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OXFORD CITY COUNCIL

Sustainability Appraisal report (Regulation 19 consultation)

Oxford Local Plan 2045

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Regulation 19 Sustainability Appraisal report

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1. Non-technical summary

1.1 Introduction and process for undertaking Sustainability Appraisal

1.1 The Oxford Local Plan 2045 will update the Oxford Local Plan 2036. It will allocate sites for housing, employment and other uses, and provide policies to manage development in the city. It will need to include measures to improve public transport, protect and enhance the natural and historic environment, reduce carbon emissions, and protect against flooding. It will be used to make decisions about planning applications.

1.2 The environmental, social and economic impacts of Local Plans must be assessed through Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). SA/SEA aims to ensure that the decisions taken in the context of the Local Plan's preparation are made in the knowledge of all likely sustainability effects of the proposed policies and reasonable alternatives, seeking to minimise negative impacts and maximise positive ones. The Oxford Local Plan 2045 SA process incorporates the requirements of SEA within them, and any reference to the Sustainability Appraisal/SA should be taken as also including the Strategic Environmental Assessment/SEA where relevant.

1.3 Sustainability Appraisal is an iterative process that aligns with the various stages of the Local Plan's development (as per Figure 1.1). The report is supported by a range of topic-specific background papers which expand on key information, particularly in relation to scoping and options for policies.

Figure 1.1. The Sustainability Appraisal and the wider Local Plan preparation process

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1.4 This Sustainability Appraisal report, which accompanies the Regulation 19 Local Plan consultation, sets out how the Council has undertaken work associated with the formal SA process stages, as set out in Table 1.1. The Council has previously consulted on two versions of the emerging SA, including an early draft of the scoping report that was shared with the Environment Agency, Historic England and Natural England (February 2025), and an Interim Sustainability Appraisal that was published as part of the Regulation 18 consultation (June/July 2025).

Table 1.1. The Sustainability Appraisal (SA) process and the stages of the Oxford Local Plan 2045 preparation

Stages of the Sustainability Appraisal process	**Relevant consultation**
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	Relevant bodies* were consulted on early draft of scoping report to agree

Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	scope (Feb-March 2025) **Complete** Updated version of scoping report published as part of Interim SA Report (Part 1) for Summer 2025 Reg 18 consultation **Complete**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as part of the Interim SA Report (Part 2) for Summer 2025 Reg 18 consultation **Complete**
Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects Task B5: Propose measures to monitor significant effects of implementing the Local Plan *Stage C: Prepare the SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Published as part of this Regulation 19 SA report - including updated information related to earlier stages. **Current stage**
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

** The Environment Agency, Historic England and Natural England*.

1.2 Policy context

1.5 The National Planning Policy Framework (NPPF) requires local authorities to deliver enough homes, build a strong economy, support non-car travel, protect the Green Belt, support good design, deal with climate change, and protect nature and heritage. This is underpinned by various pieces of online guidance in the Planning Practice Guidance, as well as specific guidance in relation to design via the National Design Guide and Model Design Code. The Environment Act 2021 will require development to deliver at least 10% biodiversity net gain.

1.6 The Levelling Up and Regeneration Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes. Many of the changes provided for in the legislation are dependent on subsequent regulations, including replacing SA/SEA with “environmental outcomes reports”, setting up national

development management policies that would apply to all local authorities, and removing local authorities' duty to cooperate with neighbouring authorities.

1.3 Sustainability context and existing problems

1.7 The city of Oxford is a compact one, with areas of dense urban development, interspersed by areas of natural green space and various blue corridors such as the rivers, streams and canal that interweave them. The city has a wealth of historic assets, and hosts a number of important ecological habitats of varying designations. The presence of the rivers and urbanisation in many areas makes flood risk a particular concern in many areas of the city; the impacts of climate change are likely to exacerbate this as well as other risks such as overheating.

1.8 The population of the city skews particularly to younger age groups and hosts a significant student population due to the two universities. Whilst there are areas of wealth, there are also areas characterised by high levels of deprivation and inequalities are a significant challenge in relation to health and wellbeing, as well as skills and access to jobs for some residents. Constraints on the city make space for new development limited, this has various knock-on-effects, particularly for access to housing and housing affordability.

1.9 The adopted Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development, as well as new local aspirations such as the target of being a net zero carbon city by 2040. There are ongoing challenges such as the continued housing crisis, the changing picture of retail, pressures on biodiversity and impacts of pollution on the environment from various activities.

Table 1.2. A summary of the current situation and likely future without a plan.

SA topic	Current situation	Likely future without plan	Summary findings
1. Carbon emissions	-	-	Carbon emissions in Oxford show a steady decline, principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite an overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. There will be an ongoing need for significant retro-fitting of

			existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales.
2. Resilience to climate change	--	-	A significant area covering properties and other land uses in Oxford is at risk from flooding. This risk is likely to increase with climate change. National policy is strong on flood risk, also a flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Overheating is an increasing risk facing the city although national building standards have been updated to address overheating to some degree.
3. Efficient use of land	0	0	Increased housing pressure means that there will be more pressure on undeveloped land. Without a new plan, housing may be developed in less sustainable locations. Development density and protection of undeveloped land have been good to date, which also helps protect soils and some known peat-rich soils.
4. Local housing needs Need and supply	--	--	Oxford's housing need is more than the identified capacity in the city. The city is limited in terms of large housing sites. Some of Oxford's housing needs may therefore need to be met outside the city.
Affordable housing	--	--	House prices in Oxford are already very high, including for rent, and future prices are likely to continue to rise more quickly than average salaries. Annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme but still unlikely to meet need.
Students and student accommodation	0	0	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5. Inequalities and health Inequality	-	--	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health, likely exacerbated by the cost of living crisis.
General health	+	+	Despite more localised inequalities, Oxford residents' general health is good and the higher-than-average levels of activity and healthy weight need to be maintained and increased.
Health and housing	-	--	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits.
6. Services, facilities and infrastructure Community facilities	0	-	Oxford's compact nature means there are many areas which benefit from good access to services/facilities, however this is not universal across city. Increasing population will become make it more important to protect and enhance facilities. Economic shocks like the pandemic, rising costs of energy and living in general continue to put pressure on services and facilities, however. Changes to use class order (e.g.use class E) make it harder to protect particular services/facilities locally.
'Grey' infrastructure	-	-	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon. The Local Plan has enabling role in supporting improvements but alone has limited

			influence. They also rely upon investment and infrastructure upgrades by others with primary responsibility such as the utilities providers.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7. Green infrastructure and leisure	++	+	Oxford has a wide range of green spaces which are generally of good quality, although unevenly distributed and protected through existing Local Plan. As Oxford's population increases, there will be increasing pressure on green spaces. Limited development opportunities mean an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features.
8. Traffic and air pollution Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at various major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. County led actions as well as national phasing out of petrol/diesel cars will help to improve air quality.
Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. Population and job growth envisaged for Oxfordshire means a continuation of existing levels of car use would threaten to over-burden the transport network. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9. Water Water resources	-	--	Oxford is in an area of serious water stress and current Local Plan sets water use limits on new development in line for this reason. Water resources are currently adequate but may not be by 2045 due to challenges like climate change and a growing population. Thames Water have various interventions planned through their Water Resources Management Plan (2024) to help address resources. There are various ecological sites in the city which are sensitive to changes in hydrology and the Local Plan 2036 protects these sites.
Water quality	-	?	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence though impacts from increased development could worsen this. The extant Local Plan includes policies that help address water quality however. Upgrades are in progress to address capacity concerns for the Oxford Sewage Treatment Works, and as these come online the situation is likely to improve for water quality.
10. Biodiversity	-	0	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally, superseding existing policy in Local Plan 2036. The new Local Nature Recovery Strategy identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue.
Nature conservation areas	+	0	Nature conservation areas such as Oxford Meadows SAC are currently well protected nationally and locally. The absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).

11. Urban design and historic environment	**++**	**+**	Oxford has a high-quality landscape and historic environment and various national protections exist for designated historic assets. Non-designated local assets will continue to be protected under current Local Plan. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape/townscape.
12. Employment and economy Employment	**++**	**++**	Oxford has a very strong economy, with high employment and with strong demand for research and development uses, which is a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.
Unemployment	**++**	**++**	Future employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people. Also, see analysis against 'employment' above.
Education, skills and employability / training	**+**	**?**	Oxford's population overall is highly skilled, but there are parts of the city where the local population is classified within the 10% most deprived for educational skills and training in the country. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	**0**	**0**	Unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

1.10 Key problems in Oxford include:

- Oxford has very high housing costs, limited land available for housing, and difficulty in providing affordable housing.
- There are high levels of inequality across the city which particularly affect economic advantages for certain residents as well as health and wellbeing.
- Much of Oxford is prone to flooding: this is likely to increase with climate change.
- Oxford is still far from achieving its 2040 target of net zero carbon emissions.
- All of Oxford is an Air Quality Management Area because of transport pollution.
- Nature in Oxford, and nationally, is under pressure from climate change, air pollution, and development.
- Oxford is in an area of serious water stress and experiences ongoing challenges around water quality in its watercourses due to various sources of pollutants, although good progress is being made working with Thames Water and the EA on the issue of wastewater treatment, which is a key contributor.

1.4 SA/SEA Framework

1.11 This SA/SEA uses the framework at Table 1.2 to assess the impacts of the Oxford Local Plan 2045 policies. An adapted framework, with more site-specific criteria underlying each objective, is used for development sites.

Table 1.2: The SA/SEA framework used to assess the impacts of the new Local Plan policies.

SA/SEA Framework
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.
5. To reduce poverty, social exclusion, and health **inequalities**.
6. To provide accessible essential **services and facilities**.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.
9. To achieve **water** quality targets and manage water resources.
10. To conserve and enhance Oxford's **biodiversity**.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

1.12 The scoring matrix set out in Table 1.3 is used for assessing various impacts throughout this report. The scoring highlights whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 1.3: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	**++**
Positive impacts (compared to the current situation)	**+**
Neutral / none	**0**

Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?
Depends upon implementation	I

1.5 Developing and testing Local Plan options

1.13 The SA report explores options / alternative approaches with a focus on key elements of the Local Plan in order to ensure that the SA focuses only on 'significant effects', which are as follows:

- The Local Plan growth strategy
- Select thematic policy areas
- Site allocations

1.14 Oxford has many constraints such as flood plain, designated sites of ecological importance, and designated heritage assets which limit the amount of available land over which growth can occur within the city's tight administrative boundaries. Six growth strategy alternatives have been identified and appraised (Table 1.5), each involving a different approach to balancing housing and employment, as well as wider development needs alongside other Local Plan objectives. The growth strategy alternatives are framed around two key questions:

1. should the focus be on balancing development needs with wider Local Plan objectives or, alternatively, fully maximising the development capacity of sites whilst minimising requirements for other provisions like open space or greening (with a distinction between brownfield and greenfield sites); and
2. should the focus first be on meeting housing needs or employment land needs. The chosen growth strategy for the Local Plan is a balanced one that has a focus on providing for housing.

Table 1.5: Growth strategy alternatives considered for Oxford Local Plan 2045.

	Balanced development	Boost brownfield supply	Boost greenfield supply
Prioritise housing	Option 1a (The chosen growth strategy)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

1.15 The growth strategy alternatives have been appraised using the SA framework. The results of the appraisal (Table 1.6) indicate that Option 1a, (the chosen growth strategy for the Oxford Local Plan 2045), performs most sustainably and is associated with the most positives and fewest negatives. Whilst a case could be made for options 2b, 3a and 3b from either a housing (option 3a), or an economic growth perspective (options 2b and 3b), this would come at considerable cost in terms of wider objectives.

