

Oxford Local Plan 2036

Sustainability Appraisal and Habitats Regulations Assessment Post-Adoption Statement

June 2020



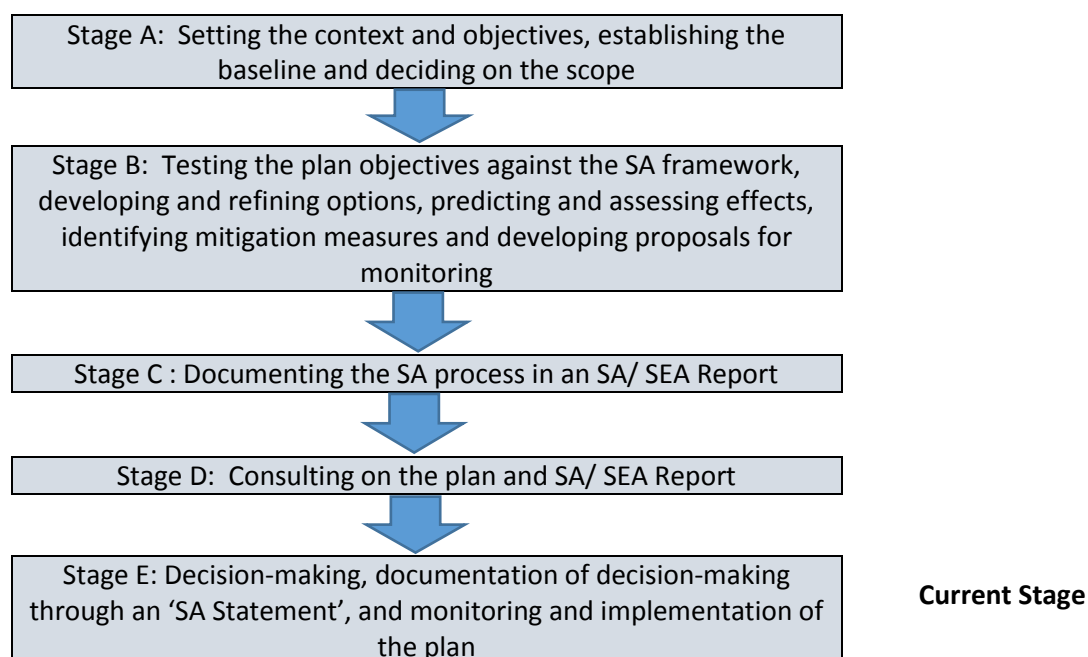
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1. Introduction

- 1.1. Oxford's Local Plan 2036 received a positive Inspector's Report on 18 May 2020 which recommended that the Plan provides an appropriate basis for the planning of the area. The Local Plan 2036 was heard at a Full Council meeting on 08 June 2020 with a recommendation for adoption. As part of the development of the Plan, its effects were assessed through a Sustainability Appraisal (SA) and a Habitat Regulations Assessment (HRA). This report explains how the SA and HRA processes affected the development of the Plan: it is the 'SA Statement' for the Local Plan 2036.
- 1.2. SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. It is required by the Planning and Compulsory Purchase Act 2004, and also incorporates the strategic environmental assessment (SEA) requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. SA/ SEA has five main stages, as shown in Figure 1.1. This report fulfils one of the requirements of Stage E, namely documentation of the decision-making process.
- 1.3. HRA assesses the impact on the Natura 2000 network of internationally important nature conservation sites. It is required by the Conservation of Habitats and Species Regulations 2017 (as amended). This legislation applies the 'precautionary principle' to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited or stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

Figure 1.1: The Sustainability Appraisal/ Strategic Environmental Assessment Process



1.4. Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/ SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SA Statement'; and inform the public and the consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency. The SA Statement must explain:

- a) How sustainability/ environmental considerations have been integrated into the plan;
- b) How the SA/ Environmental Report has been taken into account;
- c) How consultation opinions on the SA/ Environmental Report of the public, consultation bodies and where appropriate transboundary considerations have been taken into account;
- d) The reasons for choosing the plan as adopted, in the light of other reasonable alternatives dealt with; and
- e) The measures that are to be taken to monitor the significant sustainability/ environmental effects of the implementation of the plan or programme.

1.5. This SA statement documents these points, following the structure set out above:

- Section 2, which covers a) above, explains the links between the plan-making and SA/ SEA processes, who carried out the SA/ SEA and what assessment framework was used;
- Section 3, which covers b) above, discusses how the further research and mitigation measures proposed at various stages of the SA/ SEA process were implemented and incorporated into the plan;
- Section 4, which covers c) above, summarises the consultation opinions on the SA/ SEA and describes what changes were made to the SA/ SEA process in response to these comments;
- Section 5, which covers d) above, describes the alternatives/ options considered as part of the Plan development process and how the preferred options were chosen;
- Section 6, which covers e) above, describes how the significant sustainability/ environmental impacts of the Plan will be monitored.
- Section 7 summarises the HRA process for the plan.

1.6. Much of the information in this report is a summary of more detailed reports which were prepared as Core Documents part of the Examination in Public for the Oxford Local Plan 2036, and which are available in full online from:

https://www.oxford.gov.uk/info/20286/local_plan_examination/1312/oxford_local_plan_2016-2036_examination/2

1.7. Documents are given their examination library references for ease of reference.

2. How Environmental/ Sustainability Considerations have been Integrated into the Oxford Local Plan 2036

2.1 The Oxford Local Plan 2036 has gone through a series of pre-production and production stages between January 2016 and June 2020, starting with evidence gathering and issues, then preferred options, proposed submission and examination. The SA was carried out in house, with periodic quality reviews by Levett-Therivel Sustainability Consultants. This has allowed the findings of the SA to be fully integrated into the preparation of the Plan. The links between the Oxford Local Plan 2036 development and the SA/ SEA are shown below in Table 2.1

Table 2.1: Links between the Local Plan 2036 and the SA/ SEA

Date	Plan-making stage	SA/ SEA Stage	Comments
January 2016 – June 2016	Preparation of the <i>First Steps Consultation Booklet and Questions and Background Papers</i>	Preparation of the <i>Sustainability Appraisal Scoping Report Local Plan 2036</i> (incorporating tasks A1-A5)	Local Plan 2036 Background Papers were produced which linked Environmental and Sustainability considerations from the SA Scoping Report to Local Plan issues.
June 2016 - August 2016 (6 weeks ending 5 August 2016)	Consultation on the <i>First Steps Consultation Booklet and Questions and Background Papers</i>	Consultation on the <i>Sustainability Appraisal Scoping Report Local Plan 2036</i>	Updated following comments received. Consultation responses summarised in the Consultation Statement and Appendix (CSD.3)
August 2016 – July 2017	Preparation of the <i>Local Plan 2036 Preferred Options Document</i>	Preparation of the <i>Draft Sustainability Appraisal – Preferred Options</i> (incorporating tasks B1-B3)	
July 2017 - August 2017 (6 weeks ending 25 August 2017)	Consultation on the <i>Local Plan 2036 Preferred Options Document</i>	Consultation on the <i>Draft Sustainability Appraisal – Preferred Options</i>	Consultation responses summarised in the Consultation Statement and Appendix (CSD.3)
August 2017 – October 2018	Preparation of the <i>Oxford Local Plan 2036 Proposed Submission Draft</i>	Preparation of the <i>Sustainability Appraisal and Strategic Environmental Assessment</i> (incorporating Tasks B3-B5 and Task C)	SA Report addressed significant changes since the Preferred Options stage
1 Nov 2018 – 28 Dec 2018	Consultation on the <i>Oxford Local Plan 2036 Proposed Submission Draft</i>	Consultation on the <i>Sustainability Appraisal and Strategic Environmental Assessment</i> (incorporating Task D)	Consultation responses summarised in the Consultation Statement and Appendix (CSD.3)
March 2019	Oxford Local Plan 2036 submitted to	<i>SA Reports</i> submitted alongside the Oxford Local	SAs found at CSD.4 (Non-Technical Summary); CSD.5

Date	Plan-making stage	SA/ SEA Stage	Comments
	Secretary of State for Examination	Plan 2036	(SA Report) and CSD.14 (Preferred Options SA Report)
December 2019	Examination Hearings of Oxford Local Plan 2036		
18 May 2020	Final Inspector's Report received		
08 June 2020	Oxford Local Plan 2036 taken to Full Council for adoption	<i>Sustainability Appraisal and Habitat Regulations Assessment Adoption Statements</i> endorsed as associated documents with the Oxford Local Plan 2036 (incorporating Task E1)	

2.2 An SA/ SEA Framework was used to structure each of the assessment stages. The framework covers all of the environmental topics listed in the Environmental Assessment of Plans and Programmes Regulations 2004, namely, biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The SA Objectives used are shown in Table 2.2.

