build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self build housing to come forward. The local context in Oxford leads to several potential options for how best to formulate a policy. Options a and b represent different levels of scope over which to apply a requirement (applying to either large sites only or sites over a smaller size threshold), whereas option c allows an exception to the prescriptive policy in circumstances where the provision of self built plots could undermine the delivery of other types of housing. Option d represents a more influential as opposed to prescriptive approach. Option e represents an additional dimension that could be incorporated with both options a and b or alongside option a or b. Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community. The high land values in Oxford however mean that the provision of self build plots isn't really an affordable housing model/ affordable way to access housing. Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and whilst focusing on larger sites (option a) concentrates delivery, focusing on smaller sites (option b) means that there is more dispersal geographically which could increase delivery times. Potentially option a could have a greater risk of homes not getting finished/ delivered as more smaller sites are likely to come forward than larger ones. Option c would likely have positive impacts.

Option d of not having a prescriptive approach would likely be neutral impact. Option e could have either a neutral or more positive impact, more positive if the plots are built out for self build but neutral if they are built out as non-self build. Overall the differences between the likely impacts of the options are not considered to be significantly different, none of the options have major impacts on sustainability.

Policy options set 005h (draft policy H15): Community-led housing options

5.13 The NPPF indicates that local planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing. There are several potential policy responses that could be considered.

Table 5.8 - Policy options set 003h: Community-led housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is generally supportive of community-led housing but does not have any requirements.	Gives an opportunity for being able to build your own home in a very constrained city, or develop community led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	This approach would actively ensure this housing type comes forward, so would not necessarily result in it being delivered.
Option b Require a proportion of the total site area to be available to groups wishing to develop	Gives a greater opportunity for community-led housing groups, to gain land to develop their own property.	More land given to community-led housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any

community-led housing (for example of over 100 dwellings).		requirement for self and custom housebuilding could lead to a significant decrease in the delivery of other housing types for which there is a greater need, including all tenures of affordable housing.
Option C Do not have a policy that is supportive of community-led housing schemes.	Such a policy approach supports the delivery of other types of housing for which there is greater need.	Without a specific policy there is potentially limited scope for people to join community-led housing schemes.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, or b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -** No **Rationale:** The local context in Oxford leads to several potential options for how best to formulate a policy. Option a shows general support but would contain no requirement for this housing type, which is probably appropriate given that whether it comes forward would be out of the control of developers. Option b would set a requirement for a certain amount of this housing type on large sites, although it would not be expected that there would be community housing groups necessarily ready to take up opportunities. Option c would have no policy support for this housing type. Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community. The high land values in Oxford

however mean that community housing isn't necessarily likely to be an affordable housing model/ affordable way to access housing.

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and opportunities could be taken to delivery this housing type by community housing groups if they are in a position to. The options would all be likely to have only a neutral effect on criterion 4.

Policy options set 003i (draft policy H16): Boarding School Accommodation

5.14 There is no national policy or guidance regarding the development of boarding schools. However, the context of Oxford would encourage a policy as Oxford has a very large housing need with significant competition for land and sites. There are several policy options that can address the development of boarding schools.

Table 5.9 - Policy options set 003i: Boarding School Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that allows this accommodation type in most locations, with some criteria guiding how they come forward.	This still accommodates for expansion of boarding accommodation but sets out a clear criterion which will protect the loss of C3 dwellings.	This approach would likely do little to prevent the competition of this accommodation type with other housing types tha meet housing needs.
Option b Include a more restrictive policy that limits the locations where this type of accommodaion would be permitted, for	This restricts boarding school accommodation to the locations where it is most suitable for students and tries to avoid potential issues with surrounding neighbourhoods.	Boarding schools may find this approach too restrictive if they have significant growth plans.

example to allow it only on existing school sites.		
Option c Do not include a policy relating to boarding school accommodation.	Boarding schools would have no restrictions on developing accommodation to meet their own needs.	This may cause the loss of C3 dwellings or compete with opportunities to delivery C3 dwellings, and may also cause harm to local neighbourhood and character of the area.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** The options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, it would be appropriate to consider having a policy as there is no specific NPPF guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy. There have been several recent planning applications for boarding school accommodation, demonstrating local demand. This type of accommodation is not classed as residential and does not form part of Oxford's housing need. The inclusion of a policy would enable the monitoring of growth and ensure that boarding school accommodation is granted where appropriate and not competing for much needed residential dwellings and development. In terms of sustainability impacts, the different options all score against **criterion 4. local housing need** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a neutral impact as this policy won't necessarily create or bring forward any new residential homes. Option b would have a neutral impact as it would be permitting limited development but still not bringing forward new residential development (although does the most to avoid competition with it). Option c could potentially have a minor negative impact as without a policy it could reduce sites available for residential development. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option.

6. Conclusions including preferred approaches for Local Plan 2042

6.1 Housing is a social need, so it is important to try to provide the right types of housing for those who need it. Specialist housing is not however a one size fits all and the accommodation needs of different groups will vary. The policies of the Local Plan can help address the varied needs for different specialist housing types.

6.2 For self-build and custom housebuilding, and most supported housing types, it is often the land availability or availability of large enough sites that is an issue, and therefore the plan must address how to provide for this type of housing in a city where there is a lack of housing provision more generally.

6.3 In terms of students, whilst housing students in purpose built accommodation can help to free up other housing types, leaving more available on the general market for others in the community, land that could be used for student accommodation is also likely to be suitable for the delivery of general housing and as such a delicate balance must be struck. Students can be accommodated in many ways, and how students are housed has other social consequences. For example, housing students in unsuitable locations could lead to local difficulties in the community with possible perceptions of anti-social behaviour within the community and could also lead to students feeling isolated and not fully part of the city. Attracting students is essential for the success of the universities. Provision of affordable accommodation for students is part of what the universities can offer. The universities make a significant economic contribution to the city and beyond and also carry out important research and development, which in turn has a social impact.

Key sustainability issues for the Local Plan to address:

6.1 Local Housing Needs:

- The plan should assess and respond to the need for specialist housing provision.
- The links between the provision of market and affordable housing and other specialist housing provision should be considered when developing policies.
- The significant competition for sites, between housing and other uses but also between housing to meet the needs of different groups, means that a balance needs to be struck.
- The potential implications of new student accommodation in different locations, for existing students and neighbourhoods and in terms of delivering sufficient housing of the right type should be considered

6.2 Inequalities:

- The plan should address how the supply of new housing can meet the needs of particular demographics.

6.3 Urban Design:

- Housing, of various types, needs to be appropriately located, considering amenity of existing neighbours, and suitability for new proposed residents.
- The plan should address the extent to which additional specialist housing in particular areas could have implications for the local amenity/character of the neighbourhood.

6.4 Essential Services:

- The plan should address whether new housing could potentially place a greater demand on local services and facilities within areas.

6.1. Preferred approaches for the Local Plan 2042

6.5 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address specialist housing provision. Under each of the topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Houses in Multiple Occupation – Draft policy H9

6.6 The preferred approach for the Local Plan 2042 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

6.7 The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward to meet needs, in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. Option B relates to purpose-built HMO and is not a preferred option as provision of this type of accommodation reduces potential for delivering housing that meets greater needs (such as social rented housing). There is also potential that under option B large purpose-built HMOs may be put forward with the intention of them housing students, in locations where purpose-built halls of residents would not be permitted. Option D does not set any restrictions at all via the Local Plan and whilst the lack of any restriction may not make a difference in some areas of the city, there is potential for a significant amount of HMOs to come forward in other areas at the expense of meeting other housing needs. It is for this reason that option D is not a preferred option.

6.8 The options set was tested through the Sustainability Appraisal with Option A and C scoring more positive than Option D. Option D scored negatively against SA objective 4

whilst options A and C had some positive and some negative. Option D also scored negatively against SA objective 11, whilst Option A was neutral and Option C potentially could have negative impacts, depending on implementation. Option B, which is an additional element to the policy that could be combined with the others, rather than an alternative approach to them, might have additional positive sustainability impacts, for example for SA objective 5 if it was to be taken forward, however, Option B is not proposed as part of the preferred approach as discussed above.

Location of New Student Accommodation – Draft Policy H10

6.9 The preferred approach is a combination of **options A, E and F**. Options A, B, C and D were tested through the SA in order to further explore their potential sustainability impacts. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. Option A is supportive of locating student accommodation in the most suitable places adjacent to existing institutions or student accommodation sites to avoid potential issues with unneighbourly behaviour, and in sustainable locations such as city and district centres. Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for, whilst ensuring that other sites that are most suitable for general market and affordable housing can be developed for those purposes. Options E and F ensure that full-time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. It also allows for policy flexibility for outside of term time to maximise occupation of the developments, whilst supporting the policy approach to put downward pressure on parking in the city.

Linking New Academic Facilities with the Adequate Provision of Student Accommodation – Draft Policy H11

6.10 The preferred approach for the Local Plan 2042 is to include a policy which set thresholds for university students living outside of university provided accommodation and also prevents expansion of academic facilities if the threshold is breached. The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and affordable housing which is a priority for this Plan. Of the three options considered, **Options A and B** in combination is the preferred approach which reflects this balance that needs to be struck.

Homes for Travelling Communities – Draft Policy H12

6.11 To support the travelling community, the preferred approach for the Local Plan 2042 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that

their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

6.12 Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for gypsy and traveller pitches and travelling showpeople yards to be assessed against should they come forward, where all criteria will need to be met, whilst not allocating sites.

Homes for Boat Dwellers – Draft Policy H13

6.13 To support those people who wish to live on boats, the preferred approach for the Local Plan 2042 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

6.14 Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for residential moorings to be assessed against where all criteria will need to be met, whilst not setting out specifically where these moorings should be located.

Older Persons and Other Specialist Accommodation – Draft Policy H14

6.15 The preferred approach for the Local Plan 2042 is to have a local policy that sets criteria to guide where and how this type of accommodation comes forward. It is not proposed to set any kind of requirement for this housing type. That is because of the lack of opportunity to do so in the city, which lacks sites of a large enough capacity.

6.16 Whilst either of the four options, option A, B, C, D or E could be taken forward, the preferred approach is **Options A.** This option is supportive of elderly persons accommodation, but reflects both the fact that there is only a modest need in Oxford, compared to a significant need for other housing types, and that this housing type is likely to come forward in an unpredictable way, in response to a variety of factors that may influence the landowner, rather than being predictable enough to enable an allocation. It also reflects the fact there are no sites large enough for this to come forward as a requirement for part of a site over a certain size.

Self-Build and Custom Housebuilding – Draft Policy H15

6.17 To support people wishing to build their own homes, the preferred approach for the Local Plan 2042 is to include a policy that requires self-build/ custom built plots to be made available.

6.18 Of the five options, either option or various combinations of these could be taken forward. The preferred approach is a combination of **Options A, C and E** which will provide an

opportunity for this type of housing to come forward on sites that are suitable and where it would work well, yet also ensures that any plots marketed for self build that have not sold after a certain period of time can be made available for other housing as this is where there is a greater need.

Community led housing – Draft Policy H15

6.19 To support community- led housing schemes, the preferred approach for the Local Plan 2042 is to include a policy that supports this type of housing. Of the three options, either option could be taken forward. The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward on sites that are suitable. Although acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, community-led housing has been incorporated within policy H15 rather than a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

Boarding School Accommodation – Draft Policy H16

6.20 The preferred approach for the Local Plan 2042 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sies or adjacent to them.

6.21 Whilst either of the three options, option A, B, or C could be taken forward, the preferred approach is **Options B.** This option limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applicaitons against, only the locational restriction.

Background paper 004

Title: Employment and Inclusive Economy

This paper addresses jobs (including knowledge-based jobs, jobs for unskilled residents, apprenticeships and jobs to support a diverse economy) and considers how best to use land to support and diversify the economy. **It addresses how the Local Plan can best use land to support and diversify the economy while fostering growth in key sectors including science and innovation.** **It considers how best to support local people and businesses access the training and opportunities they need to enable them to prosper.**
Relevant Local Plan Objective(s): • Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
Relevant SA Objective(s): 11. To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge-based economy and the culture/ leisure/ visitor sector.
SEA theme(s): Population and material assets.

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 2

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 11

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 16

5. Options for Local Plan 2042 policies 21
6. Conclusions including key sustainability issues 48

1. Introduction

1.1 This topic paper focuses on Oxford's economy, employment and the importance of research and development, education and skills. Oxford is recognised as a globally known brand. It has major assets which include two leading universities, and cutting-edge research in areas including bio-tech, data science, quantum technology and robotics. The city is home to diverse international enterprises including BMW Mini, Oxford University Press, Unipart, Centrica, Amey, Nielsen and TripAdvisor among numerous others. The city's economy plays a key role within both a wider regional and national context. Despite this, Oxford's level of unemployment is higher than the national average. Although it is a city renowned for education, disparities in education levels do exist and there are examples of areas where there is a deprivation of skills.

1.2 This topic paper provides a brief summary of the relevant national, sub-regional and local plans, policies and programmes that currently exist and are likely to influence change in the future. There is a section on Oxford's economy and its importance to the national economy, which includes some headlines that help to define the economy of the city, its job growth, key and potential emerging sectors. There is a section on Oxford's existing education facilities. This includes some key indicators identifying the importance of these education facilities to both Oxford and Oxfordshire. As part of an assessment of the current situation some of the key challenges and future trends that impact the local economy are identified. The next section explores what would happen without a new plan and the potential issues that the city would face. The final section provides some conclusions and sets out some of the potential sustainability issues which the plan is likely to face.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Industrial Strategy: Invest 2035

2.1 The publication of the Government's Green Paper – Invest 2035: the UK's modern industrial strategy – sets out this administration's "commitment to develop a modern, targeted industrial strategy, with the objective of long-term, inclusive, and resilient growth, by spurring investment into all parts of the UK".

2.2 The National Industrial Strategy focuses on "stimulating investment and activity in sectors with the highest growth potential". It identifies eight growth-driving sectors to be prioritised

across services and manufacturing. These sectors are based on both existing and emerging strengths and are as follows:

- Advanced manufacturing
- Clean energy industries
- Creative industries
- Defence
- Digital and technologies
- Financial services
- Life sciences
- Professional and business services

2.3 Oxford and Oxfordshire are home to the majority of these identified growth-driving sectors. Driven by the existing presence of two successful universities, and their close ties to research and industry, there is significant potential for Oxford and Oxfordshire to further develop and deliver these nationally important growth-driving economic sectors.

National Planning Policy Framework (December 2024)

2.4 The NPPF gives a clear steer towards supporting economic growth through planning policies and it is clear significant weight should be placed on the need to support sustainable economic growth and productivity.

2.5 The NPPF sets out a requirement for a clear economic vision and strategy, which positively encourages sustainable economic growth having regard to the national industrial strategy and any relevant Local Industrial Strategies and local economic development and regeneration policies. It also sets out that Local Plans should develop policies that help to create the conditions in which businesses can invest, expand and adapt to meet anticipated needs over the Plan period.

2.6 The NPPF sets out a key economic objective which requires policies ‘to help build a strong, responsive and competitive economy’. This aims to ensure 'that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.’ Planning policies are also required to ‘create the conditions in which businesses can invest, expand and adapt’ and to positively respond to the ‘need to support economic growth and productivity’.

2.7 The NPPF highlights the importance of meeting the specific locational requirements of networks and clusters including the knowledge and data driven sectors, creative or high technology industries. National advice also requires a policy approach that ‘should allow each area to build on its strengths, counter any weaknesses’, and address ‘the challenges of the future’. This is considered particularly important where ‘Britain can be a global leader in driving innovation’ and in ‘areas of productivity’ which should ‘capitalise on their performance and potential.’

Planning Practice Guidance (PPG)

2.8 The PPG includes guidance about how local authorities should prepare and maintain an evidence base regarding the economic needs of their area. In working out the business needs for an area, consideration should be given to a range of factors including evidence of market demand; wider market signals relating to economic growth, diversification and innovation; the existing stock of land for employment uses and the recent pattern of employment land supply and losses. It also sets out a method for assessing economic land availability.

Oxford-Cambridge Growth Corridor

2.9 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxford Cambridge Pan-Regional Partnership

2.10 In January 2023, the previous Government confirmed support for the establishment of an Oxford to Cambridge Pan Regional Partnership following a proposal by leaders from local councils, local enterprise partnerships, the Arc Universities Group and the area's transport body – England's Economic Heartland. However, following an announcement in the Autumn Budget, a decision was made by the new Government not to fund the Oxford to Cambridge Pan-Regional Partnership in 2025-26.

PwC Good Growth Cities Index 2024

2.11 PricewaterhouseCoopers (PwC) produce an annual Good Growth for Cities Index. The most recent version of this Index, published in September 2024, which compares 51 UK cities using a number of different metrics, saw Oxford fall from its position as the top performing city (a position it had held since 2017) to tenth place overall (just ahead of Cambridge). The report showed cities across the West of England led the index this year.

2.12 PWC's research said that the public were most focussed on issues impacting their financial well-being, with measures such as income, jobs and housing seeing the biggest increase in importance to the public. This shift in priorities has impacted the performance of cities, with the historically strongly performing cities of Oxford and Milton Keynes seeing the most significant decline in scores, performing less well on income distribution, housing and high streets and shops.

Fast Growth Cities – 2021 and Beyond – Centre for Cities

2.13 The Fast Growth Cities Report 2021 provided an update to a report from 2016. The cities that make up the Fast Growth Cities group (comprises of Oxford, Cambridge, Milton Keynes, Norwich, Peterborough and Swindon) were considered as some of the most successful and innovative places in the UK. The Fast Growth Cities Report focused on six key areas:

- Labour markets, skills an education;
- Businesses and growth;
- High Streets and city centres;
- Housing and planning;
- Transport; and
- The economic impact of the pandemic.

2.14 The report recognises that the Fast Growth Cities group contains some of the UK's most successful cities, many of which (including Oxford) have a significant impact beyond their boundaries.

Oxfordshire Local Enterprise Partnership (OxLEP)

2.15 Oxfordshire's wider economic vision and strategy are contained within several documents produced by the Oxfordshire Local Enterprise Partnership (OxLEP). These include the Strategic Economic Plan (SEP), and its supporting Action Plan, the Local Industrial Strategy (LIS), and Local Investment Plan (LIP). The SEP was first produced in 2014 and was refreshed in 2016. OxLEP recently (December 2023) published a refreshed SEP which to help drive productivity, prosperity and wealth for all whilst accelerating Oxfordshire's transition to net-zero.

2.16 The SEP aims to champion good, sustainable growth that realises a shared ambition that by 2033, people and communities across Oxfordshire will be benefiting from new opportunities which are created sustainably through local enterprise and innovation.

2.17 The LIS was published in July 2019, and it describes Oxfordshire as a global centre of research and innovation, home to a number of world-leading science and technology companies located across business clusters and hubs, forming a hive of knowledge-intensive economic activity. It describes how cutting-edge products and services are solving challenges in healthcare, mobility, energy and communications, meaning Oxfordshire's success is critical to the UK.

2.18 The key sectors and technologies that Oxfordshire excel in have 'global reach', meaning we are a critical driver for UK economic growth. A primary aim of the strategy is to build a global innovation ecosystem in Oxfordshire by 2040. Existing and proposed developments in Oxford are central to this, including the West End.

Oxfordshire Leaders Joint Committee (OLJC)

2.19 The joint committee's purpose is to deliver the aims of the Oxfordshire Strategic Vision, adopted by all six councils. The Oxfordshire Strategic Vision aligns with the ambitions of OxLEP's Strategic Economic Plan (2023) and sets out a set of guiding principles, a set of outcomes to be achieved by 2050, and a definition of "good growth". Taken together, these form an overarching approach to long-term sustainable development in Oxfordshire.

2.20 The OLJC consists of all six Oxfordshire authorities and makes several commitments, including to:

- Coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefit.

Oxfordshire's Innovation Engine 2023 – Advanced Oxford

2.21 Oxfordshire's Innovation Engine 2023 reassesses the Oxfordshire's Science and technology ecosystem providing an update from the 2013 Innovation Engine Report – Realising the Growth Potential. The report looks forward, but also back over the past decade to see whether the growth potential has been achieved. The report recognises that despite the challenges associated with collecting reliable economic performance data that Oxfordshire appears to have a thriving and diverse innovation ecosystem. It sets out that while the region's knowledge economy has grown, high and medium-tech manufacturing has declined (although this may be more down to a more mature ecosystem).

2.22 There is a growing stock of innovation space with many new developments in the pipeline which will add much needed capacity into the system in the next five years. Housing and transport continue to be key challenges and need to be addressed. Other infrastructure needs investment too, particularly data connectivity and supply of power.

2.23 The report makes six recommendations if Oxford's innovation ecosystem is to continue to flourish, strengthen and play a pivotal role in making the UK a beacon for science, technology and innovation:

- Strengthen leadership across the region in relation to innovation;
- The City Council and County Council need to work together to develop a much- needed future-looking transport system which is Oxfordshire wide, not just focused on the city of Oxford;
- Grow and diversify the number of risk capital investors operating within the region;
- Develop a new, clear strategy, with collective buy-in, for inward investment into the region. Different players within the ecosystem need to work together to ensure that Oxfordshire is open, coherent and can respond to potential investors;

- Join up nodes of innovation across the region and help internal and external stakeholders to navigate the landscape through better defined pathways and connectors; and
- Develop a suite of communication tools and assets, tailored to the needs of different audiences, which can be used by all players, to tell Oxfordshire's innovation story.

Oxford City Council – Our Strategy 2024-28

2.24 The Council's corporate plan entitled, Our Strategy 2024-28 sets out five key priorities to support Oxford's ambition to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. One area of focus for the strategy is to support a strong fair economy under which the three priorities for the Council to deliver are as follows:

- Secure, fairly paid, local jobs for Oxford's residents and access to skills and reskilling training
- Using Oxford's unique strengths in a global economy to attract high quality investment
- Supporting development to boost economic activity and deliver benefits for all

Oxford City Council Economic Strategy 2022-32

2.25 Oxford's Economic Strategy seeks to establish a new standard for economic inclusion in the city, underpinned by the strength of an impactful global city, evolving in a way which recognises environmental limits and harnesses the opportunity of a zero-carbon economy. The Economic Strategy highlights Oxford's significant specialisms as:

- Health and Life Sciences; Technology and Digital; Creative Production; Green and Low Carbon; the Visitor Economy; and Social Enterprises and co-operative businesses

2.26 Oxford's Economic Strategy recognises that Oxford's economy has a positive global impact and as a hub of education and knowledge, it has a clear purpose to address many of societies' challenges through science and technology. Oxford City plays a key role developing research and incubating early-stage companies. It is one of Oxfordshire's most sustainable locations to locate employment, due to its critical mass, and connectivity to transport and research assets. It recognises Oxford's physical capacity constraints, and the need to deliver commercial floorspace in such a way that does not compromise wider placemaking, zero carbon and green and sustainability objectives.

2.27 The City's ambition is to ensure that the anticipated growth is of good quality, in the right location, supported by appropriate infrastructure and contributes to an inclusive economy.

Oxford City Centre Action Plan 2021-2030

2.28 The City Centre Action Plan (CCAP) sets out four workstreams, each intended to focus on a different thematic area of work. Each workstream is defined by a series of objectives, under which projects are identified. The four workstreams are:

- Connectivity and access:
    - To be delivered by limiting private vehicles, reducing conflict and congestion and creating spaces for buses, bikes and people;
- Public realm and animation:
    - To be delivered by improving the public realm and providing events and experiences to animate it and boost dwell times;
- Getting the mix right:
    - To be delivered by building on Oxford's world-class innovative and creative spirit, enhancing the city centre as a place to live, start and grow a business, visit, and play; and
- Get the basics right:
    - To be delivered by creating an inclusive, safe, and attractive city centre that mediates and promotes a diverse range of activities and uses.

2.29 The City Centre Action Plan also includes a series of objectives under each workstream. Not all of these can be directly influenced by the Local Plan 2040 as some need to be undertaken in partnership with colleagues, for instance, at the County Council.

Oxford Local Plan 2036 (Extant plan)

2.30 The policy approach for the city's economy seeks to build on Oxford's strengths and ensure the delivery of prosperity and opportunities for all. Oxford is home to many jobs with particular concentrations in the higher education, research and science sectors. The economic performance of the city is influenced by wider sub-regional and national plans. These include Oxfordshire's Strategic Economic Plan (refreshed in December 2023), the Local Industrial Strategy (2019) together with the Oxford Cambridge Pan Regional Partnership (confirmed by Government in January 2023) and the Oxfordshire Housing and Growth Deal (2017).

2.31 Oxford's employment strategy in the Local Plan 2036 seeks to protect the city's existing network of well-performing employment sites, while supporting the release of poorly performing sites to other uses (including housing). Policy E1 categorises the city's network of employment sites according to their importance to the national and local economy. Category 1 employment sites are the city's most important employment sites supporting the national economy or are significant local employers or sectors. Category 2 employment sites provide local services and facilities, whilst Category 3 are generally smaller, less well-performing sites.

2.32 Policy E1 supports the modernisation and intensification of any category of employment site. The modernisation and intensification of any employment site will be supported in principle where it can be shown that the new development makes efficient use of land and does not result in adverse environmental issues. Generally, the approach taken is to resist the loss of employment floorspace at category 1 or 2 sites, but it in the case of poorly performing Category 3 sites, a criteria-based approach is taken which, if satisfied, may allow the release of some or all of the site to other uses such as housing.

2.33 The Local Plan 2036 also provides policy support for the sustainable growth of the city's two universities - Oxford Brookes University and The University of Oxford. This support allows these institutions to maximise the economic, social and cultural benefits they both bring to the city.

2.34 Oxford is also a major centre for teaching hospitals and home to a number of acute and specialist medical research organisations. These medical research organisations link closely with healthcare research undertaken at the two universities. Research and development and teaching uses associated with health and the hospitals is supported in principle given their role as one of Oxford's key sectors. Proposals for new educational, teaching and academic institutions need to show how they support the objectives and wider policies in the Plan.

Employment and Skills Plans:

2.35 The Oxford Local Plan 2036 encourages the use of Employment and Skills Plans or Community Employment Plans to help mitigate the impact of development and support an inclusive economy. Employment and Skills Plans seek opportunities including ensuring local people can access job opportunities arising from development at both the construction phase and once development is in operational use.

Development opportunities

2.36 There are limited remaining vacant plots at The Oxford Science Park and at ARC Oxford (formerly Oxford Business Park). Both these "Category 1" employment sites have seen major development recently bringing forward a large amount of employment floorspace supporting Oxford's key strengths. A number of these recent development proposals are now under construction and due to be completed in the short-term. Some of the city's employment sites contain older buildings that are currently in employment uses. These sites cumulatively have significant redevelopment potential for modernisation and/or intensification within the plan period. Development opportunities are also being realised at Oxford North with a sizeable amount of floorspace being built out under a series of reserved matters planning applications that support an outline granted in 2021. There is also significant scope for the redevelopment of brownfield sites, particularly those in and around the wider West End of the city. Such sites include Oxpens, the 'Island Site', Oxford Station, longer-term opportunities at Osney Mead, and the more immediate opportunities involving the transformation of Botley Road Retail Park.

Employment Land Supply

2.37 Oxford City Council monitoring data shows the changes to the city's economic landscape that have been taking place over the past few years.

2.38 Table 2.1 shows that from the start of the plan-period, there has been significant additional floorspace permitted within the Office and R&D use classes - 144,869sqm additional net (GIA) floorspace, the majority of which is now under construction and due to complete in the next five years. Since the start of the 2025-26 monitoring year, one additional planning permission has been issued for a net increase of 12,448sqm GIA floorspace for office/ R&D uses at the Eastpoint Business Park (application reference 24/01631/FUL).

Table 2.1 - showing planning permissions granted involving employment-generating uses. All figures expressed as a net increase in sqm (GIA)

Monitoring year	B1/ E(g)	B1a/ E(g)(i)	B1b(E(g)(ii)	B1c(E(g)(iii)	B2	B8
2022/23	282	1,823	2,093	1,349	-12,173*	0*
2023/24	80	29,319	56,482	-343	25,359	0
2024/25	2,230	25,942	27,428	1,558	-615	22,351*
Total	**2,592**	**57,084**	**85,193**	**2,564**	**12,571**	**22,351**

** Linked applications at the site for a series of temporary permissions for open-air storage within the wider Unipart Site. B2 Building demolished (-12,713sqm) under prior approval.

2.39 Table 2.2 shows the total Office/ R&D floorspace permitted (i.e., where a decision notice was issued), within the plan-period to date.

Table 2.2 - Permissions granted (Decision Notice Issued) within the plan period to date.

Source of supply	Office/ R&D floorspace net (GIA)
Permissions granted between 2022/23-2024/25 *(Decision Notice issued)*	144,869sqm
Permissions granted since 01 April 2025 *(Decision Notice issued)*	12,448sqm
Total permissions granted *(Decision Notice issued)*	**157,317sqm**

2.40 A number of 'live' planning applications are proposing Office and R&D uses are at various stages of the decision-making process. For instance, four development proposals already benefit from "resolution to grant" planning permission. These schemes, which have already been to planning committee, account for 88,747sqm of the current 'live' planning applications. Table 2.3 shows the 'live' applications at the various stages of the decision-making process.

Table 2.3 - 'Live' applications at the different stages of the decision-making process

Source of supply	Office/ R&D floorspace net (GIA)
Planning committee 'Resolution to grant' *(Decision Notice not yet issued)*	88,747sqm
Remaining 'live' applications *(Under consideration)*	54,079sqm
Total	**142,826sqm**

2.41 A number of other sources are needed to fully understand the employment supply pipeline for the plan period. Previously granted permissions likely to be implemented within the plan period (e.g., Oxford North) is one such source. Another source that makes up the employment supply pipeline comes from conversations with landowners and developers who are in a position to be able to share future land intentions. This process is being carried out as part of a wider review of employment land in the city.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Oxford's Economy

3.1 According to the Labour Market Profile for Oxford, the city was home to 4,915 businesses, collectively employing approximately 126,000 people in 2023. A high proportion of businesses in the city are micro or SMEs (small or medium sized enterprises). In fact, 96% of all businesses in Oxford are micro- (less than 9 employees) or small- (10 to 49 employes) businesses (UK Business Counts, 2024).

3.2 Oxford also has the highest employment rate in the county. The city's importance as an employment location is demonstrated by its job density ratio of 1.13 (2022), which is above the South-East (0.87) and Great Britain (0.87). According to the City Council's Economic Strategy, in 2019 it was estimated that Oxford contributed £6.8bn to the national economy annually.

3.3 The University of Oxford generates more spin-outs than any other university in the country. According to the Oxford University Innovation and University of Oxford Impact Report 2024 - Shaping the Future: Oxford's Innovation Impact, the University has been involved in the creation of more than 300 companies. Research and development, (R&D) is one of the current growth sectors in Oxford linked directly to the Universities and hospitals. The Covid-19 Pandemic and the ground-breaking research on vaccines with the development of the Oxford AstraZeneca vaccine has helped to highlight Oxford's global importance and its

contribution to both the national and local economy. The strong links between healthcare in practice and research are critical.

3.4 A Research Report published in 2021 by the Centre for Cities, entitled Fast Growth Cities – 2021 and beyond showed the importance of a section of fast-growing cities, such as Oxford, and the need to build on their respective strengths as a crucial means of achieving future growth. Innovation systems, such as those established within the city comprise business dynamics, skilled labour and innovative outputs such as patents which together provide the platform for delivering economic growth. The 2021 study confirmed that innovative places, such as Oxford, are likely to be the first places to benefit from the ongoing change in the economy, since they are directly involved in the development of solutions or have the right dynamics to adapt their business models.

3.5 Oxford is therefore well placed to help to drive forward national economic growth by supporting the nationally identified growth driving sectors through the ground-breaking research and development undertaken within the city, which benefits from its strong links between the University of Oxford and the hospitals together with key related commercial firms that are established in the city.

3.6 In 2023, the importance of "Innovation Hotspots" was highlighted by the Centre for Cities in a report entitled Innovation hotspots – clustering the new economy. Hotspot areas, such as Oxford, involve the clustering of businesses and cutting-edge industries. These areas have been more productive and have grown faster since the financial crisis than those areas that do not benefit from clustering.

3.7 The Labour Market profile for Oxford (produced by Nomis) indicates that the total number of jobs in the city peaked in 2018 at 144,000. Since then, the total number of jobs in Oxford had fallen each year to a low of 127,000 jobs in Oxford in 2021. The number of jobs fell most rapidly between 2019 and 2020, where the number of jobs in the city reduced by 9,000. The most recent figures suggest an increase of 4,000 jobs from 2021 levels which means there were 131,000 jobs in Oxford (2022).

Availability of broadband

3.8 Oxfordshire County Council's Digital Infrastructure Programme aims to improve digital infrastructure across the county and their work includes bespoke projects such delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

3.9 Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mps).

Employment by type

3.10 Official census and labour market statistics from the Office for National Statistics are provided by Nomis. Nomis provides labour market profiles for local authority areas. Oxford City's labour market profile is available on the Nomis website. The statistics for "Employee jobs" shows a sectoral breakdown of employees in Oxford by Industry. At the time of writing the most recent data is for the year 2023.

3.11 This dataset shows a large number of people are employed both in "education" (38,000) and in the "human health and social work" sector (25,000) in Oxford. These two sectors make up 50% of all employee jobs in the city. By comparison, these two sectors represent just under 23.8% of all employee jobs across the South East and 22.5 of all employee jobs nationally. This is significantly more people than are employed in the next two largest sectors. Employee jobs in "information and communication" (11,000) and "professional, scientific and technical activities" (10,000) together account for 16.6% of total employee jobs Oxford.

Employment levels

3.12 The Nomis website provides statistics about both employment and unemployment levels within Oxford's labour market profile. At the time of writing the most up-to-date information presented on the Nomis website was for the time-period between July 2023-June 2024. This showed that Oxford's unemployment rate at 3.8%, was slightly higher than the national average of 3.7%.

3.13 The Nomis website also provides information on the number of Jobseekers' Allowance (JSA) claimants. This information is also found within the Oxford's labour market profile. It shows that as of November 2024 there were 3,290 people claiming Job Seeker's Allowance or Universal Credit (UC). This represents 2.8% of the working population. This shows a reduction since March 2021 when there were 5,040 claimants representing 4.3% of the working population (i.e., people aged between 16-64 years old).

Micro, Small and Medium Sized Enterprises (Micro SMEs)

3.14 Micro SMEs represent a significant proportion of the city's employment ecosystem. According to UK Business Count data for Oxford (2024), 96% of the city's businesses are micro- (employing up to 9 people – 83.7%) or small- (employing between 10-49 people – 12.3%) businesses.

3.15 Recent increased and sustained high-demand for state-of-the-art research and development (R&D) uses including high-value laboratory and office space, has meant that certain Micro SMEs (including social enterprises, creative and co-operative businesses and

local start-ups) have experienced increasing difficulties finding or affording suitable workspaces or premises in Oxford.

3.16 Where suitable premises for these types of Micro SMEs do exist, they are increasingly coming under pressure for redevelopment, and from rising commercial rents across the city. According to Advanced Oxford's Innovation Engine Update (2023), commercial rents have more than doubled since 2016 when prime office rents were £30/sqft (see Figure 2, page 17 for more details). Commercial rent increases are currently being driven by very strong prime laboratory and office markets. According to Bidwells Oxford Office and Labs Databook (February 2025), prime city centre office rents exceeded £60/sqft in December 2024, while prime rents for larger fitted lab space currently command over £78/sqft. Both prime office and laboratory rents are expected to continue to rise at an annualised growth rate of more than 2% per annum for the next five years.

3.17 The dominant type of employment floorspace being proposed and delivered across the city frequently has a large floorplate, which in combination with the prime commercial rents that can command, excludes many business typologies from accessing it. Opportunities to create new premises to support the growth and development of Micro SMEs more generally in the city are restricted by overall land availability and from pressure to deliver other priority uses (e.g., housing) on any sites that do become available. This lack of suitable and affordable premises and workspaces in the city (both existing and proposed) means that many Micro SMEs are at risk of being priced out of the city.

3.18 This is likely to have a negative impact on innovation opportunities, productivity and the overall diversity of jobs in the city. The resulting loss of economic diversity neither benefits the end-users of the high-value, large floorplate uses that are currently dominating provision, nor local people, who many need to travel further (possibly outside of Oxford) to find suitable and affordable premises and workspace.

Education and skills

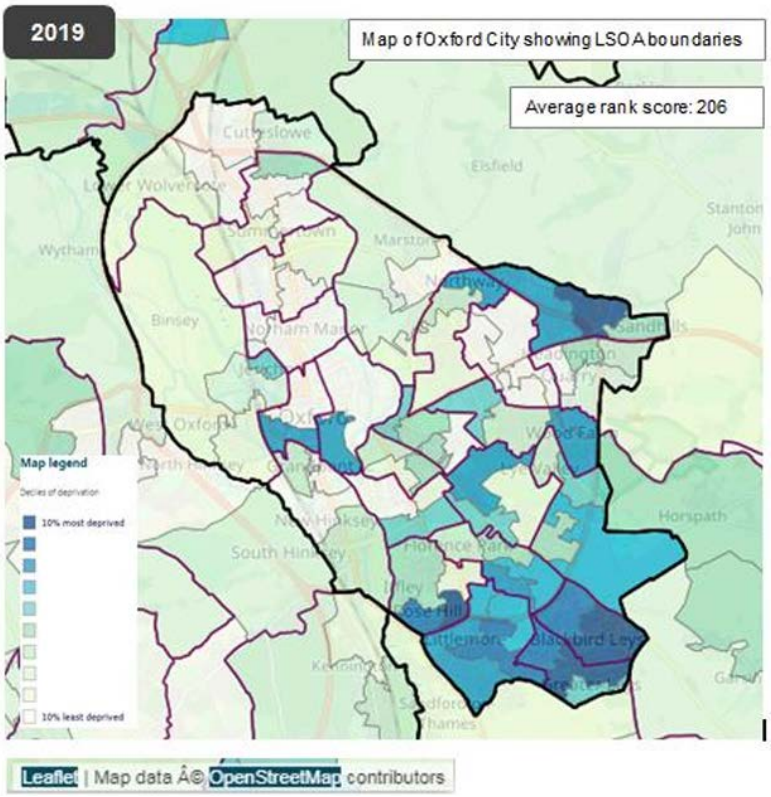
3.19 Oxford can be described as a well-educated city, with a high number of jobs in knowledge-intensive industries attracting workers with higher levels of qualifications. According to the Nomis website, data from the annual population survey (2023), is presented within Oxford's labour market profile. It shows the number of people aged between 16-64 with different levels of qualifications. The highest qualification level on the Nomis website is described as RQF level 4 and above. RQF level 4 is a higher education qualification and, according to the UCAS website, equivalent to the first year of an undergraduate degree, or a Higher National Certificate (HNC). While an RQF level 3 qualification represents A levels or equivalent. The Nomis data shows that 78,200 or 74.3% of Oxford's resident population aged 16-64 has been educated to RQF level 4 and above.

3.20 In 2019, the Government published the latest Indices of Multiple Deprivation. A detailed report – the Indices of Deprivation 2019 Oxford Report is available on the City Council Website. This report sets out that since 2015 children and young people's attainment in

Oxford has been improving, and Oxford has become relatively less deprived. The city is, however, the most deprived of the five Oxfordshire Districts and has one Lower Layer Super Output Area (LSOA) within the 10% most deprived areas nationally. There are 9 areas in total within the city that fall within the 20 per cent most deprived areas nationally. A further 9 areas within the city fall within the 20 per cent least deprived areas nationally. This inequality affects parts of the city more than others.

3.21 The Indices of Multiple Deprivation can be broken down into various categories. The Indices of Deprivation 2019 Oxford Report sets out regarding the Educational Skills and Training Deprivation category - which measures the lack of attainment and skills in the local population - the average score ranking for Oxford was 206 in 2019 compared to 171 in 2015 (the last time the Indices of Deprivation were prepared). This shows Oxford is relatively less deprived in relation to the Educational Skills and Training indicator and that there have been improvements between 2015 and 2019. However, there are still significant disparities across the city and 8 LSOA are within the 10% most deprived nationally. State schools across Oxford, particularly in deprived areas, have under-performed compared to regional and national averages.

Figure 3.1 - Map showing levels of education and skills deprivation in Lower Super Output Areas of Oxford – (higher deprivation is marked by darker blue, lower deprivation in light green)



(Source: The Indices of Deprivation 2019 Oxford Report)

3.22 Further analysis of the Educational Skills and Training indictor (see Figure 3.1) shows it can be broken down into two sub-domains. These two sub-domains are designed to reflect the 'flow' and 'stock' of educational disadvantage within an area respectively. That is, the 'children and young people' sub-domain measures the attainment of qualifications and associated measures ('flow'), while the 'skills' sub-domain measures the lack of qualifications in the resident working-age adult population ('stock'). There are 11 areas in the most deprived 10% nationally for Children and Young People educational attainment compared to only 4 for Adult Skills. Conversely, there are 36 areas that fall within the 10 per cent least deprived nationally for Adult Skills in Oxford compared to 16 for educational attainment for Children and Young People.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 In the absence of a new Local Plan, the importance of the role that Oxford plays to the national economy is likely to continue. This is due to the close ties between research and development (in particular, those associated with the University of Oxford and the Hospitals) and the spin-out companies that are generated because of this close relationship. These innovations through research and development are an essential part of Oxford's economy, both locally and nationally. While it is likely that Oxford's key employment sectors (i.e., education and health) would continue to be linked with innovative research and development, the comprehensive redevelopment and regeneration of certain key sites may prove more difficult.

4.2 The new Local Plan provides an opportunity to ensure that sites allocated for employment uses make the best use of land and contribute to wider plan objectives such as sustainable travel, zero-carbon and enabling the co-ordinated delivery of infrastructure to help mitigate the impact of development. However, without a new plan, there is less certainty that these objectives would be realised in a timely and co-ordinated manner. As such there is a risk that the growth of the city may be prevented or delayed from realising its full potential.

4.3 Given Oxford's global status and international recognition, the city would still be likely to continue to attract direct investment projects. However, external uncertainties created by world events such as the on-going war in Ukraine and the recent introduction of Tariffs by the US, and the impacts of Brexit would be likely to continue to have consequential adverse supply-chain impacts.

4.4 Without a new plan in place, it is likely that the demand for significant additional employment floorspace in the city would continue. This floorspace has recently been coming forward at pace on numerous sites across the city. Indications are that the market remains relatively strong, and that supply has not, and is not currently keeping pace with demand. This mismatch between supply and demand has led to higher rents across the city. With this

significant demand for floorspace, there is a risk that sites allocated for other uses (e.g., housing) may come under pressure to be developed for employment uses.

4.5 There is also a risk that the benefits of economic growth may not be felt by all. For instance, it is less likely that the development of Oxford's economy would be able to deliver benefits to all without policies in the new plan being in place. This is because there could be less opportunity for local people to improve their skills and training. It is also likely that there would be fewer prospects for SMEs and start-ups to find affordable workspace in the city.

Balancing economic uses, housing and supporting infrastructure

4.6 Ensuring economic growth is sustainable requires the delivery of sufficient new homes; the timely delivery of effective infrastructure; alongside the creation of new jobs. Striking a balance between delivering new homes and employment floorspace is a key strategic issue. Oxford is a small compact city. According to the City Council website, the Geography of Oxford statistics page sets out that Oxford has a total area of 46sq km (17.6sq miles). It is well-documented that there is a shortage of land for housing in the city as well strong demand and the associated impacts on affordability. As such, Oxford is one of the most unaffordable places to live in the country. This lack of suitable housing acts as a barrier to further economic growth.

4.7 The balance between the demand for housing and employment land has changed since the previous plan was being drafted. Since then, demand for certain types of employment uses have increased and current indications are that this is likely to continue. The current mismatch between employment land supply and demand is helping to maintain high prime rents for lab and office space both inside and outside the city centre.

4.8 Commercial rents are predicted to continue to rise, over the coming years. Advanced Oxford's Innovation Engine Report 2023 provided data from key local agents on how rent levels have increased in Oxford since 2016 to 2022 and then forecast future rent levels from 2023-2027. Figure 4.1 shows the change in rent levels (per sqft) comparing office with science parks and fitted laboratories.

4.9 Bidwells "Oxford Offices and Labs" Databook (February 2025) confirmed the forecasts for prime office rents in December 2024 as £61/sqft, while providing that actual prime fitted lab rents were slightly higher than forecast having reached £78.50/sqft in December 2024.

4.10 Oxford is currently in a somewhat unusual situation (outside of Central London), where the delivery of certain commercial floorspace typologies appears to be more profitable than other traditionally higher value uses, such as housing. As such maintaining a blanket protection of employment sites may not deliver the required outcome to boost the supply of housing over the course of the plan period. This is because the extant employment strategy (as set out above) seeks to protect the city's existing locally and nationally important

employment sites for further employment uses, as it was written within the context that these sites were under threat from loss to other higher value uses. Considering the current future without the new plan, it is likely that employment sites would continue to receive protection. A new plan provides an opportunity to investigate the potential for new policy interventions that reflect the evolving economic context in which we find ourselves.

Figure 4.1 - showing changes in rent levels (per sqft) comparing city centre office with science parks and fitted laboratories

Year	City Centre Office rents	Science Park rents	Fitted Labs rents
2016	£30.00	£27.00	–
2017	£30.00	£30.00	–
2018	£32.00	£32.00	–
2019	£37.50	£35.00	–
2020	£37.50	£35.00	£55.00
2021	£38.50	£45.00	£60.00
2022	£49.50	£55.00	£75.00
2023(f)	£60.00	£55.00	£76.50
2024(f)	£61.08	£55.99	£77.50
2025(f)	£62.48	£57.28	£78.50
2026(f)	£64.17	£58.82	£79.00
2027(f)	£65.97	£60.47	£79.50

Source: Advanced Oxford Innovation Report 2023

4.11 Employment growth should be appropriately located to take advantage of the city's strengths and help to provide a sustainable distribution of business premises and employment land, to help maintain a range of potential job opportunities throughout the city. Oxford's contribution to the national economy and importance to research and development, e.g., health, makes the city's economy particularly important to protect in these times of on-going uncertainty resulting from wider economic factors including Brexit, the longer-term impacts of Covid-19, and the war in Ukraine.

4.12 It may be necessary to safeguard and protect land to deliver sufficient school places; and to control where educational institutions build more student residences, which could result in the loss of land to other non-residential uses.

Affordable Workspaces

4.13 As set out above, Micro SMEs represent a significant proportion of the city's employment ecosystem. According to UK Business Count data for Oxford (2024), 96% of the city's

businesses are micro- (employing up to 9 people – 83.7%) or small- (employing between 10-49 people – 12.3%) businesses.

4.14 Without the Local Plan 2042, any provision of suitable and affordable workspaces and premises for key Micro SME sectors would rely solely on voluntary provision by developers on a site-by-site basis. It is likely that this would result in the increasing erosion of opportunities for certain Micro SMEs to start-up and remain in the city. This could lead to an increase in the number of Micro SMEs at risk of being priced out of Oxford and the associated negative impacts on innovation opportunities, productivity and a reduction in the overall diversity of jobs in the city.

4.15 Recognising the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity and helping to create the conditions in which all businesses can prosper is one of the objectives of the Local Plan 2042. This objective supports the council's ambition to enable a strong, fair economy – one of the priorities set out in Our Strategy 2024-28. Oxford's Economic Strategy 2032 recognises the importance of affordable workspaces in supporting creative activity, social enterprise, co-operative businesses and local start-ups. It sets out that the creation of affordable workspace in the city would enable a more diverse employment base and give opportunities for evolving sectors (including creative production, low-carbon, technology and digital) to develop and grow.

4.16 The production of the Local Plan 2042 offers the opportunity to consider how the introduction of a policy could support Micro SMEs by enabling the creation and delivery of suitable premises and workspace in the city. The Local Plan 2042 therefore can help to address a failing in the market to deliver suitable premises and/ or workspaces for a significant proportion of the Oxfords' business community.

Economic impacts of the Covid-19 pandemic

4.17 The Local Plan 2036 did not anticipate the Covid-19 pandemic. As such it did not contain any directly relevant policies. In the short-term the pandemic affected people's health, well-being and safety. National lockdowns resulted in the closure of schools and Universities and these closures impacted the quality of children and young people's learning experiences.

4.18 The longer-term economic outlook for Oxford remains positive with on-going investment in key sectors supporting life sciences and the knowledge economy at a variety of locations, such as Oxford North, the West End and Botley Road, and in the south of the city, including at The Oxford Science Park and ARC Oxford. Now looking to the future, Oxford appears set to continue to deliver on its key economic strengths and ambitions.

4.19 However, there are on-going social and economic costs of the pandemic which were presented in research undertaken at University College London (published in November 2024). This research presented the health implications of long-covid using a financial metric

to understand the economic impacts and potential severity of the issue. The researchers calculated the economic burden of long-Covid, was primarily driven by productivity losses, which averaged £931 per patient over the six-month period. As the ONS recognised that around two million people in the UK have long-Covid the costs associated with days lost could potentially add up to £20billion a year.

Future role of the city centre, office space and home-based working

4.20 Oxford's city and district centres continue to play an important but evolving role in the city's economy. Encouraging people into the city's network of centres will help to preserve and enhance their vitality and viability. A mix of uses, alongside retail, including employment, community uses, residential and student accommodation is likely to help re-vitalise the city's centres and ensure that these areas are re-energised by activity.

4.21 Pressure on city's office stock remains driven by the accelerated growth in science and technology employment. This sector typically takes up more floor space than other sectors – but evidence suggests that the science sector can adapt to all property types. Existing industrial and retail units can be a more flexible and cost-effective solution for a low-cost fit-out. Recent redevelopments along the Botley Road are an example of this where some of the older retail units have been repurposed as flexible lab-enabled office space offering a flexible mix of office and R&D workspaces.

4.22 There is also potential for repurposing vacant spaces within the city and district centres. This brings social benefits in terms of increasing activity and footfall within the city and district centres as well as helping to drive innovation and economic growth. This approach may benefit vacant spaces in the city and district centres. In the city centre, regular surveys are undertaken of vacant units. The most recent survey data (2024) showed that out of 383 surveyed units 75 were vacant (19.5%). In 2023, out of 383 surveyed units, 77 were vacant (20.1%). In 2022, out of 397 surveyed units, 96 were vacant (24.1%). Redevelopment opportunities do account for some vacancies however the percentages broadly align with a national post-Covid picture that shows higher city centre vacancy rates than were experienced before the pandemic.

Retention and recruitment of staff

4.23 One of the biggest challenges Oxford faces arises from a mismatch between new homes and jobs. The city's growing economy and associated jobs growth in key sectors such as R&D and labs is resulting in an increased pressure on the availability of housing and services (and on Oxford's already constrained transport network). This homes/ jobs mismatch has also led to affordability and housing issues in the city. These issues represent the concerns most consistently raised by Oxford's businesses in relation to staff retention and recruitment.

4.24 As Oxford is one of the most unaffordable cities in the UK, housing affordability issues also result in over-crowding issues and poor health outcomes. Opportunities to build sufficient new homes within Oxford itself to address this mismatch are limited by the city's size (Oxford is only 46sqm/ 17.6sq miles); its natural and heritage assets (including over 1,500 listed buildings); flood plain; and Green Belt (which covers more than a quarter of the city's total area).

4.25 The mismatch between homes and jobs has resulted in Oxford having the highest net inflow of commuting workers in the Oxfordshire region. The Office for National Statistics has produced an online visualisation tool for origin-destination data entitled Visualising People Flows available on the Office for National Statistics website. This shows that for the Census 2021, there were 28,342 workers recorded as commuting into Oxford out of a total of 92,047 workers aged 16 and over.

4.26 The Census 2021 figures reflect working from home patterns under restrictions imposed by the Covid pandemic. As such, the data does need to be treated with a degree of caution. However, a direct comparison with the Census 2011 data shows a reduction in in-commuting since 2011. The 2011 Census recorded 45,852 workers commuting into Oxford for work out of a total of 88,258 workers living and working in the city. Besides the obvious environmental pressures, commuting generates its own costs which can be significant particularly when they involve long journeys. These are often borne directly by the employee, particularly if they are on temporary or agency-based contracts.

4.27 Oxford City Council's website provides some additional transport statistics from the 2021 Census. This data shows that within Oxford, the most popular mode of transport was active travel (walk or cycle) with 38.8% of commuters choosing this method, while 38.2% of commuters arrived by car or van. This is significantly lower than the 2011 Census figure of 66.8%.

4.28 Finding a way to assist employers with recruitment and retention problems can support the Local Plan objectives in three ways: economically (helping productivity of employers and local investment); through housing (including by providing affordable housing); and sustainability (giving people the opportunity to live closer to place for work; through increased energy efficiency measures; and by through the associated reductions in emissions).

5. Options for Local Plan 2042 policies

5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 should include a set of policies to address employment land needs and that support the inclusive economy. This will not only be important for delivering upon the Local Plan 2042 objective of supporting economic growth in key sectors of science and technology, but also for helping to create opportunities for everyone in the city to access to

employment. The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Addressing employment land needs
- Making the best use of employment sites
- Allowing housing on employment sites
- Location of new employment uses
- Warehousing and Storage uses
- Community Employment and Procurement Plans
- Affordable Workspaces
- Visitor Economy

5.2 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.3 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report).

5.4 Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 004a-1:(draft Policy E1) Addressing employment land needs

5.5 *The city's current employment strategy for meeting identified employment land needs (as set out in the Oxford Local Plan 2036) sought to protect the city's most important existing employment sites and supported the development of additional land for employment uses as part of a mixed-use strategic allocation at the city's northern gateway. Now known as Oxford North, this site is delivering 87,300sqm of commercial floorspace to support the knowledge economy, alongside residential development, at the northern edge of the city. Previous economic evidence showed that Oxford's continued policy of economic restraint was appropriate.*

5.6 *Post-pandemic, the city has seen increasing demand for high-value employment floorspace (such as R&D, lab-space and flexible lab-enabled office accommodation). Oxford's employment land supply is in a strong position with a significant amount of high-value, high-demand floorspace permitted in the last five years. The majority of this permitted floorspace is coming forward at pace and likely to be delivered in the early part of the plan period. This strong supply position aligns with the established and escalating demand for this type of floorspace. The employment strategy option set considers several approaches as to how Oxford could address its identified employment land needs for the plan period.*

Table 5.1 - Policy options set 004a-1: Employment Strategy – how the plan addresses employment land needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full within the city, recognising that existing sites in lawful commercial use cannot be changed from that use against the landowner's will, so intensification on those sites is appropriate.	It is not possible to truly 'balance' housing and jobs, because it is not realistic to assume the majority of people will live their lives confined by Oxford's boundaries, there are benefits to an overall approach focusing on allocating new sites for housing and focusing on an approach of intensification and modernisation at existing employment sites (as opposed to allocating new employment sites through the Local Plan) in the city at the current	This approach could mean that some employment needs might need to be met outside the city. If this was the case a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.

	time. This would help reduce problems created by significant in-commuting. Also, employers have reported significant difficulties attracting and retaining staff because of a lack of housing and its expense. To help current employers maintain their success may require a focus on new site allocations for housing and potentially allowing elements of existing employment sites to be converted to housing.	
Option B Focus employment strategy on meeting all identified employment land needs within Oxford's boundary. Do not seek to prioritise other uses if employment need cannot be met. Actively investigate ways to meet employment land needs within the city through providing appropriately located employment land/ new sites (if required).	Oxford's economy makes an important contribution locally, regionally and nationally, and this approach acknowledges that strength and focuses on it. Meeting our identified employment land needs within the city boundary would mean that there would be no cross-boundary issues for employment land. A wide range of jobs would be supported under this approach. This is because the Plan would actively seek to meet all employment land needs (not just focusing on Oxford's key strengths but	This strategy could result in schemes for employment land being promoted across the city. Such schemes could come forward at the expense of other priority uses (e.g., housing). A shortage of housing in the city, and its expense, has been previously reported by employers as one of the key reasons that they have for having difficulties attracting and retaining staff. Depending on the level of need identified, this approach could have adverse impacts on housing delivery, which may have cross-boundary implications requiring a strategy to be agreed through joint working.

	This would allow a wide variety of entry points into the labour market, helping to overcome issues such as labour market exclusion, both actual and perceived.	If that does not happen, there will not be a strategic approach to meeting those needs. There are also implications for transport and travel. This option could potentially result in increased in-commuting.
Option C Let the market decide the most appropriate employment land uses to deliver and actively support new locations for employment development if there is market demand for these spaces. Rely on the Framework (NPPF) and other policies in the plan to determine applications for employment land in the city.	Oxford's economy makes an important contribution locally, regionally and nationally, and this approach acknowledges these economic strengths and would focus on them by supporting key sectors (such as laboratories/ flexible lab-enabled office accommodation). The office/ lab market is generally considered to be strong and resilient in Oxford. Current market conditions support delivery across the city. A market-led approach would provide flexibility to changing market conditions which could respond quickly and enable other land uses to be delivered (e.g., housing) across the city if market conditions were to change.	This approach could result in schemes for employment land being promoted across the city. There is a risk that schemes could come forward at the expense of other priority uses (e.g., housing). As such, this approach could have potential cross-boundary implications for housing. It is likely that lower-value, lower density employment-generating land uses (e.g., industrial/ warehousing) would not be able to afford to be in Oxford. As such, these uses may not be brought forward within the city. It is likely that these uses would be delivered outside the city boundary, which may have cross-boundary implications requiring a strategy to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** Unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options have already been considered holistically as part of the wider growth strategy alternatives appraisal. While there are some minor negative effects likely on the SA objective for green spaces resulting from Option B, and potential uncertainties around whether homes or employment land would be delivered resulting from Option C, any likely effects are not considered significant.

Policy options set 004a-2 (draft Policy E1): Making the best use of employment sites

5.7 *Traditionally, Oxford has protected its employment sites to prevent losses to higher value uses. In the past such uses have been residential in nature. More recently, higher value land uses in the city have been related to research and development and the importance of delivery of these uses has been prioritised nationally through incentives and linkages to increases in productivity. Oxford's economic strategy encourages the city to build on its key strengths in life sciences, research and development, while aiming to meet the city's overall employment needs in a way that enables a diverse economy.*

5.8 *Given the high demand for high value floorspace in the city, well-performing employment sites that support the city's local economy or provide important local services may come under pressure for redevelopment. Given the permissive changes outlined within Use Class E of the Use Classes order, there may be limited protection that can be afforded to these sites through the planning system. However, there is an opportunity to provide protection for locally important employment sites outside of Use Class E (i.e., those in Use Class B2).*

Table 5.2 - Policy options set 004a-2: Making the best use of employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – existing OLP2036 approach	Continuing to provide protection for the city's most important employment sites is	The continuation of this policy approach could result in a lack of support for the

Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Protect the city's most important employment sites, which are named in the plan, from loss to other uses. Allow the loss of poorly performing sites to other priority uses e.g., housing).	likely to continue to support a focus that aligns with Oxford's key strengths and support the local economy. Has the potential to support the delivery of sustainable transport solutions as intensification opportunities are at known locations. This approach allows the loss of poorly performing employment sites to other uses (e.g., housing). Supporting housing delivery can help to reduce barriers to economic growth.	some of the city's Category 3 employment sites. Although poorly performing in economic terms, some of these sites can provide a social value by adding economic variety, diversity and low-cost/ affordable workspaces which can benefit Oxford's economy.
Option B Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Outside the city and district centres, protect a range of important employment sites that support the local and regional/ national economy. Include criteria-based approach to the loss of employment sites. Take a flexible approach to the continued use of existing employment sites in highly sustainable locations (i.e., city and district centres). Consider inclusion of criteria to support decision-making process.	Continuing to provide protection for the majority of the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This can help maintain a range of employment opportunities are available. Taking a flexible approach to the continued of employment sites in sustainable locations could enable the delivery of other appropriate uses (e.g., housing/ other town centre uses) in some of the city's most sustainable locations.	Not protecting employment sites inside the city and district centres would let the market decide on the most appropriate uses in these locations. This could potentially lead to uncertainty and potential difficulties in planning for and meeting employment land needs in these areas.

Option C Rely solely on national planning policy/ other policies in the plan	This option would provide flexibility for landowners/ developers to respond quickly to market conditions and is likely to support the continued growth of high-value, high-demand uses such as R&D.	Important sites that contribute to the city's economy could be lost as this approach would not actively protect employment sites. The market would ultimately decide on the most appropriate employment uses for the city. This could result in more high-value, high-demand employment uses being delivered and would ultimately lead to uncertainty and increased difficulties in planning to meet the city's identified employment land needs.
Option D Protect all employment sites to support meeting identified employment land needs. Do not support the loss of employment uses on any existing employment site. Encourage intensification and modernisation of employment sites across the network.	Continuing to provide protection for the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This would help to deliver a broader selection of employment sectors than those associated and aligned with Oxford's key strengths.	As all employment sites would benefit from protection under this option, there would be no scope for their loss to other uses other than through permitted development. Including protection for all existing employment sites could result in employment opportunities coming forward on poorly performing or poorly located employment sites which could otherwise be redeveloped for other uses (e.g., housing)

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Options a) - d)

High-level screening conclusion? - the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? - No

Rationale: No – all options align broadly with national policy. The effects of Option A on the SA Objectives are likely to be broadly neutral as this option takes forward the current Local Plan 2036 approach. Option B, while similar to option A could enable a wider range of uses, including priority uses such as residential development to come forward in sustainable locations such as the city and district centres. This could have minor positive impacts on certain SA objectives (e.g., housing), but would ultimately depend on the implementation of specific sites based on landowner interests. Option C could have minor positive or negative impacts on certain objectives such as different aspects of economic growth and housing. This option would ultimately lead to the determination of development proposals being guided solely by national policy which may cause increased uncertainty in the decision-making process.

Finally, Option D would broadly strengthen the protection of all employment sites across the city which could have minor negative impacts on housing delivery.

Policy options set 004a-3 (draft Policy E1) - Housing on Employment sites

5.9 *Given Oxford's long-standing housing availability and affordability issues, which have often been cited by employers as key barriers to attracting and retaining staff, we are considering the introduction of a permissive approach to housing delivery across the city's employment site network. Delivering new homes in Oxford is an important aspect of addressing these known barriers to economic growth.*

5.10 *It is important to ensure that any approach that supports new homes on existing employment sites does not need lead to situation where it undermines the ability of sites to deliver employment floorspace required to meet the Oxford's identified employment land needs*

Table 5.3 - Policy options set 004-a3 - Housing on Employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – existing OLP2036 approach Does not specifically allow an element of housing delivery on existing employment sites.	If Oxford was unable to meet its identified employment land needs in the city, it would be important to ensure that existing employment sites were not further diversified for other uses.	Not all landowners/ developers of employment sites would necessarily want to bring forward housing on their sites, however some large key institutions representing significant employers in the city (e.g., hospitals – 19.8% of the city's workforce was employed in the health sector in 2023 according to Nomis). This approach could undermine efforts to house hospital staff on their own sites, which enables the recruitment and retention of key workers, some of whom would otherwise struggle to live in the city.
Option B Allow an element of housing delivery on existing employment sites (if other policy requirements are met (e.g., around flood risk).	Locating housing and jobs in close proximity to one another can bring benefits for local services and facilities. It also has the potential to deliver more homes within Oxford city. This may help Oxford to meet its housing need and provides flexibility to respond to changing circumstances and values over time (even if owners/ developers are not interested in delivering housing to their sites at the present time).	It will be important to ensure that any housing that does come forward on the city's employment site network does not prejudice Oxford's ability to meet its identified employment land needs otherwise a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.

	Certain sites, such as Old Road Campus (where important research linked to science and innovation takes place), and the hospitals (which are important for health care treatment and research), need to be supported to both continue to contribute to the economy, and where appropriate, to investigate opportunities to house key workers who may otherwise struggle to remain in the city.	It will be important to ensure that, if housing is allowed to be delivered (through a permissive approach) across the city's employment site network, that it is not to the detriment of the important contribution that Oxford's economy makes locally, regionally and nationally.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects **Screened in for detailed appraisal? -** No **Rationale**: These options have been assessed within the wider context of the growth strategy alternatives appraisal. They do not require further detailed appraisal as they are only likely to have minor positive or negative neutral or negligible effects. Option A is likely to have broadly neutral effects on all SA objectives as it would maintain the current Local Plan 2036 policy approach. Option B could have some minor positive effects on SA objectives such as housing and transport-related objectives as supporting additional homes in the city across all employment sites could help to address housing and commuting issues however the amount of new homes that could be delivered would likely depend on implementation as it would not be possible to mandate new homes without landowner agreement.

Policy options set 004a-4 (draft Policy E1): Location of New Employment Uses

5.11 *Given Oxford's limited land availability and the importance of delivering other priority uses in the city (in particular, housing), it is important to ensure that new employment uses are supported in appropriate locations across the city.*

5.12 *There are a number of areas of the city where business and innovation sectors are clustered. These sites play an important role individually, and collectively they contribute to economic growth nationally, regionally and to the local economy. These include the Oxford Science Park; ARC Oxford (formerly Business Park); Old Road Campus; the Hospital sites; Oxford Science Area and Keble Road; the Radcliffe Observatory Quarter; Oxford North (which is now being built out); and the West End regeneration area.*

Table 5.4 - Policy option set 004a-4: Location of New Employment Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Support new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. Do not allow any new employment-generating uses outside of these locations (i.e., do not allow the loss of existing housing sites to employment-generating outside the city and district centres). Allow new employment uses in the city and district centres (subject to their role and function).	This option would retain the geographic focus of locating new employment-generating uses in existing centres and specified employment locations. Continuing to focus new employment-generating uses in existing employment locations can bring connectivity and infrastructure benefits. Restricting new employment-generating uses to existing employment sites can support housing delivery in the city by limiting pressure to bring forward housing sites for high-value, high demand employment uses (e.g., R&D)	This approach would continue to support employment-generating uses within existing sites only. This could result in more development being pushed towards the southern edge of the city which includes the locally important Garsington Road cluster as well as key city employers such as the Science Park, ARC Business Park, Unipart site and Mini Plant Oxford. While significant strides have been made towards re-opening the Cowley Branch Line to passenger trains, this area is currently poorly served by public transport, and active travel routes. If by restricting the locations where new employment-generating uses are

		acceptable in the city, this results in constraints to its future supply, this could increase the demand for high-value employment uses. This could result in pressure to redevelop lower-value employment sites to try and keep up with the demand for higher value uses.
Option B As Option A (above) but rather than restricting new employment-generating uses to existing sites, instead allow new employment uses, in a limited number of suitable specified locations (e.g., adjacent to exiting employment sites) Depending on the location, there may be merit in requiring certain sites to bring forward a mixed-use expansion including residential).	As above except this approach would enable key clusters to expand and continue to support Oxford in building on its economic strengths. If Oxford is unable to meet identified employment land needs in the city, this approach may provide a pragmatic way forward which could help support the delivery of additional housing and employment land.	Given Oxford's small size and limited opportunities for new development, actively supporting the creation of additional employment land in the city could negatively impact the delivery of other uses including housing and much-needed affordable housing.
Option C Rely solely on national policy and other policies in the plan (e.g. hierarchy of centres) to determine proposals for new employment floorspace in the city.	Recent changes to the NPPF strengthen support for economic growth and specifically mention laboratories as a key sector to stimulate the economy. This market-driven option is likely to support the delivery of high-value, high demand uses (e.g., R&D/ lab). This is an important sector, which would support national economic objectives.	Outside of the city and district centres, where Class E employment uses would be supported as "town centre uses", the plan would not provide any policy guidance on the location of new employment-generating uses. As a small, compact and constrained city, although Oxford is an inherently sustainable location for development and there could be increased pressure to deliver employment-generating uses in the city. However, this increased

		pressure would be likely to be limited to unallocated sites that would need to comply with national policy. An absence of local policy in this instance could potentially increase uncertainty over where new employment uses could be delivered, if the strength of the commercial market was to soften in relation to the housing market over the plan period.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. **Screened in for detailed appraisal? -** No **Rationale:** These options have been considered more widely within the context of the growth strategy alternatives appraisal. Detailed appraisal of these options is not required. Options A and B are similar. The effects of Option A are likely to be neutral against all SA objectives as this option would carry forward the current (LP2036) approach. Option B could have potential minor negative effects depending on the precise location of any expansion and factors such as the environmental quality of any land taken for development, but the precise nature of any effects undertaken at this stage would depend on implementation and would ultimately require more detailed site-specific assessment, which would be subject to a separate appraisal against the SA Framework. Option C would be likely to result in uncertainty in the decision-making process which could result in some minor negative effects on certain SA objectives (e.g., certain aspects of economic growth could be weakened but it is unlikely this objective would be significantly impacted upon by these locational uncertainties. It could ultimately involve more resources at the development

management stage as each site would need to be assessed on a case-by-case basis to work out whether the location was suitable for employment uses.

Policy options set 004b (draft Policy E2) Warehousing and Storage Uses

5.13 *New large scale B8 uses are usually low-density and do not generally make an intensive land-use. As a small, compact and constrained city, there are numerous competing pressures for land in Oxford. This means that there is often a need to make the best, or most efficient use of any land that comes available. As such, new B8 uses are not always the most appropriate use for land within the city. Freight consolidation can support Oxford's transition to a zero-carbon future. One of the actions highlighted in the Zero Carbon Oxford Partnership roadmap and action plan was to pilot freight consolidation around the edge of Oxford. This is to help deliver a successful transition to Zero Carbon living. It is important that the Local Plan 2042 does not prevent this taking place.*

Table 5.5 - Policy options set 004b: Warehousing and Storage Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – Existing approach New B8 uses on sites not already lawful use are only allowed where the use is essential to the operation of a Cat 1 site Loss of B8 uses generally supported unless B8 use is essential for the ongoing support of a Cat 1 site.	This option would prioritise employment land in the city for more efficient and intensive land uses. By restricting B8 uses to support the operational requirements of the city's most important (Category 1) employment sites ensures that new B8 uses are delivered in way that supports and enables the continued or enhanced operation of employment sites with clear links to wider economic aims as set out in national policy.	Limiting B8 uses to Category 1 sites can preclude the legitimate expansion needs of suitably located local businesses that make a positive contribution to the economy by providing jobs to local people.

Option B Where new B8 uses are allowed would be widened to enable support for the continued operation of locally recognised employment sites and those that support the national economy. Loss of B8 uses would generally be supported unless the B8 use is essential for the ongoing support of sites on which new B8 uses are allowed.	This option would support a wider range of employment sites to deliver B8 uses which could enable local businesses to expand and remain in Oxford, which can provide key services and support local jobs. This would align with national economic objectives relating to the continued growth of existing employment sites.	This approach would reduce the priority given to other uses that support the local, regional and national economy. It could bring B8, which often generates transport by HGV and LGV, into unsuitable areas. It allows this use which does not make best use of limited land.
Option C (in combination with option a) or b)) Introduce a specific exemption to enable the pilot of a suitably located freight consolidation centre	This option would enable LGV/ HGV freight to be moved to electric delivery vehicles, e-bikes and cargo-bikes at the edge of the city, rather than petrol and diesel LGVs and HGVs moving into residential areas and the city centre for deliveries. This would help to deliver City Council and partners' zero carbon partnership aims to decarbonise last mile deliveries in the city.	Any relaxation would need to be carefully managed to ensure it does not open up the potential for significant new storage facilities that do not make efficient use of land and that may not be well located in terms of the road network and avoiding congestion.
Option D Further restrict new B8 uses so they are generally not supported at all.	Further restriction of this inefficient land use could provide more land for priority uses.	Restricting B8 uses further in the city may result in potential difficulties for employment sites that rely on some B8 for their continued operation.
Option E		

Rely solely on national policy and other policies in the plan to assess applications for B8 uses in the city.	Could see an increase of B8 uses on a range of sites in the city, providing services and jobs.	Would neither actively restrict nor promote B8 uses in the city and would allow market forces to dictate the demand for B8 uses. This approach could reduce the priority given to other uses that support the local, regional and national economy.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b (in combination with c) or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. **Screened in for detailed appraisal? -** No **Rationale:** Two of the options (Option A and B) seek to restrict the location of new B8 uses to certain existing employment sites, while one option (Option D) does not seek to support new B8 uses at all in the city. Option D (further restriction) is likely to have a minor negative impact the SA objective for economic growth as not supporting new B8 uses at all in the city may result in difficulties for sites that rely on an element of B8 for their continued operation. While not having a policy could lead to uncertainties about future delivery of B8 uses on sites where they may be needed, this is unlikely to have a significant effect. Option C is a supplementary option and is considered in-combination with Options A and B. This option would be likely to deliver minor positive benefits which wider carbon reduction objectives. Option A would have a likely minor negative effect on economic growth as far as local supporting locally recognised employment sites, but this would be balanced out by a likely minor positive effect supporting nationally important sites and significant local employers. Option B (in combination with Option C) would be likely to have a minor positive effect on economic growth as it would support the widest selection of employment sites and could support existing businesses to expand, while remaining in Oxford. This can support local jobs and services.

Policy options set 004c (draft Policy E3): Community Employment and Procurement Plans

5.14 *Community Employment and Procurement Plans (CEPPs) have an important role to play in securing opportunities that arise from new development. In the operational phase of development, agreements to secure a proportion of the longer-term workforce or*

supply chain locally or commitments to community education and outreach can ensure ongoing benefits. In the construction phase they can provide opportunities for local people to be employed in the building industry (e.g. through apprenticeships/ training/ making links to local schools and colleges) or secure commitment from the developer to procuring material and labour locally. Another option is to commit to paying employees the Oxford Living Wage and only using contractors who pay this higher level than the National Living Wage.

Table 5.6 - Policy options set 004c: Community Employment and Procurement Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requiring applicants to submit a Community Employment and Procurement Plans alongside major development proposals, which also looks at the potential for engagement with training and education.	Would introduce a partnership mechanism for securing community benefits from major development projects. Would help deliver the aims of the Economic Strategy and implement part of the linked Action Plan.	This could be seen as an unnecessary or onerous requirement of developers.
Option B Encourage applicants to submit a Community Employment and Procurement Plans alongside all major development proposals but do not make this a policy requirement.	A voluntary approach would be flexible but applicants could still be encouraged to embark on CEPPs to provide opportunities for local people as they saw fit.	The voluntary approach is limited in scope and potential contribution that could be made. Measures set out in TAN are only presented as advice and guidance, no obligation to implement and no mechanism to monitor or enforce.
Option C Do not encourage or require applicants to submit a Community Employment and Procurement Plans.	Increased flexibility for applicants.	Removing encouragement from supporting text of plan may actively discourage applicants to submit Community Employment and Procurement Plans.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective. Unlikely to have significant effects.

Screened in for detailed appraisal? - No

Rationale:
The options most directly influence criterion 12. Economic growth, by providing for greater amounts of employment opportunities within the city. They are possible impacts on other criteria in the SA framework indirectly where these have a relationship to economic growth (e.g., accessible services/facilities, inequalities). Option a would be likely to have a minor positive impact by providing access to education and employment opportunities to local people. Option b as a continuation of the status quo, is likely to have neutral impact, whereas option c would be a retrograde step as the plan would not actively encourage skills and training opportunities. Overall, this option set is unlikely to have significant effects and therefore can be screened out from further assessment.

550

Policy options set 004d (draft Policy E4) – Affordable workspaces

5.15 *Oxford's economic successes have brought with them unforeseen challenges. Post-pandemic, the city has seen significant and increasing demand for high value employment land uses (such as R&D and flexible lab-enabled office development). This relatively new and high demand for these high-value land uses, coupled with a constrained land supply and a need to deliver other priority uses such as new homes in the city, has resulted in increased pressure to redevelop lower value premises across the city's employment site network.*

5.16 *A need for affordable workspaces to support certain identified sectors of Micro SMEs has been created by a combination of rising rents, high demand for larger-floorplate, high-value land uses, a lack of physical space in the city, and increasing land values have resulted in a failure in the market to provide suitable accommodation for a range of businesses and enterprises that can contribute to and support the economic diversity of an area. Oxford City Council's Economic Strategy highlights some of the key sectors that require these spaces. It also sets out the importance of providing affordable workspaces for the 'inclusive economy' i.e., to support creative activity, social enterprise, co-operative businesses and local start-ups in the city. The following options were considered*

Table 5.7 - Policy options set 004d: Affordable workspaces

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requirement to deliver affordable workspaces on larger commercial development sites (in use Class E)	Likely to be the approach which would secure the most affordable workspace and help facilitate an inclusive and diverse economy.	Depending on the requirements of any future policy, this approach may be considered onerous. It will need to be backed up by appropriate viability evidence.
Option B Introduce text in the local plan encouraging employers to deliver affordable workspace in the city.	Allows the market flexibility to determine the type of employment space provided.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city. Not providing support for affordable workspaces in the

		plan would not help to secure and deliver these types of spaces. As such the wider benefits from economic growth linked to Oxford's key sectors in science and innovation, would not be realised by all the city's residents.
Option C Do not incorporate the concept of affordable workspace in the Local Plan.	Leave the market to determine the type and amount of employment space to be provided across the city.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city and therefore to help secure the benefits of a strong, fair and inclusive economy.

552

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** While the policy may have economic and social value benefits, in land-use terms, development is happening anyway and is likely to be needed to support the delivery of affordable workspace on qualifying sites.

Policy options set 004e-1 (draft Policy E5): New Tourism and Short Stay Accommodation

5.17 *Oxford's visitor economy makes an important contribution to jobs in the city. It is therefore important to support new and existing tourism and short stay accommodation in appropriate locations so that visitors to the city are encouraged to spend more time (overnight stays) and increase spend to support the local economy. Longer stays can reduce the numbers of "day-trippers" as high volumes of these types of visitors adversely impact traffic congestion and associated air quality issues.*

5.18 *These final option sets look at locations for new tourism and short stay accommodation; and whether or not to include planning policy in relation to existing tourism or short-stay accommodation. Each option set is looked at in turn.*

Table 5.8 - Policy options set 004e-1: New Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Allow new sites for tourism and other short-stay accommodation in the city and district centres, on allocated sites and on Oxford's main arterial roads only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations. Likely to benefit Oxford's economy through supporting a higher percentage of Oxford's visitors to stay overnight. Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	Potential for increases in traffic along arterial roads and potential risk that this use could become dominant in locations supported by the policy.
Option B Allow new short stay accommodation in the city and district centres, and on allocated sites only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations and provide control over which sites outside of these areas were appropriate to deliver short-stay accommodation.	May increase pressure for town centre uses in city and district centres and reduce variety of uses in these locations. Would reduce the number of locations where tourist accommodation is deemed

	Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	appropriate, and it may not be possible to meet needs.
Option C Support new short stay accommodation anywhere in Oxford.	Would increase potential locations where short stay accommodation is deemed appropriate. This is likely to encourage overnight stays in Oxford which is likely to have positive benefits for the city's visitor economy.	Allowing short-stay accommodation across Oxford could result in sites being developed that are poorly located in terms of potential traffic impacts or could have negative impacts on residential amenity, for example. Could result in more accommodation being provided where other priority uses (e.g., housing) would have been appropriate.
Option D Outside of the city and district centres, seek to resist new short-stay accommodation anywhere in the city.	May support the delivery of other priority uses (e.g., housing) in locations outside the city and district centres	May increase competition for land for tourism and short stay accommodation with other main town centre uses within the city and district centres. This could lead to a less diverse offer of tourism and short stay accommodation as higher land values in some centres would lead to the delivery of higher value accommodation (e.g., hotels) only.
Option E Do not include a policy on new short stay accommodation in the city. Instead rely on	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such

national policy to delivery new short stay accommodation in the city.	impacts of this option are essentially very similar to Option B (above).	impacts of this option are essentially very similar to Option B (above). Short-stay accommodation is not generally considered a suitable use outside of the city and district centres unless identified need shows otherwise. This approach may lead to uncertainty regarding where new accommodation would be supported and could lead to applications outside of sustainable accessible locations.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or d or e **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option A maintains the current locational approach supporting new tourism and short stay accommodation in a variety of accessible locations across the city. This would be likely to result in a neutral effect on all the Sustainability Objectives. Option B proposes a more limited selection of locations. By reducing the acceptable locations for new tourism and short stay accommodation it could have a minor negative effect on the visitor economy although the overall impact on the SA objective for economic development would be likely to remain positive. Option C would enable new tourism and short stay accommodation opportunities to be delivered across the city. This option could result in this type of accommodation being delivered in less accessible locations which could have minor negative impacts on local amenity and transport-related objectives. Option D is the most restrictive option and would only support new tourism and short stay accommodation in the city and district centres. This would be likely to have minor positive effects associated with housing outside of these locations, but it would increase competition within the city and district centres where land values may be higher, which may result in a focus on high-value accommodation. This may not achieve wider aims associated with the visitor economy of encouraging longer stays and increased spend in the city. Finally, not having a policy

could lead to uncertainty over locations where new tourism and visitor accommodation would be supported. This may result in competition with other priority uses.

556

Policy options set 004e-2 (draft Policy E5): Existing Tourism and Short Stay accommodation

Table 5.9 - Policy options set 004e-2: Existing Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Do not include a policy protecting existing short-stay accommodation in the city and instead rely on other policies in the plan and national planning policies.	This option would mean that Oxford is reliant solely on market forces to protect its existing stock of short stay accommodation. Whilst providing flexibility for developers, it would not necessarily help the city to achieve its wider tourism aims and objectives.	Could provide uncertainty for existing short-stay accommodation owners and occupiers. May not effectively promote Oxford's visitor economy by encouraging more overnight visitation.
Option B Allow the expansion of existing short-stay accommodation providing certain criteria are met. Seek to protect existing accommodation and allow loss only if specified criteria are met (i.e., by providing viability evidence or if the location is not one where new short stay accommodation would be allowed).	Likely to provide support for Oxford's visitor economy by protecting existing facilities and allowing their appropriate expansion. It is important to seek to prevent the loss of existing visitor accommodation to other uses because tourism is an important contributor to the day and evening economy of the city.	Inclusion of criteria which must be met before a loss will be permitted (such as viability, marketing etc.) would ensure that existing sites that function poorly are not prevented from being redeveloped.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

Rationale: As these are existing sites, from a sustainability perspective whether to include policy guidance supporting appropriate small-scale redevelopment or changes or use, or not, is unlikely to result in significant effects on the any of the sustainability objectives.

558

6. Conclusions including key sustainability issues

6.1 Growth is likely to continue in the key sectors of Oxford's economy – e.g. education, research and development and healthcare. However, some of the key corporate objectives set out in the City's Economic Strategy in 2022-32, in particular those in relating to building an 'inclusive economy' are likely to need policy interventions if they are to be achieved successfully. Continuing with the current policy framework is unlikely to help achieve these aims. As such, the economic prosperity brought to the city by increasing jobs in Oxford's key sectors is unlikely to be shared fully with local residents, which would help to reduce inequalities and poverty. This is because the jobs that could potentially arise from this growth may be inaccessible to many local people if the training and skills gap is not addressed.

6.2 The extant Local Plan 2042 seeks to supported good growth by protecting key employment sites either for their existing use or for their redevelopment for continued employment uses through modernisation and intensification. This was because of their importance to the local and national economy and due to the risk of their loss to other uses. Given the high demand for certain types of employment (e.g., office/ R&D) floorspace in the city, the Oxford Local Plan 2042 build on the strengths of the extant approach and has developed options and policies involving employment land, and supporting Micro SMEs as well as looking to provide access to jobs, training and apprenticeships.

Key sustainability issues for the Local Plan to address:

- Employment in the city remains high and likely to continue growing;
- The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing. Some employers have reported difficulties attracting and retaining staff because of these issues;
- It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs;
- The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites;
- A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner;
- Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D;
- Micro SMEs make up a significant proportion of the businesses in Oxford and support innovation opportunities, productivity and while contributing to economic diversity.

Certain sectors are struggling to find suitable affordable premises (existing and proposed) in the city.

- Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people;
- State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages;
- Due to changes in shopping habits, (e.g., the increase in on-line retail), the city and district centres need to remain the focal point of the city. Uses other than retail can increase footfall and support vitality and vibrancy in these inherently accessible parts of Oxford. Non-retail opportunities emerging in city's centres include co-working spaces, R&D and more;
- Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city;
- Small scale brownfield development across the city may increase pressure on existing school places and will not in itself provide new school sites.

Preferred approaches for the Local Plan 2042

6.3 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address which relate to the economy (including the visitor economy), economic development, and supporting a range of jobs and training opportunities. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Employment Strategy – Draft Policy E1

6.4 Draft Policy E1 combines the preferred approaches from four options sets. Each options set considers a discrete element of the policy. The four options sets are as follows:

- 004a-1: Addressing employment land needs
- 004a-2: Making the best use of employment sites
- 004a-3: Housing on Employment sites
- 004a-4: Location of New Employment Uses

6.5 The preferred approach for each option set is set out below:

004a-1: Addressing employment land needs

6.6 The preferred approach for the Local Plan 2042 policy is to take forward **option A**. This is because it was considered important to align the employment strategy with the plan's strategic focus to prioritise housing delivery (which supports the economy by helping to

address long-standing barriers to economic growth relating to housing supply and associated affordability issues in the city). This option would enable employment development to take place on existing sites which would help meet identified employment land need while also supporting the delivery of much needed housing.

004a: Making the best use of employment sites

6.7 The preferred approach for the Local Plan 2042 policy is to take forward **option B**. As set out above, the plan's strategic focus is to prioritise the delivery of housing as it helps to address barriers to economic growth. However, in a compact, constrained city, such as Oxford, with current strong demand for certain employment types, protecting the city's most socially and economically important or "key" employment sites for continued employment use and supporting their appropriate intensification and modernisation forms a key element of the preferred approach. In highly sustainable locations (i.e., the city and district centres), flexibility is important to ensure the on-going viability and vitality of the city's centres. This means that smaller sites in the city and district centres will not be protected for on-going employment uses.

004a-3 Housing on Employment Sites

6.8 The preferred approach for the Local Plan 2042 policy is to take forward **option B**. This option aligns with the plan's strategic focus to prioritise housing. The preferred approach recognises the importance of housing delivery but also the value that existing businesses and sites bring to the city. As such, housing proposed on the city's network of key employment sites must not undermine the continued operation or integrity of successful businesses and employment sites. The preferred approach includes wording to that effect.

004a-4: Location of New Employment Uses

6.9 The preferred approach for the Local Plan 2042 policy is to take forward **option A**. Limiting the acceptable locations for new employment-generating uses in a constrained city such as Oxford broadly aligns with the plan's overall strategy to prioritise housing. Focusing new employment-generating uses towards existing areas of employment can help to overcome existing accessibility issues and bring connectivity to support existing employment clusters through the delivery of key infrastructure projects (e.g., re-opening of the Cowley Branch Line to passenger trains).

Warehousing and Storage Uses – Draft Policy E2

6.10 The preferred approach for the Local Plan 2042 policy is to take forward a combination of **options B and C**. New warehousing and storage (B8) uses often involve large-scale developments that do not make an intensive land-use. As they do not always make the best use of available land, they are not always the most appropriate use for land within the city. It is important to support appropriately located B8 uses where they support the ongoing needs of businesses in the city. Option B supports B8 uses at a slightly wider range of

employment sites than is currently allowed. This means that local businesses who operate on important locally important employment sites will also be able to deliver small-scale B8 uses to support jobs and continued employment-related uses on identified sites. Option C helps support the Council's wider net zero ambitions to decarbonise 'last mile' deliveries in the city.

Community Employment and Procurement Plans (CEPPs) - Draft Policy E3

6.11 The preferred approach for the Local Plan 2042 policy is to take forward **option A**. Community Employment and Procurement Plans (CEPPs) have an important role to play securing opportunities that arise from new development. CEPPs can help businesses by addressing skills shortages locally through supporting appropriate training, apprenticeships and providing other commitments local both at the construction and operational phases of development. The preferred approach is to include a policy requiring CEPPs to be submitted alongside applications for qualifying developments.

Affordable workspaces – Draft Policy E4

6.12 The preferred approach for the Local Plan 2042 policy is to take forward **option A**. Including a policy requirement to deliver affordable workspaces helps key sectors (including those identified through the City Council's Economic Strategy), that make a vital contribution to the diversity of the economy. Suitable workspaces and premises to support the 'inclusive economy' can help foster creative activity, social enterprise, co-operative businesses and local start-ups in the city. Including a policy requirement to support the delivery of affordable workspaces in the Oxford and help facilitate an inclusive and diverse economy.

Tourism and Short Stay Accommodation – Draft Policy E5

6.13 Draft Policy E5 combines the preferred approaches from two options sets. Each options set considers a discrete element of the policy. The two options sets are as follows:

- 004e-1: New Tourism and Short Stay Accommodation
- 004e-2: Existing Tourism and Short Stay Accommodation

6.14 The preferred approach for each option set is set out below:

004e-1: New Tourism and Short Stay Accommodation

6.15 The preferred approach for the Local Plan 2042 policy is to take forward **option A**. This supports new tourism and short stay accommodation on allocated sites and at a variety of accessible locations across the city. It also helps deliver the city's wider visitor economy aims to encourage longer stays and increased spend in the city. The draft policy includes locational requirements that set out where new tourism and short stay accommodation in the city would be acceptable and supported through the planning process.