Table 1.6: Summary of appraisal results for the growth strategy alternatives

SA Objective	Option 1A	Option 1B	Option 2A	Option 2B	Option 3A	Option 3B
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?
6. Services and facilities	+/-	+	+/-	+	-	-
7. Green infrastructure, leisure and recreation	+	+	+/-	+/-	--	--
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--
9. Water	+/-	+/-	-	-	--	-
10. Biodiversity	0	0	0	0	-	-
11. Good urban design / the historic environment	+	+	--	--	--	--
12. Economic growth	+	+	+	++	+	++

1.16 Guided by the overall growth strategy, the policy team considered different ways of writing the Local Plan, including identification of various policy options to help inform the preferred approaches to the 40+ draft policies. The supporting background papers document the sets of options/alternatives for each of the policies consulted on at Regulation 18 stage, referred to as 'options sets'.

1.17 All options sets were appraised at a high-level against the SA objectives (as is documented in the relevant background papers). Some of the options for particular policies were considered to have likely significant effects against one or more of the SA objectives. These options sets were scoped into the Sustainability Appraisal for a detailed appraisal to more fully understand how they performed in sustainability terms and are as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

1.18 The findings from these appraisals contributed to the decision about preferred approach for these policies and were helpful in informing where potential mitigations might be needed to ensure the overall strategy was as sustainable as possible. The background papers each set out how the Council came to identify its preferred options for policies and this drew upon the testing that was undertaken as part of the Sustainability Appraisal where relevant.

1.19 The Local Plan also includes site allocation policies. Identifying and developing site allocations is an iterative process that draws from multiple areas of work including the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Needs Assessment (ELNA).

1.20 The Council has followed a 'no stone left unturned' approach to identify as many allocations for development as possible in order to meet identified need for the city. This includes initially identifying a large list of potential sites from a wide range of sources. These potential sites are then assessed and filtered with consideration of their availability for development (e.g. landowner intent) and suitability for development (bearing in mind fundamental environmental constraints) resulting in a refined list of allocations.

1.21 The proposed list of allocations were assessed against a modified version of Sustainability Appraisal Framework Draft which considers sustainability impacts against

the 12 SA objectives. An individual SA site assessment proforma has been completed for all proposed allocations and these are published separately. The assessment process informs the appraisal of Local Plan sustainability impacts and any necessary mitigation to avoid significant effects by identifying where an allocation could have particular sustainability concerns (e.g. proximity to a watercourse, or sensitive heritage asset) in relation to the SA objectives.

1.6 Assessing the Local Plan's impacts

1.22 Table 1.7 sets out a summary of the overall impacts of the Local Plan which is set out more fully in Chapter 6 of the report. Other plans, projects and underlying trends will have additional impacts and these are discussed in the full table in Chapter 6 also.

Table 1.7: Summary of overall impacts of the Local Plan

SA/SEA topic	Overall impact	Comments
1. Carbon emissions	**+/-**	Local Plan includes a range of policies which will support meeting local and national net zero carbon targets, including net zero buildings in operation, embodied carbon and retro-fitting as well as policies supporting walking/cycling/wheeling and public transport access. Additional growth, including 9,267 of new homes to 2045 will be associated with some level of new emissions, particularly in relation to construction. Some impacts are likely to reduce, e.g. as national grid continues to decarbonise, other impacts will be take longer to address and will require further advances in technologies/construction practices (e.g. in relation to carbon impacts of construction).
2. Resilience to climate change	**+/-**	Local Plan includes a specific resilient design policy as well as other policies supporting aspects of climate resilience including greening policies, flood risk, SuDS, Health Impact Assessment. New development is likely to further urbanise parts of the city, resulting in some loss of green space, and some development in areas of flood risk including some site allocations. The new Oxford Flood Alleviation Scheme will help to address flood risk in parts of the city, however, climate change will continue and this could exacerbate climate risks like overheating or introduce new ones.
3. Efficient use of land	**+/-**	Efficient use of land is a theme running throughout the Local Plan, with specific policies encouraging appropriate densities, restrictions on new car parking, retaining high-quality green features, all helping to ensure limited land is used efficiently. Arguably, strong protection for a network of green space and heritage could be seen to reduce efficient use of land, but this would support sufficient safeguards for wider environment. The requirement for new homes will result in some loss of green field sites, but these would potentially allow for more efficient development in terms of higher density and reduced reliance on cars than if they were built elsewhere.

SA/SEA topic	Overall impact	Comments
4. Local housing needs	**+**	The Local Plan prioritises new housing across available sites over other uses in response to the city's high housing need. The city's identified housing need is for 1,087 new homes per year and the Local Plan's capacity based requirement looks to provide for 9,267 of new homes (463 homes per year) to 2045. Whilst the Local Plan's requirement will make an overall positive contribution to housing need in a highly constrained area whilst balancing out other Local Plan objectives, this will leave an under-provision which adjacent local authorities would likely need to fill. The Local Plan includes policies that seek to secure affordable housing and a number of policies addressing specialist housing to meet needs of other groups.
5. Inequalities	**+**	The focus on delivering new homes in the city, including affordable housing will help to address a key source of inequality in the city. The Local Plan strongly supports walking/cycling/wheeling and access to public transport and other daily needs via local/district centres, helping people who do not have access to a car. Policies supporting protection of green spaces, new greening on developments as well as a specific health impact assessment policy will also support health and wellbeing. Some wider pressures such as the ongoing cost-of-living crisis bring about some level of uncertainty about wider impacts on inequality and how these will interact with the Local Plan's proposals.
6. Services and facilities	**0**	Additional growth is likely to put additional pressures on key services, facilities and infrastructure, however, the Local Plan aims to ensure that adequate infrastructure, including services in district and local centres, are provided to support planned growth. The plan aims to prevent the loss of community facilities, schools and cultural sites and to direct certain uses towards accessible locations in the city/district/local centres.
7. Green infrastructure, leisure and recreation	**0**	The Local Plan includes strong protection for a network of green spaces of various types and other features across the city, as well as policies seeking to ensure minimum levels of greening across new development sites. Equally, the provisions for growth including new housing will result in the loss of some green infrastructure, though the Local Plan policies and specific requirements in the allocations seek to focus losses on lower quality features and to mitigate impacts.
8. Traffic and associated air pollution	**+/-**	The Local Plan has various policies that seek to reduce reliance on car including requirements for low car development, vibrant centres, appropriate development densities, and bike parking. Additional housing provision in the city could help to reduce numbers of in-commuters as more people are enabled to live closer to work, however, it could increase levels of car ownership depending on how this housing is implemented. Unmet housing need that would have to be delivered beyond the boundaries may have impacts, but this is highly dependent on the manner in which it is brought forward (e.g. location and access to public transport). The Local Plan includes requirements for addressing impacts on air quality, and whilst there may be short term impacts on air quality (e.g. from new vehicles or construction) these are likely to reduce over time in combination with county measures and national drivers (e.g. phasing out of fossil fuel vehicles).
9. Water	**-**	Population growth/new housing will incur additional demands on water. In terms of water resources, the Local Plan sets limits on water use and seeks a range of water saving measures to limit impacts, though it is unlikely to totally mitigate additional

SA/SEA topic	Overall impact	Comments
		demand and additional measures planned for by Thames Water will be important for helping to meet future demands on water supplies. The Local Plan includes various requirements for protecting water quality, including buffers for water courses, measures to prevent impacts of pollution, as well as greening policies which should help to mitigate impacts of further urbanization. Alongside important upgrades in progress to the Oxford Sewage Treatment Works to address current and future demands on wastewater treatment, impacts on water quality are expected to be able to be mitigated.
10. Biodiversity	**+/-**	The Local Plan is protecting a network of green infrastructure across the city which will have benefits for supporting a range of species, alongside additional protections for designated sites. There are also policies requiring onsite enhancements for species and minimum levels of greening which should complement national requirements for Biodiversity Net Gain. However, biodiversity continues to be under pressure across the country, subject to a range of national/internation drivers like climate change. Additional urbanization in the city associated with new development will also result in some losses of green features that could impact species (though the Plan also includes mitigation requirements to address impacts).
11. Good urban design / the historic environment	**+/-**	The Local Plan's heritage policies aim to protect the city's heritage. Its design policies promote high-quality design. There are a number of site allocations within conservation areas or in proximity to designated assets that could have impacts on townscape and heritage unless these are appropriately mitigated in line with the Local Plan's requirements. Equally, various sustainability requirements, e.g. in relation to net zero carbon and greening, will necessitate different approaches to design than what has been built in the past, though equally these could be construed as important components of 'high-quality' design today, so impact on local townscape could be mixed and will be highly dependent on implementation.
12. Economic growth	**+**	The Local Plan's employment strategy seeks to modernise and intensify existing employment sites, while supporting a flexible approach to land-uses within the city and district centres to be able to respond quickly to changing needs and economic circumstances. The focus on providing for new housing will also help to address a key barrier to economic growth, which is employees' inability to find affordable housing close to where they work in the city. The Local Plan includes measures that seek to secure affordable workspaces and provide local people with skills/training opportunities through Community Employment and Procurement Plans, and this will help to address local barriers to employment and economic growth.

1.7 Minimising negative impacts and maximising positive impacts

1.23 In the preparation of the Oxford Local Plan 2045, informed by the Sustainability Appraisal process, the Council has incorporated a range of mitigation measures to minimise negative impacts and maximise positive ones. There are a number of key policies

which form important mitigation for the Local Plan in relation to a number of topics including:

- **Limiting carbon emissions** – **Policy R1** requires all new buildings to be net zero in operation; **Policy R3** strongly supports retro-fitting of existing buildings to reduce their carbon impacts; **Policy R2** strengthens requirements for addressing embodied carbon in construction.
- **Traffic and air pollution –** Policies within **Chapter 7**, seek to promote walking/cycling/wheeling and improved access to public transport. Additionally, **Policy R4** sets out various requirements to address air quality impacts.
- **Water – Policy R5** sets requirements meeting water use limits and incorporating other water conservation methods, as well as ensuring no adverse impacts on water quality. Also supported by policies such as preserving amenity and environmental health from release of pollutants (**Policy R8**), additional protections for sensitive ecological sites (**Policy G6**), requirements for ecological buffers (**Policy G2**), and greening on developments (**Policies G2, G3**).
- **Green infrastructure and biodiversity – Policy G1** protects a network of green spaces, including national and local designated ecological sites. Additional protections related to designated ecological sites is assigned through **Policy G6**. Strong requirements in relation to providing new green features (**Policies G2 and G3**) as well as requirements for onsite ecological enhancements (**Policy G5**)**.**
- **Infrastructure and services –**The Infrastructure Delivery Plan identifies the key infrastructure needs in the city and the Local Plan includes a strategic policy (**Policy S3**) which aims to ensure that essential infrastructure needs to facilitate new development are provided for and is important for helping to ensure the plans proposals

1.24 Additionally, the Council has undertaken individual site assessments for site allocations using an adapted version of the Sustainability Appraisal framework to appraise the sites for likely significant effects. Where potential adverse effects of development on the allocations has been identified, the Local Plan's site allocation policies (as set out in Chapter 8 of the plan) incorporate mitigation measures to minimise or obviate those impacts. These measures typically cross refer to key policies such as those highlighted above, where there are site specific considerations that need to be taken into account in mitigating for any impact.

1.8 Monitoring the Local Plan's impacts

1.25 The social, environmental and economic impacts of the Local Plan will be monitored and Table 1.8 sets out the proposed monitoring framework. The impacts of the plan will be monitored every year and some wider sustainability outcomes will be monitored every three years.

Table 1.6: Proposed monitoring framework.