Table 2.2. SA/ SEA Framework for the Oxford Local Plan 2036

SA Objective	SEA Regulations Topic	Decision-making criteria: will the option proposal help to...
1. To reduce the risk of flooding and the resulting detriment to the public well-being, the economy and the environment	Water, Climatic Factors, Population, Biodiversity, Flora, Fauna, Material Assets, Cultural Heritage (including architectural and archaeological heritage), Landscape	Sustainably manage water run-off to ensure that the risk of flooding is not increased (either on site or downstream) and where possible reduce flood risk;
2. To encourage urban renaissance by improving efficiency in land-use, design and layout and to create and sustain vibrant communities	Material Assets, Cultural Heritage including architectural and archaeological heritage), Landscape	Meet the day to day needs of residents near to where they live; Respect, maintain and strengthen local distinctiveness and sense of place, and promote high quality urban design;
3. To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home	Population, Material Assets	Deliver affordable housing to meet local needs; Provide a mix of dwelling sizes and types to support the local housing market; Meet the needs of specific groups (e.g. elderly, disabled, young, families,

SA Objective	SEA Regulations Topic	Decision-making criteria: will the option proposal help to...
		etc.); Provide housing that is designed and constructed sustainably; Provide housing that is adaptable to meet changing family;
4. To improve the health and well-being of the population and reduce inequalities in health	Population, Human Health	Provide accessible and appropriate healthcare services and facilities for all residents; Provide opportunities to gain access to locally-produced fresh food; Improve Health ranking on the indices of multiple deprivation;
5. To reduce poverty and social exclusion; reduce crime and the fear of crime	Population, Human Health	Minimise opportunities for criminal and anti-social behaviour and the fear of crime; Reduce social exclusion and reduce the number of wards in the most deprived 20%; Reduce disparities in wellbeing across Oxford;
6. To raise educational attainment and develop the opportunities for everyone acquire the skills they need to find and remain in work	Population, Human Health	Provide suitable education for those who require it; Facilitate skills and education enhancement; Reduce disparities in education;
7. To provide accessible essential services and facilities	Population, Material Assets	Increase the provision of essential services and facilities;
8. To provide adequate green infrastructure, leisure and recreational opportunities and make these accessible for all	Biodiversity, Population, Flora, Fauna, Soil, Water, Material Assets, Cultural Heritage including architectural and archaeological heritage), and Landscape	Provide an appropriate range of formal and informal sports and recreation facilities that are accessible to all; Provide a range of cultural, leisure and community facilities that are accessible by all;
9. To conserve and enhance Oxford's biodiversity	Biodiversity, Population, Flora, Fauna, Soil, Water, and Landscape	Protect and enhance internationally, nationally and locally designated habitats; Protect and enhance priority habitats, and the habitat of priority species; Achieve a net gain in biodiversity; Enhance biodiversity through the restoration and creation of well-connected and multifunctional green infrastructure;
10. To protect and enhance the historic environment and heritage assets	Population, Flora, Fauna, Material Assets, Cultural Heritage (including architectural and	Assess, record and plan archaeological features; Preserve and enhance buildings and structures of architectural or historic

SA Objective	SEA Regulations Topic	Decision-making criteria: will the option proposal help to...
	archaeological heritage), Landscape	interest; Preserve and enhance the setting of cultural heritage assets; Support access to, interpretation and understanding of the historic environment; Protect and enhance important views into and out of the city; Protect and enhance the setting of Oxford;
11. To reduce traffic congestion and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry	Biodiversity, Population, Human Health, Flora, Fauna, Soil, Water, Air, Climatic Factors	Actively encourage 'smarter choices' including public transport, cycling and walking; Provide appropriate travel choices for all residents including the needs of specific groups; Improve air quality;
12. To maintain and improve water quality; and manage water resources	Biodiversity, Population, Soil, Water, Material Assets	Protect groundwater, especially in the most sensitive areas (i.e. source protection zones); Maintain and where possible improve water quality; Minimise water consumption and support sustainable levels of water abstraction; Use land efficiently and minimise the loss of best and most versatile agricultural land;
13. To increase energy and resource efficiency (including minimising waste) and renewable energy, with the aim of mitigating climate change	Population, Air, Climatic Factors, Material Assets,	Reduce energy consumption from non-renewable resources; Generate energy from low or zero carbon sources; Minimise carbon and other greenhouse gas emissions; Increase supply of renewable and low-carbon energy; Encourage recycling of household waste; Encourage recycling of materials and minimise consumption of resources during construction;
14. To achieve sustainable economic growth (including the development and expansion of a diverse and knowledge-based economy)	Population, Human Health,	Provide accessible jobs; Provide a range of jobs and premises; Contribute to a low-carbon economy; Ensure an appropriate balance between jobs and housing is delivered; Support the vitality and viability of nearby existing and proposed centres;

SA Objective	SEA Regulations Topic	Decision-making criteria: will the option proposal help to...
15. To encourage the development of a buoyant, sustainable tourism sector	Population, Cultural Heritage	Increase the number of jobs in the tourism sector; Increase the number of visitors staying overnight; Increase the total number of visitors and spend.

2.3 The Oxford Local Plan 2036 also contained a section on Site Allocations. The first step in the process for the Sustainability Appraisal of the Site Allocations was the development of a SA Framework specifically for sites. Table 4.11 of the Sustainability Appraisal and Strategic Environmental Assessment submitted with the Oxford Local Plan 2036 (CSD.5) contains the SA Framework that was used for the site allocations. Table 2.3 duplicates that table here for completeness.

Table 2.3 Sites SA Framework

	Sustainability Objectives														
Site Assessment Criteria	1 Flooding	2 Vibrant Communities	3 Housing	4 Human Health	5 Poverty & Social Excl.	6 Education	7 Services and Facilities	8 Green Spaces, Sports	9 Biodiversity	10 Design & Heritage	11 Transport & Air	12 Water & Soil	13 Efficient use of res.	14 Economy/ Emp.	15 Tourism
Accessibility: vehicle access							x				X				
Accessibility: walking/ cycling		x		x							X				
Accessibility: pub trans (bus)		x		x							X				
Accessibility: pub trans (train)		x		x							X				
Flood Risk	x												x		
Topography									x	x		x			
Contamination				x								x			
Air Quality				x							x				
Neighbouring land uses				x						x					
Distance to: primary school		x	x		x	x	x				x				
Distance to: GP surgery		x	x		x		x				x				
Regeneration		x			x										
Land type		x								x					
Town/ lands-cape character		x						x		x					x
Heritage Assets		x								x					x
Bio/ geo-logical resource								x	x			x			
Green Infrastructure	x	x		x				x	x	x	x	x			x

3. How the Sustainability Appraisal Report has been taken into account

- 3.1 The SA process has helped to identify options for the Oxford Local Plan 2036. This is discussed in more detail at Section 5. This chapter considers influences that the SA had on the development of the Oxford Local Plan 2036.
- 3.2 Because of the tight integration of plan-making and SA discussed at Section 2, it has not always been possible to identify those changes made specifically as a result of the SA: many minor changes/ comments suggested by the SA have been incorporated directly into the Oxford Local Plan 2036 without being formally documented.

SA Report for the Preferred Options Document (CSD.14)

- 3.3 The SA Report of June 2017 assessed the impact of a range of options for policies. The SA findings of the sustainability appraisal were then taken into account in the development of the policies in the Proposed Submission Document. Table 3.1 sets out some examples of how the policies have been shaped by the SA.

Table 3.1: Ways in which the June 2017 SA Report shaped the Proposed Submission Document

SA Objective	How were the SA considerations integrated into the next stage of the Local Plan 2036
1. Flooding	The SA identifies that the level of housing growth proposed could increase the risk of flooding and that in order to ensure redevelopment of previously developed sites in flood zone 3b, the SA highlights that very high standards of mitigation will be required to ensure flood risk does not increase.
2. Vibrant Communities	The SA identified that the general approach of the plan is to intensify development on brownfield sites and includes options for the city and district centres to extend their scope and focus by accommodating a wider range of uses. The SA identifies that the release of Green Belt land with a 'low to moderate' impact on the Green Belt would be likely to have a negative impact on the objective to focus development on brownfield land.
3. Housing	Given Oxford's constrained land supply a broad strategy assessment was undertaken which looked at whether a housing-need focussed strategy or an employment-led strategy should be undertaken. An assessment was also made as to whether the strategy should focus on both housing need and employment growth. This high-level strategic assessment helped to shape the plan's strategy to focus on meeting as much housing need as possible.
4. Human Health	The SA identifies that options regarding affordable housing, primary care facilities and open space, etc. will contribute towards improving human health and well-being.
5. Inequality	The SA identified that the provision of affordable housing, protection of employment sites; the introduction of employment and skills plans, improving healthcare and education facilities and improvements to transport should help to reduce inequality.
6. Education	The SA identified that increasing housing numbers throughout the plan period will result in a need for increased school capacity or potentially

	new schools.
7. Essential services and facilities	The SA identified that the recognition of the multi-functional use of facilities is likely to have a positive impact on essential services and facilities and is likely to sustain their longevity in the longer-term.
8. Green Spaces, Open Air Sports and Leisure	The SA identified that open space should only be used for development if the assessment of Oxford's Green Infrastructure network and sports pitches indicates that it is surplus to requirements and if it will result in re-provision or improvements to public open space in the vicinity.
9. Biodiversity	The SA identified that there could be negative impacts on biodiversity as a result of the preferred options in the plan unless mitigation and habitat creation measures are undertaken as part of new development proposals.
10. Urban Design and Heritage	The SA identified that further design guidance would be required if the preferred options of allowing taller buildings in certain locations was taken forward.
11. Transport, Air	The SA identified that some options are likely to have a positive impact e.g., promoting alternatives to private car use and requiring high standards of energy efficiency and sustainable design in new developments. However, some options would require mitigation of negative effects such as the potential of increasing journeys to employment sites through their intensification.
12. Water and Soil Quality	The SA identified that the effects of the Local Plan 2036 on this objective will largely depend on implementation as there is potential for positive impacts through cleaning up contaminated sites and the potential to create new sources of pollution.
13. Efficient use of resources (including energy/ waste)	The SA identified positives impacts in terms of addressing climate change from including a policy approach that sets specific requirements for design and sustainable construction measures including carbon targets that exceed Building Regulations.
14. Economy, employment land demand and supply	Given Oxford's constrained land supply a broad strategy assessment was undertaken which looked at whether a housing-need focussed strategy or an employment-led strategy should be undertaken. An assessment was also made as to whether the strategy should focus on both housing need and employment growth. This high-level strategic assessment helped to shape the plan's strategy to focus on meeting as much housing need as possible. This has the dual purpose of reducing barriers to economic growth as well as resulting in a strategy to focus new employment development on existing allocated sites and the city and district centres.
15. Sustainable Tourism	The SA identified that the Local Plan options on tourism aim to develop sustainable tourism by only permitting new tourist attractions where they will not increase road congestion however this option may be limited by the need to find land at suitable locations for additional attractions and accommodation within the context of other competing uses.

SA Report for the Proposed Submission Document (September 2018) (CSD.5)

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

3.5 The SA Report for the Preferred Options (Table 8.1 of CSD.14) sets out the proposed mitigation measures for the options that were considered at that stage.

3.6 It was not possible to precisely identify the influence of the SA process, as other inputs to the plan can also influence it. However Table 3.2 shows changes made to the plan, beyond minor changes/ clarifications in wording, that are consistent with the mitigation measures proposed in various rounds of the SA.