6.16 Focusing new tourism and short stay accommodation towards inherently sustainable highly accessible locations helps to reduce reliance on the private car and supports public transport and other non-car modes. It also aligns with the plan's overall strategy to prioritise housing as it reduces the pressure to locate new tourism and short stay accommodation on sites more suitable for housing.

004e-2: Existing Tourism and Short Stay Accommodation

6.17 The preferred approach for the Local Plan 2042 policy is to take forward **option B**. Supporting the appropriate expansion of existing tourism and short stay accommodation helps achieve the wider visitor economy aims and can also protect local amenity. The inclusion of criteria relating to the loss of tourism and short stay accommodation provides clarity about what is expected of applicants in a range of different circumstances.

Background paper 005

Title: Green Infrastructure and Biodiversity

This paper addresses the green infrastructure network, including the protection of green spaces and other features like trees, as well as the provision of new green infrastructure in development. It also discusses the protection of biodiversity, including designated sites, as well as enhancing biodiversity.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
SA Objective(s): **7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all.** **10. To conserve and enhance Oxford's biodiversity.**
SEA theme(s): Landscape, human health, biodiversity, flora, fauna.

1. Introduction 3

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 5

National Planning Policy Framework (Dec 2024) 5

Planning Practice Guidance and National Design Guide/Model Design Code 6

The Environment Act 7

Natural Environment and Rural Communities Act 2006 7

Conservation of Habitats and Species Regulations 2017 (as amended) 7

National Parks and Access to the Countryside Act 1949 7

Small Holdings and Allotments Act 1908 7

Oxford Local Plan 2036 8

Other relevant plans and programmes/strategies 8

Natural England Green Infrastructure Framework (2023) 8

Oxford City Council Green Spaces Strategy 2013-2027 8

Oxford City Council Playing Pitch Strategy 2022-2036 8

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 9
Green infrastructure 9
Biodiversity 13
The Oxford Meadows Special Area of Conservation (SAC) 14
Sites of Special Scientific Interest (SSSIs) 14
Local ecological designated sites 16
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 18
Green infrastructure 18
Biodiversity 19
5. Options for Local Plan 2042 20
Policy options set 005a (draft Policy G1): Protection of GI network and green features 21
Policy options set 005b (draft policy G2): Enhancement and provision of new GI features 24
Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor 27
Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity 30
Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity 33
Policy options set 005f (draft policy G6): Protecting Oxford's ecological network 36
6. Conclusions including key sustainability issues 40
Key sustainability issues for the Local Plan to address: 40
Preferred approaches for the Local Plan 2042 41
Protection of Green Infrastructure network and features – draft Policy G1 41
Enhancement and provision of new Green Infrastructure Features – draft Policy G2 42
Provision of new Green and Blue Infrastructure: Urban Greening Factor – draft Policy G3 42
Delivering mandatory net gains in biodiversity – draft Policy G4 42
Protecting and enhancing onsite biodiversity – draft Policy G5 42
Protecting Oxford's ecological network – draft Policy G6 43

1. Introduction

1.1 The green infrastructure network is an important issue to be addressed in the new Local Plan. There are various definitions used for the term Green infrastructure (GI); however, the 2024 National Planning Practice Framework (NPPF) defines it as:

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

1.2 The Planning Practice Guidance sets out that green infrastructure includes both green and blue spaces and can include:

A range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.

1.3 Green infrastructure forms an essential part of the city's natural capital which is the various elements of the natural environment which provide us with valuable goods and services. An important feature of GI is its multi-functional nature, which means that it can perform a range of services from which people can benefit and which can contribute positively to achieving various policy objectives. Such services include, supporting physical and mental health and wellbeing; encouraging investment and regeneration; building resilience to climate change; providing space for nature and supporting biodiversity; reducing flood risk; and contributing to improved air quality (Table 1.1). The Council must balance competing development needs in the city whilst also ensuring that it plans in a positive way for the creation, protection, and enhancement of Oxford's green infrastructure so that these various benefits can be maximised for the city in the future.

Table 1.1 - The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

Environmental

• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaptation, e.g., through providing flood and soil erosion protection, carbon sequestration and storage, urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking
Social/Health and Wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive safe spaces for people to enjoy and improve social contacts – a key component of 'liveable' towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land property values. • Supports sustainable homes and communities e.g., through providing local food, building materials, encouraging low carbon lifestyles e.g., through well-connected attractive travel walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaptation.

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Social/health and wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive and safe spaces for people to enjoy and improve social contacts – a key component of 'liveable' towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water quality, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land and property values. • Supports sustainable homes and communities e.g., through providing local food and building materials, encouraging low carbon lifestyles e.g., through well connected and attractive walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaption.

Table 1: The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

1.4 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

2.1 Highlights that planning for green infrastructure can help deliver a variety of planning policy objectives. Specifically, **para 20** states that green infrastructure is an element which local planning authorities should address in their strategic policies. **Para 164 and 199** highlight that green infrastructure should be considered as important mitigation measures

for the impacts of climate change and poor air quality. Further references are made to green infrastructure elsewhere in the document:

- **Para 35**: plans should set out the development contributions expected in association to green infrastructure and set out the levels and types required.
- **Para. 96**: Provision of safe and accessible green infrastructure is one example of a way that local authorities can enable and support healthy lifestyles.
- **Para. 135**: developments should optimise the potential of the site to accommodate and sustain an appropriate amount/mix of development including green and public space.

2.2 With regard to open space, **para 103** of the NPPF sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and climate change, and that local plan should assess what open space is needed and make provision to accommodate this. **Para 104** sets out strict conditions for when loss of open space, sports land/buildings and pitches can be lost.

2.3 In relation to Biodiversity, the NPPF also sets out:

- **Para 187:** that plans should: recognise the wider benefits from natural capital and ecosystem services such as trees and woodland, and minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- **Para 188:** that Local Plans should distinguish a hierarchy of designated sites and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- **Para 192:** that local plans should identify, safeguard components of wildlife-rich habitats and wider ecological networks; promote the conservation/restoration/enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify/pursue opportunities for securing measurable net gains for biodiversity.

Planning Practice Guidance and National Design Guide/Model Design Code

2.4 The online Planning Practice Guidance has a dedicated page for the natural environment including green infrastructure and biodiversity considerations. Paragraphs 4 to 8 include guidance on why green infrastructure is important and how local plans should take a strategic approach to addressing it including use of strategic policies to identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. Open space is addressed in separate guidance and sets out how this should be taken into consideration in Local Plans to support health and wellbeing.

2.5 In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and habitats; ‘proportionate’ information and assessment required on biodiversity impacts at all

stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

2.6 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

The Environment Act

2.7 This legislation received Royal Assent on 9th November 2021 and includes provisions to strengthen and improve the duty on public bodies to conserve and enhance biodiversity. In particular, it introduces a mandatory requirement for net gains in biodiversity of 10% from most forms of new development approved through the planning system, this must be calculated using the DEFRA Biodiversity Metric and informed by a biodiversity gain plan which details the strategy for how biodiversity net gain will be delivered. The Act also requires the preparation and publication of Local Nature Recovery Strategies to support Nature Recovery Networks by setting out priorities for nature recovery and proposing actions in the locations where it would make a particular contribution to achieving those priorities. These Recovery Strategies are to be prepared by 'Responsible Authorities' as appointed by the Secretary of State, Oxford falls into the strategy that will cover the Oxfordshire County area.

Natural Environment and Rural Communities Act 2006

2.8 Section 40 of this Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

Conservation of Habitats and Species Regulations 2017 (as amended)

2.9 Legislation that previously transposed the European Habitats Directive (European Commission 92/43/EEC) into English law was amended upon exit from the EU in order to transfer functions from the European Commission to the appropriate authorities in England and Wales but otherwise functions broadly the same. The Regulations designate Special Areas of Conservation (SAC) and Special Protection Areas as priority locations for biodiversity conservation. In Oxford, this is the Oxford Meadows SAC, and near Oxford are the Cothill Fen SAC and Little Wittenham SAC. The effects of any plan or programme on these designated areas must be assessed via a Habitats Regulations Assessment (HRA).

National Parks and Access to the Countryside Act 1949

2.10 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Small Holdings and Allotments Act 1908

2.11 This places a duty on local authorities to provide allotment gardens where demand for them exists. Requests for allotments submitted by at least six local people must be taken into account when considering whether demand exists. Allotment provision is also subject to other legislation arrangements less related to the planning process, including the Allotments Acts of 1922, 1925 and 1950.

Oxford Local Plan 2036

2.12 The topic of green and blue infrastructure in the city is addressed in detail in chapter 5 of the adopted Local Plan, 'Protecting and enhancing Oxford's green and blue infrastructure network', through policies G1 to G8. As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network including policy G2 which addresses biodiversity and the ecological network specifically, including protections for national and locally designated sites.

Other relevant plans and programmes/strategies

Natural England Green Infrastructure Framework (2023)

2.13 The Green Infrastructure Framework was launched by Natural England in 2023. It is a collection of policy tools and documents whose purpose is to assist local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development. The framework is structured around a number of key components that include a set of national standards on quantity/quality of GI; mapping; planning and design guidance. Whilst the Green Infrastructure Standards have no statutory power, they are intended to support better planning for good quality GI and help to target the creation or improvement of GI, particularly where existing provision is poorest. When supplemented with local knowledge and evidence, Natural England advise that they can be used to help set local targets for provision.

Oxford City Council Green Spaces Strategy 2013-2027

2.14 The strategy focuses on green space that is freely available to the public for informal recreation, allotments and play irrespective of who the land is owned by.

Oxford City Council Playing Pitch Strategy 2022-2036

2.15 This strategy is a needs and evidence-based document that is aligned with the adopted Local Plan, and it seeks to ensure that the city has a good supply of well-managed, well-maintained and efficient playing pitches and other outdoor sports facilities that would help to encourage residents to maintain healthy and active lifestyles. Whilst there was no legal requirement for a Playing Pitch Strategy, the Council had opted to develop one as one of the ways to promote healthier living and reduce inequality. The Strategy is intended to be reviewed every year and refreshed on a five yearly basis.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Green infrastructure

3.1 The Green Infrastructure study (2022) identified that Oxford's green spaces are providing a variety of roles that support health and wellbeing of residents and ecosystems. With regard to publicly accessible green spaces, the analysis highlighted that whilst there is a fairly even distribution of green spaces across the city in general meaning that accessibility for residents to walk or cycle to green spaces was good, however, there are inequalities in distribution of certain types of green spaces resulting in gaps in accessibility for specific types of green space. Whilst it is very challenging to establish significant new green space to counter these gaps, additional loss of open space in certain areas could exacerbate these accessibility problems or establish access deficits for other types of green space like parks or outdoor sports. In summary, the report found that:

- Allotments: Gap in access in the eastern part of the city centre (low deprivation) (however much of this area is university land), and smaller gaps in the north (low deprivation) and west (pocket of high deprivation) of the study area.
- Amenity green space: large gaps in access in the north and east of the city (low levels of deprivation, and small gaps in the south in Littlemore and Temple Cowley (high levels of deprivation). However, the good access to parks and recreation grounds across the city mitigates this.
- Parks and recreation grounds: Good access across the city. Small gap in the north in Wolvercote (low levels of deprivation) but there is access to amenity green space and accessible natural green space in this area, which helps to mitigate this gap in access (although it is acknowledged that these types of spaces do not typically offer the same level of facilities that a park might).
- Accessible Natural Green Space (15-minute walk time buffer): large gaps access in Cowley/Temple Cowley in the south and in the North (around Sunnymead), both in areas with relatively high levels of deprivation.
- Play space: for children's play spaces, gaps in access in the city centre (although much of this area is university land) and North Oxford (low levels of deprivation). There is also a gap in the south in Iffley (IMD decile of 6). For youth play spaces, small gaps in access in the centre and north of the city centre (in areas of low deprivation).

3.2 Informed by more than 200 site visits, the report also looked at quality and multi-functionality of the open spaces (helping to assess wider benefits they play to the local areas). It found that:

- The majority of public open spaces in the city (84%) were currently of good or excellent quality, however there are opportunities to improve quality on some spaces, with 16% assessed as fair or poor quality.

- Generally, the highest quality sites fall within areas of lower levels of deprivation, however there are exceptions to this. The wards with generally higher numbers of poorer scoring sites are Marston, Headington Hill and Northway, Quarry and Risinghurst, Barton and Sand Hills, Churchill and Lye Valley.
- Larger/destination parks within the city are high quality sites providing multiple functions and are important sites for tourism and built/natural heritage.
- Sites delivering very low numbers of functions tend to be private spaces and amenity green spaces. Smaller sites, including other typologies, typically delivered fewer functions (though not in all instances) and there are areas with lower levels of multifunctionality in the south and east of the city (which generally corresponds with areas of high deprivation).
- For lower scoring sites, common issues appeared to be low biodiversity value, poor access (e.g. path quality and overgrown vegetation), management of soft landscaping, dog fouling, litter and lack of signage.

3.3 Beyond public open spaces, there are a variety of greenspaces in the city which are not freely accessible to public, yet still make an important contribution to the overall green infrastructure network. For example, many of the schools and colleges in the city have their own playing fields and outdoor spaces which play an important role in the health and wellbeing of the young people and children in attendance and add to the sense of place locally (sometimes playing an important role in heritage setting particularly around the colleges).

3.4 According to land use data (2018), around 19.9% of Oxford's land use is classified as residential gardens. There is diversity in the amounts of green infrastructure that is present across Oxford gardens and policy has little control over how they are managed but many of these spaces nevertheless are an important location for green assets like trees in the city. Whilst only being accessible to individuals within the home, private gardens offer an important outdoor space for socialising and being active. Of course, there is not an equal distribution of this type of space across the community, and many individuals, particularly those living in flatted developments or house shares, may not have any privately accessible green space at all.

3.5 The GI study found that some of areas of the city with the lowest amounts of private garden are located in areas with lowest access to public open space. In these locations (highlighted in red and yellow in Figure 3.1), there is potential for existing open space to be under greater pressure from local residents. Notably, some of these locations are also areas of higher deprivation which could exacerbate existing health inequalities where residents are not able to benefit from sufficient outdoor space.

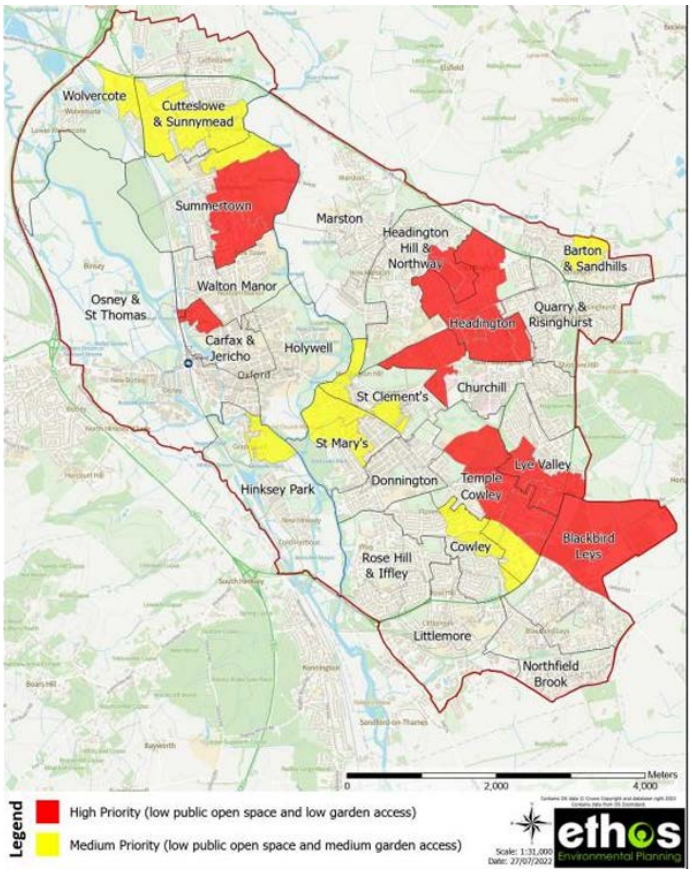

Figure 3.1 - Bivariate map showing areas of the city with lowest public open space in combination with lowest garden access (red are lowest)

3.6 Beyond green spaces, the city hosts a range of other important green infrastructure features such as trees. Trees are present in our greenspaces but also help to break up the urban fabric of roads and streets throughout the city. Many of these trees have been protected for their high amenity value through Tree Preservation Orders (TPOs) however there are a greater proportion that have not (and TPO designation is not the only determiner of high-quality trees). Oxford is also home to several areas of ancient woodland, including Brasenose Wood and at Shotover Country Park. The Oxford Urban Forest Strategy estimates that the urban forest in Oxford contains approximately 248,000 trees which equates to a total canopy cover of 22.3%; meanwhile separate analysis that used a slightly different methodology conducted for the GI study concluded with a similar figure of 21.02%. This is above the 20% minimum recommended by Forest Research for urban areas which is a positive, however, as Table 3.1 shows, canopy cover does vary across the city with some of our more deprived wards featuring some of the lowest amounts of coverage (e.g. Blackbird Leys).

Table 3.1 - Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived)

Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	1
Churchill	28.1	3
Cowley	19.71	4
Cutteslowe & Sunnymead	31.02	4
Donnington	22.28	2
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	4
Lye Valley	22.74	5
Marston	22.59	3
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	2
Summertown	26.26	6
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived).
Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	6
Churchill	28.1	3
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Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	2
Lye Valley	22.74	5
Marston	22.59	7
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	5
Summertown	26.36	8
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

Table 2: Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

3.7 The GI network also includes a range of blue spaces including the two rivers (Cherwell and Thames), a number of streams and smaller water courses, as well as the canal and other waterbodies like ponds and lakes. These features act as important corridors through the city and in between green spaces, providing habitat for wildlife and connectivity for people. The Water Cycle Scoping Study will discuss the current environmental conditions of the main water courses, which continue to be challenged by a range of pollutants such as from agriculture, urban runoff and sewer discharges.

Biodiversity

3.8 It has long been noted that the biodiversity around the country is under intense pressure and has been in prolonged decline. This biodiversity loss is particularly pronounced in cities and urban areas such as Oxford as wildlife is forced out of natural habitats due to development pressure, recreational disturbance, pollution from various sources, as well as climate change. A particular issue in the city relates to the ecological conditions in Oxford's rivers and streams as water quality is being put under pressure from various sources including sewage discharges, invasive species and pollutants arising from agricultural practices upstream. This issue is explored in greater detail in the separate Natural Resources Background paper and more fully in the Water Cycle Scoping Study.

3.9 Nevertheless, Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, including lowland hay meadows,

calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. A number of sites have been designated as being of particular importance to ecology including:

The Oxford Meadows Special Area of Conservation (SAC)

3.10 An internationally important site of nature conservation importance. The SAC is situated on the broad floodplain of the River Thames to the west and north-west of Oxford. The site is made up of an extensive complex of meadows and pastures which support species-rich grassland vegetation which would once have been widespread on floodplains in lowland England, but which is now very rare. The qualifying features for which the area was designated as a SAC are the presence of Lowland Hay Meadows habitat and the species *Apium repens* (creeping marshwort), which is a very rare plant of seasonally-flooded habitats. The Port Meadow population of this plant remains the largest and most consistently recorded in the UK.

3.11 Natural England's assessments indicate that the colony of *Apium repens* is under pressure from hydrological changes in the areas, possibly due to deeper, more prolonged and frequent flood episodes. There is also concern about invasive species moving into the habitat from other parts of the meadow and outcompeting the plant. Additionally, previous liaison with Natural England relating to Habitat Regulations Assessments work undertaken by the Council for the SAC have identified potential vulnerabilities arising from the impacts of air pollution (from traffic on the nearby roads), recreational disturbance due to increased visitors to the area (particularly those with dogs), as well as impacts from changes to hydrology and water quality as noted above.

3.12 There are also two other SACs within 20km of Oxford, these are:

- **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 last year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('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, the last year of analysis of Little Wittenham, it was of good overall ('global') value, but it is highly threatened by non-native invasive species.

Sites of Special Scientific Interest (SSSIs)

3.13 These nationally important designated sites include four geological SSSIs and eight ecological SSSIs that are wholly or partly within the city, as well as others nearby. Four of these SSSIs comprise the Oxford Meadows SAC: Cassington Meadows SSSI; Pixey and Yarnton Meads SSSI; Port Meadow with Wolvercote Common and Green SSSI; and Wolvercote Meadows SSSI.

3.14 Natural England intermittently publishes condition assessments for the units comprising the SSSIs, which is available on the Designated Sites View website. These assessments are usually 5-10 years old, as such the condition may have changed in the intervening years since the last assessment was completed. As can be seen in Figure 3.2 and Table 3.2, the SSSIs are in varying condition, and of the twelve within or partially within the city, two SSSIs are in unfavourable condition and three are partly in unfavourable condition, whilst the others are in a favourable condition.

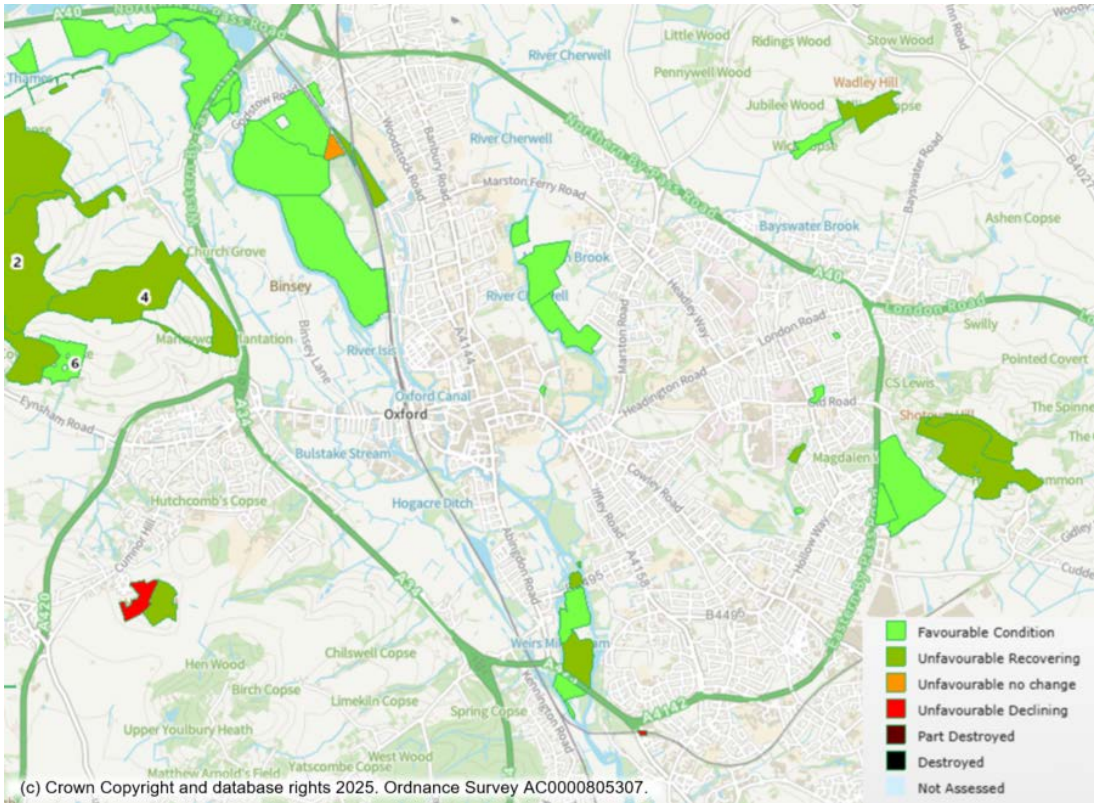

Figure 3.2 - Locations of Special Scientific Interest (SSSIs) within and around Oxford and their condition, source: DEFRA MAGIC website accessed 13.01.25)

Table 3.2 - Condition assessment for the Sites of Special Scientific Interest (SSSIs) within Oxford or nearby (Natural England)

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering

Littlemore Railway Cutting	0.50ha	Yes	100.00% Unfavourable declining
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove	0.43ha	Yes	100.00% Favourable
Magdalen Quarry	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable
Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

Local ecological designated sites

3.15 The city includes a number of locally important sites made up of Local Wildlife Sites, Oxford City Wildlife Sites and Local Nature Reserves. These are non-statutory sites of local importance for nature conservation, recognised for having high conservation value, containing rare species or habitats whose protection is bestowed upon them via the policies of the Local Plan rather than national legislation. This means that our policies will be particularly important for these local features which do not reach of the benchmark of higher protections and yet can still be valuable refuges of priority habitats and for local species.

3.16 Local Wildlife Sites are designated through criteria that is shared across the county, meanwhile Oxford City Wildlife Sites are sites of importance to the city which were established as part of work on the Local Plan 2036 (replacing what were previously known as Sits of Local Importance to Nature Conservation or ‘SLINCS’). Whilst the overall interest of OCWSs has not been considered sufficient to be of county level importance in the same way LWSs are, with appropriate management, many do however have the potential to become LWSs in the future. The Thames Valley Environmental Records Centre (TVERC), undertake yearly reviews of sites across the county and assign LWS status on new sites where these are deemed to meet specific criteria.

3.17 As part of its work on the Local Plan 2040, the Council undertook a high-level review of its existing OCWSs to consider whether it was still appropriate to protect them and whether there were additional sites that might meet the criteria of local designation as either an

OCWS (or LWS). This review was supported by a limited number of new surveys undertaken throughout 2023. As set out in Table 3.3, the work resulted in four previously proposed OCWSs being formalised (although in practice, these were already treated as full OCWS sites because of their proposed status at the time), as well as the addition of three new OCWSs. In addition, two sites were taken forward as LWSs via the county-wide selection process.

Table 3.3 - Recent updates to ecological network of local sites in city

Site name	**Result of review process**
Mileway Gardens	Previously proposed OCWS – Designation confirmed
Churchill Hospital Field	Previously proposed OCWS – Designation confirmed
University Parks	Previously proposed OCWS – Designation confirmed
Stansfeld Study Centre	Previously proposed OCWS – Designation confirmed
Burgess Field	New OCWS designation confirmed
Dunstan Park	New OCWS designation confirmed
CS Lewis Reserve	New OCWS designation confirmed
Showman's Field	New LWS designation confirmed
Marston Brook Meadow	New LWS designation confirmed

3.18 Beyond these formally designated sites within the city, there are also many of types of habitats which have been formally identified as being of importance in other ways. This includes Priority Habitats under Section 41 of the Natural Environment and Rural Communities Act 2006, many of which are included within Conservation Target Areas that were identified as part of work on Oxfordshire's Biodiversity Action Plan (BAP) for being the most important areas for wildlife conservation in Oxfordshire and where targeted conservation action will have the greatest benefit. It should be noted that the expectation is that the mapping of the Local Nature Recovery Strategy will subsume and replace the previous Conservation Target Areas.

3.19 There are also areas of irreplaceable habitat in the city, which are afforded significant protection through national planning policy. These types of habitat include several areas of ancient woodland, including at Brasenose Wood and at Shotover Country Park which straddles the boundary of the city to the east, as well as areas of lowland fen habitat such as can be found in the Lye Valley SSSI.

3.20 The various types of habitat discussed above are important for supporting a range of wildlife species, many of which are under direct threat from pressures like habitat loss, climate change and pollution. The city has records of a variety of notable species, again as identified under Section 41 of the Natural Environment and Rural Communities Act 2006 referenced above. Species that are present in Oxford and that are protected under the Act include, but are not limited to: Hedgehogs, Water voles, Dormice, Swifts and Slow worms.

3.21 It is not only the natural environment which supports some of these different types of wildlife either. There are certain species present in the city which have come to rely upon elements of the built environment to support their life cycle. For example, urban birds like swifts which return to the UK every spring to breed and raise young and that have experienced significant declines. Swifts have come to rely on buildings for nesting and will often return to the same nest site each year so the re-development and demolition of buildings, and loss of old nest sites can have further negative impacts. The development process can support the species through careful design and inclusion of artificial roosting features.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Green infrastructure

4.1 Up until 2036 the currently adopted Local Plan will maintain protection of the network of green infrastructure across the city, after which date national policy (which affords its own strict protections for open space) will apply. Other legislation outside of planning that protects certain green spaces like allotments, as highlighted in section 2 will continue to apply.

4.2 Nevertheless, a growing population means that there is likely to be increasing demand for outdoor sports provision and public open spaces in the long term. Ongoing development pressure as the city grows means that these spaces will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this can lead to a deterioration of these spaces. The quality of existing spaces already varies across the city, without additional investment, facilities associated with some green spaces may deteriorate further, exacerbating this uneven distribution in quality.

4.3 Different types of green spaces could face different challenges. In areas of the city where access to private gardens is reduced, there is likely to be particular demand on public spaces like parks and smaller amenity green areas for people to socialise and undertake physical activity, as well as allotments (many of which already have waiting lists).

4.4 Some types of GI will continue to be protected from inappropriate development through other mechanisms outside of the Local Plan, for example some trees benefit from Tree Preservation Orders (TPOs) and conservation area protection. Formal allotments benefit from protection that can only be removed via application to the secretary of state. Some of our parks and gardens benefit from heritage protection as Registered Parks and Gardens.

4.5 Blue spaces like the rivers and streams are already facing pressures from pollution as well as historic development of their banks. It is likely water quality issues relating to sewage pollution will continue without additional investment from Thames Water into the

Wastewater Treatment Works, although with sufficient upgrades as are proposed, these issues could then improve. Other sources of pollution that are not within the control of the Local Plan are likely to continue without separate actions in the relevant areas such as changes to agricultural practices. Without a new Local Plan there could be additional pressure for developing on open spaces along embankments, particularly beyond 2036, which could have impacts on the water courses and exacerbate the challenges they face.

4.6 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).

Biodiversity

4.7 Up until 2036 the currently adopted Local Plan will maintain protection of ecological sites within the city (via LP2036 policy G2). The Local Plan 2036 sets out that development that results in a net loss of sites and species of ecological value will not be permitted and includes specific details of protection/mitigation required for the SAC, SSSIs and Local sites. After that, protection will fall to national policy which affords protection to nationally designated sites as well as protections more generally to open space.

4.8 The requirement of 5% net gain in biodiversity in Local Plan 2036 policy G2 for all major developments proposed on greenfield sites or brownfield sites that have become vegetated has already been superseded by the 10% requirement of the Environment Act. With the mandatory 10% biodiversity net gain being set as a condition unrelated to the Local Plan and with the expectation being that the associated habitat is secured for at least 30 years, there is potential that biodiversity could receive increasing support going forwards without a new Local Plan, however, opportunities for this net gain to be delivered within the city are likely to be limited. The county's Local Nature Recovery Strategy (LNRS) will identify opportunity areas for enhancement actions to improve biodiversity in due course, however, the LNRS cannot force enhancements nor assign additional protection, thus these opportunities will rely on willing landowners and sufficient sources of funding, thus their benefit for biodiversity is not certain.

4.9 The GI study 2022 noted the unequal distribution of certain types of green space and this is likely to remain the case in the absence of the new Local Plan – and this would include more nature rich spaces. The constrained nature of the city means that opportunities for creation of significant new green spaces within the denser urban areas will remain limited

and smaller-scale enhancement are likely to be more forthcoming where resource and changes to management practices are forthcoming.

4.10 The same challenges of climate change as noted above will apply to biodiversity too such as by making ecological sites less suitable for the species that rely on them or driving changes in species distribution as they move to better suited climates. It could also lead to influxes of invasive species that are better suited to the new climate. Generally, it has been suggested that in the longer term, there is a significant risk of direct impacts on priority habitats. Equally, pressures on watercourses impacting ecological conditions will likely continue without various interventions such as upgrades to key wastewater infrastructure as are noted in the green infrastructure section.

5. Options for Local Plan 2042

5.1 The analysis set out in the previous sections of this background paper indicates the need for the Local Plan 2042 to include policies that will ensure that Oxford is a city with an extensive green and blue infrastructure network, a good level of biodiversity and with resilience and adaptability in the face of climate change.

5.2 The Plan will therefore include policies that address the following topic areas:

- the protection and enhancement of the city's green infrastructure network,
- securing gains in biodiversity, and
- enhancement of the resilience and adaptability of the city to climate change.

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report).

5.5 Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 005a (draft Policy G1): Protection of GI network and green features

5.6 The proposed options set out to protect a network of different open spaces. The options consider the protection of the open space network in a couple of ways, either assigning similar protection to all sites, or identifying a hierarchy of sites with different levels of protection. The options seek to protect the network through one policy, rather than having bespoke policies for each type of space in the network, but there is an option which considers whether additional policies could be applied to different types of spaces. There is also an option for protecting trees, hedgerows and woodland.

Table 5.1 - Policy options set 005a: Protection of GI network and green features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere).	Ensuring that we are protecting a network of spaces and features at various scales will help to ensure that the needs of local residents and the environment are met at various levels. Ensuring spaces are connected, and protected from further fragmentation, can help support quality of these areas and wider nature recovery. The city is limited in its green infrastructure, particularly open space. Once open space is lost, it can be very difficult to reprovide. Beginning from a standpoint that all spaces are valuable and should be protected in themselves helps to recognise this challenge. Protecting open space regardless of quality recognises that every space has the potential to make an important contribution to	The green infrastructure study has identified that some green spaces and features are of a higher quality than others – performing a more important role in supporting the city than others. Considering the high demands for space in the city in order to meet other objectives, such as providing affordable, quality housing for residents, it may be preferable to protect only the higher quality, strategic spaces, or those with practical opportunities to enhance. This would allow us to release poorer quality spaces for other needs, rather than treat all spaces with the same degree of importance. Careful wording will be needed to ensure this approach clearly fits in with the NPPF wording that protects all green spaces

	health and wellbeing as well as wider sustainability, particularly to the local area.	unless they are shown to be surplus or can be re provided.
Option b Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in exceptional circumstances, to permitting development with reprovision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy.	Gives further clarity than option a, and provides opportunity to identify higher quality, strategic and multifunctional sites and prioritise these for protection over sites that have less adverse impact if lost to development.	Categorising sites may be subjective exercise and run risk of depriotising spaces that may still bring about benefits.
Option c In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecologcial sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.	This option could allow bespoke policy approaches to specific types of green space and any unique needs/concerns.	This approach may add a level of confusion where there are protections of a particular category both within and outside of the network (for example some outdoor sports pitches may be a multifunctional part of the network and others may have protection only as outdoor sports).
Option d Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the retention of existing	Trees perform several important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of established trees and to incorporate the	Where high quality trees are already protected by Tree Preservation Orders, additional tree protections could be considered too onerous in the development of particularly constrained sites.

trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.	planting of new trees. Tree canopy cover often has the biggest impact on setting and as such that correlates to the benefits that trees can bring. Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the City Council having been made aware of them and designating in this way. It is unlikely that all high-quality trees in the city are protected in this way however, thus many will not benefit from TPO protection.	
Option e Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.	This option recognises that there are key areas of open space with value to supporting health and wellbeing in the city. These larger spaces are likely to have more capacity for enhancement than smaller ones too. It would ensure that key areas are identified and protected across the city whilst diverting development pressure away to poorer quality areas or areas that provide less benefit overall.	Green infrastructure works best when thought of as an interconnected network, which this approach would ignore. Smaller spaces and linear features contribute to and enhance larger spaces, as well having an equally important role in supporting day-to-day wellbeing – breaking up urban environment, supporting climate resilience, creating wildlife corridors and encouraging active travel.
Option f Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.	National guidance on GI standards is developing, including the full launch of the Natural England GI Framework later in 2022.	Relying on national standards for green infrastructure provision could risk ignoring local contextual issue and priorities which a local policy can help to address.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options or combinations e.g. option A or B, A+C, B+C, A+B+C, A+B+C+D, A+D, B+D, E, F) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, **7. Green Infrastructure,** and to **10. Biodiversity**. There is also some relevance to criterion **3. Efficient use of land,** as the use of designations and protections that restrict development on greenfield land. All options are going to score positives for criteria 2, 3, 7 and 10, apart from option g (no policy – defer to national policy/standards) which would score neutral. All other options seek to put in place some form of baseline level of protection on all green spaces, creating designations dependent on the function or type of green space, and restrictions. The differences between the policies are of degree and extent. The extent of the positive impact of these options will depend largely on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005b (draft policy G2): Enhancement and provision of new GI features

5.7 Green features on sites can be designed in ways that allow them to perform multiple benefits for the local area, e.g. making space for biodiversity, recreation, climate resilience. The policy options in this set consider how opportunities can be maximised for delivering new and improved green infrastructure and securing the various benefits associated with it, whilst cumulatively bringing about a greener and healthier city. They also consider options for securing new open space, though opportunities for this will likely be limited to larger sites.

Table 5.2 - Policy options set 005b: Provision of new GI features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require green and blue infrastructure features on all new development – guide expectations through tailored	More bespoke tools would align with the wider spatial approach to the Local Plan and such tools/approaches could be tailored to meet	Quantifying green infrastructure provision and its benefits can be a subjective process which is not an exact science.

requirements in different areas of city or on different scales of site including: i. Compliance with Urban Greening Factor to demonstrate net gain ii. % new open space on larger sites iii. Bespoke guidance on greening within allocations policies.	specific needs/challenges in different areas of the city (e.g. areas of deficit, deprivation, with poor air quality, highly urbanised sites). National policy encourages use of such tools as a standard. Such tools can allow for better analysis and more effective design of green infrastructure, assist in practical delivery and better quantification of benefits. With better quantification of green infrastructure, comes the potential for better monitoring of what is being delivered in a design proposal.	There is the potential for any provision of green infrastructure by applicants to be tailored to meet only the bare minimum as required by any such policy (e.g. the minimum acceptable to meet policy), rather than striving to maximise provision or be more innovative. Potential for more complicated/onerous development management process which would need to be addressed with quality guidance.
Option b Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features. Set out principles for what should be included. Leave requirements flexible, to respond to the site's specifics.	Larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city – ensuring these are captured with a requirement for a specific level of open space helps to contribute to new open space provision. Smaller sites in the city are typically more limited in what green infrastructure features they can provide, as such, requiring new provision to be factored into their design, but leaving flexibility in how this achieved, would allow for different proposals to respond in the best way possible for the site.	Many developments in the city have historically been on smaller sites and not of the scale large enough to meet the need for open space provision on larger sites. Asking for green infrastructure, without specifying more exact/quantifiable targets risks under provision and proposals not maximising the potential for green infrastructure on a site. In relation to smaller sites and requiring green infrastructure without setting more exact targets, historically, it has been difficult to monitor and therefore assess the

	Requiring open space provision on smaller sites could lead to small, unusable spaces that are costly to manage and maintain and offer little value to residents, as has historically been experienced in the city.	performance of similar policies.
Option c Set out a specific quantity standard of the number of hectares per 1,000 population for green space provision on all new developments in city	This would provide a simple target to monitor and report on.	Such a target would not necessarily be meaningful as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. It is more meaningful to measure and provide greenspaces on a more localised basis. Work on the Local Plan 2036 identified the challenge that it is increasingly difficult to manage the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites.
Option d Do not include a policy for providing new green infrastructure, defer to national policy/standards.	This would allow for greatest flexibility for applicants to work within the constraints of their site.	This option would be limited in influencing the amounts of greening undertaken on a site and would not set any minimum expectations on proposals. It could result in opportunities to maximise green infrastructure being missed and is likely to have less of a positive influence on the design of natural elements of designs.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B, A+B, C, D)

High-level screening conclusion? the options are similar to each other from a sustainability perspective.
Screened in for detailed appraisal? No

Rationale:
In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, and **7. Green Infrastructure**. There is also some relevance to criterion **10. Biodiversity.**

All options are going to score positives for criteria 2, 7 and 10. because they seek to bring in additional greening as part of new development, apart from option g (no policy – defer to national policy/standards) which would score neutral. The differences between the policies relate to how the additional greening is delivered and how the amount is determined. The extent of the positive impact of these options will be dependent on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor

5.8 At its most basic, the Urban Greening Factor (UGF) is a policy tool that provides a way of simply quantifying green surface cover on a given development site via a metric system. UGF schemes have been applied in several cities through planning policy including the London Plan and the Southampton Local Plan. The methodology is also one of the Headline Standards that form the basis of the Natural England Green Infrastructure Framework.

5.9 The UGF can be used to quantify in simple terms the amount of green infrastructure being proposed as part of a development scheme. Policies that incorporate the UGF can require proposals to secure a certain target, or to simply demonstrate a betterment in score compared with the existing site. The use of the UGF is intended to achieve separate objectives to biodiversity net gain, though it will be mutually supportive. Instead, the key intent of the UGF is to help address a variety of wider place-making and environmental issues, for example, making spaces that are more pleasant for people, as well as delivering resilience/adaptation to climate change (more green infrastructure can improve flood resilience and reduce urban heat).

5.10 Requiring applicants to use an UGF could be a useful way of improving the way that green infrastructure provision on sites is quantified. The policy options below set out possible approaches for applying the tool in the Oxford context and have been developed with consideration of the strengths and weaknesses of the methodology.

Table 5.3 - Policy options set 005c: Provision of new GI features – Urban Greening Factor

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development	Would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. UGF tools are quick and simple to use and to be understood by a range of users, they can assist in discussing and visualising levels of greening on a site. Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.	The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures. Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc. as with any other application. They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric. The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, but it would be an additional ask of applicants.
Option b The scale of application of the UGF tool could be across select sites/ areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be: • Major applications • Specific site allocations which are not already sufficiently green. • Retail/district centres	This avoids unnecessary work by avoiding areas that are already particularly green. It is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.	Could be missing out on opportunities to promote greening elsewhere in the city – encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.

• Areas of deficit of green surface cover and/or heightened climate risk.		
Option c Incorporate the use of an Urban Greening Factor (UGF) into policy with bespoke higher scoring for areas of the city identified as a priority greening area - determined by the level of deficit of green surface cover and/or heightened climate risk.	This can secure targeted betterment in areas where there is a clear deficit of green space and potentially reducing the greening requirement on developers for schemes in areas that are already particular green.	Oxford is highly constrained and has a high level of density in some areas. Desktop assessment already indicates what is likely to be an achievable threshold of UGF score, which is lower than the NE baseline. Development sites tend to be fairly small and compact particularly in dense areas where there is deficiency in green space. Achieving higher bespoke scores in areas where there is already deficiency will be difficult and potentially unviable – testing
Option d The scale of application of the UGF tool could be mandatory across all developments in the city.	The ease of use of the tool and the non-prescriptive requirement of simply achieving betterment (leaving a site greener than it started) could be quite easily applied to many areas.	Some sites in the city are already quite green and achieving betterment could be difficult to achieve/of little value. The tool is better suited to harder, grey areas with little greening at present. The tool does not distinguish between quality/condition in detail, therefore, there is a risk that on particular green sites, the policy requirement could promote replacement of existing established/quality features for other poorer quality features.
Option e Do not incorporate an UGF into policy	The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but	The tool is a simple and practical way of quantifying and better negotiating net gains in greening on sites which has

	complementary aims, however, it is an additional ask of applicants.	a range of benefits including climate adaptation, mental and physical health and wellbeing and biodiversity.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? various options (A, A+B, A+C, A+D, E) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options relate to whether or not to include policy requirement for undertaking an urban greening factor assessment (option a) or not (option e), as well as various options for the scale of application to which such a requirement would be applied (options b, c and d). In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **7. Green Infrastructure,** and to **criteria 5. Inequalities** (some of the options address greening in areas that are below average for green infrastructure currently). All options are going to score a minor positive for criteria 7. because they seek to bring in additional greening as part of new development, apart from option e (no policy) which would score neutral. Option b and c seek to prioritise greening in areas which are lacking, (the difference is just which areas) so would also score a minor positive for inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity

5.11 There is a national mandatory requirement for providing 10% Biodiversity Net Gain (BNG) as part of planning applications (subject to some exceptions in the legislation). Applicants are incentivised through the DEFRA biodiversity metric (used to calculate net gain) to provide this onsite or in areas identified within an appropriate strategy, but are able to find other offsite options where necessary.

5.12 The constrained nature of many sites in the city means that BNG may need to be provided offsite in many instances even if kept to the national minimum target, going higher than this may have impacts in terms of what other features can be provided onsite, or result in more BNG having to go offsite. Where offsite delivery is necessary, the Local Plan can play an important role in steering where this should go. The Local Nature Recovery Strategy is emerging at present and identifies opportunity areas where enhancements for biodiversity could be particularly valuable, meanwhile, in advance of that, Conservation Target Areas and previous Nature Recovery Network mapping can help steer net gain to

suitable areas. The options considered relate particularly to how offsite delivery should be guided, but also whether higher BNG targets should be incorporated.

Table 5.4 - Policy options set 005d: Delivering mandatory net gains in biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a hierarchy for how 10% net gain as required through Environment Act should be delivered, particularly where on-site net gain is not possible. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas) in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.	The approach is in line with national expectations for net gain in biodiversity and would allow more flexibility to secure other types of benefits for sites too e.g. other types of onsite features not addressed by the BNG metric (as is the topic of option set G5). The national guidance, and the BNG metric, are not as prescriptive about where off-site gains should be delivered, so this approach would provide some local steer about the Council's priorities. This policy would help to ensure that any off-site delivery of net gain would be to the benefit of the local area in first instance before options further afield are considered.	There is an element of repetition of the national BNG legislation here which may not be necessary. The city has limited capacity for taking on additional biodiversity enhancement to the scale and specific standards required through the Environment Act/DEFRA metric. As such, whilst a policy could try to focus any off-site delivery in the local area, geographical constraints may limit its effectiveness and options further afield, even beyond the boundary, may be necessary regardless. Off-site delivery may actualy deliver better outcomes for biodiversity if geared towards landscape-scale nature conservation. From a net gain perspective, it may be less effective forcing constricting delivery to local areas first (particularly onsite).
Option b Require higher than 10% net gain, in excess of the minimum requirements of the Environment Act (but subject to same exemptions as apply to national 10% requirement).	Recognises the importance of supporting biodiversity and acting on biodiversity decline nationally by setting a standard higher than the nationally imposed minimum.	10% net gain on sites as required by Environment Act is likely to be challenging enough in many areas of city. A higher target is not considered realistic/deliverable

Set out hierarchy for where this should be delivered if on-site not possible. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.		particularly on many smaller, constrained sites and could result in more off-site mitigation, as opposed to on-site measures. This off-site mitigation is unlikely to all be within the city, but instead via contributions to schemes across the wider county. There are other measures that can support biodiversity which are not recognised by the DEFRA metric and that would not be boosted under this option. Eng. wildlife friendly features like bird boxes, insect hotels, hedgehog highways etc. Additional demands in terms of net gain could impact ability/viability to provide for other needs. The additional cost of this will affect the affordability and therefore selection of other policy approaches that are equally important.
Option c Do not include a policy addressing biodiversity net gain requirements as set out in Environment Act, defer to national guidance/policy.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments. It may be that this is brought into the NPPF at a national policy level instead.	The national requirements in the Environment Act are not informed by local context. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on off-site delivery elsewhere in city (and, as last resort, beyond city). Could result in limited benefit to local area.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Either option a, b or c (they are alteratives to each other). **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options relate to whether the Local Plan should include policy guidance setting out the Council's preference for how offsite biodiversity net gain should be provided, guiding this to the local area and the opportunities identified in the LNRS, before looking more widely (option a and b) or not to set any local guidance. Option b also weighs up an approach of requiring more than 10% biodiversity net gain. In terms of sustainability impacts, the options most directly relate to **criterion 10. Biodiversity.** Options a and b are likely to have minor positive impacts for the criteria, though in practice they do not exceed national standards particularly and are principally focussed on articulating how the Council would wish to see BNG implemented in the city. Option a and b would both seek to try to ensure that even if biodiversity net gain cannot be delivered onsite, it would be guided to local areas in the city (particularly those that are also identified as opportunities in the LNRS), potentially reducing the risks that this would otherwise be provided much further afield and to mimimal benefit to local biodiversity. Option b might result in more positive impacts because it would seek to secure higher proportions of BNG than the national 10% target, however, larger targets are less likely to be able to be accommodated on many of Oxford's constrained sites and would also likely reduce the pool of local offsite opportunities that could accommodate this where it is not able to be met onsite (meaning it may go further afield) - thus the benefit is likely to depend on implementation. Option c would still likely result in minor positive impacts, because of the national target of 10% BNG which would still apply to all applicable planning permissions, which is likley to result in positive improvements over time even without the benefit of local policy specifying the Council's preferences for how BNG should be implemented. Overall, the sustainability impacts are unlikely to vary significantly between the options and it is not considered necessary to scope these in for further detailed appraisal.

Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

5.13 Whilst the national mandatory Biodiversity Net Gain (BNG) targets for planning applications promote habitat creation to support biodiversity, there are other needs for supporting species that are not recognised as part of the Environment Act's net gain requirements but that can still be highly beneficial. For example, the ways we design the urban environment can either support or hinder movement of species between habitats, meanwhile, certain species such as swifts and bats have adapted to rely on elements of the built environment for shelter where these spaces are designed in the right way. Habitat

creation to satisfy BNG may also not always be able to be delivered onsite and so it is important to seek to secure other types of enhancements to support biodiversity too.

5.14 The options considered in the below table address the ways that the Local Plan can support biodiversity in other ways beyond BNG. They range from more prescriptive requirements that still retain some flexibility to meet needs of particular sites, to less prescriptive requirements or having no policy at all.

Table 5.5 - Policy options set 005e: Protecting and enhancing onsite biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Policy with prescriptive requirements to secure biodiversity features on site. • Could require a specific number of enhancements on each site selecting from a pre-defined 'biodiversity points list' (e.g. bat box, bird box, wildflowers). • Points could be broken down into several pots/categories. • Potentially different points targets for householder, minors and majors applications. Could potentially be supported by updated Technical Advice Note (TAN).	Highlights on-site biodiversity measures as a priority for the Local Plan/Oxford City Council. Policy could be tailored to challenges of delivering biodiversity net gain in a constrained city like Oxford. Would primarily seek to secure some sort of onsite improvement and support/fill in gaps left by Environment Act which may result in off-site compensation for on-site impacts. More specific targets (e.g. through point system) would be more practical to monitor and implement. A pre-defined list would provide guidance to applicants about what is most suitable for their site/location.	Every site is likely to be different, risk that a prescriptive list/point system could be too blunt a tool, limiting any benefits. On more constrained sites, the scope for biodiversity enhancements will still be challenging.
Option b Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/or how much/or	Highlights on site biodiversity measures as a priority for the Local Plan/Oxford City Council. Allows more flexibility than Option b for developers to work within the constraints of a site.	Less prescriptive policy and lack of quantifiable targets for what measures are expected could result in less effective policy and less influence on what comes forward. Without a minimum target, proposals

the standard of those measures. Could potentially be supported by updated TAN.		may be more likely to fail at maximising opportunities on a site.
Option c No bespoke policy on supporting biodiversity on site, instead, via complimentary policies (e.g. sustainable design and construction), include requirements to incorporate general ecological enhancements.	Constrained city means achievable measures could have limited effect anyway, protection of established ecological sites nearby may be more effective overall.	The Environment Act requirements likely to have issues with achieving onsite net gain in many parts of city, resulting in off-site contributions, exemptions also, meaning net gain in real terms could be limited. A specific policy would highlight this as a priority for the City Council, not including one could weaken this position. General encouragement of ecological enhancements means effectiveness of policy is harder to quantify and monitor.
Option d Do not include a policy for protecting and enhancing on site biodiversity, defer to national policy/standards.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments.	Environment Act 10% net gain is focused primarily on habitat creation which equates to habitat units and will have limited benefits for addressing wider needs of many species present in Oxford. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on offsite delivery elsewhere in city (and, as last resort, beyond the city). Could result in limited benefit to local area and lead to ecological impoverishment.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Either option a, b, c or d
High-level screening conclusion? the options are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? No

Rationale: The options presented set out alternative approaches for the Local Plan to address provision for onsite biodiversity beyond what is expected as part of the Environment Act 10% net gain requirements and could be treated as standalone alternatives to each other. Options a, b and c set out different ways that additional biodiversity enhancements could be secured through policy. Option d would mean no local policy requirements.

In terms of sustainability impacts, the options all most directly address SA **criterion 10. Biodiversity**, whilst some of the enhancements that might be secured under the options could support **criterion 7. green infrastructure**, this would depend on implementation (some biodiversity enhancements could instead take the form of other features like bird boxes, swift bricks, etc), so it is difficult to assess impacts. For criterion 10. Options a, b and c are all expected to have some varying level of minor positive impact, with more prescriptive requirements of options a and b likely to have a slightly more positive impact than option c, which has the potential to be a less effective approach. Option d is likely to have a neutral or minor negative impact for criterion 10. Whilst the net gain requirements of the Environment Act are likely to ensure key habitat features are identified on a site and a net gain of 10% biodiversity secured, this does not have to be onsite and could be provided for off-site and potentially outside of the city. Equally, the BNG process is focussed on habitat and may not fully address impacts on particular species onsite or in the surrounding area, meaning there is potential for new development to have harmful impacts if these are not mitigated through other mechanisms. Under criterion 7. Whilst this is dependent on implementation, options a, b and c could result in minor positive impacts where enhancements are in the form of greening and habitat creation measures, meanwhile option d would likely be neutral. Other than option d, the options for this policy are about securing additional benefit for biodiversity from development, and the impacts for sustainability are similar and not considered significant enough, regardless of option, to warrant detailed appraisal.

Policy options set 005f (draft policy G6): Protecting Oxford's ecological network

5.15 There is a range of sensitive species and habitats across the city which need to be considered in the development process. Onsite, there may be features already present that need to be investigated and appropriately addressed through the design process in order to mitigate impacts. Additionally, there are a range of designated sites across the city of varying national/local significance, and whilst the nationally important sites benefit from high levels of protection through national policy, the locally valuable sites rely on Local Plan policies for their protection. The sites have varying characteristics and can be

sensitive to different types of impacts from developments which applicants would need to consider.

5.16 The options set below includes options for addressing onsite biodiversity through the development process, as well as options for how to protect the wider ecological network across the city. These national and local designated sites would also be identified within the green infrastructure network (the subject of draft policy G1), and as such these options would set out additional considerations for development that could impact these particular sites in relation to their special biodiversity functions.

Table 5.6 - Policy options set 005f: Protecting Oxford's ecological network

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site.	There are often habitat/features/species that exist outside of designated sites in the city which are valuable and need to be protected where possible. Ensures developers assess potential impacts on legally protected species.	This would involve additional checks and assessment for applicants before commencing work.
Option b Include a policy which protects the city's network of national and local designated sites from development. Define hierarchy within the network, with level of protection based upon importance/value of species/habitat they have been designated for such as: • International designations (SAC) • National designations (SSSIs) • Local sites like Local Wildlife Sites and Oxford City Wildlife sites. • Priority habitat.	Ensures that the city's most important areas of habitat and species are protected from the direct and indirect impacts of inappropriate development in future. Also ensures that the level of protection is proportionate to the level of ecological interest. Protection of SACs, SSSIs and irreplaceable habitats set out in legislation/NPPF. No specific protection for locally designated sites, although the NPPF requires local plans to identify, map and safeguard such sites. Also acknowledges that there is differentiation in local designations where Oxford	Protecting designated habitats is important for supporting biodiversity in the city, however, there are likely to be other smaller/undesignated habitats which provide an important supporting/connecting role which will need to be safeguarded where possible also. Space in the city is under demand to deliver upon a variety of objectives, including providing for affordable/quality housing and jobs – these needs must be balanced with the need for protecting biodiversity, but will necessarily be limited as

Reiterate national guidance for how to deal with irreplaceable habitats.	has multiple tiers of locally designated sites; notably, more stringent criteria area applied in designating local wildlife sites (LWS) versus Oxford City Wildlife Sites (OCWS). Also ensures protection of sites/habitats that are of notable ecological value but not previously identified through selection of designated sites.	space is secured for other purposes like this.
Option c Set out that proposals will need to consider a range of potential impacts depending on the context of application and proximity to any protected site(s), particularly, but not limited to: • Loss of protected land • Recreational impacts • Changes to the hydrological regime (groundwater, primarily), • Impacts on water quality • Impacts from air pollution.	Recognises that there are different characteristics/qualities for which sites are designated and these are at risk from different impact mechanisms arising from development. For example, some sites in the city, such as the SAC and Lye Valley SSSI are particularly at risk from changes to hydrological regime (e.g. changes to groundwater flows and pollution impacting water quality). Others are at risk from other pressures. Provides a hook in policy from which to develop additional helpful guidance, potentially tailored to particular locations or types of sites (e.g. Technical Advice Notes) that can provide further detail for area specific requirements/considerations -- e.g. where applications impact a particular designated site.	Whilst the approach would flag the range of considerations that applicants may need to consider and address in an application, the level of information needed to assess and justify no impact will vary depending on the level of protection on a site and type of application (e.g. likely a higher burden of information needed where proposal impacts a site protected through national legislation). Would be challenging to provide detailed steer on this at Local Plan policy level, and the level of assessment would need to be determined by the applicant through reference to the appropriate information.

Option d Include separate policies focussed on specific sensitive areas in the city, e.g. in proximity to the Lye Valley, or the SAC, with bespoke requirements focussed on particular risks (e.g. changes to groundwater flows).	Particular considerations tailored to the specific risks to these areas could be set out clearly for development coming forward nearby.	There is a network of ecological sites in the city and varying levels of national/local significance and Focussing policy on particular risks to the areas might reduce the ability to look at wider impacts from development as a whole. There may be other adverse effects that particular developments may need to consider. There are other ways to provide more specific guidance on particular locations, e.g. Technical Advice Notes, which can be kept updated more regularly throughout the Local Plan's lifetime.
Option e Do not include a policy protecting biodiversity including ecological sites. Instead, defer to national policy/standards.	There is already legislation and national policy governing the upper levels of the hierarchy so may not be necessary to repeat that locally.	Particularly for local sites of ecological importance, the Local Plan is the key means through which these designations are protected from inappropriate development.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations e.g. option a, a+b, a+b+c, a+ c, d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** If not taking forward option e (no local policy), it is likely a combination of options that include option a would be taken forward. Option a sets out requirements for identifying what is already on a site and responding accordingly. The additional options presented are either to include a policy protecting a hierarchy of ecological sites, including those of

national/internation importance and those of local importance (option b), or to have more specific policies focused on particular areas (option d). Option c isn't an alternative, but rather an additional element that could be incorporated into option b which would set out additional guidance/expectations for proposals to consider a range of impacts that could cause harm to these sites.

In sustainability impacts arising from the options, these would most directly relate to SA **criterion 10. Biodiversity.** Whilst option a is likely to have a neutral impact, as it is about identifying the biodiversity features present on a site and mitigating any impacts from development, Options b and c would have minor positives for this criterion by helping to ensure that existing biodiversity onsite is identified/protected and that the most valuable sites in the city for ecology would be protected from harmful development, particularly the locally important sites that do not benefit from the same levels of protection in national legislation as the SAC and SSSIs (option c would just provide further detail about implementation in relation to dealing with adverse impacts). Option d would be similar, but more focussed to particular locations and would thus depend on implementation (which locations). Option e is likely to have neutral impacts in relation to the national sites (because they are already strongly protected at national level), however, there would potentially be minor negative impacts in relation to the local sites not protected in the same way through national policy.

Overall, the sustainability impacts of the options are principally focussed on mitigating impacts from development and protecting what is already there, so they are unlikely to differ significantly enough from each other to warrant detailed sustainability appraisal.

6. Conclusions including key sustainability issues

6.1 Oxford's green infrastructure network is a multi-faceted resource that brings multiple social, environmental and economic benefits to the sustainability of the city. One key component of the network is the hierarchy of ecological sites, some of which are of national importance, whilst others are of local importance, which are designated for their value to nature. Its protection and enhancement will be an important issue for the new Local Plan, as will avoiding and mitigating any impacts on Oxfords flora and fauna whilst also enabling net gains in biodiversity in line with the objective of the Environment Act. There are likely to be a variety of measures that can be explored going forwards to contribute to these goals.

Key sustainability issues for the Local Plan to address:

- Green infrastructure, and particularly tree cover, is lacking in some of the city's most deprived wards.
- Unequal access to, and distribution of, high quality green infrastructure across the city exacerbates wider health inequalities but also mean that there are likely priority areas which would benefit particularly from increased greening.

- Increased recreational pressure as a result of new development generating additional residents/visitors in area puts pressure on GI and biodiversity.
- The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure, changes to the hydrological regime as well as invasive species.
- Two SSSIs out of the twelve in the city are in unfavourable condition and three are partly in unfavourable condition.
- Development pressure on, or near to protected sites could result in direct loss of habitat or species, fragmentation of ecological networks, as well as indirect impacts e.g. from noise, light, air pollution.
- Infill development within the city, particularly on garden land, can impact upon some informal/supporting habitat for wildlife within these spaces.
- Climate change is likely to impact habitats and species distribution, it may also impact upon the functionality of open spaces in the city (e.g. during flooding).
- Air pollution from increased vehicle movements impacts sensitive sites in locality.
- There is likely to be an increased need for sites for off-site biodiversity net gain stemming from development nearby (Environment Bill).
- Water quality impacts from new development as well as ongoing pressures from existing development, such as wastewater discharge related pollution and run-off from roads etc. can negatively affect biodiversity.

Preferred approaches for the Local Plan 2042

6.2 Section 5 identifies a number of topics that the Local Plan 2042 could implement policy to address which relate to the provision of green infrastructure, securing biodiversity and enhancing resilience to climate change. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Protection of Green Infrastructure network and features – draft Policy G1

6.3 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of aspects from options **A, B, C** and **D.** This combination of options establishes the principle of a city-wide connected green infrastructure network made up of spaces and features of different scales and type, that will be subject to varying levels of protection. This approach is considered the most effective way of protecting all public and private green infrastructure in the city from inappropriate development and mitigating the impact on green spaces of development in general. Policy can establish a hierarchy of protection for all green spaces in the city, which can identify spaces that are particularly important to the city in terms of their function, historical significance or local amenity and where needed can ensure levels of protection that go beyond what is stated in national policy. This approach would allow us to set out the specific conditions under which certain

types of green space may be lost to development, and measures to mitigate the impact of such losses including reprovision. The approach would also recognise importance of trees and set out expectations for developments that might impact them.

Enhancement and provision of new Green Infrastructure Features – draft Policy G2

6.4 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of options **A** and **B**. Policy would set out requirements for green and blue infrastructure features to be associated with new development schemes, and where there are existing GI features for these to be enhanced. The approach will allow for specific requirements for new or enhanced features as applicable to the parameters of the site and its context. Specific amounts of open space provision will only be required for large sites. The combined approach will allow for some degree of flexibility with respect to requirements depending on the parameters of the site, while ensuring that GI forms a fundamental element of development schemes coming forward.

Provision of new Green and Blue Infrastructure: Urban Greening Factor – draft Policy G3

6.5 The preferred approach for the Local Plan 2042 draft policy is to take forward **option B**. This option will incorporate the use of UGF into policy and the use of the tool will be encouraged for all developments, however its mandatory use will only be required for a selected category of development. This approach will enable targeting application of the methodology to where the most benefits may be accrued, for example development types that present opportunities to secure significant betterment in green surface cover or areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.

Delivering mandatory net gains in biodiversity – draft Policy G4

6.6 The preferred approach is to take forward **option A.** This approach would maintain BNG requirements in line with national requirements, recognising that onsite delivery is already challenging on many constrained sites, but also that there are various other onsite enhancements that the Council is seeking to drive forward to improve the environment and provide for biodiversity alongside the 10% habitat net gain as recognised by the DEFRA metric (e.g. draft policy on urban greening G3, draft policy G5 onsite ecological enhancements). This approach would also ensure that where onsite provision cannot be achieved, offsite provision is guided towards areas that most benefit the city and wider county, particularly focusing on the Local Nature Recovery Strategy areas once adopted.

Protecting and enhancing onsite biodiversity – draft Policy G5

6.7 The preferred option for the draft policy is **option A** which would set prescriptive requirements for types of onsite ecological enhancements that are expected of development. This approach will help to provide clarity for applicants as to expectations and allow the Council to set out a list of features that would be most appropriate to the

city's context and the needs of particular local species. Flexibility can be introduced to accommodate varying context of development sites by allowing applicants to pick a number of features from this list. The policy will complement the 10% BNG requirements and help to ensure that even where BNG cannot be delivered onsite, some provision for biodiversity is incorporated. There may be opportunities to tailor the list of features so that they complement the types of enhancements that the Local Nature Recovery Strategy identifies as opportunities within the city.

Protecting Oxford's ecological network – draft Policy G6

6.8 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of **options A, B and C.** Option **A** will help to ensure that development appropriately investigates and addresses any existing biodiversity on site in accordance with the mitigation hierarchy (e.g. seeking to avoid impacts before thinking about mitigating). Meanwhile options **B** and **C** mean that the Local Plan can identify and protect a the network of designated sites in the city, including locally important sites and set out the various considerations that applicants may need to take into account in order to avoid adverse effects. This should mean that applicants fully consider all the relevant information and potential impacts from their development, taking into account the varying characteristics of different sites around the city. The expectation would be that, where appropriate, additional guidance would be provided through technical advice notes which expand on the policy and help applicants to interpret its requirements, e.g. setting out how the Council expects them to avoid adverse effects in relation to particularly sensitive sites.

Background paper 007

Title: Flood risk, SuDS and drainage

This paper addresses flood risk and new development including SuDS and drainage
SA Objective(s): 2. To build resilience to climate change including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Water, climatic factors, human health

1. Introduction 2

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

The Flood and Water Management Act, 2010 3

National Planning Policy Framework (NPPF) 3

National Planning Practice Guidance (PPG) 4

New national flood and coastal erosion risk information 4

Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026 4

Catchment Strategic Plan, Part of our Drainage and Wastewater Management Plan (DWMP) for Oxfordshire, Swindon, Wiltshire, Gloucestershire and Warwickshire, Thames Water, 2023 5

Our Catchment Plan, Thames Water, 2018 5

Oxford City Council “Our Strategy” 2024-28 5

Oxford Local Plan 2036 Policies on Flood Risk 6

Oxford City Sustainable Drainage Design and Evaluation Guide 6

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal) 7

Fluvial Flooding 7

Surface Water Flooding 9

Sewer Flooding 10

Strategic Flood Risk Assessment (SFRA) 10

Taking account of Climate Change impacts when looking at Flood Risk 10

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 11

5. Options for Local Plan 2042 Policies..... 12
Policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments.. 14
Policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDs)..... 19
6. Conclusions including key sustainability issues 22
Key sustainability issues for the Local Plan to address:..... 22
Preferred approaches for the Local Plan 2042..... 22
Flood Risk and Flood Risk Assessments - Draft policy G7 23
Sustainable Drainage Systems (SuDs) - Draft policy G8 23

1. Introduction

1.1 Oxford is located at the confluence of two rivers, the Thames and the Cherwell, as well as numerous watercourses. The risk from river flooding is one source of flooding that has the potential to impact development in Oxford, with other sources including groundwater, surface water and sewer flooding. The ongoing impact of climate change, including projected wetter winters and increased incidences of intense rainfall events, is likely to exacerbate these risks in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health.

1.2 Oxford has a history of flood events with several occurring during 2024, where a number of flood warnings were issued, temporary defences deployed, several roads closed and footpaths along the city's waterways completely obscured. Other recent flood events were at the start of 2021, with more historic flooding events occurring in January 2014, November 2012 and July 2007, each of which resulted in significant disruption to the city. This series of flood events resulted in a programme of short-, medium- and long-term measures including the development of the Oxford Flood Alleviation Scheme (OFAS) - the primary purpose of which is to reduce the risk of flooding for properties and infrastructure.

1.3 This background paper provides a brief overview of some of the flooding issues in the city, including SuDS and drainage. It begins by taking a look at flooding from a policy perspective, reviewing relevant policies, plans and programmes at the national, regional and local level. It then goes on to set out the current situation for flooding in Oxford, looking at each source of flooding in turn and how they present a different set of issues. Then the paper moves on to look at what would happen if we didn't produce a plan before setting out what potential topics could be included in the new plan. Finally, it draws out some of the key issues relating to flooding.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The Flood and Water Management Act, 2010

2.1 This piece of legislation requires better management of flood risk, creates safeguards against rises in surface water drainage discharges and protects water supplies for consumers. It gave a new responsibility to the Environment Agency for developing a National Flood and Coastal Risk Management Strategy, and established upper tier local authorities (in our case Oxfordshire County Council) as Lead Local Flood Authorities and provided them with a range of duties.

National Planning Policy Framework (NPPF)

2.2 Paragraphs 170-182 of the NPPF set out the policy for planning for development in flood risk areas. It requires a sequential approach to development: sites should not be allocated, or permitted, if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It also requires an exception test for proposed development in areas of flood risk: this requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Paragraphs 180-181 focus primarily on planning applications and paragraph 182 states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. It is expected that these sustainable drainage systems will provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Local Planning Authorities need to have appropriate policies in place on sustainable drainage systems.

2.3 Paragraph 125 (b) of the NPPF recognises that some undeveloped land can perform many functions, including flood risk mitigation. The NPPF also requires that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies. The NPPF states that the SFRA will be the basis for determining the sequential approach to development. This is important as applicants need not apply the sequential test again on sites allocated in the development plan through the sequential test.

2.4 The NPPF was recently updated and published in December 2024, however there were not any significant amendments to the flooding policy. A few minor amendments were made to the September 2023 version of the Framework, which included specifically referencing that improvements to green infrastructure and other forms of infrastructure can provide opportunities to reduce the causes and impacts of flooding as well as explicitly stating that as well as development being resistant and resilient to flooding, in the event of a flood,

buildings should be able to be quickly brought back into use without significant refurbishment. Additionally, a separate Annex 3 was provided which classifies flood risk vulnerability.

National Planning Practice Guidance (PPG)

2.5 The Flood risk and coastal change section of the PPG was last updated in August 2022. Significant amendments were made at the time to bring the guidance up to date and in line with the latest policy position on flood risk introduced in the updates to the NPPF in 2018 and 2021. Paragraph 078 refers to a table which sets out the definition of the different flood zones:

- Flood Zone 1 has the **lowest** probability of flooding
- Flood Zone 2 has a **medium** probability of flooding
- Flood Zone 3 has a **high** probability of flooding
- Flood Zone 3b is the **functional flood plain** and this zone comprises land where water has to flow or be stored in times of flood.

2.6 The key difference made in 2022, is that the definition of the functional flood plain (Flood Zone 3b) changed from an annual probability of 1 in 20 (5%) or greater in any year to 1 in 30 (3.3%) or greater in any year.

2.7 The PPG on Flood Risk and Coastal Change provides more detailed guidance as to the application of the sequential and exception tests in the context of plan-making and planning applications. It also provides additional information on the "sequential approach to the location of the development" and provides some over-arching guidance relating to "taking flood risk into account in preparing plans".

New national flood and coastal erosion risk information

2.8 In December 2024, the Environment Agency published a new report summarising the changes to the National assessment of flood and coastal erosion risk in England in 2024. In March 2025, new national flood risk assessment (NaFRA) was also made available. Its intention is to provides a single picture of current and future flood risk from rivers and the sea, and from surface water, using both the existing detailed local information and improved national data. This includes future scenarios accounting for climate change. This new flood zone data is expected to inform any new flood risk assessments, including those undertaken at a strategic level.

Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026

2.9 The Flood and Coastal Erosion Risk Management (FCERM) Strategy for England was published in 2020, with an initial 1-year action plan showing the actions needed, published in May 2021. The Environment Agency has recognised that a longer-term view is now needed to implement the strategy and to address this, they have worked with partners to develop a roadmap. The roadmap contains practical actions out to 2026, which once completed will help to implement the strategy's 2100 vision. These include actions such as

taking forward projects and programmes that will pioneer innovative ways of boosting flood and coastal resilience and make a difference to their local communities, as well as identifying practical ways in which flood and coastal investments can contribute to wider priorities, including local nature recovery, carbon reductions and more integrated water solutions that help with both flood and drought resilience.

Catchment Strategic Plan, Part of our Drainage and Wastewater Management Plan (DWMP) for Oxfordshire, Swindon, Wiltshire, Gloucestershire and Warwickshire, Thames Water, 2023

2.10 Thames Water produced a strategic plan which develops a strategy for the next 25 years to meet future challenges such as climate change and population growth which could impact the sewerage and drainage systems in the region. The document also illustrates the range of investment that is required for each of the catchments across the region (including Oxford) and identifies sewage treatment works that will need to be upgraded within the next 25 years to ensure treatment capacity keeps pace with growth.

Our Catchment Plan, Thames Water, 2018

2.11 Thames Water produced a plan which includes an analysis of the causes of sewer flooding and pollution in the Oxford catchment. These include heavier and more intense rainfall events happening more often; deterioration within the sewerage network and blockages caused by fat, oil and grease deposits, resulting in flooding and operational issues; loss of local river flood plains; and increasing river flooding. The report notes that the foul sewers were not designed to cope with surface water. For example, in the Grandpont area, the deterioration of some of the sewers within their network has allowed groundwater into the foul sewers. At Abingdon Road, flooding from surface water sewers has also occurred as a result of high river levels and / or restriction of the outfalls due to vegetation growth.

2.12 The Our Oxford catchment plan is currently at the Options Appraisal stage. Thames Water are recommending an intervention comprising short-, medium- and long-term measures. Short-term activities will include their ongoing work to improve the operation of their network and their response to problems as they occur. Medium term activities will include the refurbishment of their local sewerage network to reduce pollution and foul sewer flooding. Long term activities include the review and refinement of their catchment approach based on the experience gained, and outcomes achieved from the short- and medium-term interventions.

Oxford City Council "Our Strategy" 2024-28

2.13 The City Council's "Our Strategy" document sets out the importance of working with partners to deliver improved flood defences and managing the increased risks of flooding in order to help the city become more resilient to climate change.

Oxford Local Plan 2036 Policies on Flood Risk

2.14 The Oxford Local Plan 2036 is the current development plan for the city and it contains a number of policies that relate to flood risk. In particular, Policies RE3 and RE4 set out the City Council's approach to flood risk, sustainable drainage, and also provide the policy approach in relation to water management at some of Oxford's important nature conservation sites. Policy RE3 includes strict provisions as to what development will be granted planning permission in Flood Zone 3b. Any proposal must meet all of the criteria in this policy and must be for water-compatible uses or essential infrastructure; or, where it is on previously developed land, it must represent an improvement of the existing situation in terms of flood risk.

2.15 Policy RE3 was informed by the Flood Risk and Sequential Test of Sites Background Paper. In line with the associated guidance in the PPG, when developing site allocation policies, the sequential test was applied if any of the potential sites were outside of Flood Zone 1. Before allocating sites in higher risk flood zones, it was demonstrated that there were no reasonable alternative sites available in areas with a lower probability of flooding that would have been appropriate to the type of development or land use proposed. Any proposals for the development of sites in Flood Zone 3a that incorporated 'more vulnerable' uses such as housing also required the exception test. In the case of Oxford, where previously developed sites in Flood Zone 3b were proposed, an exception test was also required. Paragraphs 1.21 to 1.59 of our Statement of Common Ground with the Environment Agency provide more detail as to how the sequential and exception tests are applied in Oxford.

2.16 The Flood Risk and Sequential Test of Sites Background Paper set out the individual capacities of sites within each Flood Zone and demonstrated that Oxford had insufficient capacity to accommodate its housing need within lower risk flood zones. Consequently, development sites were allocated within higher risk flood zones applying the sequential test. These sites must be accompanied by a site-specific flood risk assessment when planning permission is sought.

Oxford City Sustainable Drainage Design and Evaluation Guide

2.17 In 2010 the Flood and Water Management Act proposed that sustainable drainage systems (SuDS) should be used on most development and this was confirmed in a ministerial statement in 2015 introducing the 'non statutory technical standards' for SuDS. The evaluation guide to sustainable drainage was published in 2018 and provides a link between the design of SuDS with the evaluation requirements. The design and evaluation guide promotes the idea of integrating SuDS into the fabric of development using the available landscape spaces as well as the construction profile of buildings. This approach provides more interesting surroundings, cost benefits, and simplified future maintenance. This guide provides a background context for SuDS designs, taking into account the landscape character and local geology and provides advice on what type of SuDS is most suitable in Lye Valley; a Site of Special Scientific Interest (SSSI) with a unique nature, where special consideration to the type of SuDS must be given.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 In Oxford there are major technical obstacles which mean any solutions to flooding will be expensive, provide different levels of protection and not benefit everyone in the affected communities. Proposals can be brought forward that will reduce the risk to many people, but major flood defences are not a realistic option in the foreseeable future. The most sustainable way of managing flood risk in Oxford will be through a Flood Risk Management Strategy. As set out in the introduction, flooding occurs from a number of sources including groundwater, surface water, river, and sewage flooding. Each will be looked at in turn to present a current picture of what is happening in the city.

Fluvial Flooding

3.2 Fluvial (or river) flooding occurs when a river bursts its banks and water spills out onto the surrounding land. This type of flooding is caused by heavy rain. Fluvial flooding is the primary source of flood risk in Oxford in terms of flooding extent, the number of properties at risk and historical flood damages. Oxford is located at the confluence of the River Thames and River Cherwell, and is at risk from both watercourses independently, as well as concurrently in large flood events. As can be seen from Figure 3.1 below, large parts of Oxford are at risk from this type of flooding. Some areas of flood risk in Oxford allow the river to naturally burst its banks onto river floodplain, however other areas have properties in them.

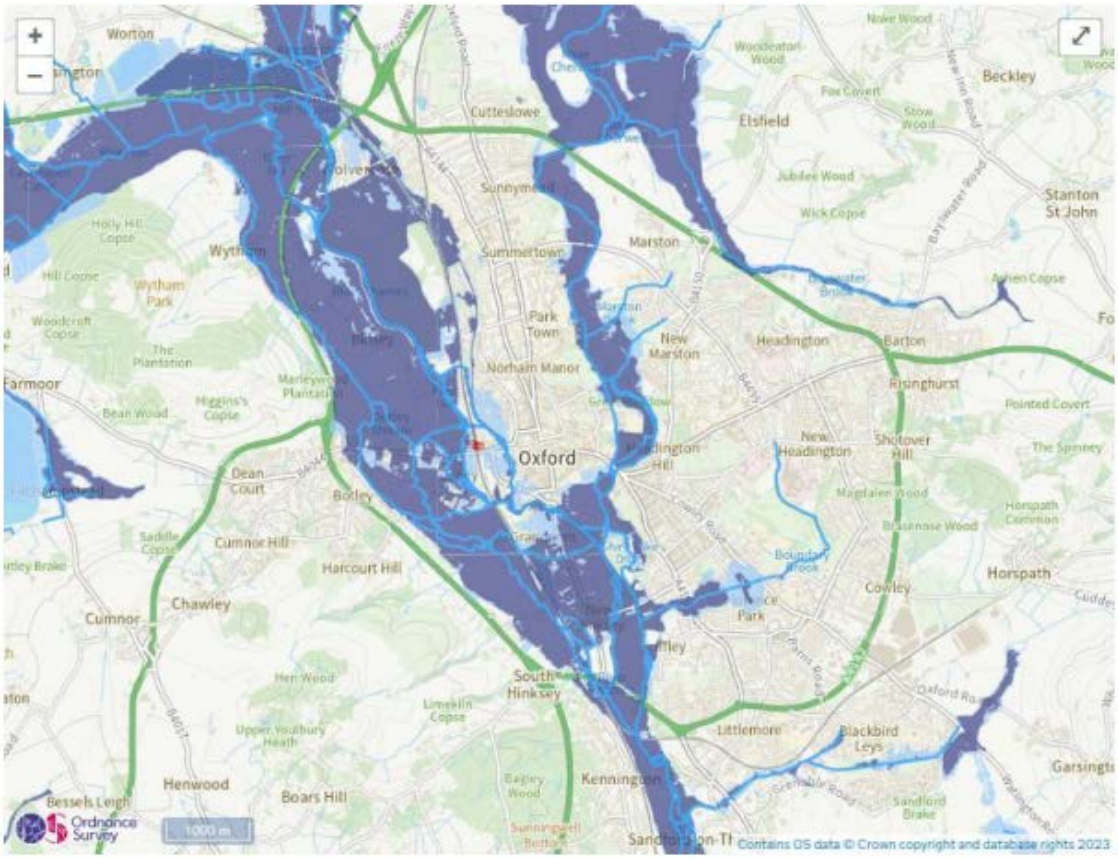

Figure 3.1 - Flood map showing risk of river flooding in Oxford (Environment Agency, 2023)

Groundwater Flooding

3.3 According to the Environment Agency, groundwater flooding:

> *"can happen when the level of water within rock or soil underground – known as the water table – rises. When the water table rises and reaches ground level, water starts to seep through the surface and flooding can happen. This means that water may rise up through floors or underground rooms such as cellars or basements."*

3.4 The Environment Agency and British Geological Survey have investigated the nature and mechanisms behind groundwater flooding in Oxford. In the majority of cases, it has been found that local ground water is linked to river flows and has an independent response to rainfall. There is a lack of reliable data however, therefore a system of water level measurement points for future monitoring purposes has been established.

3.5 The Environment Agency holds and updates a groundwater flooding register identifying the locations and nature of specific groundwater flooding events. For Oxford, the groundwater register has identified 21 records of suspected ground water flooding. These occurred between 2000 and 2003 and 2007 and 2009. 15 of the incidents occurred within the city, whereas 6 were located just outside the city's boundary. Groundwater flooding tends to occur in low lying areas, with clusters of incidents in New Hinksey, Grandpont and New

Botley. These three areas all lie within Flood Zone 3, so the groundwater incidents are likely to be associated with fluvial flooding.

3.6 Four of the incidents reported immediately to the west of the Cherwell-Thames confluence are within Flood Zone 1. The sites are located on gravels like those within the floodplain. Although the incidents took place within Flood Zone 1, the proximity of the Rivers Cherwell and Thames means that groundwater emergence is likely, especially during periods of high-water level in the two rivers.

Surface Water Flooding

3.7 Surface water (or pluvial) flooding happens when heavy rainfall overwhelms local drainage capacity. It is a significant risk affecting 3.2 million properties in England. Surface water flooding is **more** difficult to forecast than flooding from rivers as it is often caused by periods of intense rainfall. This is because "current meteorological methods are not able to pinpoint where or when potential intense rain will arrive, nor can they know or predict the capacity of local systems to manage the level of rainfall." There are several high-risk areas near the city centre where surface water pools, including large parts of St Aldates and Speedwell Street to the south of the city, and George Street to the west. The Oxford City Level 1 Strategic Flood Risk Assessment (WHS, 2023) indicated that ground levels to the west and south of the city are lower than those in the city centre, which may explain why water is shown to pool in these locations. The greatest risk of surface water flooding is around certain roads pertaining to the areas of Jericho, Headington, Summertown, Woodstock Road and the city centre. Recent surface water flood incidents have been reported at the following locations:

Figure 2: Recently recorded surface water flood incidents

Area	Road	Year
Headington	Old Road	2020
Summertown	Summerhill Road	2020
Summertown	Water Eaton Road	2023
Woodstock Road	Blandon Close	2020

Table 3.1 - Recently recorded surface water flood incidents

Area	Road	Year
Headington	Old Road	2020
Summertown	Summerhill Road	2020
Summertown	Water Eaton Road	2023
Woodstock Road	Blandon Close	2020

3.8 Most of the areas identified above tend to be located outside of the floodplains of the River Thames and River Cherwell, meaning that the main source of flooding shown in these areas is likely to originate from surface water flooding rather than from fluvial flooding.

Sewer Flooding

3.9 Sewer flooding is when sewage or foul water leaks from the sewerage system (through pipes, drains or manholes) or floods up through toilets, sinks or showers inside a building. The responsible authority for sewer flooding across in Oxford is Thames Water, the sewerage undertaker, who have confirmed that a total of 155 historic records of sewer flooding have been recorded within the Oxford City administrative area since records began. The most incidents have occurred in the built-up areas of New Hinksey, Grandpont, Botley, Osney and Marston.

Strategic Flood Risk Assessment (SFRA)

3.10 The NPPF requires local plans to be supported by an SFRA and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as Lead Local Flood Authorities (in this case, Oxfordshire County Council). The EA provides guidance on how to undertake an SFRA. The most recent SFRA was undertaken in 2023 to support the emerging Oxford Local Plan 2040 (now withdrawn). A Level 1 SFRA was initially undertaken which identified all flood risk areas, based on all sources of flooding and taking account of the latest climate change allowances. A Level 2 SFRA was then carried out as it was determined that the City Council could not allocate all land for development outside flood risk areas. The Level 2 SFRA gives more detail on the nature of the flood risks identified and where the sequential and exception tests will need to be applied. Although the Oxford Local Plan 2040 has now been withdrawn, the 2023 SFRA is based on the most up-to-date modelling available at the time, including running the associated central, higher central and upper end climate change allowances, which provided a comprehensive update to the flooding mapping for the city. The Level 1 assessment in particular therefore provides a very useful baseline (regardless of which site allocations are taken forward in the Oxford Local Plan 2042). However, any future SFRA will need to use the new flood zone data that was published by the Environment Agency in March 2025.

Taking account of Climate Change impacts when looking at Flood Risk

3.11 The paragraphs below summarise the approach that was taken in respect of taking account of the climate change allowances in the Local Plan 2040. The new Local Plan will have to determine if this approach is still the preferred one.

3.12 An important part of predicting the likely impact of flooding in the future is looking at the likely impacts of climate change. In flood risk terms, climate change is likely to bring increased wetter weather and more incidences of various types of flooding. The headline findings from the current UK Climate Projections released in 2018 (known as UKCP18) highlighted that in the most recent decade (2009-2018), the UK climate has been on average 1% wetter than 1981- 2010, and 5% wetter than 1961-1990. Looking into the future, UKCP18 reported that rainfall patterns across the UK will vary, but that by 2070, under a

scenario of high greenhouse gas emissions, winters will on average grow increasingly wetter and summers drier. However, despite overall summer drying trends in the future, there are likely to be future increases in the intensity of heavy summer rainfall events, particularly for urban areas in the UK, which will have an impact on the frequency and severity of surface water flooding.

3.13 To take climate change into account in planning for flood risk, the 2023 SFRA has been informed by the latest guidance released by the Environment Agency on how local planning authorities, developers and their agents should use climate change allowances. There are allowances for different climate scenarios over different epochs, or periods of time, over the coming century.

3.14 For Oxford City, the peak river flow and peak rainfall intensity allowances are relevant and have been used in any relevant modelling updates. For peak river flow, Oxford falls within two management catchment areas: Gloucestershire and the Vale Management Catchment and Cherwell and Ray Management Catchment. The climate change allowances for the Cherwell and Ray are significantly lower than those for the Gloucestershire and the Vale. The majority of the Oxford administrative area lies within the Gloucestershire and Vale Management Catchment, therefore this in combination with the more precautionary climate change allowances, is why this management catchment has been deemed to be the most appropriate one to use for Oxford. More detail on how the climate change allowances have been applied to the updated hydraulic modelling can be found in the Level 1 SFRA (2023). In the emerging Oxford Local Plan 2040 (now withdrawn), we also looked at the implications of climate change on a site-specific basis as part of gaining a clear understanding about whether development proposed in higher-risk flood zones would be safe, as well as meeting the other tests set out in national policy. Climate change allowances were applied to all site allocations assessed as part of the Level 2 SFRA.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Flood risk from a range of sources will be an ongoing challenge in the city. Climate change is projected to bring about wetter winters and more incidences of high intensity rainfall events, which is likely to increase the risks of flooding, particularly in highly urbanised parts of the city and within the flood risk zones.

4.2 In the absence of a new local plan, local flooding policy would still be in place until 2036, as long as the plan remained “up-to-date”. In the absence of an up-to-date local plan, development management decisions would need to be made against the national framework. As the NPPF presently contains a strong policy framework at the national level for flooding, it is unlikely that new or existing development would be adversely impacted by this change.

4.3 More locally, the Environment Agency is working in partnership on a major new scheme to reduce flood risk in Oxford. The Oxford Flood Alleviation Scheme (OFAS) will cost around £176 million and is one of the biggest flood schemes in the country, with the aim of reducing flood risk to homes, businesses, services and major transport routes into the city. The OFAS will create a new stream with wetland wildlife corridor to the west of Oxford. The intention of the scheme is to reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, as well as to the railway, Botley and Abingdon Roads, other local roads, utilities and services such as broadband. The scheme will also bring additional environmental improvements to the area, including creating new wetland which will link up existing wildlife sites. The proposed scheme is approximately 5 km long, starting just north of Botley Road and passing under the A423 Kennington Railway Bridge (Southern by-pass) to the south before re-joining the River Thames.