SA/SEA topic	Monitoring of Local Plan 2045 outcomes (every year)	Monitoring of sustainability outcomes (every 3 years)
1. Carbon emissions	Contributions secured towards and proportion spent from energy offset fund (assumes that all other developments are net zero carbon)	Change in per capita CO2 emissions
2. Resilience to climate change	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3
3. Efficient use of land & 7. Green infrastructure and leisure	Applications permitted on protected green space	
4. Local housing needs	Net housing completions	Change in population / households
5. Inequalities	Net affordable housing completions	Changes in inequalities according to indices of Multiple Deprivation
6. Services, facilities and infrastructure	Applications permitted for new community spaces, cultural venues and visitor attractions	Significant new community assets
8. Traffic and air pollution	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford
9. Water		Changes in quality of watercourses according to WFD classifications for chemical quality and biological quality.
10. Biodiversity	Biodiversity net gain being delivered in the city.	Condition of SSSIs, integrity of SAC, condition of local wildlifes sites.
11. Urban design and heritage	Applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments	Change in no. heritage assets at risk
12. Economic growth	Net gain / loss of employment floorspace (sqm)	% employment / unemployment in the city

1.9 Next steps

1.26 The Regulation 19 Oxford Local Plan 2045 and this Regulation 19 Sustainability Appraisal report will be consulted on in XX. The Local Plan will be submitted for examination in XX, and it is expected to be adopted in XX.

2. Introduction

2.1 This Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) report accompanies the Regulation 19 consultation on the proposed Oxford Local Plan 2045. This chapter gives a high-level introduction to the city of Oxford; discusses the Oxford Local Plan 2045, as well as the requirements of SA and SEA, and then sets out the structure of the rest of the report.

2.1 Background to Oxford City

2.2 Oxford City Council is a district council at the heart of Oxfordshire. It has a total area of about 46 km^2 (17.6 miles^2), parts of which are very densely developed. The built-up area of the city extends to the administrative boundary around much of the eastern half of Oxford, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This uneven distribution of urban and rural landscapes gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre (Figure 2.1).

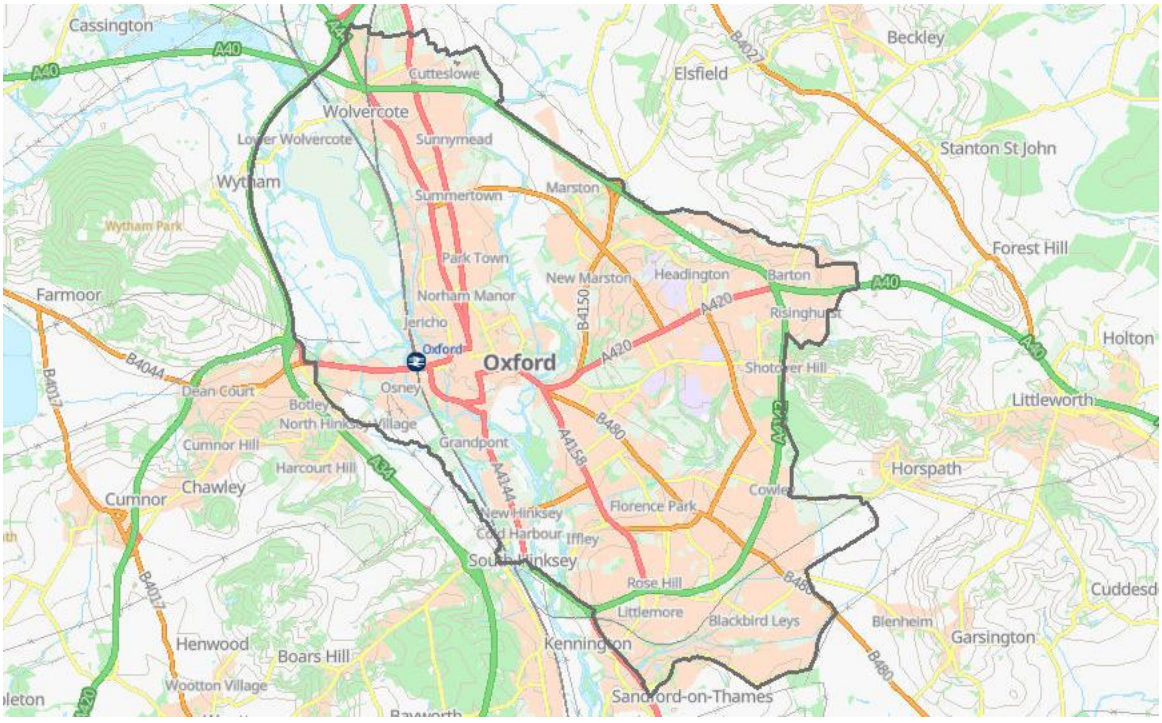

Figure 2.1: Map of Oxford including administrative boundaries of the City Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.)

2.3 Oxford's population is approximately 166,034 according to the Office for National Statistics (Mid-year population estimates, July 2025). The 2021 census estimated that one-third of the population is aged between 18 and 29, more than double the national average.

Oxford is home to 34,945 students, and 4,885 businesses providing 131,000 jobs. There is a high level of in-commuting in the city with the 2021 census recording that of the 57,315 commuters working in Oxford, 28,342 were from outside the city (*although the 2021 census data is likely to have been influenced by the Covid-19 lockdown measures including requirement to stay at home where possible*).

2.4 Oxford is a compact city with a unique and world-renowned built heritage which draws many visitors each year. Its original Saxon street pattern and some of the earliest buildings and monuments still survive. Around 27% of Oxford is within the Green Belt which is an important contributor to the city's historic setting and, unusually, not only constrains development in the outer cordon of the city, but also through the city's heart. Oxford sits at the confluence of the Thames and Cherwell rivers and is quite flat, so it is prone to flooding from a range of sources. The rivers form an intrinsic part of the unique environment of the city and promote tourism and a range of important water-based sports and social activities in the city. The historic city parks and nature conservation areas create pockets and corridors of green within the administrative boundary; several have national and international nature conservation designations, further constraining development, and a number of green spaces also contribute to the historic character of the city.

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

2.6 Oxford has remained economically very successful despite the global recession of the 2000s, Brexit and the Covid pandemic. The government sees Oxford as playing a key role within the 'Pan-Regional Partnership' between Oxford and Cambridge, with high future housing and economic growth.

2.2 The Oxford Local Plan 2045

2.7 The Oxford Local 2045 carries forward and updates policies set in the Oxford Local Plan 2036. Its preparation has built upon the considerable amount of resource and effort that went into the preparation of the withdrawn Local Plan 2040, whilst taking opportunities to revisit and reappraise the policy framework supported through further rounds of consultation and engagement with various stakeholders.

2.8 Whilst earlier stages of consultation had envisioned the new Local Plan setting out a vision for the city to 2042, as was the case for the early engagement consultation of spring 2025 and the Regulation 18 consultation of summer 2025, the Regulation 19 consultation document now establishes the Plan period running through to 2045. This Regulation 19 Sustainability Appraisal report has been prepared in light of this updated context, including reviewing and revising where necessary the content previously published for consultation as part of the Interim Regulation 18 Sustainability Appraisal report (which remains available in the evidence base).

2.9 The Oxford Local Plan 2045 vision is as follows:

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare.

Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper.

The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air.

The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.

2.10 The vision is underpinned by six themes that are adapted from the three pillars of sustainability and their interconnections, as is illustrated in Figure 2.2. There are various specific objectives for the city which sit under each of these themes and these are discussed further in Chapter 4. The Plan also includes several overarching threads which interconnect throughout the document and across the six themes – these are: addressing climate change; reducing inequalities; and ensuring a liveable city.

Figure 2.2: The Local Plan's themes and overarching threads which interweaves between them.

Figure to be added for publication.

2.11 The Local Plan allocates sites for housing and employment. It also sets policies for the management of development in the city including: the conservation and enhancement of the historic and natural environment, including biodiversity; guiding the quality of urban

design; achieving the city's net zero targets and flood risk management. The Local Plan will be used in determining planning applications and helping guide investment decisions across the city alongside other key documents such as neighbourhood plans and Supplementary Planning Documents.

2.12 The range of policies within the Local Plan, excluding those relating to site allocations and areas of focus, are set out in Table 2.1.

Table 2.1: The policies of the Oxford Local Plan 2045

Ref	Policy title
S1	Spatial Strategy and Presumption in Favour of Sustainable Development
S2	Design Code and Guidance
S3	Infrastructure Delivery in New Development
S4	Plan Viability
H1	Housing Requirement
H2	Delivering Affordable Homes
H3	Affordable Housing Contributions from Other Development Types
H4	Employer-Linked Affordable Housing
H5	Mix Of Dwelling Sizes (Number Of Bedrooms)
H6	Development Involving Loss Of Dwellings
H7	Houses In Multiple Occupation
H8	Location Of New Student Accommodation
H9	Linking New Academic Facilities With The Adequate Provision Of Student Accommodation
H10	Homes For Travelling Communities
H11	Homes For Boat Dwellers
H12	Older Persons And Other Specialist Accommodation
H13	Self-Build & Custom Housebuilding
H14	Boarding School Accommodation
E1	Employment Strategy
E2	Warehousing, Storage And Distribution Uses
E3	Community Employment And Procurement Plans
E4	Affordable Workspaces
E5	Hotel And Short Stay Accommodation
G1	Protection Of Green Infrastructure
G2	Enhancement And Provision of New Green And Blue Features
G3	Provision Of New Green And Blue Features – Urban Greening Factor
G4	Delivering Mandatory Net Gains In Biodiversity
G5	Delivering Onsite Ecological Enhancements
G6	Protecting Oxford's Biodiversity Including The Ecological Network
G7	Flood Risk And Flood Risk Assessments (FRAs)
G8	Sustainable Drainage Systems (SuDS)

G9	Resilient Design And Construction
R1	Net Zero Buildings In Operation
R2	Embodied Carbon
R3	Retro-Fitting Existing Buildings
R4	Air Quality Assessments And Standards
R5	Water Resources And Quality
R6	Soil Quality
R7	Land Contamination
R8	Amenity And Environmental Health Impacts Of Development
HD1	Principles Of High-Quality Design
HD2	Making Efficient Use Of Land
HD3	Designated Heritage Assets
HD4	Non-Designated Heritage Assets
HD5	Archaeology
HD6	Views And Building Heights
HD7	Health Impact Assessment
HD8	Privacy, Daylight And Sunlight
HD9	Internal Space Standards For Residential Development
HD10	Outdoor Amenity Space
HD11	Accessible And Adaptable Homes
HD12	Bin And Bike Stores And External Servicing Features
C1	City, District And Local Centres
C2	Maintaining Vibrant Centres
C3	Protection, Alteration And Provision Of Local Community Facilities
C4	Protection, Alteration And Provision Of Learning And Non-Residential Institutions
C5	Protection, Alteration And Provision Of Cultural And Social Venues And Visitor Attractions
C6	Transport Assessments, Travel Plans And Service And Delivery Plans
C7	Bicycle And Powered Two Wheelers Parking Design Standards
C8	Motor Vehicle Parking Design Standards
I1	Digital Infrastructure To Support New Development
I2	Safeguarding Land For Infrastructure

2.3 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

2.13 The Environmental Assessment of Plans and Programmes Regulations 2004, SI No. 1633 (hereafter the "SEA Regulations") is the governing legislation in England and Wales that manages the Strategic Environmental Assessment (SEA) process. While the SEA legislation focuses on assessing environmental effect, this assessment process is widened to include an analysis of social and economic effects through the legal

requirement to undertake a Sustainability Appraisal (SA) set out in Section 19 of the Planning and Compulsory Purchase Act 2004. According to the Planning Practice Guidance (PPG) section on Strategic environmental assessment and sustainability appraisal, "Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.

2.14 The SEA Regulations state that SEA must assess the likely significant effects of the plan or programme on the environment, namely:

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

2.15 There are various requirements of the SEA Regulations and Table 2.2 highlights these as well as where they are covered in the SA/SEA for the Oxford Local Plan 2045.