Table 3.2: Mitigation measures proposed for policies in September 2018 SA Report for Proposed Submission

Name of Policy	Plan changes consistent with SA mitigation measures
E1. Employment sites	Prevention of loss of any Category 1 sites. Start-up or incubator businesses are permitted if they can demonstrate that they will not negatively impact on the main economic function of the site.
E3. New academic or administrative floorspace	Growth in private colleges expected to lead to no net loss of housing.
E4. Securing opportunities for local employment	Definition in the glossary of what is meant by 'local people'.
H3. Employer-linked affordable housing	Specify that 100% of the housing will meet the definition of affordable housing and be available in perpetuity.
H7. Community-led and self-build housing	More information included in the policy about affordable housing
H8. Provision of new student accommodation	Inclusion of bespoke targets for each university.
H14. Privacy and Daylight	Removal of a '20m rule'.
Adapting to Climate Change	Deletion of policy which overlapped with another policy.
RE1. Sustainable Design and Construction	Inclusion in the supporting text of information about sustainable retrofitting of buildings.
RE2. Efficient Use of Land	Inclusion of suggested density standards for parts of the city, as suggested by the NPPF 2019, but later removal of these standards
RE3. Flood Risk	Increased information about how land affected by the Oxford Flood Alleviation Scheme should be considered.
RE5. Health, wellbeing etc.	Inclusion of information about social exclusion (not just health inequalities) in the introduction and chapter 1
RE6. Air quality	Reference to air pollution impacts on the Oxford Meadows SAC in the explanatory text.
RE7. Managing the impact of development etc.	Removal of partial overlap with policy RE8 re. noise and vibration.
G2. Protection of biodiversity and geodiversity	Wording on sites of local importance for wildlife strengthened, to be more consistent with Policy G7.
DH1. High quality design and placemaking	Inclusion of more information on the design of external areas, including landscaping and public art.
DH2. Views and building heights	Inclusion of requirement for proposals for tall buildings to explain design choices regarding height and massing.
M1. Prioritising walking,	Greater emphasis placed on developers to demonstrate how their

Name of Policy	Plan changes consistent with SA mitigation measures
cycling and public transport	street design ensures a good cycling and walking environment. Clarification that coaches will only drop off and pick up at existing stops, and then must leave the city and go to the longer stay parking area at Redbridge.
M2. Assessing and managing development	Removal of reference to B8 freight consolidation facilities. Reference to car clubs in the explanatory text
M3. Motor vehicle parking	Inclusion of a policy on electric vehicle charging. Reinstatement of deleted reference to employer-linked housing.
M5. Cycle parking	Inclusion of requirement that cycle parking should be well designed Cycle parking standards appendix now refers to electric bike charging.
V6. Cultural and social activities	Inclusion of requirement that cultural and social activities should not adversely affect residential amenity.

3.7 Table 3.3 lists some of the main recommended SA mitigation measures – including measures relating to topics not covered in the plan – which have not been included in the plan.

Table 3.3 Key proposed SA mitigation measures not implemented in the plan

Policy	Key proposed mitigation measures not included in the policy	Reason for lack of inclusion
RE1. Sustainable Design and construction	Clarification about how close to a heat network a development will need to be to be expected to hook up to it.	There is no good rule of thumb for this: depends on whether the ground is hard or soft, and underground conditions and infrastructure.
RE6. Air quality	Specification that exposure to air pollution refers to exposure of ecosystems as well as people. Clarification about what types of mitigation measures might be required where negative air quality impacts are identified, e.g. electric vehicles, car-free development.	General move towards E vehicles is promoted throughout Chapter 7 and mention of the zero emission zone and all of its benefits. Background paper has been written on air quality.
G7. Other green and open spaces	Reference to development not increasing flood risk.	This is covered by the flood risk policies.
DH7. External servicing features	Removal of partial overlap with policy M5 about cycle parking.	There is some overlap, but seems important enough to cover from both angles.
M1. Prioritising walking, cycling and public transport	Clarification of how walking, cycling and public transport should be 'prioritised'.	Demonstrated through commitment to the range of measures such as demand management, change in the use of road space (measures that will be implemented by County Council as Transport Authority). Reduction in car parking policy, provision of bike parking etc.
M3. Motor vehicle parking	The policy makes car-free development dependent on the roll-out of controlled parking zones (CPZs), which gives great uncertainty to developers and	There is a commitment to CPZs from the County Council. It cannot be added to the plan as is not within the City Council's gift to deliver CPZs. A large amount of CIL money has been

Policy	Key proposed mitigation measures not included in the policy	Reason for lack of inclusion
	could have land-owners lobbying against CPZs. It could also encourage car-free development on the edges of CPZs, leading to additional parking problems outside the CPZs. Should it be the other way around, i.e. CPZs will be supported in areas XYZ?	given by the City Council to the County for the expansion of CPZs. There is a CIL 123 list. It is not possible to extend into sites not currently in CPZs because of this list.
M4. Provision of electric charging points	Inclusion of design criteria for electric charging points, especially in the city centre and conservation areas.	Technology is changing so much that not appropriate to be specific. The impacts on conservation areas is covered by policies in the design chapter.
V8. Infrastructure and community facilities	Further information about what is meant by 'infrastructure', and requirements for infrastructure.	Defined in the Infrastructure Delivery Plan, which is referred to by Policy V8.
	Information about situations where existing facilities are under-used.	Not available; possibly monitored by another team
Topics not included in the plan	<ol style="list-style-type: none"> 1. Homeless shelters and generally treatment of homelessness 2. Regeneration areas 3. Driverless cars 4. Public toilets 	<ol style="list-style-type: none"> 1. After discussion with the housing team about homeless strategy it seems that the plan does not require any specific policies or policy wording. 2. The Blackbird Leys area has been re-drawn, but where a regeneration area has few allocated sites or areas of change there is not much scope to write anything into the Plan. 3. At this point no policy approach seems necessary or possible. 4. Public toilets are not really a planning issue

Mitigation for Site Allocation Policies

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

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

3.10 The plan as a whole will affect Green Belt land and will increase urbanization. Policy G9 requires all residential sites larger than 1.5 hectares to provide at least 10% of the site as

public open space. Additionally, policies SP15, 17, 24-30, 39, 44, 53, and 66 all specify that this is required.

- 3.11 For sites on recreational areas (SP5, 12, 14, 33, 39, 41, 44, 53, 62, 65, 66), the plan shows that these sites are currently under-used; that equivalent facilities will be provided, usually on site; and/or that the need for housing outweighs the benefits of keeping the site as a recreational area.
- 3.12 For sites with possible effects on SSSIs (SP17, 19-23, 28, 30, 32-35, 39, 41, 44, 46, 51, 53, 55, 58, 61, 64, 66), the plan requires a combination of biodiversity surveys; demonstration of how harm to biodiversity will be minimized; proof that the development will not adversely affect nearby SSSIs; retention of important trees; provision of a buffer zone to the nearby SSSI; and analysis of specific types of impacts (recreational, change in water levels) will affect the SSSI. Those sites that could affect slow worms and lizards require buffer zones to allow the animals to move around, and/or studies and translocation package.
- 3.13 For sites that could affect conservation areas (SP17, 18, 19, 23, 24, 26, 32, 34, 37, 41, 42, 44, 46, 49, 50, 55, 56, 57, 61, 63, 64), the plan includes requirements that careful design must ensure that development proposals contribute towards the character of the conservation area.
- 3.14 For sites that could affect listed buildings or their settings (SP23, 32, 34, 35, 37, 41, 42, 44, 46, 50, 55, 56, 57, 59, 61, 63, 64), the plan includes requirements that the development must retain and enhance the listed buildings and/or their settings.
- 3.15 For sites where air quality is already regularly poor or likely to become poor; and for sites with sensitive receivers (health care, community centre, school) the policies require the minimisation of impacts on air quality during the construction phase. This applies to SP2, 6, 20, 21, 23, 29, 33, 34, 37, 38, 42, 47, 50, 54, 58.
- 3.16 Sites with permission for B1 and B2 employment uses (SP8-11) require a reduction in car parking provision at the site, and enhancement/promotion of sustainable travel modes. Student and hospital accommodation (SP16, 18-21, 39, 55, 61) are expected to consolidate and minimise their car parking requirements.

Inspector's Report

- 3.17 The Inspector's Report makes several references to the Sustainability Appraisal, both in the context of the main modifications consultation and the SA Report produced to support the proposed submission document. The following paragraphs of the Inspector's Report cite the Sustainability Appraisal:
2. *Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the*

participatory processes and sustainability appraisal that has been undertaken. Where necessary we have highlighted these amendments in the report.

11. Sustainability Appraisal has been carried out

- 35. As far as the city itself is concerned, its character and beauty, heritage, green and blue infrastructure (explained in the plan's glossary), biodiversity and other important environmental issues are adequately protected by the policies in sections 5 and 6 of the plan (subject to the main modifications discussed later in this report); this is clearly evident from the Sustainability Appraisal (CSD.4 and CSD.5). The Sustainability Appraisal highlighted potential negative effects on flood risk, so the plan contains a bespoke strategy agreed with the Environment Agency and this is referred to in this report under Issue 6. Section 7 of the plan contains strong policies to encourage the use of sustainable transport which would assist in protecting quality of life, air quality and the character of the streets in the historic centre. And, as discussed under Issue 2, the capacity of the city to accommodate new housing has been appropriately evaluated. Growth can be accommodated without notable impact on the historic centre or the green setting of the city. As regards Green Belt, the matter of exceptional circumstances for the release of land from the Green Belt is discussed below under Issue 5.*
- 36. As regards environmental considerations in the wider Oxfordshire area, these are a matter for the local authorities themselves, but it is notable that the local plans referred to above, two of which are already adopted and two are at examination, have already addressed the growth needs for the majority of the plan period. They have rigorously evaluated the balance between growth and environmental considerations, and have been subject to sustainability appraisal.*

4. How have the opinions of statutory consultees been taken into account?

4.1 As was discussed in Section 2, successive rounds of SA Report were prepared and made available to statutory consultees, neighbouring local authorities and the public as the Local Plan evolved. All the documents were put on the City Council's website. Overall few responses to these reports were received. The responses, and changes made to the SA and Local Plan in response are discussed below.