4.4 In spring 2022, the Environment Agency submitted a new planning application for the scheme to Oxfordshire County Council, who in summer 2024, resolved to grant planning permission for the OFAS. Approval is subject to the application first being referred to the Secretary of State for the Ministry of Housing, Communities and Local Government, due to the scheme's location in the Green Belt. The Secretary of State will decide if they wish to make a determination. The Environment Agency also made a new compulsory purchase order (CPO) for the scheme. There was a public inquiry into the CPO, led by an independent inspector, which ran from 14 November 2023 to 26 January 2024. In May 2025, the Secretary of State confirmed the CPO which means the Environment Agency can progress with purchasing the land and securing the access needed to build the scheme.

4.5 Although a scheme like the scale of OFAS has the potential to significantly reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, even with flood defences in place, an element of residual risk will remain in areas that are prone to flooding. Residual risk can arise from the failure of flood management infrastructure such as a breach of a raised flood defence or blockage of a surface water conveyance system.

4.6 In respect of sustainable drainage systems (SuDS), the absence of a local plan would not be so impactful. National policy now requires SuDS on not just major developments (over 10 dwellings), but for minor developments (fewer than 10 dwellings) within an area liable to flood from surface water or groundwater, or that are likely to increase flood risk locally, as well as for developments that need sustainable drainage solutions to be provided. The relevant policy in the current Oxford Local Plan 2036 (Policy RE4) contains a hierarchy of SuDS approaches to apply and refers applicants to the guidance provided by either the City Council (minor development) or County Council (major development).

5. Options for Local Plan 2042 Policies

5.1 The analysis set out in the previous sections of this background paper indicates that flood risk is a key issue that new development will need to consider and respond to depending

on where it comes forward in the city. The process by which drainage is managed on sites is also a related consideration.

5.2 The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Addressing flood risk and requirements for flood risk assessments
- Sustainable Drainage Systems (SuDs)

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table

Policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

Table 5.1 - Policy options set 007a: Flood Risk and Flood Risk Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Reiterate national policy and set out requirements for when an FRA will be required, particularly where there is less certainty within national policy (e.g. extensions). Include expectations for how flood risk ought to be assessed, avoided, managed and mitigated. This will include where flood risk could be impacted off-site.	Applications for extensions are a regular occurrence across the city, including within Flood Zone 3b. Owing to the constraints within the city we are seeking to allow some householder extensions if it can be demonstrated that it will not result in a significant increase in flood risk. This option would set out greater certainty as to what is expected.	Whilst the Local Plan can set out some basic principles that should be applicable to most situations, there is likely to always be an element of site-specific context which will need to be considered and may require deviation from these principles. With more extensions permitted within Flood Zone 3b, there is a risk of cumulative impacts from increased developed footprint over time.
Option b For extensions proposed within Flood Zone 3b – set out some key principles/ requirements that will need to be met to address flood risk before these will be permitted.	This option would make explicit the City Council's expectations for when FRAs are to be submitted, and how flood risk is to be addressed in Oxford. It would ensure that where flood risk is present on a site, this is effectively assessed and then addressed in the most appropriate way through the design of the development. Despite strength of national policy regarding flood risk, it does have some weaknesses/ ambivalence towards certain	National policy is generally strong regarding when FRAs are to be expected and how they ought to be completed. Policy is also strong regarding how flood risk ought to be addressed by new development. This could result in some repetition.

	situations, for example how FRA is to be applied to extensions, and local policy can provide greater certainty regarding our expectations.	
Option c Prevent self-contained basement flats in areas at risk from fluvial flooding.	There is a higher level of risk to life in self-contained basement flats than in basement accommodation more widely when in areas of flood risk. This policy approach would make self-contained basement flats unacceptable in such an area.	Could reduce opportunities for development of sites which are otherwise in accordance with national policy and where risks could be largely addressed through specific mitigation measures. Such development is already prevented by national guidance in Flood Zone 3 and subject to an exemption test in Flood Zone 2, so a specific option would not be considered necessary.
Option d Prevent culverting of open watercourses.	Culverting of open watercourses can introduce additional flood risk in the local area due to potentially throttling water flows during heavy rainfall events as well as risks of blockages during storm events that can exacerbate flooding. It can also have detrimental effects for the quality of the watercourse, removing habitat and harming local species.	Could reduce opportunities for development of sites if the open watercourse cannot be incorporated into the scheme.
Option e Allow only water compatible uses and essential infrastructure in undeveloped Flood Zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within Flood Zone 3b, with high standard of	Allowing only water-compatible and essential infrastructure in undeveloped flood zone should not increase flood risk elsewhere or result in unnecessary net loss of functional floodplain.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of

mitigation, where built footprint of a site is not increased and where risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposals would conflict with safe access and egress requirements, they would be refused.	In Oxford there is much existing (and historic) development in areas of flood risk; it is important that those existing properties can be improved/ reused/ redeveloped to make efficient use of land. This approach would provide for careful regeneration of existing development sites but limiting further changes in built footprint should help to ensure no increase in flood risk elsewhere (with potential for improvement). Also, encourages use of brownfield land over developing on greenfield sites and can allow development close to where people already live.	water; create or increase any risks for occupants, or of flooding elsewhere. The policy would need to provide clarity on what constitutes the built footprint of a site and what conditions are acceptable under the policy – e.g. if the footprint remains the same, is it acceptable to be relocated within a site?
Option f Allow only water compatible uses and essential infrastructure in undeveloped Flood Zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within Flood Zone 3b, no restriction on built footprint change if risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposals would conflict with safe access and egress requirements, they would be refused.	Greenfield sites are likely to have a role as flood storage, and this option would preserve this function and help to ensure no increased flood risk elsewhere. Exemptions could be possible for specific allocated sites where the required evidence has been gathered at the Local Plan stage to support this.	This policy could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not shift flood risk elsewhere, and is in accordance with the NPPF.

Option g Prevent development of greenfield sites within Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).	Same positives as above for option b, except this option allows for a greater use (e.g. densification) of site compared with option a - as long as design of development ensures flood risk is ultimately reduced compared to pre-development.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of water; create or increase any risks for occupants, or of flooding elsewhere. A demonstrable reduction in flood risk alongside an increase in built footprint could be very difficult to achieve in practice.
Option h Do not include a policy about flood risk but rely on national policy instead.	Simply relying on national policy could be easier for developers to understand and work with. National policy on flood risk is fairly developed and well tested and may ultimately be transferred into National DM policies.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.

623

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, or Option a+ combination of all or some of Option b, Option c and Option d, with either Option e or Option f or Option g. Option h is an alternative option to Option a.

High-level screening conclusion? The options are similar to each other from a sustainability perspective. National policy already provides a strong framework for managing flood risk, however the additional options proposed on top of national policy are seen as necessary due to local context.

Screened in for detailed appraisal? No

Rationale:
Options a and h are alternative options. Option a reiterates national policy and provides more detail where there is less certainty within national policy such as for extensions, whereas Option h does not have a policy and just defaults to national policy. Options b, c and d are all additional options which seek to set out key principles to consider for extensions in Flood Zone 3b; to prevent self-contained basement flats in areas at risk from fluvial flooding; and to prevent culverting of open watercourses respectively. Option e would allow limited development on brownfield land within Flood Zone 3b, where the built footprint of the site is not increased and where flood risk is demonstrably decreased and where safe access and egress requirements are mandatory. Option f is similar to Option e, except it would not restrict the size of the built footprint of the development. Option g goes further than either Options e or f as it prevents development of greenfield sites in Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).

In terms of sustainability impacts, **criterion 2. Climate resilience** is the most relevant. Most of the options would score positively against this criterion as they seek to manage flood risk, albeit in different ways, for example, whether it's addressing extensions in Flood Zone 3b (Option b) or preventing culverting of watercourses (Option d), or providing more detail than what is contained in national policy (Option a). The extent of the positive impact of these options will be dependent on the implementation. The only option that would score neutral is Option h as it would proposes no policy and defers to national policy. Some of the policy options would impact **Criterion 3. Efficient use of land**. Options e or f would have a minor positive impact as they both seek to allow limited development on brownfield land within Flood Zone 3b, which minimises the use of greenfield land. Depending on implementation, Option g would score neutral against this criterion, as although it wouldn't allow development on greenfield Flood Zone 3a, this more restrictive option might limit sites that could be allocated for development, where land is already constrained. Option d might even score positively against **Criterion 10. Biodiversity** as not allowing watercourses to be culverted, not only reduces flood risk (water storage) but keeps the water naturalised, potentially allowing preferable conditions for biodiversity to flourish. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDs)

Table 5.2 - Policy options set 007b: Sustainable Drainage Systems (SuDs)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require SuDS on all new developments (including minors), unless this is shown not to be feasible, and include guidance on how they should be implemented. Incorporate hierarchy style approach to SuDS design, prioritising green SuDS and maximising multi- functionality.	Greener solutions have multiple benefits – so these can be maximised where green SUDs are prioritised for in the first instance. Same benefits as Option b but with more detailed specifications on the type of SuDS to be implemented, with a priority given to green, natural features. Green, multi-functional SuDS can contribute to wider placemaking and have a variety of benefits that extend beyond water management, including improving water quality, reducing urban heat, promoting biodiversity and better placemaking.	Some sites may not be able to accommodate green solutions. Whilst well-designed SuDS can deliver multiple benefits, this should not come at the cost of their role as flood risk mitigation where this is required – potentially this could be complicated by seeking to deliver wider multi-functionality particularly where inappropriately designed. Additional management/ maintenance requirements for green SuDS would need to be factored into design and cost of schemes.
Option b Require SuDS on all new developments (including minor household applications), unless this is shown not to be feasible, and include guidance on how they should be implemented.	Some sites might only be able to accommodate limited 'grey' drainage measures (e.g. tanks). This approach would ensure that new development include SuDS wherever possible and set out guidance for how this ought to be designed.	Could lead to proliferation of 'grey' SUDs and miss out on benefits that greener solutions for SuDS design – e.g. making use of green infrastructure – can provide. SuDS may be more challenging to deliver on smaller sites where space is limited.

	SuDS can help to reduce risks of flooding, particularly during times of intense, heavy rainfall by capturing surface water run-off and reducing pressures on sewers. Sets out that SuDS would be required on minor schemes also (which are not addressed in national policy).	Would need to ensure that proposals are accompanied by appropriate infiltration studies.
Option c Do not include a policy about SuDS but rely on national policy instead.	There is a variety of industry guidance about good design for SuDS which could be utilised by developers. Equally the City Council could set out its expectations in the form of supporting guidance/ technical advice note.	Guidance in national policy about SuDS is limited in terms of 'good design' and regarding wider objectives (e.g. water quality), it also only addresses SuDS on major schemes. A local policy could be more explicit in terms of what is expected/ suitable for Oxford, including on minor applications. This option would arguably not address the local context of flood risk in the city and the need for all new development to address it.

626

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b or c are alternative to each other **High-level screening conclusion?** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** Options a, b and c are all alternatives. Option a requires SuDS on all new developments (including minors), prioritising green SuDS and maximising multifunctionality. Option b is similar to Option a except it doesn't prioritise green SuDS or multifunctionality, whilst Option c is not to have a policy and rely on national policy/ guidance instead.

In terms of SA impacts the options are most directly relevant to **criterion 2. Climate resilience** and both Options a and b would be a positive impact. Option a will also have minor positive impacts for **criterion 7. Green Infrastructure.** Potentially option b might also positively impact criterion 7 as well but it depends upon implementation, otherwise it would be neutral. Option c is expected to be neutral in impact for these criteria, as there is strengthened national policy guidance however this is lacking the detail that would help to steer the design of these measures to take account of local context. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

627

6. Conclusions including key sustainability issues

6.1 Oxford is challenged by flood risk from a range of sources which is likely to increase in the future in light of the projected impacts from climate change, therefore, flood risk will be an important issue for the new Local Plan. The city is highly constrained but also needs to accommodate new development into the future as the city grows, including to meet the city's ongoing housing need. The Local Plan will therefore need to balance competing development needs whilst ensuring that flood risk is appropriately mitigated and managed so that the health and wellbeing of residents and the wider sustainability of the city is not compromised.

6.2 By addressing flood risk, we can contribute to the social dimension of sustainable development by helping to preserve the health and wellbeing of residents who could otherwise be physically and mentally impacted by having their properties flooded. Addressing flood risk will also have economic benefits through avoiding costs from flood damage to properties and businesses and building up their resilience to future events, whilst it will also help to preserve the environment of the city, including sensitive habitats.

Key sustainability issues for the Local Plan to address:

- The Local Plan 2040 will need to take long term flood risk into account, including the impacts of climate change and how this could change flood risk in the city.
- Avoiding, managing and mitigating flood risk as part of new development includes ensuring that new development does not exacerbate flood risk, such as through hard surfaces increasing surface run off into sewers.
- There are links between flooding and human health (physical and mental) particularly in areas of the city that are most deprived.
- There will be residual risks of flooding after applying the sequential approach test to locating development and incorporating flood defence measures.

Preferred approaches for the Local Plan 2042

6.3 Section 5 identified that there were a couple of topics that the Local Plan 2042 could implement policy to address which relate to addressing flood risk and managing drainage on sites. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Flood Risk and Flood Risk Assessments - Draft policy G7

6.4 For the Local Plan 2042, the preferred approach is a combination of **Options A, B, C, D and E.** This will allow for a targeted policy that responds to various considerations and potential risks arising from the local context of flood risk in the city.

6.5 **Option A** helps to ensure national flood risk requirements are met but also provides more certainty around expectations for FRAs where national guidance is less clear, or where there are particular local issues that applicants need to consider. **Option B** would help to ensure that extensions in particular flood risk zones are informed by FRAs that meet particular requirements. **Option C** would prevent self-contained basement accommodation in areas of flood risk because of the particular vulnerabilities associated with this type of development and the risks for occupants. Meanwhile, **Option D** would prevent culverting which can incur additional flood risk due to constraining water flows during heavy rainfall events, but also have negative impacts for ecology and wildlife that rely on the watercourses.

6.6 **Option E** is considered to be an important response to Oxford's particular circumstances in relation to pre-existing development in flood risk areas. The option allows only water-compatible and essential infrastructure in the undeveloped flood zone, which should mean flood risk is not increased elsewhere or that loss of functional floodplain does not occur unnecessarily. However, the option also recognises that there is sometimes historic development located in areas of flood risk that could benefit from sensitive redevelopment in order to secure more sustainable futures for these sites, whilst also taking opportunities to address existing flood risk there. However, it will be important to ensure that strict requirements are set out in the policy for when this may be acceptable.

Sustainable Drainage Systems (SuDs) - Draft policy G8

6.7 For the Local Plan 2042, the preferred approach is **Option A**, which would mean requiring SuDS on new development and also incorporating a hierarchy style SuDS policy that steers applicants towards prioritising green SuDS measures first, before other 'grey' solutions are selected. This approach would help to ensure that surface drainage is managed appropriately, reducing strain on sewer systems and helping to build in flood resilience into sites.

6.8 This approach would also help to ensure multi-functional benefits can be derived from SuDS design by seeking to maximise green infrastructure features that can manage drainage whilst also providing other benefits for people and the environment. It would also complement the greening aspirations of other elements of the Local Plan. An approach of having no local policy, or not prioritising green features could risk missing opportunities for multi-functional features and applicants selecting less optimal drainage solutions for their sites.

Background paper 008

Carbon reduction and climate resilient design

This paper addresses carbon reduction in new development and how the Local Plan will support the city's transition to net zero carbon. The paper also addresses climate resilient design and adapting the built environment to the changing climate of the future.
Relevant Local Plan Objective(s): • Our city is ready for a net zero carbon future. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040. 2. To build resilience to climate change, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Climatic Factors, Air

1. Introduction 3

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

Other relevant plans/programmes/strategies 6

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 7

Primary sources of greenhouse gas emissions in the city 7

Carbon emissions associated with buildings in operation 9

Embodied carbon emissions during construction 9

Energy supply and grid capacity 11

Fuel poverty 12

Climate change risk and the need for adaptation 13

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 14

5. Options for Local Plan 2042 policies 15

Policy options set 008a (draft policy R1): Net zero carbon buildings in operation 17

Policy options set 008b (draft policy R2): Embodied Carbon 23

Policy options set 008c (draft policy R3): Retrofitting existing buildings including heritage assets 26

Policy options set 008d (draft policy G9): Resilient design and construction 31
6. Conclusions including preferred approaches for Local Plan 2042 35
6.1. Preferred approaches for the Local Plan 2042..... 36

1. Introduction

1.1 The Council has a legal duty, as set out in Section 19(1A) of the Planning and Compulsory Purchase Act 2004, to ensure that the new Local Plan includes policies that, taken as a whole, have been designed to secure action on climate change. This is reflected in national policy, which sets out that the planning system should help to: 'shape places in ways that contribute to radical reductions in greenhouse gas emissions', and that Local Plans should take a proactive approach to mitigating climate change. In recognition of the need to take action on climate change, the Council declared a climate emergency in 2019 and has committed to achieving net zero carbon emissions as a city by 2040.

1.2 Alongside the transport network, the built environment is a primary contributor to Oxford's carbon dioxide emissions, a potent greenhouse gas which is causing global climate change. The power used to heat and operate buildings, as well as the resources used within the construction process, all have a role in these emissions. In order to meet national and local commitments on mitigating climate change, it is essential that new development being built in the city is designed for a net zero carbon future, and that existing development is retrofitted to reduce its carbon footprint. It is also important that new development is designed to be resilient to the impacts of the changing climate – e.g. flood risk and overheating – which could be more common in future.

1.3 This background paper firstly sets out key context in the form of existing policy analysis, current situation in the city and the likely situation without a new Local Plan. It then goes on to discuss the key topics and options for policies that will need to be considered in the preparation of the Local Plan 2042.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

Climate Change Act 2008

2.1 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as in response to the Paris Agreement, most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels).

2.2 Under the Act, the government is required to set five-year caps on emissions (known as carbon budgets) twelve years in advance and publish its proposals and policies for meeting these budgets. Most recently, the sixth carbon budget enshrined a target of 78% reduction in carbon emissions for the period from 2033 to 2037, whilst the seventh carbon budget is expected to be set in 2025.

Planning and Compulsory Purchase Act 2004

2.3 Sets out the current structure for the English Local Planning framework and includes, within section 19 (as amended by the Planning Act 2008), the legal duty to ensure that, taken as a whole, planning policies contribute to climate change mitigation and adaptation.

Planning and Energy Act 2008

2.4 The Planning and Energy Act (2008) makes provision within Section 1 for a local planning authority to include policies within its development plan that require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations, provided these policies are reasonable, not inconsistent with national policies, and compliant with usual provisions around plan making as set out in section 19 of the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework (NPPF) (revised 2024)

2.5 Chapter 14 of the NPPF sets out the government's requirements for how the planning system should address the challenge of climate change, particularly paragraphs 161 to 169. For the first time, the updated wording in para 161 that opens the chapter now explicitly references the transition to net zero by 2050, stating that: The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It goes on to flag the need for shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, and conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

2.6 Para 162 sets out that plans should take a proactive approach to mitigating and adapting to climate change, footnote 53 clarifies that this should be in line with the objectives and provisions of the Climate Change Act 2008, which legislates for net zero carbon emissions by 2050. Para 164 (b) discusses the need for planning development in ways that help reduce greenhouse gas emissions, such as through its location, orientation and design.

2.7 Paras 165 flags the importance of securing energy from renewable sources and the role of plans in helping to enable this. In particular, it sets out the need for providing a positive strategy for energy from these sources; considering identifying suitable areas for renewable and low carbon energy and supporting infrastructure; and identifying opportunities for development to draw energy from such sources. Para 167 also highlights that significant weight should be given to the need to support energy efficiency and low carbon heating improvements to existing buildings.

National Planning Practice Guidance (PPG) including National Design Guide/Model Design Code

2.8 National guidance supporting planning policy is set out on the Planning Practice Guidance climate change webpage, although much of this now dates back to 2019 or earlier (with some sections dating to 2015). Whilst some of the guidance, including key legislation planners should take into account and general advice on climate change mitigation measures that could be applied through planning process are still of relevance, other sections appear to have been overtaken by recent policy developments (such as guidance around the 2015 Ministerial Statement as discussed below).

2.9 The National Design Guide (2019) which now forms part of the PPG includes guidance on what government considers to be 'good design' and breaks design down into 10 key topics. There is a section on "Resources" which sets out that "well-designed places and buildings follow the energy hierarchy" as well as containing some other general design guidance which can help local authorities with preparing more locally specific design guidelines.

Written Ministerial Statements on Plan Making (2015 and 2023)

2.10 There are two WMSs that have been published since the above legislation which have some relevance to the topic of energy and carbon, but also serve to confuse policy and local authorities' powers.

- The first, published in 2015, set out the expectation that local authorities should not set energy efficiency standards with requirements above the equivalent to level 4 within the withdrawn Code for Sustainable Homes. It should be noted that an update to Building Regulations during that same year meant that they had already superseded the old Code for Sustainable Homes standard.
- The more recent WMS, published in December 2023, indicates that Local Authorities cannot set their own targets based on actual energy use in buildings and dissuades them from going beyond national standards. It sets out that "*Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rational...*" Where policies are proposed that do go beyond national standards, the WMS sets out that these should be supported by viability evidence that shows development would remain viable, with a focus on housing affordability and supply. It also states that such policies should be expressed as a percentage uplift of a dwelling's Target Emission Rate (TER) calculated using the Standard Assessment Procedure (SAP) of Building Regulations.

Oxford Local Plan 2036

2.11 Policy RE1: Sustainable design and construction sets out the Council's expectations regarding carbon emissions in new development. The policy requires new development to achieve reductions in carbon emitted beyond those set out in national Building

Regulations. The targets are increased at intervals throughout the plan period, beginning at 40% reduction, before moving to 50% by 31 March 2026, and then zero carbon after 2030 (for residential development).

2.12 Other policies in the adopted Local Plan that have a role in contributing to reductions in carbon emissions in the city, include:

- Policies that encourage and enable sustainable/active travel and the transition to electric vehicles (policies M1 to M5),
- Policies relating to protecting and enhancing Oxford's green and blue infrastructure network (policies G1 to G8).

Other relevant plans/programmes/strategies

Oxford's climate emergency declaration and the Zero Carbon Oxfordshire Partnership (ZCOP)

2.13 In January 2019, Oxford City Council members unanimously declared a climate emergency and agreed to create a citizens assembly in Oxford to help consider new carbon targets and additional measures to reduce emissions. This was followed in February 2021, by signing the Zero Carbon Oxford Charter, and the creation of a new Zero Carbon Oxford Partnership (ZCOP) for the city along with the setting of a local target of achieving net zero carbon emissions as a city by 2040 (ten years ahead of the UK net zero carbon target). The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

2.14 The ZCOP has previously developed a Roadmap and Action Plan (published 2021) for the city which identifies the primary sources of carbon emissions in city at present and the key milestones that are needed in relation to decarbonising different aspects of life in Oxford in order to meet the net zero target of 2040. The roadmap highlights the large-scale changes and the challenging nature of the transition to full decarbonisation which is needed across various sectors, such as expansive retro-fit of existing buildings to decarbonise heating and increase fabric efficiencies, large amount of micro-renewable installation on rooftops to increase clean energy generation as well as ongoing increases in EV charging infrastructure to support decarbonisation of transport.

Future Homes/Buildings Standard – Building Regulations reforms

2.15 Outside of the planning system, a review of national Building Regulations has also been ongoing with staged plans to implement the Future Homes Standard (dealing with residential development) and Future Buildings Standards (non-residential development). These reforms to the technical requirements within Building Regulations are intended to deliver higher standards of energy efficiency and carbon reduction across all new buildings through Building Control process. The first stage of these reforms came into effect in 2022 and was presented as an interim uplift to Building Regulations that would result in homes producing 31% less CO2 emissions compared to current standards. It also

included updates to other technical standards such as on ventilation, the performance gap, overheating and EV charging.

2.16 Further changes, expected in 2025, will result in new homes producing at least 75% lower CO2 emissions than those built to previous Building Regulations standards, as well as being 'zero carbon ready'. This means that, even if the new buildings are still emitting some emissions, these should reduce to zero over time (e.g. with the continued decarbonising of the energy supply sourced from the national grid as fossil fuels are phased out of the system). The reforms only affect the performance standards of buildings that are addressed by Building Control (e.g. regulated energy systems), meaning the current proposals would not deliver full net zero development, nor address embodied carbon/energy.

Oxfordshire Climate Vulnerability Assessment (2024)

2.17 The County Council have produced a climate risk vulnerability assessment for the county which identifies how climate change could impact various sectors within Oxfordshire. The assessment identifies the city as being an area with increased climate risk to hazards such as overheating and flooding, both now and in the future.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Primary sources of greenhouse gas emissions in the city

3.1 Analysis of the greenhouse gas emissions that are generated across the city is challenging with varying estimates depending upon the methodology and data sources used. The Department for Energy Security and Net Zero (formerly BEIS) publish statistics on per capita emissions yearly and these show an overall trend of reducing per capita emissions for Oxford since 2005, as can be seen in Figure 3.1.

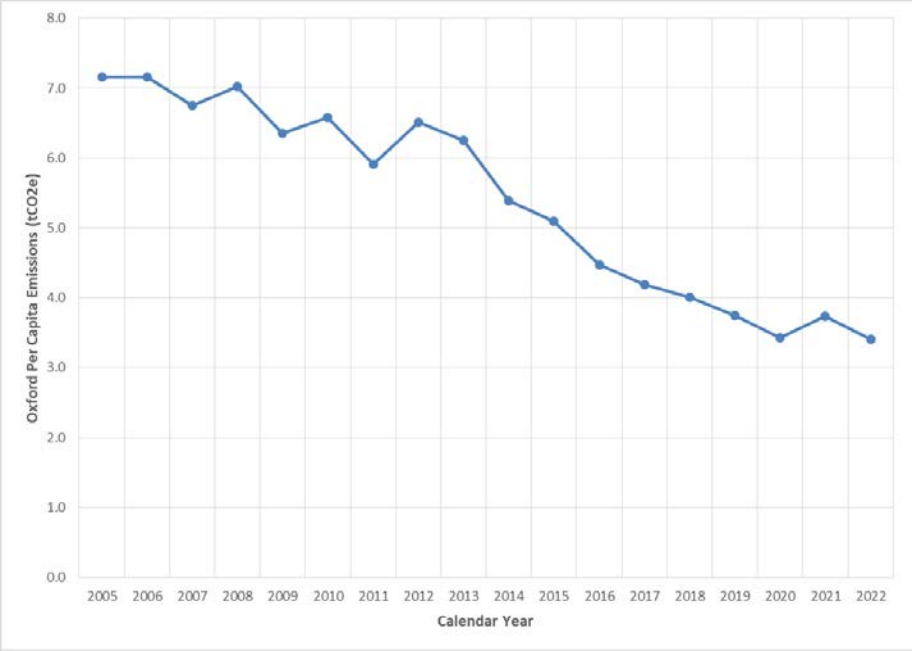

Figure 3.1 - Per capita emissions of carbon dioxide (tCO2 equivalent) for Oxford according to Local Authority Greenhouse Gas Emissions statistics (2005-2022) Sourced from the Department for Energy Security and Net Zero statistical release (June, 2024)

3.2 The underlying summary accompanying the statistics above highlights that the national pattern in declining emissions, which the city's own performance tracks with, has largely been due to reductions in emissions from power stations and industrial combustion. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a large reduction in the amount of coal, which is a carbon intensive fuel, and increasing use of renewables. A small increase in emissions was noted in 2021 for the majority of Local Authorities, including Oxford, due to COVID-19 restrictions easing and colder temperatures in that year increasing the use of heating in buildings. For the most recent statistical release (2022), per capita emissions for the city had decreased in line with much of the rest of the country. The national decrease in emissions associated with 2022 was attributed largely to milder weather reducing heating demands and potentially the impact of higher energy prices.

3.3 The Zero Carbon Oxford Partnership's Roadmap and Action Plan (2021) identified the key sources of emissions in Oxford as part of its work in defining a roadmap to net zero by 2040. This was an assessment of all greenhouse gas emissions across the city (not just carbon, as is highlighted in the government data above) and drew upon data from both BEIS and from the SCATTER cities tool as well as local sources, to produce a sector-by-sector breakdown of emissions in the city. Whilst the baseline data informing the analysis is now a few years old (2018 was the baseline year), the sector-by-sector profile as shown in Figure 3.2 clearly highlights the major impact of the built environment on emissions, with buildings being the primary source of emissions resulting from the city, and this is not

considered likely to have changed in the intervening period. Transport was the second largest contributor though this is a much smaller proportion of emissions as a whole.

Figure 3.2 - Sector-by-sector greenhouse gas emissions in Oxford (2018 baseline year as used in the Zero Carbon Oxford Partnership Action Plan)

Carbon emissions associated with buildings in operation

3.4 As the ZCOP work notes, the primary reason for the major contribution buildings are making to Oxford's carbon footprint is the use of fossil fuels for heating. However, other sources within buildings include gas used for cooking, as well as emissions associated with electricity use (where this is not sourced from renewables). The majority of the emissions associated with buildings are from buildings that are already in existence. This flags a significant need for retro-fitting to happen alongside ensuring that new development does not exacerbate the problem.

3.5 The Building Regulations reforms embodied through the Future Homes and Future Buildings Standards (as discussed in section 2) should help to ensure new buildings make a much smaller contribution to this existing carbon footprint. Until grid energy is decarbonised, however, where these buildings rely on power from the national grid for their operation then there will still be some associated emissions from them without applying further standards via local policy.

Embodied carbon emissions during construction

3.6 The carbon associated with buildings in operation is not the only source of emissions that need to be addressed as the city moves towards net zero carbon by 2040. There is an embodied carbon cost of the materials used in the built environment in the construction,

maintenance, redevelopment and demolition processes. Carbon dioxide can be emitted in various ways as part of the processes but equally, carbon can be sequestered through careful design choices (e.g. use of natural materials like wood). As operational energy becomes zero carbon, the embodied carbon cost of new development will become the primary source of emissions that needs to be addressed and this will be a growing area of focus in future years.

3.7 Addressing the issue of embodied carbon is closely tied with the concept of a circular economy (Figure 3.3). The Low Energy Transformation Initiative (LETI), in its Embodied Carbon Primer, define the circular economy as a system that is 'restorative or regenerative by intention and design'. In this regard, products, buildings and systems are designed in a way that considers not only how these can be repaired and reused easily, but also how the energy and materials used to construct them can be remanufactured and recycled at the end of their life. This approach enables reductions in the raw materials we extract from the environment over time, our energy demands and the impacts we have upon the wider environment, and by extension, carbon emissions associated with the construction process.

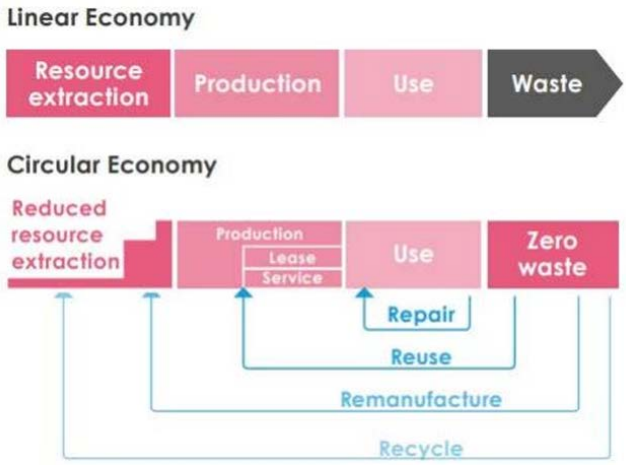

Figure 3.3 - The stages of a linear economy versus a circular economy (source: LETI Embodied Carbon Primer)

3.8 But embodied carbon is an even more challenging and complex aspect of net zero carbon design to address than operational carbon. There is much ongoing research and emerging guidance with varying levels of understanding at present in relation to the different stages of a building's life cycle. As UKGBC note, most of these embodied emissions occur early during the construction stage and this is typically the focus at present. Perhaps reflecting the emerging nature of this topic, it is not currently addressed through a consistent set of national standards, though this is something that has been repeatedly called for through an amendment to Building Regulations as highlighted in this recent House of Commons Committee report.

3.9 The emerging nature of our understanding of the topic and how to effectively address it makes formulating policy challenging, particularly because there are many difficult

questions that the development management process must grapple with when considering embodied carbon and how it is balanced with other place-making objectives, and there are not always definitive answers. For example:

- Is it more sustainable to retain an energy inefficient building or demolish to provide a highly energy efficient replacement?
- How should we balance out the benefits of long-life materials that may have a high carbon cost to produce, as opposed to shorter lived materials which will need replacement more quickly but have a low carbon cost to produce?
- How do we balance out issues of carbon reduction alongside other important choices in delivering high-quality design that contributes to making the places we wish to see in Oxford?

Energy supply and grid capacity

3.10 Across the UK, there are national trends in new sustainable technologies which are of increasing popularity and that also form important context to the new Local Plan policies. The uptake in electric vehicles has been growing, leading to increased demand for EV charging infrastructure. Equally, we are seeing increasing uptake in electric solutions for heating our properties instead of fossil fuel burning boilers, such as Air Source Heat Pumps. The uptake in these technologies is likely to continue and most likely speed up and will result in increasing demands for electricity and increased pressure on the national and local energy grid infrastructure.

3.11 The Oxfordshire Energy Strategy (2018) and associated delivery plan (2019), supported by the Stage 1 work of the Oxfordshire Infrastructure Strategy (OXIS) commissioned by the Oxfordshire local authorities, previously identified that the electricity grid across the county is already constrained. The OXIS work concluded that annual electricity consumption across the county to 2040 is expected to increase due to three reasons: continued increase in the number of domestic and non-domestic buildings; the transition to electric vehicles; and the decarbonisation of heat. These factors will not only increase annual consumption but will also increase peak demand and will necessitate ongoing work by the Distribution Network Operators to meet future demands through upgrades and reinforcing of the grid so that constraints can be reduced and additional generation capacity (e.g. solar PV) incorporated. Whilst this work is some years old now, the high-level messages about future needs are unlikely to have changed, though there is emerging work such as Local Area Energy Planning across the County and an updated OXIS emerging which may update this picture in due course.

3.12 Looking beyond Oxford, the current Government has recently published an action plan for meeting a target of securing a clean power grid by 2030 (in advance of the previous 2035 commitment) as it seeks to ensure that the majority of the country's energy demand is generated by clean, renewable sources, backed up with gas only during generation shortfalls. National decarbonisation actions to date have already supported reducing per capita emissions in the city, which is likely to continue, however, it seems reasonable to hold a 2030 or 2035 net zero target with some caution. Recent assessments have

highlighted that the pace and lack of investment to date has put targets for decarbonisation of grid in doubt, for example, the Climate Change Committee flagged multiple uncertainties based on lack of strategy and direction for rollout of renewable energy generation. In their most recent 2024 report to parliament, they continue to note that pace of delivery in rollout of renewable energy capacity needs to increase radically if net zero targets are to be achieved. A new 2030 clean power target suggests this required increase in pace is even more pressing.

Fuel poverty

3.13 The Oxfordshire Joint Strategic Needs Assessment (JSNA) defines a household as being in fuel poverty if:

- they have a fuel poverty energy efficiency rating (FPEER) of band D or below; and
- if they are to spend their modelled energy costs, they would be left with a residual income below the official poverty line.

3.14 Three factors therefore affect fuel poverty: household income, fuel prices and household energy consumption. Buildings that demand a lot of energy to heat and run, combined with high energy prices (e.g. as has been seen subsequent to global instability in face of crisis like war in Ukraine and covid recovery), and pressures on household incomes can serve individually and cumulatively to exacerbate fuel poverty.

3.15 The Oxfordshire JSNA identifies that Oxford City is significantly worse than the Oxfordshire or regional averages on fuel poverty, whilst the other Oxfordshire districts are each significantly better than average (Figure 4). The 2024 update, which reports on 2021 and 2022, indicates that fuel poverty worsened across the county including in Oxford with its score increasing from 10% to 11.2% (+1.2%). The picture of fuel poverty within the city is unequal; there are twelve areas in the city with more than 10% of their households in fuel poverty, with the highest proportion (East Central Oxford) and lowest in (North Central Oxford) (Figure 3.4).

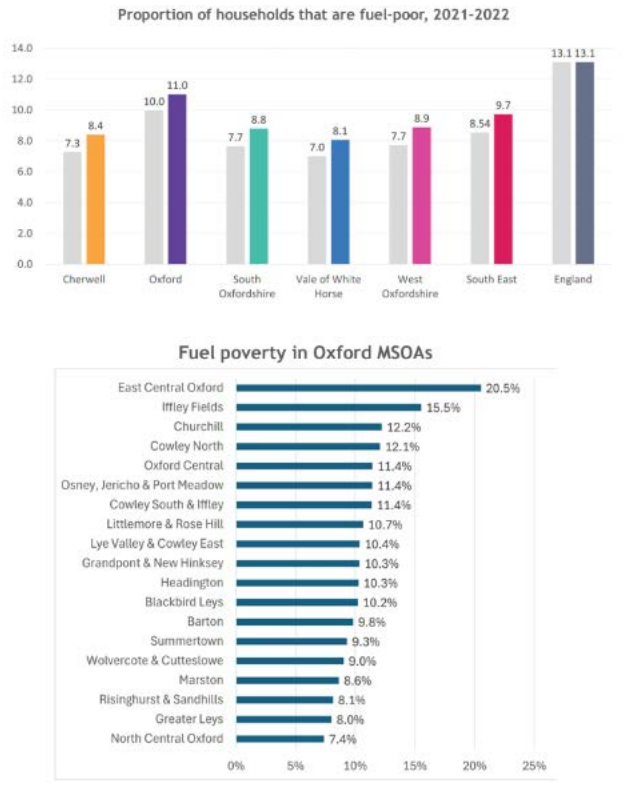

Figure 3.4 - Percentage of households in fuel poverty across Oxfordshire in 2021 and 2022 (top) alongside a breakdown of fuel poverty across different parts of Oxford in 2022 (bottom) (source: Joint Strategic Needs Assessment 2024)

Climate change risk and the need for adaptation

3.16 The impacts of greenhouse gas emissions such as carbon dioxide are in exacerbating the global problem of climate change, however, even if emissions were to be cut to zero today, the climate would continue to change because emissions in the atmosphere will persist for some time. The risks from climate change such as milder, wetter winters; coupled with increasing periods of intense and prolonged rainfall; as well as hotter, drier summers, will impact everyone in Oxford, but could be especially pronounced for more deprived communities and those living in poor health (as is discussed further in the health and wellbeing background paper).

3.17 Oxford has various characteristics that lead to climate change risks. A significant amount of land is exposed to flood risk from the two rivers, and other water courses running through the city. Despite areas of abundant green space, other areas are intensely urbanised and lacking in any green features, reflecting the constrained nature of parts of the city which brings additional challenges. For example, water runs off these artificial surfaces easier and there is less storage available in the form of green features and soils which can exacerbate flood risk (e.g. surface water flooding or overwhelming drainage systems). Also, the lack of green features exposes the city to additional overheating risk and the urban heat island effect as artificial surfaces absorb and reradiate heat, shading is reduced and the natural cooling effects of vegetation are reduced.

3.18 Recent research by the Oxfordshire County Council as part of their County-wide Climate Vulnerability Assessment 2024 identifies Oxford as having some of the most at risk areas in the county for future climate change in respect of flooding and heat waves. The assessment highlights that confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymeade, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas.

3.19 The picture is similar for flooding, with the county work identifying a number of wards in the city as being in the top ten with highest flooding risk at present (Blackbird Leys, Holywell, Hinksey Park, Littlemore, Marston and Northfield Brook). The subject of current and future flood risk is explored further in the Flood risk background paper and will be an important factor in the updated Strategic Flood Risk Assessment.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 In the absence of a new local plan, the existing Oxford Local Plan 2036 policies would continue to apply. Policy RE1: Sustainable design and construction, sets out the carbon reduction requirements that proposals for new-build residential developments and new-build non-residential developments of 1000m2 or more need to demonstrate through submission of an energy statement. At time of writing, this requirement is a 40% reduction over the current Building Regulations baseline.

4.2 However, Policy RE1's requirements are not fixed over time, instead, they step up and require an increase in carbon reductions against the current Building Regulations baseline in 2026 and 2030 for residential developments, and 2026 for non-residential developments. The policy ultimately requires Zero Carbon homes from 2030, although this requirement does not apply to new build non-residential developments and as such the requirement for those types of development the expectation would remain at a 50% reduction from 2026 onwards.

4.3 Policy RE1 applies only to regulated carbon emissions, excluding those unregulated emissions from any policy requirements. Meanwhile, the policy is also very limited in setting requirements in relation to actions that can reduce embodied carbon emissions within the construction process. Additionally, the Local Plan has minimal control over existing buildings and cannot force through owners to undertake retro-fit works, which will leave the existing retro-fit challenge to be addressed in other ways.

4.4 Beyond the plan period (past 2036), in the absence of a new local plan, the policies for planning in national planning policy as set out in the NPPF would take on increasing prominence. Whilst recent updates to the NPPF highlight the role of planning in supporting transition to net zero carbon, there is no specific requirement for net zero carbon development despite the national legislated target of being a net zero carbon country by 2050.

4.5 Of course, if the proposals are progressed as previously consulted on, then national standards set through Buildings Regulations are expected to become tighter in future with the introduction of the full Future Homes and Future Buildings Standards. This will support further reductions in some emissions associated with new development. As touched upon earlier in this paper, these proposed updates however do not currently address the full operational energy demands of buildings, ignoring unregulated energy loads not controlled through Building Regulations and associated with up to 50% of energy demand in a new building. They also do not address embodied carbon/energy. As these elements are also not touched by Local Plan 2036, the emissions associated with them would remain unaddressed without a new Local Plan.

4.6 Nationally, we are likely to see continued drop in emissions related to grid electricity used in development in line with the government's clean power target of 2030, which is ahead of previous 2035 net zero grid commitments. However, the national scale rollout of renewable energy generating technology needed to support a net zero grid has, to date, suffered from lack of strategy and investment at the required pace to achieve such targets.

4.7 In the short term at least, without additional mitigation measures in place to address emissions from new development via a new Local Plan, then any additional growth can be expected to result in an increase in emissions.

4.8 In relation to climate change risk. The impacts of climate change are likely to continue to be felt, even with radical reductions in greenhouse gas emissions, but could become more severe if trends in emissions do not reduce. The Oxfordshire Climate Vulnerability Assessment 2024 indicates that six of the city's wards which were discussed in the last section remain in the top ten at risk from overheating for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county) and five remain in the top ten for flooding (Holywell and Hinksey Park are replaced by other wards in the county).

5. Options for Local Plan 2042 policies

5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 should include several policies to address the topics of carbon reduction and net zero carbon development. This will not only be important for delivering upon the Local Plan 2042 objective of ensuring that the city is ready for a net zero carbon future, but also for helping to meet city and national climate change targets for achieving net

zero. The Local Plan 2042 therefore includes proposed policies in response to three topics:

- Ensuring new buildings in operation are net zero carbon.
- Ensuring new development reduces embodied carbon in the construction process.
- Enabling and supporting the retro-fitting of existing buildings, including heritage assets.

5.2 Additionally, it will be important for the Local Plan to have policies that drive more resilient design that is better adapted to the changing climate in future. There is overlap in this matter with various other topic areas, such as the need for greening (discussed in the green infrastructure background paper), flood risk policies (see flood risk and SUDs background paper 007) and policies driving healthy design (see health and wellbeing background paper 010). As such, these specific topics are not repeated here, but an overarching resilient design policy is proposed which can draw in design considerations touching on these various policy areas, and options for this are set out in this paper.

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 008a (draft policy R1): Net zero carbon buildings in operation

5.5 It is clear that the built environment contributes overwhelmingly to Oxford's existing carbon footprint as existing buildings contribute to emissions arising from the energy used to heat and power them. New buildings coming forward in the city will only add to these emissions unless they are designed to operate as net zero carbon buildings (which do not emit net additional carbon dioxide emissions in order to function).

5.6 Whilst the current Local Plan already requires improvements in carbon dioxide emissions over national building regulations standards, the current requirements do not ask for net zero carbon design. National buildings regulations are expected to be updated in future, and require net zero carbon ready development, but these will not deliver true net zero carbon buildings in operation (because Building Regulations does not address all energy sources in a building – only 'regulated' energy sources).

5.7 The options for policy that have been considered for LP2042 therefore relate to how much further local standards should go beyond what is asked for in national building regulations now or in future. They also include whether or not to allow for offsetting on trickier sites.

Table 5.1 - Policy options set 008a Net zero carbon buildings in operation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Specify design in accordance with energy hierarchy principles (including fabric-first) for all new development **and** permit no fossil fuel use in new buildings.	Designing in accordance with the energy hierarchy will help to ensure buildings are as efficient as possible from the ground up. Energy use is the primary source of carbon emissions from buildings in operation, tackling this will support carbon reduction but also potentially help address issues of fuel poverty and reduce demand on the wider energy grid. Preventing any additional fossil fuel combustion heating systems will help to reduce the need for retrofit later. This	Different types of application will have varying opportunity to apply the energy hierarchy – for example, it may be easier to take a fabric first across a new self-contained dwelling, compared with an extension to an existing dwelling. This could add complexity or confusion in the design process. There may be circumstances where there is a need for relying on fossil fuel systems – potentially where grid constraints are unable to support fully electric systems for example.

	could also ensure that new development does not contribute further to air pollution, including NO2 levels, but also Particulate matter levels (PM) in the city. Direction of travel, including previous updates to Building Regs already (and will further) disincentivizes fossil fuel systems like gas boilers. Policy would lock in local commitment and ensure all new development accords with it from adoption of the plan.	Equally, there may be opportunities for future technology advances to enable the transition of fossil fuel systems to cleaner sources (e.g. infrastructure and gas boilers being upgraded to function using hydrogen), although this is highly uncertain.
Option b **Mandate net zero carbon in operation (applying to <u>regulated</u> energy only)** from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation. Set targets for: • regulated energy use in the building, and • energy use associated with space heating, and • this energy use to be met through equal amount of new renewable energy generation (ideally onsite). Encourage net zero unregulated energy to be addressed as part of overall approach where possible (e.g. seek opportunities to reduce, and to meet	Regulated energy use is a well understood area of operational energy consumption and there is good understanding about how to decarbonise it. It is currently addressed as part of Local Plan 2036 so would keep in line with current practices. Assessing net zero carbon performance using an Energy Use Intensity (EUI) calculation would measure energy use as recorded at the meter and is more reflective of performance. Measuring via EUI instead of traditional carbon % reduction targets allows for better comparisons of performance between buildings also. Policy would still encourage developers to address unregulated energy where	The option is not in line with the government's current policy guidance for Local Authorities. A more prescriptive policy, with specific targets could limit innovation and become outdated more quickly, whilst also making for an overly technical policy. It may be difficult to set targets that are realistic for the range of building types that could come forward under non-residential development (e.g. schools, offices, warehouses etc). Encouraging net zero unregulated energy through the policy would not be as strong of a requirement as requiring it.This could have implications for power grid capacity considering expected increasing

through additional renewable generation capacity).	possible, which may secure some additional benefit for energy use/emissions associated with thus type of energy use, but would not make it compulsory.	demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing climate change, or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.
Option c **Mandate net zero carbon in operation (applying to <u>regulated and unregulated</u> energy)** from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as primary calculation. Set targets for • total energy use (regulated and unregulated) in the building, and • energy use associated with space heating, and • this energy use to be met through equal amount of new renewable energy generation (ideally onsite).	Similar positives to option b, however, option c would resemble a more reaching policy encapsulating decarbonising of unregulated energy sources also. Unregulated energy can be a significant component of the total operational energy use of a building and it will need to be decarbonised in the same way as regulated energy in order to meet future net zero targets. This option would seek to ensure unregulated energy needs are met through sufficient on-site generation wherever possible, potentially reducing demands for power from the main power grid. This policy option is considered to be the most well-aligned with the measures needed to accord with the city's 2040 Net Zero Carbon target (and roadmap/action plan) as well as the national net zero	Similar negatives to option b, however, option c is likely to be much more challenging. Again, the option is not in line with the government's current policy guidance for Local Authorities and strays further in scope (than option a). Unregulated energy use is predominantly determined by occupant behaviour within the building once in operation, something that planning policy and the design/ construction process has limited influence on. There could be particular challenges for high energy demand, non-residential uses, such as healthcare and research (such as labs) with bespoke equipment needs central to their operation. Some flexibility may need to be built into targets used in such a policy. More constrained sites and/or certain buildings (e.g. with limited roof space)

	2050 target. It should help boost micro-generation of renewable energy across the city and mitigate need for future retro-fitting. It also accords with the majority of industry guidance for designing to net zero carbon in operation e.g. (LETI, BRE GROUP etc).	may struggle to meet unregulated energy demands through on site renewables and may be pushed towards other forms of offsetting.
Option d **Mandate 'net zero ready' buildings, in line with the principles in the proposed Future Homes/Buildings Standard (which apply to regulated energy only)**. Measure compliance via national Building Regs calculations (e.g. SAP/ SBEM) demonstrating carbon reduction over notional building. Encourage net zero unregulated energy to be addressed as part of overall approach where possible. (e.g. seek opportunities to reduce, and to meet through additional renewable generation capacity)	This approach represents a less advanced one to options b and c but would be closer to the direction of travel outlined by central government in its consultations on the Future Homes/Buildings Standard. It would mandate the requirement for net zero ready homes from the Local Plan's adoption, even if the national standards are delayed or watered down and would seek to ensure that no further retrofit is needed to new developments in the future to bring them to net zero as the national grid decarbonises. Recognising that the proposals set out in FH/BS do not currently address unregulated emissions, this policy would still encourage developers to address unregulated energy through ensuring sufficient on-site renewable energy generation and to demonstrate this via submission of EUI calculations.	Net zero ready development as currently set out in the Future Homes/Buildings Standard does not address total operational energy of buildings and would omit emissions associated with unregulated energy. Development built to this standard would not be net zero in terms of regulated energy until the national grid has fully decarbonised either, thus would be responsible for continued emissions. Encouraging net zero unregulated energy through the policy would not be as strong of a requirement as requiring it.This could have implications for power grid capacity considering expected increasing demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing climate change, or achieving local (2040) or national (2050) net zero goals,

		particularly where national grid takes longer to decarbonise.
Option e For challenging typologies of development that have exhausted all onsite options to meet operational energy demand in line with other policy requirements, accept offsetting as a way to mitigate impacts through paying to provide offsite retrofitting to existing buildings elsewhere. Set out strict principles for how/when this would be accepted including that this option is **a last resort**. This would be framed as 'energy offsetting' (rather than carbon offsetting) and tied to the energy calculations of demand versus generation for the development.	Due to the constrained nature of many sites in the city, it may be difficult to incorporate technologies such as renewables onsite (or find spaces offsite) to balance out energy use, thus offsetting may be necessary. It could be an option where all other approaches are exhausted. Collection of an offset fund could potentially create a pot of money which could be utilised to deliver carbon reduction measures elsewhere in the city (e.g. existing buildings in need of retrofit).	There is the risk, as evidenced elsewhere with similar schemes, that offsetting could be more attractive than delivering onsite measures leading to poorer performing buildings. Offsetting shifts the problem of carbon emissions elsewhere and does not address the real need to deliver truly net zero buildings from the beginning. Offsetting projects would need to be identified, resources would need to be found to monitor their delivery, manage the fund, and ultimately ensure a 1-to-1 offset in carbon emissions between the project and the contributing development.
Option f Set no local standards on net zero carbon design of new buildings. Conform with the approach advocated by the Written Ministerial Statement 2023 and rely on national standards set out in Building Regulations, including the upcoming uplifts associated with Future Homes/Building Standard which is envisaged to deliver 'net zero ready' development from 2025 onwards.	Similar to option d but not setting any expectation/local direction on net zero carbon design standards. This option would mean greater consistency for developers building in Oxford compared to elsewhere and less complexity in the planning application process. At the design stage, regulated emissions are the primary area that can be influenced thus Building Regs process could achieve this.	This approach ignores the local context of Oxford, such as its 2040 local net zero carbon target. Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed (at time of writing the results of the last consultation on the options it proposed have not even been released). Even when in place, the updated building regs will not deliver net zero carbon until

		the grid is decarbonised, it will also not address unregulated/embodied carbon (in its current proposed form). Ultimately, this option would be even more likely (than other options) to risk the city not meeting its targets in addressing climate change or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various options/combinations e.g. A+B, A+C, A+D, E, F **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** In terms of options, it would be appropriate to consider having a policy or not as there is no specific NPPF demand either way, though local context supports the inclusion of some sort of policy, the considerations then are how far such a policy goes in requirements. The options that the Council has considered represent various approaches to setting policy for new development to deliver upon net zero carbon in operation through use of various combinations of requirements relating to: types of energy addressed (e.g. regulated or unregulated); use of specific targets for energy use (space heating and total); requirements for renewable energy generation; as well as the methodologies for calculating performance (e.g. SAP or EUI). Whilst options b, c, d and f, represent four alternative approaches, some of the options (options a and e) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside one of the other options, as with option e (offsetting) which is less likely to stand alone. In terms of sustainability impacts, the different options all relate primarily to levels of mitigation that the Local Plan could ask for in relation to new developments' energy use and carbon emissions and would be assessed against similar criteria within the SA assessment framework – particularly criteria **1. Carbon emissions**, **2. Resilience to climate change**, but also potentially **5. Inequalities** (because of potential influence on fuel poverty) and **11. Urban design** (because higher standards may push towards more standardised design styles/shapes in buildings and limit design innovation). As the differences between the options are

essentially in how they propose to technically implement net zero carbon design, as well as in how far they push in terms of standards applicants must meet, there would be some variety in the extent of any impact each option would incur against the SA criteria – particularly the extent of positive impact under criteria 1. 2. and 5. and variation between neutral or minor negative impact under criteria 11. (because as standards get stronger and potentially limit design). Option f would mean no local policy requirements, however, this is likely to still be accompanied by some positive impact for criteria 1. 2. and 5. because of the expected tightening of national building regs to move new development towards being net zero ready, although the positive impact is going to be reduced and would take longer to begin to take effect (it is likely to be negative/neutral in the immediate term). Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 008b (draft policy R2): Embodied Carbon

5.8 In addition to the carbon dioxide emissions related to a building whilst it is in operation, there is also an upfront embodied carbon cost associated with constructing them as was touched upon earlier. Embodied carbon in construction can be influenced by a wide range of factors, from the types of materials used in construction, to where these are sourced from and how they are processed, making this topic a highly complex one, subject to various considerations. As set out in Section 3 of this paper, the balance between addressing embodied carbon and achieving other place-making concerns in the planning process is not always clear either.

5.9 The stronger and more explicit a policy is, the more challenging it could be to implement, particularly as national guidance and industry understanding is still emerging. Nevertheless, whilst the current Local Plan is not explicit in requirements to reduce embodied carbon, it is important that development at least begins to consider and take action to address this topic in order to mitigate impacts on the wider environment and climate change. The options for policy relate to how far the Local Plan 2042 should go in requiring applicants to address embodied carbon.

Table 5.2 - Policy options set 008b: Embodied Carbon

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include high level principles for limiting embodied carbon, including the	A strong set of principles for addressing embodied carbon (an area where industry guidance/learning is more limited	This is an area of evolving guidance and understanding and broad principles could be difficult to formalise in policy. Equally,

importance of retaining existing buildings where possible. Guidance would be expanded upon in accompanying technical advice note (TAN).	at present) would ensure the issue is not ignored, whilst leaving flexibility for applicants to respond in the most suitable way per application. Providing more detailed guidance in an accompanying TAN would allow for expectations to be expanded upon and guidance to be regularly updated considering evolving knowledge/guidance which is less developed than for addressing operational energy.	principles need to retain a level of flexibility to enable innovation and adaptation to specific context of individual sites and schemes.
Option b *Unless superseded by future updates to Building Regulations (or other national policy).* Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology and require applicants to demonstrate specific actions taken to reduce this as much as possible. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and reduced.	Requiring larger development to measure embodied carbon at the construction stage will allow for improved understanding of the embodied carbon problem. It will enable a more informed approach to addressing the issue and requiring applicants to demonstrate how they have taken action to reduce it will be an important step forward in delivering net zero construction. This could be expanded upon in future iterations of the local plan as national guidance and understanding on this issue grows.	Assessment methods for measuring embodied carbon in construction can be resource intensive and could be challenging for some smaller scale major development – setting an alternative/appropriate threshold for where these would be required may require further consideration. Demonstrating actions to reduce embodied carbon in major schemes is less prescriptive than setting a fixed maximum target for embodied carbon. It also risks a lack of clarity for applicants about how far the Council expects them to go in justifying their approach in an application and in the level of detail they will be asked to provide.
Option c	Same benefits as option C but going further requiring that embodied carbon	Setting specific targets to comply with will reduce the level of flexibility for applicants

Unless superseded by future updates to Building Regulations (or other national policy). Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology. Require applicants to demonstrate that they have kept embodied carbon levels to within a specific maximum target for embodied carbon on new developments. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and how they have aligned with policy target.	levels are kept to within a certain limit. This is likely to have more effect at reducing overall embodied carbon footprint of new development. Clear targets could also provide greater clarity to applicants about the level of action the Council expects them to take/demonstrate in order to address embodied carbon in the design process.	to respond to various drivers influencing design of proposals on particular sites. Rigid targets may not be achievable on some sites in the city and this more prescriptive approach to policy would make their redevelopment more challenging. Setting specific targets could be challenging at policy level considering the complexities of accounting for it in construction processes and the evolving nature of guidance/industry knowledge on this issue. Equally, it may be challenging for applicants to deliver upon or satisfactorily respond to in a planning application. Alongside net zero carbon in operation, targets for embodied carbon are likely to have additional viability impacts.
Option d Do not include any policy requirement setting principles or targets/requirements for measuring embodied carbon.	There is potential for future updates to national policy/ Building Regs that would address embodied carbon, which may render reference in the plan unnecessary.	Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed. Even when in place, the updated building regs will not deliver net zero carbon until the grid is decarbonised, it will also not address unregulated/ embodied carbon.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Yes, various options (e.g. options A alone, A+B, A+C, D)
High-level screening conclusion? - the options are similar to each other from a sustainability perspective
Screened in for detailed appraisal? - No

Rationale: Option a proposes setting general principles for applicants to follow in order to take action on reducing embodied carbon, whilst options b and c represent alternative ways of setting further standards for larger scale developments. Both options b and c require these types of applications to submit evidence showing they've quantified their embodied carbon and quantifying how much they have reduced this, however, option c goes further and sets a specific target that should not be exceeded. Option d is to set no local policy requirements for addressing embodied carbon.

In terms of sustainability impacts, the impacts arising from the options most directly relate to SA **criterion 1. Carbon Emissions.** For this criterion, option a is likely to have a slight positive impact, though will depend upon implementation, and may not result in any significant reductions in embodied carbon emissions. Option b and c have increasingly positive impacts as they begin to set standards for quantifying the emissions and actual reductions secured, so are likely to have more meaningful impact, though they will not negate all emissions so the positive impact would be minor overall. Option C is

655

Policy options set 008c (draft policy R3): Retrofitting existing buildings including heritage assets

5.10 The Local Plan 2042 will have limited influence over existing buildings that have already gone through the planning process, yet the earlier analysis in this background paper highlights that these buildings collectively form a significant source of carbon emissions which will need to be retro-fitted to help achieve local and national net zero targets. Many retro-fitting measures, such as fabric efficiency and installation of renewables, can be undertaken without planning permission, but where permission is required the Local Plan can help applicants to approach these projects in the right way.

5.11 This is particularly important for traditional buildings and heritage assets which can have special qualities which need to be conserved (particularly where these benefit from national designation). It will also help avoid problems of maladaptation which could lead to negative impacts for occupants' health (e.g. impairing passive ventilation processes many of these buildings rely

on and that is essential for avoiding damp build up). The options set out for this topic therefore mostly focus on how the Local Plan policy should treat applications impacting traditional and historic buildings.

Table 5.3 - Policy options set 008c: Retrofitting existing buildings including heritage assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.	This policy recognises the high priority afforded to the retrofit need in the city and seeks to ensure that retrofit measures that require planning permission will be supported wherever possible – particularly where demonstrable benefits for climate (mitigation or adaptation) can be evidenced. It highlights that as a starting point, such measures are presumed to be acceptable on planning grounds. This additional certainty is intended to support and encourage more occupants to pursue retrofit projects.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. Whilst this policy would highlight the importance which we assign to supporting retrofitting measures in existing buildings, there will be other material considerations which have to be weighed up against this policy and could still ultimately be determined to outweigh this presumption in favour.
Option b In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm.	This option addresses the retrofit need in the context of historic buildings and heritage assets and responds to the particular challenges present in the need to balance heritage considerations. It guides applicants to follow Whole Building Approach in order to ensure retro-fit maximises opportunities for	Same negatives as for option a as well as the following: Listed buildings and other heritage assets are afforded statutory protection which is over and above that given through planning controls. Great weight is given to preserving or not harming the

Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note (updated from the current version of TAN 15 supporting Local Plan 2036). This additional supporting guidance could expand on this complex topic such as by flagging measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit.	carbon reduction/climate adaptation and minimises potential for harm to the asset or its occupants (e.g. through maladaption). Same benefits as option a, however, this option would seek to provide further certainty for how retrofit of heritage assets will be considered through the planning application process. It would provide clarity on how to approach design of retrofit projects for these assets, setting out the key issues the Council would want to see addressed in an application for it to be succesful. Yet this option would also benefit from leaving flexibility for approaching each project in a way that is tailored to the specific context of the site and the particular features for which it is protected. Would also help to address the complexity in navigating how harm to heritage assets needs to be balanced with benefits of retrofit (e.g. carbon reduction/climate adaptation) in the decision-making process.	significance of these heritage assets, and this must be borne in mind when considering measures of change to buildings or retrofitting measures to combat or mitigate the impacts of climate change. In supporting retrofitting of older buildings, a policy will have to take account of the protection afforded to heritage assets and the need to preserve their values. Setting out principles that applicants would be expected to follow, as opposed to specific measures that would be acceptable or not, would still leave a fair amount of site-specific analysis for occupants to undertake. They would still need to set out project-specific justification for why a particular design (and set of retro-fit measures) has been selected. There is a risk that this quite complex topic of retro-fitting heritage assets remains a challenging one to navigate for applicants.
Option c In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate	Similar benefits as options above but without the additional flexibility for approaching site specific considerations relevant to retro-fit of heritage assets as is offered in option b.	Same negatives as above aside from the point about flexibility as is offered in option b which seeks only to set out key principles to follow.

adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on this through guidance in an updated version of Technical Advice Note 15.	Listing specific retrofit measures that would be more or less suitable in a policy potentially provides greater certainty to applicants as to which measures would be more appropriate versus those that would be viewed as more harmful in a heritage context. It might reduce some of the uncertainty around what would be acceptable for such applications.	In addition, option c's approach of setting out specific measures in the policy that may cause more or less harm would have its own potential negatives. This is because it is likely that identifying a strict list of measures that cause less harm in a policy will be challenging when the character and value of heritage assets and their setting varies so much across the city. Such a policy is likely to be highly complex to present in the Local Plan and subject to many caveats because it is unable to grapple with the level of detail needed to be truly helpful to applicants (and likely better suited to an optional Technical Advice Note instead). Ultimately, decisions will still have to be made on a case-by-case basis, thus the benefits of this approach may be undermined.
Option d Do not include policy addressing retrofitting of existing buildings and/or heritage assets.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. It would also be limited by the need for balancing other	This would ignore the significant need for pursuing retrofit projects on existing buildings in the city to reduce our carbon footprint. Any policy in the plan is likely to have limited effect in directly driving retrofit measures, however, by highlighting that such measures would be supported and providing clarity on what is most appropriate where, this could help to

	relevant planning issues in the decision-making process (such as any potential harm to protected heritage features).	avoid the planning system being seen as a barrier to uptake where such measures are planned and require planning permission.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Yes (e.g. options A, A+B, A+C, D) **High-level screening conclusion? -** the options should be screened in for detailed appraisal **Screened in for detailed appraisal? -** Yes **Rationale:** Option a sets out a presumption in favour of retro-fitting for non-heritage buildings, meanwhile, options b and c are alternative approaches for how local policy could support retro-fit on heritage assets and represent alternative approaches which could be combined with option a. Option d would mean no local policy requirements in relation to retro-fitting. Options a, b and c would all likely have some positive impact for **SA criterion 1. Carbon Emissions** and **SA criterion 2. Resilience to Climate Change** through establishing a local policy environment that is as supportive and enabling of retro-fit of existing buildings in order to achieve carbon reductions/energy efficiency or climate adaptation. Option b and c would have slightly more positive impact as they would also relate to the city's various historic buildings. Local Plan policy cannot enforce retro-fit of existing buildings and, in relation to historic assets, there are also other competing considerations that may limit the positive impact, meaning the options are likely to result in minor positives at best. Whilst Options b and c might increase the scope for positive impact against criteria 1. and 2., because these options would explicitly support sensitive retro-fit on heritage assets, they do also introduce the potential for harm to the special characteristics for which many are designated – thus resulting in a potential negative impact against **SA criterion 11 Urban Design and Historic Environment,** though the extent of this impact would depend upon implementation and types of assets that are retro-fitted, but should be reduced through following the key principles such a policy would set out. Option D would result in neutral impacts against the criterion because it would neither cause additional harm (indeed emissions are likely to continue to reduce in some respects e.g. as national grid decarbonises), nor will it result in specific positive impacts (there is no national requirement to undertake retro-fitting). The balance between competing priorities of reaching net zero through retro-fit and also continuing to preserve and enhance the historic environment which is intrinsic to Oxford is a complex one. Whilst the potential sustainability impacts arising from the

options are not expected to be significant, the extent of negative impacts under options b and c could vary. Based on this initial screening, it is suggested that the option set should be scoped in for further detailed appraisal.

Policy options set 008d (draft policy G9): Resilient design and construction

5.12 Oxford is at risk from climate change, particularly in relation to increased flood risk, water stress, overheating and more intense weather events generally. Climate resilience will be supported by various policy areas in the Local Plan, and various climate adaptations such as greening can have multiple benefits not just for making places that are healthier and more comfortable for people. A specific policy could be beneficial in ensuring that the key issues of relevance are flagged to applicants and in guiding them towards considering future climate as part of their design process. The options presented below relate to what this policy approach could look like.

Table 5.4 - Policy options set 008d: Resilient design and construction

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a discrete adaptation/ resilience policy, whilst continuing to address risks in other policies where relevant. Ask applicants to demonstrate how they have designed in accordance with policy via the design checklist or a separate checklist. Cross referencing to other relevant policy requirements (e.g. flooding) as well as incorporating other specific requirements such as: • Need for climate resilience impact assessment; • Details of a cooling strategy (for the building and surrounding	Would set out a strong position/stance on the issue of climate adaptation and building resilience to climate impacts which could negatively impact on health and wellbeing. Bringing the range of policy areas into one checklist, ensuring applicants are looking at them through the lens of climate resilience, could be helpful. Would specifically pick up on issue of overheating, a key risk in the city moving into the future, and require applicants to detail what measures they have included	Many aspects of climate adaptation will be dealt with through other policies, there is a danger of repetition e.g. with health, flood risk, design, and GI. Will need to find a consistent and concise way for applicants to demonstrate they have met these policy requirements without forcing them to repeat work in multiple places in their application. The design checklist would be one means of doing this. Could allow for cross-referencing to evidence prepared to meet other policy requirements where relevant.

660

spaces in large schemes, addressing alignment and shading) intrinsic to the design (not having implications for carbon use), including measures for addressing overheating risk for lifetime of development; • Measures to conserve/recycle water; • Flood resistance/resilience measures; • Supporting infrastructure such as electricity supply and broadband designed to function in extreme weather conditions (such as prolonged periods of very high temperatures or heavy rainfall).	in design/construction to address this and maintain thermal comfort for occupants during hot summer periods. Likely to go further than what is asked for in Building Regs alone.	
Option b Require major development to achieve certification against a recognised sustainability assessment e.g. BREEAM/HQM.	There are several sustainability certification schemes in existence which are well recognised by industry such as BREEAM. These schemes often take a holistic view of design and ensure that considerations like climate change are weighed up alongside other design measures. Certification would ensure a high standard of sustainable design in major developments and help to ensure consistency across for applicants.	Schemes such as BREEAM are not specifically focused on climate resilience/adaptation alone, it is usually one element that is assessed amongst a range of sustainability considerations. Points that underpin certification can usually be scored across a variety of categories – though we could require points in certain places as we do at present with requiring 4 points under the water topic of BREEAM under RE1. This option would force applicants to pursue independent certification with a

		particular provider, though we could specify that any equivalent is acceptable to provide more flexibility. Relying on this kind of certification alone may not fully maximise climate resilience objectives. Likely to incur additional costs and resource demands for applicants.
Option c Address climate risks as theme purely through other policies e.g. design flood risk, green infrastructure. No requirement for specific policy addressing issue.	Ensures resilience/adaptation is central to thinking across local plan policy framework. Avoids repetition of requirements/considerations set out in other complementary policy areas (e.g. flooding and green infrastructure).	Climate resilience aspects can be lost amongst other objectives when they are not given sufficient consideration. There are some specific adaptive measures, and wider sustainable construction issues which may not easily fit into other policy areas without making them overly long/ unwieldy.
Option d No policy on climate adaptation/resilience – rely on national guidance.	Some elements of building resilience to climate change will necessarily be covered elsewhere e.g. flood risk requirements are strong in NPPF, overheating within building regs.	Ignores local context – e.g. heritage, dense urban environment, as well as identified climate risks facing the city in future. National policy hasn't traditionally been particularly strong on adaptation. Could miss opportunities to tie together benefits for many complementing agendas – e.g. health, air quality.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Either option A, B, A+B, C, C+B, or D **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** The options represent different approaches to incorporating requirements for applicants to deliver climate resilient design into local policy or not. Option a would be to have a bespoke policy with a checklist of requirements for them to address where relevant and option c would instead scatter these requirements across other policies. Option B would instead require applicants to achieve certification against an independent sustainability certification scheme, which could be standalone or in combination with option A or C. Option D would be to have no local policy requirements about climate resilient design. Most directly these policy options relate to **criterion 2. Resilience to climate change**, although the wide-ranging nature of climate resilient design means that these policy options can indirectly impact a variety of other criteria such as **criterion 7. Green Infrastructure** (where resilience measures include greening), **criterion 5 inequalities** (where resilient design reduces health risks from climate change), though this is more dependent upon implementation and challenging to appraise. In relation to criterion 2, however, the options are all likely to represent minor positive impacts, other than option d, with the differences between them being more about how a local policy approach is implemented through the local plan. Option D is assumed to be neutral (because national policy has enough requirements to at least ensure some level of risk mitigation such as through national guidance on addressing flooding and Building Regs addressing overheating to some degree). Overall, the differences between the options are not significant enough in sustainability terms to warrant being scoped in for a detailed appraisal.

663

6. Conclusions including preferred approaches for Local Plan 2042

6.1 The Council is legally expected to ensure that actions to mitigate climate change are incorporated into its Local Plan making process and policies are included that support the transition to a net zero carbon future. Such policies will be important not only for achieving the UK net zero target of 2050, but also the city's own net zero target of 2040. They are also important for helping to improve upon the health and wellbeing of Oxford's residents such as by improving energy security and reducing energy bills.

6.2 As the new Local Plan is developed, it is will be important to consider a range of issues, including improving energy efficiency of new buildings and reducing their operational carbon footprint, and helping to enable occupiers of existing buildings to drive retro-fitting that can help improve the sustainability of these structures too where possible. It will also be important to lay the groundwork for reducing embodied carbon within the construction process which is a more complex challenge, but one of increasing concern.

Key sustainability issues for the Local Plan to address in relation to carbon reduction and climate resilience:

- Significant amount of action required addressing all sectors including buildings, transport and waste to reduce existing carbon footprint and meet city's ambitious 2040 target.
- Ensuring that new development is fit for a net zero carbon future and does not contribute to climate change further.
- Embedding the principles of the energy hierarchy into the approach to designing new buildings (fabric first, reducing energy use, mitigating remaining emissions).
- Addressing embodied carbon/energy as part of the construction process.
- Potential for supporting small and larger scale renewable energy generation across city.
- Challenges of retro-fitting of existing built stock and balancing need to deliver carbon reduction against other constraints like protecting heritage/conservation assets.
- Climate adaptation/resilience is also a key issue as Oxford is already at risk from flooding and overheating and this risk will increase in future.

Other plan-related issues

- Balancing the needs to deliver other important council priorities (e.g. affordable housing) with the cost of delivering net zero developments across the city.
- Ensuring that any new standards set are deliverable financially and practically.

Preferred approaches for the Local Plan 2042

6.3 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address which relate to carbon reduction and achieving net zero carbon objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Net Zero Carbon buildings in operation – Draft policy R1

6.4 The preferred approach for the Local Plan 2042 policy is to take forward a combination of **options A, C and E**. Whilst the approach would risk not aligning with central government expectations (because it sets energy standards for development that exceed national standards), this approach is considered necessary to ensure new development does not compromise the city's ability to meet net zero carbon targets in future.

6.5 The combination of **options A and C** will help reduce need to retro-fit buildings in future and also help to address risks of fuel poverty for occupants of new buildings by reducing energy demands to operate buildings and drive renewable energy onsite, which can help with bills. Equally, driving more energy efficient buildings are important for reducing burdens on the wider energy grid.

6.6 The addition of **option E**, which makes an allowance for offsetting is considered to be a necessary and pragmatic approach, recognising that delivering net zero buildings in operation will be challenging for some typologies. It should only be allowed for as a last resort, once all onsite options for meeting the rest of the policy have been explored. Where utilised, the offsetting mechanism could help to deliver retro-fitting of existing buildings, which is also a potential positive (though the preference is for the mechanism to be used sparingly, if at all).

Embodied carbon in the construction process – Draft policy R2

6.7 The preferred approach for this topic is a policy that comprises of **options A and B.** The policy approach for the Local Plan 2042 would essentially act as a stepping stone, introducing requirements for the city where very little currently exist, but also recognising that embodied carbon is an area of complex topic and one where understanding is still emerging.

6.8 **Option A** would apply to all proposals, but the principles it would propose will vary in relevance depending on each specific site context and type of development proposed. The principles would act as important considerations to guide applicants when designing their proposals, whilst remaining flexible enough to respond to the varying context that each application for development is brought forward in. **Option B** would seek to push larger developments towards taking more explicit action in addressing this topic. Whilst

the option does not impose specific targets to limit embodied carbon to, which some may feel limits the effectiveness of the policy, it would help to ensure the largest schemes with the most significant potential impacts are transparently calculating embodied carbon and specifically demonstrating the types of measures they propose to reduce this and by how much.

6.9 The options together will help to improve awareness and understanding around this topic which will be of increasing pertinence in future. They will form an important step forwards towards potentially more stringent requirements in future, either locally or nationally.

Retro-fitting existing buildings including heritage assets – Draft policy R3

6.10 The preferred approach for policy addressing retro-fitting in the new Local Plan is a combination of **options A and B.** This would make it clear that the Council supports retro-fitting existing buildings, but that for traditional buildings and heritage assets this support is contingent on applicants demonstrating they have approached the design of retro-fit projects in the right way.

6.11 **Option B** includes that the policy would set out the need for taking a Whole Building Approach to retro-fitting traditional buildings and heritage assets along with some other key principles to follow. It would then refer applicants to a more detailed Technical Advice Note, which can be kept updated as regularly as needed, to provide additional guidance. This would ensure that the key considerations that an applicant needs to address as part of their application are set out in the policy. However, it would allow flexibility to take into consideration varying contextual factors that might need to guide design on a case-by-case basis, as there is unlikely to be a one-size-fits-all solution that will work for every building and site in the city.

6.12 The option set was scoped in for testing through the Sustainability Appraisal (SA) to better understand the effects of each option and any potential for significant effects. The SA testing indicates that this preferred approach would have the most sustainability benefits according to the SA testing, although potential for negative impacts in terms of the historic environment would need to be mitigated through careful wording of the policy in terms of guidance for applications impacting traditional buildings/heritage assets.

Resilient design and construction – Draft policy G9

6.13 The preferred approach for the Local Plan 2042 is **Option A.** This acknowledges climate risk as a key issue for health and wellbeing of people and the sustainability of the wider city and will allow the Local Plan to guide applications in considering future climate change as part of the design process. The key issues of concern relevant to Oxford and its particular climate change risks can be set out in the policy and applicants can be encouraged to incorporate resilience measures to address them through the design process.

6.14 There is likely to be overlap with other policy areas, e.g. requirements for addressing flood risk, or providing green infrastructure, and information provided to meet other policy requirements can be used to support meeting this policy's requirements. The policy will help to ensure that these aspects of design are approached through the lens of adapting to climate change in particular, which may not always be the focus, and will help reduce the chances of opportunities for resilience building being missed.

Background paper 009

Title: Natural Resources including air, water, soil quality

This paper addresses the protection of Oxford's natural resources including the quality of air, water and land/soil.
Relevant Local Plan Objective(s): • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.
Relevant SA Objective(s): 8. To reduce traffic and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve water quality targets and manage water resources.
SEA theme(s): Water, air and climatic factors, soil, material assets, landscape

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 8

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 13

5. Options for Local Plan 2042 policies 15

Policy options set 009a (draft policy R4): Air quality assessments and standards 17

Policy options set 009b (draft policy R5): Water quality and resources 19

Policy options set 009c (draft policy R6): Soil quality 22

Policy options set 009d (draft policy R7): Contaminated land 24

Policy options set 009e (draft policy R8): Amenity and environmental health impacts of development 26

6. Conclusions including preferred approaches for Local Plan 2042 28

6.1. Preferred approaches for the Local Plan 2042 29

1. Introduction

This background paper addresses the topic of environmental quality and natural resources in the city. In particular, it focuses on three aspects of Oxford's environment: the quality of air, land (including soils), and water and the issues that relate to these different aspects of the environment.

Oxford is a small city with a tightly drawn administrative boundary and contains a number of physical and policy constraints which means that land must be used prudently. Where land is available, it needs to be used in the most efficient way possible while ensuring that there is no harm to the city's natural environment, human health and well-being.

The issue of poor air quality is multi-faceted and has various causes which are discussed in greater detail later. It is an important topic for the Local Plan to address because air pollution has a direct link with health and well-being and has been evidenced to cause and exacerbate health problems. Poor air quality also has negative impacts for the wider natural environment, especially our most sensitive ecological habitats.

Oxford has a long history of settlement with different parts of the city having been used for a variety of types of development in the past, some of which can leave behind a legacy of contaminated materials and other pollution which is another issue the planning process needs to address. The development process can play an important role in helping to identify historic contamination and contributing to its remediation to make it safe for future generations, however, where this is not carried out appropriately, people can be brought into contact with harmful pollutants that can damage health. Equally, it is important to ensure that the quality of our soils is protected as these act as important natural capital which supports the environment in a number of ways, from mitigating flood risk and supporting healthy habitats, to acting as important sinks of carbon which could otherwise be released into the atmosphere exacerbating our impacts on climate change.

Water quality issues have been brought to the forefront of planning since the introduction of the Water Environment Regulations, which seek to ensure that the biological and chemical quality of watercourses in England and Wales reach a "good standard". Key concerns for the Local Plan to address include whether the availability of sufficient water resources for the existing and future population of Oxford. Also, that the quality of the water environment is preserved from further harm arising from new development, particularly because certain nature sites rely on certain amounts and quality of water to maintain the particular habitats and species for which they are protected.

The paper also considers wider issues of pollution such as impacts of noise and light which are also important for new development to address where necessary.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

There are a range of national and local plans, policies and strategies which form important context for the policies of the new Local Plan. Those of most relevance to the natural resources policies are summarised below.

National Planning Policy Framework (NPPF)

The NPPF addresses topics of natural resources and environmental quality in several sections. In particular, paragraph 187 of the NPPF states that policies should contribute to and enhance the natural and local environment in a number of ways including:

- Protecting and enhancing soils (in a manner commensurate with statutory status or identified quality in the development plan)
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraphs 196 to 201 of the NPPF set out various requirements relating to ground conditions and pollution including:

- Ensuring that sites are suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- Ensuring that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment
- Policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, (including presence of Air Quality Management Areas and Clean Air Zones). Identify opportunities to improve air quality or mitigate impacts such as through traffic and travel management, and green infrastructure.

Paragraph 124 of the NPPF sets out principles for effective use of land and strongly emphasises making as much use as possible of previously developed or "brownfield" land (paragraph 125(c) unless it would conflict with other policies in the NPPF. Paragraph 125 also sets out that plans should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production. It also sets out that plans should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Water supply and wastewater treatment is briefly referenced in the NPPF, including that strategic policies should set out a strategy for and make provision for infrastructure to address this (paragraph 20). Also, take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications of water supply (paragraph 162).

National Planning Practice Guidance, including National Design Guide

The Planning Practice Guidance (PPG) provides additional support for interpreting the policies of the NPPF related to these topics, for example:

- Air quality guidance, covering topics such as: the air quality considerations planning and local plans address; information sources available to assess air quality; detail required within air quality assessments; and how can air quality impacts be mitigated.
- Water supply, wastewater and water quality guidance, which sets out how this should be addressed within planning processes as well as where information can be obtained with respect to the water environment.
- Land quality, is in several places including in guidance about contaminated land and land stability, about how the planning processes should interpret and address these issues as well as potential mitigation measures.
- The National Design Guide sets out ten components of what the government considers to be good design. One of these components is the efficient use of resources including issues of prudent use of resources and factoring risks of pollution into the design process.

The Environment Act 2021

The Environment Act 2021 does not revoke or replace the Environment Act 1995, but it does make amendments to strengthen and enforce adoption of the environmental provisions. The Act includes requirements for the Secretary of State for DEFRA, to set long-

term legally binding targets on air quality, biodiversity, water, resource efficiency and waste reduction within the UK. Part 5 of the Act also aims to tackling discharge of sewage and places several duties on water companies regarding monitoring of water quality near storm overflows and sewage disposal works to secure a reduction in the adverse impacts of discharges from storm overflows.

Air Quality: other specific context

Air Quality Standards Regulations 2010 (as amended) and Air Quality Strategy

The European Directive 2008/50/EC was transposed to UK law through the UK Air Quality Standards Regulations 2010. This legislation sets legally binding limits for concentrations in outdoor air of air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). Key limits are:

- the annual mean standard for NO2, which is 40 µg/m3 for humans and 30 µg/m3 for vegetation.
- Targets for fine particulate matter (PM2.5) set through the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, which require a maximum annual mean concentration target of 10µg/m3 to be achieved by 2040 (the AMCT), and a population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT). Defra is developing guidance on how to consider PM2.5 targets in planning decisions.

The UK Air Quality Strategy sets out the UK government's plans for dealing with all sources of air pollution. The Environment Act 1995 Part IV of the Environment Act 1995 requires the Secretary of State to publish a national Air Quality Strategy and established the system of local air quality management. The Act also requires local authorities to regularly monitor air pollution in their areas against national targets and to take action where it is found that these targets are unlikely to be met. If areas are found to be in exceedance of the legal limit values and improvements are necessary, those areas need to be designated Air Quality Management Areas, and an Action Plan need to be developed and put in place by the local authority which set up the actions that are going to be put in place to address air quality.

Oxford City Air Quality Action Plan 2021-2025

Oxford City Council is committing to becoming the first UK Local Authority to set a local annual mean NO2 target in a citywide AQAP. The Oxford Air Quality Action Plan 2021-2025 sets an ambitious target of meeting a local annual mean (Nitrogen Dioxide) NO2 target of

30µg/m3 by 2025. The overall objective of this AQAP for the whole of the Oxford City area is to achieve a local annual mean NO2 target of 30 µg/m3 by 2025 “30 by 25”.

The Plan sets out 30 actions and measures that will be delivered by Oxford City Council and partners, via four priority areas of intervention:

a) Developing partnerships and public education;
b) Support for the uptake of Low and Zero emission vehicles;
c) Reducing emissions from domestic heating, industry and services;
d) Reduce the need to travel, explore opportunities for modal shift and increase the uptake of sustainable transport.

Progress against the targets is reported annually in the Annual Air Quality Status Report, the most recent was published in June 2024.

The Council is currently in the process of producing an updated source apportionment study, which will update the known picture of the contribution of the various sectors (e.g. transport, domestic, industry, etc) to the levels of the various air pollutants in the city. This work will then inform a new Air Quality Action Plan that is expected to replace the existing one (which covers the city to 2025) in due course.

Land Quality: other specific context

Oxfordshire County Council Minerals and Waste Plan

Oxfordshire County Council has an adopted Minerals and Waste Core Strategy which sets out the over-arching county policy for minerals and waste in Oxfordshire to 2031. Work is underway on a new Minerals & Waste Plan which would cover the period to 2042.

Land Quality Strategy for Oxford (2020)

This City Council strategy seeks to ensure that Oxford’s residents and the natural environment are not exposed to unacceptable risks from land contamination and to improve our environment for a sustainable future. The strategy seeks to achieve this through working with developers, landowners and other key stakeholders to manage risks from land contamination effectively and efficiently. The first objective of the strategy is “To deal with contamination through development control and building control wherever possible”. In order to achieve this, the strategy sets out that it seeks to “ensure that land contamination is taken into account when developing planning policy documents”.

Water Quality: other specific context

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

These regulations aim to improve and integrate the way water bodies are managed in England and Wales. They require England and Wales to reach good chemical and ecological status in inland and coastal waters by 2027.

Thames River Basin District Management Plan, Environment Agency 2022

River Basin Management Plans provide a framework for the protection and enhancement of water environments at a river basin scale, as part of implementing the Water Framework Directive.

The Thames River Basin District Management Plan (updated 2022) covers a wide area including Oxford, and it identifies a number of significant water management issues impacting upon the river basin as a whole, (though not necessarily reflective of Oxford specifically) including issues relating to physical modifications to water bodies; pollution from waste water; pollution from towns, cities and transport; changes to the natural flow and level of water; negative effects of invasive non-native species; and pollution from rural areas.

Thames Water's Water Resources Management Plan 2024

Thames Water recently published its updated Water Resources Management Plan (WRMP) which sets out how the company will provide a secure and sustainable supply of water to their customers, whilst protecting the environment, over the next 75 years. WRMPs are important strategic plans that set out the preferred programme for managing water resources in the Thames Water supply area. The plan sets out forecasts of supply and demand, including the expected shortfalls in the future due to pressures such as climate change and population growth. It also sets out a programme of planned interventions to ensure that water resources within the Thames Water area are appropriately managed, including demand reduction measures like addressing leaks, and larger more strategic measures including water transfers and a new reservoir in the Abingdon area.

Thames Water's Drainage and Wastewater Management Plan

Thames Water's Drainage and Wastewater Management Plan (DWMP) addresses future pressures on our wastewater service and sets out their approach and the investment

needed to deliver a sustainable service that manages wastewater for the area and protects the environment. The DWMP covers a 25 year period and was published in May 2023.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Air quality

The City Council declared an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO2) in central Oxford in 2003, which was expanded in 2005. Despite good progress being made as part of the responses enacted to address these designations, significant breaches of the national objectives for NO2 still existed and additional hotspots were identified. Following further detailed assessments of air quality, a city-wide AQMA was declared in September 2010. In 2021 the Council published its Air Quality Action Plan (AQAP) prepared to address poor air quality in the city covers the period from 2021-2025 and includes an ambitious headline target to "achieve a local mean NO2 target of 30µg/m3 by 2025".

Air pollution can have a variety of causes including tail pipe emissions from transport, the wearing of tyre and brake pads, as well as emissions from heating sources within buildings (e.g. gas boilers). The pollutants are comprised of various substances including nitrogen dioxide, ozone, and particulate matter (small particles of solids like soot and dust). According to analysis from the Council's most recent (2020) source apportionment study, the transport sector is the largest contributor (68%) to total emissions of Nitrogen Oxides (NOx) in the city, followed by domestic combustion (19%), combustion from industry and services (12%) and others: waste, agriculture, solvents, nature (<1%).

The Council's annual air quality status report (published June 2024 and reporting on 2023 observations) indicates the following in terms of current situation:

- The current status report notes that air pollution levels have significantly improved in the city of Oxford over the last few years since the launch of the Air Quality Action Plan (AQAP) 2021-2025, with an average reduction of 18% of Nitrogen Dioxide (NO2) across the city since 2021. Despite this, there are still challenges to address.
- Only two of the 128 sites that the city monitors for NO2 levels were in breach of the UK's legal annual mean limit value for this pollutant: Headington Hill (TF19) and Southern Bypass (TF35), at Oxford's ring road, though these are not areas of

primary concern (i.e. where members of the public are likely to be regularly present for a period of time).