Table 2.2: Requirements of the SEA Regulations and where they are covered in the SA/SEA for the Oxford Local Plan 2045

Requirements of the SEA Regulations	**Where covered**
a) an outline of the contents, main objectives of the plan or programme…	Chapter 2 of this report
… and relationship with other plans or programmes	Chapter 3 of this report, and in individual Background Papers.
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 of this report and in individual Background Papers.
c) the environmental characteristics of the areas likely to be affected	In individual site assessment forms and summarised in chapter 6.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Habitat Regulations;	In individual Background Papers and summarized in chapter 3 of this report.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any	In individual Background Papers.

environmental considerations have been taken into account during its preparation;	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects);	Chapter 4 and Chapter 6 of this report.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 7 of this report
h) An outline of the reasons for selecting the alternatives dealt with…	Chapter 5 of this report
… and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 of this report.
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Chapter 8 of this report.
j) a non-technical summary of the information provided under the above headings.	Chapter 1 of this report.
Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4)	A summary of feedback received on the early draft of the scoping is included in Chapter 3/Section 3.5.
authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	A summary of the feedback received on the interim SA published for Reg 18 is included in Chapter 3/Section 3.5.
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as	Will be carried out upon plan adoption

adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Will be carried out from after plan adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	Throughout the process

2.16 Sustainability Appraisal is an iterative process to assist in the development of a Local Plan. It is used to appraise emerging options against the three elements of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the policies in the Local Plan. Ultimately, the SA documents 'the story' of the Local Plan's development.

2.17 There are different requirements for undertaking an SA compared to those for SEA; the requirements for undertaking SA are outlined in Table 2.3 below. This SA/SEA report fulfils the legal requirements for both SA and SEA. Where reference is made within this document to Sustainability Appraisal/SA, it also implies (where appropriate) strategic environmental assessment. The Council has consulted on two versions of this Sustainability Appraisal as it has emerged in advance of this Regulation 19 version, details of these are set out in the Table below, but in summary:

- An early draft of the scoping report was shared in advance of Regulation 18 consultation with the Environment Agency, Natural England and Historic England to confirm the scope of the Sustainability Appraisal (February 2025).
- An Interim Sustainability Appraisal report, including an updated scoping report, appraisal of options/alternatives for the Local Plan, and early whole plan appraisal was published as part of the Regulation 18 First Draft (Preferred Options) Local Plan consultation (June/July 2025).

Table 2.3: The Sustainability Appraisal (SA) process and the stages of Local Plan 2045 preparation

Stages of the Sustainability Appraisal process	Relevant consultation
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework	Relevant bodies* were consulted on early draft of scoping report to agree scope (Feb-March 2025) **Complete** Updated version of scoping report published

Task A5: Consult the consultation bodies on the scope of the SA report	as part of Interim SA Report (Part 1) for Summer 2025 Reg 18 consultation **Complete**
Stage B: Developing and refining alternatives and assessing effects Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as part of the Interim SA Report (Part 2) for Summer 2025 Reg 18 consultation **Complete**
Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects Task B5: Propose measures to monitor significant effects of implementing the Local Plan *Stage C: Prepare the SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Published as part of this Regulation 19 SA report - including updated information related to earlier stages. **Current stage**
Stage E: Post adoption reporting and monitoring Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

** The Environment Agency, Historic England and Natural England*.

2.18 The colour coding system as set out in Table 2.4 will be used throughout this SA/SEA. It is intended to score whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 2.4: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

Description of impact	Scoring symbol
Very positive impacts (compared to the current situation)	**++**
Positive impacts (compared to the current situation)	**+**
Neutral / none	**0**
Some positive and some negative impacts	**+/-**
Negative impacts (compared to the current situation)	**-**
Very negative impacts (compared to the current situation	**--**
Unclear	**?**

Depends upon implementation	I

2.4 Habitat Regulations Assessment

2.19 Oxford is home to part of the Oxford Meadows Special Area of Conservation (SAC), which is a site of international nature conservation importance because of its lowland hay meadows and creeping marshwort (Apium repens). The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Port Meadow is the largest of only two known naturally occurring sites in the UK for creeping marshwort.

2.20 A Habitat Regulations Assessment (HRA) is a legal requirement to test if a plan or project proposal could have a significant impact on the conservation objectives of designated sites such as the SAC. In the Council's work on the Oxford Local Plan 2036, and on the withdrawn Local Plan 2040, the Council has produced Habitat Regulations Assessments and maintained regular engagement with Natural England throughout. This work previously identified that potential impacts on air quality, recreational disturbance, and changes to local hydrology/ water quality are all issues which require assessment through the Habitat Regulations Assessment process.

2.21 The Council has published a Habitat Regulations Assessment (comprising of an updated screening and Appropriate Assessment) for the Regulation 19 consultation. This takes into account ongoing engagement with Natural England, including their feedback on the screening report published at Regulation 18.

2.22 The assessment currently concludes that the Oxford Local Plan 2045 will not affect the integrity of the Oxford Meadows SAC through air quality impacts (either 'alone' or 'in-combination'). With the suite of mitigation measures proposed through the Stage 2 Appropriate Assessment, it also concludes that the Local Plan will not affect the integrity of the Oxford Meadows SAC through recreational (dog fouling) impacts, impacts on water levels or quality (either 'alone' or 'in-combination').

2.5 Health Impact Assessment

2.23 Whilst there are no distinct legislative requirements to do so, the Council is also undertaking a separate Health Impact Assessment process. This reflects the reality that planning and the built environment can have a significant role to play in shaping healthier environments (or hindering them) for people, which is particularly pertinent to Oxford, being a city characterised by health inequalities across its population. This separate form

of assessment is a valuable way of helping to identify the key positive and negative health impacts that could arise from proposed policies in the new Local Plan.

2.24 A scoping study was previously undertaken to inform the Regulation 18 stage of the Local Plan's preparation and was published as part of that consultation for feedback. The Council has produced a further assessment which reviews the proposals of the Regulation 19 Submission Draft Local Plan in the context of health and wellbeing impacts and this is available separately as part of the consultation.

2.6 Difficulties in compiling the SA/SEA

2.25 There were no significant difficulties encountered in compiling this report. Where the interim report published previously encountered some data gaps due to work still being prepared, the previous analysis has now been reviewed afresh and updated where necessary.

2.7 Structure of this report

2.26 This report has been prepared by Oxford City Council. It comprises an updated version of 'Stage A' and elements of 'Stage B' as were first published in the summer of 2025 during the Reg 18 consultation, as well as the remainder of Stage B, as set out in Table 2.3 earlier. The following chapters of the report are structured as follows:

- Chapter 3 – an updated version of the scoping report (Stage A1 – A5)
- Chapter 4 - an appraisal of the Local Plan vision and themes/objectives (Stage B1)
- Chapter 5 – presents and appraises the alternatives to the Local Plan (Stage B2)
- Chapter 6 – appraises the Local Plan's policies and site allocations (Stage B3)
- Chapter 7 – presents mitigation measures to minimise the Local Plan's negative impacts and maximise its positive impacts (Stage B4)
- Chapter 8 – sets out a monitoring framework for the Local Plan (Stage B5)
- Chapter 9 – Discusses next steps.

2.27 This Sustainability Appraisal report, particularly the scoping stages and identification of alternatives, is supported by more detailed analysis which is presented across a number of supporting Background Papers which expand on key information of relevance to the various topics they address. Previous iterations of these were published as part of the Regulation 18 consultation and similarly supported the Interim Sustainability Appraisal report at that stage also. Table 2.5 lists these papers, which can also be accessed via the evidence base online, as well as directly via the hyperlinks, and shows how they relate to the sustainability appraisal objectives which will be discussed in Chapter 3.

Table 2.5: Background papers and SA objectives/SEA themes

Relevant background paper(s)	**SA objective**	**SEA Themes**
008 Carbon reduction and climate resilient design 012 Transport	1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040	Climatic Factors, Air
008 Carbon reduction and climate resilient design 007 Flood risk, drainage and SUDS 010 Health and Wellbeing	2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	Water, Climatic Factors
006 Green belt 009 Natural Resources	3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	Soil, Material Assets, Biodiversity
001 Housing need, requirement and mix 002 Affordable housing 003 Specialist housing	4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	Material Assets, Population, Human Health
010 Health and Wellbeing	5. To reduce poverty, social exclusion, and health **inequalities**.	Population, Human Health, Material Assets
013 Livable city 014 Infrastructure	6. To provide accessible essential **services and facilities**.	Material Assets, Human Health
005a Green infrastructure 005b Biodiversity	7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	Landscape, Biodiversity, Human Health,
012 Transport 009 Natural Resources	8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	Air, Climatic Factors
009 Natural resources	9. To achieve **water** quality targets and manage water resources.	Water, Biodiversity
005a Green Infrastructure 005b Biodiversity	10. To conserve and enhance Oxford's **biodiversity**.	Flora, fauna, biodiversity
011a Urban design and placemaking 011b Heritage and archaeology	11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	Cultural Heritage, Landscape
004 Employment and inclusive economy	12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	Population, Material Assets

3. Updated Sustainability Appraisal scoping

3.1 This chapter presents the SA scoping work, a version of which was initially presented in the interim SA report that informed the Regulation 18 stage of the Local Plan's production. The chapter incorporates updates and refinements to that previous scoping work where appropriate, reflecting the more advanced point in the Local Plan's production and any subsequent changes in context including:

- Any additional considerations arising from the changing context of the Local Plan's production (e.g. updated Local Plan base and end dates; further detail in relation to the Local Plan's proposals and policies which have developed since Reg 18).
- Relevant feedback from the Regulation 18 consultation.
- Any other relevant changes to national or local context that have arisen since the interim SA.

3.1 Policy context (Sustainability Appraisal Task A1)

3.2 The Oxford Local Plan 2045 is influenced by a range of policies, plans, programmes and sustainability objectives. The key policies, plans and programmes that affect the entire plan are discussed below. Additional policies/plans/programmes that affect individual topic areas such as air quality and deprivation are discussed in the Background Papers which support the SA (as set out in Table 2.5).

3.1.1 National context

Levelling Up and Regeneration Act 2023

3.3 This Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes which are intended to boost development and speed up the planning process. Many of the changes provided for in the legislation are dependent on subsequent regulations before they would come into effect and detail as to how or when they will come into place specifically is limited. The various changes that the Act lays the groundwork for include:

- Greater digitisation of planning documents
- SA/SEA replaced by "environmental outcomes reports"
- Community Infrastructure Levy replaced by a new national infrastructure levy
- Development of a common framework of National Development Management Policies (including on a national model design code), and commensurate focusing of Local Plans on locally specific matters
- Repeal of the Duty to Cooperate

- Speeding up of the plan-making process
- Removal of the requirement for a rolling five-year supply of housing land where the Local Plan is up to date.

Environment Act 2021

3.4 This Act was signed into law in November 2021 and assigned government a range of new powers to set binding environmental targets for issues such as air quality, water, biodiversity, and waste reduction. From February 2024 (and April 2024 for small sites), it required the majority of new planning applications to deliver at least 10% biodiversity net gain, based on the DEFRA Biodiversity Metric. The Act also set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country, discussed further below.

Climate Change Act 2008

3.5 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels). Under the Act, the government is required to set interim reduction targets via carbon budgets, most recently the sixth carbon budget was agreed, whilst the seventh is expected to be set in 2025.

National Planning Policy Framework (NPPF) and associated guidance

3.6 The NPPF sets out the Government's planning policies for England and how these are to be applied and was most recently updated in December of 2024 (with minor revisions in early 2025). The NPPF addresses various topics that Local Plans should cover, including planning for housing, employment and protection of the environment (dealing with matters such as climate change, flood risk, biodiversity, high quality design and the historic environment). The various topic-specific background papers that inform this SA provide detailed summaries on the relevant aspects of the NPPF for each topic. A consultation was published in December 2025 on an updated NPPF and remains open at time of writing.

3.7 The NPPF is supported by an online National Planning Practice Guide and the National Design Guide of October 2019 which provides additional guidance on various topics. Again, where relevant, the supporting background papers expand on the relevant detail contained in these resources for each topic.