SA Scoping Report Local Plan 2036

4.2 Consultation on the SA Scoping Report was kept to those consultees designated by the legislation as "authorities with environmental responsibilities". The Government has designated the Environment Agency, Natural England and Historic England as agencies that must be consulted by plan-making authorities on the content of the SA Scoping Report and SEA Requirements. These organisations were consulted for 5 weeks as specified in the legislation.

4.3 Appendix 1 of Sustainability Appraisal and Strategic Environmental Assessment (CSD.5) sets out all the comments received from the three statutory agencies. Of particular note were the following comments from Historic England, Natural England and the Environment Agency (Table 4.1).

Table 4.1: Selection of comments from consultation bodies on the SA Scoping Report

Consultee	Comments	Action Taken
Historic England	Concerned at the conflation of design and the historic environment (p.7)	These remain in the same chapter (5 Built Environment, Heritage and Creating Quality New Development) but the chapter is divided in to 2 distinct sections.
Historic England	Expect the evidence base to reference to the Historic Environment Record, the Oxford Heritage Assets Register and accompanying character statements, the Oxford Heritage Plan, the Archaeological Action Plan and conservation area character appraisals (p.8)	The preferred options document now contains a reference to these documents. The SA Scoping Report was updated to inform the proposed submission stage.
Historic England	There is no mention of archaeology in the relevant SEA theme (p.9)	Preferred Options Document Chapter 5 contains a subsection on archaeology which contains a set of policies on archaeological remains
Historic England	Suggest "the number and proportion of heritage assets at risk" to accompany the proposed indicator for heritage assets at risk and the following additional indicators: • the number of major development projects that enhance the significance of heritage assets	We gave consideration to and included as appropriate these and/or other suitable indicators to monitor the historic environment.

	<p>or historic landscape character;</p> <ul style="list-style-type: none"> • the number of major development projects that detract from the significance of heritage assets; and • the percentage of planning applications where archaeological mitigation strategies were developed and implemented; and • % of Conservation Areas in Oxford with an up-to-date character appraisal (and management plan). (p.10) 	
Environment Agency	Pleased to see that a new SFRA will be undertaken to support the new local plan. The updated SFRA would need to be part of the evidence base and subsequently, the local strategic flood risk policy and proposed site allocations should reflect the findings and recommendations of the SFRA. (p.2)	Site Assessments analysed the overall flood zone and worst flood zone of every site using data from the new SFRA. The suite of policies on flood risk and drainage were informed by the new SFRA.
Environment Agency	SFRA would need to include updated climate change allowances (p.2)	SFRA updated to include new flood maps for proposed submission stage.
Environment Agency	OCC should demonstrate through a sequential test that a range of options in the site allocation process has been considered and that development will be located to areas at lowest risk of flooding. In the first instance, sites should be located in flood zone 1 (FZ1). However, even in FZ1 other issues such as surface water flooding may need to be taken in to consideration. (p.2)	Sequential test undertaken.
Environment Agency	NPPG states that where land outside flood risk areas cannot appropriately accommodate all the necessary development, OCC should increase the scope of the assessment to a level 2 SFRA to consider the application of the exception test ensuring that potential sites in areas at high risk of flooding are deliverable. (p.2)	Level 2 SFRA was undertaken to support proposed submission.
Environment Agency	Plan should recognise that where there are new developments adjacent to the city's watercourses, opportunities should be sought to maintain and enhance the river corridors and to contribute to the city's green infrastructure network. (p.5)	Preferred Options document included options on blue and green infrastructure
Environment Agency	Plan should ensure that developing land affected by contamination will not create unacceptable risks to human health and the wider environment, including groundwater (p.5)	Preferred Options document included preferred option relating to contaminated land.
Environment Agency	Local plan and policies should aim at protecting and improving the natural environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable	Preferred Options document included preferred option relating to contaminated land.

	land. (p.5)	
Natural England	The Local Plan will need to be based on an up-to-date environmental evidence base including an assessment of existing and potential components of ecological networks to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environmental value is chosen for development, and to ensure the mitigation hierarchy is followed. This should include consideration of European designated sites, Sites of Special Scientific Interest (SSSIs), Local Wildlife Sites (LWSs), Sites of Local Importance for Nature Conservation (SLINCs), Wildlife Corridors, Conservation Target Areas (CTAs), protected species, and habitats and species of principal importance as listed under Section 41 of the Natural Environment and Rural Communities Act 2006. (p.1)	Surveys undertaken for local sites informed the Local Plan 2036.
Natural England	In relation to SAC, this will need to include screening under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites (p.2)	Screening was produced (see Sec. 7)
Natural England	The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable (p.2)	Suggestions made where appropriate.
Natural England	One of the main issues which should be considered in the SA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment (p.3)	Options assessments all considered air quality.

Draft SA Report – Preferred Options June 2017

- 4.4 Responses were received from four stakeholders in relation to the Sustainability Appraisal of the Preferred Options document (June 2017). These comments are documented in Appendix 1A of the Sustainability Appraisal and Strategic Environmental Assessment (CSD.5) and shown at Table 4.2.

Table 4.2 Comments received on the Preferred Options Sustainability Appraisal

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

4.5 There were five responses made by six respondents to the Sustainability Appraisal and Strategic Environmental Assessment Report (September 2018). The six respondents were: the Highways Agency (35), De Merke Estates and M.K. Dogar (Neame Sutton Ltd.) (193), Oxfordshire County Council (250), Oxford Climate Lobby (49) Oxford Friends of the Earth (174) and one individual.

4.6 Table 4.3 table shows the responses that were made on to the Sustainability Appraisal and Strategic Environmental Assessment Report (September 2018).

4.7 The table below sets out summaries of the responses to the Sustainability Appraisal following the Regulation 19 consultation. The responses and the officer comments were sent onto the Inspectors for the Local Plan hearings.

Table 4.3 Comments Received on the Sustainability Appraisal and Strategic Environmental Assessment Report (September 2018)

Respondent	Summary of Response	Officer comments sent to the Inspectors
Highways England	Concerned that despite a general neither positive nor negative impact when considering the total plan impacts, the sustainability appraisal states: “the general increase in housing across the city as a result of the plan could lead to negative impacts on air quality and traffic levels in some areas” These areas do not appear to have been identified within the evidence base and therefore they request confirmation as to which (if any) Highways England’s assets are expected to be impacted by the delivery of the plan in order for the plan to be considered effective and justified.	The SA provides a high-level precautionary summary of the impacts of the Plan. The impacts referred to in this statement are that there could be some pockets of increased traffic levels within the city, however historic trends indicate that there has been a decrease in car-use within Oxford between 2001-2011 Census of population. The ‘in-combination mitigation set out as in the HRA, which provides details of the Oxford Transport Strategy indicates no impact/ a less than significant impact on the SRN.
Oxford Climate Lobby and Oxford Friends of the Earth	The Plan and Sustainability Appraisal fails tests of soundness. The purpose of the SA is stated as ensuring that all aspects of sustainability are properly considered. The IPCC Global Warming Report changes what can be considered ‘sustainable development’. The SA objective seeks only ‘to achieve significant progress towards its net zero greenhouse gas emissions’, considered not fit for purpose. Should be a commitment to reducing emissions to below 55% of 2020 levels before 2030 as a first step to becoming carbon neutral by 2050. Quantifiable and staged targets are required together with monitoring.	The SA is a decision-making tool and forms part of the evidence base to the Local Plan. The purpose of the SA is to demonstrate how the plan has addressed relevant economic, social and environmental objectives (NPPF para.32). ‘Sustainable Development’ is set out in the Planning and Compulsory Purchase Act 2004 and the NPPF. The SA adheres to this legal definition of sustainable development. The SA considers the impact on climate change and all the other constituent parts of the environment as set out by SEA legislation. The SA framework, which included objectives and targets, was

Respondent	Summary of Response	Officer comments sent to the Inspectors
		the subject of appropriate early consultation. The SA objectives and targets are considered fit for purpose. The SA has been audited by one of the leading SEA experts in the country.
Oxfordshire County Council	Amend the reference to waste in Table 4.6 to read "The joint work of Oxfordshire Councils reduced the amount of household waste generated between 2007-11. These reductions in household waste are mainly to do with all residents receiving new comprehensive kerbside collection services, in addition to intensive communications and engagement initiatives outside of the scope of planning. From 2011 to 2017 there has been a gradual increase in household waste arisings. The amount of household waste recycled and composted has increased from 38.5% in 06/07 to 60% in 16/17. the amount of household waste sent to landfill has reduced from 61.4% in 06/07 to less than 5% in 16/17 as residual waste is now sent for energy recovery.	Factual Clarification
M. Franklin (individual)	The SA refers to the Paris Agreement of 2015 and its requirements to reduce greenhouse gas emissions by 40%/degrees by 2030, compared to 1990. This is now seriously out of date and totally inadequate. Recent report by Intergovernmental Panel on Climate Change shows that humanity worldwide needs to reduce GG emissions to zero by 2030 if we are to have a chance of keeping climate heating to within the critical 1.5% and avoid a global mass extinction event. The level of zero by 2030 needs to be taken now as the baseline figure not only for the SA but for all policies in the OLP2036 on housing, transport, economic growth and 'sustainable development' in general. Plan therefore needs extensive rethinking and revision to bring it into line with the necessity to reduce GG gas emissions to zero by 2030.	The SA is a decision-making tool and forms part of the evidence base to the Local Plan. The purpose of the SA is to demonstrate how the plan has addressed relevant economic, social and environmental objectives (NPPF para.32). 'Sustainable Development' is set out in the Planning and Compulsory Purchase Act 2004 and the NPPF. The SA adheres to this legal definition of sustainable development. The SA considers the impact on climate change and all the other constituent parts of the environment as set out by SEA legislation. The SA framework, which included objectives and targets, was the subject of appropriate early consultation. The SA objectives and targets are considered fit for purpose. The SA has been audited by one of the leading SEA experts in the country.
De Merke	The sustainability appraisal accompanying	All Reasonable alternatives are