- Only nine of the 128 sites were in breach of Oxford's local annual mean target for NO2 (30 µg/m3) – this target is the city's local commitment laid out in the city's AQAP, and which is expected to be achieved across the city by 2025. Those locations are St Aldates, St Clements (DT55 and DT77), High Street (DT56), Holloway Road (DT80), Headington Hill (TF19), and Oxford's ring road (TF27, TF31, TF35).
- 2023 saw an average decrease in NO2 levels in the city of 14% compared with the previous monitoring year of 2022, and were 33% below the levels in 2019 (the last pre-pandemic year). These reductions are likely linked with reductions in transport levels in the city seen recently, which are also expected to have been influenced by the closure of the Botley Road in April 2023 for improvements to the railway station, as well as the influence of the Zero Emission Zone Annual mean for particulate matter (PM2.5 and PM10) levels is measured in fewer locations than NO2 (at AURN St Ebbes, representing urban background and Oxford High Street, representing roadside). For PM2.5, annual mean levels recorded at the city's two monitoring locations were of 6 and 8 µg/m3 respectively. These are below the current UK legal annual mean limit of this pollutant (10 µg/m3) but slightly above the WHO recommended annual mean (5 µg/m3). Annual mean PM10 levels were recorded as 9 and 14 µg/m3 respectively and have seen reductions of 25% and 12.5% at the city's monitoring sites compared with the levels measured at these sites in 2022. Values are well within compliance with the UK's annual mean limit value of 40 µg/m3, and just below the 15 µg/m3 guideline value recommended by WHO for this pollutant.
- Ozone is measured at one site in Oxford and levels exceeded the legal air quality objectives for this pollutant 113 times, during a total of 19 days in 2023, compared with 159 times over a total of 24 days during 2022. However, local measures alone are not enough to tackle the problem of ozone and actions at different levels of governance (i.e. regionally and internationally) are required.
- The report also details various positive steps that have happened over the last year with regard to addressing transport emissions. For example, holding an EV summit; the delivery of 159 electric buses (which will represent 69% of bus mileage in the city); and the launch of a new e-cargo bike delivery trial.

Long-term exposure to air pollution has been linked to chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term increases in levels of air pollution is associated with a range of

health impacts, including lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. It can be particularly detrimental for society's most vulnerable including the children, the elderly, those with long-term health conditions. Air quality was legally recognised as a contributing factor in the death of an individual in the UK for the first time in 2020. The issues of poor air quality affect everyone, but there are often inequalities in exposure towards those living in more deprived communities for reasons such as: living in poorer quality buildings; reduced access to open space and green infrastructure; proximity to busier main roads where pollution is worst.

Poor air quality can also have negative impacts on sensitive habitats, particularly near to sources of emissions like roads with deposits of substances like nitrogen altering the suitability of the environment for certain species and changing the makeup of the ecosystem over time. Previous iterations of Habitats Regulations Assessment (HRA) have flagged that air quality impacts are a particular sensitivity that risks the habitats and species of the Oxford Meadows Special Areas of Conservation (SAC) and proposals in the new Local Plan will need to be assessed via a new HRA in order to explore their impacts in relation to this.

Land quality/soils

Oxford contains several wedges of agricultural land. The best and most versatile agricultural land (Grades 1, 2, and 3a) is considered to be a national resource and should not be lost. Most of the agricultural land in Oxford is not of this quality, however, there are some parcels of Grade 2 agricultural land north of Binsey and in the Cherwell Valley.

Oxford has seen significant industrial change to the present day in fact Oxford's industrial history has resulted in a substantial amount of land affected by contamination. Almost all of the former major industrial sites have now been remediated and redeveloped, such as Lucy's in Jericho and the former car factory site in Cowley. However, there remain a number of smaller sites that have the potential to be affected by contamination.

In 1989, Oxford City Council commissioned a review of former landfill sites in the city. It was a comprehensive review that allowed the city council to manage the risks associated with those sites. A review of council owned allotment sites was also carried out in the 1990s following some concerns about the quality of the land for growing produce. Since then, some council-owned land, such as former depots, has been redeveloped for housing and the necessary site investigations and remediation has been secured through the planning process.

Oxford City Council maintains a public Contaminated Land Register in accordance with the relevant legislation. There are currently no entries on the Contaminated Land Register. It is worth noting that the register does not include the details of sites that have been remediated through the planning process. There is the possibility that contaminated sites which have not been identified remain and thus could be added to the register in the future.

Oxford also has a number of peat-rich soil deposits which are located in several locations across the city. Peat rich soils are particularly valuable natural features which not only act as important storage for carbon (carbon sinks) but are also important for managing/storing water and also for retaining archaeological deposits. Mapping from Natural England's website has these identified at Dunstan Park, around the Churchill Hospital and Lye Valley, as well as along Littlemore Brook in the south of the city. Engagement with Natural England officers suggests that this mapping is only approximate and that a future project is likely to result in refinements to this mapping. Indeed, the Council is aware of the potential for deposits more widely in the city despite historic development having likely removed much of what was once present.

Water resources/water quality

The Council is in the process of undertaking a separate Water Cycle Study which should be referred to for a detailed assessment of water conditions in the city. This will follow the good practice guidance for preparing such studies as set out by the Environment Agency. The following is a summary of the situation in relation to water resources (supply and quality) as it is currently understood.

In terms of water supply, the city remains in an area of serious water stress as identified by the EA and this is the basis for the more stringent water use limits imposed by Building Regs which the Local Plan 2036 requires of new development. Thames Water are responsible for water supply for the city and their Water Resources Management Plan (see earlier in this background paper) notes several key challenges facing the management of the water supply for the region in the future: a growing population, climate change and the need to protect the environment. By 2050, without taking action, the plan projects a water supply shortfall for the region of 1060 million litres per day, which increases to 1100 million litres per day by 2075. In order to tackle the shortfall, the plan proposes a variety of measures including leakage reduction, smart meter installation, free water efficiency measures and advice for customers, as well as new water supply schemes.

Water quality issues are ongoing in the city, with the majority of watercourses either classified as moderate or poor in ecological status for a variety of reasons. Oxford is

located within the Thames River Basin District which is covered by the Thames River Basin Management Plan (TRBMP) which was last updated by the Environment Agency in 2022. As part of this update, revised condition assessments are available showing the variety of reasons for the condition of water quality in waterbodies, in particular:

- Agricultural practices (poor nutrient management)
- Sewage discharge
- Invasive species
- Urbanisation
- Global pollutants (uPBTs) - causing all waterbodies across country to currently be classed as fail for chemical status

Some of these stressors are not within the Local Plan's influence, for example, pollution arising from agricultural practices within the catchment, as well as the influx of invasive species into watercourse or the chemical contamination arising from global pollutants. Others are more within the influence of planning policies that guide the quality of new development, for example the treatment of urban run-off arising from urbanisation, as well as the pressures on wastewater infrastructure leading to sewage discharges (though this is partial in relation to new development, as there is already a significant proportion of existing development that new planning policies are not able to influence).

There are known capacity concerns in relation to wastewater infrastructure in the city and upgrades are required to the Wastewater Treatment works which services the city to address current capacity problems and future needs. On 20 March 2025, following a rigorous process to find a solution to the existing concerns, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford STW, this will help provide the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward. Separately, Thames Water's Drainage and Wastewater Management Plan (covering the period 2025 to 2050), proposes various measures to address targets for addressing known issues with the wastewater and drainage systems across their region which will include Oxford. The Council has been engaging with representatives of Thames Water and the EA during preparation of the Local Plan 2040 and will continue to do so with the new Local Plan 2042.

Groundwater is another important element of the city's water environment and the Environment Agency includes various pieces of guidance in relation to its protection. The quality of groundwater and the way it flows below the ground can be particularly important for maintaining the healthy functioning of various sensitive ecological sites around the city, including the Oxford Meadows SAC and SSSIs such as the Lye Valley. New development

coming forward in particular areas needs to ensure that risks of introducing pollutants into groundwater are mitigated sufficiently but also that subterranean development, such as introduction of basements, does not interrupt water flows.

Climate change is likely to put additional pressures on the water environment in future. Drier, warmer summers could put pressure on water supply and the quality of waterbodies in the city, as well as impacting the more sensitive habitats that rely on a certain hydrological profile to support species that exist there. Equally, more intense rainfall events could put additional pressures on wastewater systems and result in additional releases of pollutants into waterbodies without appropriate mitigation measures in place.

Other impacts on the environment

The development process can have other impacts on the environment and people's health unless sufficient mitigations are put in place. In denser urban areas, sources of different types of amenity impact and pollution can be more common and their impacts increased. For example,

- Impacts of noise pollution arising from construction processes as well as when a development is in operation and from other sources such as traffic can have a variety of health impacts such as sleep disturbance, impairing concentration and causing stress in people whilst also disturbing wildlife.
- Impacts of dust released arising from during construction processes like demolition and processing materials can exacerbate air pollution
- Impacts from odour, including where development arises in proximity to particular odour sources such as sewage treatment works or industrial uses.
- Excessive artificial lighting can impair natural functions of wildlife such as birds and insects.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

The policies of the adopted Local Plan 2036 would continue to apply up to 2036. After that, protection would default to national policy which affords various protections and requirements for addressing issues of pollution/contamination of air, land and water. This would be supported by the range of other associated environmental legislation, including what was touched upon in the policy context section.

Whilst air pollution arises from various sources, it is predominantly transport-related emissions (particularly fossil fuel burning engines) which is responsible for the bulk of

pollutants in Oxford. The Local Plan has limited influence on transport emissions as the Council is not the highways authority. However, there are a number of schemes proposed for Oxford through the Local Transport and Connectivity Plan (LTCP) and the Central Oxfordshire Travel Plan (COTP) which, in combination, should improve air quality by reducing emissions associated with transport. These include: traffic filters, low traffic neighbourhoods (LTNs), and the zero-emission zone (ZEZ). These are likely to bring benefits even without a new local plan as they are being driven via different work-programmes and funding. The Transport and Connectivity background paper XX explains these programmes in more detail.

Nationally, transport-related emissions are expected to continue to reduce as transport shifts towards electric vehicles with the phasing out of new petrol/diesel engines (previously this was delayed to 2035, although the current government have pledged to bring this date forward to 2030). Indeed, Oxford is already shifting public transport to electric modes, with the recent delivery of 159 electric buses which will help to shift 69% of the total bus mileage operating in the city to electric. There are likely to remain air quality impacts from brakes/tyres, however, small improvements could also occur in this regard as technologies improve.

Government proposals to phase out gas boilers in domestic heating, alongside tighter Building Regulations and general improvements in the efficiency of these systems, are also likely to bring improvements in relation to domestic sources of air pollutants in the absence of a new Local Plan, at least for new buildings. The effect of these improvements in reducing the sources of emissions from existing buildings will likely take more time as the retro-fitting of existing stock is a significant challenge. These issues are explored more in the Carbon Reduction and Net Zero background paper XX.

In terms of efficient use of land, development pressures will continue in the city regardless of a new Local Plan, with high demand for land for housing and commercial uses in particular; pressure for higher density development; and a continued reliance on previously developed land (which also now has greater emphasis in the 2024 NPPF updates). The absence of an up-to-date Local Plan could potentially increase the pressure for development on greenfield sites within the city boundary, including open spaces which could be used for agricultural land. This could have subsequent implications for degrading soils if unmitigated, including areas of more carbon-rich peat reserves which have not already been lost, as well as the potential to have an adverse impact on the amenity of residents and visitors to the city. With use of previously-developed land, there is also likely to be a continued need to address issues of contaminated land including appropriate

remediation where necessary to ensure that people do not come into contact with harmful pollutants.

In terms of water resources, Oxford is already in an area of water stress, and climate change may exacerbate this. Increased development and associated population growth will also put more pressure on water resources without appropriate mitigations. Thames Water has various plans in place to address water supply and wastewater treatment which will likely have benefits for Oxford. To be most effective, these will also need to be combined with appropriate water efficiency measures in homes and businesses, which a new Local Plan could help to implement for new developments only (not for retrofitting), particularly after 2036 when the current Local Plan would no longer apply. A new Local Plan would also provide infrastructure providers like Thames Water with the best certainty over the location, scale, and type of future development expected to come forward in the city allowing them to better plan for future needs.

In relation to water quality, Local Plans have varying levels of influence over the different factors negatively impacting the quality of the water environment in the city. Without a new Local Plan, problems associated with urbanisation and sewage discharge could be exacerbated as the current Local Plan policies grow out of date, meanwhile impacts of pollution relating to agriculture, or invasive species in the environment are likely to persist without other types of interventions outside of planning. There are various infrastructure upgrades and improvements that will need to be carried out by Thames Water in order to address existing capacity concerns and meet demands for the future, which will support improvements to the water environment by addressing problems of sewage discharges. Again, having an up-to-date Local Plan can help ensure that there is a clear picture of how future development will come forward in order to help inform those upgrades. Whilst the current Local Plan sets policies that help to mitigate water quality impacts from new development (e.g. SUDs policies), a new Local Plan will help to ensure the right policies are in place up to 2042 in order to mitigate impacts of future growth and complement the upgrades to infrastructure that also need to be put in place.

5. Options for Local Plan 2042 policies

A number of potential topics for policies derive from the analysis set out in the previous sections. These will be important for delivering upon the various Local Plan 2042 objectives that relate to addressing the quality of air, water and land in the city and, more specifically, will also help to ensure that new development comes forward in a way that mitigates harm to the environment. They will also help to respond to various legislative

requirements. The Local Plan 2042 therefore includes proposed policies in response to four topics:

- Air quality
- Water resources and water quality
- Soil quality and land contamination (addressed as two separate policies).
- Amenity and environmental health

For each potential policy, options for the specific approach that could be taken for the Local Plan 2042 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). A summary of this screening process is included at the end of each options set table.

Policy options set 009a (draft policy R4): Air quality assessments and standards

Whilst air quality is improving in the city, it is important that new development is designed with appropriate consideration for existing pollutant exposure in area, potential impacts on users of the development (including sensitive users), and also the potential for the new development to exacerbate existing issues. Whilst the key pollutant of concern in the city to date has been Nitrogen Dioxide, there are a range of other pollutants which have impacts on people's health that need to be considered, including particulate matter. These various pollutants can have a range of sources including transport, boilers, manufacturing and construction processes. The city's Air Quality Action Plan (currently being updated), includes local targets for air quality that are more stringent than national targets and it is important that new development is aligned with this.

The policy options set out include requirements for undertaking air quality assessments and demonstrating that proposals have considered the range of pollutant sources during operation but also construction and that any significant impacts on air quality are mitigated. There is also an option for requiring new development to align with the city's locally set air quality targets as outlined in the latest Air Quality Action Plan. There is also an alternative option of having no locally set policy on air quality.

Table 5.1: Policy options set 009a: Air quality assessments and standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require Air Quality Assessments (AQAs) for all major developments, and any other development considered to have a potentially significant impact on air quality. The AQA must consider all the different sources of air pollution during operational and construction phases (including but not limited to: transport, heating, dust generated from construction activities, etc). Any resultant significant impacts on	Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality across Oxford is key to safeguarding public health and the environment. The whole of the city was declared an AQMA in September 2010. A policy in the Oxford Local Plan can influence and seek improvements in air quality at both a local and strategic level. For example, the encouragement of active travel options reduces dependence upon use of private cars, the majority of which are currently	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

air quality inside an AQMA must be mitigated.	non-electric vehicles (EVs). The Air Quality Action Plan (AQAP) has been produced as part of the City Council's statutory duties and it outlines actions to be taken to improve air quality in Oxford 2021-2025. Key objective is to bring NO2 emissions into legal compliance as soon as possible and to go beyond legal compliance.	
Option b Require all new major developments within the city's AQMA to comply with the locally-set, more stringent, air quality standard for Nitrogen Dioxide (NO2) set out in the city's latest air quality action plan (AQAP) (currently a target of 30µg/m3) as well as compliance with current national air quality objectives (unless superseded by local standards).	This target would set an ambitious standard for accepted Nitrogen Dioxide emissions from all new development in recognition of the rigorous target the City Council has set locally within its Air Quality Action Plan (AQAP). The standard would potentially become more challenging if the AQAP is updated with tighter standards in future. The target is currently 10ug/m3 lower than the UK's current annual mean limit value for this pollutant.	A more stringent target will set a higher standard for new development in the city which could be considered more onerous for applicants. This is an additional standard to the requirements that developments currently follow in the current local plan.
Option c Do not include a policy about air quality assessments but rely on other regulatory regimes.	None identified	This option is not considered to be reasonable due to the poor air quality across the city, and the whole city already covered by an AQMA. Relying upon national legislation ignores the Oxford context and the city's ambition to go beyond national targets.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or a+b, or c **High-level screening conclusion? -** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No

Rationale: These options are about whether to set local policies about air quality (options a and b) or to rely on national policy and regulatory regimes (option c). The whole of Oxford is covered by an Air Quality Management Area (AQMA) so air quality is a sustainability issue of particular relevance to Oxford. Historically there have additionally been air quality 'hotspot' areas identified, where pollutant levels were of even greater concern than the rest of the city, although in recent years the levels at the majority of these hotspots have now reduced significantly as a result of various measures to improve air quality (as set out in the Oxford Air Quality Action Plan), such that they no longer warrant bespoke policy measures for those areas. The AQAP sets more stringent targets for air quality than national targets, and as the monitoring in the AQAP report sets out, those more ambitious targets are being met in recent years, so it would a reasonable approach for LP2042 to continue to set ambitious targets to tackle the issue of air quality.

In terms of sustainability impacts, options a and b could potentially help to meet **criterion 8 reduce traffic and associated air pollution**, because although the options aren't about traffic, they encourage consideration of air pollution and as emissions from transport are one of the biggest contributors in Oxford then any AQA would need to consider the operational impacts which would include transport (as well as other sources of air pollutants). This is partly however subject to implementation. Option b is likely to have the greatest positive impact because that sets stringent targets whereas option a only requires consideration of air quality but does not set targets. Option c would be neutral because it does not go beyond the national policy baseline and sets no targets, however emissions from transport are likely to continue to reduce under this scenario as the national transition away from fossil fuel transport and heating sources continues. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

686

Policy options set 009b (draft policy R5): Water quality and resources

The city is subject to various issues impacting the water environment. Oxford is in an area of water stress and this stress is likely to increase due to climate change, meaning that it is imperative that new development uses water prudently and minimises waste. Equally, watercourses around the city are subject to pollution from various sources which impact on their ecological status, some of which is associated with the development process (e.g. urbanisation increasing pollutant run off; pressures on wastewater systems leading to sewage discharges). Whilst the Local Plan cannot fully protect or mitigate all of the ongoing challenges facing the water environment (which is subject to actions carried out by stakeholders across the wider catchment), it can help to ensure that the impacts from new development are fully considered and appropriately mitigated.

Various design choices can help to address pressures on the water environment, from the way services and water fittings are implemented within buildings, to the way that green infrastructure and sustainable drainage systems are incorporated in

areas around buildings. As such, one option would be to ensure that considerations affecting water are spread throughout relevant policies of the Local Plan to ensure a wholistic approach to assessing new development. Alternatively, because issues impacting the water environment are so pronounced, and subject to increasing concern, it may be more appropriate to include a bespoke policy addressing these requirements, though there may be some repetition/crossover with other policy areas. The options also include requirements for separating foul and surface water in when designing drainage for new sites, to reduce pressure on the sewage system.

Table 5.2: Policy options set 009b: Water quality and resources

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a bespoke policy on water resources and water quality. This would include various requirements such as requiring measures to limit water use and conserve water, including meeting the tighter Building Regs water use limits. Also, measures to mitigate impacts on water quality, such as use of Sustainable Drainage Systems (SuDs).	Ensures that water quality is addressed separately in any development. Having a bespoke policy is a clearer way of presenting the various requirements for water use and water quality for applicants and also decision makers, and transparently demonstrating compliance with Water Framework Directive requirements.	This could result in unnecessary repetition in the Local Plan and additional information being prepared for a proposal that would have already been undertaken as part of the SuDs design, and would have already been considered in assessing any potential impacts of the proposal on water quality.
Option b Do not have a bespoke policy but instead incorporate water resources/ quality considerations into	This approach ensures that water quality is addressed through approaches such as: ensuring water use is limited to certain standards in new development through resilient design and construction; the use of SUDs in development; and the provision of evidence in any planning	Previous feedback on the Local Plan 2040 from the Environment Agency flagged concerns about this approach including that there was potential for it to result in elements of water quality being overlooked. It is also potentially a more complicated way of

other policies about managing the impacts of development.	application submitted which demonstrates that there would not be a negative impact on water quality.	presenting the policy position rather than having a bespoke policy.
Option c Expect that foul water is separated from surface water drainage on development sites. Require a Foul and Surface Water Drainage Strategy for all new build residential development and non-residential development above a certain threshold.	Would ensure that appropriate consideration is given to foul water drainage and how this is handled on site regarding sewer system. Would ensure that design of foul water drainage is appropriately informed by strategy on larger developments.	Additional requirements placed upon developers in order to achieve planning permission.
Option d Do not include any policy direction about water quality but rely on other regulatory regimes and national policy.	The NPPF includes high level guidance about water quality and drainage (paragraph 182).	Would not address Environment Agency concerns raised at LP2040.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a or b or d (they are alternatives) or combination with option c **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal? -** No **Rationale:** These options are about whether to set local policy requirements about water quality (options a or b) or to rely on national policy and regulatory regimes (option d). Option c would require additional information to be submitted in relation to foul and surface water drainage which is important for reducing impacts on sewer network. Options a, b and c would score positively for **criterion 9**

water quality targets, but option a would set out the requirements in a single policy whereas in option b the issue of water quality would be woven into other relevant policies through the plan (the requirements themselves are not expected to differ, the choice is principally in how they are presented). Option d will be neutral in some respects because there are regulatory regimes that should prevent deterioration of water quality in various ways, alongside Thames Water's own responsibilities for addressing this challenge, however, there could potentially be some negative impacts where national standards are not considered enough, particularly in light of known challenges with water quality in the city and this makes this option unlikely to be reasonable to take forward. Overall, it is considered that the sustainability impacts from the options do not differ significantly enough to warrant them being scoped in for further detailed appraisal.

Policy options set 009c (draft policy R6): Soil quality

Earlier sections of the background paper identify that construction practices and inappropriate design of new development can have harmful impacts for soils, of which Oxford has varying quality. Soils are important for providing a range of benefits, from supporting green infrastructure and habitats, to flood storage and locking up carbon. In particular, Oxford has several areas of particularly valuable peat deposits, which are especially important carbon sinks as well as sources of archaeological deposits. Whilst existing mapping identifies several recorded deposits, there is potential for additional areas of deposits in undeveloped land nearby which have not been officially recorded.

The options set includes an option for setting out requirements to ensure new development considers its impact on soils, regardless of their quality, and seeks to adapt design and construction practices to help ensure sustainable management of soils and mitigate harmful impacts. In addition, there is an option for having additional requirements in relation to protecting peat reserves because of their particular range of benefits they provide, which would focus on the known peat deposits, but could also incorporate requirements for investigating and addressing potential undiscovered deposits nearby.

Table 5.3: Policy options set 009c: Soil quality

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out requirements/principles for conserving and enhancing soils.	Construction practices, including use of heavy machinery, below ground construction and reworking of soil layers can have detrimental impacts on long-term health of soils. Incorporating standards within policy to guide design and	Different sites and types of proposed development will result in a variety of considerations and different solutions that will be needed. Unlikely to be a one-size-fits-all solution that a policy could guide applicants towards.

	construction would help to ensure the least impactful practices are followed wherever possible to avoid and mitigate impacts. Preserving soil health could help to secure multiple benefits in the long term, including for biodiversity, flood risk (improved flood storage) and climate change (healthier soils can better lock up carbon).	Asking applicants to tailor construction processes to avoiding impacting soil quality e.g. through avoiding loss, erosion, compacting soils with heavy machinery is likely to impose additional challenges for design and construction and potentially incur additional cost and resource.
Option b Set out additional standards for the protection of peat reserves including no loss/dewatering of these reserves.	This approach would help to ensure that some of the most valuable types of substrate, not only for locking up carbon, but also archaeological remains, are preserved where they still remain. This is particularly important as peat deposits take a significant period of time to develop. The most pragmatic approach would be to focus this policy requirement on the known areas of recorded peat deposits in the city according to public mapping from Natural England with a precautionary buffer area, whilst treating the surrounding areas with an element of caution, focusing requirements for additional investigation only to proposals on undeveloped sites in the vicinity.	Known, publicly accessible mapping of peat reserves that applicants could rely upon is potentially patchy. Whilst it seems most appropriate to focus requirements for additional investigation to areas within or around recorded deposits, the approach could potentially miss out on unknown deposits located more widely across the city. Requirements for additional investigations within the buffer zones to known reserves will incur additional cost and resource from applicants, though this could be reduced by focusing on undeveloped land where potential for underlying peat is potentially higher.
Option c No additional policy for addressing soil quality or protection of peat.	None identified	National policy is fairly limited in guidance for conserving soils and peat so a lack of local policy may lead to further deterioration and loss of peat (which is effectively irreplaceable).

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option A, B, A+B, or C **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

Rationale: The options represent varying levels of protection that local plan policy could provide for soils, with option a setting out general requirement and guidance, and option b setting out additional protections for peat reserves (which could theoretically be standalone or in combination with option a). Option c would mean setting no local policy.

The sustainability impacts relate most directly to **SA criterion 3. Efficient Use of Land** with option a and b representing minor significant impacts for protecting soils. Admittedly, the additional protections for peat could have negative impacts for the same criterion at the site scale in a select number of locations in the city where development capacities of sites in proximity to peat reserves could be limited by their additional protection (although these circumstances are expected to be quite limited). Option b would also represent an additional indirect positive impact for **criterion 1. Carbon Emissions** because it would help to ensure that the most carbon-rich reserves recorded in the city (peat reserves are typically significant carbon sinks) would be protected from further loss arising from the development process – although these resources are not factored into the city's specific net zero target roadmap. Option c is likely to be a minor negative impact for criterion 3. in relation to soil quality because there is little specific guidance in national policy alone that development would need to follow, thus without local guidance development has a far greater likelihood of coming forward in ways that degrade soils. The same is likely true for criterion 1. although the impact of option c may be closer to neutral in this regard as peat reserves in the city do tend to occur near to waterbodies or within areas of green space that mean they may benefit from additional protections that could mitigate some of the harm, although these are not specific to conserving below ground deposits like peat. Overall, the sustainability impacts are unlikely to be significant or to differ much between the options and screening in for detailed appraisal is not considered necessary.

691

Policy options set 009d (draft policy R7): Contaminated land

Many of Oxfords past major industrial sites have been subject to remediation to address potential land contamination in the past, however, there is potential for additional contamination on smaller sites across the city due to Oxford's long history of settlement. Whilst national policy already sets various requirements for developers to address contamination, there is the option to set out specific local policy expectations for ensuring that potential contamination investigated and appropriately mitigated, with the alternative option being not to include a local policy at all.

Table 5.4: Policy options set 009d: Contaminated land

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option a Include a policy that requires the submission of details of investigations of any site suspected to be contaminated and details of remedial measures which must then be carried out.	This would be a continuation of the existing policy (currently set out in policy RE9). This approach ensures that there will be no threat to the health of future users or occupiers and no adverse environmental impacts.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.
Option b Do not include a policy about land quality but rely on national planning policy and other regulatory regimes.	NPPF includes general policies about ground conditions and pollution and remediation.	This option is not considered to be optimal as the relatively large proportion of brownfield sites in Oxford means that there are more sites with potentially contaminated land than in other areas.

692

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The options presented are either to have a local policy that requires applicants to demonstrate they have sufficiently investigated potential for land contamination where relevant (and carried out sufficient remediation) or not to have a local policy. In terms of sustainability impacts, the options relate most directly to SA **criterion 3. efficient use of land** and would also indirectly impact upon **5. Inequalities** (in relation to impacts on health). Option a would likely have a minor positive impact for criterion 3. in that it would allow for the efficient reuse of brownfield land through ensuring the previous contamination is investigated and remediated, ensuring this land can be brought back into use. It would have neutral or slight positive impacts for criterion 5. in that it would help ensure any harm to future occupiers' health is avoided, though the sites may not have been suitable for redevelopment at all without appropriate action to address any existing contamination too. Option B is likely to have a neutral impact across the criteria, as there is at least national policy guidance about addressing contamination, as well as other environmental quality legislation. The options are not considered to have significant sustainability impacts to warrant further detailed sustainability appraisal.

Policy options set 009e (draft policy R8): Amenity and environmental health impacts of development

The constrained nature of the city means that development is often coming forward in close proximity to existing uses with various amenity implications where design has not considered this existing context. New development can have various impacts either as part of the construction process, or once in operation, particularly in relation to noise, dust and vibration, but also in other respects, such as glare, emission of pollutants and other forms of nuisance. These impacts can affect not only people but also the wider environment. Equally, the operation of existing uses nearby can impact upon users of a new development if a proposal is brought forward without due consideration. These existing uses may mean appropriate mitigation needs to be incorporated as part of the new development to ensure a reasonable and healthy environment for new occupants.

Some of these considerations, particularly those arising from the construction process and transport movements, will be factored into the production of construction management plans which would be required elsewhere in the Local Plan (discussed more in background paper 012/ draft policy C6). However, an option has also been considered for a broader amenity policy that could address these issues as a whole, alongside an option not to include a local policy.

Table 5.5: Policy options set 009e: Amenity and environmental health impacts of development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc. Continue to require that impacts of developments must be mitigated to ensure that the amenity of communities, occupiers	This approach ensures that any potential threat to the residents, future occupants and existing communities from the development are assessed and mitigated appropriately. This is not a prescriptive policy but one that ensures that the impacts of development are comprehensively considered and mitigated where applicable. This option should provide greater protection to the health and wellbeing of the population.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

and residents are protected.		
Option b Do not include a policy but rely on national planning policy and other regulatory regimes.	Relying on regulatory regime would be familiar to developers and not unreasonable burden.	Regulatory regimes may provide the minimum standards of protection, however, having a local policy helps to ensure the impacts of development are properly considered and assessed in the local context of Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** One option is to include local policy that sets standards for protecting amenity and environmental health from the impacts of new development, and the other is to not include a local policy. The nature of this policy option set is that it is likely to impact upon a range of SA criteria such as **8. traffic and associated air pollution, 9. Water Quality, and 5. Inequalities** (the health element of this), due to the broad range of considerations it addresses. However, as it is focussed on ensuring mitigation to avoid negative impacts from new development this is likely to result in neutral impacts overall for these criteria. Option b would potentially therefore result in minor negatives for the same criteria, where development could come forward and cause amenity/environmental health consequences, however, this impact is mitigated by the presence of various other types of environmental health legislation and national requirements that could reduce these negatives, although it is less likely these would align with local objectives. Overall, the sustainability impacts of the options are not significant or different enough from each other to warrant further detailed appraisal.

6. Conclusions including preferred approaches for Local Plan 2042

Addressing the quality of Oxford's air, land and water is an important set of considerations that will need to drive the new Local Plan in order to improve the environment that we live and work in. There are a variety of challenges facing the city now and in future in relation to each of these dimensions of the environment, and the policies of the Local Plan can help to ensure that new development mitigates any impacts that could further exacerbate these.

Key sustainability issues for the Local Plan to address:

Air quality:

- There is a city-wide Air Quality Management Area (AQMA) as well as constraints on new development arising due to potential air quality impacts on Oxford Meadows SAC.
- Tackling congestion, for example by reducing journeys to and within Oxford by motorised traffic would help improve air quality.
- Encouraging uptake of low and zero emission vehicles, in particular buses and taxis which will continue to need to access the city centre.
- Tackling emissions from domestic and non-domestic sources is likely to improve air quality.

Soils/Land contamination:

- Higher costs associated with dealing with contaminated sites could increase pressure to develop greenfield sites.
- Prioritising brownfield land for development may reduce opportunities for the remediation of contaminated sites which could be repurposed for public amenity or as green infrastructure with a focus on ecological/biodiversity functions.
- Protection of soils from pollution arising from new development as well as degradation from development/construction processes.
- Protection of carbon-rich peat reserves that have already been degraded by historic development in the city and supporting their restoration where possible.

Water resources and quality:

- Oxford is already in an area of serious water stress.

- Water resources could be further challenged in future due to climate change and increased demands from population growth. Additional focus on water efficiency measures will need to be looked at through the plan-making process.
- Capacity concerns in wastewater treatment infrastructure could lead to additional pollution from wastewater and impact local water bodies. This may have knock on implications in terms of the Water Environment Regulations.
  Pollution into waterbodies from other sources, such as urban run-off and agricultural practices, is an ongoing challenge over which planning policies have varying levels of influence.

6.1. Preferred approaches for the Local Plan 2042

Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address which relate to air/water/land and soil quality, as well as amenity and environmental health more generally. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Air quality assessments and standards – Draft policy R4

The preferred approach for the Local Plan 2042 policy is to have a local policy that addresses air quality so as to ensure that impacts on health, particularly for the most sensitive groups, are fully considered and that progress on improving the city's air quality continues. This recognises that this issue is an important one locally, as well as a particular objective to be addressed by the new Local Plan, and responds to the ongoing AQMA designation which covers the entire city.

This means a combination of **options A and B**, with option A helping to ensure that new development fully considers the issues of relevance in relation to existing air quality issues in the area, but also how a proposal could be impacted by this or could impact upon it via submission of an Air Quality Assessment. Option B will also help to ensure that new development is designed in a way that is aligned with the city's local objectives for addressing air quality, including aligning with the local air quality targets which are tighter than national targets in relation to Nitrogen Dioxide (for which past exceedances are the reason for which the city's AQMA designation is in place).

Water quality and resources – Draft policy R5

Again, the preferred approach for the Local Plan 2042 policy is to have a local policy that addresses the issues of water resources and water quality. Whilst the local plan will not be able to fully address the various stressors on the water environment which arise from various sources such as climate change, pollution from land use management like some agricultural practices, as well as the actions of stakeholders beyond the city, it can still help to ensure the impacts from new development are appropriately considered and mitigated. Previous feedback on the Local Plan 2040, which proposed addressing water issues across various policies instead of one policy, suggested that stakeholders such as the Environment Agency wanted to see a bespoke policy which would provide more clarity and better signpost this as a key issue facing the city.

As such, the preferred approach is a combination of **Options A and C. Option A** will mean setting out a policy with various requirements for how development should address conserving water, including that they follow the optional tighter standard for water use limits, as well as incorporating other water saving measures. It also means including requirements for how water quality should be preserved, which would have overlap with other policies in the plan such as use of sustainable drainage measures. The preferred approach would also include **option C** which is to ask applicants to ensure foul water is separated from surface water in drainage systems, which can help reduce the strain on wastewater systems, and, on larger developments, go further and ensure their application is supported by a foul and surface water drainage strategy which can fully set out how these issues have been considered.

Soil quality – Draft policy R6

To ensure impacts on soils are fully considered and opportunities for sustainable soil measures incorporated, the preferred approach is to follow **Option A and B** and include a local policy on soil quality. **Option A** will allow the Council to set out various principles which applicants will need to follow, depending on the context of the site. This should help to ensure that future development mitigates impacts on soils as much as possible and ensure the issue of soil quality has greater prominence than in the current Local Plan.

In addition, **Option B** would help to respond to concerns flagged about the Local Plan needing to protect remaining peat reserves in the city as part of the previous Local Plan 2040 preparation and would recognise the particularly important role these deposits serve as carbon sinks and sources of archaeology which will be hard to replace if lost. It is acknowledged that mapping of peat reserves in the city is subject to some uncertainty, however, the focus on the recorded reserves according to publically accessible Natural England mapping would be bolstered by a buffer zone that seeks to ensure proposals nearby sufficiently investigate potential for peat on their sites and respond accordingly.

Contaminated land – Draft policy R7

Whilst national policy is already fairly strong on requirements for considering contaminated land, the preferred approach is to follow **Option A** and set out a local policy for addressing contaminated land. This would allow the Local Plan to clearly set out the specific local context of contamination in Oxford and provide applicants with a steer on the Council's expectations for how potentially contaminated sites are investigated and remediated.

Amenity and environmental health impacts of development – Draft policy R8

Again, the preferred approach for the Local Plan 2042 is following **Option A** to include a local policy on amenity and environmental health impacts of development. This recognises that the nature of the many constrained sites in the city means that applicants need to consider a variety of impacts from their development on the surrounding area and vice versa and allows the Council to set out the key issues it wants to see applicants address.

The local policy can help ensure issues like noise, dust and vibration are considered as well as other impacts, to ensure that amenity for occupiers and neighbours as well as impacts on wider environment are sufficiently mitigated, although not all issues will be relevant to all applications. There is likely to be some crossover with other policies, such as the requirements for Construction Management Plans, however this policy would address broader issues like the impacts arising from the development once in operation too (not just the construction stages). Without a local policy, some of these considerations risk being missed, or not being sufficiently addressed upon submission of an application, potentially delaying the decision process.

Background paper 010

Title: Health and Wellbeing

This paper addresses: Regeneration, geographical spread of new development, accessibility of areas deprivation, availability of green space in areas of deprivation and availability of essential services/facilities in areas of deprivation.
Relevant Local Plan Objectives: • Provide access to affordable, high-quality and suitable accommodation for all. • Curate a built environment that supports and enables people to be physically and mentally healthy.
SA Objective(s): 5. To reduce poverty, social exclusion, and health **inequalities**.
SEA theme(s): Human health, population, material assets.

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 2

National guidance documents 3

The Marmot Report and 2020 update 3

Marmot Places 3

Regional supporting strategies 4

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 6

Isolation and loneliness 8

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 13

What trends do data show? 13

Health and wellbeing in the context of the climate emergency 13

Considerations for the new Local Plan 14

5. Options for Local Plan 2042 policy 16

Policy options set 010a (Draft Policy HD10): Health Impact Assessments 17

Policy Options Set 010b (Draft Policy HD11: Privacy, Daylight and Sunlight) 18

Policy options set 010c (Draft Policy HD12:) Internal Space Standards for Residential Buildings 20

Policy Options Set 010d (draft Policy HD13): Outdoor Amenity Space 21

Policy Options Set 010e (Draft Policy HD14): Accessible and Adaptable Homes..... 23
6. Conclusions including key sustainability issues 24
6.1. Preferred approaches for the Local Plan 2042..... 26

1. Introduction

1.1 The causes of poor health and wellbeing do not arise by chance and cannot be explained by genetics alone. It is now recognised that the built environment can have a significant impact on health and health inequality. The way that areas are designed and constructed can have a tangible impact on many of the wider determinants on health and wellbeing, such as peoples' activities, communities, economies and lifestyles.

1.2 Furthermore, health is not consistent across the population and stark inequalities often exist across population groups, even over small areas. Health and wellbeing are strongly correlated with levels of socio-economic deprivation, for example, with those living in the most deprived areas typically facing worse health inequalities compared to those living in less deprived areas.

1.3 As such, there are many indicators of health and wellbeing which can be influenced by planning. This paper highlights a range of physical and mental wellbeing indicators, which together begin to build a general overview of the health of Oxford's population.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

2.1 The **National Planning Policy Framework (NPPF)** updated in December 2024 is explicit in its support for healthy place shaping. It states in paragraph 96 that:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

2.2 The NPPF further seeks to promote healthy lifestyles and wellbeing with requirements that have implications for placemaking, including restrictions on the location of hot food takeaways (paragraph 97), positive planning for the provision of share spaces and community facilities, avoiding the unnecessary loss of such facilities, and ensuring an integrated approach to considering the location of housing, economic uses and community facilities (paragraph 98).

2.3 **Planning Practice Guidance (PPG)** sets out that plan-making bodies will need to discuss emerging strategies early with bodies such as NHS England and local clinical commissioning groups, while maintaining an awareness of the potential impacts of development on health infrastructure.

National guidance documents

2.4 **NHS England Long Term Plan (Jan 2019)** aims to ensure that the nation's future health is given high regard when planning and designing places. "*Wider action on prevention will help people stay healthy and also moderate demand on the NHS. Action by the NHS is a complement to – not a substitute for – the important role of individuals, communities, government, and businesses in shaping the health of the nation*". Lessons have already been learned from healthy new town demonstrator sites around the UK and principles for healthy place making have been incorporated into the NHS 'Putting Health into Place' guidance.

The Marmot Report and 2020 update

2.5 The Marmot report of 2010 "Fair Society, Healthy Lives" stated that there must be prioritisation of policies that both reduce health inequalities and mitigate climate change by improving active travel, the availability of good quality open and free spaces, the food environment in local areas and energy efficiency of housing across the social gradient. It also suggested that planning, transport, housing, environmental and health systems should be fully integrated to address the social determinants of health in each locality.

2.6 Ten years on from that review, an update published in 2020 by the Institute of Health Equity, highlighted various negative observations on health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health. It highlighted that the original recommendations made in 2010 are still relevant, and increasingly so, in many cases.

Marmot Places

2.7 The Institute has promoted the concept of 'Marmot Places', which are areas where local authorities and policy makers recognise that health inequalities are largely shaped by the

social determinants of health and pursue policies and interventions that aim to improve health equity. Such interventions are based on the 8 Marmot Principles, and there is a commitment by such places to improve health equity over the short, medium and long term by:

1. Developing and delivering approaches, interventions and policies to improve health equity.
2. Strengthening their health equity systems.
3. Involving communities in the identification of the drivers of poor health and in the design and implementation of actions to reduce them.
4. Broadening advocacy on health equity and engaging with other Marmot Places to share knowledge, roll out best practice alongside partners in local regions and nationally.

Regional supporting strategies

2.8 The **Oxfordshire Joint Health and Wellbeing Strategy (2024-2030)** sets out how the NHS, Local Government and Healthwatch will work together as the Oxfordshire Health and Wellbeing Board, to improve health and wellbeing in Oxfordshire. The vision of this strategy is:

"To work together in supporting and maintaining excellent health and well-being for all the residents of Oxfordshire"

2.9 To achieve this vision, the Health and Wellbeing Board propose to focus on:

- *Agreeing a coordinated approach to prevention and healthy place-shaping.*
- *Improving the resident's journey through the health and social care system (as set out in the Care Quality Commission action plan).*
- *Agreeing an approach to working with the public so as to re-shape and transform services locality by locality.*
- *Agreeing plans to tackle critical workforce shortages.*

2.10 Cutting across all of these priorities is a commitment to shift the focus to the prevention of ill health, reducing the need for treatment and care whilst also tackling health inequalities.

2.11 **Oxfordshire Local Industrial Strategy (July 2019):** Oxfordshire's LIS Vision Statement aims to position Oxfordshire as one of the top three global innovation ecosystems by 2040, building on the region's world leading science and technology clusters to be a pioneer for the UK in emerging transformative technologies and sectors. The LIS recognises the importance of planning for the health and well-being of communities and integrating the concept of healthy place shaping in developing communities. It also recognises the importance of 'inclusive growth' to ensure that the benefits of economic growth are felt by

those in more deprived communities, thereby addressing the problem of income inequality that is a key cause of health inequalities.

Local Transport Connectivity Plan 2022-2050 (LTCP5)

2.12 The LTCP5 was published in July 2022 and follows on from the previous **Local Transport Plan 2015-2031 (LTP4).** The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there. The objectives of the strategies are to reduce the need to travel, reducing reliance on individual private car use and promoting alternative modes such as walking, cycling and public or shared transport as natural first choices.

2.13 There is a greater emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

2.14 There are direct implications on public health and wellbeing, and the policies specifically focus on healthy place-shaping. The creation of liveable neighbourhoods, that are made up of communities where social connections are easy and local amenities and services are readily accessible, and where active travel (walking, cycling) is a viable option and car journeys are minimized. There is a greater ready availability of public or shared transport, and an environment that incentivizes active travel. The promotion of a net zero or 'decarbonised' transport network can also have impacts in terms of air quality.

2.15 **The Joint Strategic Needs Assessment Annual Summary Report 2023:** The Joint Strategic Needs Assessment (JSNA) monitors trends in the health and wellbeing of Oxfordshire's population and assesses changing patterns of need and demand for services across the county. Much of the data set out in this paper is taken from this report.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Levels of General health

3.1 Figure 3.1 shows a higher percentage of people in Oxfordshire report good or very good health than in the South East or in England. Oxford has a higher level of people reporting good or very good health than the national and regional average, but at a lower level than the last reporting in 2021. Compared across the county, Oxford has a lower level than West and South Oxfordshire districts.

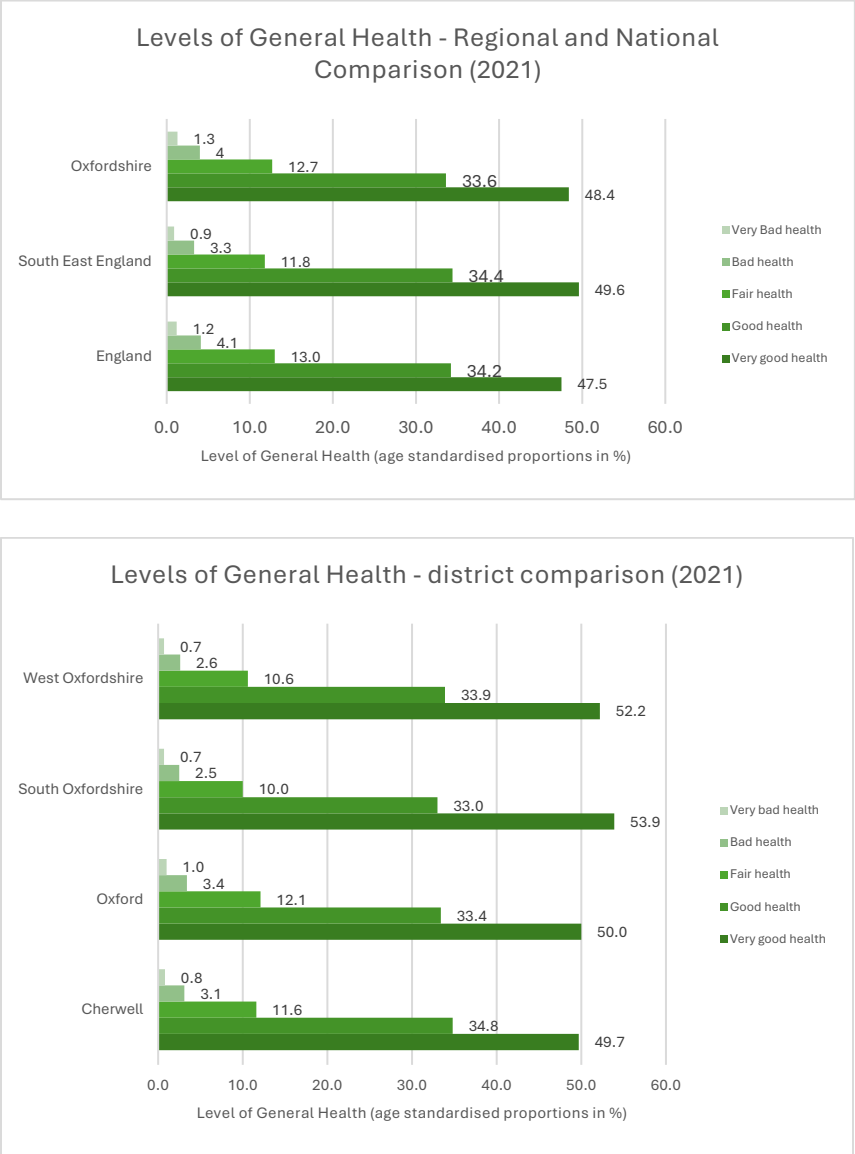

Figure 3.1 - Level of reported health – regional and national comparison (Census 2021)

3.2 Figure 3.2 shows a range of health indicators and how Oxford compared to the benchmark of South East England and nationally. For several indicators, Oxford performs better than the benchmark, for example for life expectancy at birth (female), percentage of physically active adults, and Year 6: prevalence of obesity (including severe obesity).

Indicator	Period	Oxford			South East	England	England		
		Recent Trend	Count	Value	Value	Value	Worst	Range	Best
Life expectancy and causes of death									
Life expectancy at birth (Male, 3 year range)	2020 - 22	–	-	80.3	80.1	78.9	73.4		7
Life expectancy at birth (Male, 1 year range)	2022	–	-	81.1	80.6	79.3	73.8		3.8
Life expectancy at birth (Female, 3 year range)	2020 - 22	–	-	83.9	83.8	82.8	79.0		3
Life expectancy at birth (Female, 1 year range)	2022	–	-	84.1	84.1	83.2	79.2		
Under 75 mortality rate from all causes	2023	→	341	331.3	295.5	341.6	622.1		207.1
Under 75 mortality rate from cardiovascular disease	2023	→	64	64.1	62.1	77.4	136.2		39.2
Under 75 mortality rate from cancer	2023	→	121	122.3	111.7	120.8	186.1		71.5
Suicide rate (Persons, 10+ yrs)	2021 - 23	–	34	8.7	10.4	10.7	20.5		4.2
Injuries and ill health									
Killed and seriously injured (KSI) casualties on England's roads	2023	–	-	-	89.8*	91.9*	-	*Insufficient number of values for a spine chart*	
Emergency Hospital Admissions for Intentional Self-Harm	2022/23	↓	190	92.9	138.3*	126.3	382.6		40.9
Hip fractures in people aged 65 and over	2022/23	→	105	513	509*	558	849		
Percentage of cancers diagnosed at stages 1 and 2	2021	→	227	55.6%	56.2%	54.4%	43.5%		61.7%
Estimated diabetes diagnosis rate	2018	–	-	66.8%	75.2%	78.0%	54.3%		%
Estimated dementia diagnosis rate (aged 65 and older)	2024	→	1,183	67.3	62.9	64.8	45.5		
< 66.7% (significantly)									
Behavioural risk factors									
Admission episodes for alcohol-specific conditions - Under 18s	2020/21 - 22/23	–	15	17.4	28.6*	26.0	75.5		3.8
Admission episodes for alcohol-related conditions (Narrow)	2022/23	↓	463	364	376*	475	856		247
Smoking Prevalence in adults (aged 18 and over) - current smokers (APS)	2023	–	-	7.8%	10.6%	11.6%	26.3%		1.3%
Percentage of physically active adults (19+ yrs)	2022/23	–	-	76.0%	70.2%	67.1%	51.4%		%
Overweight (including obesity) prevalence in adults (18+ yrs)	2022/23	–	-	53.9%	62.8%	64.0%	77.7%		
Child health									
Under 18s conception rate / 1,000	2021	→	23	9.1	10.7	13.1	31.5		1.1
Smoking status at time of delivery	2023/24	→	61	5.5%*	6.8%	7.4%	17.5%		2.8%
Baby's first feed breastmilk (previous method)	2018/19	–	-	-	72.7%	67.4%	-	*Insufficient number of values for a spine chart*	
Infant mortality rate	2020 - 22	–	15	3.6*	3.3	3.9	8.3		1.1
Year 6 prevalence of obesity (including severe obesity) (10-11 yrs)	2023/24	↑	285	21.3%	19.2%	22.1%	31.0%		
Inequalities									
Deprivation score (IMD 2019)	2019	–	-	16.7	15.5	21.7	45.0		5.5
Smoking prevalence in adults in routine and manual occupations (aged 18 to 64) - current smokers (APS)	2023	–	-	*	18.4%	19.5%	54.8%		2.4%
Inequality in life expectancy at birth (Male)	2018 - 20	–	-	9.8	7.9	9.7	17.0		
Inequality in life expectancy at birth (Female)	2018 - 20	–	-	6.5	6.0	7.9	13.9		
Wider determinants of health									
Children in relative low income families (under 16s)	2022/23	→	3,626	14.4%	13.1%	19.8%	43.2%		5.2%
Children in absolute low income families (under 16s)	2022/23	→	2,845	11.3%	10.6%	15.6%	35.8%		4.2%
Average Attainment 8 score	2022/23	–	-	46.2	47.3	46.2	36.1		
Percentage of people in employment	2023/24	→	83,200	78.9%	79.6%	75.7%	47.9%		.1%
Homelessness: households owed a duty under the Homelessness Reduction Act	2022/23	–	439	8.3	10.3	12.4	32.7		2.6
Violent crime - hospital admissions for violence (including sexual violence)	2020/21 - 22/23	–	105	18.5	24.5*	34.3	122.3		6.7
Health protection									
Winter mortality index	Aug 2021 - Jul 2022	–	20	7.5%	8.6%	8.1%	30.1%		%
New STI diagnoses (excluding chlamydia aged under 25) per 100,000	2023	↑	969	594	369	520	3,304		152
TB incidence (three year average)	2020 - 22	–	76	16.1	5.4	7.6	41.3		0.7

Figure 3.2 - Health indicators, Oxford compared to the benchmark of England (Public Health England 2023)

Active Travel

3.3 The latest Sport England data (November 2021-22) shows that Oxfordshire had the highest proportion of adults (39.4%) participating in active travel (at least twice in the last 28 days) of England's counties. Oxford City had a high proportion of adults participating in active travel (60%). West Oxfordshire (32%) was just below the national average (33%).

3.4 £ There has been a rise in active travel in all districts since November 2020-21. However, active travel remains lower than before the coronavirus pandemic which maybe due to changes in active travel because of home working.

Participation in active travel: At least twice in the last 28 days

	Nov 2020/21	Nov 2021/22	Change
Cherwell	23%	33%	+10%
Oxford	51%	60%	+9%
South Oxfordshire	21%	33%	+12%
Vale of White Horse	21%	36%	+15%
West Oxfordshire	20%	32%	+12%
Oxfordshire	28%	39%	+11%
England	26%	33%	+7%

Figure 3.3 - Levels of participation in active travel (Source: Sports England Active Lives Survey via Oxfordshire JSNA 2023)

Isolation and loneliness

3.5 Various national and international research studies have linked social isolation and loneliness with adverse health outcomes, including higher mortality rates. Social engagement has also been found to be a driver of quality of life. The coronavirus pandemic has had a notable impact on the way people live their lives and as such, reported levels of loneliness in Great Britain have increased since spring 2020.

Area	Recent Trend	Count	Value	95% Lower CI	95% Upper CI
England	–	-	22.26	22.02	22.50
Oxfordshire	–	-	24.21	22.32	26.22
Oxford	–	-	29.43	25.61	33.66
Cherwell	–	-	26.70	22.47	31.63
Vale of White Horse	–	-	22.06	17.98	26.88
South Oxfordshire	–	-	21.89	17.77	26.73
West Oxfordshire	–	-	18.98	15.18	23.49

Figure 3.4

Air Quality

3.6 In September 2010 Oxford City Council made an Air Quality Management Order declaring the whole of the city as an AQMA, to include the 7 localised hotspots where pollution levels of nitrogen dioxide have exceeded national objectives. It is one of 13 designated Air Quality Management Areas in Oxfordshire, where air quality objectives are not being met. The latest (2020) modelled air pollution data from DEFRA indicate that sites with the highest readings for Nitrogen Dioxide (NO2) in Cherwell, Oxford and West Oxfordshire have each seen a slight increase since 2020.

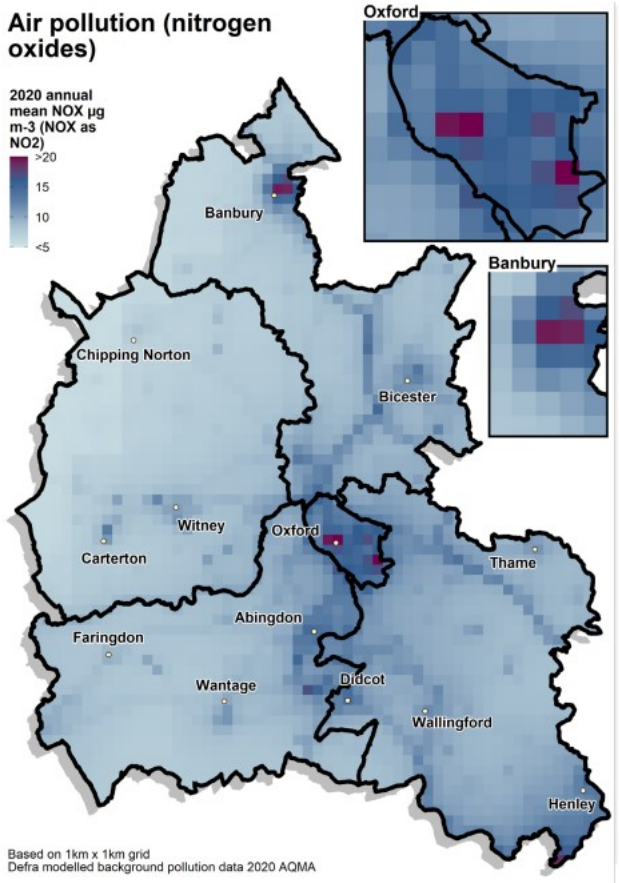

Figure 3.5 - Air pollution in Oxfordshire (Source: Defra modelled background pollution data via Oxfordshire JSNA 2023)

Inequality and health outcomes

3.7 Despite the relative levels of economic prosperity in Oxford, there are still great inequalities within the city. This is reflected in health outcomes and life expectancy. At ward level it can be observed that the life expectancy tends to negatively correlate with the level of deprivation.

Indicator	Period	Oxford			South East	England	England		
		Recent Trend	Count	Value	Value	Value	Worst	Range	Best
Deprivation score (IMD 2019)	2019	–	-	16.7	15.5	21.7	45.0		5.5
Smoking prevalence in adults in routine and manual occupations (aged 18 to 64) - current smokers (APS)	2023	–	-	*	18.4%	19.5%	54.8%		2.4%
Inequality in life expectancy at birth (Male)	2018 - 20	–	-	9.8	7.9	9.7	17.0		
Inequality in life expectancy at birth (Female)	2018 - 20	–	-	6.5	6.0	7.9	13.9		

Figure 3.6 - Inequalities profile, Oxford compared to the benchmark of England (Public Health England 2023)

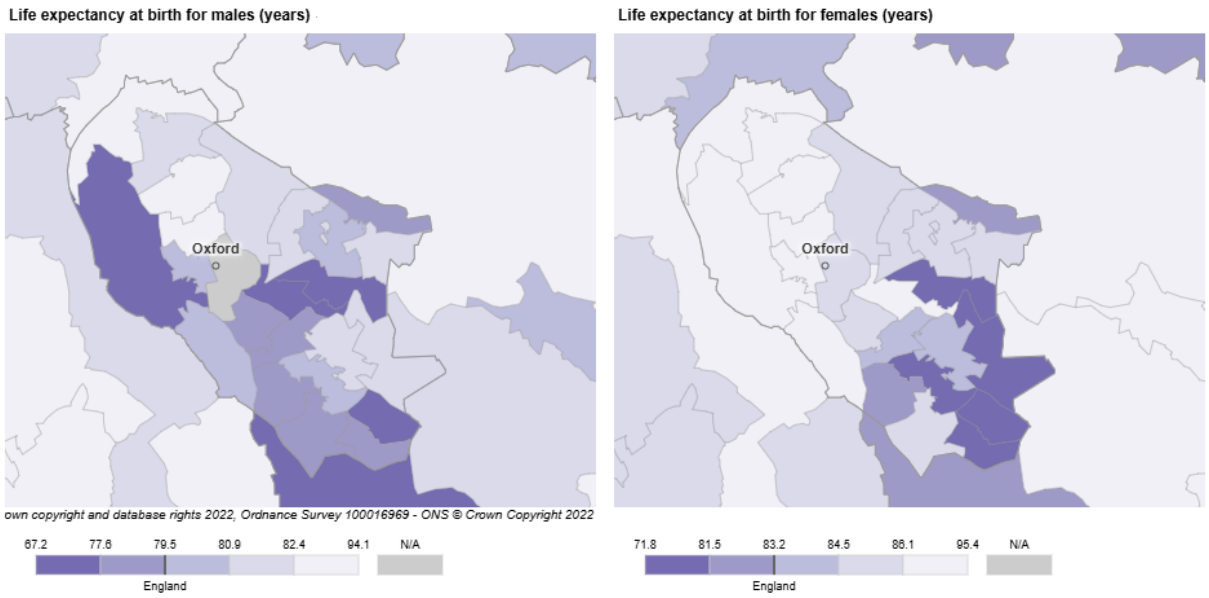

Figure 3.7 - Comparative life expectancy across Oxford wards: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Table 3.1 - Life expectancy compared across wards in Oxford. Source: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Ward	Life expectancy at birth for males	Life expectancy at birth for females
Barton & Sandhills	79.4	81.8
Blackbird Leys	74	80.9
Carfax & Jericho	80.6	90.8
Churchill	76.7	81.1
Cowley	80.2	79.5
Cutteslowe & Sunnymead	81.6	88.5
Donnington	79	83.3
Headington	79.5	85.5
Headington Hill & Northway	81.4	85.5
Hinksey Park	80.6	86.1
Holywell	N/A - not available	85
Littlemore	78.5	85.4
Lye Valley	80.9	81.3
Marston	81.2	85.1
Northfield Brook	77.7	79.7
Osney & St Thomas	77.3	86.3
Quarry & Risinghurst	81	84.9
Rose Hill & Iffley	78.6	82.5
St Clement's	76.1	87.7
St Mary's	79	85.3
Summertown	87	87.1
Temple Cowley	82	83.5
Walton Manor	85.4	89.1
Wolvercote	83.3	90.9

Health Deprivation

3.8 The Health domain of the Index of Multiple Deprivation measures morbidity, disability and premature mortality. Within Oxford, there is wide variation in the level of health deprivation, as shown in Figure 3.8. Areas of the city with high levels of health deprivation include Northfield Brook, Rose Hill & Iffley, St Clement's, Churchill and Blackbird Leys. The majority

of least health deprived areas, as shown by Figure 3.8 are located within the north of the city.

3.9 In 2019, 7 of Oxford's Lower Super Output Areas (LSOAs) fell into the 20 per cent most deprived, and 1 LSOA in the 10 per cent most deprived nationally for Health Deprivation and Disability, compared with 2015, where 12 of Oxford's LSOAs fell within the 20 per cent and 2 LSOAs in the 10 per cent most deprived nationally for HD&D. According to the 2019 Indices of Deprivation (IoD), Oxford's average rank score for Health Deprivation and Disability improved up to 183 from 160 in the 2015 IoD.

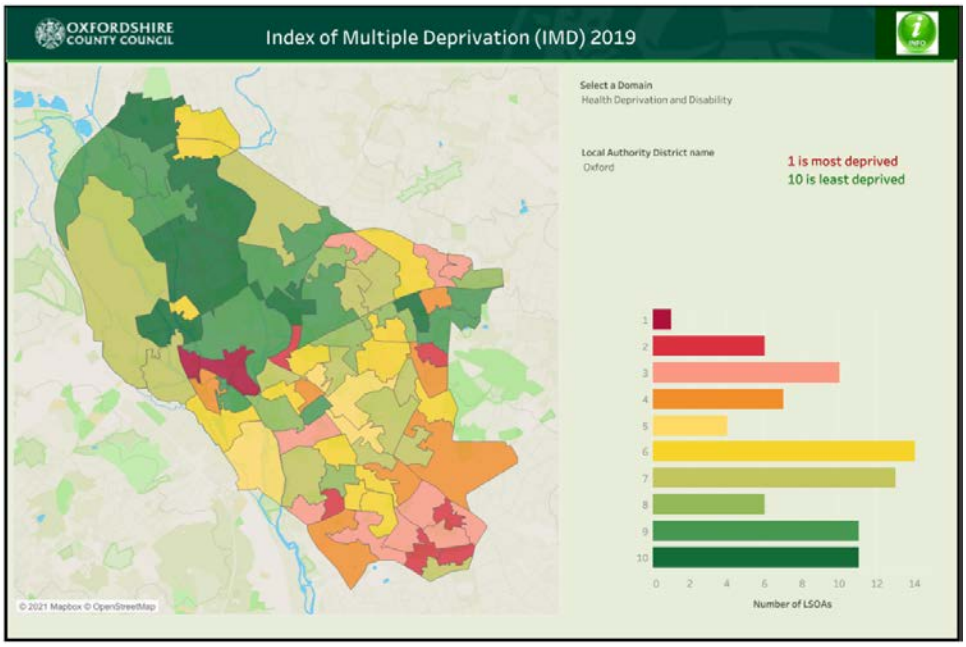

Figure 3.8 - Health deprivation and disability in Oxford (Oxfordshire County Council 2019)

Employment Deprivation

3.10 Being in employment has been linked to improved health and particularly mental health. Figure 3.9 shows the proportion of the working-age population involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities. There are no areas in Oxford within the 10% most deprived areas in England for this indicator, but a number of areas, predominantly in the south of the city, fall within the 20% most deprived areas in England for employment deprivation.

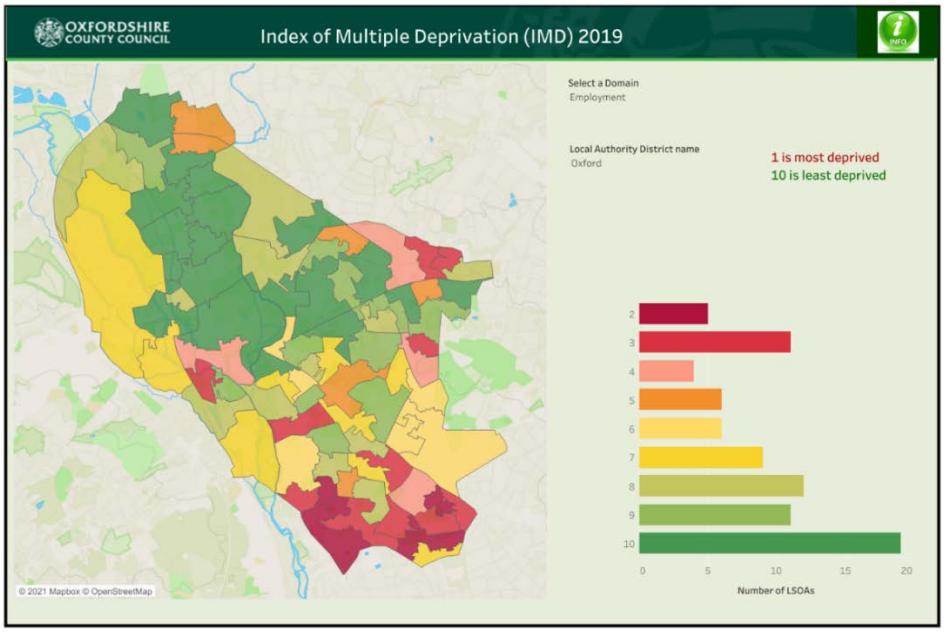

Figure 3.9 - Employment deprivation in Oxford (Oxfordshire County Council 2019)

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

What trends do data show?

4.1 For Oxford as a whole the trends indicate an overall improvement in overall measures of good health, which is likely to be the result of improvements to services and treatments, specific interventions and an increase in awareness and education of lifestyle factors in particular. This is positive when taking into consideration the broader national picture of health and wellbeing in England, which highlights various negative observations of health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health.

4.2 The data does show, however, that there are several areas where Oxford performs below the local or national average, where more focus is needed to secure similar improvements. It also demonstrates that there are significant health inequalities within the city, typically linked with levels of socio-economic deprivation, which need to be a priority for future health interventions and strategies.

5. Health and wellbeing in the context of the climate emergency

5.1 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford, but for those living in poor health, the risks are exacerbated.

Indeed, regardless of our achievements in relation to climate mitigation (cutting carbon emissions), climate is expected to change in the future due to historic greenhouse gas emissions that have already 'baked in' changes in the climate system.

5.2 The impacts of hotter summers and prolonged heat wave events for example have been shown to be particularly threatening for those with pre-existing health conditions such as heart and lung disease, as well as the young and the elderly. The ongoing stress that is caused by flooding events, and just the threat of flooding, can be taxing on residents' mental health and this is likely to be a particular issue for those already in poor mental health.

5.3 Climate-related risks are further compounded by the particular challenges faced by those living in high socio-economic deprivation. As was evidenced earlier in the paper, those living in more deprived areas in the city are more likely to be living with worse health and wellbeing thus potentially being at higher risk from stresses related to climate change. Furthermore, those living in areas of deprivation may have fewer resources (financial and material) to adapt to changing climate, for example finding it harder to afford cooling measures to cope with high heat in the summer, or to pay for insurance that can cover damages during a flood event. There is also the issue that some may be living in poorer quality accommodation, which is ill-equipped to function in future climate.

5.4 Recent research by the Oxfordshire County Council as part of their County-wide Climate Vulnerability Assessment 2024 confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymeade, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas. Six of these wards remain in the top ten for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county).

6. Considerations for the new Local Plan

6.1 Good health includes physical, social and mental wellbeing going beyond simply the absence of illness and care of persons who have become ill. The Local Plan has a role to play in considering all of the aspects that impact on an individual's health and to help influence positive health and wellbeing outcomes across all parts of the city.

6.2 Indeed, health and wellbeing is a wide-ranging topic that will be influenced by many, if not all, of the policies within the Local Plan. The emerging Local Plan aims to integrate health and wellbeing considerations in a variety of areas, including:

6.3 **High quality housing –** The type of housing someone lives in can negatively impact on their health and wellbeing in a number of ways if it has not been appropriately designed. Poorly designed housing that provides inadequate levels of daylight or ventilation; overcrowding; injuries in the home; or inadequate heating or cooling of the building can all

have direct and indirect impacts on physical and mental health. This is an issue that has become more prevalent throughout the Covid-19 pandemic, which saw the population forced to spend greater amounts of time at home in general, as well as for work and exercise. However, housing standards and quality are largely governed by the Government's nationally set building standards and cannot be influenced by local planning policies.

6.4 **Transport and accessibility** – Improving access and movement around the city is important for an individual's health and wellbeing for several reasons. Improving the connections between places can help people to integrate with their communities and reduce the chances of social isolation. Availability, quality and choice of modes of transport are also important not only for facilitating travel to employment, healthcare and social facilities, but also for ensuring people can utilise active travel methods such as walking and cycling, over the car. Transport emissions can also cause adverse health impacts on human health: the local plan can play a role in reducing these and the effect they have on people.

6.5 **Social infrastructure -** Provision of social infrastructure is vital for vibrant neighbourhoods, and this can include uses such as schools; health centres; local food shops; public buildings, local workplaces and open spaces. Neighbourhoods which enable residents to have good access to goods and services and which provides opportunities for social interaction such as in parks can improve social interaction and promote a feeling of community.

6.6 **Natural environment** – The quality of the environment and in particular, access to green space can have a positive impact on health and wellbeing, through increased physical activity and mental health benefits stemming from taking a break from heavily urbanised environments. Healthy environments can also provide opportunities for local food growing which can help promote healthy diets and active lifestyles. Poor air quality can be one aspect of an unhealthy environment and is an important issue in Oxford with impacts on a range of health problems including asthma and cardiovascular diseases.

6.7 **Climate resilience** – Much of what is being built today will be around for the next 50-100 years and thus will need to be able to function and respond to the projected changes in climate that Oxford will face in the future. Development that is able to keep residents cool during warm summer weather will be essential in order to reduce risks from heat stress, whilst flood resistance (keeping water out) and resilience (allowing quick clean up and drying out) measures will help to reduce danger to life and the ongoing stresses that flooding can cultivate. This issue will be particularly important for the most vulnerable communities in the city.

6.8 **Health inequalities** - Whilst working to ensure that negative impacts on health and wellbeing are avoided and positive impacts maximised for everyone, it will also be important for the new Local Plan to work towards reducing the health inequalities that exist in the city. This could take the form of targeted interventions in particular areas in need, as well as ensuring that the issues of health inequality are considered throughout the planning process.

6.9 **Health Impact Assessment** - The current Local Plan requirement for HIAs on new development is likely to remain an important approach to ensuring that developers consider issues of health and wellbeing throughout the development process. Furthermore, to ensure that health and wellbeing considerations have been embedded sufficiently through the Local Plan, the Council's intention is that the development of its constituent policies should be informed by a high level Health Impact Assessment (HIA). There is no single, nationally applied standard for how local plan HIAs ought to be conducted, though there is a range of guidance and examples of best practice that the Council can draw upon. Work being undertaken at the county level will also help guide the approach, and it will also be important to engage with colleagues in Public Health on this process throughout.

7. Options for Local Plan 2042 policy

7.1 The analysis set out in the previous sections of this background paper indicates the need for the Local Plan 2042 to include policies that aim to promote the health and wellbeing of residents in OXford.

7.2 The Plan will therefore include policies that address the following topic areas:

- Provide access to affordable, high-quality and suitable accommodation for all.
- Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to.
- Curate a built environment that supports and enables people to be physically and mentally healthy.

7.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

7.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report).

7.5 Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 010a (Draft Policy HD10): Health Impact Assessments

7.6 The process of undertaking Health Impact Assessment (HIA) ensures that development promotes and contributes to a healthy living environment, by requiring that local context and particular issues are assessed and then addressed through the design process. The benefit of HIA is greatest when it is conducted at the earliest opportunity to inform the design process. The current local plan requires the undertaking of HIA for major development and the options below set out alternative approaches with respect to continued HIA requirements.

Table 7.1 - Policy options set 010a: Health Impact Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require an HIA for all developments over a certain size- for example for major developments (as currently). This requirement could be integrated with others such as demonstrating resilient design and construction.	A checklist based template is straightforward and would keep the process fairly streamlined. The intention of this approach is that healthy design is considered from the outset and therefore factored in.	This may be seen as an extra administrative burden on developers, and on those assessing applications.
Option b Include a requirement for HIAs, not just based on a size threshold but other factors such as socioeconomic, health or environmental factors that could trigger the need for a more extensive HIA. Wider categories for development that will be subject to an HIA.	More development is subject to an HIA, which ensures issues are properly considered and addressed at an early stage of the development.	There is limited evidence that expanding the range of development will bring additional benefits. This may create an onerous process where the drawbacks outweigh any benefits.
Option c No specific policy requirement, rely on NPPF.	Less burden on developer who will cover off the points in an HIA as part of application process.	Not having a policy makes it harder to have a consistent metric to assess schemes.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? A, b or c (they are all alternatives).

High-level screening conclusion? the options are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? No

Rationale:
The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible services/facilities, resilience to climate change etc). Option a and b are likely to have a minor positive impact on inequalites (and option b is likely to be a slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as whilst there is some discussion over what health and wellbeing considerations should factor into planning proposals, there are not explicit requirements, so there is much more potential for development to come forward in unhealthy way. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Policy Options Set 010b (Draft Policy HD11: Privacy, Daylight and Sunlight)

7.7 There are many factors in the built environment that can affect our health and wellbeing, but it is particularly important to ensure that the places where we spend so much of our daily lives, such as our homes and workplaces, enable us to be healthy and happy. The recent Covid pandemic, with the need for social distancing and the shift to home working for some people, has highlighted the importance of having a healthy home setting for us all, and of particular importance to this internal environment is having ample daylight and privacy.

Table 7.2 - Policy options set 010b: Privacy, Daylight and Sunlight

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Extend the policy to also include expectations for daylight, privacy and sunlight for new non-residential buildings (types to be specified but likely to include offices and similar workspaces, potentially healthcare facilities but may exclude manufacturing and	These requirements for non-residential buildings may prevent buildings with a large mass, which would have the benefit of more appealing design. It is also likely to reduce energy use due to minimising the need for electric lighting (and potentially also improving natural ventilation). The working environment would	This may be restrictive to certain building needs or may affect viability due to reducing the potential for subdivision of a building, or for large machinery. Its application is unlikely to be possible universally so the policy must specify when it applies and when it does not.

warehouses, retail units), to ensure good working conditions and to ensure consideration of impacts on neighbouring buildings. This will also need to be considered alongside shading and overheating impacts.	also be healthy. Helps meet BRE sunlight/daylight guidance.	
Option b Include a policy with requirements to ensure adequate daylight, privacy and sunlight to new residential developments.	This would ensure new development provides adequate daylight and privacy and does not reduce privacy and daylight in existing development to an unacceptable level.	This may be too restrictive for certain buildings and/or may impact upon viability due to reducing the potential for subdivision. This needs to be considered alongside considerations of sustainable design and construction, such as avoiding overheating.
Option c Do not include a policy on privacy, daylight or sunlight for any type of development.	This would provide more flexibility for design to reflect the location and other factors.	This could result in poor quality design in new development that does not have sufficient daylight or privacy for its occupants and could reduce daylight or privacy to neighbouring development to an unacceptable level.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A+B, C) **High-level screening conclusion?** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion**.** Option a and b are likely to have a minor positive impact on inequalities (and option b is likely to be a

slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as it may result in a greater potential for poor quality development – building regulations include standards for window sizes/orientation, daylighting design and good practice for daylight levels, however they do not explicitly state minimum requirements for daylight/sunlight or privacy. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Policy options set 010c (Draft Policy HD12:) Internal Space Standards for Residential Buildings

7.8 New homes, whether they are infill plots or on larger sites, need to be of an adequate size and layout to provide high quality functional homes that meet the needs of a wide range of people. The pressure to build more homes can lead to the building of smaller homes if standards aren't set, which could result in housing being built that does not provide future occupants with appropriate living standards.

Table 7.3 - Policy options set 010c: Internal Space Standards for Residential Buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Apply Nationally Described Space Standards. In flatted schemes, require communal areas to be designed to enable neighbours to meet and interact, for example some fixed seating, wider areas of corridor or lobby space.	Following the Nationally Described Space Standards should ensure that developments maximise the useable space within housing through functional layout and provide scope to modify layouts for future needs. Design of developments can be important in helping people avoid social isolation and loneliness. In flats, communal areas that allow neighbours to interact is likely to facilitate successful inter-generational living. Including these standards is important in Oxford because development pressure is so great and heights are constrained, so without requirements housing could be inadequately small.	Oxford is highly constrained spatially and by adopting these standards it could result in reducing the number of houses being delivered. It may become unnecessary to have this policy if the intended national development management policies cover this (which should not be repeated or contradicted in local plans).

Option b Do not include a policy on internal space standards (if the national standards are not adopted locally then they do not apply).	Does not restrict homes being delivered where space is so limited. If space requirements are written into national policy this will become the preferred option as having a local policy will be unnecessary.	Having no space standards for self-contained dwellings could result in the delivery of housing that is of poor quality with an unacceptable amount of internal space for its occupants.
Option c Include a policy but do not follow the Nationally Described Space Standards.	Provides more flexibility for the delivery of new homes which is so urgent in Oxford.	Government policy is very clear that either the nationally described standards are followed or there is no requirement included in plans, so it is very unlikely that this approach could be justified.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Yes **High-level screening conclusion?** The options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion**.** Option c is unlikely to be justified, as it will contradict current national policy and if implemented will most likely encourage the development of schemes with poor quality of space for occupants. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

Policy Options Set 010d (draft Policy HD13): Outdoor Amenity Space

7.9 The adequate provision of outdoor amenity space is important as it supports the physical and mental health and wellbeing of residents. Well-designed outdoor amenity spaces enhance the immediate and surrounding areas and provide much needed open spaces for residents, particularly those who do not have access to their own private garden.

Table 7.4 - Policy options set 010d: Outdoor Amenity Space

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**

Option a Include an outdoor amenity space requirement for all residential units, with size standards. This could allow flexibility between communal and private space and balconies would be included to ensure flats are deliverable. Include a requirement for outdoor areas where neighbours can meet or interact.	This would ensure that outdoor amenity space provided as part of new development would be well designed and provides more certainty about the level of provision. Requiring space for meetings and interactions may help to reduce loneliness and social isolation.	This could be too prescriptive, and the amount required may not be deliverable or viable. There is no requirement currently for communal outdoor amenity space for flats- it may be hard to know how to set this in a way that can be justified.
Option b Include a policy that sets out broad principles required for amenity space for housing but no size requirement.	This approach would be less prescriptive but encourage good design by setting out broad principles.	Potential for poor design and quality and not a large enough quantity of outdoor amenity space to serve needs.
Option c Set a requirement for outdoor amenity space for larger non-residential developments.	This approach ensures biggest non – residential schemes have well designed outdoor amenity for users of the development and, if well landscaped, this enhances the attractiveness of the design and potential for benefits of green spaces such as biodiversity and enhancing wellbeing.	Private amenity space at workplaces should not be needed if there is adequate public open space in an area and in living places. This would not represent the most efficient use of land. Management plans would be needed to ensure it does not become neglected.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various (A, B, A+C, B+C) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities,** as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion**.** Depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible

services/facilities, resilience to climate change etc). **Criterion 3. efficient use of land**, may be relevant as there may be implications for design of buildings and site layout. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

Policy Options Set 010e (Draft Policy HD14): Accessible and Adaptable Homes

7.10 Housing provision across the city needs to ensure that it meets the needs of everyone whatever age and stage of life. Homes need to be built with the flexibility to be adapted to the changing needs of residents. These changes include adaptations in the size and compositions of households, helping successful intergenerational living, with adult children and older parents moving back into the family home and an ageing population. Providing opportunities for residents to maintain their independence is very important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs.

Table 7.5 - Policy options set 010e: Accessible and Adaptable Homes

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek to ensure that a % of affordable homes and market homes (dependent on needs, viability and practicality but currently 100% affordable and 15% market) are constructed to accessible and adaptable homes standards set out in Part M4(2) and M4(3) of the Building Regulations. For M4(3) for Social Rent these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation.	This approach future proofs the housing stock.	The standards can be too onerous and impact upon site viability.
Option b Introduce specific exceptions to the requirement for accessible and adaptable homes for practical reasons, for example provision of lifts is disproportionately	Rather than lowering the percentage generally to ensure accessible/adaptable homes are achievable in all situations, this allows a generally high percentage, whilst avoiding situations	This may encourage low-rise flats, or one bed houses, to circumvent the policy, which may often not be the most efficient use of land or the most suitable design for the area.

expensive for flats of less than three or four storeys or for a small number of flats (fewer than 10) sharing one lift core, so upper floors would not need to conform.	where there are practical reasons that limit the amount of accessible and adaptable homes that can be provided.	
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	Rely on the NPPF to deliver the policy framework for delivering accessible and adaptable homes.	This could result in homes being built that are not sufficiently adaptable to the changing requirement of residents which is not an effective approach to meeting residents both current and future needs. Retrofitting houses to meet needs in the future is more costly and an inefficient use of resources.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B, A+B, C) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. accessible services/facilities). Option a and b are likely to have a minor positive impact on inequalites as there is an explicitly requirement for development to integrate accessibility and adaptability in their designs. Option c is likely to be neutral, as compulsory national policy requirements are likely to apply in most circumstances - particularly building regulations. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

8. Conclusions including key sustainability issues

8.1 The picture of health and wellbeing in the city is a varied one. There are a number of positives and improvements that have been recorded in recent years, such as high levels of physical activity and lower than average levels of obesity amongst residents, as well as numbers reporting general good health. There are also areas of concern, however, with mental health problem referrals on the rise, high levels of loneliness, and obesity amongst

children. There are also significant health inequalities within the city, demonstrated by the large differences in life expectancy between wards in different parts of the city.

8.2 Planning can have a significant influence on the quality of the built environment and therefore a variety of the wider determinants of health and wellbeing. Various interventions, from ensuring ample open space and areas for social interaction, to provision of sports and leisure uses and green infrastructure, can all have beneficial impacts that can address the issues highlighted in this paper. It will therefore be important for the theme of health and wellbeing to be threaded throughout the new Local Plan and for officers to consider opportunities to maximise positive impacts and minimise negative impacts on health, and reduce the health inequalities in the city, as they develop its various policies.

8.3 **Economic:** Improving the city's level of health and wellbeing, along with reducing the inequalities that exist, can have profound positive economic impacts. Fewer cases of ill health places far less strain on health services, meaning that Government funds can be redirected elsewhere.

8.4 **Social:** Increased healthy life expectancies are good for society, as people have more time to enjoy living their lives together. Furthermore, improved levels of health mean that people's life satisfaction will rise, boosting levels of mental wellbeing. Finally, a more healthy and active society encourages people to get out and about more, increasing social cohesion between communities.

8.5 **Environmental:** Reduced spending on healthcare services as a result of improved levels of health and wellbeing could lead to increased investment in green infrastructure. More people interacting with nature may also increase the community's level of engagement in conserving and enhancing the city's green spaces.

Key sustainability issues for the Local Plan to address:

- Oxford has high levels of health inequalities across the city. Planning may be able to support targeted interventions that could assist with this.
- Oxford's higher than average levels of activity and lower than average levels of obesity need to be maintained and improved.
- The Local Plan can help to improve mental health and wellbeing through, for instance, improving quality of housing, improving access to open spaces, and focusing on building communities, particularly learning from the coronavirus pandemic.
- Climate change represents a significant risk to health and wellbeing, particularly amongst certain communities. Climate resilience measures will be essential for helping to mitigate this risk.

6.1. Preferred approaches for the Local Plan 2042

8.6 Section 5 identifies a number of topics that the Local Plan 2042 could implement policy to address which relate to the provision of --. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Health Impact Assessments – draft Policy HD10:

8.7 The preferred approach for the Local Plan 2042 draft policy is to take forward **option A**. This option is a continuation of the approach followed by the currently adopted 2036 Local Plan, whereby it is a policy requirement for applicants for qualifying development schemes (currently major development) to submit an HIA. This approach is considered to be the most appropriate for assessing schemes that are the most likely to have an impact on the health and wellbeing of the contexts in which they are set in.

Privacy, Daylight and Sunlight – Draft Policy HD11

8.8 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of **options A and B**. This approach will ensure that policy requirements include minimum standards that can be expected for the amenity of occupiers of development (with respect to privacy, access to daylight and sunlight), in terms that can be measured and monitored, and it also allows policy to specify the types of development for which these standards will apply – including the option of having requirements that apply to non-residential development. This will broadly follow the policy approach as followed by the currently adopted 2036 plan.

Internal Space Standards for Residential Buildings – draft Policy HD12

8.9 The preferred approach for the Local Plan 2042 draft policy is to take forward is **option A.** Government policy does not allow much flexibility for authorities to set bespoke standards, and as such the approaches available to plans are for national space standards to be followed, or no standards to be specified. A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Outdoor Amenity Space – draft Policy HD13

8.10 The preferred approach for the Local Plan 2042 draft policy is to take forward is **option A.** A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Accessible and Adaptable Homes – draft Policy HD14

8.11 The preferred approach for the Local Plan 2042 draft policy is to take forward is a combination of **options A and B.** This approach would ensure that a sufficient amount new additions to the city's housing stock is future proofed in line with the projected demographic trends for the aged population and the current needs of residents with mobility issues. Option B in particular will allow the policy to be sufficiently flexible for situations where accessible/adaptable homes are difficult to achieve for practical reasons while ensuring a sufficient amount is still delivered.

Background paper 011

Title: Urban Design, Placemaking, Heritage and Archaeology

This paper addresses: Principles of high-quality design, the historic environment of Oxford including designated heritage assets.
Relevant Local Plan Objectives: • Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage.
SA Objective(s): 10. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation
SEA theme(s): Material assets, cultural heritage, landscape and archaeology.

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

Other relevant plans/programmes/strategies 6

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 7

Context of the city 7

Historical context and heritage assets in the city 8

Encouraging high-quality urban design 10

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 11

Design and Wellbeing ..... **Error! Bookmark not defined.**

The climate emergency ..... **Error! Bookmark not defined.**

5. Options for Local Plan 2042 policies 12

Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets 14

Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets 16

Policy options set 011c (draft policy HD6): Archaeology 17

Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings 20

Policy options set 011e (draft policy HD8): Making efficient use of land 23

Policy options set 011f (draft policy HD9): Views and Building Heights 25

Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features 27

Policy options set 011h: Specific design guidance for areas..... **Error! Bookmark not defined.**

Policy options set 011i: Public Art ..... **Error! Bookmark not defined.**

6. Conclusions including preferred approaches for Local Plan 2042..... 30

6.1. Preferred approaches for the Local Plan 2042..... 30

1. Introduction

1.1 The importance of high quality design in creating places where people feel safe and rooted and want to be is well recognised. Good design can create or enhance unique character, but is also about functionality, helping to make a place that is attractive for walking and cycling, that feels safer from crime and vehicle traffic and can help stimulate social interaction. Good design means resources are used more efficiently and maintenance costs are reduced. Good design is also linked to health and wellbeing, making space for nature, as well as building resilience to climate change.

1.2 Understanding of existing character, whether that is from natural or built features, is the starting point of creating good design. Strongly linked to that is identifying and understanding heritage assets. Heritage assets are strongly protected in national policy. In recent years there has been a subtle change in national policies that require the significance of heritage assets to be weighed up against the potential benefits of new development. There is also an increased understanding of the wide range of things that contribute to the importance of heritage assets, which includes the significance placed on them by local people.