The Localism Act 2011

3.8 Introduced the right for communities to shape development in their areas through the production of Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders. Currently Oxford has five designated Neighbourhood Forums: Headington, Littlemore, Summertown/St. Margaret's, Wolvercote and Blackbird Leys. The Headington and Summertown/St. Margaret's Neighbourhood Plans were 'made' in July 2017 and April 2019 respectively, whilst the Wolvercote Neighbourhood Plan was 'made' in June 2021. The Littlemore Neighbourhood Plan was subject to examination in 2025 with the examiner recommending that the Plan could proceed to referendum subject to a number of modifications.

3.1.2 Regional context

Oxford-Cambridge Growth Corridor and Oxford Growth Commission

3.9 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire's Strategic Economic Plan and Action Plan, 2023/2024

3.10 The Strategic Economic Plan (SEP), published in 2023, updates and replaces Oxfordshire's previous economic strategies and is supported by an accompanying Action Plan (2024). Informed by a county-wide conversation, it provides a post-pandemic statement of economic priorities for Oxfordshire. The SEP charts a positive economic future for the county, and sets out a strategy to 2033 and includes four key objectives which the SEP will seek to advance, working in concert with other strategic processes across and beyond Oxfordshire, these are to:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation.
- Widen access to current opportunities and equip people and places as jobs change over the next decade.
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050.
- Ensure that Oxfordshire's places are sustainable and inclusive, and that local communities flourish.

Oxfordshire Local Transport and Connectivity Plan (LTCP), 2022

3.11 The Local Transport and Connectivity Plan, adopted in July 2022, is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents. The LTCP is supported by a number of strategies and plans which are relevant to Oxford—these are detailed further in the Transport Background Paper.

Central Oxfordshire Travel Plan, 2023

3.12 The Central Oxfordshire Travel Plan COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors. The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets.

3.13 For Oxford these include the expansion of the Zero Emission Zone; strategic traffic filters to reduce traffic levels in Oxford; a workplace parking levy; improving priority and safety of sustainable modes in the city and introduction of a Central Oxfordshire Movement and Place Framework (a joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration).

East-west Rail link

3.14 In December 2022, England's Economic Heartland published 'connectivity studies' for an East-West rail link from Oxford to Milton Keynes and Cambridge; rail links from Oxford to Northampton, Wellingborough and Peterborough; and other connectivity improvements. Upgrades in relation to the East-West rail route are ongoing with the latter stages still in the planning stage. A recent non-statutory consultation which included discussion around improvements to Oxford Station and the rail network in order to facilitate the delivery of East West Rail from Cambridge to Oxford closed in January of 2025.

Oxfordshire Minerals and Waste Core Strategy, 2017

3.15 Part 1 (the Core Strategy) was adopted in September 2017 and sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste in Oxfordshire over the period to

2031. A Part 2 that would address site allocations was originally intended to follow, however, this is no longer being pursued.

3.16 An updated development scheme published in July 2025 sets out that the intention of the county is to prepare a new Minerals and Waste Plan under the new plan-making system proposed by the Levelling Up and Regeneration Act 2023, once it is brought into effect. A review of the situation will take place in six months if the secondary legislation of the Act has not yet come forward. At present, there is currently no timetable for a new Minerals and Waste Plan's production.

Oxfordshire Local Nature Recovery Strategy

3.17 The Environment Act set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country. LNRSs are intended to identify important areas for biodiversity as well as opportunity areas for its enhancement. In November 2025, Oxfordshire County Council published the LNRS which covers the county, including the city of Oxford.

3.1.3 Local context

Oxford City Council Our Strategy (2024-2028)

3.18 The Council's ambition is for Oxford to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. We will nurture strong, inclusive communities and be a welcoming and supportive place for people from all backgrounds to work, live and visit. As part of the strategy, the Council has identified five priorities:

- Good, affordable homes
- Strong, fair economy
- Thriving communities
- Zero carbon Oxford
- A well-run council

Oxford's Economic Strategy (2022-2032)

3.19 This local strategy seeks to establish a new standard for economic inclusion in the city, underpinned by an impactful and purposeful contribution to the UK and global economy. It also seeks to rapidly address the environmental impacts of economic activity and harness the opportunities of a new net zero carbon economy.

Oxford Climate Emergency declaration and Zero Carbon Action Plan

3.20 In January 2019, Oxford City Council declared a climate emergency. Subsequently a number of organisations across the city came together to agree a net zero carbon target of 2040, ten years in advance of the national net zero target date. In March 2021, the various stakeholders in the city who comprise the Zero Carbon Oxford Partnership (ZCOP), and including the Council, published an Action Plan and Roadmap for bringing about a net zero carbon city by 2040, or earlier. The document outlines key milestones and actions which need to be taken in different sectors from 2020 to 2050 including in relation to planning and design of the built environment.

3.21 The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

3.1.4 Other Key Plans, Programmes and Environmental Objectives

3.22 Originally originating from European Union, there are several pieces of environmental legislation influencing planning policy in the UK that have subsequently been transposed into UK law. These include:

- the Habitats Directive (92/43/EEC) which were transposed into the Conservation of Species and Habitats Regulations 2017 (amended in 2019),
- Air Quality Directive (2008/50/EC) which is transposed into the Air Quality Standards Regulations 2010
- Water Framework Directive (2000/60/EC) which is transposed into the Water Environment Regulations (Water Framework Directive) 2017.

3.2 Sustainability context (Sustainability Appraisal Task A2)

3.23 In the absence of a new Oxford Local Plan 2045, the currently adopted Oxford Local Plan 2036 would continue. It is important to understand the current sustainability context for the city and how this could change in future under this scenario before we can consider the impacts of taking forward any new Local Plan and this is discussed further in the following section.

3.2.1 Current situation and likely future without a new Local Plan

3.24 Table 3.1 presents an analysis, supported by the assessments presented within the supporting Background Papers, which summarises the current situation and the likely situation if the current Local Plan 2036 continued but no new Local Plan was prepared. It helps to inform the baseline from which to assess the impacts of the new Oxford Local Plan 2045 as it is prepared.

Table 3.1: Current situation and likely future without the plan

SA topic	Current situation	Likely future without plan	Summary findings
1.Carbon emissions	-	-	Per capita carbon emissions in Oxford show a steady decline (more than 40% since 2005), principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. National building standards for new development are improving but not to net zero standards and ignore other elements like embodied carbon/energy. Whilst the Local Plan can set standards for carbon reduction in new buildings (and the existing Plan does this), it has limited powers in other respects, for instance, driving the retro-fit of existing homes (e.g. via energy efficiency measures). Greater energy efficiency and renewable energy requirements can also conflict with other priorities, such as providing affordable homes owing to viability issues. Regardless of new development, there will be an ongoing need for significant retro-fitting of existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales. The city's Net Zero Carbon Action Plan identifies the key steps/milestones that need to be met to secure net zero by 2040 and the Zero Carbon Oxford Partnership aims to drive this through various initiatives (Local Plan is only one part of the response).
2.Resilience to climate change	--	-	A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. This risk is likely to increase with climate change. A flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Given constraints on development in Oxford, there could be increased pressure to locate development in areas of higher flood risk or upon areas of existing flood storage. Local Plan 2036 has strong policies on flood risk, as does NPPF, but residual risk can remain an issue for new development in at risk areas. Oxfordshire County Council has undertaken a Climate Risk assessment for Oxfordshire: alongside flooding it identifies overheating as an increasing risk, particularly if future global climate change targets are missed. Updated national building standards have incorporated limited requirements to consider overheating in new buildings but resilience building to this risk, as well as flooding from various sources, will need to be achieved through a variety of responses: Local Plan policies are one tool in the longer term, but other actions will also be needed.
3.Efficient use of land	**0**	**0**	Increased housing pressure means that there will be even more pressure on undeveloped land including green spaces which are important for

			sustainable communities and biodiversity. Without a new plan, housing may be developed in less sustainable locations. Without policies to prioritise delivery of new homes, many sites are far more likely to come forward for commercial uses (in less suitable locations). Development density and protection of undeveloped land have been good to date. Protection of undeveloped land should have supported the protection of soil in parts of the city, although it is likely that soil quality in other areas could be impacted by urbanisation. The higher costs associated with dealing with any remaining contaminated sites could affect viability and increase pressure to develop greenfield sites. Oxford has a number of locations with peat-rich soil deposits which are particularly valuable as important storage for carbon (carbon sinks), managing/storing water, and also for retaining archaeological deposits. Historic development has likely removed some wider deposits, and there are also potentially unmapped/unknown deposits still present in areas. Current Plan protects some of the key areas of known deposits (as protected open space), but there is potential for additional losses of unrecorded deposits to development in future without additional mitigation.
4.Local housing needs Need and supply	**--**	**--**	The government's proposed standard method (published December 2024) annual housing need is set at 1,087 per annum (21,740 for the 20 year plan period). The Strategic Housing Land Availability Assessment indicates that there is not enough capacity within Oxford to meet all of the housing need. Some of Oxford's housing needs may therefore need to be met outside the city. Without additional large-scale development sites, the proportion of homes delivered through small infill sites is likely to increase, and could increase pressure on the existing infrastructure owing to the incremental nature of these proposals, without them delivering new on-site infrastructure. There is also limited opportunity to deliver affordable housing from these smaller developments.
Affordable housing	**--**	**--**	House prices in Oxford are already very high, and future prices are likely to continue to rise more quickly than average salaries. Housing to rent on the open market is also unaffordable to a significant proportion of people. So, delivering affordable housing is also a priority for the Plan, particularly for those in greatest levels of need (social rent homes). The annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme. However, national policy provides challenges, for example, reducing the number of sites from which contributions can be sought towards affordable housing to those of 10 or more units, and allowing affordable housing models which are still not affordable in the Oxford context.
Students and student accommodation	**0**	**0**	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5.Inequalities and health Inequality	**-**	--	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health. These are being exacerbated by the cost of living crisis.

			Continued action needs to be taken to address these inequalities to enable all parts of Oxford's communities to experience a good quality of life. For example, the health of Oxford's residents is generally good, but there is great variation: for instance, men in wealthier parts of the city live more than 13 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Inequalities are likely to exacerbate the future risks to health and wellbeing caused by climate change, particularly overheating and flooding. Oxford is already at higher risk to overheating because of the level of urbanisation compared with other parts of the county and this will continue in future according to 2050 projections without appropriate resilience measures.
General health	+	+	Despite more localised inequalities, Oxford residents' general health is good and the higher-than-average levels of activity and healthy weight need to be maintained and increased. The Local Plan can help to address wellbeing and mental health by improving housing quality, access to open spaces and building communities. There is some national research that indicates national picture of population health is deteriorating, although consequences for Oxford's population specifically are unclear. See also analysis against 'inequality' above.
Health and housing	-	--	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits are delivered. See also analysis against 'inequality' above.
6.Services, facilities and infrastructure Community facilities	0	-	Availability of services and facilities plays a key role in quality of life and Oxford's compact nature means there are many areas which benefit from good access to daily needs, however this is not universal across city. The pandemic highlighted the value people put on facilities in their local areas. With an increase in population, it will become even more important to protect and enhance these facilities, and ensure that they are easy to access by walking, cycling and public transport. Economic shocks like the pandemic and other factors including rising costs of energy and living in general continue to put pressure on services, community and cultural facilities however. Changes to use class order such as the introduction of use class E make it harder to protect particular services/facilities through local planning policy.
'Grey' infrastructure	-	-	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon. Transport is covered under 8. (Traffic and air pollution). Water is covered further under 9. (Water). The improvements needed to address many of the grey infrastructure issues are somewhat outside of the Local Plan's control. They rely upon investment and infrastructure upgrades by others with primary responsibility for the infrastructure, such as the utilities providers, with

			the Council acting in a enabling/supporting role helping to ensure plans are appropriate for scales of growth expected.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7.Green infrastructure and leisure	++	+	Oxford has a wide range of green spaces which are generally of good quality although unevenly distributed. However, as Oxford's population increases, there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. Limited development opportunities are likely to mean an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features. It is unlikely that new large public open spaces will be created with or without a Plan, although smaller spaces could be, and existing open spaces can be enhanced. In addition, any green space (unless it can be show to be surplus) lost to development has to be replaced elsewhere in the city. Green spaces will need to respond to climate change, providing long term flood protection and adaptable habitats, as well as other to impacts from surrounding urbanisation like pollution (e.g. water, air).
8.Traffic and air pollution Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at various major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. The Oxfordshire authorities are focusing on active travel, improving walking and cycling infrastructure and public transport, and restricting cars e.g. through low traffic neighbourhoods, traffic filters, work place parking levy, extending the area of the zero emission zones and supporting the introduction of non ICE bus fleets. These actions should potentially benefit air quality as well as congestion. The national phasing out of petrol/diesel cars will help to improve air quality.
Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9.Water Water resources	-	--	Oxford is in an area of serious water stress and the current Local Plan sets water use limits on new development in line with Building regs for this reason. Water resources are currently adequate but may not be by 2045 due to challenges like climate change and increased demand for water from a growing population. Beyond any Local Plan, Thames Water have various interventions planned as part of a strategy covering the next 50 years to address water supply deficits through their Water Resources Management Plan (2024), including proposing a large new reservoir at Abingdon.