Respondent	Summary of Response	Officer comments sent to the Inspectors
<p>Estates and M.K. Dogar (Neame Sutton Ltd.)</p>	<p>the plan appears limited in scope particularly in terms of the alternative options explored for the delivery of new housing. In reality there were only two broad options assessed, namely aiming to meet the OAN, identified as 1600 dpa by 2031, or setting a capacity based target, which is the preferred approach for the sustainability appraisal. It is considered that there are at least 3 other reasonable alternatives that should have been tested by the SA but weren't, including meeting the OAN as defined in the SHMA 2018 update (1400 dpa), meeting the capacity identified in the Oxford Growth deal (500 dpa) and meeting the OAN as defined by the standard method (746 dpa). As these reasonable alternatives were not given consideration the SA is therefore flawed and of limited value as evidence for the Plan.</p> <p>Furthermore the Council has only proceeded to prepare a site specific SA for those sites it wishes to pursue in the local plan as land allocations. As a consequence any site rejected from its HELAA assessment process does not benefit from a site specific SA.</p>	<p>considered to have been dealt with. The SA considers both the maximum growth option (meeting full need) and then a capacity-based option and a 'business as usual approach'. The capacity based option was calculated by way of working out how much housing the city could accommodate. It was developed by looking at all deliverable and developable sites within the plan period, and resulted in a maximum capacity figure of 431 dpa. These two options (and the business as usual option) are the reasonable alternatives when considering the SEA legislation. The fact that the SA does not assess these options does not mean the SA is either flawed or of limited value as evidence for the plan.</p> <p>The site selection process involved looking for as many suitable sites as possible in order to ensure that the capacity-based approach left no stone unturned in the search for deliverable and developable sites for housing. Sites were not taken forward where there was no prospect of those sites coming forward in the plan period, due to environmental or other policy constraints.</p> <p>The SA has been audited by one of the leading SEA experts in the country.</p>

5. The Reasons for choosing the plan as adopted, in the light of other reasonable alternatives dealt with

- 5.1 There is more than one way of meeting the needs of residents, workers and visitors of Oxford. The options (or alternatives) stage of the SA aims to ensure that the identification of options to consider, and the choice of preferred options, takes sustainability into account. The SA Requirements are to:
- Identify reasonable options
 - Assess the options' effects using the SA Framework; and
 - Explain why the preferred options were chosen.
- 5.2 This part of the SA process focusses on the reasons for choosing the plan as adopted, in light of other reasonable alternatives. Chapter 6 of the Sustainability Appraisal and Strategic Environmental Assessment (CSD.5) includes a detailed discussion relating to the assessment of plan options. A summary of the steps taken are required to be included in this document.
- 5.3 Firstly early over-arching policy options were considered. Given Oxford's pressure for development, combined with the existing physical and environmental constraints, these were limited to options relating housing-led growth, employment-led growth or a combination of the two. In Oxford there is insufficient land available to meet all development needs; the lack of affordable housing is a barrier to economic growth; and there is an undersupply of employment premises and land to meet the forecast demand in Oxford to 2036. Given these competing issues, the right overall strategy needed to be developed to ensure that the housing supply could be maximised. It is also important that economic growth is supported so that Oxford can maintain its contribution to the local, regional and national economy. Table 5.1 compares, in broad terms, an employment-focussed strategy, a housing focussed strategy and a strategy that balances the needs of both.
- 5.4 A housing-growth focused approach would mean that Oxford's housing need was addressed as far as possible in terms of the available land. It would have a positive impact on housing, and could reduce in-commuting as more new houses were provided in the city. Depending on the scale of this, there could be improvements in air-quality and congestion. Following this approach could result in the loss of employment sites. Without mitigation, employment sites which support Oxford's key strengths could be lost which could be ultimately detrimental to the economy.
- 5.5 An employment-growth focused strategic approach would mean that housing need would be less of a priority than employment growth. As such, it is likely that less housing would be delivered during the plan period. It is also likely that in-commuting would increase as opportunities for employment growth were realised (potentially at the expense of opportunities for housing growth). The concern that lack of housing is a major barrier to economic growth would not be addressed.

Table 5.1: Over-arching Options for Housing vs Employment Growth

SA Objective	Option 1: Strategy to be housing-focussed	Option 2: Address housing needs and employment growth	Option 3: Strategy to be focussed on employment growth
1. Flooding	I	I	I
2. Vibrant communities	++	+	-
3. Housing	++	-	--
4. Human Health	0	0	0
5. Poverty & Soc. Exclusion	I	I	I
6. Education	?	?	?
7. Services and Facilities	I	I	I
8. Green Spaces & Sport	I	I	I
9. Biodiversity	I	I	I
10. Urban Design & Heritage	I	I	I
11. Transport & Air	+	0	-
12. Water & Soil	I	I	I
13. Efficient use of resources	I	I	I
14. Economy & Employment	--	+	++
15. Sustainable Tourism	0	0	0

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

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

Approaches to housing and employment growth

5.8 Following the consideration of the over-arching policy options for housing and employment, a spatial element was then added to each aspect (i.e. strategic options considered for both housing and employment growth). This was in order to set out what the reasonable alternatives were for both housing and employment growth. Table 5.2 sets out what these options were.

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

Table 5.2: Strategic options for housing and employment growth

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

5.10 The highlighted parts of Table 5.2 shows the strategic options which were taken forward.

5.11 Different options were considered at different stages of the Local Plan preparation process, and were assessed and compared as part of the SA process. The Sustainability Appraisal and Strategic Environmental Assessment Report (September 2018) describes which options were subject to a full appraisal, and the reasons for choosing the 'preferred options' of the SA. This section highlights those "early" strategic options for a broad range of policy areas which were considered to be fundamental for the fine-tuning of the strategy. While the SA itself covers all options, only those with a broad early strategic nature are considered here.

5.12 Table 5.3 shows, for each "early strategic" topic, the options considered in the SA and notes the options that were finally chosen for the Local Plan 2036. In the final column it summarises the SA's comparison of options.

Table 5.3 Options considered in the SA and information about the choice of preferred option

Local Plan 2036 Topic	Summary of Options	Summary of findings from the options comparison in the SA Report
Protecting Category 1 employment sites (important nationally and regionally, to knowledge economy eg Oxford Science Park, Oxford Business Park, medical research sites)	<p>Option 1 (preferred option): Protect all category 1 sites for employment uses only, allowing modernisation and intensification</p> <p>Option 2: Allow residential uses to be introduced on category 1 sites, as long as no net loss of employment floorspace</p> <p>Option 3: Allow a range</p>	It is widely recognised that the shortage of housing in Oxford is a barrier to economic growth. The Oxford Employment Land Assessment (2016) identifies the need to provide for additional employment development to meet the forecast demand to 2036. Coupled with the huge housing need, this presents a challenge for this Local Plan. Oxford needs to find an approach so that the barriers to economic growth (e.g. shortage of housing) and the drivers of economic growth (e.g. employment growth) can both be addressed appropriately and without detriment to one another. Protecting all category sites for

like Old Road Campus)	<p>of other uses to be introduced on category 1 sites, as long as no net loss of employment</p> <p>Option 4: Do not protect category 1 sites for employment uses</p> <p>Option 5: Set out site-specific requirements e.g. uses, types of employment, infrastructure requirements, parking, access, onsite facilities)</p>	<p>employment uses only (Option 1) would provide the strongest policy protection for the highest tier of employment sites. It would ensure that important sites underpinning the knowledge economy and significant employers in Oxford are not lost. It also helps to reduce commuting to work, as well as improving access to local jobs for different sectors of the community. Protecting these sites helps to encourage opportunities for a diverse range of different businesses and employment, but consideration should be given to opportunities to allow some to be developed for housing where strict criteria are met. As employment growth is allowed to continue through modernisation and intensification of sites, other land in the city can be used to address barriers to economic growth (e.g. lack of housing).</p>
<p>Protecting employment sites: Category 2 sites (important nationally and regionally, not directly part of the knowledge economy but significant employers or sectors in Oxford, primarily B1 and B2 uses, e.g. BMW-Mini, Unipart)</p>	<p>Option 1 (preferred option): Protect category 2 sites for employment uses only (including modernisation)</p> <p>Option 2: Protect employment on category 2 sites, but permit residential uses as long as there is no net loss of employment</p> <p>Option 3: Protect employment on category 2 sites, but permit other uses as long as there is no net loss of employment</p> <p>Option 4: Do not protect category 2 sites for employment uses</p>	<p>Retaining the Category 2 employment sites for employment-generating uses serves to reduce commuting to work, as well as improving access to local jobs for different sectors of the community. It is important to protect these sites to encourage opportunities for a diverse range of different businesses and employment but consideration should be given to opportunities to allow some to be developed for housing where strict criteria are met. Option 1 is the preferred option for the same reasons as for the Category 1 sites.</p>
<p>Overall housing for the plan period</p>	<p>Option 1: Aim to meet Objectively Assessed Housing Need (OAHN) for Oxford within Oxford (1600 dwellings per annum (dpa), 32,000 total by 2031) by significantly boosting housing supply and prioritising housing over other policy aims.</p> <p>Option 2 (preferred option): Set a target based on capacity, aimed at meeting as much of the OAHN as possible by boosting housing supply</p>	<p>The 2018 HELAA indicated a capacity of 8,620 homes although the final capacity of the city was found to be higher (10,884 homes) as a result of further testing and analysis. This option also takes into account the on-going work with adjoining authorities within the strategic housing market area, to positively address needs that cannot be met in Oxford. At the time of the options analysis, this was based on a working assumption that around 15,000 homes need to be met outside of Oxford by 2031, agreed by Oxfordshire Growth Board (September 2016). Further work has subsequently been undertaken to understand what this need would look like through to 2036. The more detailed assessment of sites and capacity through the local plan process has helped</p>