1.3 The Council has a duty to protect and enhance historic environment through the Local Plan, this is important for delivering sustainable future for city. The historic environment is important for supporting wellbeing and economic growth too, particularly in Oxford, where it acts as a significant draw for tourists globally every year and helps to contribute to the special character of the city. Protections for the historic environment are not about ensuring no development happens to them full stop, instead the focus is on managing change so it happens in right way so we preserve historic environment for benefit of future generations.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance (PPG)

2.1 The NPPF (2024) places significant weight on good design as a means of bring about sustainable development, creating "better places", and bringing about development that is suitable and appropriate for the communities where it takes place. Paragraph 135 sets out how planning policy and decisions should ensure that development:

a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

2.2 There is the expectation that design policies are developed alongside local communities in order to reflect the aspirations and defining characteristics of the local area (paragraph 132). The NPPF further requires that the greatest possible amount of clarity on what is expected with respect to design outcomes and requirements is facilitated as early as possible in the development process (para 126). It promotes the use of tools such as design guides and codes within instruments like local plans and supplementary planning documents to create a framework setting design standards and requirements, with the level of detail or prescription tailored to the specific setting.

2.3 Continued engagement during the development of emerging individual schemes is also encouraged, with the onus placed on local authorities and to some extent applicants/developers to ensure early local involvement in the evolution of schemes (paragraph 132). Local authorities are expected to be proactive in using methods such as design reviews, workshops and assessment frameworks such as Building for a Healthy Life to ensure design quality (paragraph 138).

2.4 Paragraphs 202 to 221 of the NPPF contain policies specific to the historic built environment and heritage assets. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance.

2.5 Heritage significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence, but also from its setting.

2.6 'Great weight' is to be given to conservation and clear and convincing justification is required for all grades of harm, including through change to the setting, Justification must be on the grounds of public benefits that outweigh that harm (paragraphs 208 and 209). Public benefits will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations. In order to make a sound decision, a planning authority needs to understand from the applicant the significance of any heritage asset affected (paragraph 211). This may require some investigative work, but the information to be supplied with the application should be proportionate to the asset's importance and the potential impact.

National Design Guide

2.7 The National Design Guide (updated January 2021) is a material consideration and forms part of national planning guidance setting out the characteristics of well-designed places and demonstrating what the government considers good design to mean in practice. The guide outlines and illustrates ten characteristics of good design falling under the topics of Climate, Character and Community. The characteristics range from context, identity and built form, through to nature, public space, movement, and the uses on the site including homes and buildings, the resources used to construct them and their life span. Each is discussed in detail in the guide but are illustrated in the circular diagram in Figure 2.1.

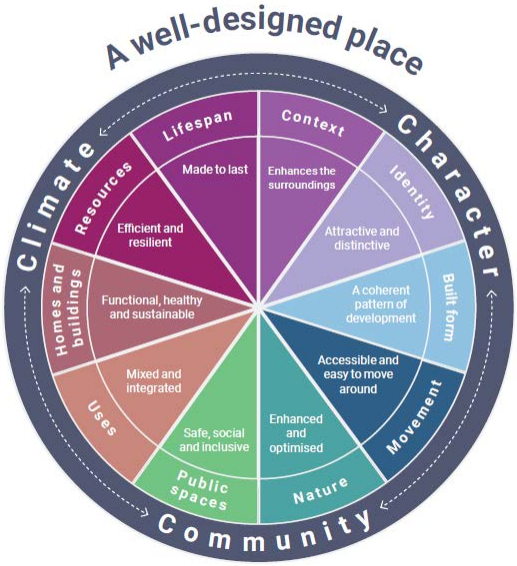

Figure 2.1 - Ten characteristics of good design (DCLG National Design Guide 2021

Listed Building Act

2.8 The Planning (Listed Buildings and Conservation Areas) Act 1990 provided listed buildings and conservation areas with additional protections relating to the granting of planning permission. It created special controls for the demolition, alteration or extension of buildings, objects or structures of potential architectural or historic interest.

Oxford Local Plan 2036

2.9 Existing policies from the Oxford Local Plan 2036 are working to protect the historic environment in Oxford. The design and conservation policies can be found in Chapter 6 'Enhancing Oxford's heritage and creating high quality new development'. The plan promotes high quality design and placemaking through Policy DH1:

Policy DH1: High quality design and placemaking

Planning permission will only be granted for development of high quality design that creates or enhances local distinctiveness.

All developments other than changes of use without external alterations and householder applications will be expected to be supported by a constraints and opportunities plan and supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement or a Planning Statement), which should cover the relevant checklist points set out in Appendix 6.1.

Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 6.1.

2.10 In order to protect Oxford's unique historic environment described above, further policies

in Chapter 6 include:

- Policy DH2: Views and building heights
- Policy DH3: Designated heritage assets
- Policy DH4: Archaeological remains
- Policy DH5: Local Heritage Assets
- Policy DH6: Shopfronts and signage
- Policy DH7: External servicing features and stores

Other relevant plans/programmes/strategies

Conservation Area Appraisals

2.11 Appraisals have been written for a number of our conservation areas, some of which are currently being updated. These documents detail the locations and characteristics which contribute to each area's architectural or historic importance, as well as opportunities for enhancement. They are available to view on the conservation webpages under conservation areas.

Assessment of the Oxford View Cones (Oxford City Council)

2.12 View cones are drawn as triangles from important viewing points to encompass the width of the area containing buildings that constitute Oxford's historic skyline. A View Cones Assessment has been prepared to examine the significance of views, identifying their special qualities. The View Cones Assessment sets out a methodology for heritage assessment of the Oxford views and applies this to each of the view cones. It describes and analyses the important features of the view cones. The study enables a greater understanding of the significance of all parts of the view cones, i.e. not just the skyline. It is designed to aid understanding of the impact of proposals on views.

2.13 The 10 identified view cones do not represent an exhaustive list of viewing points that provide an important view of Oxford's skyline. There may be glimpses of the famous skyline in other locations, and tall buildings in particular that are proposed outside of the view cones might still have an impact on the historic skyline.

High Buildings Study (LDA, 2018)

2.14 The High Buildings Study is in two parts-the Evidence Base Report and the Technical Advice Note. The Evidence Base Report (EBR) summarises the current 'baseline' of Oxford and has utilised mapping and 3D city wide modelling. The 'baseline' analysis looks at townscape character areas, how the city is structured such as through identifying the location of the city centre, district centres, and the main transport routes, as well as the current nature of building heights across the city. The EBR looks at the geographical distribution of heritage assets within the city and the ways in which setting

contributes to the heritage significance of these assets and their potential to be affected by high buildings. The EBR also considered where future growth in the city is planned or may be anticipated. The EBR concludes by identifying 'Areas of Greater Potential' for high buildings. These are areas that are relatively unconstrained by heritage considerations and also represent opportunities for high buildings such as at district centres and transport nodes. The Technical Advice Note (TAN) is a guidance document that supports policy within the Local Plan 2036 and aims to shape the growth of Oxford positively.

Cowley Branchline Densification Study (LDA, 2025)

2.15 The intention of this study is to give guidance to guide the opportunities for growth and regeneration within this Area of Focus. This includes opportunities that may arise from the planned investment in the Cowley Branch Line and associated walking, cycling and public transport connection to the stations from existing and future residential and commercial neighbourhoods. The study aims to guide development so that it extends the compact and mixed-use development of Oxford's core and district hubs to within the area of change, limiting sprawl and inefficient use of land, and maximising connectivity and availability of facilities and services.

A Character Assessment of Oxford in its Landscape Setting (LUC, 2002) and update Addendum Report (LUC, 2022)

2.16 The report was commissioned in recognition of the importance of the city's landscape and townscape and the changes it faces. The assessment looks at the component parts of the city, including its villages and neighbourhoods, and their individual characteristics which make up the city as a whole. It considers the historic, cultural and architectural associations, open places, wildlife and natural habitats and perceptual characteristics that combine to create Oxford's sense of place. The study helps in understanding which open spaces in the city are important in landscape terms, which areas of the city are sensitive to change and merit protection and opportunities for enhancement.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Context of the city

3.1 Key to Oxford's character is the fact that it is located in a floodplain overlooked by surrounding ridges, which create a backdrop to the 'dreaming spires'. These ridges provide an important backdrop to Oxford's cityscape. Oxford's setting is defined by 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. The river corridors running either side of Oxford's historic core are also an essential part of its special character and landscape setting.

3.2 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. As set out in the Oxford Local Plan 2036: *"It is important that design choices about building heights are informed by an understanding of the site context and the impacts on the significance of the setting of Oxford's historic skyline, including views in to it, and views within it and out of it. Taller buildings will be possible in many locations, but they must be designed to ensure they contribute to the existing character, and do not detract from the amenity of their surroundings."*

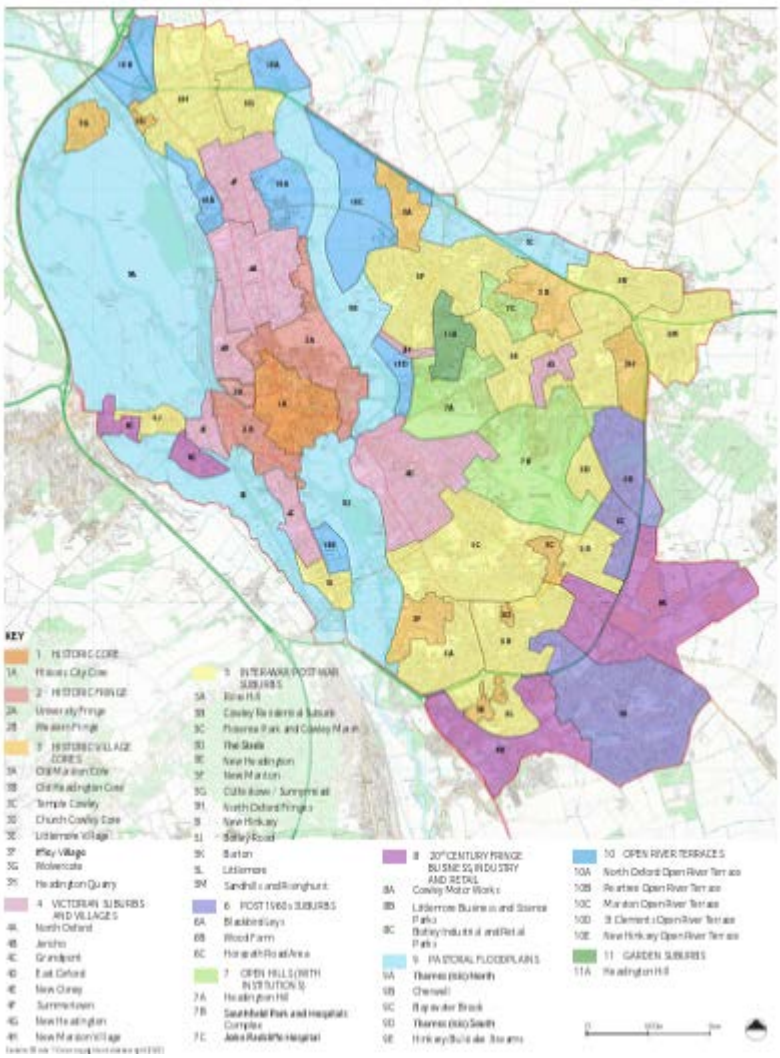

Figure 3.1 - Landscape character areas of Oxford as identified in the Character Assessment of Oxford in its landscape setting and updated using research for the Heritage Assets Register Project

Historical context and heritage assets in the city

3.3 Oxford contains buildings spanning every major period of British architectural history

from the 11th century onwards Oxford's extensive history of settlement and cultural significance has contributed to a wide array of statutory designations across the city which are of national importance for ongoing protection for the benefit of future generations. The city hosts 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. Statutory listing protects both the inside and outside of a building, as well as fixtures and fittings (like windows, doors or staircases) and subsidiary buildings that form the 'curtilage' of the building. Alterations can only be made to a listed building if the Local Planning Authority (LPA) grants Listed Building Consent for any changes that might affect the special architectural or historic interest of the building.

3.4 There are 18 Conservation Areas designated across the city at present3. Conservation area designation is afforded to areas to identify that they have special architectural or historic interest that makes them worth protecting and improving. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. Oxford's Conservation Areas are as follows:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

3.5 In addition to Listed Buildings and Conservation Areas, there are other important national heritage designations in the city including 10 scheduled monuments and 15 Historic Parks and Gardens which form an important component of the wider green infrastructure network.

3.6 Aside from national designations summarised above, there are a number of locally designated assets which have been identified on the Oxford Heritage Asset Register. This is a register of buildings, structures, features or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest. Locally listing does not establish the same level of protection as national listing in of itself.

3.7 Beyond these formally registered local assets, the city then also hosts a large number of traditional buildings (e.g. those built prior to modern methods of construction that arose in the 20th century) which also contribute to the wider character of Oxford. These other buildings may still benefit from special qualities or features that are characteristic of older construction/architectural styles which warrant protection where possible, and may also require more careful approaches to redevelopment that reflect the unique ways these buildings function (e.g. passive ventilation) compared with modern buildings built today.

3.8 Three of Oxford's heritage assets are currently on Historic England's Heritage at Risk Register, which identifies sites most at risk as a result of neglect, decay or inappropriate development. These are the Church of St Thomas the Martyr, St Thomas Street (condition poor, priority category D - slow decay; no solution agreed), Minchery Farmhouse (condition poor from slow decay, no solution, priority C), and Church of The Holy Family, Blackbird Leys (condition very bad, priority A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed).

3.9 The features below ground also make an important contribution to Oxford's rich heritage and the city has a rich archaeological abundance comprised of features that were deposited at various points in the past from prehistoric times to the modern day. The unique archaeological heritage of the city encompasses a wide variety of asset types. Notable assets include prehistoric domestic, ritual and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city. The town is also distinctive for its middle-late Saxon urban remains, its emergence as a major cloth trading town in the Norman period and for the numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges. Other assets of particular note include the town defences, the distinctive remains associated with the medieval Jewish Community and the Royalist Civil War defences.

Encouraging high-quality urban design

3.10 Oxford continues to develop exciting new buildings at the forefront of modern architectural design. 4 of the 13 2021 RIBA south award winners were new buildings in Oxford, 6 of 13 in 2022, 3 of 11 in 2023 and 2 of 6 in 2024. Many of these award winners are within the historic core of Oxford and respond sensitively to that context, whilst successfully achieving modern and functional design that meets its brief.

3.11 Oxford City Council have been running the Oxford Design Review Panel (ODRP) for over 10 years. It is run in house by the Urban Design team with a highly experienced panel of 40 members. Design Review is an independent and impartial evaluation process conducted by a panel of built environment experts and was set up to ensure that there is a consistently high standard of design for significant built environment projects. It aims to embed best practice in urban design into the planning process. The panel promotes high quality design to help create better buildings, streets and public spaces in the city and all major development proposals are encouraged to engage with ODRP before a planning application is submitted.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 There is an on-going development pressure on historic assets and this is likely to remain the same over the coming years. However, a strong suite of historic environment policies remains in place within the Oxford Local Plan 2016-2036. There are areas where fairly significant amounts of development area expected, and these have 'Area of Change' policies within the Oxford Local Plan 2036, intended to help manage change within these areas.

4.2 The factors that enable the development of successful new buildings that are modern yet integrated are varied, and many will remain. The existing Local Plan policies such as DH1 ensure the design of proposals responds to its context from the start of the process and that sufficient information is submitted to allow a thorough understanding of the design implications. After 2036, Policy DH1 will no longer be a current policy and the NPPF will be the framework under which planning applications are determined. Although the proposed changes to the NPPF appear to reflect a move towards greater emphasis on 'beautiful' design, this would still lack the detail and specificity which is reflected in local level policies, particularly in a city like Oxford.

4.3 In addition to well-designed buildings, it is attention to walkability, landscaping, layout and availability of services that are vital to a positive experience of a place, wellbeing and health. The Oxford Local Plan 2036 identified areas of change. Without a new plan these areas of change may not provide guidance for the right areas.

4.4 Local level policies are able to focus on a level of detail which applies to the specific setting of the local area, for example Policy DH2 of the Oxford Local Plan 2036: Views and building heights, relates specifically to Oxford's view cones and it iconic skyline. In the absence of this local specificity in planning policies, there would be greater risk that the level of detail which the city needs in order to protect Oxford's uniqueness would be lost.

4.5 One of the legacies of the COVID-19 pandemic and the response to it has been a change in the way that people use the public realm, arguably engendering a greater appreciation of what is, and is not, on one's doorstep. There are clear links between urban design and health and wellbeing, and it is more important than ever that places are designed with an awareness of the impacts on these. In times of social distancing, design can also help reduce perceptions of risk. Designs that allow for safe social interactions and that help to instill a sense of community are very important. This means places designed to give space for people to interact safely and to feel comfortable in, with access to nature and opportunities for outdoor recreation and with an emphasis on designing spaces for people, not cars.

4.6 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford. Design should respond to the challenges of climate change. Buildings will need to help adaptation to climate change, for example by being well insulated and naturally ventilated to deal with potentially hot summers, reducing the risks and damages of flooding events, ensuring biodiversity is maintained, ensuring there are green spaces to absorb rainwater and reduce flood risk, and to provide natural shade in the summer.

4.7 In terms of our contribution to climate change, the running of buildings is responsible for 81% of carbon emissions of Oxford, 29% of the total being from the running of residential dwellings[2]. In Oxford there is a careful balance that needs to be struck between preserving heritage value and retro-fitting buildings to reduce their carbon contributions. However, we take as a starting point that historic buildings are inherently sustainable. The inherent embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) of historic buildings means that their retention and care is consistent with modern concepts of sustainability and with the ambitions of reducing carbon emissions. The 'whole building approach' seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

5. Options for Local Plan 2042 policies

5.1 A number of potential topics for policies derive from the analysis set out in the previous sections. These will be important for delivering upon the various Local Plan 2042 objectives that seek to ensure that development at all scales in the city is of the highest design quality, and that Oxford's visual character and streetscene, and its unique skyline and views in and out of the city are preserved and enhanced.

5.2 The Local Plan 2042 therefore includes proposed policies to address aspects both protection and enhancement of different elements of the historic environment as well as a number of policy areas seeking to guide applicants towards high-quality design.

5.3 For each potential policy, options for the specific approach that could be taken for the Local Plan 2042 have been considered, and these ‘options sets’ are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). A summary of this screening process is included at the end of each options set table.

Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets

5.5 A cornerstone of good design is about ensuring proposals are informed by an understanding of existing context and designed to respond to this positively. In Oxford, a key part of this context is defined by the presence of heritage assets, and many of these have been designated for their national and local importance. There are a variety of designated assets in the city, from conservation areas and historic parks/gardens, to listed buildings and scheduled monuments, and their protection is not only about the features of the assets themselves, but often also about their wider setting.

Table 5.1 - Policy options set 011a: Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a set of policies relating to designated assets that reflects the NPPF (including Conservation Areas, Listed Buildings, Registered Parks and Gardens, and Scheduled Monuments), that set out how impacts on designated heritage assets will be assessed, when mitigation is required, and how harm should be balanced against benefits, including Oxford-specific detail in relation to what harm and benefits may be for different types of assets in Oxford/in different parts of Oxford.	This could set out Oxford-specific considerations, giving local detail to the direction of the NPPF and helping to ensure local context is considered in proposals and decision making. It gives more clarity for applicants.	A list of potential harms and benefits in Oxford could never be definitive and will not precisely fit all situations. It is important it does not take over from case-by-case consideration based on specifics of the case.
Option b Include a policy or set of policies for designated heritage assets (e.g. listed buildings, conservation areas) that reflects the NPPF but does not include	Ensures that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist.	Policy wording covers a lot so is long and can be unwieldy to read through and understand. This approach relies on overarching principles that may not address specific design issues. The policy would not have to include all

Oxford-specific detail in relation to harm and benefits.		designated assets, for example there is not scope for a policy that does much more than repeat national guidance in relation to scheduled monuments and important parks and gardens. Generally, this approach of largely repeating national guidance is unnecessary.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on delivering well-designed places, which it is not necessary to repeat.	It might be difficult to ensure proposals reflect Oxford context,risk of non – compliance with NPPF by not having more specific policies.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or b or c **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting designated heritage assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and b prioritise the protection of Oxford's designated heritage assets, ensuring the assessment, prevention or where necessary mitigation of harm. Option c would provide no local steer on the protection of designated heritage assets, but rely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option c would have a more neutral impact as it would rely on national policy. There is no direct national policy,

but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets

5.6 There are several historic buildings and other assets which do not meet the requirements for protection of a national designation, but which are of importance to the city for their locally significant heritage values. Oxford City Council maintains a list of local heritage assets known as the Oxford Heritage Asset register (OHAr). The OHAr provides the opportunity to identify those elements of Oxford's historic environment particularly valued by local communities. Locally important heritage assets can be added to the list when they are identified, if they meet the criteria. The current policy ensures that heritage assets of local importance will be a material consideration when determining planning applications. Buildings and structures on OHAr are not given any statutory protection from demolition.

Table 5.2 - Policy options set 011b: Non-Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for assessing whether an asset has locally important heritage interest, and how to identify non-designated heritage assets.	This is very helpful in adding clarity and highlighting the importance of local assets and ensuring something of their significance is reflected in new proposals.	There is a risk the list could be seen as definitive, and it is then considered that anything not on the list has no heritage value.
Option b No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on local heritage assets, so it is not necessary to repeat it and that would aid conciseness of the Plan.	It might be difficult to ensure proposals reflect Oxford context, or to argue that something is a heritage asset if it is not clear that they are considered important in Oxford and what the criteria for defining them is.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A or B **High-level screening conclusion?** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about how to protect local heritage assets in a manner appropriate to their significance. Option a would add clarity and highlight the importance and significance of such assets within a local context, whereas option b would rely solely on national policy and guidance. Option a would score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the option would also require new design to mitigate against any potential harm, and respond to local context. Option b would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 011c (draft policy HD6): Archaeology

5.7 Just as with its built environment, Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. New development presents opportunities to unearth and discover new archaeological remains which need to be fully realised, equally, it has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated.

5.8 The policy options are intended to address the presence of archaeology, our preferred approach is to continue to define the City Centre Archaeological Area and require a holistic management plan for the colleges which are areas of known archaeological significance whilst also flagging those important features could be found elsewhere in the city. Where features could be present, we would require appropriate assessments and information gathering that can define character, significance and extent of any deposits so that these are not missed or lost. We would also positively support proposals which are designed to enhance or to better reveal the significance of the asset.

Table 5.3 - Policy options set 011c: Archaeology

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the City Centre Archaeological Area. For all sites where archaeological deposits or features are suspected, require the incorporation of sufficient information to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant.	There are known to be archaeological deposits of significance across the whole city centre area, so defining this area to flag this up front and ensure assessments are carried out from the start of the process would help to bring certainty. This sets out from the start exactly what is expected which aids certainty for developers.	By defining an area there is a danger that areas outside of this will not be considered from the outset for their potential archaeological importance. To mitigate this a policy would also need to ensure it was made clear that there is potential for archaeological deposits across the city. This adds length and detail to the policy.
Option b Require a holistic management plan for key historic college owned and occupied sites in the City Centre Archaeological Area when development is proposed. These should take a holistic view of the whole college site and should consider features that should guide the location of new development within the site, including best location for basements in terms of impacts on archaeology (and cumulative impacts).	Colleges sites are almost certain to have archaeologic interest, as well as being long-term owners with extended interest in their significant sites, which they are custodians of. Where developing in an area with such significant archaeology it is important that development is considered holistically and located in the best way within a site.	This does require up front work from the colleges.
Option c Where proposed development would impact on archaeological or	This follows the NPPF approach so adds clarity that this would be expected. If the other parts of the	This adds length and detail to the policy which may not be necessary as

paleoenvironmental features and deposits, it will only be supported where the harm to such deposits and features can be eliminated or where, by agreement, mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).	NPPF approach are to be in a policy tailored to Oxford then it would be confusing not to include this also.	it is at least partly covered in the NPPF.
Option d Map more areas as archaeological areas where it is known there are likely to be deposits/not allocate sites where archaeological deposits or features are expected to be present and require heritage assessments with potential desk-based assessments if needed.	There are other known areas of deposits, although none to the extent of the city centre. We could define these on the policies map to help flag the high likelihood of deposits in these areas, which would ensure they weren't overlooked and would add certainty for developers from the start of the process.	This risks suggesting that areas that aren't mapped are unlikely to have deposits. It might be safest to rely on initial investigations for individual sites as they come forward, which can be done in advance for allocated sites.
Option e Do not include a policy about archaeology but rely on national policy instead.	This avoids any repetition with national policy and keeps the plan focused on things that are not already covered in national policy.	Given the importance of the heritage of Oxford and its rich archaeological record it should be highlighted in the local plan. Having no specific policy would miss the opportunity to highlight this importance from the start or to tailor the policy approach to Oxford.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? A, b, c, d, or e, or a combination of a, b, and c

High-level screening conclusion? the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** These options are about protecting archaeological and paleoenvironmental assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and c would have a positive impact, options b and d do not directly apply restrictions and therefore are more likely to be neutral on their own. Option e does not provide local context, but relies solely on national policy and guidance. The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option e would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings

5.9 High quality design needs to show a good response to its surroundings as well as considering how buildings and spaces interact and function. From the materials selected to build a structure, to the provision of green open space, layout of pedestrian routes and provision of shops/amenities, design of places needs to take account of and balance many considerations in order to be successful.

Table 5.4 - Policy options set 011d: Principles of high-quality design of buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires high quality design and include a checklist	Would help ensure that new development schemes are built to the	Types of development that checklist may apply to are limited e.g.

to set out key principles of what this means in detail (including principles for materials, layout, potentially secure by design, etc.), requiring that the Design and Access statement or other submission alongside the planning application covers the relevant aspects of good design. Exempt householder applications and changes of use without external alteration from needing to include answers to the relevant checklist questions in their submission.	highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist. Sets standards for high quality design for relevant schemes, reflects importance placed on creating distinct places in planning framework.	householders and change of use not covered. Householder applications should still aspire to high design quality. Checklist can be generic, with overarching principles that may not address design quality issues affecting specific development types e.g. residential dwellings, hotels etc. The alternative is to expand the scope of checklists including becoming more prescriptive. Assessment of schemes may rely on some level of subjective judgement which might be point of contention with applicants and lead to drawn out negotiation and argument. May be onerous to apply and may require extensive officer time.
Option b Include householder applications and/or changes of use applications in the requirement to follow the checklist.	Even if there are no significant external changes of use, they may have an impact on the character of an area. Householder extensions also have an impact. Smaller applications are not necessarily simple and the cumulative impact of poor-quality design and a low expectation for householder applications can have a significant impact on the overall quality, character and particularly appearance of a place.	The impacts on design can be assessed without a checklist for these smaller applications. Many of the urban design principles will not be applicable to these or householder extensions. This approach could be quite onerous without necessarily adding significant value.

Option c include a generic design policy but be less specific e.g. have requirements for good quality design but do not rely on a checklist.	Potentially more flexibility for developers to bring forward compliant schemes and more quickly. Easy to compare requirements to NPPF and other authority baselines.	It might be difficult to ensure proposals reflect Oxford context.
Option d No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF update has more specific direction on delivering high quality design.	It might be difficult to ensure proposals reflect Oxford context, risk of non-compliance with NPPF by not having more specific policies.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b, c, or d **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** Options a, b, and c are all alternatives and generally cover how far a policy goes with setting design guidance/requirements (e.g. detailed checklist or more simple). Option C would be considered as an addition to either option a or b and would expand the types of applications it applies to. In terms of sustainability impacts... Most directly the options would impact **criterion 11. Urban Design**, but depending on the implementation of the options, they are likely to impact other criteria in the SA framework also (e.g. sustainable construction, greening, health and wellbeing etc). Option d and E are likely to have a neutral impact, but options A and B are likely to have a more positive impact because they are more prescriptive and specific about what would be considered good design in the city, potentially, option A might achieve a significant positive for this reason. Overall, the sustainability impacts between the options are similar to each other from a sustainability perspective, it is not considered necessary to scope in for detailed appraisal.

Policy options set 011e (draft policy HD8): Making efficient use of land

5.10 Land is a very scarce resource in Oxford. At the same time, there are considerable and varied needs, but in particular for housing. These needs therefore compete for limited land. In this context, it is absolutely essential that best use is made of land. However, at the same time, Oxford has an irreplaceable heritage, and is important design also responds to this context.

Table 5.5 - Policy options set 011e: Making efficient use of land

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require that proposals make the best use of site capacity, taking into account the surrounding area, building heights, massing and other contextual factors such as heritage and green infrastructure.	This approach would enable proposals to respond to site-specific circumstances and surroundings, and capacity will be guided by the appropriate use for the site.	If minimum density requirements are not set, there is a risk that sites may not make best use of site capacity. For example, they may not deliver as much housing as a site can offer and by extension what is needed to meet the city's housing need.
Option b Have minimum density requirements for proposals in district centres and the city centre only	This meets the NPPF requirement to set minimum density standards for city and town centres and other locations that are well served by public transport. By establishing minimum density requirements, we can help to ensure that sites make best use of site capacity and help to maximise the levels of housing that could be accommodated.	This does limit the scope for bespoke site-specific responses to surroundings Setting minimum standards also can have unintended consequences for the housing mix and other onsite design considerations such as level of open space provision.
Option c Have minimum density requirements to cover the whole city, with different targets for different areas such as	Same positives as option b, but this would go further in meeting the NPPF guidance by establishing minimum requirements across the whole city.	As with option b, this does limit the scope for bespoke site-specific responses to surroundings.

suburban, gateway, district and city centre areas.	It could give an even stronger starting point for ensuring efficient use of land and resisting applications that do not achieve it. This approach would make it very clear in terms of what's expected.	Local character and site context is difficult to reflect in broad minimum densities. This means densities may need to be set lower than is necessary in most cases, to avoid having too many applications that need to depart from this approach.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b, c, a+b, a+c **High-level screening conclusion?** the options are similar to each other from a sustainability perspective and unlikley to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** Option a would set out local policy requirements for the types of considerations that applicants should demonstrate they have addressed in determining an appropriate capacity for development on a site. Option b and c are alternative approaches to seeking to ensure development meets a minimum density standards, option b only setting minimum density requirements in the district and city centre(s), whilst option b would set minimums across the entire city (thought these would be tailored to different areas). Option a could standalone, or be incorporated alongside either option b or option c (which could also stand alone without pursuing option a). Sustainability impacts arising from the options are predominantly relevant to **SA criterion 3. Efficient use of land**, however the nature of the options could indirectly impact a variety of other criteria. The options are all likely to lead to minor positives for SA criterion 3. as they are specifically focussed on trying ot ensure efficiency through maximising the use of sites. Option b and c could lead to minor negative impacts for criteria that relate to other types of land uses such as local context and heritage assets (relevant to **11. Urban Design and Historic Environment**) and green infrastructure and open space (relevant to **7. Green Infrastructure**), in that the pursuit of a minimum density target without due consideration for other environmental context could lead to harm to other features in the environment. Option a would seek to ensure these wider considerations are factored into design rationale informing a site's capacity so would seek to mitigate the impacts under the other options, and as such would score neutral against the same criteria, although it very

much depends upon implementation. Overall, the sustainability impacts between the options do not differ significantly and they are not considered necessary to scope into a detailed appraisal.

Policy options set 011f (draft policy HD9): Views and Building Heights

5.11 Oxford has an iconic skyline, which includes the 'dreaming spires', as well as several special views into the historic core which are detailed in the Oxford View Cones assessment. These features mean that the city is particularly sensitive to the impacts of taller buildings, and care needs to be taken over the design and placement of such development where it is proposed so that taller buildings do not negatively impact on views of the iconic skyline.

Table 5.6 - Policy options set 011f: Views and Building Heights

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area. This area contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m in height will intrude into the skyline. Require that any buildings above this height are limited and bulk, only thin, delicate and of the highest design quality, demonstrated by stringent appraisals to inform and explain design choices.	This option gives a nuanced approach to assessing heights, which aims to avoid harmful uniform heights but also ensure positive impacts. It does not prevent unwanted intrusion into the skyline because there is a rigorous process to prevent it, but it also still allows fantastic additions to the skyline.	Uniform heights can still occur. An element of judgement is introduced without a set height limit (even though a rigorous policy and process should prevent harm).
Option b Continue to refer to the High Buildings Technical Advice Note (TAN) (or an	The High Buildings TAN contains useful guidance specific to Oxford that helps positively shape design choices	The guidance can't itself prevent designs that are harmful to character and not justified and this would need

updated version) as the key evidence base for deciding appropriate heights, designing higher buildings and appraising applications.	in relation to building heights. The guidance is already in place and has been used successfully to inform many applications and decisions.	to be in conjunction with other policy requirements. It will be necessary to make it clear that local townscape considerations still apply too.
Option c Continue to define view cones, which are the areas within a view from historic viewing places from where the 'dreaming spires' can be most clearly seen. Include a policy that requires design within the view cones to avoid harming the views of the spires.	This approach has been successful over a long period of time. Although views of the spires may have altered over time because of growth of vegetation, there are not buildings in the view cones that prevent the viewing, enjoyment and understanding of the spires. These are long established as the key viewing points, and the protection, especially in combination with policies relating to the central area, has conserved the important views over time.	The approach is limited to views from defined viewing points.
Option d Include an absolute height limit in the city centre that does not interfere with the spires.	This would protect the views of the historic spires as they are.	An absolute height limit can be set lower than it potentially needs to be in order to make sure everywhere is low enough not to interfere with the dreaming spires. Any innovation or change is stifled. This approach can lead to uniform heights, leaving unwanted horizontal line that harms the foreground of views and the setting of historic assets and prevent the spires and towers to be properly discerned, detracting from their significance.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations of options e.g. option a, a+b, a+b+c, b+c+d **High-level screening conclusion?** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal?** No **Rationale:** Of the options – option a does potentially allow higher buildings, meanwhile option d is a hard restriction in heights in the city centre. Option B is about making reference to the high buildings TAN to guide design considerations and option C is about incorporating view cones into a policy and including particular considerations in relation to applications within these zones. In terms of sustainability impacts – key criteria these options are relating to is criterion 11. Urban Design/Historic Environment. All the options would likely have a positive impact for this criterion (at least in terms of supporting the historic environment). The options also potentially have an impact on criterion 12. Economic Growth, because option a is not a hard restriction, it is likely to have a neutral impact on economic growth. Option D is likley to be a negative impact. Option C potentially also has a minor negative impact for criterion 3. Efficient use of land – limiting heights potentially limits development options/density? Overall, there are unlikely to be significant sustainability impacts from the options that would warrant testing through a detailed Sustainability Appraisal.

752

Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features

5.12 It is important to ensure that new development is designed with appropriate consideration for bin and bicycle storage and also external servicing features. The Local Plan 2042 seeks to increase the uptake of cycling further to help Oxford achieve its ambitions of improving air quality, reducing congestion and encouraging healthy lifestyles. The Local Plan also seeks to ensure that bins and external servicing features are considered at the initial stages of the design process so they can be designed in at an early stage rather than being considered as an afterthought which can result in negative impacts on the

appearance and amenity of an area. The policies in Chapter 6 of the Local Plan include guidance on bin, bicycle storage and external servicing features whilst the policies in Chapter 7 include bicycle parking design standards.

5.13 The policy options set out below include requirements for the design of these areas. There is also an alternative option of having no locally set policy on bin and bicycle storage and external servicing features.

Table 5.7 - Policy options set 011g: Bin and Bicycle Stores and External Servicing Features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Requires that bin and bicycle stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs but do not detract from the overall design, that external servicing features are integrated into the design or positioned to minimise their impact and that high quality materials are used. Include compulsory requirements, setting out binding design codes depending on location, building type etc, and requiring fire-safe spaces with adequate electric supply for charging.	Applying a discrete policy ensures considered design of these areas and not just as an afterthought; it helps alignment with other objectives of plan e.g. encouraging active, sustainable travel; effective waste management etc. This can bring in a far greater level of clarity in terms of design requirements, ensuring high design quality, public amenity etc. There is less chance for this area to be overlooked or for poorer quality to be introduced by stealth or negotiation. There are many consistent key principles that can be written into policy, to raise the awareness of the need for good design of these areas from the outset, and to be consistent with increasing e-bike ownership, etc.	Adding further burden to developers in bringing forward schemes; may be too onerous to apply or enforce.
Option b No specific policy, rely on NPPF.		

	NPPF update has specific direction on delivering high quality design.	It may be difficult to ensure proposals reflect Oxford context; difficult to ensure consistent standards and design quality if proposals are always assessed on case-by-case basis; difficult to require a minimum level of servicing without policy.

Initial sustainability appraisal of options sets
Is there only one option or are there various options we could take? - Option a or Option b **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a or Option b are alternatives to each other and represent the choice between having a specific local policy or not. In terms of sustainability impacts, the two options relate to **criterion 11. Good urban design, criterion 8. to reduce traffic and associated air pollution and criterion 1. car emissions.** Option a would have a minor positive impact for all criteria above. It would help with urban design, potentially reducing the risk of bin storage being unsightly and could help encourage the use of active travel modes. Option b would have a minor negative impact as whilst there is national policy on delivering high quality design, this is not specific to the Oxford context and could result in poor quality design of either bin storage and/or cycle storage areas. Poorly designed cycle storage could deter the use of bicycle which could exacerbate congestion or air quality issues if people chose to travel by car instead. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

6. Conclusions including preferred approaches for Local Plan 2042

6.1 A better understanding and appreciation of the archaeology of Oxford helps us to understand its heritage. Archaeological remains can't be renewed so it is essential they are managed carefully and treated with respect. It is important that Oxford's archaeological legacy is protected and where the loss of archaeological assets can be justified opportunities to investigate and record archaeological remains are fully realised when development takes place.

Key sustainability issues for the Local Plan to address:

6.2 Good Urban Design:

- Providing well designed bin and bicycle storage areas would reduce the risk of these areas being unsightly.
- A good understanding of heritage value will be required to ensure continued development pressure does not adversely affect heritage assets, important townscape features and local character.
- Potential impacts on areas of archaeological and historical value of new development proposed in the plan should be considered.
- Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. These need to be properly understood to inform decisions.
- Design should ensure that green spaces and features are woven into the urban fabric.

6.3 Reduce traffic and associated air pollution:

- Providing well designed bicycle storage would help encourage the use of active travel modes which may help reduce the number of car journeys being made which would help reduce air pollution.

6.4 Car emissions:

- Journeys may be made by active travel modes rather than by car.

6.1. Preferred approaches for the Local Plan 2042

6.5 Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address heritage and design. Under each of the topics, there were various options for policy approaches which could be taken, with differing impacts, and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Designated Heritage Assets – draft policy HD1, HD2, HD3, HD4

6.6 The preferred approach for the Local Plan 2042 policy is to have a local policy that elaborates on the NPPF, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

6.7 As such the preferred option is option A. A suite of draft policies in proposed, that explain how the NPPF approach should be applied to different types of designated heritage asset, and which includes more detail than the NPPF and will enable the supporting text to include Oxford-specific information. This will help ensure Oxford's designated heritage assets are understood and responded to appropriately in the planning process.

Non-designated Heritage Assets – draft policy HD5

6.8 The preferred approach for the Local Plan 2042 policy is to have a local policy that elaborates on the NPPF approach to non-designated heritage assets. The policy approach needs to align with the NPPF, but by including a policy there is the opportunity to reference the Oxford Heritage Asset Register and also to reiterate how non-designated heritage assets may be identified.

6.9 As such the preferred option is **option A**. A draft policy is proposed that sets out how non-designated heritage assets will be considered, which is accordance with the NPPF. In addition it sets out routes by which a non-designated heritage asset may be identified.

Archaeology – draft policy HD6

6.10 The preferred approach for the Local Plan 2042is to have a local policy that defines the city centre archaeological area and that also provides guidance for when archaeological deposits are impacted. The city centre area has such a wealth of deposits, that it is almost a certainty that development will impact on them. Therefore, it is worth being upfront and setting out the starting point that deposits are likely to be found. The sets out a clear expectation that there is efficient use of land in all schemes. The policy sets out criteria to be considered in determining a site's capacity, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

6.11 As such the preferred option is option A combined with Option C.

Principles of high-quality design of buildings – draft policy HD7

6.12 The preferred approach for the Local Plan 2042 is to have a local policy that requires high quality design and that links to a checklist that sets out what needs to be considered in order to demonstrate high quality design. This policy approach is not prescriptive, but does ensure a thorough consideration is given to all aspects of high quality design.

6.13 As such the preferred option is Option A. Option B is very similar, but would also require use of the checklist for householder and change of use (with no external alterations). This is not justified, because the approach would not be proportionate to the scale of those developments. Option C or D would not provide sufficient design guidance.

Making efficient use of land – draft policy HD8

6.14 The policy sets out criteria to be considered in determining a site's capacity, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.

6.15 As such the preferred option is option A. A suite of draft policies in proposed, that explain how the NPPF approach should be applied to different types of designated heritage asset, and which includes more detail than the NPPF and will enable the supporting text to include Oxford-specific information. This will help ensure Oxford's designated heritage assets are understood and responded to appropriately in the planning process.

View Cones and High Buildings - draft policy HD9

6.16 The preferred approach for the Local Plan 2042 policy is to have a local policy that sets guidance for what a high building is and sets criteria for guiding appropriate height and analysing impacts. The preferred approach is also to define an area within 1,200m radius of Carfax tower as needing very strong justification for any building over a set height. The preferred approach is also to continue to define view context. Taken together, these elements of the draft policy ensure that the important skyline is protected, but do also allow flexibility for well-designed schemes of height, with supporting guidance showing how to determine appropriate heights in different parts of the city.

6.17 As such, the preferred option is a combination of a, b and c. An absolute height limit is not considered appropriate as it does not offer flexibility and could have other significant negative impacts, such as uniform height being introduced.

Bin and Bicycle Stores and External Servicing Features – draft policy HD15

6.18 The preferred approach for the Local Plan 2042 policy is to have a local policy that requires bin and bicycle stores and external servicing features to be considered at the outset of the design process. This will help to ensure a higher quality design. It would also help to meet other Local Plan 2042 objectives including encouraging active travel and effective waste management.

6.19 As such the preferred option is option A. The draft policy includes a set of criteria that should be considered. Option B is to not have a bespoke policy but to rely on the NPPF. This may result in inconsistent standards of bin and bicycle storage provision, which may have negative implications including on the urban realm.

Background paper 012

Transport

This paper addresses: Oxford's circumstances around Transport and Movement
Relevant Local Plan Objective(s): A liveable city with strong communities and opportunities for all
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040 4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home. 6. To provide accessible essential **services and facilities**. 8. To reduce **traffic and associated air pollution** by improving travel choice, encouraging active travel, shortening journeys, and reducing the need to travel by car/lorry. 11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation. 12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.
SEA themes: Air, Climatic Factors, Material Assets, Population, Human Health, Cultural Heritage and Landscape

1. Introduction 2

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 3

Plans Policies and Programmes 3

National Planning Policy Framework (NPPF) 3

Regional Policy and Strategy 3

Local Transport and Connectivity Plan (LTCP) 4

Central Oxfordshire Travel Plan (COTP) 5

Oxfordshire Housing and Growth Deal 6

Department for Transport's Local Growth Fund and Homes England's Housing Infrastructure Fund (HIF) 6

Bus Service Improvement Plan (BSIP) 6

Oxfordshire Rail Corridor Study 6
Oxfordshire Connect 7
Electric Vehicle (EV) Charging Strategy 7
Oxford Local Plan 2036 8
Corporate Plan 8
Oxford Climate Emergency 9
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) . 9
Motor Vehicle Parking 17
Public Car Parking in City and District Centres 17
Residential Parking 17
Controlled Parking Zones (CPZs) – 17
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 18
5. Options for Local Plan 2042 Policies 18
Policy options set 012a (draft Policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans 20
Policy options set 012b (draft Policy C7): Bicycle Parking Design Standards 22
Policy options set 012c (draft Policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards 25
Policy options set 012d (draft Policy C8): Motor Vehicle Parking Design Standards . 27
Policy options set 012e (draft Policy C9): Electric Vehicle Charging 31
6. Conclusions including preferred approaches for Local Plan 2042 34
6.1. Preferred approaches for the Local Plan 2042 34

1. Introduction

1.1 This topic paper focuses on Oxford's transport system. It provides a context for considering this subject by providing a brief summary of the relevant national and local plans, policies and programmes that currently exist and will influence change in the future. There is a section on the current situation which includes some key information about existing and emerging strategies. As part of an assessment of the current situation some of the key challenges and future trends that are likely to impact on the transport system are identified. The next section explores what would happen without a Plan and the potential difficulties that the city would face in terms of transport and connectivity. The final

section puts forward some ideas for discussion to suggest what the emerging Local Plan 2042 could do to in terms of meeting the objectives of both existing and emerging policies and strategies.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

Plans Policies and Programmes

National Planning Policy Framework (NPPF)

2.1 The NPPF (December 2024) makes it clear (paragraph 109) that transport issues should be considered from the earliest stages of plan-making. This should involve identifying and pursuing opportunities to promote walking, cycling and public transport use. It states (paragraph 111) *"Planning policies should:.....be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils.....provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)."* In terms of parking, the framework makes it clear (paragraph 112-113) that policies should take into account the availability and opportunities for public transport.

Regional Policy and Strategy

2.2 England's Economic Heartland (EEH), the subnational transport body stretching from Swindon in the west to Cambridge in the east published its Transport Strategy: Connecting People, Transforming Journeys in February 2021. Although a non-statutory document, this strategy sets out a policy framework designed to deliver the EEH's ambition to support sustainable growth and improve quality of life and well-being through a world-class, decarbonised transport system which harnesses the region's global expertise in technology and innovation to unlock new opportunities for residents and businesses, in a way that benefits the UK as a whole. Informed by a programme of technical work, taken forward in collaboration with partners within the Heartland and Government, the strategy is guided by four key principles:

- Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040;
- Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel;
- Supporting the regional economy by connecting people and businesses to markets and opportunities; and
- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact.

2.3 The EEH have produced three connectivity studies (Oxford- Milton Keynes, Peterborough – Northampton – Oxford and Swindon – Didcot – Oxford) for areas in Oxfordshire that will help identify opportunities for partnership working to develop the case for regional funding and further scheme development. Transport mode based evidence studies and strategies have also now been produced. These include the Active Travel Strategy (Part 1 (March 2022) and Part 2 (July 2023)) which identifies cross boundary opportunities to improve active travel; the Regional Bus Strategy (July 2022) which identifies opportunities to improve cross boundary bus movements; the Mobility hubs business case guidance (March 2023) which provides practical guidance and advice in developing business cases and undertaking appraisal for mobility hub proposals; the Main Line Priorities Rail Study (October 2024) which identifies priorities for rail investment across the region; the Improving the North Cotswold Line strategic narrative (January 2025) and The case for reinstating Oxford-Swindon-Bath-Bristol rail services (January 2025) which both aim to improve services along their corridors, Hereford, Worcester and Oxford and Oxford- Swindon-Bath-Bristol respectively.

Local Transport and Connectivity Plan (LTCP)

2.4 The LTCP, adopted in July 2022 and updated in November 2024 is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents.

2.5 The headline targets in the LTCP include:

2.6 By 2030:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire;
- Reduce car vehicle miles driven in Oxfordshire by 10%;
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week; and
- Reduce road fatalities or serious injuries by 50%.

2.7 By 2040:

- Deliver a net-zero transport network; and
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire

2.8 By 2050:

- Have zero, or as close as possible, road fatalities or serious injuries; and
- Deliver a transport network that contributes to a climate positive future

2.9 These are to be achieved by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice.

2.10 The LTCP vision and policies will be used to influence and inform how we manage transport and the types of schemes implemented. The latest LTCP monitoring report covering 2023-2024 was published in November 2024.

2.11 The LTCP is supported by a number of strategies and plans which are relevant to Oxford. These include the Active Travel Strategy (July 2022) which focuses on active travel modes; the Mobility Hub Strategy (July 2023) which focuses on transport interchanges across the county to improve the way we travel and to better integrate different transport modes; the Freight and logistics strategy (July 2022) which addresses some of the challenges with the movement of goods in Oxfordshire; the Innovation Framework, (publication year TBC) which sets out guidance as to how to consider innovation within planning and development; the Digital Infrastructure Strategy (updated summer 2022) which sets out how to continue to improve both fixed and mobile digital connectivity in collaboration with partners, suppliers, and central government and the Central Oxfordshire Travel Plan (COTP) (August 2023) which sets out the transport plan for the central Oxfordshire area from 2023 to 2050, with a focus over the period to 2032.

Central Oxfordshire Travel Plan (COTP)

2.12 The COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors (Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley. The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets. For Oxford these include the following:

- an expanded zero emission zone (ZEZ) - an expansion of the pilot ZEZ launched in February 2022;
- strategic traffic filters - intended to reduce traffic levels in Oxford by managing the use of certain roads in the city by private cars; and
- a workplace parking levy - an annual charge to businesses with 11 or more staff parking spaces within the Oxford ring road. The funds raised from a WPL would be set aside to improve transport in and around the city.
- Improving priority and safety of sustainable modes through implementation of the Oxford Local Cycling and Walking Infrastructure Plan (LCWIP) (March 2020) and the Oxfordshire Strategic Active Travel Network (SATN) sets out priority infrastructure measures fundamental to achieving a step change in cycling and walking in Oxford in terms of infrastructure. This includes low traffic neighbourhoods (LTNs), and the introduction of active travel routes (Quickways, Quietways and Connector Routes). Whilst there are no specific targets for improving overall walking levels, the LCWIP supports measures to provide appropriate infrastructure for those with mobility issues, children and older people.
- The introduction of a Central Oxfordshire Movement and Place Framework (COMPF). A joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration.

Oxfordshire Housing and Growth Deal

2.13 The Oxfordshire Growth Board (now named the Future Oxfordshire Partnership) secured £215 million of Government investment for new homes and infrastructure across Oxfordshire in 2017, of which £60m is for affordable housing and £150m is for infrastructure improvements. Within Oxford City, funding from the Housing and Growth Deal is being used alongside match funding and other developer funding to fund technical work for infrastructure improvements that include a number of measures set out in the COTP, as well as complementary development work to support the reopening of the Cowley Branch Line; a new pedestrian and cycle bridge between Oxpens and Osney Mead and the Environment Agency's planned Oxford Flood Alleviation Scheme (OFAS).

Department for Transport's Local Growth Fund and Homes England's Housing Infrastructure Fund (HIF)

2.14 Oxfordshire County Council has secured funding from the above for improvements between Eynsham and Oxford. The A40 improvement programme which will improve the commutes of current and future residents as well as visitors to Oxford, includes a new bus lane between Eynsham and Oxford and upgraded walking and cycling facilities along the route.

Bus Service Improvement Plan (BSIP)

2.15 In March 2021 the Department for Transport published a new long-term national strategy for buses in England titled Bus Back Better. This asks local authorities and bus operators to work in partnership to develop ambitious plans to deliver better bus service in their area. Oxfordshire's Bus Service Improvement Plan was adopted in October 2021. It is reviewed annually with the latest update in June 2024. The Oxfordshire BSIP delivery plan 2025-26 which includes improvements in the Oxford City area was approved in March 2025.

2.16 In March 2022, Oxfordshire County Council was awarded funding from the government's Zero Emission Bus Regional Areas (ZEBRA) scheme. With additional funding from the council and bus companies Stagecoach and the Go Ahead Group, the ZEBRA scheme will deliver 159 electric buses and supporting charging infrastructure to Oxfordshire. Electric buses are now operational on many routes covering Oxford, helping to improve air quality within the city, reduce CO2 emissions and make bus travel a more attractive option.

Oxfordshire Rail Corridor Study

2.17 The Oxfordshire Rail Corridor Study (ORCS) (June 2021) was jointly funded by the Department for Transport, Oxfordshire Growth Board (now named the Future Oxfordshire Partnership) and other partners. It focuses on the movement of people and goods across the rail network in Oxfordshire, with particular emphasis on how rail can support growth and development across the County and the wider region and inform strategic decisions. The study identifies several strategic capacity requirements on the rail network as well as a need for better connectivity between key rail hubs within the county. For Oxford City, the introduction of East-West rail services from Milton Keynes/ Bletchley to Oxford requires

improvements to the capacity and upgrades at Oxford Rail Station which are being undertaken. Further service enhancements are also identified to enable new passenger services via the Cowley Branch Line to London with two new stations on the Branch Line. The study also identified a need for increases in freight path availability particularly between Didcot and Oxford, including 4- tracking of the rail line between Oxford Station and Radley. Work is currently underway to update the Oxfordshire Rail Strategy following publication of the LTCP.

Oxfordshire Connect

2.18 Oxfordshire Connect is a programme to upgrade Oxford Station and includes expanding the railway infrastructure and improving the local road network. The works include the replacement of the Botley Road bridge to enable upgrades to Oxford station, the wider railways and road, cycle and pedestrian routes as well as signalling and track upgrades. The outcomes the programme will bring include:

- A bigger, better station for everyone
- More services with East West Rail
- Additional rail capacity for the future
- An improved and safer road layout.

Electric Vehicle (EV) Charging Strategy

2.19 The Oxfordshire Electric Vehicle Infrastructure Strategy (OEVIS), adopted by Oxfordshire County Council in March 2021 sets out policies and plans to support the transition to zero emission road transport. This will help Oxfordshire to achieve net zero carbon, reduce air pollution, and deliver key transport initiatives such as the Oxford Zero Emission Zone (see above). The strategy is among the first of its kind in the UK and has been a collaborative piece of work between the County and five district councils of Oxfordshire.

2.20 Of the 17 OEVIS policies, those of most relevance to policy makers are Policy EVI7 and Policy EVI8:

2.21 Policy EVI 7: The Councils will seek to include statements & policies supportive of EV charging infrastructure and, where appropriate, references to the Oxfordshire Electric Vehicle Infrastructure Strategy in their planning standards and guidance;

2.22 Policy EVI 8: The Councils will benchmark nationally, and between themselves, each seeking to set minimum standards for the quantity of EV charging to be provided in developments in their planning requirements.

2.23 Oxford City has adopted its own Electric Vehicle Infrastructure Strategy (July 2022) and has installed a number of EV charge points across the city as part of the 'Go Ultra Low Oxford' project.

Oxford Local Plan 2036

2.24 The Oxford Local Plan 2036 is the current adopted Local Plan. The plan aims to reduce carbon emissions, encourage the use of sustainable transport modes and make the best use of land. Section 7 contains strong policies to help realise this strategy:

- Policy M1 seeks to promote sustainable transport choices by prioritising walking, cycling and public transport.
- Policy M2 seeks the submission of Transport Assessments/Statements and Travel Plans from development proposals that will have significant transport implications, with the intention of reducing car travel and encouraging the use of sustainable transport.
- Policy M3 requires new residential development to be car free in Controlled Parking Zones and no increases in parking provision and ideally a reduction, in all other areas. For non-residential developments the policy aspirations are to keep parking levels to an operational minimum, with a shift towards more sustainable travel modes. A low standard for car parking provision means that a greater proportion of scarce land can be used for providing homes and avoids issues of parking creating poor urban design. Reduced car parking, and therefore car ownership and car trips, is likely to reduce air pollution and noise levels. Fewer cars using the roads improves the attraction of walking, cycling, and spending time in the public realm.
- Policy M4 seeks the provision of electric charging points in new developments and
- Policy M5 addresses cycle parking provision.

Corporate Plan

2.25 Oxford City's Council's Strategy 2024-28 was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:

- Good, affordable homes;
- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council

2.26 The strategy identifies that achieving a Zero Carbon Oxford will require a citywide effort, involving local and national government, businesses, institutions and citizens. To help achieve a Zero Carbon Oxford, priorities for the City Council include:

- Decarbonising homes and other buildings and securing the additional funding required to meet the target of becoming a zero carbon council by 2030 and a net zero city by 2040
- Maintain and improve parks, green spaces, biodiversity and access to nature
- Develop low carbon infrastructure and support households, businesses and institutions to save energy and cut emissions

2.27 Commitments to achieve these priorities include:

- Ensuring all homes and other buildings are built to high standards with good energy efficiency;
- Maintain and improve biodiversity in our green spaces and access to nature in the city; ensure building projects support biodiversity by providing land for OX Place and other developers to use for Biodiversity Net Gain locally when exceptional circumstances mean it cannot be delivered on the building site itself; and
- Working with partners to deliver a Local Area Energy Plan for Oxford to support decarbonisation and infrastructure development

2.28 To help enable a strong fair economy, the City Council commits to maximising the local benefit from investment in a new station for Oxford, and continuing to work for the Cowley Branch line extension.

2.29 The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. It is underpinned by the Medium-Term Financial Strategy 2026-27 to 2028-29 that sets out the financial priorities and commitments over the next three years. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators. In turn the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford Climate Emergency

2.30 In January 2019, Oxford declared a climate emergency and in autumn 2019 was the first city to hold a Citizen's Assembly on Climate Change. Since 2019 work has continued to tackle the climate emergency and Zero Carbon Oxford is the goal for Oxford to achieve net zero carbon emissions across the city as a whole by the year 2040, 10 years ahead of the legal deadline set by Government.

2.31 In February 2021, the Zero Carbon Oxford Partnership was created, comprising a group of leaders from Oxford's main institutions and employers, including the universities, hospitals, businesses and other organisations. The Zero Carbon Oxford roadmap and Action Plan was published in July 2021 outlining how the 2040 target can be achieved. Zero Carbon Oxford projects include Energy Superhub Oxford, Europe's most powerful electric vehicle charging hub; Oxford Zero Emission Zone (see above), introduced by Oxfordshire County Council and Oxford City Council to improve air quality, cut carbon emissions, and move towards zero emission travel in the city; and Go Ultra Low Oxford which provides electric car charging solutions for Oxford residents who do not have a driveway.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Oxford is a city recognised for its high levels of walking and cycling however, the LCWIP identifies that cycling conditions, provision and routes are often very poor. The cycling

section of the Active Travel Strategy and the Oxford LCWIP sets targets to increase both commuter cycling and all cycling trips in Oxford by 50% by 2031.

3.2 Figure 3.1 shows the number of cycle trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of cycling trips per week in Oxford fell from 2019 to 2021, which is most likely because of the Covid 19 pandemic. Since 2021 the number of trips has increased but have not returned to those recorded pre pandemic. NB the surveys were conducted during different months in each year which does have an impact upon cycling take up.

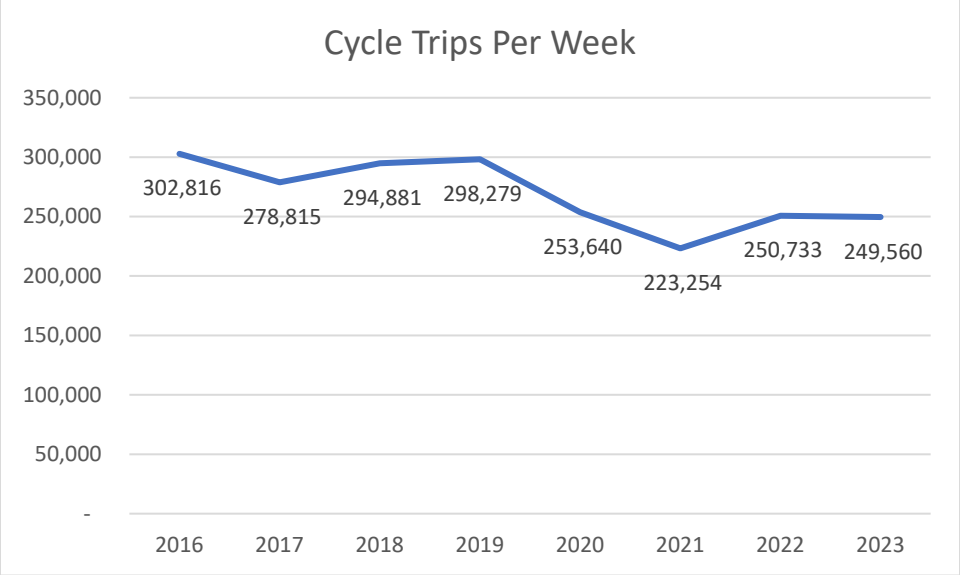

Figure 3.1 - Total number of cycle trips per week 2016 – 2023

3.3 Figure 3.2 shows the number of walking trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of walking trips per week has fluctuated over the years, with the lowest number of trips occurring during 2017. More recent data shows that the number of trips has been increasing since 2021 and now exceeds the previous recorded high in 2018.

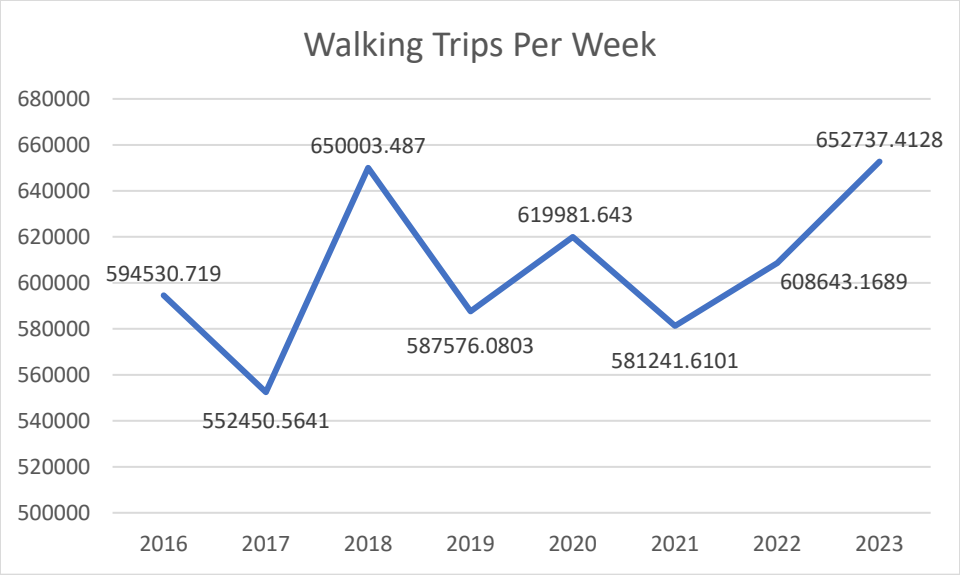

Figure 3.2 - Total number of walking trips per week 2016 – 2023

3.4 In terms of commuter travel, Figure 3.3 shows a comparison of the transport mode share of Oxford with the rest of Oxfordshire and nationally. This comparison uses data from the 2021 census which was undertaken during the COVID-19 pandemic. Census Day was in March 2021 during the national lockdown and although the census addressed questions related to Travel to Work, it did not collect any workplace address information for those working at home, including those following government guidance to do so. Furthermore there were large numbers of people still being supported by government furlough schemes and it is not clear whether the Office of National Statistics (ONS) guidance issued in relation to this question was followed; some people may have provided travel information for the last time they worked, or they may have answered with their behaviours on Census Day.

3.5 Notwithstanding the above, the data which includes a 'working from home' category (that accounts for residents who live in Oxford and work remotely (i.e. do not commute)) shows that when compared to the rest of the Oxfordshire and nationally, Oxford has a much higher share of people commuting to work on foot and by bicycle or bus. Consequently, the percentage of people travelling to work by train, or by car or van is much lower than national averages.

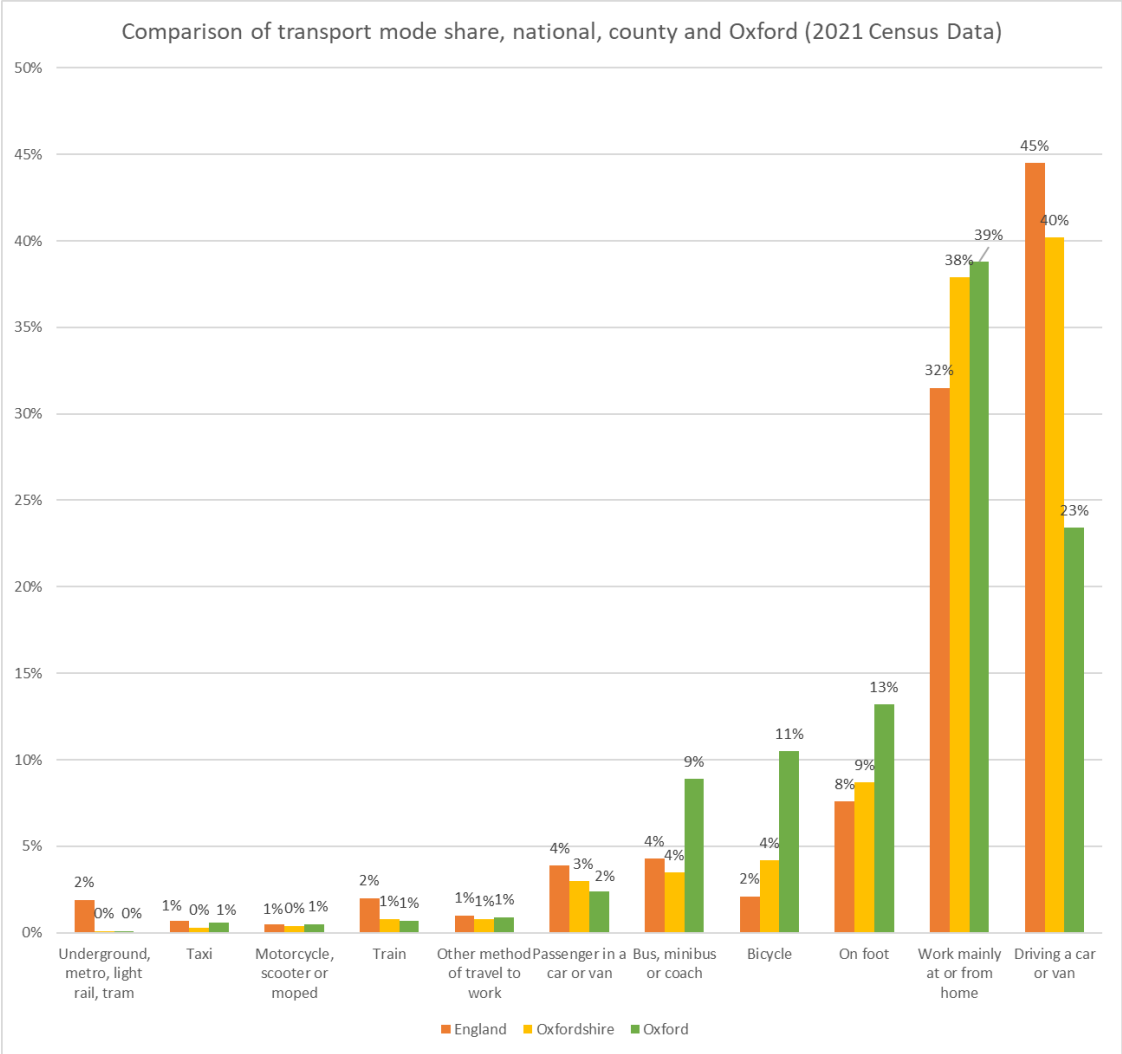

Figure 3.3 - Transport mode share for Oxford, Oxfordshire and England (2021 Census)

3.6 Whilst it is not possible to analyse origin destination by mode of transport from the 2021 census dataset, it is possible to review the journey origin data for commuters to Oxford. At the time of the 2021 census, a total of 92,047 people worked in Oxford, including 34,732 who worked from home or had no fixed place of work, and 28,973 who travelled within the area. Excluding those 'working from home' and those 'who lived within the Oxford boundary', the largest movement into Oxford was from the Vale of White Horse, followed by Cherwell and South Oxfordshire as shown in Figure 3.4 below.

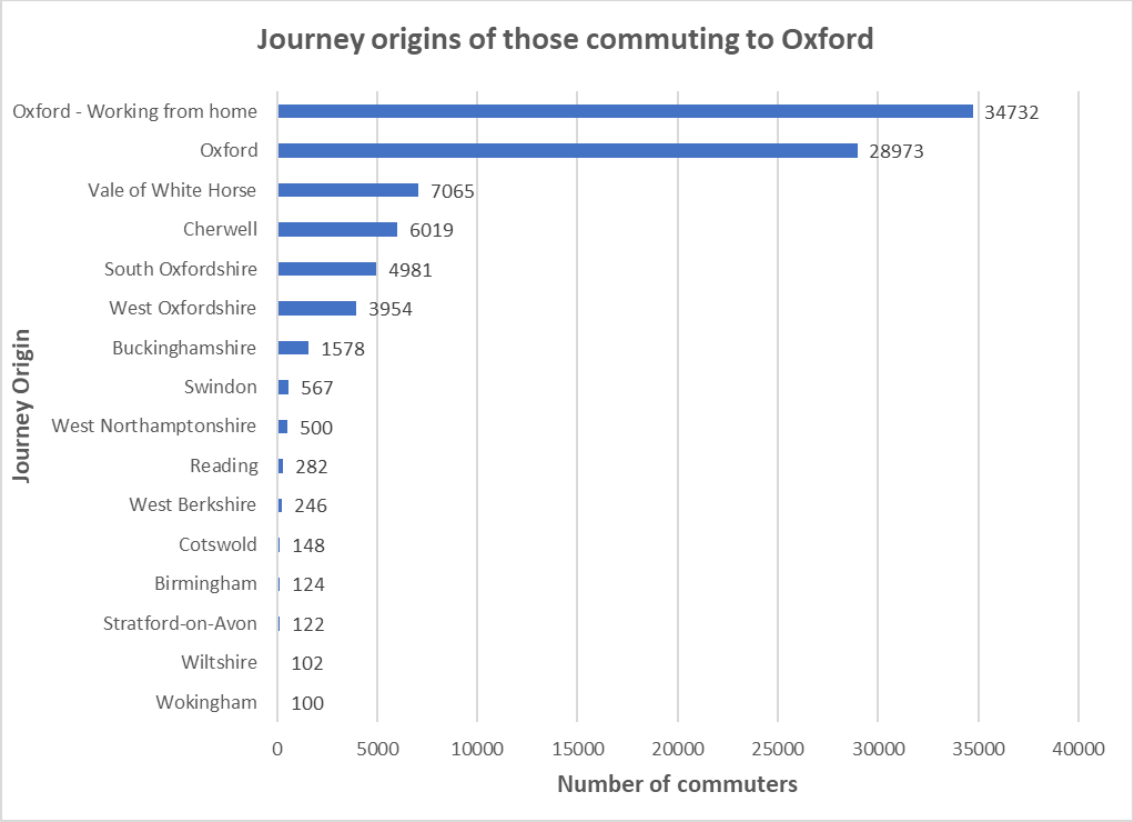

Figure 3.4 - Journey origin data for commuters to Oxford.

3.7 Within Oxford itself, it is possible to review the origin and destination of working people within specific wards of the city by using the Origin-Destination Explorer and then using the Census 2021 Maps to identify Middle Super Output Areas (MSOAs). Table 3.1 below identifies origin and destination data for wards in the east of the city that are either near or contain areas of employment (e.g. the Science Park, ARC Oxford (former Oxford Business Park), BMW, and the Headington hospitals). The data set for Oxford (all wards) has also been included as a reference point.

Table 3.1 - Origin Destination Data for city wards

Area (MSOA)	Lived here	Worked here	Lived and worked here	Travelled to another area to work	Travelled from another area to work	Go (out) to work to:	Come to work from:
Oxford	73,324	92,047	63,705	9,619	28,342	Vale of White Horse (2,292), South Oxfordshire (1,702), and	Vale of White Horse (7,065), Cherwell (6,019), and South

						Cherwell (1,638)	Oxfordshire (4,981)
Littlemore & Rose Hill	5,500	5,293	2,484	3,016	2,809	Oxford Central (418), Lye Valley and Cowley East (403), Headington (374)	Greater Leys (160), Blackbird Leys (157), Cowley South and Iffley (151)
Blackbird Leys	3,116	2,240	1,062	2,054	1,178	Lye Valley and Cowley Easy (386), Headington (261), and Oxford Central (257)	Greater Leys (123), Littlemore and Rose Hill (106), and Lye Valley and Cowley East (79)
Greater Leys	3,332	1,479	1,098	2,234	381	Lye Valley and Cowley East (348), Headington (284), and Oxford Central (253).	Blackbird Leys (64), Littlemore and Rose Hill (42), Cowley South and Iffley (26)
Cowley North	4,076	2,862	1,938	2,138	924	Oxford Central (452), Headington (316), and Lye Valley and Cowley East (223)	Cowley South and Iffley (66), Littlemore and Rose Hill (57), Lye Valley and Cowley East (49)
Cowley South and Iffley	5,482	4,478	2,611	2,871	1,867	Oxford Central (549), Lye Valley and Cowley East (429), Headington (335)	Littlemore and Rose Hill (205), Greater Leys (121), and Blackbird Leys (118)
Lye Valley and Cowley East	4,064	8,713	1,916	2,148	6,797	Headington (533), Oxford Central	Cowley South and Iffley (429), Littlemore

						(316), and Churchill (203)	and Rose Hill (403), and Blackbird Leys (386)
Headington	5,166	16,693	3,402	1,764	13,291	Oxford Central (345), Churchill (273), East Central Oxford (78)	Barton (821), Churchill (723), and Risinghurst and Sandhills (693).

3.8 Table 3.1 shows that the largest movement of people out of Littlemore and Rose Hill, Cowley North and Cowley South, Iffley and Headington was to Oxford Central. The largest movement of people out of Blackbird Leys and Greater Leys was to Lye Valley and Cowley East, and the largest movement of people out of Lye Valley and Cowley East was to Headington.

3.9 The strategic road network around Oxford is primarily served by the A34, A40, A420, and the ring road. Within Oxford, key arterial routes accommodate large amounts of vehicular traffic; sharing these with strategic bus routes that connect Oxfordshire's principal towns and settlements (such as Abingdon, Banbury, Bicester, Didcot, Kidlington, Thame, Wantage, and Witney) as shown in Figure X. Banbury, Bicester, and Didcot, as well as a number of smaller villages are also connected to Oxford via the railway network. Together, the bus and railway network provide opportunities for commuter traffic from neighbouring authorities to access the city by sustainable modes. National Cycle Routes 5 and 57 also provide access to the National Cycle Network, with connections to Bicester, Didcot, Kidlington and Thame; as well as several smaller villages on these routes.

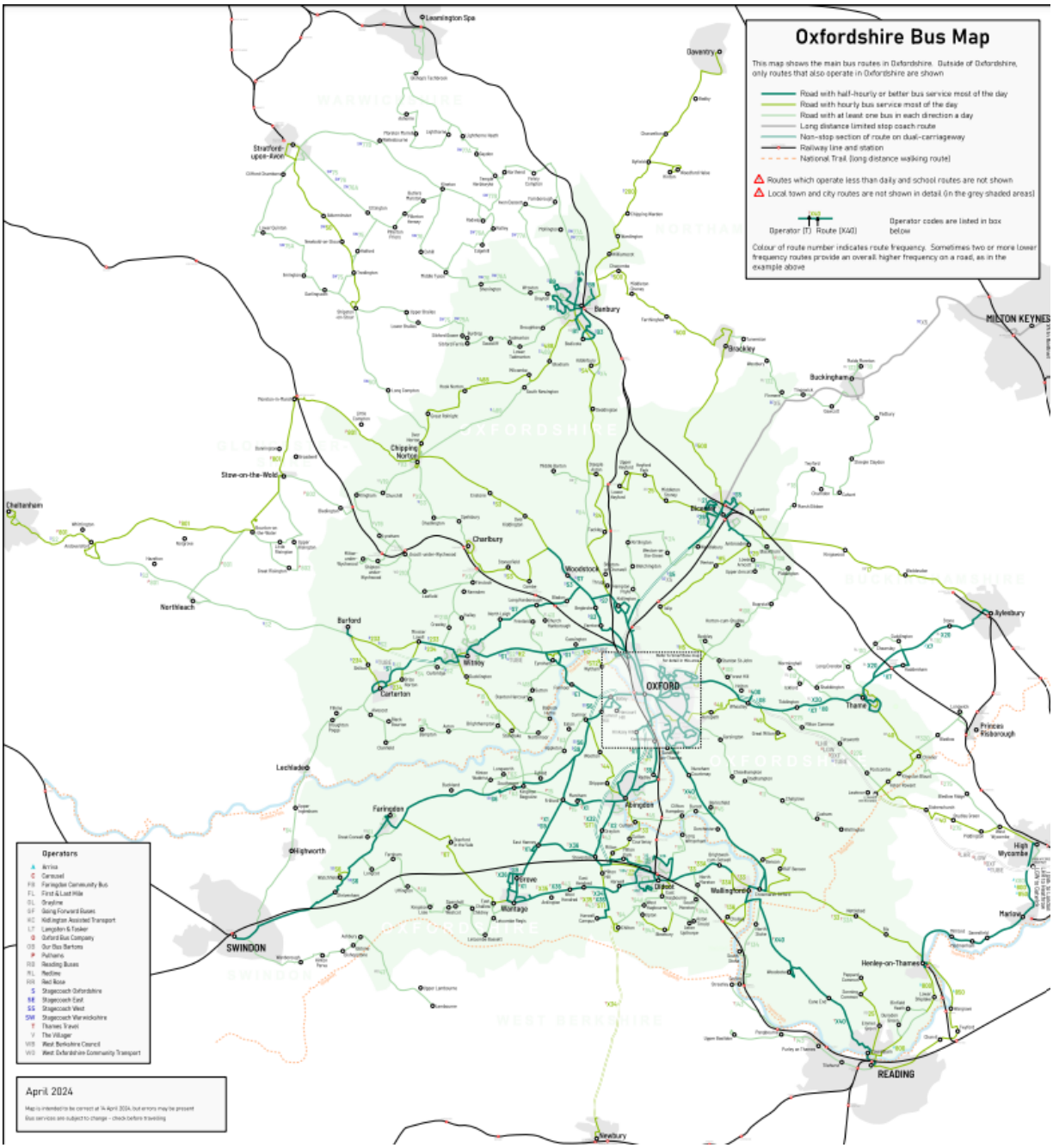

Figure 3.5 - Oxfordshire Bus Map (reproduced here with permission of Oxfordshire County Council)

3.10 Despite having very good bus services and higher levels of cycling and public transport use than many comparable cities in the country, congestion on Oxford's main roads is endemic. The entire city of Oxford has been a designated Air Quality Management Area (AQMA) for NO_2 since 2010 and whilst air pollution levels have significantly improved in the city over the last few years, Oxford City Council is aware that there's still more to be done. The latest Air Quality Annual Status Report (June 2024) indicates that the transport sector continues to be the largest contributor (68%) to total emissions of Nitrogen Oxides (NO + NO_2) in the city, followed by domestic combustion (19%), combustion from industry and services (12%)

and others: waste, agriculture, solvents, nature (<1%). The Natural Resources background paper (BGP.10) provides more information on air quality in the city and the strategies that are in place to improve it.

Motor Vehicle Parking

3.11 In a compact city like Oxford where there are many competing demands on space, it is important to consider whether using large areas of land for parking of vehicles is appropriate. Vehicle parking is usually an inefficient use of land. However, there will be those who need to drive or who drive to access certain areas at certain times and for particular types of trips. The needs of people to access services and potential impacts on local centres if there is not enough parking must be balanced against the negative effects of car traffic generation.

3.12 *Public Car Parking in City and District Centres* **-** With regards to public parking provision, the current Local Plan's strategy is that in the city centre, levels of public parking will be maintained at approximately the same levels, with a discouragement of arrivals during network peaks. Meanwhile, within district centres it is to maintain roughly current levels of public parking.

3.13 *Residential Parking* - The current Oxford Local Plan 2036 permits only low levels of residential parking for new residential developments. The majority of the city has an excellent existing level of public transport provision, as well as good connectivity by walking and cycling, therefore, in certain circumstances, Policy M3 of the Local Plan requires residential developments to be "car free"; that is they will have no general parking spaces provided for residents. Policy M3 allows for some parking however, for example for disabled and visitors, ensuring there are not negative consequences for accessibility for the elderly, disabled and vulnerable groups.

3.14 *Controlled Parking Zones (CPZs) –* Large parts of the city are already covered by a CPZ (an area where parking is only permitted in designated parking bays, and the rest of the kerbside space is restricted by yellow lines) as shown on the map in Figure xx below. Where CPZs have been implemented they have been extremely successful in removing commuter parking. Further expansion of CPZs is currently being rolled out by Oxfordshire County Council, and Oxford City Council supports these measures and efforts to ensure that increases in residential population and/or in visitors do not bring about increases in the number of vehicles parked in an area. In CPZs, new developments with little private parking are less likely to have a negative impact on surrounding areas, as parking cannot be displaced to the street. Over time it is likely that most streets in the city will be covered by parking restrictions.

Figure 3.6 Controlled parking zones in Oxford (November 2024 Oxfordshire County Council)

TO ADD

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Without a new Local Plan, the policies within the current Local Plan 2036 would remain in place until 2036 or until they become otherwise out of date. At this point the National Planning Policy Framework would take over as a default. These policies should help deliver increased use of sustainable modes of transport within Oxford. The residential car parking policies should help reduce car ownership on new build developments. Other policies seek to safeguard land for the potential reopening of the Cowley Branch Line for passenger services and support the redevelopment of Oxford Rail Station.

4.2 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. Both Oxfordshire County Council and Oxford City Council are preparing detailed measures for implementing the Central Oxfordshire Travel Plan. This will include traffic filters, the introduction of a workplace parking levy, and an extended zero emission zone in the city centre.

4.3 Without a new Local Plan, these measures will still come forward, but the existing policies will remain as drafted when the plan was adopted in 2020 and in time, will become out of date whereas the evidence base and influencing strategies as described above, will have continued to develop and evolve, and the urgency with which we need to address the climate emergency will also have increased. A new Local Plan provides the opportunity for the existing policies to evolve and be further developed to ensure that the issues affecting Oxford are addressed.

5. Options for Local Plan 2042 Policies

5.1 The analysis set out in the previous sections of this background paper indicate that the Local Plan 2042 will need to take account of existing and emerging transport strategies for Oxford including those that the County Council as LHA are leading on. These strategies will help shape policies that encourage travel by sustainable modes, such as walking, wheeling, cycling, and public transport, helping to continue to address the transport sector's contribution to climate change in Oxford.

5.2 The Local Plan 2042 therefore includes proposed policies in response to five topics:

- Transport Assessments/Statements, Travel Plans and Service and Delivery Plans,
- Bicycle Parking,
- Motor cycle and Powered Two Wheeler Parking,
- Motor Vehicle Parking Design Standards, and
- Electric Vehicle Charging

5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these ‘options sets’ are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 012a (draft Policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

5.5 Key tools to appraise and determine the transport impacts of a development proposal are Transport Assessments (TA)/Statements (TS), Travel Plans (TPs), Construction Management Plans (CMPs) and Service and Delivery Plans (SDPs). TA/Ss are a comprehensive and systematic approaches to ensure that the transport impacts of the development are properly considered and where appropriate include measures to help mitigate development impact. TPs are a package of measures tailored to suit the needs of an individual site and focus on reducing dependence on the private car. CMPs set out measures to minimise and mitigate the impacts of construction traffic and SDPs set out measures that will be introduced to minimise impacts of servicing and delivery traffic and are required to be submitted for development proposals that will affect the city centre or district centres and also for sites in close proximity to residential areas.

5.6 The options for the policy that have been considered for LP2042 relate to the extent of requirements for submission of TAs/TSs, TPs, Construction Management Plans and SDPs in support of development proposals.

Table 5.1 - Policy options set 012a: Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require transport assessments/ statements and travel plans to review transport impacts and show transport measures proposed to mitigate them, for all development that is likely to have significant transport implications.	This approach will encourage measures that reduce the need to travel and manage congestion. In addition, more sustainable modes of travel are promoted as part of these assessments. Transport Assessments/Statements should include, for example, targets associated with the proportion of journeys made to and from the development site by travel modes more sustainable than the private car, and measures such as bus passes.	These requirements could be seen as an extra burden on developers and those assessing applications. Travel Plans, to be effective, need monitoring, managing and where necessary enforcing. If the proposal is for employment activities, employers need to ensure that employees abide by the Travel Plan with appropriate sanctions for non-compliance.

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option b Require transport assessments/statements to also include construction management plans and service and delivery plans, where relevant.	Including construction management plans and service and delivery plans as part of the assessment process will also help to mitigate the impacts of construction, freight and service vehicles by requiring consideration of measures to minimise any issues that may arise, such as managing delivery times or construction materials. This is particularly important in busy and confined areas such as the city centre and for sites near residential areas.	These requirements could be seen as an extra burden on developers and those assessing applications.
Option c Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Not requiring these reduces the burden on developers and assessors.	The assessment and mitigation of transport impacts of development schemes are crucial to their success or failure. Requiring an assessment as part of a planning application is the only way to secure the required information on which to make a sound planning decision. Without a requirement to assess and manage traffic impacts there may be an increase in congestion and a lack of encouragement and provision for active travel.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option a & b or Option c

High-level screening conclusion? - the options are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? - No

Rationale: Option a could either be stand alone or incorporated alongside option b. Option b is not strictly an alternative, but rather an additional option that could be added to a policy. Option c is the alternative.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution and criterion 6. to provide accessible essential services and facilities** and the level of sustainability impact is unlikely to vary significantly between option a and b. Both option a and option b would have a minor positive impact for access. Option a and b would have a minor positive impact for air quality; however, option b would potentially have a slightly more positive impact as it would also require consideration of construction traffic management and service and delivery plans which could result in further traffic reduction and associated air pollution (dust and fumes from equipment). Option c would have a minor negative impact as there is no direct national policy, and without any requirements in place it could exacerbate current congestion and air quality issues. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

780

Policy options set 012b (draft Policy C7): Bicycle Parking Design Standards

5.7 If travel by sustainable modes of transport such as bicycle is to be encouraged, it is important to ensure that there is secure bicycle parking in residential and employment developments. The options for the policy relate to how far the Local Plan 2042 should go in relation to levels of parking required for bicycles.

Table 5.2 - Policy options set 012b: Bicycle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require high levels of secure bicycle parking either indoors or external for residential and non-residential schemes to achieve best design outcomes.	The provision of a high level of well-designed cycle parking will help to encourage cycling across the city which brings positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthy	Providing well designed secure cycle facilities could add to build costs and take up space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.

	lifestyles. This could increase the number of people cycling to work, to the shops, for health appointments, to school etc. as they will be confident that their bike will be parked in a safe secure way which would reduce the risk of theft or vandalism. This is particularly important with the rise in e-bikes. Also well designed bike parking can enhance the public realm.	
Option b Set more specific requirements for the type of bicycle parking for residential developments and workplaces to make sure e-bikes, trailers, tricycles etc. can be accommodated. Require higher levels of well-designed and secure bicycle parking and ensure that showers and lockers are provided to support staff.	More specialist types of bikes are increasingly common providing the option of cycling to a wider range of people. They also have more complex storage and charging requirements which won't necessary be met if the requirement for them is not set out clearly. Although showers are currently required for offices over 500m2 and most other non-residential uses over 2500m2 this approach encourages more provision for cyclists.	This adds an extra requirement for space and potentially cost, which may compete with other requirements.
Option c Lower the residential and non-residential bicycle parking standards from existing levels.	There is no loss of amenity space or indoor living space. This approach would help to reduce build costs for the scheme.	If insufficient or poorly designed bicycle parking is provided in new development, it is likely that bicycles will be parked informally in inappropriate areas causing clutter and obstruction. It provides no encouragement for future residents to consider cycling and embracing a more active and healthier lifestyle – lower

		levels of cycle parking may make it more difficult for people to store bikes and as such bike ownership could drop as travelling by bike is not practical without secure storage. There are already concerns across the city about bicycle parking stress and concerns about security particularly from those with more expensive bikes which are more at risk from being stolen. If Oxford is to become a cycling city reducing the levels of parking provision would be a disincentive to people who might be considering how to travel around the city other than by private car.
Option d No local policy standards	Not requiring these reduces the burden on developers.	Bicycles may be parked in inappropriate areas, potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** All options are standalone and represent various levels of cycle parking that the local plan could ask for. In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (supporting active travel options) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting active travel). Option a and option b would both have a minor positive impact for all

the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some cycle space but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three criteria, as whilst there is potential for a developer to still provide cycle parking provision this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other less sustainable forms of transport e.g car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Policy options set 012c (draft Policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards

5.8 Parking provision for motor cycle and powered two wheelers is also important and should be considered at the design stage to ensure the most efficient use of land and encourage the use of this mode of transport. The options for the policy relate to how far the Local Plan 2042 should go in relation to levels of parking for these vehicles.