			There are various ecological sites in the city which are sensitive to changes in hydrology (water flows and water quality). The Local Plan 2036 sets policies which ensure development considers and addresses potential impacts and these would remain relevant in the absence of a new Plan.
Water quality	-	?	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence (e.g. agricultural practices and invasive species). Other causes have a more direct relationship to development, for instance, run-off from increased development could worsen this. The extant Local Plan cover city to 2036 and includes policies that help address water quality such as SuDS to address run off. Addressing existing capacity problems at the wastewater treatment plant which serves housing in the city is considered to be the key intervention needed to support improvements in water quality. Thames Water are in the process of implementing an upgrade scheme which should address capacity concerns for the Sewage Treatment Works, and as this come online in future, the situation is likely to improve for water quality in the city.
10.Biodiversity	**-**	**0**	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally (irrespective of the Local Plan) and superseding existing biodiversity net gain policy in Local Plan 2036. The County Council has published a Local Nature Recovery Strategy which identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue to put pressure on biodiversity more broadly.
Nature conservation areas	**+**	**0**	Nature conservation areas such as Oxford Meadows SAC are currently relatively well protected, and policies in the extant Plan protect all green spaces identified as being of high biodiversity value at a local, regional or national level. This would remain the case to 2036, after which national policy would apply. Designated sites like the SAC and SSSIs benefit from national protection, however the absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).
11.Urban design and historic environment	**++**	**+**	Oxford has a high-quality landscape and historic environment. Various national protections for designated historic assets (e.g. listed buildings) and non-designated local assets will continue under current Local Plan. High levels of development and tourism continue to put a strain on natural and historic sites and Oxford's landscape and townscape.
12.Employment and economy Employment	**++**	**++**	Oxford has a very strong economy, with high employment, low unemployment and high Gross Value Added. Oxford is a fast growing, innovative city that delivers significant economic growth. There is strong demand for research and development uses, which needs to be supported as a key sector of Oxford's economy and a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.
Unemployment	**++**	**++**	Future employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people. Also, see analysis against 'employment' above.

Education, skills and employability/ training	+	?	Oxford Economic Strategy includes a vision to deliver a more 'inclusive economy.' The city includes areas amongst the most deprived in UK. Oxford's population overall is highly skilled, but there are parts of the city where the local population is classified within the 10% most deprived for educational skills and training in the country. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Skills mismatches increase in-commuting, exacerbating congestion problems. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	0	0	It is unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

3.25 Even without the Oxford Local Plan 2045, the analysis in Table 3.1 indicates that there will be some improvements in performance against certain sustainability indicators for the city in future due to factors outside of the Local Plan's direct influence such as national legislation and shifting technologies on the market. For example, the Biodiversity Net Gain requirements of the Environment Act, alongside the opportunities identification of the Local Nature Recovery Strategy may help to support new spaces for flora and fauna. Tightened building regulations bringing about improvements in energy efficiency and the ongoing decarbonisation of grid energy will go some way to reducing carbon emissions. Meanwhile, the policies of the Local Plan 2036 will remain in effect, securing various sustainability benefits from new development coming forward in the intervening period.

3.26 There will likely also be reductions in the performance of the city against some sustainability indicators without a new Local Plan, such as increasing pressures on land including green spaces or areas of flood storage, as well as pressure from new development on the setting of existing assets like historic buildings which contribute to the character of the city. The impacts of climate change are a factor which will have various effects such as increased stress on water resources, and increasing health risks from hotter summers. Whilst the city's economy is buoyant and expected to continue to generate employment opportunities, there is a risk that those with less skills or experience could be left behind where these opportunities are skewed towards higher skilled sectors; meanwhile, uncertainty and cost of living challenges could impact upon provision of services and other facilities for local residents.

3.27 The Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development which now allow, for instance, offices to be turned into housing. It also preceded the creation of the new Oxford Growth Commission as part of the government's new plans for the Oxford-Cambridge Growth Corridor; the city's declaration of a climate emergency and subsequent signing of a net zero carbon target of 2040. Meanwhile, there are ongoing challenges such as the continued housing crisis, the changing picture of retail, and impacts of pollution on the environment from various activities which have not been resolved. A new Local Plan offers the opportunity to respond to these changes and ongoing challenges.

3.2.2 Existing problems at areas of particular environmental importance

3.28 Also of relevance to the current sustainability context of the city, the SEA process requires an analysis of existing problems at areas of particular environmental importance, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). SPAs and SACs are internationally important nature conservation sites designated for, respectively, birds and habitats/species. This section also discusses the city's Sites of Special Scientific Importance which are nationally designated areas of importance in the city.

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

Oxford Meadows SAC - is a 267ha site, part of which lies within the city boundary. It is designated because of its lowland hay meadow and creeping marshwort *Apium repens*. In December 2015, the last year of analysis of Oxford Meadows, it had excellent overall ('global') value for its hay meadow and creeping marshwort. However, it is highly threatened by human induced changes in hydraulic conditions, pollution to surface water and invasive non-native species. Previous HRA work and discussions with Natural England have also flagged concerns about air quality impacts arising from traffic emissions and recreational disturbance.

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

Little Wittenham SAC - is a 69ha site located 19km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In December 2015, the last year of analysis of Little Wittenham, the great crested newt population was assessed as being of good overall ('global') value, but it is highly threatened by non-native invasive species.

3.30 Additionally, Oxford also has a number of Sites of Special Scientific Importance (SSSIs) as is shown at Table 3.2 and Figure 3.1. Of those SSSIs within, or partially within the city, they are of varying condition, with the majority being in favourable condition, but two in unfavourable condition (Hook Meadow and the Trap Grounds SSSI, and Littlemore Railway Cutting SSSI) and three in partial unfavourable condition (Brasenose Wood and Shotover Hill SSSI, Iffley Meadows SSSI, and Lye Valley SSSI). The information on SSSI condition is normally 5-10 years old, so their condition may have changed since it was assessed. The table includes links to the summary information for each site on Natural England's Designated Sites viewer website.

Figure 3.1: Locations of Sites of Special Scientific Interest (SSSIs) within and around Oxford and their condition, (source: DEFRA MAGIC website)

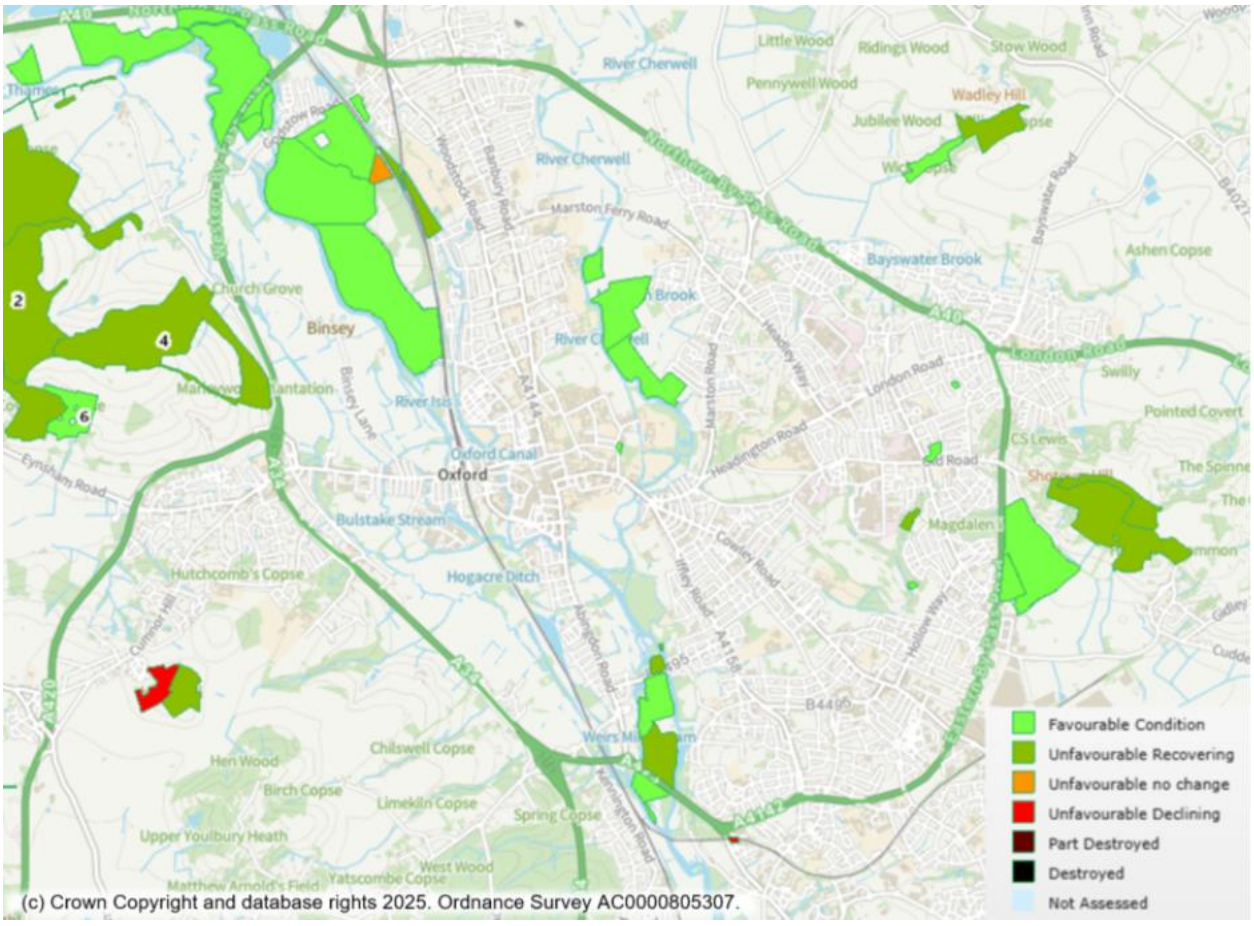

Table 3.2: Additional details relating to Sites of Special Scientific Interest (SSSIs) within Oxford or nearby

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting (Geological SSSI)	0.50ha	Yes	100.00% Unfavourable – no change
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove (Geological SSSI)	0.43ha	Yes	100.00% Favourable
Magdalen Quarry (Geological SSSI)	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable
Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge (Geological SSSI)	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

3.31 As can be seen above, the areas of particular environmental importance in and around the city are in varying condition and subject to various ongoing threats. Some of these threats can be more directly influenced by the Local Plan and the planning system than others.