	<p>with appropriate consideration of other policy aims. Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford.</p> <p>Option 3: Continue current level of provision (400dpa, 8,000 total). Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford (Business as Usual, current Local Plan 2001-16 policy, and average provision).</p>	<p>to refine what the true unmet need figure is that needs to be met outside of Oxford.</p> <p>It was proposed to continue with a capacity-based approach to planning for homes in Oxford. This sets a requirement which should be seen as a minimum to plan for; it can be exceeded in the event that windfall opportunities arise to deliver additional homes in Oxford, for example if a major landowner changes their intentions for a site. With this preferred approach, there is always going to be a proportion of housing needs that cannot be met within Oxford. The City Council has worked in partnership with the other Oxfordshire authorities through the Oxfordshire Growth Board to address its unmet housing needs.</p>
<p>Level of affordable housing requirement and priority types of affordable housing</p>	<p>Option 1 (preferred option): Continue with current approach to prioritise delivery of affordable housing, requiring a proportion of affordable housing to be as high as viability will allow. Continue with current approach to significantly prioritise social rent over intermediate housing ("business as usual" is currently 50% affordable housing requirements and an 80/20 split in favour of social rented over intermediate housing).</p> <p>Option 2: Reduce the overall proportion of affordable housing required from 50%, which could include differential rates depending on the size of the development.</p> <p>Option 3: Provide a greater focus than previously on</p>	<p>These options consider two aspects of affordable housing provision: how much affordable housing the plan is seeking to deliver as a proportion of total homes secured from developer contributions; and which type of affordable housing is the priority i.e. whose housing needs are the focus of the policy.</p> <p>Given the assessed need for affordable housing, the City Council will continue to seek to maximise delivery of affordable homes. Viability testing will be required to help define and support the level of affordable housing sought through the policies.</p> <p>The preferred policy response seeks to continue to prioritise the housing needs of those who are least able to access homes on the open market and whose only option is social rent. However the current policy balance of affordable housing (80% social rent to 20% intermediate housing) may not be the appropriate balance to continue because of clear needs from key workers and other sectors, and also wider changes in national policy beyond our control which will affect the successful delivery (and retention) of homes for social rent by the council or registered providers.</p> <p>The need for affordable housing is so great that delivering affordable housing from developer contributions will not be sufficient alone. Other</p>

	<p>intermediate housing by adjusting the existing 80/20 split. Intermediate housing might include shared ownership, starter homes or affordable homes to buy or rent for key workers.</p> <p>Option 4: Consider a reduced affordable housing percentage if the affordable dwellings were of a size in greatest need in Oxford (i.e. 2+ bedrooms or 3/4 + bedspaces).</p>	<p>council-led initiatives will also be required (such as the Housing Company). There will also be a role for key employers to play in addressing needs for their staff, for example by delivering affordable staff housing on development sites.</p>
Making use of previously developed land	<p>Option 1: Focus all new development on previously developed land</p> <p>Option 2: Do not prevent new development on greenfield land</p> <p>Option 3 (preferred option): Restrict development to previously developed land and greenfield land that has been identified as suitable for allocation.</p>	<p>Because of the shortage of developable land in Oxford, it is important that options consider the best way to use that land.</p> <p>Restricting development to previously developed and suitable greenfield sites (Option 3) would deliver more residential and key essential services sites than the other policy options. It would support resisting a piecemeal and <i>ad hoc</i> approach to development. Depending on its implementation this approach may have a number of positive effects, including social and environmental (e.g. it should be easier for larger sites to deliver net biodiversity gain). It also encourages the redevelopment of underused and vacant sites.</p>
Density and efficient use of land	<p>Option 1 (preferred option): Require that development proposals make the best use of site capacity, bearing in mind that larger-scale proposals will often be suitable</p> <p>Option 2: Have minimum housing density requirements in allocations</p> <p>Option 3: Do not include a policy on density and efficient use of land but rely on national planning policy</p>	<p>Requiring development proposals to make the best use of site capacity (Option 1) would enable applications to be refused if they do not make efficient use of land. However, it also acknowledges that proposals should make an individual design response to site-specific circumstances and surroundings, and that capacity will be guided by the appropriate use for the site. Generally a greater intensity of development will be expected on sites with good local facilities and public transport accessibility.</p>
Green Belt	<p>Option 1 (preferred option): Review the Green Belt boundaries</p>	<p>Greenfield sites deliver many functions and benefits and are highly valuable, so will generally be protected. However, policy approaches should</p>

	<p>and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study. Do not review the Green Belt boundary or allocate sites where the impact would be 'high'.</p> <p>Option 2: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'low' impact on the Green Belt, as determined by the Green Belt Study.</p> <p>Option 3: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'high', 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study.</p> <p>Option 4: Do not allocate Green Belt sites for housing.</p>	<p>consider how to identify the greenfield sites with less value that could be suitable for development. This will include Green Belt sites. Sites in the Green Belt have been identified that are of low recreational, biodiversity and flood storage value and which have landowner interest in developing the site. An Oxford Green Belt Study has been 63 prepared by Land Use Consultants, which assesses the impact that development on these identified Green Belt sites would have on the integrity of the remaining Green Belt.</p> <p>Reviewing the Green Belt and supporting housing that has a low or moderate impact (Option 1) would mean allocating 8 sites of about 18 hectares in total where development would have a moderate impact on the integrity of the Green Belt. To put this in context, there is of a total of 1,287 hectares of Green Belt within the city, and the city is 4,560 hectares in total. This option strikes a balance between protecting the integrity of the Green Belt and ensuring that sites come forward to meet development needs in sustainable locations. As well as the Green Belt assessment, all sites would be appraised to ensure they are good locations for development, although generally any site in Oxford is likely to be sustainable. This approach would require Green Belt boundaries to be reviewed and amended. Site allocations policies should also mention any other potentially mitigating measures that could minimise any harmful impact on the Green Belt.</p>
Flood Risk Zones	<p>Option 1 (preferred option): Include a policy in line with the NPPF that allows only water-compatible uses in flood zone 3b, and application of the sequential test for other developments. Include a policy on reducing or not increasing run-off.</p> <p>Option 2 (preferred</p>	<p>Allowing only water-compatible uses and essential infrastructure in the functional floodplain (Option 1) would not increase the risk of flooding elsewhere or result in net loss of floodplain storage. Using the sequential test for other sites would ensure that development is directed towards land in flood zone 1 where possible. It would also enable development to come forward on flood zone 3a sites where the sequential test has been passed because of the huge need for development in Oxford and the lack of availability of sites in other locations.</p>

	<p>option): Allow development on brownfield sites in flood zone 3b, with very high standards of flood mitigation measures and reduced run-off required.</p> <p>Option 3: Prevent development in any greenfield site with a 1/100 risk of flooding or greater (with specified exceptions, e.g. car parks, or exceptions for allocated sites)</p> <p>Option 4: Do not include a policy but rely on guidance in the NPPF and PPG.</p>	<p>Allowing some development on brownfield land in the functional floodplain (Option 2) would have a neutral or positive effect on water retention and storage. Existing developments may contribute to surface-level run-off. Some brownfield sites, particularly areas of hardstanding, can have a function in flood storage and decreasing flood flow to other areas. Therefore, in most cases the overall footprint of development should not be substantially increased. It will be vital that it is clearly demonstrated that new development would not impede the flow of water, reduce the capacity of the floodplain to store water, create or increase any risk for occupants, or increase the risk of flooding elsewhere. This option encourages efficient use of land and may also allow development close to where people live, helping to sustain vibrant communities. It could enable the delivery of more housing, education or health facilities on sites that are already well served by essential services and facilities. Greater use of brownfield sites for new development is likely to reduce the need to use greenfield sites and this should help to maintain and where possible improve water quality. The preferred option is a combination of Options 1 and 2.</p>
Air Quality Assessments	<p>Option 1 (preferred option): Require air quality assessments for all major developments or any other development considered to have a significant impact on air quality and the identification of measures to mitigate any impacts</p>	<p>The Planning Practice Guidance sets out the information that may be required in an air quality assessment, making clear that “<i>Assessments should be proportional to the nature and scale of development proposed and the level of concern about air quality</i>”. Many Air Quality Assessments currently tend to neglect the contributions of the emissions from energy centres/ combustion systems, and focus on emissions resultant from traffic. The introduction of this policy re-enforces the importance of assessing the emissions of this significant source of air pollution. According to the Air Quality Action Plan for Oxford, commercial, institutional and residential combustion processes are responsible for 17% of the total NO_x emissions of the city.</p>
Biodiversity sites, wildlife corridors. Species protection independent ecological assessment (accounting)	<p>Option 1 (preferred option): Protect a hierarchy of international, national and locally designated sites of importance for biodiversity, including connecting wildlife corridors.</p> <p>Option 2 (preferred</p>	<p>Sites with international importance (such as the Port Meadow SAC) and national importance (such as sites of special scientific interest, SSSIs) must be protected. However there are also local sites with biodiversity interest (such as Local Wildlife Sites and other sites designated for their local biodiversity interest) that can provide important social and environmental benefits. Protecting these sites (Option 1) can also have important network functions in terms of providing</p>

	<p>option): Protect other sites with biodiversity interest. The use of a biodiversity calculator will be required to demonstrate net gain for biodiversity. The principle of the 'avoid, mitigate, compensate' hierarchy will be expected, and where damage is unavoidable, offsetting may be considered as long as overall net gain is demonstrated.</p> <p>Option 3: Protect biodiversity sites of national and regional importance only</p>	<p>connections between larger areas of habitat, supporting biodiversity across the city and should be protected.</p> <p>Protecting other sites with biodiversity interest, for instance where there are records of protected species (Option 2) would give further protection to biodiversity interest.</p> <p>Protecting biodiversity sites of national and regional importance only (Option 3) offers no protection for sites of local biodiversity interest, and there is a risk that these sites could be lost. The preferred option is a combination of Options 1 and 2.</p>
Building Heights	<p>Option 1: Identify locations suitable for higher buildings</p> <p>Option 2: Require buildings over a certain height in identified areas</p> <p>Option 3: Remove all height restrictions in policy</p> <p>Option 4: Loosen height restrictions in view cones and central area but introduce policy requiring assessment of impacts of heights in those areas</p> <p>Option 5: Require buildings of a minimum height in all areas</p>	<p>As a result of the appraisal process, options 1, 2 and a variation of option 4 were combined. Added to this combined preferred option was a requirement for exceptional design. This was the preferred option.</p>
High buildings, view cones and high building area	<p>Option 1: Continue with the current policies that limit the height of buildings in the view cones area and central 'high buildings area'.</p> <p>Option 2 (preferred option): Continue to define view cones and a high buildings area but instead of a height limit introduce criteria for assessing the impact of proposals on the skyline (based on the View Cones</p>	<p>Introducing criteria for assessing the impact of proposals on the skyline (Option 2) should ensure that, instead of a blanket approach, full consideration is given to how new development will impact on the skyline. This would allow new taller buildings that make a positive impact on the skyline. It will ensure that efficient use of land is encouraged, but not to the detriment of the unique character of Oxford's urban environment and in particular views of the 'dreaming spires'. A policy requirement for a Visual Impact Assessment, especially for larger developments would help to ensure that effects are understood. The policy will need to refer to issues such as roofplant (e.g. air-conditioning units) and massing.</p>

	Study) Option 3: Do not have a specific policy to protect views of the skyline Option 4: Review view cones and remove those where views have been lost because of trees etc.	This is the preferred option
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5.13 It is worth noting that in virtually all cases the preferred option was taken forward to form the basis of the policy.