Table 5.3 - Policy options set 012c: Motorcycle and Powered Two Wheelers Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require high levels of secure motorcycle and powered two-wheeler parking for residential and non-residential schemes to achieve best design outcomes.	The provision of a high level of well-designed parking would reduce the risk of theft or vandalism. Also well designed parking can enhance the public realm.	Providing well designed secure facilities could add to build costs and take up space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.
Option b Set more specific requirements for the type of parking for residential developments and workplaces and ensure that showers and lockers are	Although showers are currently required for offices over 500m2 and most other non-residential uses over 2500m2 this approach encourages more provision for	This adds an extra requirement for space and potentially cost, which may compete with other requirements.

provided to support staff who use these modes of travel.	those who use motorcycles and powered two wheelers.	
Option c Lower the residential and non-residential motorcycle and powered two-wheeler parking standards from existing levels.	There is no loss of amenity space. This approach would help to reduce build costs for the scheme.	If insufficient or poorly designed parking is provided in new development it is likely that motorcycles and powered two wheelers will be parked informally in inappropriate areas causing clutter and obstruction.
Option d Do not set any parking standards for motorcycles and powered two wheelers.	Not requiring these reduces the burden on developers.	Motorcycles and powered two wheelers may be parked in inappropriate areas potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** All options are standalone and represent various levels of parking for motorcycles and powered two wheelers that the local plan could ask for. In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Option a and option b would both have a minor positive impact for all the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some parking provision but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three

criteria, as whilst there is potential for a developer to still provide parking for motorcycles and powered two wheelers this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other forms of transport e.g. car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Policy options set 012d (draft Policy C8): Motor Vehicle Parking Design Standards

5.9 Setting the right level of parking for motor vehicles can positively influence design outcomes, ensure the most efficient use of land and encourage residents to consider alternative options to using a private car. If standards are too low, a potential unintended effect is that parking is displaced to surrounding streets that do not have any parking restrictions. Although Controlled Parking Zones (CPZs) can prevent this from happening there are still parts of the city that are not included within a CPZ or where parking restrictions are not in place 24 hours a day, 7 days a week. Whilst the LP2042 will have limited influence over the implementation of new or review of existing CPZs within the city, where planning permission is required, the levels of parking for motor vehicles can be considered.

5.10 The options set out below therefore focus on how parking levels could be considered in applications for both residential and non residential developments.

5.11 For residential developments, low car would mean no car parking spaces allocated to a particular housing unit, instead, only a number of shared spaces and spaces for blue badge holders, service and delivery vehicles, including for working drivers.

5.12 For non-residential developments, low car would mean either a reduction in existing car parking spaces where there is good accessibility for the area or provision of a number of shared spaces and spaces for blue badge holders, service and delivery vehicles.

5.13 Parking standards assumes the Council would apply County standards. This means that for residential, there will be more parking provision per household (e.g. one space per dwelling).

5.14 For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision.

Table 5.4 - Policy options set 012d: Motor Vehicle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car ownership and car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer, and parents may feel more confident allowing their children to cycle or walk if there is less traffic on the roads. Supports the use of car clubs across the city. Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	Although sites are low car it could result in parking being displaced to other streets which are not restricted. In some parts of the city outside of the centres there are insufficient realistic alternative transport options other than using the car. Some occupations require employees to have a vehicle or take a vehicle home – many such jobs are low paid (e.g. mobile carers; maintenance trades; mini-cab drivers; etc.). Many households also work outside of the city; away from the city or district centres; have children to take to school on the way to work; or work outside of the usual operating hours for bus services. Households that include persons in these occupations risk being excluded from housing that might best meet their needs, if low car schemes become predominant in new housing developments. Having low car parking provision for larger family dwellings for sale may

		impact on the viability of schemes, and the ability to deliver affordable housing.
Option b Adopt parking standards for residential developments	Ensures that the design of car parking is properly considered and encourages private car ownership. Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.
Option c Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer. Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution. The inadequate provision of parking at a site could lead to displaced parking on nearby streets creating parking stress elsewhere if there is no CPZ in operation.
Option d		

Adopt parking standards for non-residential developments.	Ensures that the design of car parking is properly considered Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a + c, Option a + d, Option b + c, Option b + d
High-level screening conclusion? - the options are likely to have significant sustainability impacts
Screened in for detailed appraisal? - Yes

Rationale: The options represent various levels of motor vehicle parking that the local plan could ask for. Assuming that options b and d are allowing a greater level of parking on sites than low car as in options a and c.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Whilst all options allow for parking, options a and c could be neutral to positive as this would likely drive reductions in the amount of parking across residential and non-residential sites. Options b and d would potentially be neutral to negative in terms of impact against the same criteria, this would depend upon implementation e.g. being more neutral where a site already has car parking and the standards would not allow for increases, but negative where provision is currently below the standard and there would be scope to increase levels of car parking.

In addition, option b may also have an indirect positive impact on **criterion 4 Local housing needs,** improving viability of new residential development because increased car parking can be provided. Option c, may have indirect impacts on **criterion 12 economic growth**, depending upon implementation, potentially having a neutral impact in terms of viability on new non-residential development where there is existing parking provision, or a more negative impact where there is no existing provision and they are unable to provide as much car parking which could impact viability.

Overall, there are varying sustainability impacts across the criteria depending on whether low car options are selected or not. As there is uncertainty about the impacts and whether they will be significant or not, the options should be screened in for further detailed appraisal.

Policy options set 012e (draft Policy C9): Electric Vehicle Charging

5.15 The increase in ownership and use of electric vehicles has placed greater demand for charging infrastructure in both residential and commercial developments as well as in public spaces such as public car parks, leisure centres and shopping centres. The current local plan does not include a policy to address Electric Vehicle Charging and although the delivery of infrastructure for charging vehicles is now covered by Building Regulations the options considered for LP2042 relate to how much further local design standards could go beyond what is being asked for in national building regulations.

Table 5.5 - Policy options set 012e: Electric Vehicle Charging

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek the provision of electric vehicle charging infrastructure on all new residential developments with a dedicated parking space and on all non-residential development providing additional car parking bays. Where there is no dedicated parking space and on street parking is proposed, appropriate infrastructure should be incorporated to enable the charging of electric vehicles on the street.	The NPPF indicates that when setting parking standards, policies should take into account an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. The provision of electric vehicle charging infrastructure for residential and non-residential developments supports the NPPF. It may also increase the market value of homes and non-residential developments. Demand on the electricity grid can be assessed at the time of application.	The requirement for the provision of EV infrastructure could lead to additional costs being incurred by developers for example there may not be adequate grid capacity

All blue badge and car club parking bays must be electrified.		
Option b Specify design standards for EVs being installed – e.g. in relation to impact on streetscape, safety etc.	This could help to ensure that a particular local context is considered (e.g. minimising harm to heritage assets or cluttering the street).	Design standards could change quite rapidly as technology develops. It might be challenging to be too specific at the Local Plan level (e.g. site context could differ a lot across the city). It might be better to direct applicants to other guidance/TANs.
Option c Do not seek any electric vehicle charging infrastructure on new residential developments or on non-residential developments and do not set any local design standards.	Associated costs of providing this infrastructure are not incurred by landowners/ developers.	Residents of new developments or employees at workplaces who have electric vehicles would not have access to charging infrastructure at their own property

790

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - Option a, Option a + b, or Option c **High-level screening conclusion? -** the options are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** Option a is about requiring new EV charging points, Option b is about adding design considerations to the policy, and option c is an alternative to option a (or a+b) and essentially leaving standards to national regs. In terms of sustainability impacts, the options relate to **criterion 8. Traffic and Air Pollution**, as well as **criterion 11 Urban design** (reducing harm to the amenity and local context from new EV equipment) and **1. Carbon emissions** (supporting occupiers to adopt lower carbon transport options). Options a and b both have minor positive impacts for criteria 8 and criteria 1 because they can support occupiers to choose low carbon transport options. Option a potentially has a minor negative impact on criterion

11, particularly where new EV equipment clutters up streetscape or causes harm to nearby heritage assets due to poor quality design. Option b would have a neutral impact for criterion 11 because it helps to ensure the harm to urban realm and heritage is mitigated. Option c would have a neutral impact for criteria 8 and 1, because Buildings Regs will require charging infrastructure to support EVs for most new development, however it would again potentially have a minor negative impact for criterion 11, for the same reasons as discussed under option a above. In conclusion, the sustainability impacts arising from the different options would be minor, and are not considered to warrant a detailed appraisal.

6. Conclusions including preferred approaches for Local Plan 2042

6.1 Although Oxford is known for its high levels of walking, cycling and public transport use, Oxford's roads are still congested, with correspondingly poor air quality. In order to become carbon neutral and combat climate change, it is therefore important that the Local Plan addresses both existing and emerging transport strategies for the city.

Key sustainability issues for the Local Plan to address:

Reducing traffic and associated air pollution:

- Supporting and encouraging travel by active and sustainable travel modes will help to reduce many forms of pollution but especially air pollution which is not only harmful to people's health but is also constraining development opportunities because of its impact upon the habitat and species of the Oxford Meadow Special Area of Conservation.
- Reducing the number of journeys made by private vehicles can help ease congestion which will encourage more people to commute by walking or cycling.

To provide accessible essential services and facilities:

- The restrictions on car use in the city must be supported via a strong and affordable public transport infrastructure network.
- The plan should aim to continue to improve transport connections between the city and surrounding areas to help with the integration of settlements throughout Oxfordshire.

Carbon emissions:

- The improvement of renewable transport provision and the proposed restrictions of cars in the city centre will help to achieve a zero carbon Oxford.
- Journeys made by active modes rather than by car can help to reduce air pollution.

Good urban design:

- Designing in secure parking for bicycles and powered two wheelers at the outset of a proposal will help to minimize the risk of theft or vandalism and should ensure that dedicated parking areas for these types or vehicles are not put in as an afterthought in an underutilized or unattractive area that is then not used.

6.1. Preferred approaches for the Local Plan 2042

6.2 Section 5 identified that there were a number of topics for which the Local Plan 2042 could implement policy to address transport and movement. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them.

6.3 Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Transport Assessments, Travel Plans and Service and Delivery Plans – Draft Policy C6:

6.4 The preferred approach for the Local Plan 2042 policy is to take forward a combination of **Options A and B**. Together these options will help to encourage measures that reduce the need to travel, manage congestion and consider from the outset how more sustainable modes of travel can be promoted. The requirement for Construction Management Plans and Service and Delivery Plans will also help mitigate the impacts of the development.

Bicycle and powered Two Wheeler Parking Standards – Draft Policy C7

6.5 The preferred approach is a combination of options from Table 012b and 012c. In Options Table 012b the preferred approach is a combination of **Option A and Option B** which together are considered to bring positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthier lifestyles. In Options Table 12c the preferred approach is **Option A** which is considered to bring positive benefits as the provision of well designed parking reduces the risk of theft or vandalism and can also provide enhanced public realm for example by reducing opportunity for inappropriate parking of these types of vehicles. For the purposes of the Local Plan 2042 it was considered that merging the requirements of both Bicycle and Powered Two Wheeler Parking into the same policy would be the best way forward.

Motor Vehicle Parking Design Standards – Draft Policy C8

6.6 The preferred approach for this topic is a combination of **Options A and B and Option C** as they push for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport but accept that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability.

6.7 The options set was tested through the Sustainability Appraisal with the options having varying impacts. Seeking low car where possible will help to maximise positive sustainability impacts but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward.

Electric Vehicle (EV) Parking – Draft Policy C9

6.8 The preferred approach for this topic is a combination of **Option A and Option B**. Whilst recognised that EV infrastructure is part of Building Legislation, the NPPF makes it clear that if setting parking standards, policies should take into account the provision of spaces for charging plug-in and other ultra low emission vehicles. Option A seeks the provision of EV infrastructure on all residential developments and on non residential developments that would provide additional parking spaces. It also includes the provision of EV parking

for blue badge and car club bays. Option B goes further by including reference to design standards that could help to ensure that EV infrastructure does not cause harm to a particular local context, for example in Conservation Areas.

Background paper 13

Title: Liveable city

This paper addresses: Community and cultural facilities, healthcare, schools, leisure and recreation and retail.
SA Objective(s): 6. To provide accessible essential **services and facilities**.
SEA theme(s): Material Assets, Human Health

1. Introduction 2

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 2

Plans Policies and Programmes 2

National Planning Policy Framework (NPPF) 2

Oxford Local Plan 2036 3

Corporate Plan 4

Oxford City Council's Thriving Communities Strategy 4

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 5

Existing community and leisure facilities 5

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 9

5. Options for Local Plan 2042 policies 9

Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres 10

Policy options set 013b (Draft Policy C2): Maintaining vibrant centres 13

Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities 15

Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities 18

Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions 20

Policy options set 013f (proposed policy C4): Provision of New Learning and Non-Residential Institutions 22

Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions 23
Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions 25
6. Conclusions including preferred approaches for Local Plan 2042 27
6.1. Preferred approaches for the Local Plan 2042.....28

1. Introduction

This paper focuses on Oxford as a liveable city looking more specifically at the community and cultural facilities that help foster a sense of community and belonging, enhancing health and wellbeing.

The paper provides a context for considering the subject by providing a brief summary of the relevant national and local plans, policies and programmes that currently exist and will influence change in the future. This paper identifies some of the key challenges and future trends that will impact on these facilities. The paper then explores what would happen without a plan and the potential difficulties that the city would face.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

Plans Policies and Programmes

National Planning Policy Framework (NPPF)

The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 recognises that this comprises achieving three overarching objectives, which are independent but need to be pursued in mutually supportive ways. These comprise economic, social and environmental objectives. The social objective is required 'to support strong, vibrant and healthy communities, …. and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being' (para 8b); 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of development, and make sufficient provision for:... c) community facilities (such as health, education and cultural infrastructure)' (para 20). 'Non- strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas,

neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level....' (para 29). Chapter 8 of the framework addresses the promotion of healthy and safe communities suggesting that planning policies and decisions should aim to achieve healthy, inclusive and safe places which 'enable and support healthy lives' (para 96c).

The framework also states that 'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities(such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services' (para 98). Finally the framework suggests that 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed' (para 200).

Oxford Local Plan 2036

The Oxford Local Plan 2036 is the current adopted Local Plan. The policy approach to cultural and community facilities is to make accessible a diverse range of facilities; seek to protect existing facilities; and support improvements and more intensive use of existing sites. Section 8 contains strong policies to help realise this strategy:

Policy V7 on infrastructure and cultural and community facilities seeks to improve access to social and community infrastructure in particular from new development and protect and retain existing cultural and community facilities. The policy also indicates that planning permission will be granted for the alteration and expansion of existing schools, primary healthcare facilities and community centres; and that new schools, primary healthcare facilities and communities centres will receive planning permission where the City Council is satisfied that a number of criteria have been met.

Policy G5 on existing open space, indoor and outdoor sports and recreation facilities seeks to protect indoor sport and leisure facilities. The policy also indicates that the City Council will, where the opportunity to do so arises, seek public access to private and institutional facilities (e.g. those owned by colleges and private schools) through sharing schemes and joint user agreements. This is considered further within the Public Open Space and Outdoor Sport topic paper.

Corporate Plan

Oxford City's Council's Strategy 2024-28 was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:

- Good, affordable homes;
- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council

To help support thriving communities the Council Strategy aims to focus on areas of highest inequality to improve health, wellbeing, skills and employment opportunities and equal access for everyone. The priorities are:

- working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities
- Championing diversity and inclusion in our own work and community partnerships
- Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions

The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators. In turn the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford City Council's Thriving Communities Strategy

The Thriving Communities Strategy 2023-2027 brings together leisure, culture, and Oxford City Council's work with communities to tackle inequalities. These inequalities are detailed in Oxfordshire's Joint Strategic Needs Assessment (June 2023) which provides information about the county's population and the factors affecting health, wellbeing, and social care needs. The City Council aims to tackle inequalities by encouraging well-designed neighbourhoods and parks where healthy lifestyles are the norm (sometimes called healthy place shaping), developing skills, ensuring growth is inclusive, strengthening communities and improving access. The strategy is about connectivity and collaboration – ensuring we effectively join up our efforts to help create a more equal city. The strategy sits alongside the Housing,

Homeless and Roughsleeping Strategy, Citizen Experience Strategy, Oxford's Economic Strategy, and the Net Zero Action Plan.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Existing community and leisure facilities

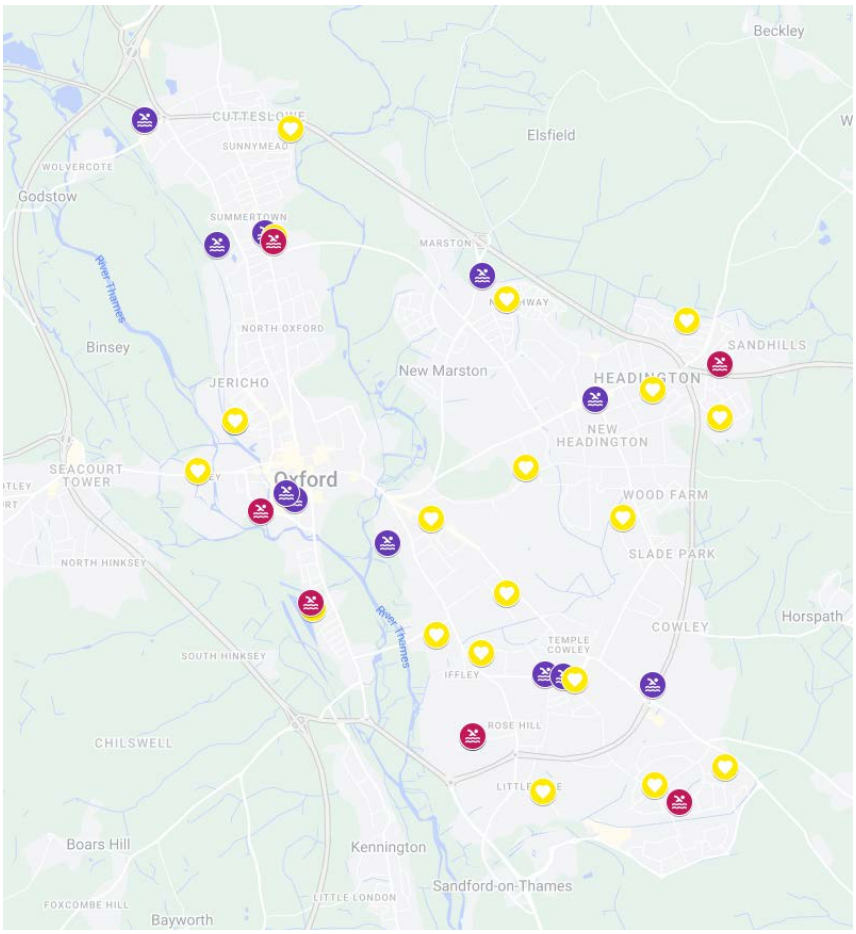

Figure 1. Existing community and leisure facilities (Google, 2024)

City Council leisure centre

Commercial leisure centre

Community centre

Oxford's leisure centres provide a range of indoor sports including swimming pools, gyms, sports halls, crèches, spinning studios, children's soft play, community and group exercise halls and squash courts. A

number of these leisure centres operate on a commercial basis (e.g. provide private membership options). Some leisure centres also provide opportunities for outdoor sports but this is not addressed within this topic paper.

Oxford City Council Leisure Centre Locations:

- Barton Leisure Centre,
- Ferry Leisure Centre,
- Leys Pools and Leisure Centre,
- Rose Hill Community Centre Gym,
- Hinksey Heated Outdoor Pool,
- Oxford Ice Rink

There are 23 community centres located across the city owned by the City Council but managed by Community Associations: Barton Neighbourhood Centre, Blackbird Leys, Bullingdon, Cheney, Cuttleslowe, Donnington, East Oxford, Florence Park, Headington, Jericho St Barnabas, Jubilee 77, Littlemore, North Oxford, Northway Sports Centre, Regal, Risinghurst, Rose Hill, South Oxford, The Asian Cultural Centre, The Venue@Cowley, West Oxford, and Wood Farm Community Room. These community centres offer welfare, educational and recreational activities that residents can get involved in. These can include health and fitness opportunities (e.g. yoga classes), sports (e.g. judo and dance), dedicated groups/sessions for parents and children and the elderly, junior and youth entertainment (e.g. Scouts and Guides) and religious groups. Tenants are granted community leases subject to a number of criteria being met by applicant organisations.

In addition to leisure and community centres there are a number of commercial facilities in the City that overlap with leisure. These include cinemas and theatres, public houses (including social enterprise venues), live music- venues, nightclubs, bowling, karting, laser kombat, private leisure centres/ gyms, children's soft play areas (Partyman), escape rooms, indoor golf and cricket and climbing walls.

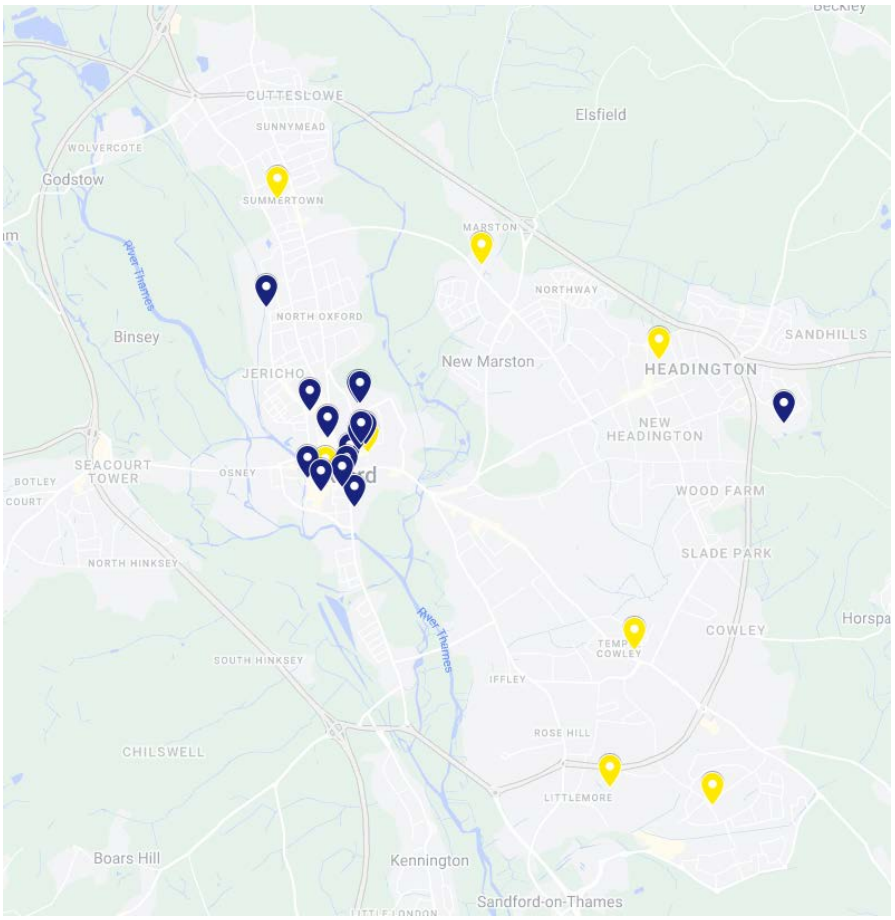

Figure 2: Existing Cultural facilities in Oxford (Google 2024)

Museums and Attractions Libraries

Cultural facilities in the city include 8 libraries (Barton, Blackbird Leys, Cowley, Headington, Littlemore, Old Marston, Oxford Westgate and Summertown), 13 museums and numerous places of worship. Some of these facilities are commercial, e.g. 6 theatres. Oxford City has a rich variety of religious communities. As well as offering dedicated places of worship many of the religious facilities offer opportunity for more general community use in a similar way to community centres e.g. church halls.

There are also a number of leisure and community facilities across the City's schools and universities which are made available for community use through user agreements. There are clearly links between leisure and community facilities and infrastructure: further information can be found in the Infrastructure Topic Paper (015).

Existing Schools and Colleges

Oxford has over 50 primary schools which are well distributed across the city, allowing easy access to local schools. Secondary schools in Oxford are also distributed fairly evenly across the city, meaning they are also easily in reach of where people live. Secondary schools include Cheney School, Greyfriars Catholic School, Matthew Arnold School (just outside the city boundary, in Botley), Oxford Spires Academy, The

Cherwell School, The Oxford Academy, and The Swan School. In addition, there are a number of public schools across the city. The secondary schools vary considerably in terms of their performance. In 2023 (the most recent year performance comparison information is available for) the Cherwell School had an attainment 8 score of 59.2, well above the English state school average of 46.3. At the other end of the scale, The Oxford Academy had an attainment 8 score of 32.6, which is below average.

Existing GP practices

The 2022 Health and Care Act set up new Integrated Care Systems (ICSs) across England, with each ICS having two core parts, an Integrated Care Board (ICB) and an Integrated Care Partnership (ICP). Oxford city is part of the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB). The ICB decides how to spend the NHS budget and plans how to improve people's health, deliver high quality care and get better value for money.

Importance of retail to Oxford's economy

Oxford is a sub-regional centre which provides a wide range of services and facilities to both the city's residents and those living in the sub-regional catchment area. As such it plays an important role in Oxford's economy. The vibrancy and vitality of Oxford's centres needs to be maintained and enhanced in the future to ensure that they can continue to perform their function and continue to make a significant contribution towards the economic, social and environmental objectives for achieving sustainable development. Oxford is a world-class city with a prosperous economy and a historic core that attracts tourists from around the world. The city centre fulfils many functions both regional and local and will continue to be the main focus for retail together with a wide range of leisure and cultural uses.

Recent changes in shopping habits

Retail patterns and behaviours have been changing in recent years with a growth in online shopping, which was only accelerated by the impacts of the Covid-19 pandemic. However, market predictions indicated that there will still be an important role of destination shopping where shopping becomes part of a broader day out linked with eating out and other leisure activities. When online shopping is so easy there must be other draws to encourage people to visit centres.

Footfall and vacancy rates

The continued success of Oxford city centre highly reliant on footfall from tourists, students and office workers, although the impact on spend is not that closely linked to footfall in Oxford, as many of those who usually visit the city centre are not high spenders. For example, students, day tourists and office workers contribute to a lot the footfall in the city centre in normal times, but do not spend very much money. The Authority Monitoring Report 2023/24 shows a city centre footfall comparison of the 2022/23 and the 2023/24 monitoring periods. This comparison shows that for the majority of the year footfall is higher each month during 2023/24 than 2022/23. On average 2023/24 saw more than 100,000 more people per month than in 2023/24. The highest footfall was in August 23, with about 3 million people recorded over that month, surpassing pre-pandemic levels. The vacancy rate of units in the city centre was 5.6% in 2023, compared to an average of 12.5 across the south. This compares to 12.6% in September 2020.

Therefore, there are many signs that change can be managed in a way that is bespoke to the city's needs, and that will maintain a successful and vibrant centre. The flexible policies introduced in the Oxford Local Plan 2036 have enabled us to respond to the changing retail scene in a way that is appropriate to Oxford; for example the conversion of the Boswell's department store to a hotel has maintained an active frontage with a restaurant open to the public on the ground floor.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

It is important that we continue to protect and enhance the City's existing leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use (e.g. housing). This could be detrimental not only to people's health but also their wellbeing. In the absence of a new Local Plan, we would be reliant on the planning policies within the existing Local Plan 2036. Beyond 2036 it would only be national policies that would offer protection and these may not necessarily be detailed or specific enough to protect the diverse range of leisure and community facilities across the city. It seems that demand for retail and service floorspace in key locations such as the city centre and district centres may reduce and change in the future, reflecting the continued growth in online shopping and changes to working practices.

5. Options for Local Plan 2042 policies

The analysis set out in the previous sections of this background paper indicates that the Local Plan 2042 should include several policies to help ensure Oxford remains a vibrant and liveable city. This will not only be important for delivering upon a number of Local Plan 2042 objectives

- Our neighbourhoods will have the facilities we need to support our daily lives within a short walk from our homes, to support a liveable city.
- We will have thriving local centres that support a variety of uses and foster activity throughout the day and night.
- We value diversity whilst fostering greater inclusivity within our communities.
- We support modal shift, to more sustainable/active forms of transport, including by limiting the need to travel, supporting good bicycle parking facilities and reducing on and off-street car parking where possible across the city.

The Local Plan 2042 therefore includes proposed policies in response to three topics:

- Focusing town centre uses in existing centres and maintaining activity at ground floor level in these centres
- Protecting and allowing new community, education and cultural facilities.

For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres

Town centre uses include shops, cafes and restaurants, offices, health centres and gyms, which are uses that attract a lot of people. They therefore need to be located in accessible locations and preferably in a cluster so that a variety of needs can be met in one place, making travel simpler and more likely to be by sustainable modes. The uses also then help to support each other and maintain the strength of community centres, helping them thrive.

The NPPF sets out that there should be a sequential approach to locating new town centre uses based on: centres (city, district and local) first, then edge of centres and only out-of-centre locations where no alternative sites are available. This is to limit the potential for town centre uses to be located in places that may draw people away from established centres, for example to out-of-town retail generally served by car. Town centre uses are defined in the NPPF and include a wide range of uses such as shops, restaurants, gyms, health centres and offices. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres, looking at edge of centre first.

To be able to apply this approach it is necessary to define the centres. Being a compact city, Oxford already has a range of centres that are in easy reach of people across the city. If local centres are defined, these should be considered the same as district centres and the city centre in terms of them being a preferred location for town centre uses. However, the NPPF is very clear that it should not include small parades of shops of purely neighbourhood significance.

In addition to town centre uses there are other uses that are best suited to highly accessible locations and to mixed-use areas. Other policy approaches and the spatial strategy of the plan may also direct particular uses to centres. The policy approach may treat the hubs of the district centres and city centre differently to local centres.

Table XX: Policy options set 013a: Focusing Town Centre Uses in Existing Centres

Option for policy approach	**Potential positive consequences of the approach**	**Potential negative/neutral consequences of the approach**
Option a Allow and protect town centre uses in the city centre, and district centres first. .	This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, and helps ensure that facilities are focused in these locations that can be easily reached by sustainable modes. The concentration of uses also means various needs can be fulfilled in one trip, encouraging people to stay longer. This approach helps to ensure town centre uses are concentrated in existing centres, where there are already good transport facilities (and other facilities such as public toilets, as well as parking for those who need to use it).	The wide range of uses allowed in district centres could lead to competing demands or a particular use could become dominant, which may not be that which is most needed by the community (for example student accommodation or hotels). The policy options relating to active frontages, below, will be important in mitigating this. Use Class E covers a wide variety of facilities, and it includes healthcare such as GPs. This approach would mean new GP surgeries would be expected to be located in district centres and would need to work through a sequential test to show other options are not feasible, which may limit options for locating GPs. However, it is important that GPs are easily accessible, so this approach is justified.
Option b As well as larger district centres, also define local centres.	Local centres are significantly smaller than the district centres, with less variety of	These local centres vary in character. Defining them as centres means that

	uses, but they should be supported as they provide facilities locally in enough variety to serve a range of needs and they help ensure local access. These locations are less likely to be transport hubs and are more tightly woven into residential areas, so may need a slightly different policy approach to district centres.	restaurants and gyms could be introduced into quieter areas and they may attract more people than can easily access the centres.
Option c Apart from for town centre uses, distinguish between city and district centres and local centres in terms of the other types of uses permitted. For example, do not allow student accommodation in local centres, but in larger centres only (if local centres are defined, according to the NPPF they are 'town centres' and so suitable for all main town centre uses).	This ensures that the uses that are most likely to be unsuitable for smaller centres are concentrated only in larger centres, minimising disruption and negative impacts, whilst still encouraging town centre uses in smaller centres to maintain good access to facilities and services.	This limits sites available for sui generis uses, which might still be popular locally.
Option d Do not distinguish between centres at all and allow the same uses in any defined centre.	This increases the range of uses that would be accepted in local centres and increases the locations where needs for student accommodation, hotels and visitor and cultural venues could be met.	Local centres are small and not as suitable for hotel uses, visitor attractions and student accommodation. They generally don't have such strong accessibility, and uses that attract a lot of people at once and are less compatible with quiet residential areas could create negative impacts.
Option e Require an impact assessment for retail and leisure proposals outside of centres of a smaller threshold than the default 2,500m2 in the NPPF (currently required in OLP2036 for those of 350m2 or more), demonstrating that there will be no adverse impact on the	In the context of Oxford, a proposal of 2,500m2 is large, and much smaller proposals outside of centres could potentially have negative impacts. This approach would pick up a larger number of proposals, ensuring negative impacts are avoided or mitigated.	This approach involves an oversight of a larger number of retail and leisure proposals.

vitality and viability of the existing centres, and that there is good accessibility by walking, cycling and public transport, and potentially including other criteria such as that there would not be unacceptable harm to adjoining land uses.		
Option f Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.	The NPPF sets out this approach, so there may be no need to repeat it in local policy.	The NPPF references accessibility and connectivity to centres as criteria for assessing proposals but there are no other locally specific criteria. The Local Plan gives the opportunity to define centres and expectations for them.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a with b, c with a&b, d with a&b, e with a/a&b/a&b&c, f **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** The NPPF directs town centre uses to town centres. The local plan can define these areas where town centre uses are to be directed. Town centres may or may not include local centres. There are uses that are not town centre uses that may be most suited to accessible locations. The options explore various ways of defining centres and suitable uses. The options relate primarily to criterion 6. Essential facilities, and criterion 12. Economic growth. Also, they are supporting of the air quality/transport criterion, because protecting centres/guiding uses to these areas helps to support a public transport network and helps people access their needs in sustainable ways. There are slightly different approaches within the options, but largely they all represent minor positives, apart from option for no policy which will be neutral.

Policy options set 013b (Draft Policy C2): Maintaining vibrant centres

As well as considering what types of uses should be permitted in what types of centres, it is necessary to consider how to protect those existing centres so that they remain vibrant and sustain people's local access to facilities and services.

Table XX: Policy options set 013b: Maintaining vibrant centres

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Designate frontages in the city centre and all district and local centres and require that a high proportion of this remains as Use Class E on the ground floor. The proportion to be set based on maintaining current thresholds, with some leeway for flexibility.	Having 'active' uses at the ground floor helps maintain the vibrancy of centres. Commercial, business and services are uses that attract a lot of people, so these are most beneficially located in the centres, where there are good transport connections, and where there is the benefit of people accessing a variety of facilities at the same time. There would still be a lot of flexibility with this approach to have other uses such as housing on the upper floors.	Permitted development rights that allow a change from Use Class E to housing could mean that the policy threshold is breached without any planning permissions being granted, and that would remove any flexibility for the remaining frontage, and limits the potential of the policy to maintain an active frontage. This will need a strong definition of an active frontage.
Option b Designate frontages in the city centre and all district and local centres but do not require a proportion to remain as commercial, business and services uses - only set criteria for what is expected in a ground floor frontage to bring activity and vibrancy to centres in terms of design and uses.	This approach allows complete flexibility, in the spirit of the change to the Use Class Order. It has flexibility to be applicable whatever future changes to the Use Class Order may occur. Criteria can help to ensure that shop fronts contribute to the design and character of existing buildings and their surroundings and give protection to Oxford's historic shopfronts.	Because the locations where many commercial uses can be located will be so limited, it is important to try to protect them where they are most suitable. Without this protection, there could be a weakening of district centres and the city centre as places where people can access a broad range of facilities at once, and easily, by walking, cycling and public transport.
Option c Do not designate active frontages.	Checking the proportion of active frontages, or assessing whether a proposal maintains an active frontage, does take some time, which would be avoided with this approach.	This approach does nothing to protect the vitality of local centres, so would not help to achieve the aim of a 15-minute city.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b or c, or a with elements of b **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No

Rationale: Key criteria are **6. Services** and **12. Economic growth** (keeping high streets alive), potentially indirect impacts on 11. Urban design. Option a and b are both likely to have a minor positive for criterion 6 and criterion 12 because it would support protecting thriving centres (local and district) and maintaining a vibrant street atmosphere. Option b potentially also might have a minor positive impact against 11. Urban Design because incorporating criteria could include considerations about design of shop fronts and reflecting local character. Option c (no local policy) means no protection and would be scored as a neutral impact (it would not actively make the frontages disappear, just means no further protection through local policy). Overall, these are not scoped in for detailed appraisal because impacts are unlikley to be significant.

Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table XX: Policy options set 013c: Protection and Alteration of Existing Local Community facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect local shared spaces and community assets with a policy that would resist their loss, unless set criteria can be met, for example they are to be replaced.	This approach recognises the importance of local community assets and shared spaces and that these make a valued contribution to the health and wellbeing of local residents. The starting position is that these should be protected from loss. The approach recognises that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate market-led research and	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need or overriding demand. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.

	evidence to be provided to underline this case. Promoting 15-minute city concepts is a key aspiration for the Local Plan, defining accessibility in these terms will help to ensure that any re-provision does not force people to use less sustainable modes of transport to continue to use the facility (e.g. car).	
Option b Include a policy where planning will be granted for alteration and expansion of existing local community assets with relevant evidence from market research, although potentially preventing F2 shops from expanding so they become Use Class E and could be lost to housing or other commercial uses.	This would recognise the particular importance of community assets to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service.	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.
Option c Do not have a policy protecting local community assets - rely on national policy, or future national development management policies.	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places which 'enable and support healthy lifestyles' and 'promote social interaction'. It is likely that new national development management policies could set out a framework for when loss of	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

	facilities is acceptable and may make a local policy redundant.	

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts **Screened in for detailed appraisal? -** No **Rationale:** With the absence of a specific national policy, it would be appropriate to consider having a policy. The local context supports the inclusion of such a policy, with several potential approaches for its formulation. The options under consideration by the Council explore different strategies for protecting and modifying existing community facilities. These approaches aim to safeguard these facilities, ensuring they are preserved unless it can be demonstrated that they are no longer needed or that a suitable replacement exists. In terms of sustainability impacts, the different options all score against **criterion 5. inequalities** and **criterion 6. services and facilities** and the level of sustainability impact is unlikely to vary significantly between the options. Option a would have a neutral impact as it offers a cohesive approach to protecting existing local community facilities and outlines a strict criteria which needs to be met in order for the loss of a facility. However, there is still a chance that a community facility could be lost which poses social inequality and health threats, outlined in criterion 5, as communities won't have easily accessible facilities to socialise and exercise. Option b offers a minor positive impact as there is opportunity to expand and alter existing facilities without the risk of development becoming all Class E, preventing the loss of community facilities to housing and commercial use. This also limits the likelihood of social and health inequalities occurring. Option c would have a neutral impact as it would rely on national policy. Although there is no direct national policy, the NPPF does promote healthy and safe communities - it just doesn't outline how to achieve this. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table XX: Policy options set 013d: Provision of New Local Community Facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Generally, support the provision of new local community assets in the city. These should be in an accessible location by walking, cycling and public transport.	These facilities can form an important part of the social fabric of an area, and can support positive health and wellbeing both physical and mental. In combination with option A of Protection and Alteration options above, which seeks to protect existing space, this option would support new facilities coming forward where these would make a positive contribution to the city. Promoting active travel through walking/cycling as part of an accessible city is a key aspiration in the Local Plan.	Whilst this option would support provision, it would not define exactly what is needed and where. Community assets would not always automatically be approved, which would be because they were not suitable, but which may limit opportunities.
Option b Seek to secure community use agreements on all new community and leisure facilities, particularly those within schools and colleges, as well as existing facilities that come forward for redevelopment.	There are a range of private sports facilities in the city which offer limited public use as well as those that are entirely restricted to members of those institutions, including schools and colleges. Where access is opened up to the wider community, this could help improve the range of access to facilities.	Management and operational requirements of certain private facilities, such as those belonging to schools and colleges may restrict wider access for safety/ security reasons. It is likely that community use agreements would need to be explored on a case-by-case basis.
Option c		

Do not have a policy addressing provision of new local community assets; rely on national policy, or future national development management policies.	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? -
High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? - No

Rationale: In terms of options, it would be appropriate to consider having a policy as there is no specific national policy or guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy for the provision of new local community facilities.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it allows new facilities to come forward. Option b would also have a slight positive impact as it would ensure public access to new or existing and expanded facilities. Option c would have a neutral impact as it would rely on national policy. There is no direct national policy, but it does promote healthy and safe communities Whilst option a represents a cohesive policy approach, some of the options (options b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could be stand alone, it could also be incorporated alongside option b as this would be less likely to stand alone and option c is less likely to be incorporated at all. There is also a sustainability impact link to **criterion 5. inequalities** as option a is trying to encourage new facilities to come forward and option b is looking at opening up access to previously private facilities to the wider community. This can facilitate social inclusion and access to recreational facilities which in turn links to good health. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table XX: Policy options set 013e: Protection and Alteration of Learning and Non-residential Institutions (including Schools, Libraries and Places of Worship)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect existing learning and non-residential institutions with a policy that would resist their loss, unless justified by meeting a set of criteria such as that there is no longer a need or it is no longer feasible in that location, and/or that suitable re-provision can be made.	This approach recognises the importance of learning and other non-residential institutions. These make a valued contribution to the health and wellbeing of local residents and also are important in learning and skills development, potentially helping overcome inequalities. The starting position is that these should be protected from loss, but this approach is flexible, recognising that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate evidence to be provided to underline this case.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Set out that permission will be granted for alteration and expansion of existing learning and non-residential institutions.	This would recognise the particular importance of learning and non-residential institutions to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.

	provide a better level of service.	
Option c Do not have a policy protecting learning and non-residential institutions- rely on national policy, or future national development management policies.	The NPPF does provide support for the provision and use of community facilities (such as public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. It identifies that planning policies should guard against the unnecessary loss or valued services and facilities, particularly where this would reduce the communities ability to meet its day-to-day needs. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b, a and b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -**No **Rationale:** The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for educational infrastructure (paragraph 20). Previous vidence suggests that it is likely that need over the plan period can be met on existing sites, but it will be important that sites ae protected. The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. The level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it protects existing uses in most cases. Option b would also have a slight positive impact as it would expansion of existing facilities. Option c could have a negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

Policy options set 013f (proposed policy C4): Provision of New Learning and Non-Residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table XX: Policy options set 013f: Provision of New Learning and Non-Residential Institutions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include criteria for assessing the suitability of proposals for learning and non-residential institutions such as schools, with criteria for assessing the suitability of unallocated sites that may be proposed for these uses, which will include issues such as likely impacts on amenity and traffic and whether they can be mitigated, including access, accessibility, size of site and neighbouring uses.	Whilst these uses will always bring benefits to the community, there is potential for them to be sited in unsuitable locations, where traffic is generated, where there are problems with access or it causes disruption to local residents; this approach would prevent that happening.	This could prevent much needed uses coming forward if the site is assessed as not suitable.
Option b Restrict the locations where these uses would be allowed, for example to defined centres only, or to arterial roads and centres.	Some broad location types will, by their nature, be more likely to be suited to this kind of use, and this policy approach is upfront about those, reducing the need to assess against broad critiera.	This may rule out sites which would be very suitable for these beneficial uses.
Option c Do not have a policy for provision of new learning and non-residential institutions.	These uses bring benefits for the community, and this approach maximises the flexibility for them to be brought forward, in any location (suitable as long as other policy requirements are met).	This could lead to proposals in unsuitable locations, which generate traffic, have access issues, which are not close to other facilities for linked trips and which are not as easily accessible.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b, a and b, or c **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts. **Screened in for detailed appraisal? -**No **Rationale:** The NPPF says that a positive approach should be taken to meeting communities' needs in terms of education and development that will widen choice in education. However, it is also the case that not all locations are likely to be suitable for this type of development. Options are therefore set out that explore potential policy approaches to new learning and non-residential institutions, that supports them to varying degrees and that also ensures they are in appropriate locations. The options that the Council have considered represent various approaches to setting policy for the provision of new learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inequalities.** The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option c, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Provision of the facilities depends on them coming forward, so all options have a neutral to mildly positive impact.

Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions

Most cultural venues and visitor attractions such as theatres, nightclubs, pubs, casinos and concert halls are classed in the planning system as 'Sui Generis', which means use cannot switch to or from them without planning permission and proposals can all be considered on their own merits. These attractions can be important to people's experience and enjoyment of the city, both for visitors and residents, which may warrant their protection, with varying needs of flexibility as it will be necessary to respond to changing interests and demand.

Table XX: Policy options set 013g: Protecting Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a		

Protect cultural, social and visitor attractions in their current use, and include a criteria-based policy that only allows their loss or change to another attraction or community use if justified against a clear set of criteria that includes requirements for viability and marketing evidence, or replacement.	This approach would help guard against the loss of valued social, recreational and cultural facilities. It would help ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. It is important that evening economy uses can flourish and co-exist with other uses especially where they are found near one another.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Protect cultural, social and visitor attractions for those uses (but not necessary the exact use they are in, for example a cinema could be lost to a pub, or even loss to a community facility could be set out as acceptable in principle). This approach would still include a criteria-based policy that only allows their loss if justified against these.	This approach continues to protect facilities that may be important to people in the local area, or wider area, whilst allowing greater flexibility to respond to changing tastes and demand, for example if visitor numbers to cinemas has fallen so much as to affect their viability, a currently more popular use would be allowed in principle (subject to other policies and criteria being met).	This would mean that facilities such as pubs, which can be very important to local communities, could potentially change to an attraction that may attract more visitors, but which does not perform the same community function. Facilities such as pubs are often not in centres, so their change to another use, which is essentially a new use, could conflict with policies that try to direct these uses that attract lots of people to the defined centres.
Option c Do not include a policy that protects existing venues.	This approach leaves the market to respond flexibly to demands and market conditions.	This approach would not help guard against the loss of valued facilities and venues.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a and b or c **High-level screening conclusion? -** the options are similar to each other and are unlikely significant sustainability impacts.

Screened in for detailed appraisal? - No

Rationale:
The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for cultural infrastructure (paragraph 20). The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing cultural, social and visitor attractions.

These options most directly relate to criterion **12. Economic growth,** particularly the element that relates to cultural provision and tourism and to **criterion 6. to provide accessible essential services and facilities** and **criterion 5 to reduce poverty, social exclusion and health inequalities**. Having a policy has a minor positive impact, helping to ensure these facilities are protected for the benefits they provide in terms of jobs, attracting visitors to the city and contributing to social and cultural well-being . Option c could have a minor negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions

CONCISE INTRO TEXT

Table XX: Policy options set 013h: Provision of New Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses. This may specifically encourage some Sui Generis uses that are considered will fill gaps in provision or be particularly beneficial.	Potential benefits include prevention of impacts such as congestion and providing economic opportunities from locating new uses in accessible and sustainable locations.	The design of new facilities would need to be carefully considered otherwise there could be a potential for conflict with Oxford's historic assets, which has the potential to undermine the city's historic character. Allows for possibility of locating tourist assets away from existing transport hubs.
Option b	This approach would continue to encourage new facilities in	Potentially increases pressure in these centres as so many

Allow new cultural, social and visitor attractions in defined centres only.	the most sustainable and accessible locations. In these locations, they also have potential to attract people who will use the other existing facilities of these centres and help to support them. This gives further potential to enhance the vibrancy of the city and district centres.	uses would only be allowed there. That may also limit these facilities because of competition for a limited number of sites. Has the potential to reduce variety of uses in these locations.
Option c Do not allow new cultural, social or visitor attractions	This could limit the negative impacts of visitors and tourists on Oxford's transport system and communities.	This approach would have a potential negative impact to Oxford's tourism industry and economy. It may not limit visitors, but would just limit their experience. It was also limit opportunities for residents. It could contribute to a decline of the city centre and district centres, with fewer visitors. It would limit opportunities for new attractions that may contribute to the wider understanding and appreciation of Oxford's unique history or increase its accessibility to people and opportunities for enjoyment.
Option d No Policy. Rely on other policies in the Local Plan and national policies where applicable.	Provides flexibility for the provision of these uses.	Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, a & b, b, c, d **High-level screening conclusion? -** the options are similar to each other and are unlikely to have significant sustainability impacts.

Screened in for detailed appraisal? -No

Rationale: The NPPF says that plans should take into account and support the delivery of local strategies to improve society and cultural well-being. Therefore it is appropriate for options to explore potential policy approaches to support these facilities to varying degrees and that also ensures they are in appropriate locations. Visitor attractions and cultural facilities can attract large numbers of people and therefore have impacts on local amenity, and it is important they are accessible. The options that the Council have considered represent various approaches to setting policy for the provision of new cultural, social and visitor attractions.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inqualities and 12. Economic growth,** particularly the element that relates to cultural provision and tourism**.** The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option d, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Option c allows no new facilities, but would not affect directly existing facilities, which already ensure a range of provision.

6. Conclusions including preferred approaches for Local Plan 2042

The importance of adequate availability of community and cultural facilities is evident. The functions they provide can be as a meeting place, a place for leisure and fitness, a place for community and interest groups to meet and so on. Cultural community and leisure facilities help to support strong communities, healthy lifestyles, wellbeing, and a sense of community and belonging. There has been a change in the cultural and leisure landscape as a result of Covid-19, which has in some ways perhaps just accelerated changes. The Local Plan 2042 should take a flexible approach that enables the types of facilities needed and that protects or ensures provision. This will help achieve health and wellbeing objectives and help to overcome inequalities.

The retail and service sector play an important role in Oxford's economy and help to offer a range of job opportunities to local people. The city centre is an important destination for visitors from both overseas and the UK, and is attractive for business trips and conferences. The city centre and district centres provide a diverse range of uses and services, including retail, pubs, restaurants, offices, together with cultural and entertainment venues, which are important to the functioning of a city and people's well-being. These help to meet the needs of local residents, visitors to the city and those working in Oxford. Opportunities for new cultural, community and entertainment uses together with those in the hospitality sector and residential where appropriate could potentially be at the forefront of a renaissance in the city's retail sector.

Key sustainability issues for the Local Plan to address in relation to liveable cities

- Availability of services and facilities plays a key role in quality of life. The pandemic highlighted the value that people put on facilities in their local areas
- The impacts of permitted development allowed between town centre uses and housing will need to be monitored to see whether it is affecting provision of community and cultural facilities.
- With pressure for housing, it will be important to make a case for the importance of the facilities that support this housing.
- Many commercial facilities suffered during the pandemic and have been affected by rising living and energy costs post the pandemic. Changes may be required to the way services and facilities are operated and delivered. Combined and flexible facilities will be important to help maximise usage and respond to changing demands.
- The city must offer a diverse range of uses services.

6.1. Preferred approaches for the Local Plan 2042

Section 5 identified that there were a number of topics that the Local Plan 2042 could implement policy to address which relate to liveable cities. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Focusing Town Centre Uses in Existing Centres – Proposed policy C1

The preferred approach for the Local Plan 2042 is to include a policy that defines the city centre, district centres and local centres. These centres should be the focus for new main town centre uses. There preferred approach is to distinguish between the larger centres and the local centres particularly in terms of student accommodation, which would not be considered suitable in the local centres.

The preferred approach is therefore a combination of **options A, B, C and E.**

Active Frontages – Proposed policy C2

The preferred approach for this topic is to include a policy that sets thresholds for the proportion of Use Class E (commercial use) to remain at ground floor level, and also to set criteria to ensure an active frontage. Ensuring a level of activity at street level is vital for the continued success of the centres, as is trying to maintain a range of commercial activity.

The preferred approach is therefore **Option A,** with elements of **Option B.**

Protection, alteration and new local community facilities – Proposed policy C3

NEED TO REFERENCE THE DETAILED SA APPRAISAL FOR THIS OPTION SET

The preferred approach for policy addressing community facilities is to generally support new facilities in accessible locations, encouraging community use of facilities if they are private. The preferred approach is also to protect existing facilities unless strict criteria are met, and to allow alteration and explansion of existing facilities. This approach recognises the importance of these facilities to local communities.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013d and A and B of option set 013c.**

Protection, alteration and new learning and non-residential institutions – Proposed policy C4

The preferred approach for policy addressing learning an non-residential institutions is to generally support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities unless, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013e and A of option set 013f.**

Protection, alteration and new learning and non-residential institutions – Proposed policy C5

The preferred approach for policy addressing protection, alteration and provision of cultural venues and visitor attractions is to support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities as cultural and visitor attractions (allowing flexibility amongst these types of uses) unless criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

The preferred approach in the draft Local Plan is therefore a combination of **option A of option set 013g and A and B of option set 013h.**

Background paper 014

Grey and Digital Infrastructure

This paper addresses: The provision of grey infrastructure (including roads, rail, sewers and energy) and digital infrastructure (including telecoms and broadband) to meet the community's needs and support the growth of the city.	
SA Objective(s):	1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040. 6. To provide accessible essential **services and facilities**. 8. To reduce **traffic congestion and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve **water** quality targets and manage water resources.
SEA theme(s): Water, climatic factors, material assets, human health, landscape, population and air.	

1. Introduction 2

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal) 2

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal) 5

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal) 12

5. Options for Local Plan 2042 policy 13

Policy Option set 014a (draft Policy S3): Infrastructure Delivery in New Development .. 14

Policy Options Set 014b (draft Policy xx): Digital Infrastructure to support New Development 16

6. Conclusions including key sustainability issues 18

6.1. Preferred approaches for the Local Plan 2042 18

1. Introduction

Infrastructure generally consists of facilities and services that meet the needs of the local population and help support development and growth.

Infrastructure is often broken down into broad sub-groups. These sub-groups are usually made up of following infrastructure categories:

- Physical infrastructure (such as transport, utilities infrastructure);
- Social infrastructure (such as schools, healthcare and community centres);
- Green and blue infrastructure (such as parks, waterways and cemeteries) and
- Digital infrastructure (such as high-speed internet, mobile telecoms and smart grid energy)

Infrastructure needs can arise from deficiencies in current provision; additional requirements to support new development; or as the result of increased demand due to population growth. This topic paper focuses on physical and digital infrastructure. It sets out an overview of the policy context relating to transport infrastructure provision. However, a more detailed discussion on transport infrastructure can be found in Topic Paper 12 – Transport. A discussion about social infrastructure can be found in the Topic Paper 14 - Liveable city and a discussion on green and blue Infrastructure is covered in Topic Paper 6 – Green Infrastructure and biodiversity.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

Infrastructure provision and delivery to support new development has become increasingly recognised as an important national planning priority in recent years. The most recent NPPF (December 2024), acknowledges the importance of new, upgraded, and/ or expanded infrastructure that is required to support the developmental aims and ambitions of the Labour administration.

Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk, and provision of minerals and energy; and community facilities (such as health, education and cultural infrastructure).

Paragraph 35 of the NPPF sets out that Plans should set out the contributions expected from development and that this should set out the levels and types of infrastructure required providing such policies do not undermine the viability of the plan. Both physical and digital infrastructure (both of which are relevant to this topic paper) are included.

Paragraph 77 off the NPPF sets out that the supply of large numbers of new homes should be "supported by the necessary infrastructure and facilities". While Chapter 6 of the NPPF sets out the Government's approach to the supporting economic growth through the planning system. The NPPF now includes digital infrastructure as one of the Government's five named key sectors supported by the NPPF to "meet the needs of a modern economy". It also sets out that planning policies should make provision for "new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries". While Paragraph 86 sets out the importance of delivering infrastructure and associated improvements, where it is recognised that identified inadequacies are a potential barrier to investment.

Chapter 10 of the NPPF recognises the importance of digital infrastructure and sets out that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also stresses the importance of plans supporting the expansion of next generation mobile technology and sets out that full fibre connections should be prioritised to existing and new developments.

Planning Practice Guidance (PPG)

The Planning Practice Guidance section on Plan-making refers to infrastructure within several different contexts. A selection of these are set out below:

- The potential need for additional cross-boundary infrastructure;
- Understanding if there are barriers to investment (e.g., lack of housing, infrastructure, etc.);
- In working out developer contributions, a proportionate evidence base should include a plan-level viability assessment;
- Providing confidence that new homes will be supported by appropriate infrastructure in a timely manner and providing policy support for identified deficiencies.

- To be able to demonstrate that any critical infrastructure required to support the level of growth proposed in the plan is deliverable within a reasonable timeframe;
- To use the Infrastructure Funding Statement to support infrastructure delivery throughout the plan period.

Oxford Cambridge Growth Corridor

In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire Local Transport and Connectivity Plan (LTCP)

The LTCP5 was published in July 2022 and follows on from the previous Local Transport Plan 2015-2031 (LTP4). The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there.

The LTCP is supported by a number of supporting strategies. The objectives of these strategies are to reduce the need to travel, reduce reliance on individual private car use and to promote alternative modes of transport such as walking, cycling and public/ shared transport as natural first choices.

There is a strong emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

Local Cycling and Walking Investment Plan (LCWIP)

Local Cycling and Walking Investment Plans (LCWIPs) are being prepared for several parts of Oxfordshire. The Oxford City LCWIP was adopted by Oxfordshire County Council in March 2020. The plan sets out evidence in relation to achieving a 50% increase in cycling in Oxford. The City LCWIP:

- Lays out a comprehensive cycle network to focus expenditure for best value;

- Identifies a list of infrastructure improvements for both walking and cycling based on best practice and the Cycle and Walking Design Guides;
- Summarises the evidence for supportive measures, such as Low Traffic Neighbourhoods and controlled parking zones; and
- Provides cost estimates for these schemes that can be used in future bids and in planning decisions.

Local Area Energy Plans for Oxfordshire

In February 2025 an announcement was made that all the Oxfordshire authorities including all district councils and the county council (supported by the Oxfordshire Leaders Joint Committee) are to deliver a Local Area Energy Plan (LEAP) for the county. This will help address climate change and provide recommendations for the development and improvement of energy-related policies, regulations and incentives including securing cleaner, more affordable energy. The LAEP will be developed throughout 2025.

Oxford Local Plan 2036 (Infrastructure Policies)

The Oxford Local Plan 2036 contains several policies relating to infrastructure. These policies help support new development by ensuring that appropriate infrastructure is provided in a timely manner. For instance, Policy V8 – Utilities, requires planning applications to be supported by information that capacity issues have been explored with the appropriate utilities providers and sets out that development will not be supported without sufficient evidence regarding utilities capacity. Whereas Policy V9 – Digital Infrastructure, supports development that delivers full-fibre broadband connection speeds and appropriate electronic communications infrastructure provided that a set of criteria are met.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Infrastructure investment usually either comes directly from new development in the form of developer contributions or direct delivery, or indirectly, through the attraction of central and local government funds associated with new development. Through Local Growth Funds 1 and 2, the Oxfordshire Local Enterprise Partnership (LEP) secured £118.4m to

support dynamic economic growth funding numerous infrastructure projects. They were also awarded £24.16m, as part of Local Growth Fund 3, enabling the support more projects to benefit local people and business.

Infrastructure needs can change over time, for instance, as changes in demographics occur, or new technologies emerge, investment in infrastructure does not always keep up with the pace of development, especially in areas where the cumulative effects of smaller developments are felt more acutely, such as in Oxford. When this happens, a deficit is created which can impact on the existing and future population.

Figure 1 shows the development pressure arising from the planned growth set out in the Local Plan 2036. This area-based analysis divided the city into four broad sectors, each of which has planned housing growth of more than 1,000 units. Development pressure also exists adjacent to the boundary of the city with new around 4,800 new homes planned adjacent to the city's South Infrastructure Area. In addition, there are more than 1,100 homes proposed outside the East Infrastructure Area. A similar number of new homes are also planned (around 1,400) adjacent to the Oxford's North Infrastructure Area. Although these developments are outside the city there is the potential for them to put pressure on existing infrastructure facilities and services in the city.

Figure 1 also shows the locations of the city's Category 1 employment sites. This shows that there is a cluster of existing employment sites located in the south of the city, which is presently not well-served by public transport. Important infrastructure projects such as the redevelopment of Oxford Station and the re-introduction of passengers on the Cowley Branch Line will improve the connectivity and accessibility of these, and other employment sites in the south of the city across the county and the wider growth corridor.

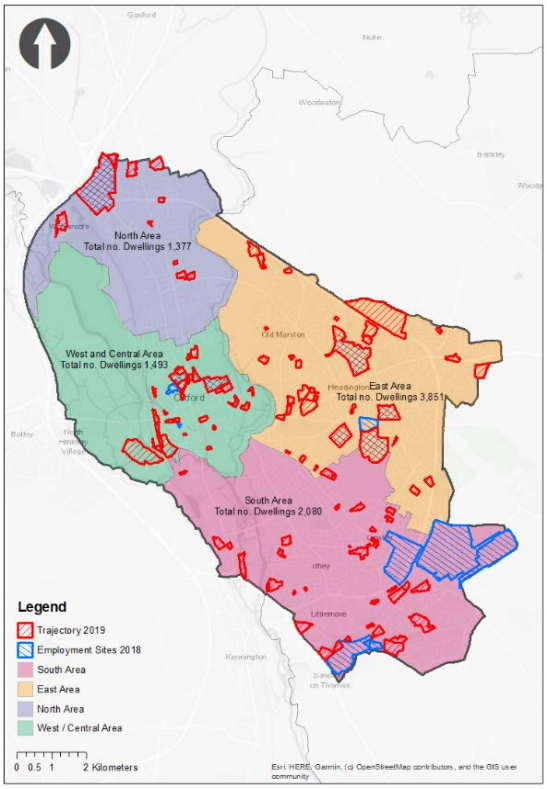

Figure 1: Area-based analysis of the Local Plan 2016-2036 requirements for ca. 11,000 new homes and 25ha of new employment land in Oxford. This map only shows Category 1 employment sites (LP2036)

How is infrastructure funded?

Currently in Oxford, Section 106 (S106) agreements and the Community Infrastructure Levy (CIL) are the main mechanisms in place for generating funds from development to be invested in infrastructure to help mitigate the impacts of development. S106 agreements can set out legal obligations for on-site infrastructure needs, are often on major sites and can include affordable housing contributions. CIL is a charge levied on the new floor space of new developments and is accumulated from developments across the city to be reinvested into infrastructure needs of the city.

The City's Infrastructure Funding Statement (IFS) summarises the amount of developer contributions obtained, allocated and spent in the previous financial year. CIL receipts for the 2023/24 monitoring year were just over £5.67 million and S106 contributions in 2023/24 were just over £190,000. The S106 money received was put towards a variety of contributions including affordable housing, highways management, air quality monitoring, and community facilities. Non-financial S106 contributions included public open space, affordable housing and footpath links.

Oxfordshire County Council's Infrastructure Funding Statement (IFS) is also available online and identifies income and expenditure for education, highways and public transport, fire service, libraries and other county responsibilities.

Analysis of current infrastructure provision

Utilities: Water resources

Thames Water has a duty to maintain the security of the water supply, and every five years they 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. The latest version WRMP24 published in October 2024 looks ahead to 2075.

Utilities: Wastewater treatment

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 Sewage Treatment Works (STW), located just outside the city boundary to the south of the city, and Littlemore Pumping Station.

The Oxford STW is one of the most important structural assets with respect to future development in Oxford. In the past, it has benefitted from some increases in capacity. However, recently further upgrades to the Oxford STW facility have been shown to be needed. These upgrades are to ensure that the Oxford STW is able to both meet current and future demand for growth in the city and the surrounding area.

Thames Water, the Environment Agency and Oxford City Council met several times in 2024 to discuss the progress of the upgrades required to improve treatment capacity at the Oxford STW. The purpose of these meetings was to provide confidence and evidence that the planned and proposed growth in the surrounding area can be realised in full (and any wastewater arising from it could be satisfactorily dealt with at the Oxford STW). Thames Water has kept Oxford City Council updated and involved in its capacity upgrade discussions. On 20 March 2025, following a rigorous process to find a solution to unlock new homes, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford STW. Thames Water has presented a clear, fully costed and funded programme of work that provides the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward.

The City Council has commissioned a new Water Cycle Study to accompany the preparation of the Local Plan 2042 which will analyse the current situation in the water environment, The Water Cycle Study looks at how the likely development proposed through the new Local Plan could potentially impact the water environment.

Utilities: Energy

Scottish Southern Electricity Networks (SSE) is responsible for delivering electricity distribution across southern England, including Oxford. Throughout the development of the Local Plan 2036 the Council liaised with SSE in relation to the likely impacts of proposed development allocations in the plan on their networks; and to ensure that any upgrades to the network that may be required to serve the proposed levels of development will be provided in a timely manner. Continuing these conversations to support the production of the Local Plan 2042 are an important part of infrastructure planning especially as more details are known about the quantum and distribution of development.

Oxford has set out ambitious objectives in relation to cutting carbon emissions and moving towards being a net zero city by 2040. Renewable energy generation technology is likely to play an important role in this endeavour and there is a variety of renewable energy infrastructure schemes around the city.

The online platform 'The Peoples Power Station' which was developed by the Low Carbon Hub maps a variety of renewable energy and energy efficiency projects across Oxfordshire and a snapshot of the distribution for Oxford is included in Figure 2, which shows that most installed schemes in the city involve small-scale solar photovoltaics. This reflects the constrained nature of Oxford, and the relatively high density of the existing built-up area means that there are limited opportunities for some larger-scale renewable energy projects (e.g., solar farms). However, the city's higher densities also present opportunities for certain renewable energy projects (e.g., district heating), which need numerous potential users within close proximity to one another.

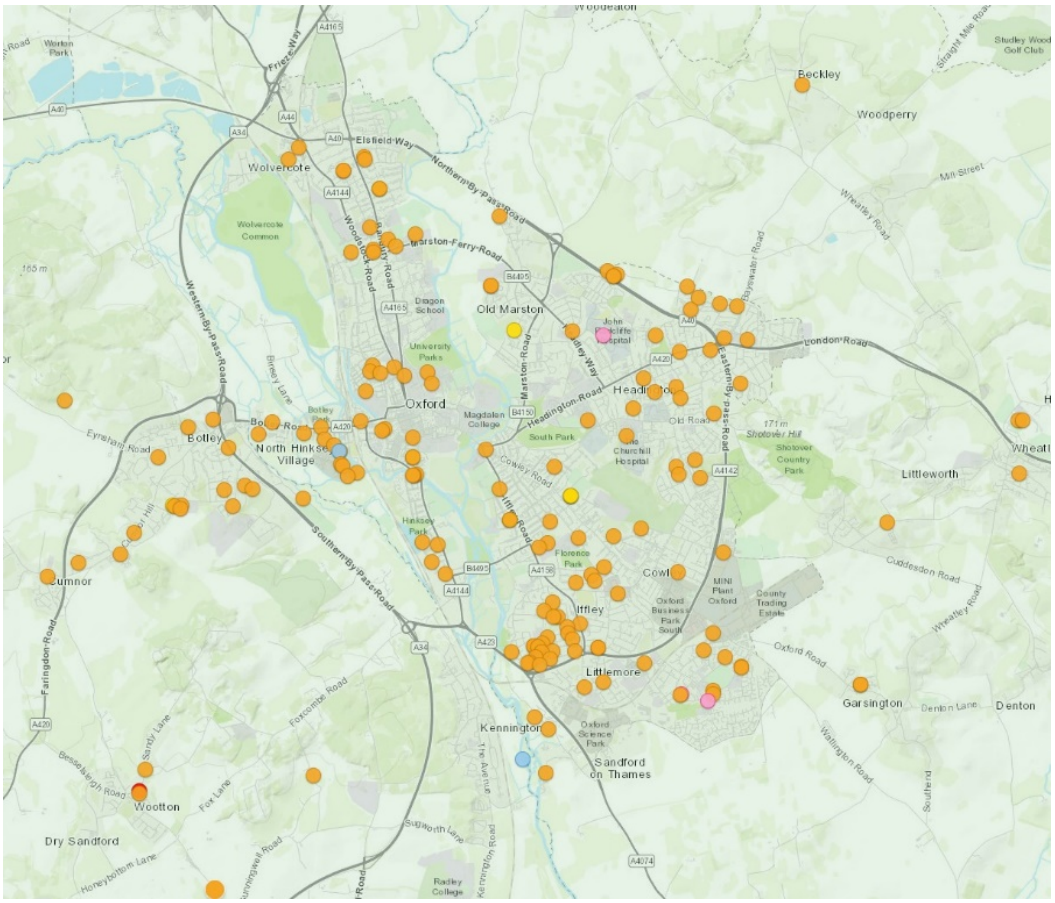

Figure 2: Renewable energy generation schemes in and around Oxford. Orange markers indicate solar photovoltaics, yellow is solar thermal, pink is combined heat and power, and blue is hydro. Source: People's Power Station (accessed 13 January 2025)

Renewable and low-carbon energy technologies are currently secured in new developments to comply with the policy requirements of the Local Plan 2036. As such they are usually negotiated through commitments secured through the development management process and are therefore generally funded and provided by developers.

As well as electricity, gas supply is often regarded as an essential utility provision in 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 Scotia Gas Network (SGN).

As part of the development of the Local Plan 2036, SGN assessed all identified sites to identify if there would be any likely issues with the gas network. The results of the network capacity assessment showed that most of the sites would be unlikely to have any issues connecting to the gas network. It will be important to ensure that any new sites identified

through the Local Plan 2042 are able to be satisfactorily accommodated within the existing network.

Digital Infrastructure

Oxfordshire County Council's Digital Infrastructure Programme aims to improve digital infrastructure across the county and their work includes bespoke projects such delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

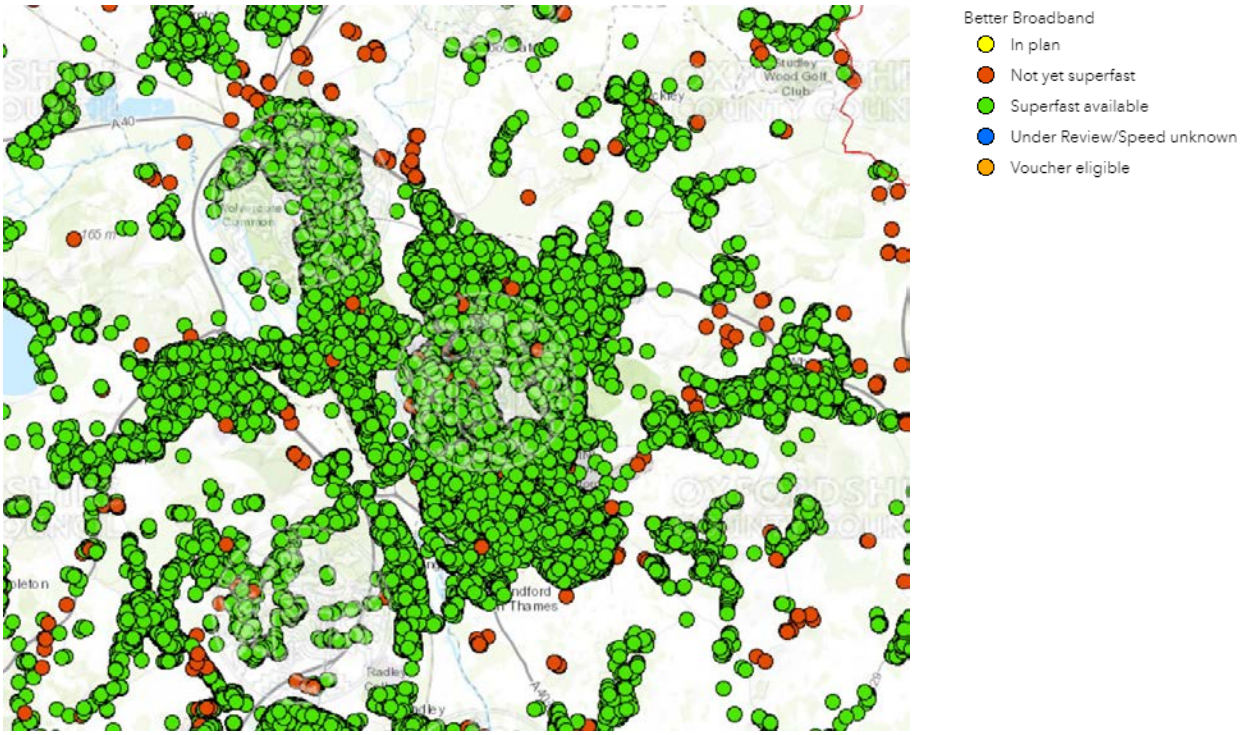

Figure 3: Map of broadband coverage in Oxford City. Source: Digital Infrastructure Oxfordshire.

Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mps). Figure 3 shows the availability of superfast connections across the city is now widespread, although there are still some areas where improvements are needed. Good broadband connections can help support a range of employment opportunities including supporting opportunities that enable flexible and hybrid working styles.

The County Council has been undertaking work in relation to the roll out of full fibre for commercial buildings, with the aim that this will also support the delivery of high-quality digital infrastructure to surrounding residential properties. Another County Council project is supported by a funding source available from central government which can only be used for the 'final 20%' harder to reach properties and ensure that they have 'superfast' connectivity. Although it is often used to support the delivery of broadband outside of urban areas the fund may apply to some areas of Oxford.

Another important aspect of digital connectivity is coverage of telecoms and mobile phone networks. Coverage varies across the city based upon which of the four main mobile network operators are being used to provide this service, with higher generations of network (up to 5G which is currently being rolled out nationally), being able to offer increased performance and download speeds.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Infrastructure is needed to mitigate the impacts of new development and support its delivery. A new Local Plan provides an opportunity to review and update the existing infrastructure requirements identified to support the current adopted plan. Without a new plan, any infrastructure schemes needed to support the delivery of new additional development (not previously identified within the current Local Plan) may not be delivered in a timely manner.

Discussions with key stakeholders and infrastructure delivery partners is an important aspect of the plan-making process because key stakeholders can identify infrastructure and funding gaps needed to support development. Having a clear and up-to-date understanding of the likely future development in an area can assist infrastructure partners with infrastructure planning and funding programmes which often do not align with the Local Plan making process. The likely trends without a new Local Plan could mean that key critical infrastructure issues are not identified at an early stage and this could result in delays to infrastructure delivery. A new Local Plan provides an opportunity to identify and address issues with infrastructure providers and key stakeholders to ensure that infrastructure is delivered in a timely manner to support mitigate the impacts of development.

5. Options for Local Plan 2042 policy

The analysis set out in the previous sections of this background paper indicates is a need for the Local Plan 2042 to include specific policies in the plan relating to infrastructure delivery. These policies, supported by appropriate evidence including the Infrastructure Delivery Plan (IDP) and the Infrastructure Funding Statement (IFS) support the timely delivery of infrastructure required to mitigate the impacts of development. Such policies also provide an opportunity to identify specific infrastructure projects, the delivery of which, would help deliver the plan's vision.

The Plan therefore include policies that address the following topic areas:

- Infrastructure delivery and new development
- Digital infrastructure to support new development

For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal scoping report).

Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy Option set 014a (draft Policy S3): Infrastructure Delivery in New Development

National policy requires local plans to make sufficient provision for a range of different types of infrastructure. This option set looks at two options - Option A considers introducing a policy to require development proposals make a contribution towards or deliver the infrastructure required to meet identified needs. Option B, in contrast considers the positive and negative consequences of not introducing such a policy.

Table 1.3 Policy options set 014a – Infrastructure Delivery in New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Include a policy that sets out how and when development proposals are expected to contribute to, or deliver the infrastructure required to meet identified needs. Make specific reference in the policy to the Infrastructure Delivery Plan (IDP) and set out a selection of specific infrastructure projects. Support the use of on- and off-site contributions and identify appropriate delivery mechanisms (e.g., S106, S278, CIL) to support the timely delivery of infrastructure.	Provides clear advice about how and when infrastructure delivery is needed to mitigate the impacts of development. The IDP forms a key part of the evidence base which helps to demonstrate that there is a funding gap and that contributions from development can be sought. Setting out the specific infrastructure projects in the policy can help the plan achieve its vision.	No specific reference about how best to delivery infrastructure projects that are themselves resilient to future climate change impacts. Policy only explicitly mentions rail and bus infrastructure requirements.
Option B Do not include a policy that supports infrastructure delivery in new development.	Limited or uncertain positive consequences of this approach	Likely to cause uncertainty about future infrastructure requirements and associated costs, all of which need to be negotiated through the development management

		process. This could lead to delays in the infrastructure provision and result in a more resource-intensive development management process, which could increase the time taken to determine planning applications. Would not identify and may not result in the delivery of key infrastructure projects required to support the plan's vision

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option A **High-level screening conclusion?** Significant effects unlikely **Screened in for detailed appraisal?** No **Rationale:** Option A is unlikely to have significant effects on the SA objectives. This is in part because the policy provides a mechanism to support the timely delivery of infrastructure, which itself mitigates the identified impact the level of growth proposed in the plan. When considered against the SA objectives, option is likely to have neutral or minor positive effects on SA Objective 6 Services and Facilities, and may support increased accessibility and connectivity through delivering rail, bus and active travel measures which are likely to have an overall neutral or minor positive effect on SA Objective 8 Transport and air quality as a shift away from non-car modes is more likely with the delivery of improved rail, bus and active travel infrastructure.

Policy Options Set 014b (draft Policy I1): Digital Infrastructure to support New Development

Table 8.2: Policy options set 014b: Digital Infrastructure to support New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require the provision of high-speed digital infrastructure (integration of gigabit ready physical infrastructure, future proofed construction to allow for integration if not immediately available) in all development, including residential, employment and conversions.	Ensures that development schemes connectivity is delivered in a consistent and measurable manner. Compliance with NPPF (para 119) and building regs.	There may not be any need for specific policy as building regs and NPPF already contain provisions for digital infrastructure and connectivity.
Option b Have no specific policy on digital infrastructure, rely on national planning policy.	NPPF already has permissive approach to communications infrastructure (paras 119 – 123), and local authorities are directed to make decisions on planning grounds only, which can already be covered by other relevant policies in plan. There is already growing provision of high quality infrastructure.	NPPF only addresses the provision of infrastructure by service providers, with no specific requirements for levels of connectivity and access at individual user level. NPPF also requires a specific policy so not having one will be in contravention.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:**

The options most directly influence **criterion 6. Services and Facilities** and may also have relevance t**o criteria 5. Inequalities,** as uneven access to high quality digital services may be an indicator of spatial and socioeconomic inequality. There may also be relevance to **criteria 1** and **8** as enhanced connectivity could potentially reduce the need for some journeys**.** The impacts are not expected to be more than minimal in the context of the other policies in the plan. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

841

6. Conclusions including key sustainability issues

A range of infrastructure is needed to support the level of growth proposed in the Local Plan 2042. Infrastructure is often delivered by third party providers, whose delivery plans are not always synchronised with the development planning process. As such, the production of a new Local Plan provides an opportunity to update third-party providers with development projections. This can assist with ensuring infrastructure is delivered in a timely manner to support d.

Key sustainability issues for the Local Plan to address:

- The timely delivery of planned upgrades to wastewater infrastructure are needed to support proposed housing and employment growth in the city over the plan period.
- Key infrastructure projects (such as improvements to Oxford Railway Station and the re-opening of the Cowley Branch Line to passenger services) can improve local accessibility by reducing travel time across the city. These projects can also unlock economic growth by increasing the accessibility of existing employment areas to a wider range of non-car modes of travel.
- The infrastructure capacity of other third-party utilities providers (e.g., energy) to support the level of development proposed in the Local Plan 2042 should be kept under review to ensure there is sufficient capacity to meet need across the plan period.
- Local energy infrastructure provision (e.g., district heating) can be a highly efficient way of providing affordable heating which can help address inequalities in the city.
- It will be important that any new infrastructure delivered is supports wider climate emergency objectives associated with Oxford's commitment to net zero.
- Incorporating natural solutions as part of new infrastructure.
- Ensuring infrastructure supports people to live healthy, active lives (e.g. walking/cycling, doctors etc.).
- Ensuring that the city is resilient and adaptable to future changes in technology (self-driving vehicles etc.).
- Delivery of high quality digital infrastructure for business and home users can support flexible and hybrid working as well as other business and leisure needs.

6.1. Preferred approaches for the Local Plan 2042

Section 5 identifies a number of topics that the Local Plan 2042 could implement policy to address to the provision of physical and digital infrastructure in support of development in Oxford. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Infrastructure Delivery in New Development – draft Policy S3

The preferred approach for the Local Plan 2042 draft policy to take forward is **option A.** This is because the local plan needs to enable infrastructure to be delivered in order to mitigate the impact of the development it proposes. The draft policy provides the mechanism to seek contributions for, or deliver the identified infrastructure needed to support the growth proposed in the plan.

Digital Infrastructure for new development – draft Policy xx

The preferred approach for the Local Plan 2042 draft policy is to take forward **option A**. This approach ensures compliance with the NPPF, which is supportive of infrastructure provision and requires a specific policy. It also allows the local plan to make specific requirements and set standards at individual scheme level with regards the type of development, level of connectivity, access and type. It will be possible to ensure delivery of infrastructure at a consistent level that can be effectively monitored, and which is response to the local/regional needs of the city's employers and residents.

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	**6. Race & Ethnicity**
2. **Disability**	**7. Religion or Belief**
3. **Gender Reassignment**	**8. Sex**
4. **Marriage & Civil Partnership**	**9. Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.** New Positive Action Policy	Oxford Local Plan 2042	**2.**	**The implementation date of the activity under consideration:**	
3.	**Directorate/Department(s):**	Planning and Regulation	**4.**	**Service Area(s):**	Planning Services, Planning Policy
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Gabriella Barnes gbarnes@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	Gabriella Barnes gbarnes@oxford.gov.uk **Error! Bookmark not defined.**
7.	**Is this a new or ongoing EqIA?**	New	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	N/A
9.	**Date this EqIA started:**	01/05/2025			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Will be attached to the cabinet report and therefore published.	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	Budget	Decommissioning	Commissioning	Change to an existing activity.	
		New Activity	☐Others. Please specify:			
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☐ Good, affordable homes N/A	☐ Strong, fair economy N/A	☐ Thriving Communities N/A	☐ Zero Carbon Oxford N/A	☐ Well run council Yes
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care. N/A	☐ Diverse and engaged workforce. Yes	☐ Leadership & organisational commitment. N/A	☒ Understanding and working with our communities. N/A	
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	The Oxford Local Plan 2042 will be the fundamental development framework for the city of Oxford. The Local Plan will have a material effect on the amount and type of housing (including affordable housing); the number and type of jobs; the location and nature of future development; and the protection of open space; across the city, among other aspects. The scope of the Local Plan and the 20-year time span mean that this document will have a significant impact on the lives of those who live and work in or visit the city. Important choices will be made between competing demands and limited resources will be allocated. The Local Plan will				

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		seek to address inequalities but the policies will need to be assessed for unintended consequences for equality issues.
16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	Producing a Local Plan is a statutory requirement. The Loal Plan 2036 is still in place as the statutory development plan, but it will become more out of date over time, especially 5 years after adoptions, which is in June 2025. That makes it easier to argue that nation planning policy should be relied upon, rather than the locally set policies that attempt to address issues in Oxford.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	Early Engagement Survey - 17/03/2025-28/04/25 - Short questionnaire published on Oxford City Council's consultation portal regarding the new Local Plan
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation,	The policies of the draft Local Plan are based on an evidence base comprised of studies on topics such as housing and employment (e.g. the Housing and Economic Needs Assessment and Housing and Economic Land Availability Assessment), transport (e.g. the Central Oxfordshire Travel Plan and advice from the County Council as the Highway Authority), site analysis (e.g. the Green Infrastructure Assessment and the Green Belt Study update) and others including conversations with, and the strategic plans of, infrastructure and service providers. In addition, the most up-to-date available demographic information was taken from sources such as the Census data 2011 and 2021 releases, population estimates (Office for National Statistics),

	-articles, -reports, -briefs.	2019 Indices of Multiple Deprivation (DCLG), Experian data, Oxford City Council Housing Information System Database and other national, regional, and local sources of data. The process for producing a Local Plan places great weight on the quality of the evidence supporting policy decisions. The evidence base will be tested through public examination by a Planning Inspector before the Local Plan can be adopted.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	

Section 4: Impact analysis.

20.	**Who does the activity impact?** **Check as needed.** The impact may be positive, negative or unknown.	**Service Users**	Yes	No	Don't Know
		Members of staff	Yes	No	Don't Know
		General public	Yes	No	Don't Know
		Partner / Community Organisation	Yes	No	Don't Know
		City Councillors	Yes	No	Don't Know

		Council suppliers and contractors	Yes	No	Don't Know

21.	**Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**					
Protected Characteristic	**Positive**	**Negative**	**Neutral**	**Don't know**	**Data/information/evidence supporting your assessment**	**Analysis & insight** **Mitigations**
Age	X				Several of the policies throughout Chapter 2 (which specifically deals with housing) of the draft Local Plan explicitly address the diverse needs of the different age groups in Oxford. In the preparation of the draft Local Plan, the Council has considered the housing requirements of many different age groups (students, young people, families, adults, elderly people, etc.). Chapter 2 includes specific policies relating to student accommodation (H9 and H10), boarding school accommodation (H16), shared housing/Houses in Multiple Occupation (H8), family-sized housing (H6) and older persons and other specialist accommodation (H13), as they relate specifically to different age groups. These policies are considered to have	

851					positive impacts upon the cohorts for which they are relevant, without costing others or negatively affecting other demographic groups, as they all strive to contribute towards establishing a mixed and balanced community which facilitates a healthy environment for the success of all people at all stages of their lives. Whilst policies H6, H8 and H9 include restrictions upon the free-market proliferation of specific housing types, it is not considered that these restrictions negatively impact the relevant target groups (particularly young adults/students through policies H8 and H9), as the aim and function of the restrictions is to ensure mixed and balanced communities in which all cohorts of age groups benefit from a healthier social mix. The potential self-segregation/selection of communities by age group through the unfettered forces of market demand is considered to be more likely to have a negative effect on specific age groups than ensuring their healthy mix throughout the city as a whole. Chapter 7 focuses on movement and specifically works to facilitate sustainable transport modes as alternatives to private car use; which will make the city more accessible to people of all ages. Further policies in Chapter 7 of the draft	

					Local Plan relating to communities, facilities, and the vibrancy of Oxford's city and district centres, are specifically targeted at protecting, retaining, and encouraging facilities needed for the general health and wellbeing of all age demographics (policies C2, C3, C4 and C5). Overall, the effect of the draft Local Plan on the age equality strand is considered to be positive.	
Disability **(Visible and invisible)** 852	X				The thrust and ambition of the draft Local Plan strives to focus development in locations which are accessible by public transport & non-car modes to make the city more accessible to people of all abilities. This ambition forms one of the overarching threads within the document, which seeks to foster a liveable city in which residents have access to the basis of their daily needs within an easy walking distance of their homes. In doing so, the document works to protect provision of to community and recreational facilities. In the preparation of the draft Local Plan, the Council has considered the need for accessible and adaptable dwellings, and the need to ensure that services and facilities are accessible to all. Chapter 6 on design includes Policy HD14 - Accessible and Adaptable Homes - which adopts optional Building Regulations requirement M4(2) to	

853					provide enhanced accessibility and adaptability for all new affordable dwellings and for a minimum of 15% of new general market dwellings. This policy also adopts Building Regulations requirement M4(3) for dwellings for wheelchair users, for a minimum of 5% of all dwellings for which the City Council is responsible for allocations or nominations on sites of more than 20 dwellings. It is considered that this policy will result in some positive effects for housing quality for people with disabilities. Furthermore, the policies contained in Chapter 7 focus on movement and work to support a range of sustainable transport modes, which will provide residents and users of Oxford with a greater range of movement options and make the city more accessible to people of all abilities. Overall, the effect of the draft Local Plan on the disability equality strand is considered to be positive.	
Gender re-assignment			X		No equalities impact identified.	
Marriage & Civil Partnership			X		No equalities impact identified.	
Race, Ethnicity			X		No equalities impact identified	

and/or Citizenship						
Pregnancy & Maternity			X		No equalities impact identified.	
Religion or Belief			X		No equalities impact identified.	
Sex			X		No equalities impact identified.	
Sexual Orientation			X		No equalities impact identified.	

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Socio-economic inequalities such as: **-** income and factors that impact income. - access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	X				The draft plan attempts to address some inequalities directly, for example by protecting a diverse range of employment sites, by requiring Community Employment and Procurement Plans and Affordable Workspace.	
Other (voluntary consideration) **For example:** Migrant, refugee, or asylum			x		No equalities impact identified.	

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seekers.						
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members			x		No equalities impact identified.	

Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.** The Local Plan will seek to deliver specific types of development and at specific locations. As such, there is the potential for the policies to have differential impacts on different equalities groups. Development at any site could have equality implications both for new residents and users/workers within the site, and for communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies. Overall, draft Local Plan policies have been designed to attempt to improve the relevant equality strands where possible, and to otherwise have a neutral impact. More specifically, it is not anticipated that there will be a direct impact on equality issues related to gender reassignment, sex, sexual orientation, pregnancy and maternity, or religion and beliefs as a result of the policies and development proposed in the Local Plan; whilst it is considered that the policies and resulting development patterns of the Local Plan are likely to have some positive effect on the age, disability and socio-economic equality strands.							
	☐	Stop and reconsider the activity.	☐		Adjust activity before beginning the activity and continue to monitor.	☒	No major change(s) or adjustments	☐	No major change(s) or adjustments and continue with the

						and continue with activity but continue to monitor.		activity. No need to monitor in the future.