3.3 Identify key sustainability issues and problems (Sustainability Appraisal Task A3)

3.32 The policy context of Task A1 and sustainability context of Task A2, as was presented in the previous sections and accompanying Background Papers, identified a range of issues and problems of relevance to the development of the Oxford Local Plan 2045. This section now takes forward and identifies the key sustainability issues and problems that the Council will need to be aware of and respond to where possible in line with Task A3 of the SA process. It is an important step in helping to narrow down the focus of the Local Plan 2045 as well as the accompanying SA/SEA process informing the Plan's development.

3.33 Table 3.3 draws together the key issues and problems which were highlighted in the previous sections and the background papers that support the SA.

Table 3.3: Key sustainability issues and problems for the Oxford Local Plan 2045

SA objective	Sustainability issues and problems
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Oxford is still very far away from achieving its 2040 target of net zero emissions and Local Plan cannot deliver it alone. • Retrofitting existing developments will be a significant challenge but critical to helping meet local and national net zero targets. • New development must not further contribute to climate change or the existing retro-fit burden in the city. • Policy needs to target energy efficiency and embed the energy hierarchy into the design of new buildings (fabric first, reducing energy use, mitigating remaining emissions). • Embodied carbon is an ongoing challenge to be addressed as part of the construction process although it is a complex and multi-faceted issue. • There is potential for supporting more renewable energy generation across city through greater uptake of micro-renewables in new development and on existing rooftops, although capacity elsewhere (e.g. for larger installations) is uncertain due to the many constraints on land.

2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. The Oxford Flood Alleviation Scheme is expected to reduce flood risk for a number of existing properties and infrastructure. • There will be residual risks of flooding after applying the sequential approach to locating development and incorporating defence measures. • Overheating is a prominent and increasing risk in the city, particularly more urban areas. Overheating risk is exacerbated in areas with reduced green infrastructure as well as higher levels of deprivation or poor quality buildings. • The Local Plan 2045 will need to take long term flood risk and overheating into account, including the impacts of climate change and how this could change the pattern and severity of these risks in the city. • New development should not exacerbate flood risk or overheating, such as through excessive use of hard surfaces increasing surface run off into sewers, or exacerbating the urban heat island effect. • There are links between flooding/overheating and human health (physical and mental), particularly in areas of the city that are most deprived or highly urbanised/lacking in green infrastructure.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• The plan must aim to use suitable brownfield sites and other underutilised land as a preferred option for development. • An increase in minimum housing density should be considered where a sufficient level of infrastructure is present. • Prioritising brownfield land for development may reduce opportunities to repurpose the sites for public amenity or as green infrastructure with a focus on ecological/biodiversity functions. • The cost of developing contaminated sites is likely to be higher than developing elsewhere. In turn, these higher costs increase pressure to develop greenfield sites. • Soils are at risk from pollution arising from new development as well as degradation from development/construction processes, this includes limited carbon-rich peat reserves that have already been degraded by historic development in the city. • The City Council should only release land from the Green Belt or alter the boundary where exceptional circumstances are fully evidenced and justified.

	• The plan should consider a more comprehensive approach to Oxford's Green Belt and whether any part of it is now designated as 'grey belt' as defined in the updated NPPF (December 2024).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing costs in Oxford are very high, land available for housing is very limited, and affordable housing has historically been difficult to provide. • Oxford has limited capacity to deliver new homes within its boundary and has been unable to meet housing need in full without support from neighbouring authorities. • A continued reliance on smaller sites is likely to increase pressure on existing infrastructure. • The type of affordable housing delivered in Oxford is likely to be impacted upon by changes made through national policy, i.e., requirements for First Homes. • The Plan should assess and respond to the need for student housing: The links between provision of student housing and other types of housing should be considered when developing policies. • The potential implications of student housing in different locations, for students, neighbourhoods and in terms of delivering sufficient housing of the right type should be considered.
5. To reduce poverty, social exclusion, and health **inequalities**.	• Oxford has high levels of health inequalities across the city. • Covid and the ongoing cost of living crisis have exacerbated inequalities and harmed health for many. • Oxford's higher-than-average levels of activity and lower-than-average levels of obesity need to be maintained and improved. • The Local Plan can help to improve mental health and wellbeing through, for instance, improving quality of housing, improving access to open spaces, and focusing on building communities, particularly learning from the coronavirus pandemic. • Climate resilience measures will be essential for reducing impacts on health and wellbeing as the city moves towards a net zero future, particularly for the most vulnerable communities.
6. To provide accessible essential **services and facilities**.	• Economic shocks impacting cost of living and generating higher energy prices is likely putting strain on community and cultural facilities. Protection of facilities may become more difficult, given changes to government policy on permitted development. • With high pressure for housing, it will be important to make a case for the importance of the facilities that support this housing. The plan will need to meet the

	infrastructure needs of additional development in the city over the Local Plan period. • New infrastructure must address the climate emergency (low carbon, climate resilient). Natural solutions will be important in ensuring the resilience of infrastructure. • Infrastructure needs to help people to live healthy, active lives (e.g. walking/cycling, GP surgeries). • The city generally and its infrastructure should be adaptable to future changes in technology. • The retail and service sector plays a crucial role in Oxford's economy, providing job and leisure opportunities to local people. The city must offer a diverse range of retail uses and services, ideally in accessible locations.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• Unequal access to, and distribution of, green infrastructure across the city exacerbate wider health inequalities. There are priority areas which would benefit particularly from increased greening. • Infill development within the city, particularly on garden land, can reduce green infrastructure coverage which would otherwise provide natural benefits like water storage and habitat for wildlife. • Increased recreational pressure arising from population growth and visitors to the city puts pressure on open spaces including playing pitches which are important for health and wellbeing of residents, particularly those without gardens. • Climate change and impacts from development such as on water quality (e.g. run-off from roads etc.) puts pressure on existing green infrastructure and biodiversity. • Very limited opportunities to create large areas of new public open space.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Although Oxford is known for its high levels of walking, cycling and public transport use, Oxford's roads are still congested, with high levels of commuting by car. • All of Oxford is an Air Quality Management Area because of NOx, which mostly comes from vehicles. Tackling emissions from domestic and nondomestic sources is likely to improve air quality. • Past transport policy has focused on carrots: improving facilities for walking, cycling and public transport. However current policy is also to discourage car use, for instance through restricted parking, zero emission zones, and reallocation of some road space to sustainable forms of transport.

	• Restrictions in car use in the city must be supported via a strong and affordable public transport infrastructure network. • Improvements in electric transport provision and the restriction of cars in the city centre will help to achieve a zero carbon Oxford. The uptake of low/zero emission vehicles should be encouraged, in particular buses and taxis which will continue to need to access the city centre. • Improvements to cycling and walking infrastructure must be inclusive and the benefits shared by all of Oxford's residents. • Improved public transport connections between the city and surrounding areas will improve the integration of settlements throughout Oxfordshire
9. To achieve **water** quality targets and manage water resources.	• Oxford is already in an area of serious water stress. Climate change, particularly incidences of hotter, drier summers may exacerbate water supply issues and create increased water shortages. • Increased demand for water is likely to put more pressure on water resources. Additional water efficiency measures will need to be investigated through the plan-making process. • There are known water quality issues in local watercourses arising from a variety of sources. Nutrients from wastewater could further impact these local water bodies. Pollutants can also arise from other sources, like road runoff. This may have knock on implications in terms of the Water Environment Regulations, and the city's ambitions for bathing water status for parts of the River Thames. • Capacity upgrades are needed for the wastewater treatment works that services the city, Thames Water are working on plans to undertake these works but these plans are still emerging and will take time to complete. • There are various ecological sites in the city which are sensitive to changes in underlying hydrology that supports these areas (both changes in water flows and water quality), which new development may need to consider depending on location.
10. To conserve and enhance Oxford's **biodiversity**.	• The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure, changes to the hydrological regime as well as invasive species. • Two SSSIs out of the twelve in the city are in unfavourable condition and three are partly in unfavourable condition.

	• Development pressure on, or near to protected sites could result in direct loss of habitat or species, fragmentation of ecological networks, as well as indirect impacts e.g. from noise, light, air pollution. • Climate change is likely to impact habitats and species distribution. • Off-site areas for biodiversity net gain stemming from development will probably be needed in response to the Environment Act. • The County are preparing a Local Nature Recovery Strategy, a key requirement arising from the Environment Act. This document should identify opportunity areas for biodiversity enhancement in the city and wider county (including offsite BNG), although there may be other opportunity areas. The LNRS does not assign additional protection nor mandate enhancements itself.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Oxford is a historic city, characterised by an abundance of designated and non-designated heritage assets which form an important part of the city's character. • Potential heritage impacts of new development proposed in the plan should be considered and assessed where necessary, both in terms of any direct physical impacts and impacts on setting. • Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character. • Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city. • Green spaces and features should be woven into the urban fabric. • Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets, which will require a Whole Building Approach to any retro-fit measures. • Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and	• Employment in the city remains high and likely to continue growing; • The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing.

knowledge- based economy and the culture/leisure/ visitor sector.	Some employers have reported difficulties attracting and retaining staff because of these issues; • It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs; • The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites; • A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner; • Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D; • Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people; • State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages; • Some changes were accelerated by the pandemic. For instance, due to the increase in on-line retail, the make-up of the city and district centres are seeing a shift in their make-up. Once dominated by retail, other uses, such as employment and educational uses are bringing footfall and vitality and these important centres. Examples of non-retail opportunities that are emerging in city centres include co-working spaces, R&D and more; • Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city; • Small scale brownfield development across the city is more likely to put pressure on existing school places and will not in itself provide new school sites.

3.34 Table 3.3 has brought together the key issues and problems identified across the SA scoping work and the accompanying Background Papers. It highlights a range of challenges facing the city in relation to different aspects of sustainability which the new Local Plan will need to try to respond to. The analysis not only helps to frame the vision and

objectives for the new Local Plan but also helps in informing the assessment framework that should be utilised to appraise the emerging policy framework and its impacts on the city and wider environment.

3.4 Develop the SA framework (Sustainability Appraisal Task A4)

3.35 An SA/SEA Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. The analysis undertaken in the previous sections of this report, and fulfilling tasks A1 to A3 of the SA process stage A, helps to formulate the specific SA/SEA Framework that should be used for the Local Plan 2045, ensuring that it is tailored to the local context of Oxford. The development of the Framework is discussed in this section.

3.36 Development of the Oxford Local Plan 2045 will involve two types of decisions:

- on the plan objectives, alternatives and policies (general directions for the plan); and
- on sites (specific locations for development).

3.37 Assessing the impacts of the plan objectives, alternatives and policies involves a more general analysis against an overall framework of SA objectives. Assessing the impacts of sites involves analysing the site's location and future ability to support sustainable development. As such, two different appraisal frameworks have been used, which are discussed in turn in the following sub-sections.

3.4.1 The SA framework for plan objectives, alternatives and policies

3.38 The SA Framework of Table 3.4 consists of SA objectives and issues and is what will be used to assess the impacts of the plan objectives, alternatives and policies. The SA objectives provide a method by which to test whether the Local Plan will yield the best possible outcomes in terms of sustainability—its environmental, social and economic effects. The SA objectives therefore cover a full cross-section of sustainability issues. The objectives and the issues covered have been informed by the analysis undertaken in the previous tasks (particularly the key issues/problems identified under Task A3/Section 3.3).