Site Allocations

5.14 The site allocations development process integrated the Sustainability Appraisal and plan-making processes. The type of sites that were taken forward in the locations that they were allocated in took account of the Local Plan strategy's spatial approaches. The sites themselves came from a range of different sources including:

- Oxford Core Strategy, Sites and Housing Plan allocated sites;
- West End AAP identified sites;
- Other sites from the previous 2014 Strategic Housing Land Availability Assessment;
- Calls for Sites inviting landowners to nominate their sites (2014, 2016, 2017, Local Plan)
- Protected Key Employment Sites
- Other employment sites not protected (if greater than 0.25ha)
- Wildlife corridors and Sites of Local Importance for Nature Conservation designations;
- Protected Open Space designations (public open space, open air sports, allotments)
- Sites previously rejected through the Sites and Housing Plan process
- Stakeholder consultation (Unlocking Oxford's Development Potential [Cundall Report])
- City Council department suggestions (e.g., Property, Leisure)
- Commitments (sites with planning permission or expired but suitable for housing/ student accommodation)
- Sites refused planning permission or expired but suitable for housing/ student accommodation in principle
- Map survey (any other piece of land greater than 0.25ha)

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

- **Stage 1.** All sites underwent a Stage 1 filter process. Sites were rejected for allocation for development if they were:
 - a Special Area of Conservation (SAC) or Site of Special Scientific Interest;

- greenfield in flood zone 3b;
 - less than 0.25 hectares in area;
 - already at an advanced stage in the planning process (i.e. development has commenced).
- **Stage 2.** All sites that had passed the Stage 1 filter process were considered against the SA objectives. The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure. Sites were rejected at this stage if they:
 - were considered to be part of Oxford's Green Infrastructure network as determined in the Green Infrastructure Study;
 - had no clear access.
 - **Stage 3.** All sites that had passed the Stage 2 assessment were considered in terms of deliverability and against the Local Plan Preferred Options strategy. Sites were rejected at this stage if:
 - it is extremely unlikely to become available during the plan period (i.e. before 2036);
 - the landowner has indicated that they have no intention to develop;
 - there is serious conflict with the NPPF/Oxford Local Plan Preferred Options strategy and no mitigation is possible.
- 5.16 Of 516 initial sites, 390 were rejected at stages 1, 2 or 3, leaving 126 sites that were carried forward to the preferred options stage. The detailed site assessments can be found in *Sites Background Paper* (BGP.20). Table 2.3 above sets out the SA Appraisal Framework for the Site Allocations. Table 6.15 of the Sustainability Appraisal and SEA Report (CSD.5) summarises the appraisal findings for the Preferred Sites.

6. Measures to be taken to monitor the significant sustainability effects of the implementation of the Oxford Local Plan 2036

- 6.1 The Environmental Assessment of Plans and Programmes Regulations require local authorities to “monitor the significant environmental effects of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”
- 6.2 Table 6.1 shows the monitoring framework that will be used to monitor the significant environmental effects of the Oxford Local Plan.

Topic (By SA objective)	Indicator	Target	Who monitors?
1. Flooding	Net Increase/ Reduction of built footprint in high risk flood areas	No net increase in built footprint of previously developed land in Flood Zone 3b	Development Management (DM) Monitoring Environment Agency
	Net increase/ reduction in flood storage	All relevant planning applications to be accompanied by a site specific flood risk assessment	
	Approved applications that are subject to an unresolved objection	No approvals subject to objection from the Environment Agency	
2. Vibrant Communities	Total number of residents	n/a	Contextual data on which SA predictions are based
	Total number of students	n/a	
		Built area densities of approved schemes	To achieve the minimum densities set out in Policy RE2
3. Housing	Number of new homes delivered (completed) in the Plan period.	A minimum of 10,884 new homes over the plan period. Dwellings delivered per annum in the plan period as follows: 2016/17 to 2020/21: 475 dpa 2021/22 to 2035/36: 567 dpa	DM Monitoring Housing Services Commercial data, e.g., Home Builders Federation
	a) Net reduction/increase in admin floorspace over plan period.	a) Net increase in university academic/admin/research floorspace	Oxford City Council, Oxford Brookes University and University of Oxford
	b) Rate of reduction in number of full time students living in non-university provided accommodation within Oxford.	b) Threshold for Oxford University by 01/04/22: 1500 Threshold for Oxford Brookes University at 01/04/22: 4000	
4. Human	a) Percentage of affordable and market	a) Compliance: Affordable dwellings -	DM Monitoring

Topic (By SA objective)	Indicator	Target	Who monitors?
Health	dwelling in approved developments constructed to M4 (2) standard.	100%; Market dwellings - 15%	
	b) Percentage of dwellings in approved developments comprising of 4+ units constructed to M4(3) standards.	b) Compliance: 5% of all dwellings on sites of 20 or more dwellings that include on site affordable housing where City council is responsible for nominations	
	Health Impact Assessments	No set targets but showing outcomes delivered through development	DM Monitoring CIL/ S106 Monitoring
5. Poverty, Social Exclusion and Inequality	Index of Multiple Deprivation	Reduce	
	Percentage of onsite affordable homes provided in larger developments (10 or more homes)	On qualifying development sites (10+ homes or exceeding 0.25ha): 50% affordable provision, of which 40% is social rented	DM Monitoring Housing Services
6. Education	Education dimension of IMD		
7. Essential services	Net loss/ gain of cultural and community facilities including: <ul style="list-style-type: none"> - Education/ training facilities - Community meeting places - Indoor sports facilities - Primary care facilities 	No net loss of cultural and community facilities without equivalent re-provision Net increase in community facilities	DM Monitoring S106 Monitoring
	Development of cultural, entertainment, leisure and tourism uses	Not set targets but showing outcomes delivered through development	DM Monitoring CIL Monitoring
	Approvals for changes of use of public houses or live performance venues	No net loss of assets of community value without equivalent re-provision	
	Development of appropriate main town centre uses within city centre and district/ local centres	No set targets but outcomes delivered through development	DM Monitoring
8. Green Spaces	Type and scale of development within Green	No inappropriate development, as set out	DM Monitoring

Topic (By SA objective)	Indicator	Target	Who monitors?
	Belt land	in the NPPF, in Green Belt land No reduction in site area beyond amended boundaries	Natural England data
	Effect on existing Green and Blue Infrastructure	No net loss/ degradation of existing Green and Blue infrastructure	
9. Biodiversity	Number of approvals that impact special sites	No net reduction in areas of special sites.	DM Monitoring
	Net reduction in special sites footprint from baseline		Natural England data
	Condition of Port Meadow SSSI; integrity of Oxford Meadows SAC	No likely significant effects through increase in NOx (see 11 below)	Natural England
10. Urban Design and Heritage	Number of heritage assets on Historic England 'at risk' register	No increase in number of heritage assets 'at risk'	DM monitoring
	Number of listed buildings lost/ demolished	No permissions granted for development resulting in substantial harm or loss to nationally listed heritage assets	Historic England
	Continued development of Heritage Plan for Oxford	Review and Revision as set out in the Plan	Oxford City Council Heritage Team
11. Transport and Air	Percentage of people travelling to work by private motor vehicle	No increase in current level (43.3%)	Census, every 10 years County Council
	NOx levels in Oxford, particularly at Binsey, and at Oxford Meadows SAC near A34	Progressive decrease in NOx, NO and ozone levels (30µg/m ³ NOx (threshold level for vegetation) triggers action)	Oxford City Council and others. Required sporadically.
	Number of Electric Charging Points (ECP) delivered through new development	Minimum 10% provision for ECP in approved non-allocated parking	DM Monitoring County Council – Highways
12. Water and Soil	Proportion of river length assessed as fairly good or good for chemical and biological quality	Achievement of 'good' status by 2027 at the latest	Environment Agency (through RBMP) every 6 years
	Incorporation of SuDS as part of	All development must demonstrate regard	Oxford City Council

Topic (By SA objective)	Indicator	Target	Who monitors?
	development proposals	has been had to SuDS design and evaluation guide TAN	
	Water Efficiency methods to be demonstrated	100% compliance for all new residential development with Part G2 of water consumption target (110 litres per person per day) of 2013 Building Regulations (or future equivalent legislation).	DM Monitoring Building Regulations Compliance
13. Climate Change and energy	Carbon reduction strategy required in new developments	40% reduction in carbon emissions compared to a code compliant base case 2013 Building Regulations (or future equivalent legislation). Requirement will increase to zero emissions over plan period (50% reduction by 2026, 100% by 2030).	DM Monitoring Applicant Submitted Information
14. Economy and Employment	% economically active	Increasing	NOMIS, quarterly
	Amount of employment land available, by type and location	Ensure supply throughout plan period	Oxford City Council
15. Sustainable Tourism	Development of new or approved changes of use for short stay accommodation premises in the city centre, district centres and allocated sites	No net increase in short stay accommodation premises above baseline—see AMR indicator.	DM Monitoring CIL Monitoring
	Development of new tourist attractions	Net increase in longer stay accommodation	