23.	**Please explain how you have reached your conclusions above.**		The conclusions have been reached by careful consideration of the equality strands against the draft local plan policies.

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.		Planning and Regulation		
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**		Planning Policy		
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.		When relevant to development of the plan	**27.** **Date when the EqIA will be reviewed again.**	October 2025

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Section 7: Sign-off

Name: Gabriella Barnes	Name:	Name:
Job Title: Assistant Planner	Job Title:	Job Title:
Signature: G.Barnes ---	Signature: ---	Signature: ---
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature: ---	Signature: ---	Signature: ---
Name: Full Name	Name: Full Name	Name: Full Name
Job Title: Type here	Job Title: Type here	Job Title: Type here
Signature: ---	Signature: ---	Signature: ---

You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

Suggested list include are:

1) Project lead/
2) Head of serv team.
3) Person who EqIA.
4) EDI Lead.
5) EDI Specialis
6) For joint proj consider the

   1. Other pro
   2. Other ser and/or te lead/man

This is not an e list.

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Appendix 2 : Risk Register for the First Draft Oxford Local Plan 2042 Regulation 18

Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Project Delays	The timetable for the Local Plan production is very tight- any delay may result in the council not having an upto date development plan	Threat	Delays could result from lack of agreement at Council	Lack of agreement would result in delay to consultation and submission of the Plan	01/05/2025	Director of Planning and Regulatory	3	3	3	2	3	2	Reduce risk by ensuring portfolio holder and lead cabinet members making all parties aware of timetable and key dates well in advance and monitor progress, meeting	Reduce				Director of Planning and Regulatory
External delays: delays to process	There is potential for unanticipated delays in document production owing to evidence base gathering not being completed.	Threat	Delays may be a result of a number, or combination, of factors (for example, external agencies or consultants maybe unable to fit in with timescales, issues may be more complex to understand/resolve than anticipated, or there may be a lack of resources available to complete the programme).	Lack of agreement would result in delay to consultation and submission of the Plan	01/05/2025	Director of Planning and Regulatory	3	3	3	2	1	1	Reduce risk by ensuring all parties are aware of the timetalbe and key dates for Plan's submission in advance and deal with issues in a timely manner.	Reduce				Director of Planning and Regulatory
Opposition and Plan being found unsound by the Inspector	If the Plan is found to be unsound it will need to be withdrawn and amended prior to resubmission. This would result in considerable delays to adoption and the council would have to determine applications in the absence of an up to date develpment plan resulting in reliance on the NPPF and the presumption in favour of sustainable development.	Threat	The legal process may not have been fully followed or the Plan failing against one of the tests of soundness.	Plan production would need to be restarte which would be costly and delay implementation of the Plan's strategy	01/05/2025	Director of Planning and Regulatory	3	3	3	2	3	1	Follow procedures as with Plans found sound and seek legal adive through the Plan preparation process, look to apply best practice principles and advice on soundness issues and only submit when confident that all the proper plan preparation process has been followed and the correct evidence gathered to inform the plan strategy.	Reduce				Director of Planning and Regulatory

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To:	**Cabinet**
Date:	18 June 2025
Report of:	Director of Housing
Title of Report:	Annual Complaint Performance & Service Improvement Report 2024/25

	Summary and recommendations
Decision being taken:	To approve the Annual Complaint Performance & Service Improvement Report (Landlord Services) 2024/25
Key decision:	No
Cabinet Member:	Councillor Susan Brown, Leader of the Council Councillor Linda Smith, Cabinet Member for Housing
Corporate Priority:	Well-Run Council
Policy Framework:	Housing, Homelessness & Rough Sleeping Strategy 2023-28

Recommendation(s): That Cabinet resolves to:

1. **Agree** the content of the Annual Complaint Performance & Service Improvement Report (Landlord Services) 2024/25 in Appendix 1.
2. **Provide** a formal response to the Annual Complaint Performance & Service Improvement Report 2024/25.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Annual Complaint Performance & Service Improvement Report (Landlord Services) 2024/25	No
Appendix 2	Housing Ombudsman Code Complaint Handling Self-Assessment	No

Appendix 3	Draft response from Cabinet	No

Introduction and background

1. The Social Housing (Regulation) Act 2023 places a legal duty on the Housing Ombudsman to monitor social housing landlords' compliance with the Housing Ombudsman's Complaint Handling Code.
2. From 1st April 2024, compliance with the Housing Ombudsman's Complaints Handling Code became a statutory requirement of all social housing landlords, including Local Authorities with housing stock.
3. The Complaint Handling Code requires that landlords must produce an Annual Complaints Performance & Service Improvement Report for scrutiny and challenge, as well as completing and publishing an annual self-assessment against compliance with the Code. This must be published by 30th September.
4. The Annual Complaints Performance & Service Improvement Report (Landlord Services) 2024/25 is set out in Appendix 1. This report covers all complaints we have handled from 1st April 2024 to 31st March 2025 that relate to our services as a landlord and/or would come under the scope of the Housing Ombudsman. It does not include complaints about other Council services which would come under the scope of the Local Government & Social Care Ombudsman.
5. The Housing Ombudsman Complaints Handling Code states:

   "8.1 Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:

   a. *The annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements*
   b. *A qualitative and quantitative analysis of the landlord's complaint handling performance – this must also include a summary of the types of complaints the landlord has refused to accept*
   c. *Any findings of non-compliance with the Code by the Ombudsman*
   d. *The service improvements made as a result of the learning from complaints*
   e. *Any annual report about the landlord's performance from the Ombudsman*
   f. *Any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord*

   8.2 The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this."
6. Whilst the report needs to be submitted to the Housing Ombudsman, they have instructed that the report should be written in a format to present the information to residents.
7. For the purpose of the annual report, the Housing Ombudsman considers that Cabinet is the governing body.

8. The report seeks to provide information on the performance of the Council's complaint handling relating to the landlord function, in terms of the volume, outcomes and timeliness of the responses. In addition, the report seeks to identify themes, trends and lessons learnt that will drive service improvements.
9. The Report for 2023/24 was approved by Cabinet on 16th October 2024, and was published on our website alongside Cabinet's response and our self-assessment.
10. Our self-assessment was amended earlier this year and reviewed by the Housing & Homelessness Panel on 6th March 2025.

Report Structure

11. The report covers the role of the Housing Ombudsman, an explanation of our complaints process, as well as performance data and analysis for complaints handled by OCC and ODS relating to the housing landlord function.
12. The report also covers details of engagement with the Housing Ombudsman, including the determinations received during 2024/25.
13. Further analysis of trends and challenges is also provided, as well as learning, service development, and improvements made.

Finally, the report sets out further improvements plans for 2025/26 and beyond.

Key Findings

The key points to be noted for the response are:

a. An overall drop in the number of Stage 1 complaints received, due to a large decrease in the number handled by ODS. This is attributed to increased use of technology to better communicate with tenants and identify issues promptly after a repair, as well as a greater understanding of what should be considered a complaint, and what is within their remit.
b. An increase in the number of Stage 1 complaints handled by the Council, some of which can be attributed to taking on cases ODS would otherwise have handled.
c. For ODS, of the complaints responded to within 2024/25 at Stage 1 and 2, they responded to 100% of those within target.
d. For complaints handled by the Council within that period, 48.6% were responded to within target at Stage 1, and 83.8% at Stage 2. This was due to vacancies within the Customer Care & Complaints team, staff absence in the team and in other service areas, and the increased volume of enquiries.
e. The report details steps we have taken to prevent this issue in future, including additional staff within the Customer Care & Complaints team, and additional staff in other teams we work with.
f. The report also details improvements made to our services following complaints in 2024/25. This is not comprehensive as the focus of the Customer Care & Complaints team has had to be on investigating and responding to complaints, however we have been able to ensure learning from the most serious complaints via multi-disciplinary sessions. During 25-26, with a more stable staff team, we will be putting a work programme

together that will look to increase our learning and service improvements, capturing intelligence and thematic issues to put in place fundamental service improvements that will tackle the root cause of issues.

Requirement of Cabinet

14. There is a requirement for the governing body (Cabinet) to provide a response to the Annual Complaints Performance & Service Improvement Report and for that response to be incorporated within the final report or published alongside it.

Financial implications

15. There are no financial implications arising from this report.

Legal issues

16. There is a legal requirement to have an annual complaints performance and service improvement report approved by the governing body (Cabinet) and for the report to be published. A response by Cabinet to the report will be published with the report. The report, Cabinet's response, and the self-assessment must also be submitted to the Housing Ombudsman.

Report author	Kat Mayes
Job title	Customer Care & Complaints Manager
Service area or department	Housing
Telephone	07302 002020
e-mail	kmayes@oxford.gov.uk

None

Annual Complaint Performance & Service Improvement Report 2024/25

(Landlord Services)

Contents

Introduction 2
Definition of a complaint 3
The complaints process 3
Performance 6
Trends and challenges 17
Learning & service development – what we've done in 2024/25 21
Plans for 2025/26 and beyond 25
Closing remarks from the Customer Care & Complaints Manager 27

Introduction

This is our second annual Complaint Performance & Service Improvement report, following the introduction of the Housing Ombudsman's new Complaints Handling Code which came into force on 1st April 2024.

The Social Housing (Regulation) Act 2023 also granted new statutory powers to and placed statutory duties on the Housing Ombudsman, so it is more important than ever that we ensure we are compliant with the Code and strive to be transparent and accountable.

We also adhere to the Regulator of Social Housing's Consumer Standards, and our complaints handling is specifically guided by the Transparency, Influence and Accountability Standard. We are required to demonstrate that we have a robust approach to handling complaints, a culture of learning from them, that we implement improvements, and that we publish the data around this.

As required by the Housing Ombudsman, we produce this annual report to share our findings, successes, and lessons learned with the Ombudsman, the Council Members, and most importantly, our residents. We are also publishing our Complaints Handling Code Self-Assessment, which we are obliged to complete at least annually. The most recent self-assessment was reviewed by the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 6th March 2025.

This report covers the period from 1st April 2024 to 31st March 2025, and encompasses all complaints relating to the services Oxford City Council (or those acting on our behalf) provide as a landlord. This does not include complaints regarding homelessness, housing benefit, or any other Local Authority functions that would come under the remit of the Local Government & Social Care Ombudsman.

These complaints may have come from tenants, shared owners, leaseholders, private residents, or third parties acting on behalf of any of those. The complaints were handled by either the Customer Care & Complaints team within Landlord Services or, where appropriate, by our contractor, ODS, on our behalf.

Further information on complaints

Our annual self-assessment against the Housing Ombudsman's Complaint Handling Code and other Ombudsman-required publications can be found here: https://www.oxford.gov.uk/complaints-council-housing

Further information on our complaints procedure and how to make a complaint can be found here: https://www.oxford.gov.uk/comments-compliments-complaints

Information and support regarding complaints can be found on the Housing Ombudsman's website: https://www.housing-ombudsman.org.uk/

Definition of a complaint

Based on the requirements of the Housing Ombudsman's Code, Oxford City Council defines a complaint as:

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its staff, or those acting on behalf of the Council, affecting an individual citizen or group of citizens.

Service requests made for the first time and reports of anti-social/nuisance behaviour are not considered to be complaints for the purpose of our procedure. Complaints about Councillors, or about Freedom of Information and Subject Access Requests are subject to their own separate procedures and are also not included. We may also not consider complaints where the issue has already been addressed in a previous complaint, or regarding incidents that occurred more than 12 months ago. More information on what is and is not a complaint can be found on our website.

The complaints process

A resident or their representative can make a complaint by telephone, by email, via our website, by post, or by speaking to their Tenancy Management Officer or other member of staff. It is not necessary to use the word 'complaint', as it is our duty to recognise an expression of dissatisfaction that meets the criteria and offer to record it as such.

We have a two-stage process, as set out in the Housing Ombudsman's Code.

Stage 1

At Stage 1, the Code instructs us to acknowledge the complaint within 5 working days. This acknowledgement will set out our understanding of the complaint, what the complainant is looking for as a resolution, provide the date by which they can expect a response, and provide the contact details of the Housing Ombudsman.

The Code says we are to respond within 10 working days, and in this response we explain how we have investigated the complaint, set out our findings, confirm any action taken, state whether it has been upheld or not, offer compensation where appropriate, and detail what any next steps are, including how they can escalate to Stage 2. We also include the details of the Housing Ombudsman again.

We are permitted to use extensions when necessary, but this must be no more than 10 working days without good reason. Extensions may be required if it is a particularly complex case, if visits need to be arranged, if we need input from someone on annual leave, or if we are awaiting further information or evidence from the complainant. We will always explain why an extension is required.

Stage 2

If someone is unhappy with the response they received at Stage 1, or if we fail to do what we agreed to do as part of the resolution offered, they can ask for their complaint to be considered at Stage 2 where it will be reviewed by someone more senior.

At Stage 2, the Code says we are to acknowledge the complaint within 5 working days. This acknowledgement will follow the same format as the one at Stage 1, as well as including confirmation as to why the complainant has escalated the complaint to Stage 2 (if known), and it will state if there are any issues from Stage 1 that have been resolved and don't require further investigation.

The Code allows us 20 working days to respond at Stage 2. In this response we will explain the outcome of our review and any additional investigation, as well as including any changes to the outcome and proposed resolution. Again, the details of the Housing Ombudsman are provided along with confirmation that they have completed the final stage of our internal process and can approach the Housing Ombudsman should they remain dissatisfied.

We are permitted to use extensions when necessary, but this must be no more than 20 working days without good reason. Extensions may be required for the same reasons given above. Again, we will always explain why an extension is required.

Housing Ombudsman

We are required by law to be part of the Housing Ombudsman scheme and comply with their Code. As part of this, we have to publish an annual self-assessment of our compliance with the Code, as well as this report. Annual reports need to include details of all our determinations and orders made by the Housing Ombudsman against the Council in the year.

If we fail to meet our membership conditions, including following the Code, they can: issue a Complaint Handling Failure Order; report us to the appropriate regulator (this would be the Regulator of Social Housing for most complaint issues); and they can publish the details of the failure on their website and publicly via press releases.

The Housing Ombudsman require that a complaint has completed our internal process or has been declined for investigation by us before they will take the case. They may contact us to confirm that a complaint has been through Stage 2, or ask us to escalate it if it hasn't. They can also give us a deadline to provide a final response.

During their investigation, the Ombudsman will request evidence from us which we are obliged to provide. They may decide that the complaint sits outside of their jurisdiction and/or refer a case to the Local Government & Social Care Ombudsman. If they have identified a solution that could quickly resolve the issue, they can propose this, or they may suggest mediation.

Following an investigation, the Housing Ombudsman will issue a determination. They will decide if there has been a service failure, maladministration, or severe maladministration, or if they are satisfied with the actions we have taken. They can issue various orders, including instructing us to:

- Apologise to the complainant
- Pay compensation to the complainant
- Takes action to put things right
- Stop doing something they think we should not do
- Review our policies and practice.

We have to provide evidence to the Ombudsman that we have complied with their orders. If we fail to do as they ask, they can refer us to the relevant regulator, publish the details of our failure to comply, issue a Complaint Handling Failure Order, and/or apply to the Secretary of State to have their order enforced as if it were a court order.

Performance

The following sections detail our complaints performance in 2024/25.

Stage 1

From 1st April 2024 to 31st March 2025, we handled the following number of complaints at Stage 1:

	2023/24	2024/25
Stage 1 Complaints Handled by the Council	134	226
Stage 1 Complaints Handled by ODS	431	188
Stage 1 Complaints Total	565	414

Whilst complaints handled by the Council have risen by 68.7%, the overall number of complaints is lower than last year due to the considerable drop in complaints handled by ODS. This reduction in complaints for ODS has been attributed to the roll-out of systems enabling them to address customer feedback more promptly, identifying that some types of complaint are related to policies and actions within the Council rather than ODS and should be handled by the Council, and a better understanding of what is a complaint and what is a service request made for the first time.

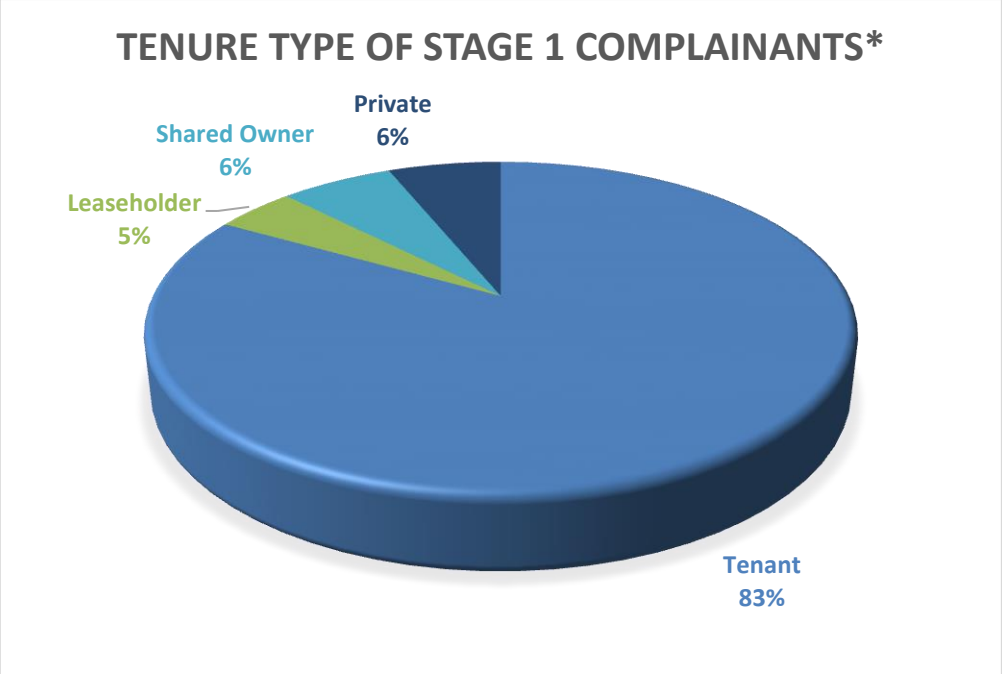
In addition to the Stage 1 complaints handled by the Council, we declined to accept and investigate 7 complaints for the following reasons:

- 2 were complaints the resident had already made previously
- 2 were service requests being made for the first time
- 1 was regarding an issue that happened more than 12 months ago
- 2 were not regarding services provided by the Council.

When complaints are rejected, the resident is provided with the reasons for this, directed to the appropriate channel/organisation for their issue (where applicable), and provided with the contact details of the Housing Ombudsman.

ODS had 11 Stage 1 complaints that were either withdrawn, rejected, or were referred to the Council.

The chart below shows that 83% of the complaints handled within the Council came from tenants (or those acting on their behalf), compared to 86% last year. Leaseholders made up 5% of the complainants (7% last year), with shared owners at 6% (same as last year), and private owners having increased to 6% from 1% last year.



* This is taken from complaints handled by the Council. ODS do not have records of the tenure type of the person making the complaint.

Stage 1 complaints by service area

Of the Stage 1 complaints investigated by the Council, 4 were withdrawn. 38 are still in progress (see the 'Trends and challenges' section below). ODS still have 17 of their complaints ongoing. These are not included in the figures for upheld/not upheld.

Overall, of the complaints received during the relevant period that have been resolved, 66% of Stage 1 complaints were upheld (this was 59% in 2023/24). Of these, 69% of those handled by the Council were upheld (61% last year), and 57% of those handled by ODS (58% for 2023/24).

It should be noted that some complaints may have covered more than one service area so the total number shown below will be higher than the number of complaints received.

A complaint being upheld does not mean that all of the points raised were upheld, therefore it may show as 'upheld' against a service area that was involved, but we did not find any service failures in their part of the complaint.

	Total	Number Upheld
ODS	171	98
Property Services – Repairs & Maintenance	112	67
Tenancy Management	83	44
Garages	5	0
Anti-Social Behaviour	13	3

Home Ownership	9	5
Property Services – Other	22	14
Legal Services	3	2
Development/OX Place	12	8
Contact Centre	9	7
Involvement	3	0
Tenancy Sustainment	2	1
Income	16	6
Customer Care & Complaints	2	2
Business Improvement	1	0

Stage 1 timescales

Of the Stage 1 cases handled by the Council, 95 were responded to using an extension to the target date. Reasons for this include delays in getting a response from the relevant department, awaiting reports from external contractors, staff leave/sickness absence, staff shortages, and awaiting further information from the complainant. For cases handled by ODS, 52 complaints had their target date extended.

48.6% of Stage 1 complaints handled by the Council and 100% of Stage 1 complaints handled by ODS were responded to within the Housing Ombudsman's Complaint Handling Code timescales. Please see the 'Trends and challenges' section below for more insight into this.

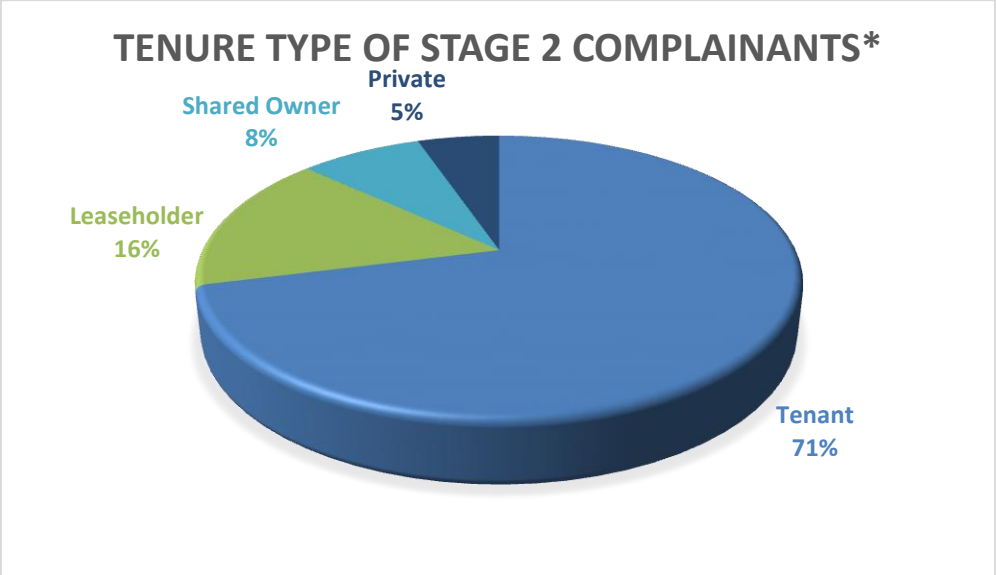
Stage 2

From 1st April 2024 to 31st March 2025, we handled the following number of complaints at Stage 2:

	2023/24	2024/25
Stage 2 Complaints Handled by the Council	19	38
Stage 2 Complaints Handled by ODS	11	13
Stage 2 Complaints Total	30	51

The Council did not reject any complaints at Stage 2. ODS had one Stage 2 complaint that was referred to the Council.

The chart below shows that 71% of the complaints handled at Stage 2 within the Council came from tenants (compared to 84% last year), with a small increase in Stage 2 complaints from shared owners (up to 8% from 5% in 2023/24), and a larger increase from leaseholders (16% this year from 6% in 2023/24).



* This is taken from complaints handled by the Council. ODS do not have records of the tenure type of the person making the complaint.

Stage 2 complaints by service area

Of the Stage 2 complaints investigated by the Council, 1 was withdrawn. 3 are still in progress (see the 'Trends and challenges' section below), and 6 that ODS are investigating are still ongoing. These are not included in the figures for upheld/not upheld.

Overall, 57% of Stage 2 complaints were upheld, which is a decrease from 83% in 2023/24. Of these, within ODS 33% were upheld, and within the Council 62% were upheld (down from 82% and 83% respectively in 2023/24).

Many of these will have already been upheld at Stage 1 but were escalated to Stage 2 for reasons such as seeking further compensation or repairs agreed not having been completed. It does not necessarily indicate that the Stage 2 conclusion disagreed with the Stage 1 decision.

It should be noted that some complaints may have covered more than one service area so the total number shown below will be higher than the number of complaints received.

A complaint being upheld does not mean that all of the points raised were upheld, therefore it may show against a service area that was involved as upheld, but we did not find any service failures in their part of the complaint.

	Total	Number Upheld
ODS	6	2
Property Services – Repairs & Maintenance	30	18
Tenancy Management	8	6
Home Ownership	4	0
ASB	2	1
Involvement	1	0
Development/OX Place	2	1
Customer Care & Complaints Team	5	4

Stage 2 timescales

Of the Stage 2 cases handled by the Council, 10 were responded to using an extension to the target date. The reasons for this included staff absence, awaiting responses from other departments, and waiting for reports from external contractors. Of the Stage 2 cases handled by ODS, 1 was responded to using an extension.

83.8% of Stage 2 complaints handled by the Council and 100% of Stage 2 cases handled by ODS were responded to within the Housing Ombudsman's Complaint Handling Code timescales. Please see the 'Trends and challenges' section later in the report for more information on this.

Compensation

Across Stage 1 and 2, the Council offered a total of £36,005.50 in compensation in 2024/25, excluding additional amounts ordered by the Housing Ombudsman. Housing Ombudsman orders to pay compensation are inclusive of any amount already offered or paid.

Housing Ombudsman Outcomes

In 2024/25, we received 7 decisions from the Housing Ombudsman, made up of 5 determinations, 1 finding that it was outside of jurisdiction, and 1 case resolved with Ombudsman intervention prior to investigation.

Overall, on the points investigated within the determinations they found:

- 6 instances of service failure
- 3 instances of maladministration
- 1 instance of no maladministration
- 2 instances of reasonable redress

As of 31st March 2025, we had 8 cases outstanding with the Ombudsman for investigation.

You can search decisions published by the Housing Ombudsman on their website: https://www.housing-ombudsman.org.uk/decisions/

The Ombudsman publish their decisions 3 months after the final decision date, omitting the names of the resident(s). They may decide not to publish a decision 'if it is not in the resident's or landlord's interest or the resident's anonymity may be compromised'.

The Housing Ombudsman cases that had an outcome in 2024/25 are detailed below:

Case 202220478 – Decision of 24th April 2024

This complaint was investigated by ODS on our behalf and completed Stage 2 of our procedure in August 2023. The complaint to the Ombudsman was about our response to the resident's reports of damp and mould, our response to reports about a loss of heating and hot water, and our complaint handling.

The Ombudsman decided they could not investigate the damp and mould complaint as it had not been included in the original complaint and was therefore outside of their jurisdiction. They found there had been a service failure regarding our response to the loss of heating and hot water, and that there was maladministration in respect of our complaint handling.

The Housing Ombudsman issued the following orders:

- *The landlord must do the following within the next four weeks:*

    a. *Provide a written apology for the failures identified in this report.*

    b. *Pay the resident compensation of £300 comprised of:*
        i. *£100 for the distress and frustration caused by its response to reports about a loss of heating and hot water.*
        ii. *£200 for the distress and inconvenience caused by its complaint handling.*

c. *Review the complaint handling in this case, with reference to the failings identified in this report, to determine what actions have been/will be taken to prevent a recurrence of these. The landlord should write to the Ombudsman with the outcome of this review.*

- *The landlord should provide this Service with evidence of compliance with these orders within the timescale set out above.*

Following their determination, an apology was sent to the resident, and the compensation ordered was paid. We carried out a review of the failings identified and provided the Ombudsman with our report, detailing the steps we have taken to prevent similar issues in future (see also the 'Learning and service development' section below). We received praise from the Ombudsman's Investigator for our response, which was described as 'an example of good practice'.

The full report can be found here:
https://www.housing-ombudsman.org.uk/decisions/oxford-city-council-202220478/

Case 202321079 – Decision of 15th May 2024

The Housing Ombudsman determined that this complaint regarding a health and housing assessment was outside of their jurisdiction. The resident was referred to the Local Government & Social Care Ombudsman.

Case 202327898 – Decision of 29th May 2024

This complaint was investigated by ODS on our behalf and completed Stage 2 of our procedure in September 2023. The complaint to the Ombudsman was about compensation following concerns about a subcontractor's failure to take appropriate precautions regarding asbestos.

Prior to investigating and as ODS had already upheld the complaint, the Housing Ombudsman contacted us to see if we would consider offering the £1000 requested by the complainant, or if we would accept mediation. ODS advised that the resident had not requested this as part of the complaint, but they felt it was an appropriate remedy and agreed to the payment. The Ombudsman was satisfied that following their intervention, the matter had been resolved.

Case 202300539 – Decision of 26th June 2024

This complaint completed Stage 2 of our procedure in July 2023. The complaint to the Ombudsman was about our response to the resident's reports noise, and they also looked into our complaint handling and record keeping.

The Ombudsman found that there were service failures in our handling of the resident's reports of noise, our complaint handling, and regarding our record keeping.

The Housing Ombudsman issued the following orders:

- *Within 4 weeks, the landlord must pay the resident a total of £550 compensation, made up as follows:*
  a. £400 for its handling of noise reports.
  b. £150 for complaint handling.

- *Within 8 weeks, the landlord must arrange for an independent structural survey to be carried out in the resident's property. If no structural issues are identified, the landlord should produce an action plan with timescales setting out the exploratory steps it will take to try to identify the cause of the noise, and what alternative options for resolution (for example, a move to a suitable property) may be available if the noise issue cannot be resolved. The landlord should then adhere to the timescales. The action plan should be shared with both the resident and the Ombudsman.*

- *Within 4 weeks, the landlord is ordered to review its current record keeping practices against this Service's spotlight report on knowledge and information, which sets out the benefits of good record keeping and provides recommendations for landlords. It should write to this Service with the outcome of the review, and details of any actions that it has/will take in relation to its record keeping practices.*

- *Within 4 weeks, the landlord should review its handling of the resident's complaint and establish whether any learning can be implemented to prevent the identified failing from occurring again.*

- *The landlord should provide evidence to the Ombudsman that it has complied with the above orders within the timeframes specified.*

Following the determination, we arranged the payment of the compensation, arranged for a structural survey as well as other visits to try to identify the source of the noise, arranged remedial work, and provided reports to the Ombudsman reviewing our practices against their Spotlight report on knowledge and information and reviewing our handling of the case. We had already made the improvements identified by this.

Case 202320570 – Decision of 28th October 2024

This complaint completed Stage 2 of our procedure in January 2024. The complaint to the Ombudsman was about our response to the resident's reports of a leak from the property above, our handling of their reports of damp and mould, and the resident's claim for compensation.

The Ombudsman found that there was maladministration in our handling of the resident's reports of a leak from the above property and with our handling of the resident's reports of damp and mould. They also found a service failure with the handling of the claim for compensation.

The Housing Ombudsman issued the following orders:

- *Within 4 weeks of this report the landlord must:*

    a. *Provide the resident with an apology around the failings identified within this report.*

    b. *Pay the resident compensation of £4,662.83. This is inclusive of any previous compensation it has paid. The landlord must provide evidence of compliance in the form of an invoice or system screenshot showing it has paid the compensation to the resident.*

    c. *Speak with the resident and identify if he wishes to make a claim for the damage to his belongings. If so, it must provide the resident with advice on making a claim to its insurer. Should the resident wish to make a claim, it must provide him with support to do so. It should show to the Ombudsman that it has provided both the advice and support in writing.*

    d. *Speak to the resident to identify if he has any further concerns in relation to the property. It must also complete an inspection of the entire property and:*

        i. *Provide the resident with a specific point of contact who he is able to liaise with about any ongoing concerns around damp and mould in the property.*
        ii. *Take necessary damp and moisture readings. It must confirm its findings to the resident and Ombudsman and if it needs to take any action.*
        iii. *Take necessary damp and moisture readings. It must confirm its findings to the resident and Ombudsman and if it needs to take any action.*
        iv. *If it identified that there are ongoing issues, it must provide the resident with an action plan and timeframe in which it aims to complete the works.*
        v. *The landlord must provide the Ombudsman with evidence of the post inspection findings, any action plan, its communication of the plan to the resident and provision of the specific point of contact.*
        vi. *If it identifies that there are ongoing issues which it must rectify, consider whether additional compensation is required to address any distress and inconvenience faced by the resident.*

    e. *Provide proof of compliance with these orders.*

Following the determination, we provided the resident with an apology, paid the additional compensation awarded, supported them with an insurance claim for damaged items, and carried out further investigations at the property. It was determined that as major work was required, it would be most appropriate to permanently move the resident.

The full report can be found here: https://www.housing-ombudsman.org.uk/decisions/oxford-city-council-202320570/

Case 202346472 – Decision of 31st October 2024

This complaint completed Stage 2 of our procedure in April 2024. The complaint to the Ombudsman was about our response to the resident's reports of repairs during the defect period, including a leak which caused damp and mould, and the resident's request for larger radiators in the property.

The Ombudsman found that there was a service failure in relation to our handling of the resident's repairs reported during the defect period, but that there had been reasonable redress with our handling of the resident's request for larger radiators.

The Housing Ombudsman issued the following orders:

- *Within 4 weeks of the date of this report, the landlord should:*

a. *Write a letter of apology to the resident.*

b. *Pay the resident £450 which is made up of the following:*
   i. *£350 offered in the final complaint response for the delays in repairs and communication issues (to be deducted if it has already paid).*
   ii. *An additional £100 for the failures identified with the response to the window reports.*
   iii. *The additional compensation should be paid directly to the resident and not offset against any debt that may be owed.*

- *Within 4 weeks of the date of this report, the landlord should:*

a. *Contact the resident to confirm if all repairs raised in this case have been completed.*

b. *Agree with the resident how it will resolve any outstanding repairs and provide a schedule of work.*

c. *Confirm arrangements to post inspect any work completed to obtain final sign off.*

- *The landlord should provide this Service with evidence to confirm it has complied with the orders above within the timescale given.*

Following the determination, an apology was sent to the resident, the compensation was offered but rejected, further property inspections were carried out, and the work relating to the damp and mould was completed.

The full report can be found here: https://www.housing-ombudsman.org.uk/decisions/oxford-city-council-202346472/

Case 202345407 – Decision of 10th January 2025

This complaint completed Stage 2 of our procedure in March 2024. The complaint to the Ombudsman was about our handling of the resident's reports of leaks within the property and damp and mould.

The Ombudsman found that we had offered reasonable redress which resolved the complaint about our handling of the reports of leaks, and that there was no maladministration in our handling of the reports of damp and mould.

Trends and challenges

National trends

Across the Housing sector, there has been an increase in complaints received over the last few years, with the Housing Ombudsman reporting accepting more than double the number of cases for investigation in 2023/24 than they did in 2021/22.

Traditionally within housing providers, most complaints have been regarding repairs and maintenance, and that has continued to be the case as it is the most common type of interaction that residents have with us as a landlord. This is true for the Council, but we have also seen an increase in the percentage of complaints about other service areas, whilst ODS have seen a large decrease in their complaints numbers.

Complaints about damp and mould have continued to increase throughout the sector, as residents are increasingly aware of the risks following the tragic death of Awaab Ishak and the subsequent scrutiny of how landlords should respond to reports of damp and mould. We would expect this to continue, especially when what is known as 'Awaab's Law' comes into effect. Whilst plans are being put in place to comply with these new requirements, the sector expects the volume of complaints about damp and mould to continue to increase due to greater awareness of the issue amongst residents and raised expectations on how it will be handled.

Our key themes

We have observed the following trends and challenges regarding the complaints received in 2024/25:

- **Damp & Mould**

Complaints about the handling of damp and mould reports have increased again slightly, with 49 of the 226 Stage 1 complaints handled by the Council including damp and mould as a main issue. This equates to 21.7%, compared to 19.4% in 2023/24. At Stage 2, 13 of the 38 cases included damp and mould as a main issue, which is 34.2% of all Stage 2 cases handled by the Council, up from 26.3% last year.

Over 33% of complaints handled by ODS where a trade was specified were regarding the plumbing and plastering categories of work, and these are the trades most involved in damp and mould cases, which is likely to have been a factor in some of those complaints.

- **Communication**

The majority of complaints received by ODS and the Council have been regarding levels of service and communication.

Communication was a factor in 120 of the 226 Stage 1 complaints handled by the Council, and in 38 of the cases handled by ODS. Meanwhile, service was identified as a main factor in 185 of the Council's cases, and in 12 of those handled by ODS.

ODS have continued to make use of their system to obtain feedback from residents immediately after a repair, and this is credited with being a large part of why their complaint levels have dropped. This improved communication means it is easier for customers to let them know about any issues promptly, before something becomes a formal complaint.

Communication was frequently one of the factors in complaints involving the Tenancy Management team, being mentioned in 49 complaints they were involved with. This is thought to be largely due to staffing issues, with some areas without a permanent Tenancy Management Officer for periods of time due to staff absence and difficulties in recruiting. The structure of Landlord Services is being reviewed, including the Tenancy Management team, and it is hoped this will lead to improved service and more consistency in staffing.

- **Repair Delays**

A significant number of complaints for ODS and Property Services included concerns about the time taken to compete repairs. Reasons for this included needing to order materials, the procurement of specialist contractors/subcontractors, waiting for a surveyor visit, or delays in getting approvals for work to proceed.

ODS have observed that the requirement for asbestos surveys can also be a factor in complaints regarding delays to repairs being carried out. There were also delays with the supply of replacement windows and doors. ODS have taken steps to address the contract management of these services.

In 2024/25 there were occasions where extreme weather conditions, including storms and high winds, impacted the Oxford area. This resulted in an increased demand for repairs. These included flooding, water ingress, and issues with drainage systems, as well as roofing and fence repairs. This sometimes resulted in residents having to wait as emergency work was prioritised.

ODS also observed that there were cases where jobs were closed down incorrectly and/or follow-on work wasn't arranged. When this occurred, it was raised with those responsible as well as management to draw attention to the impact on residents and ensure processes are followed.

There were also a number of cases where the delays were caused by the resident disputing the work planned, difficulties with gaining access to the property, or because we were unable to contact the resident.

- **New Build Properties**

We noticed an increase in complaints involving new build properties, including complaints around the reporting and repair of defects, quality of work, the end of defect period and transition from that, and communication. These complaints came from a mix of tenures (7 from tenants, 5 from shared owners, at Stage 1).

We have been working closely with OX Place to investigate these cases, advise them on our requirements in regards to complaints, and make improvements.

- **Complaint Handling**

The introduction of recording and responding to complaints using our CRM system has provided great benefits, and we are continuing to make modifications to our systems and processes to gain better insight into the types of complaints we receive and the residents we serve, as well as monitoring learning and outcomes. This should enable us to provide greater insight in annual reports moving forward, and we already have much more data available to us than we have previously.

Both ODS and the Council have had incidents during 2024/25 where complaints had been logged incorrectly so were not picked up immediately. We have worked extensively with the Contact Centre to ensure cases are logged correctly, and are satisfied this has only impacted a handful of cases.

The biggest change this year has been the considerable drop in the number of Stage 1 cases handled by the Council being responded to within the agreed timeframe. This has been due to a number of factors:

- Staffing levels unable to maintain the service during periods of staff illness and annual leave
- Periods where posts within the Customer Care & Complaints team were vacant
- Cases having been originally logged incorrectly
- The volume of complaints received, and associated enquiries (Housing Ombudsman investigations and information requests, Subject Access Requests, Freedom of Information requests, etc.)
- Staffing issues within other teams (such as Tenancy Management and Property Services) impacting our ability to respond to a complaint as we were waiting for information/action
- Occasional IT issues preventing us from accessing cases and issuing responses.

Please see the ‘Learning & service development’ section for steps we’ve taken to address these issues.

Tenant Satisfaction Measures (TSMs)

Our 2024 Tenant Satisfaction Survey (which can be found here https://www.oxford.gov.uk/downloads/file/3668/tenant-satisfaction-survey-results-report-2024) showed that of those who said they'd made a complaint, only 31% were satisfied with the handling of it. This was a small decrease from the score of 33% in the 2023, and still quite a way down on the 66% who were satisfied in the 2022 survey. It is naturally not the result that we want.

At the time of writing, we do not have Housemark's benchmarked results for Local Authorities, however last year the top quartile result was only 35%, which shows that similar organisations have been experiencing comparable levels of dissatisfaction.

Whilst we cannot always offer the outcome a complainant is looking for, we would always want them to feel that their complaint had been taken seriously, that they had been treated with empathy, and that they received a clear, thorough and timely response.

It may be that in these cases where there was dissatisfaction, they didn't feel they got the level of service they should expect or were dissatisfied with the outcome. We plan on implementing measures to ensure we get feedback from residents following a complaint so we can understand why people are dissatisfied.

The delays with our complaints handling in 2024/25 may well have contributed to some of this dissatisfaction. We have already implemented more rigorous procedures and increased staff numbers to prevent this happening again, and we have plans to work more closely with residents to understand what they are looking for from our service and their expectations.

There may also be other reasons for the low level of satisfaction with complaint handling shown in the survey. We need to ensure we are recognising complaints and logging them as such, to avoid situations where a resident may think they have made a complaint, but we don't have a record of it, as may have happened in some of these cases.

It may also be that there is often confusion around what is and isn't a complaint, so a respondent may actually have been unhappy following a report of anti-social behaviour, for example. They might term this as a complaint, but it wouldn't meet our criteria to be handled within our complaints process. Regardless, we are making improvements to try to ensure a better service is provided moving forward.

Learning & service development – what we've done in 2024/25

Whilst responding to the issues raised in a complaint is important, ensuring we learn from them is also a priority. Many people who contact us with a complaint ask for assurances that we will make improvements so something positive can come out of their experience. Learning from complaints is not just our statutory duty, it is a commitment we make to citizens that they will be heard, and their views will help shape our services.

Some of the measures below were implemented as a direct result of a complaint, others were already being considered but formed part of the assurances we have been able to provide to complainants at the point of resolution.

Landlord Services Customer Care & Complaints Team

Following the changes in Housing Ombudsman Complaint Handling Code that came into effect on 1st April 2024, in 2024/25 we continued to make changes in how we handle complaints about our landlord function. We worked on these changes with colleagues who handle complaints within ODS and those within the Council who handle non-landlord function related complaints to ensure a consistent approach.

- We have continued to work on our letters, to ensure they are free from jargon, that the tone is professional but accessible, and that all the required information is included.

- In collaboration with the Ombudsman Link Officer, we have made improvements to how we submit evidence to the Ombudsman to ensure our submissions are thorough and timely.

- An additional Customer Care & Complaints Officer post was created so that we can meet demand for our services. These interviews took place within 2024/25, with the Officer commencing their new role in April 2025. The Tenant Ambassadors provided feedback on the candidates which was taken into account when assessing who should be offered the role.

- We have worked with the Contact Centre to provide better insight and understanding into where complaints should be directed, how to recognise and log them, the information required, and steps they can take prior to the complaint being received by the relevant complaints 'hub'.

- We were part of a project to design and implement Robotic Process Automation (RPA) for complaints forms submitted via our website. This means that following an initial review, these can be entered onto our system automatically.

- A centralised Sharepoint has been created for storing evidence related to complaints, reducing the risk of losing information should a staff member leave or be off work. These files can only be accessed by those with a

responsibility for handling or overseeing complaints, and the information will only be retained in accordance with our Data Retention Schedule.

- We have continued to adapt how we record data on our system and our reporting functionality, and this is an ongoing project. We have already made improvements that have enabled us to provide more detailed insight in this report this year.

- We have continued to work closely with ODS, feeding back on outcomes from investigations and identifying areas for improvement. We frequently collaborate on complaints, and we have established greater clarity on what is best handled by ODS on our behalf, and what should be investigated by the Council directly.

- We have attended training on supporting residents and staff with compassion fatigue, appropriate compensation and remedies, as well as Housing Ombudsman webinars. We have continued to complete Housing Ombudsman e-learning courses to ensure we are following best practice. The Customer Care & Complaints Manager has also attended the quarterly meetings of a group made up complaints managers from various Local Authorities and Housing Associations where we discuss challenges and best practice.

- The Customer Care & Complaints team have continued to work closely with colleagues in other teams, providing support, advice, and education around the complaints process. We have also worked more closely with OX Place than we have in previous years.

- We have worked with colleagues handling insurance claims to better understand how we can work together and have supported residents in making a claim, when necessary.

- We have continued to report to the Housing & Homelessness Panel on our progress.

Property Services

- Area Property Officers have been introduced. Each Officer is dedicated to an area within Oxford and are the first point of contact for the investigation of Stage 1 complaints relating to Property Services.

- The number of specialist Damp & Mould Surveyors has been increased to ensure that they can address more severe cases quickly.

- Templates for reports on damp and mould have been designed and are used by our Surveyors to ensure that the relevant information is recorded.

- Improved tracking of damp and mould cases, using both our CRM system and spreadsheets.

ODS

- ODS have been working closely with their Planners and the Contact Centre to improve communication with residents and internally. This included encouraging the Contact Centre to speak to them directly when necessary and making use of Teams to send urgent messages.

- ODS have expanded the use of their messaging system for appointments. As well as getting a text (or automated message on a landline) when the appointment is booked, a reminder is sent on the day of the appointment, and a further message when the operative is on their way. The resident can also contact the operative directly and provide feedback once the work is done. Use of this system began prior to April 2024, but it's use has since been extended across their responsive repairs team, resulting in fewer complaints and reducing appointments with no access by more than 20%.

- Those handling complaints within ODS have also been working with their colleagues to embed a positive complaint handling culture and a greater understanding of the Ombudsman's requirements. This has resulted in quicker response times for the cases they investigate.

- There is now improved cooperation and communication regarding complaints between ODS and various departments within the Council, notably Property Services and Tenancy Management.

- The complaints 'hub' within Landlord Services and the 'hub' within ODS have worked together to better identify what complaints belong with ODS and which would be better handled by the Council. ODS also feel they now have greater clarity on what is a complaint and what is a service request, which enables them to handle them appropriately, which has contributed to their reduced complaint numbers.

- Issues with accessing a property, especially in regards to damp and mould or where there is a health and safety concern, are flagged up to Property Services and Tenancy Management.

OX Place

- For consistency and improved communication, it was agreed that residents in new build properties would have a single point of contact within the Council (the New Homes Officer), who would then liaise with OX Place as necessary.

- Amendments have been identified for future versions of the Home User Guide, especially around timescales for repairs following the defect period.

Home Ownership

- Our website has been updated to ensure we are providing clear and accurate information.

- With the assistance of the Tenant Ambassadors, the letters sent out to shared owners regarding service charge estimates and actuals have been amended to provide clearer information. This was done on a trial bases with the actuals and extended to all shared owners when the estimates were sent out in February.

Tenancy Management

- Arrangements have been for the Customer Care & Complaints team to share any vulnerabilities or disabilities disclosed by tenants with the Tenancy Management team so these can be recorded on our system, ensuring our records are up-to-date and we can tailor our services accordingly.

- There is increased collaboration between Tenancy Management Officers, Area Property Officers and ODS, especially in situations where we are struggling to access a property to carry out work.

Contact Centre

- Further work has been done with the Contact Centre on recognising complaints, establishing where they should be directed, and logging them correctly.

- Staff within the Contact Centre are now empowered to take steps to address issues at the first point of contact when a resident is making a complaint by telephone. This may include ordering a repair, making an appointment or asking for a Damp & Mould Surveyor to visit.

Plans for 2025/26 and beyond

As of 1st April 2024, the new version of the Housing Ombudsman's Complaint Handling Code came into effect, alongside new statutory powers for the Ombudsman. In conjunction with new regulatory standards, the focus is on ensuring complaints are handled appropriately and that the customer's voice is heard and is stronger than ever. The expectations for us as a landlord are high, and we will do everything we can to meet those, not just in terms of our handling of complaints but how this results in improvements to our services.

The volume of complaints has increased as residents become increasingly aware of their rights, and as we continue to create an environment where complaints are recognised, recorded and welcomed as an opportunity to put things right.

Many organisations find that as confidence in their ability to competently handle complaints increases, so does the volume they receive, without there having been any change in the level of service. Therefore, we don't see this increase as a negative thing, but an opportunity to better understand the expectations of our residents and as evidence we are facilitating that communication.

We don't want to see anyone dissatisfied with our services, but we appreciate it when residents get in touch and give us the chance to put things right or explain why we are unable to offer what they are looking for.

The increase in complaints numbers, more stringent regulation, and strict timescales does present challenges we will need to face. We will need to make sure we are well-resourced, both in terms of staff and systems, to meet these challenges.

Many of the plans we set out last year for 2024/25 have had to be postponed as we handled the challenges of an increased volume of complaints and low staff numbers. With an increased capacity within the Customer Care & Complaints team, we hope to make further progress on these this year.

Our plans for 2025/26:

- Our wider review of our Tenant Involvement Strategy will include looking at ways of involving residents more in our complaints process so that we are providing a service that meets not just the requirements of the Housing Ombudsman, but of the people it is intended to help. We are also looking to include our involved residents in identifying trends and learning from complaints and monitoring our progress on this. This will provide additional insight and increase our accountability. The intention is for a panel of residents to be formed and meet quarterly to review complaints data.

- We will further develop how we use our IT systems to monitor complaints, the outcomes, and report on complaints. This includes ensuring senior management have visibility of the data so they can identify areas of focus for improvement. It will also ensure greater accountability.

- We are looking at what measures we can implement to gain better insight into the themes of complaints so we can identify trends and emerging issues more quickly and efficiently and ensure the complaints data is used and reflected in strategic work e.g. our Asset Management Strategy.

- We have plans for developing a compensation policy/procedure for complaints, in conjunction with our residents.

- We are exploring how we can best seek feedback from residents following their complaint so we can measure their satisfaction with both the process and the outcome and use their comments to make improvements.

Closing remarks from the Customer Care & Complaints Manager

This has clearly been a year of challenges regarding complaints. I would like to begin by apologising to residents for the delays they may have experienced. This is not the level of service you should be able to expect or that we want to provide, and it does not reflect our commitment to providing an efficient, empathetic service that adheres to the Housing Ombudsman's requirements. We have recruited additional staff in both the Customer Care & Complaints team and other teams we work with, and we have amended our processes to try to ensure we provide you with a better service in future. Many of our complainants have been very understanding and gracious during this time, despite sometimes facing difficult situations themselves, and as well as my apologies I would like to offer my thanks for this.

We have had to continue to adapt to accommodate the increased numbers of complaints, and we will continue to do so. Whilst I am never happy that any resident has cause to complain, I am pleased that we are capturing these expressions of dissatisfaction more accurately than ever and recognising them as complaints. I am grateful for all of those who have taken the time to share their experiences and thoughts with us and have given us the opportunity to put things right. We can't always offer the outcome a resident is looking for, but we can ensure that their opinion is heard and valued, give it full consideration, and explain our decisions. Whilst too many complaints have been responded to out of target, I sincerely hope we were able to offer a fair resolution in the end.

More positively, ODS' expanded use of technology to improve communication and seek timely customer feedback has seen a reduction in complaints about their work. We have also continued to work more closely together to provide a consistent, compliant approach to complaints handling.

Lucy McCormack, Complaints & Quality Assurance Manager at ODS, has said:

"*ODS Building Services has seen a reduction in complaints in the 2024/2025 year, however, the key themes around service in general is something we continue to address. We are using technology more than ever before to improve communications & retrieve customer feedback in real-time, and continue to include our Operational staff in improvements in this area.*"

We've also seen an increase in Housing Ombudsman investigations into complaints that residents have escalated to them. Residents are increasingly aware of their right to complain and to have our response reviewed by the Ombudsman if they remain dissatisfied once the complaint has completed our internal process. We welcome the Ombudsman's thoughts on these cases, as it helps inform future decisions and ensure we align our service with their expectations. In many of the cases from 2024/25, we had already identified failings and service improvements prior to the Ombudsman's determination and made the necessary changes to how we work. Ensuring we learn from complaints is one of the most important objectives of the Customer Care & Complaints team.

My goals for this year are focused on increasing satisfaction with our service, through:

- Ensuring we respond to complaints promptly, providing fair and thorough responses
- Engaging with residents about their experiences throughout the complaints process, as well as collaborating with colleagues in Tenant Involvement to work with residents to drive service improvement
- Reviewing and modifying our processes to ensure we have robust practices to ensure service continuity when challenging circumstances arise.

I am hoping that in next year's report we will be able to demonstrate our progress on these plans, as well as improved response times. I would like to thank our residents and colleagues for their patience and support during a challenging year, and give my assurances that we will always strive to do better.

Kat Mayes

Customer Care & Complaints Manager (Landlord Services)

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is defined within our Comments, Compliments and Complaints procedure. The section titled *'What is a complaint?'* specifies: *'A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Council, its staff, or those acting on behalf of the Council, affecting an individual citizen or group of citizens.'*
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Our residents do not have to use the word 'complaint' for it to be treated as such. This is defined within our Comments, Compliments and Complaints procedure. The section titled '*Who can make a complaint'* specifies: *'The Council will accept complaints from anyone who*

				has used or been affected by a service provided by or on behalf of the Council. The Council will also accept complaints from anyone who is acting on behalf of a service user with their knowledge and consent.'
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is defined within our Comments, Compliments and Complaints procedure. In section titled *'What is a service request?'* it states: *'Complaints and service requests can be closely related. A service request is a request for a service made for the first time, where it couldn't be reasonably expected that this should already have been actioned.* *When assessing whether to treat a contact as a complaint or a service request each case will be considered on its individual merits, and consideration may be given to the following factors. This list is not exhaustive:* • *Whether the customer*

				has been made aware of the complaints procedure and has identified their contact as being a complaint • *What the expression of dissatisfaction is about* • *The tone of the correspondence* • *What the customer would like to happen next* • *Whether the matter has already been treated as a service request'* As a landlord we recognise the difference between a service request and a complaint. We follow the Housing Ombudsman definition on this matter.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Comments, compliments and complaints procedure | Oxford City Council	As per our Comments, Compliments and Complaints procedure, we will consider '*Whether the matter has already been treated as a service request'*. Front line staff are trained to recognise expressions of dissatisfaction as potential

				complaints, empowered to offer to log them as such, and staff are aware that a complaint being logged should not prevent any immediate actions being taken or delay anything already in progress.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes		Residents completing surveys through our website are provided with the link to the part of our website with details on how to make a complaint. Staff carrying out consultations and events with residents are aware of how to recognise complaints and encouraged to advise residents of how they can make a complaint or take the details and pass them to the Customer Care & Complaints team. We also gather real-time transactional satisfaction performance on completion of repairs & gas servicing, with direct interventions by team leaders/planners where satisfaction is less than required.

				Residents completing our STAR survey were provided with the details on how they can make a complaint if they wish to do so.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Comments, compliments and complaints procedure | Oxford City Council	Our Comments, Compliments and Complaints procedure details what we may not accept as a complaint and provides alternative avenues for these issues where possible. When a complaint is not accepted, the resident is formally advised of this in writing, with the reason(s) why, and provided with the contact details for the Housing Ombudsman.
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is set out in our Comments, Compliments and Complaints procedure in the section titled '*What will not be treated as a complaint under this procedure'*.

	months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.			
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is detailed in our Comments, Compliments and Complaints procedure. The decision to decline to investigate a complaint is made by the Customer Care & Complaints Manager and is only done on the grounds of time limits when the length of time that has passed means we would be unlikely to be able to obtain the evidence to conduct a fair and thorough investigation.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to	Yes	https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report	When a complaint is not accepted, the resident is formally advised of this in writing, with the reason(s) why, and provided with the

	the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.			contact details for the Housing Ombudsman. The number of complaints rejected and the reasons for this are recorded, monitored and reported on in our Annual Complaint Handling & Service Improvement report.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is set out in our Comments, Compliments and Complaints procedure in the section titled '*What will not be treated as a complaint under this procedure'*.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is set out in our Comments, Compliments and Complaints procedure, in the section *'Reasonable Adjustments':* *'Anyone is welcome to make a comment, compliment or complaint and the Council is committed to treating everyone fairly. If a complainant requires any particular assistance they are advised to let the Council know and state what assistance is required. This may include, for example, the provision of information in alternative formats (e.g. large print), the use of a language service, or communication through a representative.'*
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to	Yes		Our Comments, Compliments and Complaints procedure provides contact details for residents to raise complaints

	pass details of the complaint to the appropriate person within the landlord.			via the internet, by telephone, or in writing. It also advises they can make them directly to the relevant service. We accept complaints made to any member of staff. Training is regularly carried out to make staff aware of the complaints process, and everyone has the option to log the complaint themselves or pass the information on to the Customer Care & Complaints team.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Comments, compliments and complaints – Oxford City Council Complaints against us as a landlord | Oxford City Council	Staff are encouraged to recognise potential complaints and offer to log them as such. The complaints pages, both general and housing-specific ones, can easily be found on our website by entering 'complaints' into the search bar. The complaints service and how to make a complaint is regularly featured in our Tenants In Touch magazine sent quarterly to residents.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is published on our website.

	will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.			Residents are also made aware of timescales and what happens at the stage they are at in complaint acknowledgement and outcome letters.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Comments, compliments and complaints procedure | Oxford City Council Complaints about council housing – Oxford City Council	Our Comments, Compliments and Complaints procedure has a section titled *'Ombudsman'*. We also have a page on our website that includes our self-assessment and annual report. Contact details for the Ombudsman (including a website address) is included with all formal complaint letters.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is detailed in our Comments, Compliments and Complaints procedure, in the section titled *'Who can make a complaint?'*
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Our Comments, Compliments and Complaints procedure has a section titled *'Ombudsman'*. Contact details for the

				Ombudsman (including a website address) is included with all formal complaint letters.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Within Landlord Services there is a complaints 'hub' made up of the Customer Care & Complaints Manager, and Customer Care & Complaints Officers. The hub takes responsibility for the investigating, resolving and responding to complaints, and monitoring actions and service improvement. Along with the Ombudsman Link Officer, the Customer Care & Complaints Manager liaises with the Ombudsman. The Customer Care & Complaints Manager is responsible along with senior management withing Landlord Services for reporting to the governing body.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and	Yes		Those within the complaints hub are empowered to approach all necessary staff to

	autonomy to act to resolve disputes promptly and fairly.			gather evidence and progress actions. Decisions on whether a complaint is upheld or not, remedies, and compensation are made by those in the hub.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes		Staff within the complaints hub undergo regular training via the Housing Ombudsman website and other providers. We provide guidance and training to staff within other teams around complaints. As of January 2025, we are recruiting an additional Customer Care & Complaints Officer.

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Comments, compliments and complaints procedure | Oxford City Council	We have a single complaints procedure that is compliant with the Code. Those within the complaints hub ensure that customers are not treated differently by others if they complain, and there is a

				process in place to ensure fair investigation should someone wish to complain about their treatment by someone handling their complaint.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Comments, compliments and complaints procedure | Oxford City Council	We make every effort to ensure actions are completed prior to the complaint outcome letter being sent, and monitor outstanding actions when this is not possible. When a complaint is made via our Contact Centre, the officers have been trained to make any necessary arrangements for repairs etc prior to the investigation beginning. We have two complaint stages and treat anything that meets the definition of a complaint as such, providing the resident agrees to this.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Our procedure has only 2 stages.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a	Yes		ODS (Oxford Direct Services) is a wholly owned company of

	contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			Oxford City Council. They follow our two stage process.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		ODS (Oxford Direct Services) is a wholly-owned company of Oxford City Council. They follow our two stage process. They share reports with us, seek advice, and we work collaboratively to ensure we are consistent and compliant.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes		We seek clarification where necessary, and all complaints include the complaint definition in the acknowledgement letter with a prompt for the customer to let us know if anything is incorrect or missing. When the customer has further comments that alter the definition, we issue an amended acknowledgement letter.
5.7	When a complaint is acknowledged at either stage, landlords must be clear	Yes		The acknowledgement letter

	which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.			contains this as part of the complaint definition. Any issues that cannot be considered within the complaint are identified as such.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes		Those working within the complaint hub are empowered to act independently, seek to fully understand the resident's situation and the impact on them, and carries out a thorough investigation, taking expert advice from colleagues where necessary, resulting in an evidence-based conclusion. If staff have previously been involved, the case handler will request an additional and/or more senior review of the situation. Staff handling complaints are able to challenge colleagues and contractors if they feel it is necessary and can escalate concerns to their manager. Letters written by the Customer Care & Complaints Officers are reviewed by the Customer Care & Complaints Manager.
5.9	Where a response to a complaint will fall	Yes		

	outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.			Any extensions to timescales are confirmed in writing and a new target date given. Complainants are provided with the direct contact details of the person handling their complaint.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is covered by the *'Reasonable Adjustments'* section of our Comments, Compliments and Complaints procedure.
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Our Comments, Compliments and Complaints procedure sets out the reasons we may not accept a complaint. Any refusal to escalate would be confirmed in writing with the reasons given. Our complaint outcome letters all provide information on how to escalate to the next stage of the process.
5.12	A full record must be kept of the complaint, and the outcomes at each	Yes		Complaints are recorded on our CRM system, and all

	stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			outgoing letters are saved to this. Other documents are saved centrally to a folder accessible by the complaints hubs.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is detailed in our *'How will complaints be dealt with?'* section of our Comments, Compliments and Complaints procedure.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Comments, compliments and complaints procedure | Oxford City Council https://www.oxford.gov.uk/comments-compliments-complaints/procedure-managing-vexatious-customers	This is included in our Comments, Compliments and Complaints procedure, in the sections titled *'Reasonable and Unreasonable Behaviour'* and *'Managing unreasonable behaviour and vexatious complaints'*. It is also covered by our Procedure for Managing Vexatious Customers.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard	Yes	https://www.oxford.gov.uk/comments-compliments-complaints/procedure-	See point 4.2 of our Procedure for Managing Vexatious

	for the provisions of the Equality Act 2010.		managing-vexatious-customers	Customers.

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes		Every effort is made to resolve complaints at the earliest opportunity, having due regard to the complexity of the case, and any urgent issues are dealt with in a timely manner before the complaint response is sent out.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.	Yes	Comments, compliments and complaints procedure | Oxford City Council	As per our Comments, Compliments and Complaints procedure, stage 1 complaints are acknowledged within 5 working days of the complaint being received.
6.3	Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.	Yes	Comments, compliments and complaints procedure | Oxford City Council	As per our Comments, Compliments and Complaints procedure, stage 1 complaints are responded to in full within 10 working days of the complaint being acknowledged,

				excluding where an extension is required.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Any extensions to timescales are confirmed in writing and a new target date given. The reason for the extension is explained in the letter.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes		We provide the contact details for the Housing Ombudsman in our extension letters, as well as in all other formal correspondence relating to a complaint.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		Outstanding actions are detailed in our complaint outcome letters, alongside timescales for completion when appropriate. These actions are monitored by the complaint handler, and the case is kept open on our CRM system in a 'monitoring' state until it has been confirmed that all agreed actions have been completed.

6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes		Our letters address all points raised, provide reasons for decisions, and reference policy, law, the Ombudsman Code, etc, when relevant. Letters from the Customer Care & Complaints Officers are checked by the Manager to ensure this.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes		Prior to the acknowledgement letter being sent, we will add any additional issues raised to the complaint. After that point, we will include any related issues that are raised and will apply an extension if necessary to address these. Any non-related issues that are raised after the acknowledgement letter has been sent will be considered and if they meet the criteria of a complaint, a new stage 1 will be logged to address them.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage;	Yes		Our complaint outcome letters are modelled on the Ombudsman's template, and

	b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			include all of the required information.

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Comments, compliments and complaints procedure | Oxford City Council	The right to escalate to stage 2 as the final stage is detailed in our Comment, Compliments and Complaints procedure, as well as in the stage 1 outcome letters.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Comments, compliments and complaints procedure | Oxford City Council	As per our Comments, Compliments and Complaints procedure, stage 2 complaints are acknowledged within 5 working days of the escalation being requested.
6.12	Residents must not be required to	Yes	Comments, compliments and	

	explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		complaints procedure | Oxford City Council	Whilst we may ask for guidance from the complainant regarding what they consider to be outstanding and what outcome they are seeking, if this is not forthcoming we will proceed with the Stage 2 investigation and review the complaint in its entirety.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Comments, compliments and complaints procedure | Oxford City Council	The Customer Care & Complaints Officer will handle a complaint at stage 1 and will investigate with colleagues from other teams. At stage 2, the Customer Care & Complaints Manager will consider the complaint, and wherever possible look to review evidence with more senior colleagues than those involved at stage 1.
6.14	Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.	Yes	Comments, compliments and complaints procedure | Oxford City Council	As per our Comments, Compliments and Complaints procedure, stage 2 complaints are responded to in full within 20 working days of the complaint being acknowledged, excluding where an extension is required.

6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Comments, compliments and complaints procedure | Oxford City Council	Any extensions to timescales are confirmed in writing and a new target date given. The reason for the extension is explained in the letter.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes		We provide the contact details for the Housing Ombudsman in our extension letters, as well as in all other formal correspondence relating to a complaint.
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes		Outstanding actions are detailed in our complaint outcome letters, alongside timescales for completion when appropriate. These actions are monitored by the complaint handler, and the case is kept open on our CRM system in a 'monitoring' state until it has been confirmed that all agreed actions have been completed.
6.18	Landlords must address all points raised in the complaint definition and provide	Yes		Our letters address all points

	clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.			raised, provide reasons for decisions, and reference policy, law, the Ombudsman Code, etc, when relevant.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes		Our complaint outcome letters are modelled on the Ombudsman's template and include all of the required information.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Staff investigating complaints are empowered to approach all staff members necessary to gather evidence and gain an understanding in order to provide a thorough response.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is detailed in our Comments, Compliments and Complaints procedure, in the section *'How will complaints be dealt with?'*. Actions taken are detailed in the outcome letter, along with Next Steps for anything outstanding, and service improvements already identified at that stage. These are monitored within the complaint hub until completion.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes		We seek to gain an understanding of the impact of any service failure and consider this when offering remedies.
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes		Actions taken are detailed in

	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			the outcome letter, along with Next Steps for anything outstanding, and service improvements already identified at that stage. These are monitored within the complaint hub until completion. Cases with outstanding actions remain open on our CRM system for monitoring.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes		We agree on remedies in consultation with the Ombudsman's published advice on remedies and compensation.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	https://www.oxford.gov.uk/complaints-council-housing	Our Annual Complaints Performance & Service Improvement report contains this information. The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on 16th October 2024. It was not possible to collate the end of year data and produce the report and present it to cabinet sooner due to the scheduling of their meetings. The report and governing body response have now been published. We intend to have the 2025 Annual Complaints Performance & Service Improvement report published by 30th June 2025.

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	https://www.oxford.gov.uk/complaints-council-housing	The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on 16th October 2024. It was not possible to collate the end of year data and produce the report and present it to cabinet sooner due to the scheduling of their meetings. The report and governing body response have been published. We intend to take the 2025 report to Cabinet on 11th June 2025, and have their response ready to be published by 30th June 2025.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		We carry out the self-assessment annually and are committed to additional reviews should there be a significant restructure, merger and/or change in procedures.
8.4	Landlords may be asked to review and update the self-assessment	Yes		We comply with all requests from the Ombudsman.

	following an Ombudsman investigation.			
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes		If this situation did occur and we were unable to comply with the Code, then we would be committed to inform the Ombudsman and the affected complainants and publish this on our website with the appropriate timescales for the reconvening of the service.

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report#section6	We publish details of service improvements as part of our annual complaint performance and service improvement report. Identifying service improvements is considered an important part of a complaint investigation. The complaints hub liaises with the relevant department when trends are identified to examine possible improvements.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes		Complaints are regularly discussed in meetings and training sessions, including the benefits to the organisation of the information and opportunities they provide. The complaints hub encourages a positive

				approach to complaints within the organisation and build productive relationships with other teams in order to have open, well-informed discussions on resolutions and learning. We believe complaint investigations, resolution, and service improvements are best achieved through positive collaboration and clear ownership of issues.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	https://www.oxford.gov.uk/complaints-council-housing/annual-housing-complaint-performance-service-improvement-report#section6	Learning and improvement from complaints is reported as part of the Annual Complaints Performance & Service Improvement report. This is available on our website. This report is presented to the governing body annually. Information regarding complaints is regularly featured in our tenant newsletter. Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee). Minutes and

				reports from these meetings are published on our website. We are currently exploring the best format for involving residents more with complaints and service improvements, with a view to forming a panel to discuss our approach, improvements, and trends.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes		The Customer Care & Complaints Manager assesses themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. This is done in collaboration with the Customer Care & Complaints Officers, the complaints hubs handling non-housing related complaints, and management from other teams. The Landlord Services Manager has accountability for complaints handling.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support	Yes		The Leader of Oxford City Council is responsible for complaints in their Cabinet portfolio.

	a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes		Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee). The MRC has access to this information and can approach staff at any point for further information. We will look to implement quarterly reporting to the MRC to ensure we are more proactively sharing information.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in	Yes		Complaints performance and learning is reported to the Housing & Homelessness Panel (of the Scrutiny Committee). The 2024 Annual Complaints Performance & Service Improvement report was presented to the Housing & Homelessness Panel (Panel of the Scrutiny Committee) on 10th October 2024 and Cabinet (Governing body) on

	complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.			16th October 2024. We intend to take the 2025 report to Cabinet on 11th June 2025.
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Comments, compliments and complaints procedure | Oxford City Council	This is all reflected in our Comments, Compliments and Complaints procedure. This approach is also regularly reinforced internally through training and communication, overseen by the Customer Care & Complaints Manager.

Annual Complaint Performance & Service Improvement Report 2024/25 (Landlord Services) – Governing Body Response

As a Cabinet, we once again welcome the publication of this report as part of our commitment to transparency and our determination to ensure the views of citizens help shape our services.

The Customer Care & Complaints team within Landlord Services has faced capacity problems in 2024/25, resulting in the published figures around response times for complaints. We're pleased to note that action has already been taken to increase staff in this area and work is being closely monitored, we expect to see a marked improvement in this area as we progress into 2025/26, alongside an increase in customer satisfaction with our handling of complaints.

We also note the service improvements that have been made throughout the Council and by our contractor, ODS, and will be interested to see the longer-term impact of these on the complaints figures for 2025/26.

The Housing Ombudsman determinations are an interesting addition to this year's report, as there were none for last year other than the Complaints Handling Failure Order that the Council regrettably received. Whilst we would like to see a mutually agreed resolution to complaints as early as possible within the process without Ombudsman intervention, these determinations provide a valuable external review of our complaints service and inform us as to whether the Council is meeting the Housing Ombudsman's expectations.

This year's report includes some of the further insight into the types of complaint received and the root causes that we requested last year. We expect this to continue and for opportunities for deeper analysis to be explored.

Our residents are at the heart of our services, and the plans to expand their involvement in the complaints service and seek their feedback will be a welcome step towards greater transparency, accountability, and co-regulation.

Although parts of this report are not positive, such as the percentage of complaints responded to within target and the findings of maladministration by the Housing Ombudsman, there has also been positive progress in several areas. We accept the assurances given that steps have been taken to address issues, and we expect to see evidence that these have succeeded by the time the next annual report is produced.

We would like to thank all of those within to Council who have assisted with the investigation and resolution of complaints, as well as all of the citizens who have taken the time to raise issues and provide their views.

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To:	**Cabinet**
Date:	18th June 2025
Report of:	Director Property & Assets
Title of Report:	Long Leasehold disposal of City Centre Commercial Property – 9, 10, 16a & 16b Ship Street and 10 St Michaels St, Oxford

Summary and recommendations	
Decision being taken:	To seek approval for the long leasehold disposal of 9, 10, 16a & 16b Ship Street and 10 St Michaels, properties owned by the City Council
Key decision:	Yes https://mycouncil.oxford.gov.uk/mgIssueHistoryHome.aspx?IId=39655&PlanId=523&RPID=35215257
Cabinet Member:	Councillor Ed Turner, Deputy Leader and Cabinet Member for Finance & Asset Management
Corporate Priority:	Well Run Council
Policy Framework:	Medium Term Financial Plan

Recommendation(s): That Cabinet resolves to:

1. **Approve** the long leasehold disposal of 9, 10, 16a & 16b Ship Street and 10 St Michaels these properties as set out in the report.
2. **Delegate** authority to the Director Property & Assets in consultation with the Deputy Leader and Cabinet Member for Finance & Asset Management, the Director of Law, Governance & Strategy and the Group Finance Director the agreement of the detailed terms for the disposal and to enter into all necessary documentation to effect the disposal on the basis that the terms comply with s.123 of the Local Government Act 1972, where powers are not already delegated within the constitution.

Information Exempt From Publication	
Confidential Report	This information is exempted from publication under Schedule 12A to the Local Government Act 1972 since it is: Information about someone's finances or business

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Location Plans 1 & 2	No
Appendix 2	Confidential Report	Yes This information is exempted from publication under Schedule 12A to the Local Government Act 1972 since it is: Information about someone's finances or business
Appendix 3	Risk Register	No

Introduction and background

1. Oxford City Council owns the freehold interest in 9, 10, 16a and 16b Ship Street and 10 St Michaels Street. The plans in Appendix 1 show the properties edged in red together with Oxford City Council's freehold ownership outlined in blue. This ownership is situated within a Conservation Area.
2. These properties were recently offered to the market on the basis of a proposed long leasehold disposal. A number of interested parties came forward and a best bids process was undertaken.
3. Approval is sought to the outline terms and to delegate authority to agree the detailed terms for the sale, final form of documents and enter the transaction.
4. Appendix 2 to the report is confidential as it contains commercially sensitive information.

Proposal

5. The proposal is to dispose of the long leasehold (125 year) interest in these properties to secure a capital receipt. Details are provided in the confidential appendix attached to the report.

Alternative Options Considered

6. The following alternative options were considered:
    a. Market the properties for shorter occupational leases. This option would require expenditure by the Council prior to marketing and would also have an extended timescale to achieve income with planning requirements and tenant incentives. Further, demand for shorter leases would be uncertain. This option was therefore rejected.
    b. Freehold disposal. The properties are situated within a wider City Council ownership block and this option would remove the ability for any potential future long term strategic proposals. There would also be negligible additional value for a capital receipt on a freehold disposal. This option was therefore rejected.

Financial implications

7. The disposal of these properties will provide a capital receipt to reduce borrowing and support the Council's Medium Term Financial Plan. The detailed terms are in Confidential Appendix 2, being commercially sensitive.

Legal issues

8. Section 123 Local Government Act 1972 empowers a local authority to dispose of property, by way of lease or sale. The disposal of property cannot be for a consideration less than the best that can be reasonably obtained unless consent of the Secretary of State is obtained. The proposal is in line with S.123 requirements.
9. The delegated officer decision is also on the Forward Plan. See link:
    a. Issue details - Officer Decision to dispose of the long leasehold interests in 9, 10, 16a & 16b Ship Street and 10 St Michaels Street | Oxford City Council

Level of risk

10. The risk register is attached in Appendix 3.

Equalities impact

11. The financial benefit to the City Council will help provide services, notably those in line with the City Council's ambition to create a more equal city.
12. The disposal of these properties does not give rise to any direct equalities' issues. Therefore, an Equalities Impact Assessment is not necessary.

Carbon and Environmental Considerations

13. This report does not give rise to any direct carbon or environmental considerations.

Conclusion

14. The Council is looking at all options to manage its budget in the Medium-Term Financial plan, and the disposal of these properties will generate a capital receipt that will support the Council's financial position.

Report author	Bill Wilberforce
Job title	Disposals Surveyor
Service area or department	Corporate Property
Telephone	07483 011293
e-mail	bwilberforce@oxford.gov.uk

Background Papers: None

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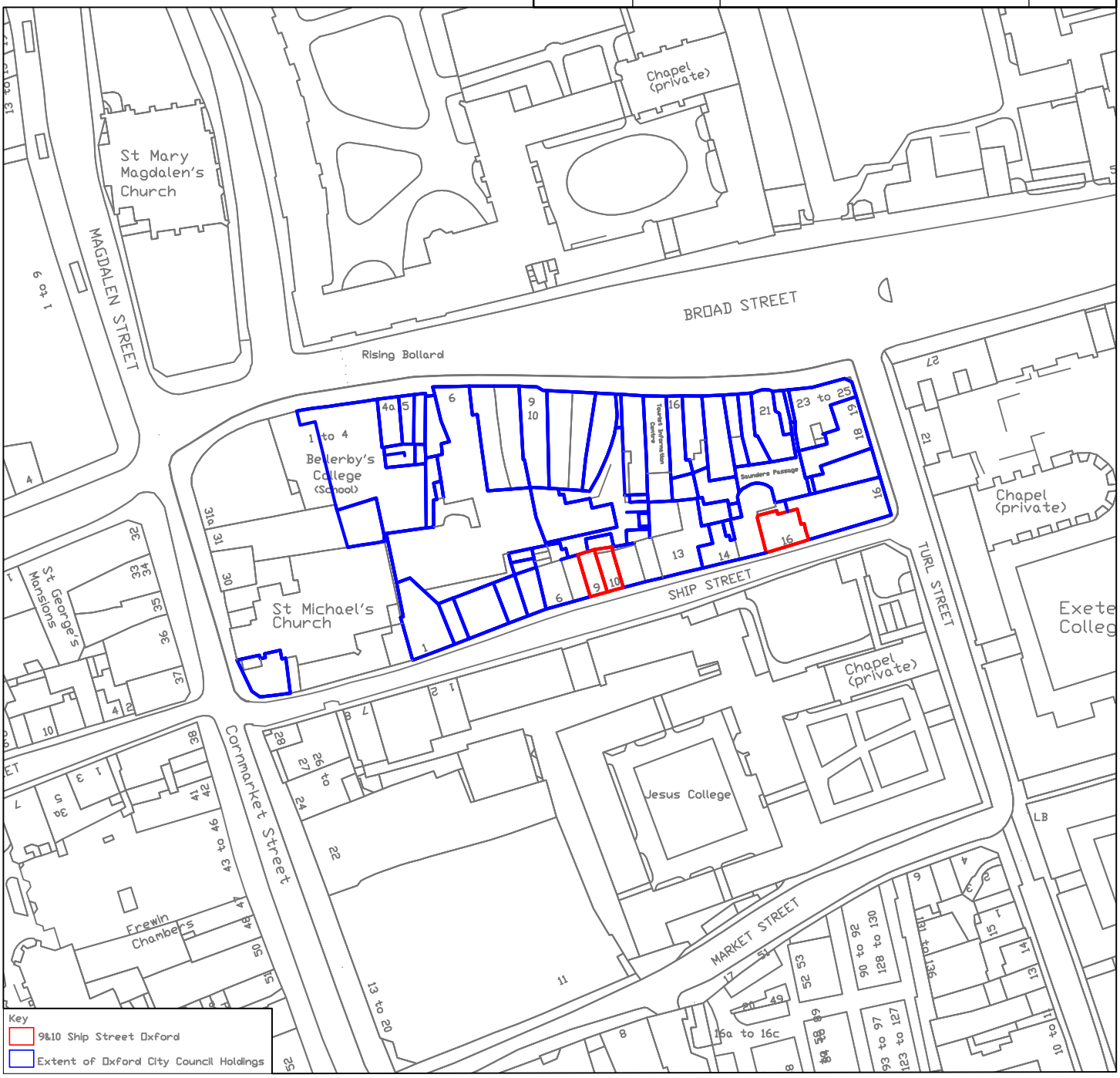

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Oxford City Council
Housing & Property Services
Building Design & Construction
St Aldate's Chambers
St Aldate's
OXFORD
OX1 1DS

Tel. 01865 249811
DDI. 01865 25****

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OXFORD CITY COUNCIL

PROJECT TITLE
9, 10 and 16 Ship Street, Oxford OX1 3DA

DRAWING TITLE
Plan 1

939

DRAWN BY	CHECKED BY	APPROVED BY
T.Evans	J.Axford	
DATE 16/04/2025	DATE 16/04/2025	

SCALE	STATUS
1/1250 @ A4	Lease Plans

DRAWING NUMBER/ SHEET NUMBER	REVISION
BDC5010/SMS/9/10/01	**A**

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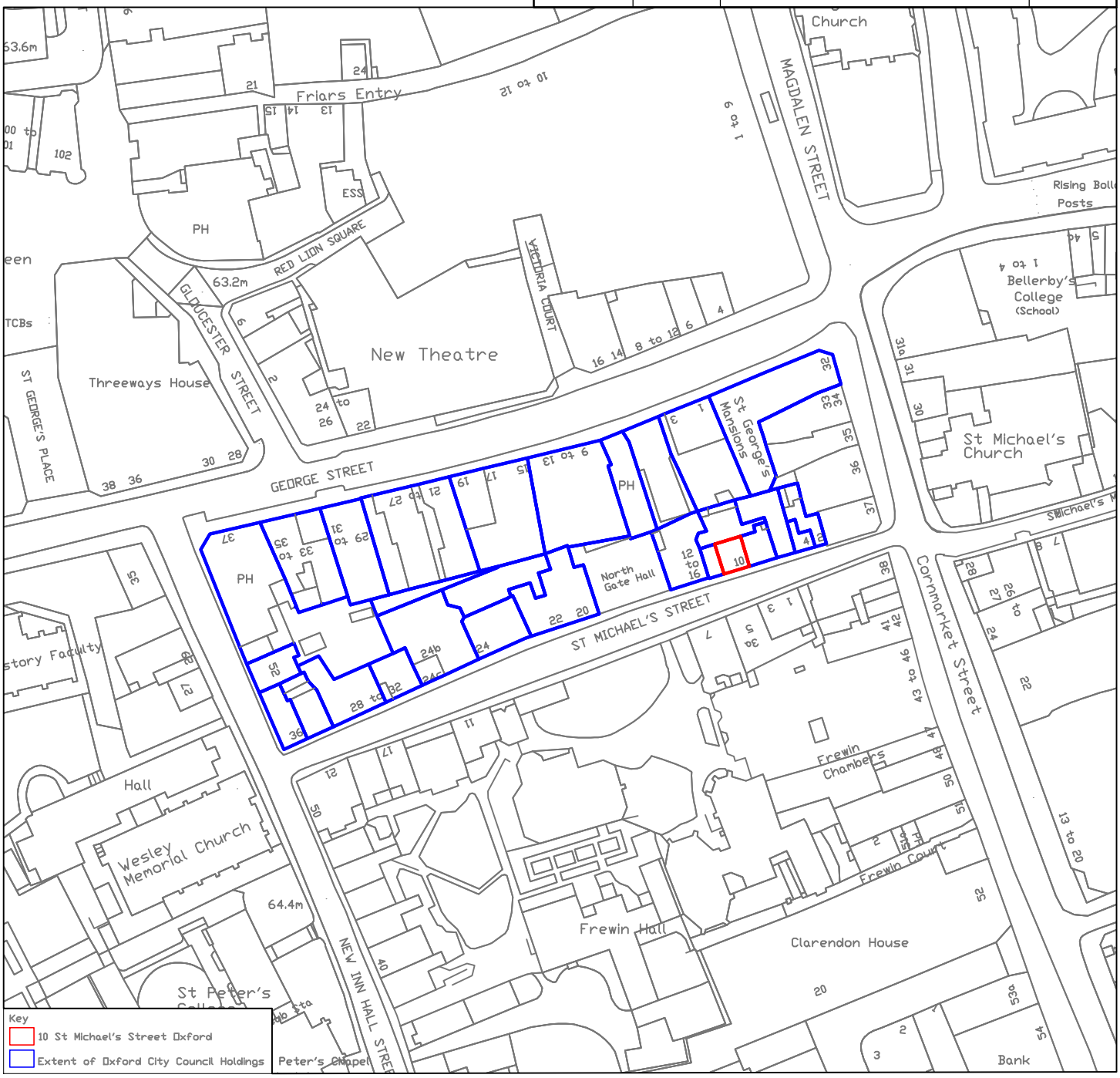

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Oxford City Council
Housing & Property Services
Building Design & Construction
St Aldate's Chambers
St Aldate's
OXFORD
OX1 1DS

Tel. 01865 249811
DDI. 01865 25****

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DRAWN BY	CHECKED BY	APPROVED BY
T.Evans	J.Axford	
DATE 16/04/2025	DATE 16/04/2025	
SCALE 1/1250 @ A4	STATUS Lease Plans	
DRAWING NUMBER/ SHEET NUMBER **BDC5010/SMS10/01**	REVISION -	

PROJECT TITLE
10 St Michael's Street, Oxford OX1 2DU

DRAWING TITLE
Plan 1

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Risk Register

9,10, 16a & 16b Ship St and 10 St Michaels Street, Oxford

As at: April 2025

									Gross		Current			Target							
Ref	Title	Risk Description	Opp / Threat	Cause	Consequence	Risk Treatment	Date Raised	Owner	P	I	P	I	Score	P	I	Comments	Control / Mitigation Description	Date Due	Action Status	% Progress	Action Owner
R1	Purchaser Interest	Purchaser pulls out of transaction	Threat	Lack of funding, change of strategy	Failure to dispose of asset impacting receipt to the Council	Accept	16/04/25	Bill Wilberforce	2	3	2	3	6	2	2	This is an unbudgeted capital receipt so no worse than current position, although strategy would need to be reviewed	Progress expediently to reduce the risk	01/07/25	In Progress	50%	BW
R2	Renegotiation of terms	Purchaser tries to chip price	Threat	Purchaser strategy	Reduction in capital receipt/net saving or no disposal at all	Accept	16/04/25	Bill Wilberforce	2	2	2	2	4	2	2	A chipped price would result in lower capital receipt with lower savings. No capital receipt is currently budgeted for these properties.	Progress expediently to reduce the risk. Regular communication with purchasers agent	01/07/25	In Progress	50%	BW
R3	Legal Delays	Delay to completion of legal agreements	Threat	Delays in agreeing and completion of legal documents	Risk of circumstances changing and delay of savings	Accept	16/04/25	Bill Wilberforce	2	3	2	3	6	2	2	Legals commenced, external solicitors appointed	External legal dealing to be in regular contact with purchasers solicitor and update OCC regularly	01/07/25	In Progress	30%	BW

THE RISK REGISTER IS FORMATTED AS A TABLE. PRESS TAB ON THE LAST TABLE CELL TO INSERT A NEW ROW.

Risk Identification

Risks should be identified that may affect the Council's ability to achieve its business objectives, execute its strategies successfully or limit its ability to exploit opportunities.

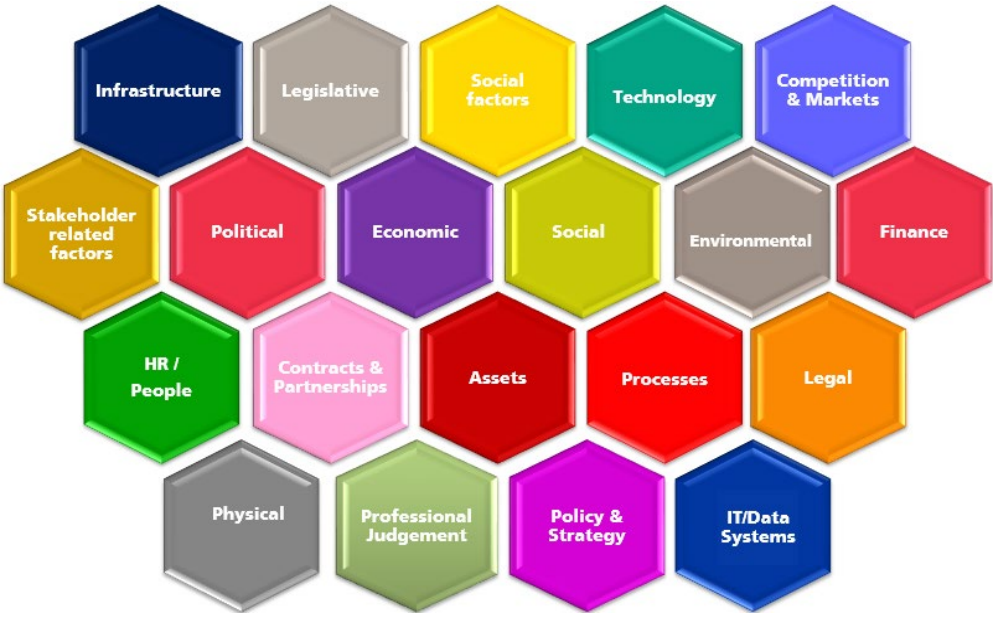
Risks can be identified through a number of methods, including:
• A 'brainstorming' session or workshop with the whole management team and relevant stakeholders
• Interviews or questionnaires with key stakeholders
• Meetings with smaller groups of people

There are a wide range of methods available that can be used to identify and understand risks. The method that you select will depend upon the type of risk(s) that you are dealing with but typically a management team workshop is the method most commonly used.

Additionally, existing sources of information could help inform this stage. Some examples are listed below:
• Service / corporate plans, strategies and objectives
• Existing risk registers
• Risks or issues raised by internal audit or other scrutiny body
• Risks identified through budget setting processes
• Health & safety risk assessments
• Business continuity risk assessments
• Partnership, programme or project documentation (e.g. business case or project risk register)
• Experience of those participating in the risk identification process

It is the responsibility of those identifying risks to decide which sources of information they should consult. This may be one or more of the sources listed above or it could be something else you think is appropriate.