7. Habitat Regulations Assessment

- 7.1 Habitats Regulations Assessment involves up to four consecutive stages, with the conclusions of each stage determining whether the next stage is required:
1. Screening: Determining whether the plan - 'in combination' with other plans and projects - is likely to have an adverse effect on a European site
 2. Appropriate assessment: Determining whether, in view of the site's conservation objectives, the plan - 'in combination' with other plans and projects - would have an adverse effect (or risk of this) on the integrity of the site (s). If it doesn't, the plan can proceed
 3. Assessment of alternative solutions: Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site(s), there should be an examination of alternatives.
 4. Assessment where no alternative solutions remain and where adverse impacts remain
- 7.2 The HRA for the Oxford Local Plan 2036 was carried out in house with support by Levett-Therivel sustainability consultants in consultation with Natural England. The HRA Screening conducted to support the preferred options consultation ruled out most of the impacts of the Oxford Local Plan 2036 from the need for further analysis. However the HRA Screening was unable to rule out the Oxford Local Plan from potential significant 'in combination' impacts on the Oxford Meadows Special Area of Conservation (SAC) with regards to air pollution, water quality, the hydrological regime and recreational pressure. This meant that an appropriate assessment stage was required.
- 7.3 The appropriate assessment stage of the HRA looked further at the four outstanding issues. It concluded that water quality impacts on the SAC would not be significant, in part because effluent from Oxford's wastewater treatment work discharges downstream of the SAC, and in part because other measures can control these impacts.
- 7.4 In terms of the balanced hydrological regime needed at the Oxford Meadows to maintain the conditions necessary for the continued growth of the protected plants species, proposed development in the city centre is unlikely to impact the Oxford Meadows given the direction of flow of groundwater is in the opposite direction. As an additional precautionary measure Policy RE4 of the Oxford Local Plan contains some text to help ensure surface and groundwater flow and groundwater recharge:

Development on the North Oxford gravel terrace that could influence groundwater flow to the Oxford Meadows Special Area of Conservation (SAC) will only be permitted if it includes SuDS and if a hydrological survey can demonstrate that there will be no significant adverse impact on the integrity of the SAC.

- 7.5 An in-combination assessment was carried out in relation to the Northern Gateway Area Action Plan and the Environment Agency's Flood Alleviation Scheme for Oxford (OFAS). Following assessment of these additional projects alongside Oxford's Local Plan it was concluded that there will not be an impact on the hydrology of the Oxford Meadows SAC as a result of the policies in the Oxford Local Plan.

- 7.6 Recreational Impacts were also assessed as part of the HRA and limited number of sites allocation policies were flagged as having a potential impact on the Oxford Meadows SAC.
- 7.7 Following further assessment as part of the HRA a visitor assessment was conducted for six days in October 2017 using a methodology which had been previously agreed with Natural England. The survey replicated a survey carried out in 2011 and had broadly similar findings. The survey suggested that as a result of development within the Oxford Local Plan (and Northern Gateway Area Action Plan) would see a rise in usage of a maximum of 4.5% of visitors.
- 7.8 It is, however, not visitor numbers that are the potential problem, but the impact of dog fouling on the *Apium repens* which is a qualifying feature of the Oxford Meadows SAC. A report of 2007 estimated that dog ownership in Oxford was a maximum of 24%. The survey results showed that 47% of groups visiting the SAC came with a dog, and 40% of respondents came with the main purpose of dog walking. Clearly, dog walkers are more likely to visit the SAC, and probably more likely to visit on a daily basis, than other visitors. This would rebalance the numbers above in the opposite direction.
- 7.9 A small number of site allocations included policy wording to mitigate potential impacts from dog-walkers. Given this mitigation, coupled with the fact that there is no indication that current visitor numbers have a detrimental effect on the condition of *Apium repens* at Oxford Meadows SAC. In fact the JNCC listing for the SAC¹ shows the *Apium repens* to have excellent population, conservation status, and global grade. As such, recreational (dog fouling) impacts on the SAC will be minimal, and will not affect the integrity of the SAC.

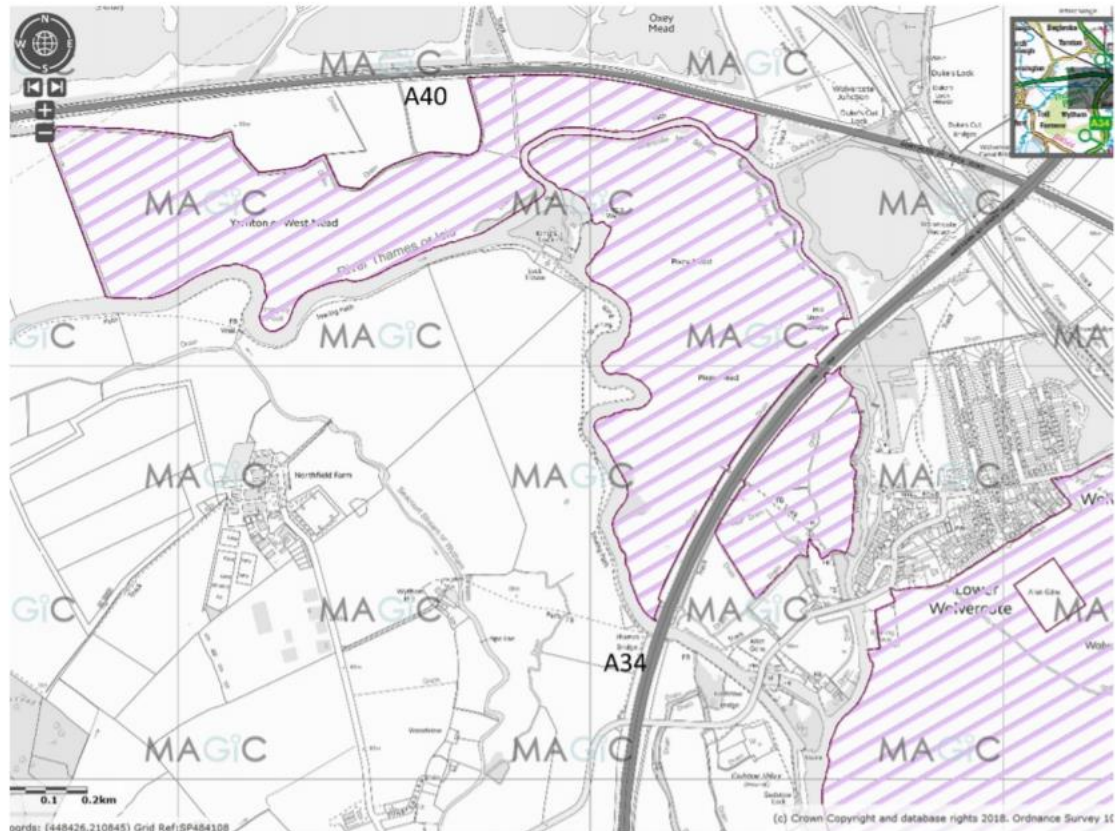
Air Quality

- 7.10 The Oxford Meadows SAC is susceptible to poor air quality, notably NO_x from the A34 and A40. Air pollution from vehicles drops off rapidly with distance from a road, and Natural England guidance suggests that it does not need to be assessed beyond 200m from the road. A small portion of the A34 between Botley Interchange and Peartree Interchange bisects the Oxford Meadows SAC, and a small portion of the A40 between Oxford and Eynsham acts as the northern boundary to the hay meadows – see Figure 7.1.
- 7.11 Those parts of the SAC that are further than 200m from the roads, including all of the southern part of the SAC, are not at risk. 5.2. The Air Pollution Information Service (APIS) provides a searchable database and information on pollutants and their impacts on habitats and species. This database recognises that the Oxford Meadows SAC is sensitive to Nitrogen Deposition (N dep). APIS provides information relating to what is known as Critical Loads. Critical loads and levels are a tool for assessing the risk of air pollution impacts to ecosystems. The critical load for N dep at the Oxford Meadows is 20-30 kg N/ha/yr.
- 7.12 Following detailed discussions with Natural England, an agreed approach was finally reached whereby transport modelling was undertaken to look at the impacts of development proposed as part of the Oxford Local Plan on traffic levels on the A34 and A40 at the points

¹ <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012845.pdf>

where they lie adjacent to the Oxford Meadows SAC. A Statement of Common Ground (addendum) was produced which set out the results of the modelling. Natural England has screening criteria as to when further analysis is required for traffic impacts on roads adjacent to sensitive sites. The threshold for further work is triggered when a plan or programme results in an increase of more than 1,000AADT on the affected roads.

Figure 7.1: The A34 and A40 at the Oxford Meadows SAC



- 7.13 A transport technical note was produced which was appended to the Addendum to the Statement of Common Ground (COM.6A). Agreement was reached between Natural England and the City Council that the transport technical note represented a sound, evidence based methodology for assessing the likely traffic related increases associated with the Oxford Local Plan 2036.
- 7.14 Natural England and the City Council agreed that the conclusions of this technical work support the fact that the Oxford Local Plan is not likely to have a significant effect alone on air quality at the Oxford Meadows SAC as the plan does not increase vehicle movements on the A34 or A40 by more than 1,000AADT. When Oxford City's own transport modelling work is assessed alongside the previous HRA work undertaken by surrounding districts, it is clear that Oxford City's Local Plan, in-combination with the plans of surrounding authorities, is not likely to have a significant effect on the integrity of the Oxford Meadows SAC. The Parties agree that the Oxford Local Plan 2036 will not have a significant effect on air quality at the Oxford Meadows SAC (i.e. increase AADT by more than 1,000) either alone or in combination.

7.15 The Oxford Local Plan was therefore assessed not to have a likely significant effect on any of the conservation objectives for the Oxford Meadows SAC either alone or in combination with other plans or programmes.

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