As well as direct risks to the achievement of our objectives it is important to think broadly about uncertainties that may have an impact on the organisation. The diagram shown below illustrates a variety of different risk themes, expanding on PESTLE prompts, which the organisation could face. Think also in terms of these themes when identifying risks.



Once identified, the risks need to be described in sufficient detail and recorded in a consistent format to support effective decision making on the way that the risk is managed. It is crucial for risks to be defined properly at this stage. Failure to do so can result in confusion about the exact nature of the risk, ineffective risk controls being implemented, or the risk analysis being over or underestimated.

The description of the risk should include the following elements:
• Risk Title – a short and concise header for the risk
• Description – expanding on the risk title outlining the situation or event that exposes us to a risk.
• Risk Cause – also known as the trigger event. Situations or factors which result in the risk becoming a reality.
• Risk Effect – the likely consequences if the risk materialises (The negative impact - consider worst likely scenario)

When describing a risk try not to describe the impact of the risk as the risk itself or define risks with statements which are the converse of objectives. Focus upon the uncertain event that would result in those impacts.

Types of Risk to consider	
Strategic / Commercial	
1	Under performance to specification
2	Management will under perform against expectations
3	Collapse of contractors
4	Insolvency of promoter
5	Failure of suppliers to meet contractual commitments (quality, cost, time)
6	Insufficient capital
7	Market fluctuations
8	Trade/Banking crises
9	Fraud/theft
10	Partnership failing to deliver desired outcomes
11	Situation is not insurable (cost of insurance outweighs the benefit)
Economic / Financial / Market	
1	Exchange rate fluctuation
2	Interest rate instability
3	Inflation
4	Shortage of working capital
5	Failure to meet projected revenue targets
6	Market developments will adversely affect plans
Legal and Regulatory	
1	New or changed legislation may invalidate assumptions upon which the activity is based
2	Failure to obtain appropriate approval e.g. planning consent
3	Unforseen inclusion of contingent liabilities
4	Loss of intellectual property rights
5	Failure to achieve satisfactory contractual arrangements
6	Unexpected regulatory controls or licencing requirements
7	Changes in tax or tariff structure
Organisational / Management / Human factors	
1	Management incompetence
2	Inadequate corporate policies
3	Inadequate adoption of management practices
4	Poor leadership
5	Key personnel have inadequate authority to fulfil their roles
6	Poor staff selection procedures
7	Lack of clarity over roles and responsibilities
8	Vested interests creating conflict and compromising overall aims
9	Individual or group interests given unwarrented priority
10	Personality clashes
11	Indecision or inappropriate decision making
12	Lack of operational support
13	Inadequate or inaccurate information
14	Health and Safety constraints
Political	
1	Change of government policy
2	Change of government
3	War and disorder
4	Adverse public opinion/media intervention
Environmental	
1	Natural disasters
2	Storms, flooding, tempests
3	Pollution incidents

4	Transport problems (including aircraft/vehicle collisions)
Technical / Operational / Infrastructure	
1	Inadequate design
2	Professional negligence
3	Human error/incompetence
4	Infrastructure failure
5	Operation lifetime lower than expected
6	Increased dismantling/decommisioning costs
7	Safety being compromised
8	Performance failure
9	Residual maintenance problems
10	Scope creep
11	Unclear expectations
12	Breaches in security/information security
13	Lack or inadequacy of business continuity

Risk Evaluation and Prioritisation

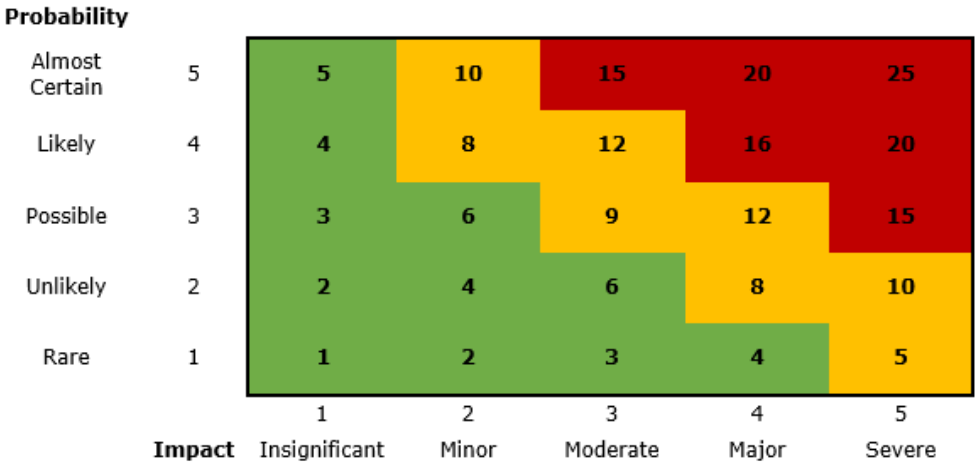
Once risks have been identified the risk matrix is the main tool for prioritising risks so we can establish which risks are most significant and therefore are in need of greater attention and resources. It also allows us to compare different types of risk with each other across the council.

Each risk should be analysed using a five by five matrix for (1) the likelihood it will happen and (2) the impact if it did occur. This assessment should be made on three different basis:
- Gross risk – risk level if existing key controls and mitigations were not in place or not effective.
- Current risk – risk level after existing controls and mitigations are taken into consideration.
- Target risk – anticipated risk level following the introduction of planned controls and mitigations.

Assessing the gross risk allows consideration of the dependency the organisation has upon the existing key controls and informs decisions around risk treatment, and selection of an appropriate target risk level, considered in the next section of this toolkit. It is often helpful to consider the Current Risk first, and then ask yourself what the impact and likelihood of the risk might be if the key controls were not in place.

It is the risk owner's responsibility to ensure the controls they believe are reducing the risk are effective and are working in practice. Controls that are not yet in place should not be considered within the current risk.

Each identified risk should then be plotted onto the risk matrix.



When considering the likelihood of a risk happening you should select the number from 1 to 5 from the risk matrix that you think it will be over the next 12 months (it can be longer or shorter; some risks in the Strategic Risk Register are better considered over 3 to 5 years, some operational risks will be considered over 3 to 6 months). This score will require an element of judgement when considering how likely an event is to occur and you should consider the following:
- Has this event happened before in the Council? (How frequently?) Has this event happened elsewhere? (How frequently?)
- How likely is it that one or more of the causes/ triggers of the event will occur?
- Has anything happened recently that makes the event more or less likely to occur?

The following tables provide some support in quantifying the risk in terms of likelihood and impact.

Risk Probability Assessment Criteria

Scale	Description	Likelihood of Occurrence	Probability of Occurrence
1	Rare	1 in 10 years	The event may occur in certain circumstances
2	Unlikely	1 in 3 years	The event could occur
3	Possible	1 in 2 years	The event should occur
4	Likely	Annually	The event will probably occur
5	Almost certain	Monthly	The event is expected to occur or occurs regularly

When you select the impact you should give consideration to the factors outlined in the risk matrix. For example, if the risk you are scoring has a low financial impact but a high impact on our reputation then you would select the most appropriate number between 1 and 5 that relates to the level of reputational impact. Once again, this score will have an element of judgement.

Risk Impact Assessment Criteria

	Insignificant	Minor	Moderate	Major	Severe
Financial	<£50k per annum	£50k - £250k per annum	£250k - £500k per annum	£500k - £750k per annum	>£750K per annum
Service Delivery	No impact to service quality, limited disruption to operations	Minor impact to service quality, minor service standards are not met, short term disruption to operations, minor impact on a partnerships	Significant fall in service quality, major partnership relationships strained, serious disruption in service standards	Major impact to service quality, multiple service standards are not met, long term disruption to operations, multiple partnerships affected	Catastrophic fall in service quality and key service standards are not met, long term catastrophic interruption to operations, several major partnerships are affected
Reputation	Public concern restricted to local complaints which do not attract local media attention.	Minor adverse local / public / media attention and complaints	Adverse national media public attention	Serious negative national or regional criticism	Prolonged, regional & national condemnation
Compliance & Regulation	Minor breach of internal regulations, not reportable	Minor breach of external regulations, not reportable	Breach of internal regulations leading to disciplinary action Breach of external regulations, reportable	Significant breach of external regulations leading to intervention or sanctions	Major breach leading to suspension or discontinuation of business and services
Strategic	Little impact on the organisational strategy	May have an impact on achieving organisational strategy	Would impact on the organisational objectives	Would require a significant shift from current strategy and objectives	Would require a fundamental change in strategy and objectives

Risk Treatment

Once risks have been identified and scored based on current controls the next step is to decide what action needs to be taken to manage them. Generally speaking, there are four approaches to treating risk: Treat, Tolerate, Terminate or Transfer:

Action	Description	Options
Treat / Reduce	Controlling the likelihood of the risk occurring, or controlling the impact of the consequences if the risk does occur	Reducing the likelihood of the risk occurring AND / OR Mitigating the impact if the risk does occur
Tolerate / Accept	Acknowledging that the ability to take effective action against some risks may be limited or that the cost of taking action may be disproportionate to the potential benefits gained.	The ability to take effective action against some risks may be limited or the cost of taking action may be disproportionate to the potential benefits gained in which case the risk is accepted on an "informed" basis.
Terminate / Avoid	Not undertaking the activity that is likely to trigger the risk	Changing the direction or strategy and revisiting objectives or improving channels of communication Obtaining further information from external sources or acquiring expertise Reducing the scope of the activity or adopting a familiar, proven approach Deciding not to undertake the activity likely to trigger the risk
Transfer	Handing the risk on elsewhere, either totally or in part – e.g. through insurance.	Financial instruments such as insurance, performance bonds, warranties or guarantee. Renegotiation of contract conditions for the risk to be retained by the other party. Seeking agreement on sharing the risk with the other party. Sub-contracting risk to a consultant or external suppliers. NB. It may not be possible to transfer all aspects of a risk. For example, where there is or reputational damage to the organisation.

When considering further action required to manage the risk, and indeed the appropriateness of existing controls, an assessment of treatment options should be made alongside a consideration of the Council's risk appetite and tolerance for the current level of risk.

A further consideration is the efficiency of risk treatment in relation to the cost effectiveness of the proposed actions to be taken. Firstly the cost of implementation has to be considered (time, manpower, budget, etc.). The impact expected if no action is taken, should be weighed against the cost of action and the reduction of the impact. There should be a direct benefit from the cost implementation in terms of the reduction of the level of the risk.

Plans should then be put into place to manage the risk with key milestones identified and clear owners – ensuring that they are 'SMART' – Specific, measurable, achievable, realistic, time bound.

Oxford City Council has focused on the Red, Amber, Green status of risks in determining the risk appetite of the organization. Red risks are considered unacceptable and every effort must be made to reduce the risk to the organization.

The risk appetite is reviewed periodically or when there are significant changes to the organisation. Changes to the risk appetite level would require a change to strategy and would therefore require approval of the Cabinet.

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OXFORD CITY COUNCIL

To:	**Cabinet**
Date:	18 June 2025
Report of:	Director of Planning and Regulation
Title of Report:	Community Infrastructure Levy – to recommend to Council the approval of amended Charging Schedule

	Summary and recommendations
Decision being taken:	To recommend to Council the approval of the Partial Review of the Community Infrastructure Levy Charging Schedule
Key decision:	Yes. Forward plan available on 1st May when I'll add the required link
Cabinet Member:	Councillor Alex Hollingsworth Cabinet Member for Planning
Corporate Priority:	Enable an Inclusive Economy Deliver More Affordable Housing Support Thriving Communities Pursue a Zero Carbon Oxford
Policy Framework:	The Community Infrastructure Levy (CIL) is a charge on new developments which helps to fund infrastructure, as is set out in CIL Regulations 2010 (as amended).[1] The CIL Charging Schedule sets out a standard tariff on development in Oxford City.

Recommendation(s): That Cabinet resolves to **recommend to Council that they**:

1. **Adopt the CIL Charging Schedule in line with the recommendation of the independent examiner as set out in Appendix 1**; and
2. **Approve the date on which the amended tariffs will come into effect.**
3. **Delegate authority to the Director of Planning and Regulatory to make any necessary further minor changes to the documents or any minor change to the implementation date for the new CIL rates.**

Appendix No.	Appendix Title	Exempt from Publication

Appendix 1	The CIL Charging Schedule as amended	No
Appendix 2	Inspectors Report	No

Introduction and background

1. The CIL Charging Schedule sets out a tariff in the form of a standard charge on new development to help the funding of infrastructure in Oxford. The City Council has been charging CIL on qualifying developments since 2013. The rates charged have risen with inflation but not been reviewed since the first Charging Schedule was published.
2. A Partial Review of the CIL Charging Schedule has been underway since 2023 and involved public consultation and an examination by an independent examiner. In the Charging Schedule submitted for examination, the City Council proposed amending the rate chargeable on Office and Research and Development uses from £33.74/m2 to £168.74/m2 (£172.28 m2 under current indexation). All other rates for all other uses would be unaffected by the review.
3. The Examiners' Report was received on 30th April 2025. The report found that the proposed rate would not threaten delivery of Office and Research & Development business in Oxford and concludes that the draft Oxford City Council Community Infrastructure Levy Charging Schedule provides an appropriate basis for the collection of the levy in the area. The purpose of this report therefore is to request that Cabinet recommend to Full Council that they approve the amended CIL Charging Schedule for use in calculating the planning charge on new development to help the funding of infrastructure.

Findings of the independent examiner

4. The City Council asked Intelligent Plans and Examinations (IPE) to examine the Partial Review of the Charging Schedule who appointed Mr Keith Holland BA (Hons) DipTP MRTPI ARCIS to the examination. The examination hearing was held on the 31st March 2025. Those who had responded to the consultation had the opportunity to appear at the examination in person or to rely on their written representations. Seven parties requested to be heard in person and the examination was concluded in one session.

5. The Council received the Examiner's final report on 30th April 2025. In his conclusions the Examiner states: *"I consider the viability assessment to be robust and conclude that the rate proposed would not threaten delivery of office/R&D development in Oxford. The proposed rates are justified, therefore. I conclude that the partial review of the draft Oxford City Community Infrastructure Levy Charging Schedule, satisfies the drafting requirements and I therefore recommend that the draft Charging Schedule be approved."*

6. This positive report means that the Council can now move to approving the Charging Schedule and start collecting CIL monies at the amended rates. Table 1

below sets out the CIL rates as amended, and (for comparison purposes) as existing. The highlighted row is the only change.

Table 1: CIL rates: existing and as amended

Development Type*	Jan 2024 rates per m^2	Amended rates per m^2 following review
E Shops	£168.74	£168.74
E Financial and professional services	£168.74	£168.74
E Restaurants and cafés	£168.74	£168.74
Sui Generis Drinking establishments	£168.74	£168.74
Sui Generis Hot food takeaways	£168.74	£168.74
E Office and Research & Development Business	£33.74	£168.74
B2 General industrial	£33.74	£33.74
B8 Storage or distribution	£33.74	£33.74
C1 Hotels	£33.74	£33.74
C2 and C2A Residential institutions and secure residential institutions	£33.74	£33.74
C3 Dwelling houses**	£168.74	£168.74
C4 Houses in multiple occupation (HMO)	£168.74	£168.74
Student accommodation	£168.74	£168.74
F1 Non-residential institutions	£33.74	£33.74
Sui Generis Assembly and leisure	£33.74	£33.74
All development types unless stated otherwise in this table	£33.74	£33.74

7. Following the receipt of the Examiner's report the Regulations require that the Charging Schedule be formally approved by a resolution of Full Council. This report seeks a Cabinet recommendation for that approval. The final Charging Schedule is attached at Appendix 1. The existing adopted Charging Schedule has been updated with the amended rate for Office and R&D uses. Factual updates to reflect the adoption of the document are shown as tracked changes. A clean version with the amendments accepted will be published as the final document.

Bringing the new levy rates into effect

8. The Regulations require that a date be approved by Council for the bringing into effect of the amended levy. The date recommended to Council for bring the levy into effect is Friday 15th August 2025. To be clear, any planning approvals granted after this date (defined by the issuing of a decision notice) will be subject to the amended CIL charge, irrespective of when that application was submitted.

Alternative Options Considered

9. The only alternatives to the recommendations outlined above are:

    a. To decide not to bring the amended rates into force and retain the existing rates – this would result in a significant overall reduction in the potential CIL receipts and the consequential loss of funding options for infrastructure projects within Oxford. Office and R&D development would continue to pay a much lower rate than other development types.

    b. To delay bringing the new levy rates into force – this would have similar but time limited impacts as point a above. There has already been a significant period of time for potential developers to anticipate this change. The proposed new rates were first published for consultation in November 2023 and again, for the statement of modifications in Feb/March 2025. The examiner's also states: "The Charging Schedule complies with the Act and the Regulations, including in respect of the statutory processes and public consultation".

    However, based on the Examiner's report, *"the evidence which has been used to inform the Charging Schedule is robust, proportionate and appropriate"* and "adoption of the rates are justified". We therefore recommend proceeding with his recommendation to adopt the new rates.

Financial implications

10. The rates at which the CIL tariff is set will determine the amount of income received by the Council from new development to be spent on infrastructure, which includes expenditure on the Council's Capital Programme. The evidence base for the Charging Schedule demonstrated that there is likely to be a continued supply of prime E(g) Office and Laboratory floorspace within the Local Plan period, increasing rates where this is viable will help fund the required infrastructure needs associated with development. Based on evidence submitted to the CIL examination library on the Infrastructure Funding Gap, this rate could result in income of >£30m for infrastructure in the city.

11. A discretionary relief policy for CIL remains in place for cases where developers can demonstrate that their proposed development is unviable to the Council

Legal issues

12. The Independent Examiner has found that the City Council has complied with the statutory requirements of the Act and CIL Regulations (as amended). There are no other legal issues arising from this report.

Level of risk

Risks around the potential impact of the new rates have been considered by the Independent Examiner who found the raise in the charge for R&D would not threaten the delivery of this type of development in Oxford. The receipt of the Examiner's Report has also dealt with any procedural risk around the process of drafting of the Charging Schedule.

Equalities impact

13. There are no equalities impacts arising from this report.

Carbon and Environmental Considerations

There are no direct carbon or environmental considerations arising from this report.

Report author	Lorraine Freemen
Job title	CIL, Data Analysis and Reporting Team Leader
Service area or department	Planning Policy
Telephone	01865 252178
e-mail	Lfreeman@oxford.gov.uk

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Planning Policy

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OXFORD CITY COUNCIL

Community Infrastructure Levy Charging Schedule

August 2025

Providing a world-class city for everyone

Introduction

1 In 2010, the Government introduced the Community Infrastructure Levy (CIL) as the preferred mechanism for securing developer contributions towards infrastructure to support growth in an area.

2 The City Council was a front-runner in adopting its current CIL Charging Schedule in October 2013, but it is important that the CIL charges are reviewed to ensure that the Council is maximising funding towards infrastructure.

3 The City Council is also in the process of producing the Local Plan 2040. It is therefore prudent to review the Charging Schedule at the current time so that it can be demonstrated how the Charging Schedule will support delivery of the Local Plan 2040.

4 New viability evidence has been produced to support a review of the Charging Schedule and provide evidence for the Local Plan 2040 to support the proposed rates following the CIL consultation.

5 The City Council is a charging authority under CIL legislation and went out to consultation on this Draft Charging Schedule with a view to adopting the new schedule in 2024/5. The consultation took place from **Friday 10th November 2023 to Friday 5th January 2024 and again, for the statement of modifications in Feb/March 2025.**

6 In line with the updated evidence and having taken into consideration the content of the representations raised at consultation, partial amendments to the existing CIL Charging Schedule are published for examination.

7 The Draft Charging Schedule is supported by the following evidence documents, which can be found on the Council's website:

- *The Infrastructure Delivery Plan (IDP)* which sets out infrastructure requirements to support the delivery of the Local Plan 2040.
- *An Infrastructure Funding Gap Statement* – demonstrating that a considerable infrastructure gap remains, and CIL funding is still highly desirable for Oxford in addition to other funding sources.
- *The Infrastructure Funding Statement 2021/2022*, which includes the list of Infrastructure Projects which CIL is intended to fund partly or in full.
- *The Oxford City Council: Local Plan Viability Assessment* has been undertaken by consultants (BNP Paribas) and is a critical piece of evidence to assist in determining the most appropriate level for the CIL tariff. It considers the viability of development against the costs placed upon new development through the Local Plan 2040's policies and the application of CIL.
- *The Oxford CIL Offices and R&D Viability Addendum note* was produced following consultation to consider additional site-specific testing of the R&D and Offices rates.

The Community Infrastructure Levy

8 Oxford City Council is the charging authority for the purpose of Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

9 The Community Infrastructure Levy is a tariff in the form of a standard charge on new development, which in Oxford is set by the City Council to help the funding of infrastructure. It is intended to supplement, or top up, other sources of funding to widen infrastructure delivery.

10 Most development has some impact on infrastructure and should contribute to the cost of providing or improving infrastructure. The principle behind CIL is for those who benefit financially from a planning permission to pay towards the cost of funding the infrastructure needed to support development.

11 CIL will improve Oxford City Council's ability to mitigate the cumulative impacts on infrastructure from most developments as it is charged on a per square metre basis and is proportional to the scale of the development.

12 In investing in the infrastructure of the area, CIL is expected to have a positive economic effect on development in the medium to long term.

13 The City Council must set CIL rates in a Charging Schedule and can implement these, after taking a consultation and an Examination in Public followed by adoption. Following the 2019 amendments to the CIL regulations, the requirement for a preliminary draft charging schedule and consultation has been removed.

14 Regulation 14 of the CIL regulations (as amended) state that when setting CIL rates, the Council must strike an appropriate balance between the desirability to fund infrastructure through CIL and the potential effect (taken as a whole) of the levy on the economic viability of development in the area where CIL charges apply. When considering infrastructure costs, the Council needs to estimate the cost of infrastructure to support development and take into account other sources of funding.

> **CIL Regulations 2010 (as amended), Part 3, Regulation 14:**
> *'14.—(1) In setting rates (including differential rates) in a charging schedule, a charging authority must strike an appropriate balance between—*
> *(a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and*
> *(b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.*
> *(2) In setting rates in a charging schedule, a charging authority may also have regard to actual and expected administrative expenses in connection with CIL to the extent that those expenses can be funded from CIL in accordance with regulation 61…'*

15 Regulation 13 of the CIL Regulations 2010 (as amended) makes provision for the setting of differential rates for different geographical areas, different development types/uses,

and development size or a combination of them. Any differential rate should be justified by economic viability evidence.

16 The term 'taken as a whole' indicates that economic viability evidence is used to show that CIL rates can be borne by most development across Oxford. It does not mean that CIL rates can be borne by each and every development. The City Council has used evidence in the Oxford City Council: Local Plan Viability Assessment to inform appropriate CIL rates.

17 Infrastructure and economic viability evidence supporting the Draft Charging Schedule illustrates that an appropriate balance between funding infrastructure and economic viability has been sought.

Viability Evidence and Proposed CIL Charges

18 The Oxford City Council: Local Plan Viability Assessment assesses the economic viability of development in Oxford. To consider setting CIL rates for different types of development, the Study considers the cumulative application of policies in the Local Plan 2040 on different development typologies and then considers the ability of each development type to support additional CIL rates.

19 Following consultation, an additional addendum note was produced to consider comments made at consultation of the partial review of the charging schedule.

20 The evidence gathered in the original and supplementary viability work supports an increase in Class E – Office and R&D rates, demonstrating from site-specific testing that surpluses from key employment sites can accommodate an increase in this rate.

21 Although original viability testing showed that Class B developments can accommodate an increased CIL rate, following the approval of a recent major industrial development, there is currently no known Class B floorspace anticipated to come forth, meaning that additional site-specific testing could not be carried out.

22 The proposed changes to the adopted charging schedule are thus to increase E – Office and R&D rates, and to maintain B2/B8 industrial rates at their current rate.

23 As these are the only changes being proposed, the Council intends for the rest of the charging schedule to remain as it is and for this review to be considered a partial review.

24 If and where issues of viability or economic impact may arise, the exceptional circumstances relief policy introduced in 2019 can be considered to mitigate risk of delivery of sites on a case-by-case basis (Annex 5).

25 The proposed CIL rates in pounds sterling per square metre according to the type of development are shown in Table 1 below:

Table 1 - CIL Charging Schedule for Oxford City Council (Changes from original 2013 schedule highlighted in green)

Development Type*	Jan 2023 Rates per m^2	Jan 2024 Rates per m^2	Proposed rates per m^2 following Partial Review Consultation	Jan 2025 Rates per m^2
E Shops	£158.00	£168.74	£168.74	£172.28
E Financial and professional services	£158.00	£168.74	£168.74	£172.28
E Restaurants and cafés	£158.00	£168.74	£168.74	£172.28
Sui Generis Drinking establishments	£158.00	£168.74	£168.74	£172.28
Sui Generis Hot food takeaways	£158.00	£168.74	£168.74	£172.28
E Offices and R&D	**£31.59**	**£33.74**	**£168.74**	£172.28***
B2 General industrial	£31.59	£33.74	£33.74	£34.45
B8 Storage or distribution	£31.59	£33.74	£33.74	£34.45
C1 Hotels	£31.59	£33.74	£33.74	£34.45
C2 and C2A Residential institutions and secure residential institutions	£31.59	£33.74	£33.74	£34.45
C3 Dwelling houses**	£158.00	£168.74	£168.74	£172.28
C4 Houses in multiple occupation (HMO)	£158.00	£168.74	£168.74	£172.28
Student accommodation	£158.00	£168.74	£168.74	£172.28
F1 Non-residential institutions	£31.59	£33.74	£33.74	£34.45
Sui Generis Assembly and leisure	£31.59	£33.74	£33.74	£34.45
All development types unless stated otherwise in this table	£31.59	£33.74	£33.74	£34.45

*Changes to the Use Class Order came into effect 1 September 2020
**C3 includes self-contained sheltered accommodation and self-contained graduate accommodation
*** New rate from August 2025

CIL liability

26 Development liable for CIL payment comprises:

- Development that creates 100m^2 or more of new build floor space measured as Gross Internal Floor Area (GIA).
- Development of less than 100m^2 new build GIA that results in the creation of one or more dwellings.
- The conversion of a building that is no longer in lawful use.

27 Liability to pay CIL on qualifying developments applies whether development requires planning permission or is enabled through permitted development orders (General Permitted Development Order, Local Development Orders, Neighbourhood Development Orders, Enterprise Zones)[1]

CIL exemptions

28 CIL charges will not be levied on:

- Development that creates less than 100m^2 of new build floor space measured as GIA and does not result in the creation of one or more dwellings;
- Buildings into which people do not normally go, or a building into which people go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery;[2]
- Buildings for which planning permission was granted for a limited period.
- Affordable housing, subject to an application by a landowner for CIL relief (CIL regulation 49);
- Development by charities for charitable purposes subject to an application by a charity landowner for CIL relief (CIL regulation 43) (mandatory charitable relief);
- Self-build (CIL regulation 42A and 54A).[3]

29 A charging authority can choose to offer discretionary relief to a charity landowner where the greater part of the chargeable development will be held as an investment, from which the profits are applied for charitable purposes (CIL regulation 44).

30 It can also choose to offer exceptional circumstances relief (CIL regulation 55) on the basis of an unacceptable impact on the economic viability of a development, and where the exemption of a charitable institution from liability to pay CIL would constitute State aid (CIL regulation 45) and would otherwise be exempt from liability under regulation 43.

31 In Oxford City discretionary charity relief is not available (CIL regulation 44). However, a Discretionary Exceptional Circumstances Relief Policy (CIL regulation 55) is available. (Annex 5)

[1] Regulations 5 and 9 of the Community Infrastructure Levy Regulations 2010 as amended
[2] Regulation 6 (2) of the Community Infrastructure Levy Regulations 2010 as amended

Calculating the chargeable amount

32 The City Council will calculate the amount of CIL chargeable in accordance with regulation 40 of the Community Infrastructure Levy (as amended) Refer to Annex 2 for an extract of this regulation.

33 The relevant rate (R) for each development type is shown in the Charging Schedule above and the Gross Internal Area (GIA) is measured and calculated in accordance with the Royal Institute of Chartered Surveyors (RICS) Code of Measuring Practice. Annex 3 sets out an extract of RICS code.

34 The chargeable amount will reflect inflation by being index linked to RICS' Building Cost Information Service 'CIL Index'.

35 Amended CIL Regulations mean that for Section 73 applications to vary an existing planning condition, CIL will only be payable upon any increase in chargeable floorspace from the section 73 application/permission[3].

Netting off existing floor space

36 In certain circumstances, where a development includes the demolition of an existing building, the existing Gross Internal Area (GIA) can be deducted from the proposed floorspace. These deductions in respect of demolition or change of use will only apply where the existing building has been in continuous lawful use[4] for at least six months in the 3 years prior to the development being permitted and is still in situ on the day planning permission is granted.

37 Oxford City Council may deem the Gross Internal Area (GIA) of a building to be zero where there is not sufficient information, or no information of sufficient quality, regarding the GIA of an existing building or whether it is in lawful use.

Liability for CIL

38 Once planning permission is granted, CIL regulations encourage any party, (such as a developer submitting a planning application, or a landowner), to take liability to pay the CIL charge. CIL liability runs with the land. If no party assumes liability to pay before development commences, land-owners will be liable to pay the levy.

Payment of CIL

39 The default position is that CIL payment is due within 60 days of the commencement of development; however in some cases CIL is due immediately.[5] For some developments,

[3] Regulation 42A and 54A of the Community Infrastructure Levy (As amended)

[4] *'in-use building' means a building which (i) is a relevant building and (ii) contains a part that has been in use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development'* (Regulation 40(11) of the Community Infrastructure Levy Regulations 2010 (as amended)

[5] Payments are due immediately where no party assumes liability and/or no commencement notice is submitted before commencement. Where this occurs the developer does not get the benefit of payment by instalments.

instalments may be permitted in accordance with the City Council's Instalments policy. Annex 4 of this document sets out an Instalments Policy.

Payments in kind

40 In circumstances where the liable party and Oxford City Council agree, payment of the levy may be made by transferring land. The agreement cannot form part of a planning obligation, must be entered into before the chargeable development is commenced[6] and is subject to fulfilling the following:

- the acquired land is used to provide or facilitate the provision of infrastructure within Oxford;
- the land is acquired by Oxford City Council or a person nominated by Oxford City Council;
- the transfer of the land must be from a person who has assumed liability to pay CIL;
- the land has to be valued by an independent person agreed by Oxford City Council and the person liable to pay CIL;
- 'Land' includes existing buildings and other structures, land covered with water, and any estate, interest, easement, servitude or right in or over the land.

Collection of CIL

41 Oxford City Council is the collecting authority for the purpose of Part 11 of the Planning Act 2008 and CIL Regulations 2010 (as amended).

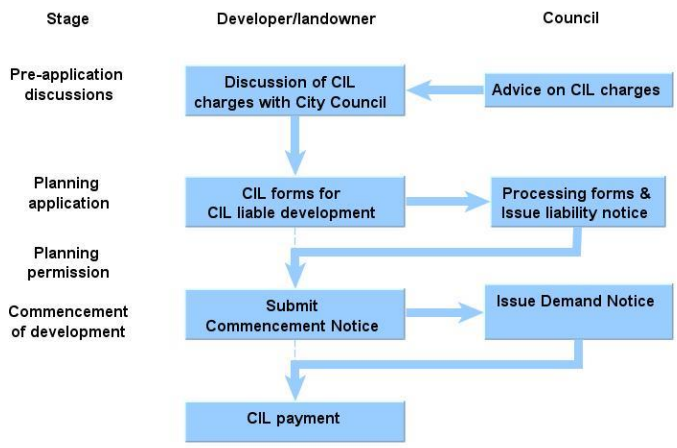
42 When planning permission is granted, Oxford City Council will issue a liability notice setting out the amount payable, and the payment procedure.

43 In the case of development enabled through permitted development orders, the person(s) liable to pay will need to consider whether their proposed development is chargeable, and to issue Oxford City Council a notice of chargeable development.

44 The diagram below illustrates a summarised version of the collection process:

CIL Collection Process

[6] Regulation 73 (6)(d) of the Community Infrastructure Levy Regulations 2010 as amended.



Appeals

45 A liable person can request a review of the chargeable amount by the charging authority within 28 days from the issue of the liability notice. CIL Regulations allow for appeals on:

- The calculation of the chargeable amount following a review of the calculation by the City Council.
- Disagreement with the City Council's apportioned liability to pay the charge.
- Any surcharges incurred on the basis that they were calculated incorrectly, or that a liability notice was not served or the breach did not occur.
- A deemed commencement date if considered that the date has been determined incorrectly.
- Against a stop notice if a warning notice was not issued or the development has not yet commenced.

46 A person aggrieved by the levy (or attempt to levy), a distress may appeal to the Magistrates Court (regulation 99).

Spending and reporting on CIL revenue

47 CIL revenue will be spent on the infrastructure needed to support development in Oxford. Oxford City Council will publish on its website a list of infrastructure projects or types of infrastructure that may be wholly or partly funded by the levy. This list for CIL expenditure is set out each year in the Council's Infrastructure Funding Statement, and the full infrastructure list for Oxford City is set out in the Infrastructure Delivery Plan.

48 Oxford City Council will publish an annual Infrastructure Funding Statement, for each financial year including:

- How much has been collected in CIL and S106 contributions;
- How much has been spent;
- The infrastructure on which it has been spent;
- Any amount used to repay borrowed money;
- Amount of CIL retained at the end of the reported year.

49 It is the Government's intention to allow for a proportion of CIL to be passed to Parish Councils and Neighbourhoods[7]. 15% of CIL receipts in parished areas are to be passed to the relevant Parish Council. In unparished areas, this 15% would be held by the City Council and spent in consultation with the community. The proportion would rise to 25% in areas with adopted Neighbourhood Plans.

Administration fee

50 Oxford City Council will use 5% of the CIL revenue to fund the administration costs of the Levy.

CIL and Section 106 agreements

51 Unlike Section 106 (S106), the levy is to provide infrastructure to support the development of an area, not to make individual planning applications acceptable in planning terms. It breaks the link between a specific development site and the provision of infrastructure and thus provides greater flexibility for delivery of infrastructure when and where it is needed.

52 Section 106 agreements and Section 278 Highways Agreements will continue to be used to secure site-specific mitigation and affordable housing. In some instances, S106 agreements may be used in strategic development sites needing the provision of their own specific infrastructure for which delivery may be more suitably dealt with through S106s.

53 Following removal of the regulation 123 list, the amended CIL regulations no longer contain a restriction on the pooling of funds from more than five S106 obligations to fund a single infrastructure project and both CIL and S106 funding can be secured towards the same piece of infrastructure.

[7] Set out in Regulation 59A of the Community Infrastructure Levy (As amended)

Annex 1 - Guide to Use class Order definitions

The following list is based on the Government's guide to Use Classes as shown in their planning and building regulations online resource 'The Planning Portal'. It is not a definitive source of legal information.

Class B

- B2 General industrial - Use for industrial process other than one falling within class E(g) (previously class B1) (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
- B8 Storage or distribution - This class includes open air storage.

Class C

- C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)
- C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres
- C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks
- C3 Dwellinghouses - This class is formed of three parts
- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child
- C3(b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger
- C4 Houses in multiple occupation - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

Class E – Commercial, Business and Service

- In 11 parts, Class E more broadly covers uses previously defined in the revoked Classes A1/2/3, B1, D1(a-b) and 'indoor sport' from D2(e):
- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(c) Provision of:
- E(c)(i) Financial services,
- E(c)(ii) Professional services (other than health or medical services), or

- E(c)(iii) Other appropriate services in a commercial, business or service locality
- E(d) Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
- E(g)(i) Offices to carry out any operational or administrative functions,
- E(g)(ii) Research and development of products or processes
- E(g)(iii) Industrial processes

Class F – Local Community and Learning

- In two main parts, Class F covers uses previously defined in the revoked classes D1, 'outdoor sport', 'swimming pools' and 'skating rinks' from D2(e), as well as newly defined local community uses.
- F1 Learning and non-residential institutions – Use (not including residential use) defined in 7 parts:
- F1(a) Provision of education
- F1(b) Display of works of art (otherwise than for sale or hire)
- F1(c) Museums
- F1(d) Public libraries or public reading rooms
- F1(e) Public halls or exhibition halls
- F1(f) Public worship or religious instruction (or in connection with such use)
- F1(g) Law courts
- F2 Local community – Use as defined in 4 parts:
- F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
- F2(b) Halls or meeting places for the principal use of the local community
- F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
- F2(d) Indoor or outdoor swimming pools or skating rinks

Sui Generis

- 'Sui generis' is a Latin term that, in this context, means 'in a class of its own'.
- Certain uses are specifically defined and excluded from classification by legislation, and therefore become 'sui generis'. These are:
- theatres
- amusement arcades/centres or funfairs
- launderettes
- fuel stations
- hiring, selling and/or displaying motor vehicles
- taxi businesses
- scrap yards, or a yard for the storage/distribution of minerals and/or the breaking of motor vehicles
- 'Alkali work' (any work registerable under the Alkali, etc. Works Regulation Act 1906

(as amended))

- hostels (providing no significant element of care)
- waste disposal installations for the incineration, chemical treatment or landfill of hazardous waste
- retail warehouse clubs
- nightclubs
- casinos
- betting offices/shops
- pay day loan shops
- public houses, wine bars, or drinking establishments – from 1 September 2020, previously Class A4
- drinking establishments with expanded food provision – from 1 September 2020, previously Class A4
- hot food takeaways (for the sale of hot food where consumption of that food is mostly undertaken off the premises) – from 1 September 2020, previously Class A5
- venues for live music performance – newly defined as 'Sui Generis' use from 1 September 2020
- cinemas – from 1 September 2020, previously Class D2(a)
- concert halls – from 1 September 2020, previously Class D2(b)
- bingo halls – from 1 September 2020, previously Class D2(c)
- dance halls – from 1 September 2020, previously Class D2(d)
- Other uses become 'sui generis' where they fall outside the defined limits of any other use class.
- For example, C4 (Houses in multiple occupation) is limited to houses with no more than six residents. Therefore, houses in multiple occupation with more than six residents become a 'sui generis' use.

Source: Planning Portal http://www.planningportal.gov.uk

Annex 2 – Schedule 1 of the Community Infrastructure Levy Regulations (As amended)

CHARGEABLE AMOUNT – Part 1 – Standard Cases

Calculation of chargeable amount

(1) The collecting authority must calculate the amount of CIL payable ("chargeable amount") in respect of a chargeable development in accordance with this regulation.
(2) The chargeable amount is an amount equal to the aggregate of the amounts of CIL chargeable at each of the relevant rates.
(3) But where that amount is less than £50 the chargeable amount is deemed to be zero.
(4) The relevant rates are the rates, taken from the relevant charging schedules, at which CIL is chargeable in respect of the chargeable development.
(5) The amount of CIL chargeable at a given relevant rate (R) must be calculated by applying the following formula—

$$\frac{R \times A \times I_P}{Ic}$$

where—
A = the deemed net area chargeable at rate R, calculated in accordance with paragraph (7);
I_P = the index figure for the year in which planning permission was granted; and
I_C = the index figure for the year in which the charging schedule containing rate R took effect.
(6) In this regulation the index figure for a given year is -
(a) the figure for 1st November for the preceding year in the RICS CIL Index published from time to time by the Building Cost Information Service of the Royal Institution of Chartered Surveyors (**1**); or
(b) if the RICS CIL Index ceases to be published, the figure for 1st November for the preceding year in the retail prices index.
(7) The value of A must be calculated by applying the following formula—

$$G_R - K_R - \left(\frac{G_R \times E}{G}\right)$$

where—
G = the gross internal area of the chargeable development;
G_R = the gross internal area of the part of the chargeable development chargeable at rate R;
K_R = the aggregate of the gross internal areas of the following—

(i) retained parts of in-use buildings, and
(ii) for other relevant buildings, retained parts where the intended use following completion of the chargeable development is a use that is able to be carried on lawfully and permanently without further planning permission in that part on the day before planning permission first permits the chargeable development;

E = the aggregate of the following—

(i) the gross internal areas of parts of in-use buildings that are to be demolished before completion of the chargeable development, and
(ii) for the second and subsequent phases of a phased planning permission, the value E_x (as determined under paragraph (8)), unless E_x is negative,

provided that no part of any building may be taken into account under both of paragraphs (i) and (ii) above.

(8) The value E_x must be calculated by applying the following formula—

$$E_P - (G_P - K_{PR})$$

where—

E_P = the value of E for the previously commenced phase of the planning permission;
G_P = the value of G for the previously commenced phase of the planning permission; and
K_{PR} = the total of the values of K_R for the previously commenced phase of the planning permission.
(9) Where a collecting authority does not have sufficient information, or information of sufficient quality, to enable it to establish that a relevant building is an in-use building, it may deem it not to be an in-use building.
(10) Where a collecting authority does not have sufficient information, or information of sufficient quality, to enable it to establish—
(a) whether part of a building falls within a description in the definitions of K_R and E in paragraph (7); or
(b) the gross internal area of any part of a building falling within such a description, it may deem the gross internal area of the part in question to be zero.
(11) In this regulation—
"building" does not include—
(i) a building into which people do not normally go,
(ii) a building into which people go only intermittently for the purpose of maintaining or inspecting machinery, or
(iii) a building for which planning permission was granted for a limited period;
"in-use building" means a building which—
(i) is a relevant building, and
(ii) contains a part that has been in lawful use for a continuous period of at least six months within the period of three years ending on the day planning permission first permits the chargeable development;
"new build" means that part of the chargeable development which will comprise new buildings and enlargements to existing buildings;
"relevant building" means a building which is situated on the relevant land on the day planning permission first permits the chargeable development;
"relevant charging schedules" means the charging schedules which are in effect—
(i) at the time planning permission first permits the chargeable development, and
(ii) in the area in which the chargeable development will be situated;
"retained part" means part of a building which will be—
(i) on the relevant land on completion of the chargeable development (excluding new build),
(ii) part of the chargeable development on completion, and
(iii) chargeable at rate R."

(1) Registered in England and Wales RC00487.

Annex 3 – How to measure Gross Internal Area

Oxford City Council will use the Royal Institution of Chartered Surveyors (RICS)'s Code of Measuring Practice to measure or check the Gross Internal Area (GIA) of a development and calculate or confirm its relevant CIL rate. The guide below is based on RICS' Code of Measuring Practice (6th edition, with amendments), the full Code of Measuring Practice is available in RICS website at http://www.rics.org

GIA is the area of a building measured to the internal face of the perimeter walls at each floor level.

Including:

- Areas occupied by internal walls and partitions
- Columns, piers, chimney breasts, stairwells, lift-wells, other internal projections, vertical ducts, and the like
- Atria and entrance halls, with clear height above, measured at base level only
- Internal open-sided balconies, walkways, and the like
- Structural, raked or stepped floors are property to be treated as a level floor measured horizontally
- Horizontal floors, with permanent access, below structural, raked or stepped floors
- Corridors of a permanent essential nature (e.g. fire corridors, smoke lobbies)
- Mezzanine floor areas with permanent access
- Lift rooms, plant rooms, fuel stores, tank rooms which are housed in a covered structure of a permanent nature, whether or not above the main roof level
- Service accommodation such as toilets, toilet lobbies, bathrooms, showers, changing rooms, cleaners' rooms, and the like
- Projection rooms
- Voids over stairwells and lift shafts on upper floors
- Loading bays
- Areas with a headroom of less than 1.5m*
- Pavement vaults
- Garages
- Conservatories

Excluding:

- Perimeter wall thicknesses and external projections
- External open-sided balconies, covered ways and fire escapes
- Canopies
- Voids over or under structural, raked or stepped floors
- Greenhouses, garden stores, fuel stores, and the like in residential

* GIA is the basis of measurement in England and Wales for the rating of industrial buildings, warehouses, retail warehouses, department stores, variety stores, food superstores and many specialist classes valued by reference to building cost (areas with a headroom of less than 1.5m being excluded except under stairs)

Annex 4 – Instalments policy

Community Infrastructure Levy Installments Policy

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a) This policy is made in line with regulation 69B of the Community Infrastructure Levy (As amended). Oxford City Council will allow the payment of CIL as outlined in points 1 and 2 below:
b) Where the chargeable amount is less than £200,000 the chargeable amount will be required within 60 days of commencement.
c) Where the chargeable amount is between £200,000 and £2 million, the chargeable amount will be required as per the following four instalments:

1st instalment	2nd instalment	3rd instalment	4th instalment
25% within 60 days	25% within 160 days	25% within 260 days	25% within 360 days

Where the chargeable amount is over £2 million, the chargeable amount will be required as per the following four instalments:

1st instalment	2nd instalment	3rd instalment	4th instalment
25% within 60 days	25% By end of year 1	25% By end of year 2	25% By end of year 3

d) Commencement will be taken to be the date advised by the developer in the commencement notice under CIL regulation 67.
e) Notes:
f) N1: When the City Council grants an outline planning permission which permits development to be implemented in phases, each phase of development is a separate chargeable development and the instalment policy will apply to each separate phase.
g) N2: This policy will not apply if:
a) A commencement notice is not submitted prior to commencement of the chargeable development
b) Nobody has assumed liability to pay CIL in respect of the chargeable development prior to the intended day of commencement
c) Failure to notify the City Council of a disqualifying event before the end of 14 days beginning with the day the disqualifying event occurs
d) An instalment payment has not been made in full after the end of the period of 30 days beginning with the day on which the instalment payment was due.

Annex 5 – Discretionary Exceptional Circumstances Relief Policy

Community Infrastructure Levy
Discretionary Exceptional Circumstances Relief Policy

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Oxford City Council has determined to make relief for exceptional circumstances available, in accordance with Regulations 55-57 of the Community Infrastructure Levy Regulations 2010 (as amended).

This Relief is discretionary and will be introduced from 1st June 2019 until further notice.

Oxford City Council will consider each application received individually and will at its own discretion decide whether to grant relief or not. Regulation 56 allows for the withdrawal of this relief at any time.

Discretionary relief for exceptional circumstances must be claimed for and approved prior to the commencement of the chargeable development. This note is not intended to be a definitive interpretation of the legislation or CIL Regulations and applicants are advised to seek professional advice as appropriate.

Process for exceptional circumstances relief

Exceptional circumstances relief can be applied for after planning permission has been granted but before development commences. Anyone wishing to claim exceptional circumstances relief must do so by following the procedures set out in Regulation 57 of the CIL Regulations 2010 (as amended)
https://www.legislation.gov.uk/ukdsi/2010/9780111492390/regulation/57

In order to qualify for the relief, the following criteria must apply:
• a planning obligation has been entered into in respect of the planning permission which permits the chargeable development; and Oxford City Council considers that:
• requiring payment of the Community Infrastructure Levy charged by the Council would have an unacceptable impact on the economic viability of the chargeable development

The application must be accompanied by:
• an assessment carried out by an independent person of the cost of complying with the planning obligation mentioned in Regulation 55(3)(b);
• an assessment carried out by an independent person of the economic viability of the chargeable development;
• an explanation of why in the opinion of the claimant, payment of the chargeable amount would have an unacceptable impact on the economic viability of that development;
• an apportionment assessment where there is more than material interest in the land; and
• a declaration that the claimant has complied with paragraph 6 of Regulation 57.

As set out in the regulations an independent person is a person who is appointed by the claimant with the agreement of the charging authority; and has appropriate qualifications and experience. Subject to the requirements of the Community Infrastructure Levy Regulations

2010 (as amended), Oxford City Council will decide the amount of any relief to be granted in individual cases. The development must also commence within 12 months of any relief being granted.

For further information about making a claim for discretionary relief for exceptional circumstances please see Regulations 55 and 57 of the Community Infrastructure Levy 2010 (as amended).

The onus is on the applicant to demonstrate they qualify for this relief and appropriate evidence must be submitted with any application. It should be noted that Oxford City Council has undertaken viability assessments on various types of development to verify the level at which the CIL charges have been set, therefore, any applications received under this regulation are expected to be genuinely exceptional.

Timescales

Decisions under this policy will be subject to a cabinet decision.

The Council will notify the applicant as soon a practicable after receiving the claim for relief in writing of its decision on the claim.

A claim for relief will lapse if the development commences prior to the Council notifying the applicant of its decision.

Disqualifying events

The Council must be notified in writing within 14 days of a disqualifying event and the full chargeable amount will become payable. Failure to do so will amount in a surcharge equal to 20% of the chargeable amount or £2,500, whichever is the lesser being applied to the payable amount.

Disqualifying events (within a 7-year period from commencement) include:

(a) Before the chargeable development is commenced—
(i) Charitable or social housing relief (or an exemption for self-build housing or residential annexes or extensions) is granted in respect of the chargeable development, or
(ii) An owner of a material interest in the relevant land makes a material disposal of that interest; or
(b) At the end of the period of 12 months beginning with the day on which the charging authority issues its decision on the claim, the chargeable development has not been commenced.

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AN EXAMINATION UNDER SECTION 212
OF THE PLANNING ACT 2008 (AS AMENDED)

REPORT ON THE DRAFT OXFORD CITY COUNCIL COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

Independent Examiner (appointed by the Council): Keith Holland BA (Hons) Dip TP MRTPI ARICS

Charging Schedule Submitted for Examination: 12 February 2025

Date of Report: 30 April 2025

Contents

Main Findings - Executive Summary 3
Introduction 3
Has the charging authority complied with the legislative requirements set out in the Act and the Regulations, including undertaking an appropriate level of consultation? 5
Is the draft charging schedule supported by background documents containing appropriate available evidence? 5
Infrastructure Planning Evidence 5
Economic Viability Evidence 5
Are the proposed rates informed by and consistent with the evidence on viability across the charging authority's area? 7
Commercial Rate 7
Has evidence been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see National Planning Policy Framework paragraph 34[1])?. 7
Overall Conclusion 10

[1] Paragraph **35** of the current NPPF (December 2024).

Main Findings - Executive Summary

In this report I have concluded that the draft Oxford City Council Community Infrastructure Levy Charging Schedule provides an appropriate basis for the collection of the levy in the area.

The Council has provided sufficient evidence that shows the proposed rate would not threaten delivery of Office and Research & Development business in Oxford.

Introduction

1. I have been appointed by Oxford City Council, the charging authority, to examine the draft Oxford Community Infrastructure Levy (CIL) Charging Schedule. I am a chartered town planner with more than 25 years' experience inspecting and examining Development Plans and CIL Charging Schedules as a Government Planning Inspector.

2. This report contains my assessment of the Charging Schedule in terms of compliance with the requirements in Part 11 of the Planning Act 2008 as amended ('the Act') and the Community Infrastructure Regulations 2010 as amended ('the Regulations').[2] Section 212(4) of the Act terms these collectively as the "drafting requirements". I have also had regard to the National Planning Policy Framework (NPPF) and the CIL section of the Planning Practice Guidance (PPG).[3]

3. To comply with the relevant legislation, the submitted Charging Schedule must strike what appears to the charging authority to be an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the district. The PPG states[4] that the examiner should establish that:

    - the charging authority has complied with the legislative requirements set out in the Act and the Regulations;

    - the draft charging schedule is supported by background documents containing appropriate available evidence;

[2] The Regulations have been updated through numerous statutory instruments since 2010, most notably through the Community Infrastructure Levy (Amendment) (England)(No. 2) Regulations 2019.
[3] The CIL section of the PPG was substantially updated on 1 September 2019, and most recently updated 26 April 2024. At the time of completion of the examination, no further updates have been made to the CIL section of the PPG following publication of the December 2024 NPPF. For example, in relation to Development contributions, the paragraph referenced in the current PPG as 34 is now paragraph **35** (albeit the text remains unchanged).
[4] See PPG Reference ID: 25-040-20190901.

- the charging authority has undertaken an appropriate level of consultation;

- the proposed rate or rates are informed by, and consistent with, the evidence on viability across the charging authority's area; and

- evidence has been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see NPPF paragraph 34[5]).

4. The basis for the examination, on which a hearing session was held 31 March 2025, is the submitted schedule of 12 February 2025.[6]

5. There is an existing CIL in place for Oxford, originally set in 2013.[7] In late 2023 the Council consulted on a partial review to the existing CIL. The consultation noted that the main CIL conclusion reached in a viability assessment undertaken in relation to the emerging Local Plan was that most use classes would not be able to absorb an increased CIL in the light of the proposed Local Plan policies. For this reason, the review was a partial one with the modifications originally limited to changes proposed for three of the existing rates. The three were Class E (g) Office and R&D, Class B2 General industrial and Class B Storage or distribution. The proposed new rate for all three was £168.74 per square metre (sq.m) taking into account indexation of CIL rates in 2024.[8] Taking indexation into account, the existing rate is £33.74 per sq.m. In 2024 further viability work was undertaken resulting in a change to the proposals. The current proposals are now to retain the existing rate for general industrial and storage or distribution at £33.74 per sq.m but to increase the rate for offices and R&D development to £168.74 per sq.m as per the 2023/2024 partial review consultation.

6. As the only rates that are being proposed for revision in this partial review are those relating to office and R&D developments, this examination and report deals solely with the office and R&D CIL rate.

7. Between 10 November 2023 and 5 January 2024 a consultation exercise was conducted on a partial review of the Oxford City CIL. This exercise produced 19 representations. As a consequence of the responses a Statement of Modifications was produced. The modification statement was published for consultation between 12 February 2025 and 12 March 2025. All parties who

[5] Paragraph **35** of the current NPPF (December 2024).
[6] Oxford City Council initially submitted the CIL Charging Schedule to the Planning Inspectorate on 27 June 2024. However, in the absence of the appointment of an Inspector, the same schedule and supporting documentation was submitted to independent examiner Keith Holland (of Intelligent Plans and examinations) on 12 February 2025.
[7] View at: https://www.oxford.gov.uk/community-infrastructure-levy/community-infrastructure-levy-oxford
[8] The rate will increase again with 2025 indexation when the CIL is adopted.

responded to the November 2023 – January 2024 consultation were notified of the modification statement consultation; 1 response was received.[9]

Has the charging authority complied with the legislative requirements set out in the Act and the Regulations, including undertaking an appropriate level of consultation?

8. The Charging Schedule complies with the Act and the Regulations, including in respect of the statutory processes and public consultation, consistency with the adopted Local Plan and the Infrastructure Delivery Plan, and is supported by an adequate financial appraisal. I also consider it compliant with the national policy and guidance contained in the NPPF and PPG respectively.

Is the draft charging schedule supported by background documents containing appropriate available evidence?

Infrastructure Planning Evidence

9. The existing Oxford Local Plan 2016 – 2036 is scheduled to be updated. Evidence relating to infrastructure and the funding required was prepared for the updating of the Local Plan. The updated Local Plan was submitted to the Secretary of State for examination but has now been withdrawn for reasons relating to housing and the duty to co-operate. For the purposes of the updated Local Plan examination, as at October 2023, the Council estimated that there is an infrastructure funding gap of over £950,000,000. Assuming a CIL of £168.74 per sq.m for office and R&D development and based on information regarding anticipated developments as outlined in the emerging Local Plan, the Council expects office development to generate approaching £13,000,000 and R&D development to generate nearly £23,000,000. There is no challenge to the scale of the infrastructure gap or the clear need for a CIL in Oxford. The proposed increased charges are expected to make a limited but important contribution to filling the large infrastructure funding gap.

Economic Viability Evidence

10. The Council commissioned BNP Paribas to undertake a Local Plan viability assessment (VA). Included in this work was consideration of the need and scope for alternative CIL rates. BNP Paribas produced their VA in July 2023. In the light of concerns raised in the consultation process that the testing of office and R&D developments in the VA was not site-specific enough, further evidence was sought. In April 2024 BNP Paribas provided an Addendum Note (AN) dealing with the CIL rate options for office/R&D developments.

[9] All relevant consultation, submission and examination documentation may be viewed at: https://www.oxford.gov.uk/community-infrastructure-levy/cil-partial-review-examination-library

The further testing involved 18 sites some in the City Centre and others outside the centre. Most of the sites tested had been subject to planning applications, ten of which had been approved. Part of the justification of the AN was that rents had changed, particularly for R&D schemes. The material changes from the 2023 VA were an increase in office rents per sq.m from £340 - £565 to £540 - £590, an investment yield of 5.75% city wide (as opposed to 6.00% outside the City Centre) and increased construction costs from £3,123 to £3,279 per sq.m.

11. The VA followed the conventional approach of examining the viability of development typologies. For the purposes of the VA, the typologies relevant to this partial review involved floorspace of 2,500 and 5,000 square metres. The rents assumed were based on lettings of similar floorspace in the City between November 2019 and November 2022. For both typologies a rent-free period of 12 months was assumed.

12. For base build costs Building Cost Information Service (BCIS) figures were used with upper quartile figures applied in the City Centre to take account of the nature of the City Centre environment. An additional 10% allowance was provided for external works including car parking spaces. Additional costs relating to zero carbon and BREEAM were also taken into account. A comprehensive range of other development costs such as s106 contributions, development finance and professional fees were added to the base costs. The assumptions made in relation to these costs follow well established practice. For commercial development, the VA assumes a profit level of 15% of Gross Development Value (GDV). This level of profit is frequently assumed in viability work.

13. For benchmark land values BNP Paribas point out that existing use values are relevant. For the land to come forward for development, viability studies logically assume a premium above existing use value. The range of benchmark figures identified by BNP Paribas in Oxford is extremely wide, ranging from £370,000 to £7,630,000 per gross hectare. The lower benchmark relates to large, predominantly greenfield or vacant urban land while the higher figures are based on secondary office/retail buildings that are reaching the end of their economic life. The VA provides full details of how land in office/retail and industrial use has been valued using relevant rents, yields and assumptions. For cleared sites, undeveloped land and agricultural land the VA uses a multiple of fifteen times agricultural value. The resulting benchmarks per gross hectare are £7.63 million for secondary office land; £4.21 million for secondary retail land; £1.61 million for secondary industrial land; and £0.37 million for greenfield/open land.

14. The draft Charging Schedule is supported by detailed evidence of community infrastructure needs. On this basis, the evidence which has been used to inform the Charging Schedule is robust, proportionate and appropriate.

Are the proposed rates informed by and consistent with the evidence on viability across the charging authority's area?

Commercial Rate

15. The AN produced by BNP Paribas provides a much more comprehensive and up-to date view of potential CIL rates for office/R&D development than did the VA. The AN records recent evidence of office/R&D rents. The up-dated evidence shows that rents outside the City Centre are closely comparable to rents in the City Centre. January 2024 evidence from Bidwells shows rising rents for office and office/laboratory space with levels for prime fitted R&D space over £75 per square foot (sq.ft) and prime office space at £60per sq.ft. There are similar figures from August 2023 from Savills.

16. Potential CIL headroom for offices and R&D development is calculated by BNP Paribas in the AN based on rents of £55per sq.ft and £50 per sq.ft. Eighteen sites of various sorts in varied locations with a wide range of benchmark land values are included. All of the sites, bar one, show that there is a considerable amount of headroom. In a high proportion of cases with rents at £55per sq.ft the headroom either exceeds or is close to £2000per sq.m. With the lower rent of £50per sq.ft the majority of the sites show headroom of around £1500per sq.m or more.

17. BNP Paribas has also tested office development using secondary office market rent levels of about £45per sq.ft. This is broadly the rent level for new secondary offices. At this rent level most of the tested schemes could readily accommodate a CIL of £168.74 per sq.m. The viability of office development does not become challenging until rental levels fall to just over £31 per sq.ft. This level of rent is likely to be relevant to existing office rather than new office development.

18. It is important to note that the headroom identified needs to fund both CIL and any Cowley Branch Line contributions that may be sought. A viability buffer will also need to be provided. Although the proposed CIL rate of £168.74 per sq.m is considerably higher than the current indexed rate £33.74 per sq.m the evidence is that across all sites tested at both rental levels the average surplus is over £1100 per sq.m. The Cowley Branch Line is an aspiration that I understand is built into relevant s106 agreements at a rate of £36 per sq.m.

Has evidence been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see National Planning Policy Framework paragraph 34[10])?

19. The Council's decision to is based on a comprehensive set of assumptions about development values and likely costs.

[10] Paragraph 35 of the current NPPF (December 2024).

20. The existing agricultural use value and the premium multiplier have been challenged as have the assumptions about development costs, developers profit, infrastructure costs and the allowance for external works. There have also been challenges to the transparency of the VA evidence and the timing of the introduction of a revised CIL rate. The scale of the increase in the proposed CIL rate is raised by several as an issue of major concern.

21. The contentions about transparency and timing are not accepted. In relation to transparency the national Planning Policy Guidance requires a broad area-based approach using appropriate available evidence. BNP Paribas in the VA sets out a comprehensive range of assumptions used in the assessment. Rents and yields used are dealt with. In terms of costs build the base costs are explained and a range of additional costs including zero carbon and BREEAM, accessibility standards, biodiversity net gain and s106 costs are detailed. The way exceptional costs are dealt with is set out as are the assumptions about developers profit. BNP Paribas use an approach to explain how they have reached their viability conclusions that has been tried and found acceptable in a number of CIL examinations. A lack of transparency criticism could be directed at the initial VA as it only tested two offices/R&D typologies and did not undertake any site-specific testing. The AN corrects this by testing 19 sites.

22. As regards the timing of the partial review, no point would be served in delaying the partial review until the emerging Local Plan has been adopted. The emerging Local Plan was withdrawn from examination because of a concern from the examining Inspectors about the delivery of housing and the duty to co-operate. In relation to non-residential development, the broad thrust of the emerging Local Plan is unlikely to be radically revised, not least because the Council is anxious to have an up-to-date Local Plan in place as soon as possible. Given this situation and the current evidence about rental levels for offices and R&D development, it is sensible for the Council to review the CIL rate for these types of development at this stage in the interests of getting an appropriate level of funding for much needed infrastructure.

23. A comparison is drawn in one representation to other rates in the South East, notably those in the Oxford Cambridge Arc. The comparison with Cambridge is, in practice, pointless as Cambridge does not operate a CIL policy and makes arrangements for the delivery of infrastructure on an entirely different basis. The comparison drawn with a number of other authorities in the Oxford Cambridge Arc that do operate a CIL is also unhelpful. There is no point in quoting local authorities that have completely different economic characteristics and drivers compared to Oxford.

24. As regards benchmark land values, it is appropriate for the viability testing to be based on broad evidence rather than on evidence from a limited number of property transactions. This is because the aspirations and requirements of both buyers and sellers can be very varied. A transaction may for example reflect an urgent need on the part of the purchaser to acquire land. On the other hand, it could reflect a need for the vendor to raise capital. These

considerations are relevant to the premium applied to establish benchmark values. This is why it is sensible to apply a mid-point premium to broad agricultural land values when considering benchmark values on greenfield sites.

25. On developers profit, the figure used in the VA reflects a standard approach. There is no convincing evidence of additional risk factors in Oxford that might justify a higher profit margin. The Council regards the market for office/R&D in the City as healthy and this view is supported by the number of large proposals that are under way, have planning permission or are currently subject to planning applications.

26. Some challenge the finance cost assumption and say that, in the current market, the figure should be between 8 and 10%. I accept BNP Paribas's point that small developers, particularly residential developers, may sometimes have to pay 8% or more but that developers who are likely to build substantial office/R&D schemes can usually obtain finance at or close to a long-term figure of 6.5%.

27. Regarding build costs, BNP Paribas use higher quartile BCIS figures. The use of this source of information is common in viability work and in line with the advice in the PPG. In viability work, it is not unusual to see lower quartile figures used on the grounds that larger developments can achieve economies of scale. Using higher quartile figures reflects the expected quality of office/R&D proposals in Oxford. There is a challenge by Savills to the build cost figures on the basis of a laboratory/life sciences development that had a build cost, at £427 per sq.ft., which is much higher than the BCIS figure. This argument is countered by BNP Paribas who point out that a 2024 Carter Jonas "Life Sciences Research Report" quotes rental levels of over £100 per sq.ft whereas the BNP Paribas work is based on a cautious £50 - £55 per sq.ft. BNP Paribas have re-run their appraisals for seven of the schemes tested using Savills Lab-enable Space costs of £427 with rents at £78.50 per square foot and a yield of 4.75%. The yield figure is based on Bidwells Databook – Oxford Offices and Labs February 2025. The results show that the proposed CIL rate would amount to less than 10% of the identified CIL headroom in the worst case. BNP Paribas dispute several of the assumptions used by Savills, in particular sustainability costs and the lettable area figures. As BNP Paribas point out, even if Savills' assumptions are accepted, in six out of seven cases the surpluses generated far exceed the proposed CIL rate.

28. In relation to the increase in the rate, the argument advanced is that the 500% increase represents too great a jump and is therefore a threat to the delivery of the Council's policies. The fact that the proposed rate is significantly higher than the existing rate is not in itself a reason for rejecting the proposed CIL. The critical considerations are current values and the viability of development at the present time.

29. I do not believe that there is any convincing evidence that the proposed rate would threaten the delivery of office/R&D development in the City. Even based on conservative rent figures the BNP Paribas evidence shows that the

surplus available to fund CIL and the Cowley Branch Line is very substantial. A very large viability buffer would be available at the proposed CIL rate. Furthermore Oxford operate an exceptional circumstances relief policy that can be used in circumstances where viability evidence provides a justification for not applying the standard CIL rate.

30. The proposed CIL rate represents at most 2.6% of development costs and it is unreasonable to argue that this level of increase is likely to be a decisive consideration in an area such as Oxford where the office/R&D market is strong.

31. There are representations that challenge the Charitable CIL relief. Charitable relief is mandatory and not a matter for consideration in this report.

32. In setting the CIL charging rate the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in Oxford**.** The Council has set a commendable simple rate that is realistic in terms of achieving a reasonable level of income to address an acknowledged gap in infrastructure funding, while ensuring that office/R&D development remains viable across the City.

33. I consider the viability assessment to be robust and conclude that the rate proposed would not threaten delivery of office/R&D development in Oxford. The proposed rates are justified, therefore.

Overall Conclusion

34. I conclude that the partial review of the draft Oxford City Community Infrastructure Levy Charging Schedule, satisfies the drafting requirements and I therefore recommend that the draft Charging Schedule be approved.

Keith Holland

Keith Holland BA (Hons) Dip TP MRTPI ARICS
Examiner

To:	**Cabinet**
Date:	18th June 2025
Report of:	Sobia Afridi – Diversity and Inclusion Specialist
Title of Report:	Positive Action Policy

Summary and recommendations	
Decision being taken:	To agree to the proposed Positive Action Policy
Key decision:	No
Cabinet Member:	Councillor Nigel Chapman, Cabinet Member for Focused Services and Council Companies
Corporate Priority:	Well Run Council
Policy Framework:	Recruitment Policy

Recommendation(s): That Cabinet resolves to:

1. **Approve** this policy to go forward to Council for approval, publication and use.

Information Exempt From Publication
N/A

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Positive Action Policy	No
Appendix 2	Equalities Impact Assessment	No

Introduction and background

1. Oxford City Council is committed to promoting equality, diversity and inclusion within our community and workforce. This Positive Action Policy outlines our commitment to taking proactive steps to address underrepresentation and ensure diversity in employment opportunities. We take positive action to create a fairer work environment where everyone has the chance to succeed. We adopt these approaches to create a more diverse workforce that reflects the community we serve.

2. Our annual workforce equalities report has identified underrepresentation of minority ethnic groups across most service areas and underrepresentation of minority ethnic groups, women and employees with a disability at senior levels. This policy will help us to improve the diversity of the organisation at all levels and is part of the current diversity and inclusion action plan.

What does this Policy Cover?

3. This policy allows the Council to take proportionate measures to tackle underrepresentation in our workforce of groups who share a 'protected characteristic' (for example, race, sex, or minority ethnic group).

Why do we need this Policy?

4. **Promoting Equality**: It helps to address and reduce inequalities in the workplace by providing support to underrepresented or disadvantaged groups. This can include training, mentoring, or other initiatives designed to level the playing field.

5**. Enhancing Diversity**: By encouraging a more diverse workforce, positive action can bring a variety of perspectives and ideas, which can lead to more innovative solutions and better decision-making.

6. **Improving Organisational Culture**: It fosters an inclusive environment where all employees feel valued and supported, which can improve morale, job satisfaction, and retention rates.

7. **Addressing Disadvantages**: Positive action can help to rectify disadvantages faced by certain groups, ensuring that everyone has an equal opportunity to succeed.

8. **Alternative Options Considered**

No alternative options were considered.

Consultation and communication

9. We have consulted with the Trade Unions, our Corporate Leadership Team and our internal Staff Networks.

- We will publish the policy on the Staff Intranet and via Published News. We will roll this out via the Hiring Managers' Network and also in any upcoming relevant Leadership Conversations.

- We will monitor the impact of this policy by reviewing our workforce profile data and gaining feedback from managers within the first 6 months.

Financial implications

10. There are no financial implications.

Legal issues

11. The Equality Act 2010, section 149 introduced the Public Sector Equality Duty. It requires that in everything the Council does, must have due regard to: the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Act; the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Level of risk

12. N/A

Equalities impact

13. Please see Annex 2: Equalities Impact Assessment.

Carbon and Environmental Considerations

14. N/A

Conclusion

15. For the Council to improve the diversity of the workforce and support its objective to improve inclusion, it is proposed that positive action becomes formalised as policy.

Report author	Sobia Afridi
Job title	EDI Specialist
Service area or department	People Services
Telephone	01865 529338
e-mail	safridi@oxford.gov.uk

Background Papers: N/A
1 List all/any background papers
2
3

4

Positive Action Policy

1 Policy Statement 1
2 Scope 2
3 Positive Action 2
What is positive action? 2
Why do we take positive action? 2
How is it different to positive discrimination? 2
4 How to apply positive action 2
Targeted support 3
What is it? 3
How can it be applied? 3
Seeking diverse candidates when recruiting 3
What is it? 3
How can it be applied? 3
Bias-free job descriptions 3
What is it? 3
How can it be applied? 3
Anonymous recruitment 4
What is it? 4
How can it be applied? 4
Diverse interview panel 4
What is it? 4
How can it be applied? 4
Inclusive interview questions 4
What is it? 4
How can it be applied? 4
Tie-break rule 5
What is it? 5
How can it be applied? 5
5 Roles and responsibilities 5
All employees 5
Leaders 5

People Team 6
6 Useful resources 6

1 Policy Statement

1.1 Oxford City Council is committed to promoting equality, diversity and inclusion within our workforce. This Positive Action Policy outlines our commitment to taking proactive steps to address underrepresentation of groups in our workforce that share a protected characteristic and provide greater diversity in our Council teams

1.2 Protected characteristics include:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or belief
- Sex.

2 Scope

2.1 This policy applies to all employees and job applicants.

3 Positive Action

What is positive action?

3.1 Positive action refers to proportionate measures to help individuals from underrepresented or disadvantaged groups to overcome barriers and gain employment.

3.2 This can include targeted training, mentorship, and recruitment strategies aimed at improving diversity and inclusion.

Why do we take positive action?

3.3 We take positive action to create a fairer work environment where everyone has the chance to succeed.

3.4 We adopt these approaches to create a more diverse workforce that reflects the community we serve.

How is it different to positive discrimination?

3.5 Positive discrimination involves giving preferential treatment to individuals based solely on their protected characteristics and not considering their skills or abilities, for example by promoting a less qualified candidate over someone more qualified solely to increase representation of a particular group.

3.6 Under the Equality Act 2010 it is unlawful to positively discriminate in the workplace.

4 How to apply positive action

4.1 In line with the Council's Equality, Diversity and Inclusion Strategy, managers are encouraged to address underrepresentation within their teams or service areas by adopting the following practices.

Targeted support

What is it?

4.2 Targeted support refers to the provision of specific training or support to individuals with a particular protected characteristic to help them overcome barriers or disadvantage.

How can it be applied?

4.3 When identifying training needs for a team, consider any specific training for those from underrepresented groups.

4.4 An example would be to offer specialised training and development programmes such as leadership courses specifically for women, people from minority ethnic groups, or employees with disabilities.

Seeking diverse candidates when recruiting

What is it?

4.5 This refers to taking proactive steps during the recruitment process to seek out candidates from underrepresented groups.

How can it be applied?

4.6 It can be applied by partnering with community organisations, attending diversity-focused job fairs, and posting job openings on diverse job boards.

4.7 An example of this in practice at the Council can be seen through our Internship and Graduate schemes, where we work with two local universities.

4.8 Another example of recruitment action is through the apprenticeship scheme. Hiring managers are encouraged to work with communities and schools where there is a diverse group of potential applicants.

Bias-free job descriptions

What is it?

4.9 This is the practice of reviewing job descriptions and job adverts to ensure they use inclusive language, focus on essential skills and qualifications, avoid gendered language and any other requirements that may inadvertently exclude certain groups such as Minority Ethnic groups and other protected characterises.

How can it be applied?

4.10 By using our template that follows inclusive language guidelines and removes unnecessary barriers.

4.11 As an example of things to consider on a job description, under ‘Core Skills and Competencies’, managers should avoid inflated requirements that could discourage candidates from a more diverse range of backgrounds. For instance, instead of saying ‘10+ years of experience required’, a more inclusive approach is ‘Experience in [identify the specific skills] is needed. Equivalent experience is welcome’.

Anonymous recruitment

What is it?

4.12 Anonymous recruitment, also known as blind hiring, is a process that removes personal information from job applications to reduce unconscious bias and ensure fair candidate selection. It focuses only on skills, experience, and qualifications, rather than personal details like name, gender, age, or ethnicity.

How can it be applied?

4.13 Anonymised recruitment can be applied through the removal of names, gender and age from applications.

4.14 Oxford City Council standard procedure removes names, gender and age from applications.

Diverse interview panel

What is it?

4.15 A diverse interview panel includes interviewers from different backgrounds, experiences, and perspectives. This is proven to reduce unconscious bias, improve candidate experience, and increase workplace diversity.

How can it be applied?

4.16 When appointing an interview panel, hiring managers should make sure it is diverse and represents a range of protected characteristics.

Inclusive interview questions

What is it?

4.17 This involves the use of structured interview questions that focus on skills and experiences relevant to the job.

4.18 Inclusive interview questions ensure fairness, diversity, and inclusion by assessing a candidate’s skills, experiences, and values without introducing bias. Using inclusive questions creates a welcoming environment and allows all candidates, regardless of background, to showcase their potential. To maintain a fair and consistent recruitment process, all candidates should be asked the same set of questions in the same order. The questions should focus solely on each candidate’s relevant experience and skills for the role. Relevant skills and experience might be gained in roles different to the job being recruited to and there will be some elements of the role where training can be provided easily. Questions relating to personal life should be avoided.

How can it be applied?

4.19 Hiring managers should discuss and agree interview questions with the diverse interview panel, creating questions that are focused on the requirements of the role.

4.20 The panel should ensure that all candidates are asked the same questions to provide a fair selection process by assessing each candidate on the same criteria.

Tie-break rule

What is it?

4.21 The ‘tie-break’ rule allows a hiring manager to favour a candidate with a protected characteristic over another equally qualified candidate, if that characteristic is underrepresented.. This rule can only be applied where the candidates are of equal merit.

How can it be applied?

4.22 Where two candidates have identical level of qualifications, experience and interview performance, but one candidate has an underrepresented protected characteristic, that individual could be offered the role.

4.23 For example, this could be applied in a scenario where the hiring manager has identified that individuals from minority ethnic backgrounds were underrepresented in the workforce and, after a thorough recruitment process, had two final candidates who were equally qualified and performed equally well in interviews.

If one of the candidates was from a minority ethnic background and the other was not, the hiring manager could use the 'tie-break' rule to offer the job to the candidate from an minority ethnic background. This decision would help to address the underrepresentation of minority ethnic groups in the workforce and is lawful under the Equality Act 2010.

5 Roles and responsibilities

All employees

5.1 Council staff are all responsible for:

- Fostering an inclusive culture by encouraging, valuing and supporting diverse perspectives.
- Championing equity, diversity, and inclusion (EDI) by actively promoting EDI principles within their teams and across the Council.

Leaders

5.2 Leaders and managers at the Council are responsible for:

- Providing strategic direction and oversight to ensure that Equality, Diversity, and Inclusion (EDI) principles are embedded in all council activities.
- Embedding inclusive recruitment practices so that they become normal management practices to reduce bias and encourage diverse candidate pools.

- Delivering the outcomes of EDI initiatives and ensuring alignment with the Council's broader strategic objectives.
- Ensuring all staff, particularly those involved in recruitment and leadership, receive appropriate training on EDI

People Team

5.3 The People Team are responsible for:

- Ensuring that staff are fully informed about the Positive Action Policy and understand its purpose and application.
- Providing ongoing support and guidance to managers and staff on how to effectively apply the Positive Action Policy
- Regularly reviewing workforce and community demographics to identify areas of underrepresentation.
- Setting measurable targets for improving diversity and inclusion.
- Reporting on progress annually and adjusting people strategies as needed.
- Promoting opportunities through staff networks

6 Useful resources

6.1 For more support and information please follow these links:

- https://www.gov.uk/government/publications/positive-action-in-the-workplace-guidance-for-employers/positive-action-in-the-workplace
- Equality and Human Rights Commission Employment: Statutory Code of Practice
- Acas the Advisory, Conciliation and Arbitration Service
- The Equality Advisory and Support Service provides free and accessible advice about the Equality Act 2010 to individuals in England, Scotland, and Wales.
- Equality Act 2010: A quick start guide to positive action in service provision for voluntary and community organisations (PDF) ↩

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Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010).**

   The General PSED enables Oxford City Council to:

   a. **identify and remove discrimination,**

   b. **identify ways to advance equality of opportunity,**

   c. **foster good relations.**

2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.

3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.

4. We are passionate about equalities, and we highly recommend that Corporate Management Team (CMT) reports and all projects must attach an EqIA.

1003

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. **Age**	6. **Race & Ethnicity**
2. **Disability**	7. **Religion or Belief**
3. **Gender Reassignment**	8. **Sex**
4. **Marriage & Civil Partnership**	9. **Sexual Orientation**
5. **Pregnancy & Maternity**	**NEW- Socio-economic inequalities (voluntary adoption)**

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	**Name of activity being assessed.** New Positive Action Policy		**2.**	**The implementation date of the activity under consideration:**	July 2025
3.	**Directorate/Department(s):**	FORMTEXT People Services	**4.**	**Service Area(s):**	People Services
5.	**Who is (are) the assessment lead(s):** **Please provide:** -Name -Email address	Sobia Afridi Safridi@oxford.gov.uk	**6.**	**Contact details, in case there are queries:** **Please provide:** -Name -Email address	**Error! Bookmark not defined.**
7.	**Is this a new or ongoing EqIA?**	New as it is a new policy ☐ ☐	**8.**	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	N/A
9.	**Date this EqIA started:**	25/4/25			
10.	**Will this EqIA be attached to** Corporate Management Team (CMT) **reports/updates, which will be published online?**	Will be attached to the cabinet report can be published if required.	**11.**	**Give a date (tentative or otherwise) when this assessment will be taken to the** CMT.	Policy has been taken to CLT 7/4/25

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Section 2: About the activity, change, or policy that is being assessed.

12.	**Type of activity being considered:** Check the most appropriate.	☐ Budget	☐ Decommissioning	☐ Commissioning	☐ Change to an existing activity.
		X ☐ **New Activity**	☐ Others. Please specify:		
13.	**Which priority area(s) within Oxford City Council's Corporate strategy (2024-2028) does this activity fulfil?** Please check as needed.	☐ Good, affordable homes N/A	☐ Strong, fair economy N/A	☐ Thriving Communities N/A	☐ Zero Carbon Oxford N/A	☐ Well run council Yes
14.	**Which priority area(s) within Oxford City Council's Equality, Diversity & Inclusion Strategy (2022) does this activity fulfil?** Please check as needed.	☐ Responsive services and customer care. N/A	☐ Diverse and engaged workforce. Yes	☐ Leadership & organisational commitment. N/A	☐ Understanding and working with our communities. N/A
15.	**Outline the aims, objectives, & priorities of the activity being considered.**	Promote equity by providing a process for supporting equal opportunities for all individuals regardless of their background. Enhance diversity of the workforce and foster a diverse working environment that reflects the community we serve. Improve representation by supporting opportunities for under-represented groups in each service area.			

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16.	**Please outline the consequences of not implementing this activity.** **For example,** -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, … to name a few.	**Inequality**: Existing barriers and biases may persist, resulting in unequal opportunities and treatment for certain groups. **Reduced Innovation**: Diverse teams are known to drive innovation and creativity. A lack of diversity can stifle new ideas and perspectives. **Poor Reputation**: Organisations that fail to promote equality and diversity may suffer reputational damage, affecting their ability to attract talent and customers. **Low Morale**: Employees or members of the community may feel undervalued and disengaged, leading to lower morale and productivity.

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	**Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?** **Please provide details—** -when, -how many, and -the approach taken.	The policy was taken to the following groups: Corporate Leadership Team The Trade Unions Staff Networks The policy has been received positively.
18.	**List information and data used to understand who your residents or staff are and how they will be impacted.** **These could be-** -third-party research, -census data, -legislation, -articles, -reports,	We have reviewed a range of data to include: Data from our Annual Workforce Report Data for the workforce profile for senior roles at Grade 11 Impact of the positive action management development programme, Aspiring Managers The data shows that there is still work to be done around increasing the diversity of the workforce so that it better represents the communities we serve and improving representation of women, people from minority ethnic groups and those with a disability at senior levels. Actions will include more targeted work to build inclusive recruitment practices. The implementation of a Positive Action Policy will support this work and outline the Council's commitment to diversity and inclusion.

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	-briefs.	The Workforce Equalities report has highlighted we have significant gaps in representation of certain groups at senior levels of the organisation. Positive action is a way of tacking inequity and improving diversity in management and leadership roles. By helping people at the start of their careers we can set them on the right path to becoming leaders of the future. When we look at our workforce profile in the latest Workforce Equalities report, we can see that: • Around 60% of the workforce is female but only 50% of senior roles are occupied by women • Around 14% of the workforce is from a minority ethnic background but only 9% of senior roles are occupied by employees from minority ethnic groups. • Around 12% of the workforce have a disability but only 2% of senior roles are occupied by those with a disability We have already seen success with a number of promotions from the Aspiring Managers programme (a positive action initiative) and there are benefits to all of those who have attended. Also, this initiative has sent important messages to other staff. The impact has been very positive.
19.	**If you have not done any consultations or collected data & information, are you planning to do so in the future?** **Please list the details –** -when, -with whom, and -how long will you collect the relevant data.	N/A

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Section 4: Impact analysis.

20.	**Who does the activity impact?**	**Service Users**	Yes ☐	**No X**☐	Don't Know ☐
	Check as needed.	**Members of staff**	**Yes** X☐	No ☐	Don't Know ☐

	The impact may be positive, negative or unknown.	General public	**Yes** X☐	No ☐	Don't Know ☐
		Partner / Community Organisation	Yes ☐	**No X** ☐	Don't Know ☐
		City Councillors	Yes ☐	**No** X ☐	Don't Know ☐
		Council suppliers and contractors	Yes ☐	No X☐	Don't Know ☐

21. **Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?**

As mentioned above in point 18 we have done are research into workforce data. This policy is to encourage protected characteristics to apply to the council.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age		☐	X☐	☐	Workforce report shows the average employee age is 45, the same as last year and in line with the local population where, at 34% of the total population, the 35-49 age band of Oxford residents is the largest. The largest employee group is the 51-60 age band.	Continue to monitor workforce profile.

Disability **(Visible and invisible)**	☒	☐	☐	☐	10.2% of the workforce declared a disability, a small decrease from last year at 10.4%. This compares well to the local population of 9.2%. Employees with a disability are well represented at lower grades and at senior grades representation has increased from 2% to 5% in 2024. Positive action will help to tackle under-representation at senior levels.	Continue to monitor workforce profile.
Gender re-assignment		☐	X☐	☐	When we look at employee numbers, they are very small. This is not shown in the workforce report. It is not appropriate to report the data because of the small group size.	The Council's approach to inclusion will support all employee groups.
Marriage & Civil Partnership	☐	☐	X	☐	We do not monitor this data.	The Council's approach to inclusion will support all employee groups.
Race, Ethnicity and/or Citizenship	X	☐	☐	☐	The Workforce Equality report shows that employees from minority ethnic groups is 14%. The proportion of people from minority ethnic groups	Positive action can help to tackle under-representation. We will establish clear, objective criteria for

Page 609
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OXFORD CITY COUNCIL

1010					applying for jobs has increased from 32% to 39.8%. The proportion appointed has increased to 18.5% from 14% last year. Ethnic minority representation in management roles has increased from 9% to 10% (21% managers have not declared their ethnicity). Census data puts the economically active population from ethnic minority groups at 27.7%. Employees from the majority ethnic group (white) may feel disadvantaged. It is possible that white employees or candidates for jobs may not have as many opportunities.	positive action and it will be evidence led. We will monitor the outcomes of any positive action
Pregnancy & Maternity	☐	☐	X	☐	We do not monitor this data.	The Council's approach to inclusion will support all employee groups.

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Religion or Belief 1011	X☐	☐		☐	34% of the workforce has declared as Christian compared with 41% in Oxford. 29.1% is atheist/humanist/no belief compared to 40% in Oxford and 28.2% of employees have not provided information. 4.4% of the workforce has chosen other, 2.1% is Muslim (Oxford 7.2%) and 0.5% Sikh (Oxford 0.4%).	
Sex	X☐ Female	X☐ Male		☐	Over half of the workforce are women (60%) which is around 10% above that of the population of Oxford at 50.1%. However, women are not represented at the same level in senior roles at grade 11 and above. Positive action in favour of women may disadvantage	We will establish clear, objective criteria for positive action and it will be evidence led. We will monitor the outcomes of any positive action.

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					men and male employees may feel this. Male employees may not have as many opportunities.	
Sexual Orientation 1012	☐	☐	X☐	☐	Workforce report shows: 4.2% of the workforce identifies as bisexual, lesbian or gay. The 2021 census data indicates that 4.7% of economically active residents in Oxford identify as bisexual, lesbian and gay. We have started to collect data on non-binary and trans staff but it is likely that individuals may feel reluctant to share this data before they learn about the organisation's culture	The Council's approach to inclusion will support all employee groups.
Socio-economic inequalities such as: **-** income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	☐	☐	X	☐	The policy demonstrates a commitment to diversity and inclusion and may encourage other groups to apply for posts at the Council. Individuals will see it as a positive step to diversify our workforce.	The Council's approach to inclusion will support all employee groups.

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Other (voluntary consideration) **For example:** Migrant, refugee, or asylum seekers.	☐	☐		☐		
Other **For example:** - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members	☐	☐		☐		

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Section 5: Conclusion(s) of your Full Impact Assessment

22.		**Conclusions.** Implementation of a positive action policy is crucial for fostering an inclusive, diverse, and equitable work environment. A positive action policy will help to address inequity, promote innovation, and improve the Council's reputation as an inclusive employer. By setting clear aims, objectives, and priorities, and addressing potential barriers, we can create a more supportive and dynamic environment that benefits everyone.						
	☐	Stop and reconsider the activity.	☐		Adjust activity before beginning the activity and continue to monitor.	☒	No major change(s) or adjustments and continue with activity but continue to monitor.	☐	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.
10								
23.	**Please explain how you have reached your conclusions above.**		We have reached this conclusion by analysing the potential benefits of implementing a positive action policy and balancing these with the negative consequences of not having a policy. Here is a breakdown of the reasoning: **Benefits of Implementation**: **Promotes Equity**: Ensures everyone has equal opportunities. **Enhances Diversity**: Creates a more inclusive environment. **Improves Representation**: Helps underrepresented groups gain visibility and opportunities.					

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	**Who or which team or service area will be responsible for monitoring equalities impact**? **For example-** - team, -directorate, -service area, -Equalities Steering Group,etc.		People Services, Sobia Afridi		
25.	**Who (individual, team, or service area) will be responsible for carrying out the EqIA review?**		Sobia Afridi		
26.	**How often will the equality impact be reviewed for this activity?** **For example-** -quarterly, -yearly, etc.		Yearly	**27.** **Date when the EqIA will be reviewed again.**	July 2026

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Section 7: Sign-off

Name:

Job Title:

Signature:

Name: Sobia Afridi

Job Title: EDI Specialist

Signature: Sobia Afridi

Name: Full Name

Job Title: Type here

Signature:

Name: Gail Malkin

Job Title: Head of People

Signature: GMalkin

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

1016

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Suggested list of people to include are:

1) Project lead/manager.
2) Head of service area or team.
3) Person who completed the EqIA.
4) EDI Lead.
5) EDI Specialist.
6) For joint projects, please consider the following:
    1. Other project leads
    2. Other service area and/or team lead/managers.

This is not an exhaustive list.

You have now reached the end of the assessment.

Please appended this to any reports and project files for reference.

1017

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