Table 3.4: SA/SEA framework for plan objectives, alternatives and policies

SA Objective	Issues covered	SEA Themes
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Building standards and energy efficiency • Renewable energy generation • Active travel and public transport	Climatic Factors, Air

	• Waste reduction • Sustainable construction practices including addressing embodied carbon	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• Flooding • Resilient and adaptable building design and layout • Overheating	Water, Climatic Factors
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• Building densities and layout • Greenfield versus Brownfield land • Green belt and grey belt? • General biodiversity and designated sites • Soils including peat reserves. • Land contamination	Soil, Material Assets, Biodiversity
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing numbers • Housing size/mix • Affordable housing • Specialist accommodation (e.g. care homes, gypsies/travelers) • Student accommodation	Material Assets, Population, Human Health
5. To reduce poverty, social exclusion, and health **inequalities**.	• Regeneration • Geographical spread of new development • Accessibility for areas of deprivation • Availability of services/infrastructure in areas of deprivation • Improving health and wellbeing and reducing health inequalities	Population, Human Health, Material Assets
6. To provide accessible essential **services and facilities**.	• Daily needs met within a short walk/cycle ride • Thriving city/local centres • Retail/shops provision • Community facilities, health care/GP, schools • Facilities for children/young people inc. play areas • 'Grey' infrastructure e.g. wastewater treatment, transport, energy.	Material Assets, Human Health
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• A network of green and blue infrastructure • Leisure facilities • Playing fields and public open space • Distribution/location as well as quantity of typologies of green infrastructure (inc the above)	Landscape, Biodiversity, Human Health,
8. To reduce **traffic and associated air pollution** by improving travel	• Promoting active travel – walking/cycling etc. • Reducing reliance on the private car	Air, Climatic Factors

choice, shortening journeys and reducing the need to travel by car/ lorry.	• Public transport incl. Train station and branch line • Commuting and housing/jobs balance • Parking • Electric vehicle charging points, zero emission zones • Addressing poor air quality and links to transport	
9. To achieve **water** quality targets and manage water resources.	• Water use and water resources • Improving water quality and avoiding further deterioration • SUDS, buffers on streams etc.	Water, Biodiversity
10. To conserve and enhance Oxford's **biodiversity**.	• Habitat Regulations Assessment inc. Air quality and recreational disturbance • SAC, SSSIs, local nature designations • Biodiversity more generally (e.g. wildlife friendly measures and habitat features) • Biodiversity Net Gain (BNG)	Flora, fauna, biodiversity
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Designated assets incl. Listed Buildings, scheduled monuments, Registered Parks & Gardens and Conservation areas • Non-designated assets, particularly those of local importance • Archaeology • Setting/curtilage • High quality urban design • View cones • High buildings	Cultural Heritage, Landscape
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Jobs incl. Knowledge-based jobs • Visitor economy • Locations for start-up ventures • Jobs for local unskilled/underskilled residents, apprenticeships • Keeping high streets alive amist changing shopping habits, changes to permitted development etc. • Cultural provision and tourism	Population, Material Assets

3.39 The SEA process requires the Environmental Report to include information on the likely significant effects on a specified list of environmental factors. Table 3.5 shows how the SA Objectives relate to these factors.

Table 3.5: Links between SEA Directive issues and SA objectives

SEA Directive issue	**SA objectives**

Biodiversity	3, 7, 9, 10
Population	4, 5, 12
Human health	4, 5, 6, 7
Flora	10
Fauna	10
Soil	3,
Water	2, 9
Air	1, 8
Climatic factors	1, 2, 8,
Material assets	3, 4, 5, 6, 12
Cultural heritage (including architectural and archaeological heritage)	11
Landscape	7, 11

3.4.2 The SA framework for sites

3.40 More site-specific appraisal criteria will be used to assess the impact of proposed development sites. Many of these relate to the location of the site, which is a key determinant of its sustainability, e.g. how easily would users of the site be able to access a range of facilities (more sustainable)? How close is the site to sensitive environmental areas (less sustainable)?

3.41 The same colour/symbol coding will be used as for policy appraisal (see Table 2.4), however there may be instances where an additional colour/code will be used to score a particular criterion where the ultimate score will depend upon implementation of the particular design of a proposed scheme. The site-specific criteria is listed below under each SA objective.

- **SA objective 1.** To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

  See SA Objective 8 for decision-making criteria.

- **SA objective 2**. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

  Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Table 3.6: Sites sustainability appraisal scoring criteria for SA objective 2

Category	Flood zones
--	Site is partially or wholly in Flood Zone 3b
-	Site is partially or wholly in Flood Zone 3a or Zone 2
0	Site is in Flood Zone 1

Category	Flooding of land surrounding site for access/ egress
--	There is no safe access/egress to/from the site
-	Access/egress from the site is over moderate to low hazard land
0	There is safe access/egress from the site – area surrounding site is FZ1

- **SA objective 3.** To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

  Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Table 3.7: Sites sustainability appraisal scoring criteria for SA objective 3

Category	Previously developed land
--	Site is protected open space
-	Site is unprotected open space
0	Site is previously developed land (with buildings in use on site)
+	Site is previously developed land (with vacant buildings on site)
++	Site is previously developed land (cleared)
Category	**Green Belt**
--	Site is on Green Belt land
0	Site is not on Green Belt land

- **SA objective 4.** To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

  Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Table 3.8: Sites sustainability appraisal scoring criteria for SA objective 4

Category	Housing provision
-	Site would decrease the amount of net new housing
0	Site would provide no net new housing
+	Site would provide up to 10 new homes
++	Site would provide more than 10 new homes
I	Depends on implementation
Category	**Affordable Housing provision**
-	Site is allocated for housing but would provide no affordable housing
0	Site is allocated for use other than housing or is not allocated
+	Site provides up to 40% affordable housing
++	Site provides 40% or more than 50% affordable housing
I	Depends on implementation

- **SA objective 5.** To reduce poverty, social exclusion, and health **inequalities**.

  Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Table 3.9: Sites sustainability appraisal scoring criteria for SA objective 5

Category	Regeneration Areas
0	Site is not in or adjacent to a regeneration area
+	Site is adjacent to a regeneration area
++	Site is in a regeneration area

- **SA objective 6.** To provide accessible essential **services and facilities**.

  Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Table 3.10: Sites sustainability appraisal scoring criteria for SA objective 6

Category	Community facilities
-	Allocation leads to a decrease in community facilities
0	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation
+	Community facilities provided on site
++	Allocation leads to a significant increase in community facilities
I	Depends on implementation

- **SA objective 7.** To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

  Decision-making criteria: Will it increase the provision of public open space?

Table 3.11: Sites sustainability appraisal scoring criteria for SA objective 7

Category	Public open space
-	Allocation leads to a decrease in public open space
0	Site not allocated OR amount of public open space remains the same due to the allocation
+	Site allocated for housing – 10% public open space provided on site
++	Allocation leads to an increase in public open space greater than 10% of the total site area

- **SA objective 8.** To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

  Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Table 3.12: Sites sustainability appraisal scoring criteria for SA objective 8

Category	Sustainable transport links (bus stop)
-	> 400m from a bus stop
+	< 400m from a bus stop
Category	**Sustainable transport links (rail station)**
-	> 1600m from train station
0	1200-1600m from train station
+	800-1200m from train station
++	< 800m from train station
Category	**Primary Schools**
-	>800m from the nearest primary school with spaces
+	<800m from the nearest primary school with spaces
Category	**Secondary Schools**
-	>800m from the nearest secondary school with spaces
+	<800m from the nearest secondary school with spaces
Category	**GP Surgeries**
-	>800m from the nearest GP Surgery
+	<800m from the nearest GP Surgery
Category	**Post office**
-	>800m from the nearest post office
+	<800m from the nearest post office
Category	**Air Quality**
--	Site is within or adjacent to a local air quality monitoring hotspot
-	Site is within an Air Quality Management Area (AQMA)
0	Site is not within an AQMA

- **SA objective 9.** To achieve **water** quality targets and manage water resources.

  Decision-making criteria: Does the site contain, or is it near, a water body?

Table 3.13: Sites sustainability appraisal scoring criteria for SA objective 9

Category	Water

--	Site contains a water body (e.g. lake, pond, stream)
-	Site is within 30m of a water body
0	Site is not within 30m of a water body

- **SA objective 10**. To conserve and enhance Oxford's **biodiversity**.

  Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Table 3.14: Sites sustainability appraisal scoring criteria for SA objective 10

Category	Ecology and Biodiversity
--	Contains an internationally or nationally protected site: Oxford Meadows SAC or SSSI
-	Contains or is adjacent to a locally protected site. Within 100m of a nationally/ internationally designated site. Potential for legally protected species to be present
0	Within 100m of a locally protected site or 200m of an internationally/nationally protected site
+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity
++	Contains no nature conservation designations but has potential for significant nature conservation enhancement

- **SA objective 11.** To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

  Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Table 3.15: Sites sustainability appraisal scoring criteria for SA objective 11

Category	Archaeology
--	Site contains a nationally important archaeological site (such as a Scheduled Ancient Monument)
-	Site provides the setting to a nationally important archaeological site OR site has known archaeological sites or potential (e.g. close to 'Sites and Monument' symbol or in local area of archaeological importance)
0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Category	**Conservation Areas & Register of Parks and Gardens (RPG)**
--	Site lies in a conservation area or the site is on the RPG register
-	Site lies on the edge of a conservation area or of a site on the RPG register
0	Site is not in or on the edge of a conservation area or site on the RPG register

Category	Listed Buildings
--	Site contains a listed building
-	Site forms the setting of a listed building or contains a locally listed building
0	Site contains no identified historic building constraint
Category	**View Cones**
-	Site lies within a view cone
0	Site lies outside of a view cone
Category	**Historic Core Area**
-	Site lies within the City Council's locally designated Historic Core Area.
0	Site lies outside the City Council's locally designated Historic Core Area.

- **SA objective 12.** To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

  Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Table 3.16: Sites sustainability appraisal scoring criteria for SA objective 12

Category	Employment Opportunities in the knowledge-based economy
-	Site would mean loss of jobs or economic floorspace in knowledge-based economy
0	No change in number of jobs/economic floorspace in knowledge-based economy
+	Site would increase number of jobs or economic floorspace in knowledge-based economy
I	Depends on implementation
Category	**Diversifying the economy end employment opportunities**
-	Site would not support diversification of the employment base or provision of affordable workspace
0	No change in employment base or access to affordable workspaces
+	Site would support diversification of the employment base or provide affordable workspace
I	Depends on implementation

3.42 Figure 3.2 summarises the site-specific criteria and shows how these link with the SA objectives of Table 3.4.

Figure 3.2: Site assessment appraisal criteria versus SA objectives

Site assessment criteria	SA objectives											
	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
Flood zone		■										
Flood risk on land surrounding site		■										
Type of land (e.g. PDL, Green Belt)			■									
Housing provision inc. affordable housing				■								
Regeneration area					■							
Provision of community facilities						■						
Provision of public open space							■					
Sustainable transport links: bus stop	■							■				
Sustainable transport links: train station	■							■				
Distance to primary school	■							■				
Distance to secondary school	■							■				
Distance to GP surgery	■							■				
Distance to post office	■							■				
Air quality								■				
Water									■			
Ecology and Biodiversity										■		
Archaeology											■	
Conservation area, RPGs											■	
Listed buildings											■	
View cone											■	
Historic Core Area											■	
Employment opportunities												■

3.5 Previous consultation on the emerging Sustainability Appraisal (Sustainability Appraisal Task A5)

3.43 In advance of its Regulation 18 consultation, the Council sought to make an early version of its scoping study (incorporating Tasks A1 to A4) available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. The Interim Reg 18 SA report included summaries of comments received and the Council's responses, including how the scoping work was subsequently updated to reflect the feedback, and this has been reproduced in Appendix A for reference.

3.44 The interim SA report, including the updated scoping study, was published as part of the Regulation 18 consultation (from the 27th June to 8th August 2025). There was no additional specific feedback on the interim SA report from the consultation bodies,

although there was some feedback received from other stakeholders which is summarised in Table 3.17.

Table 3.17: Summary of feedback received on Regulation 18 Interim Sustainability Appraisal

Summary of comments received	Council's response
The assigned scores for housing options, especially for the City Council's preferred Option B, lack clear and transparent justification. Not evident why Option B consistently receives more positive scores than Options A or C in numerous instances. Appears to be based on incomplete assessment without considering the full sustainability impacts of unmet housing. The sustainability impacts of cross-boundary housing provision do not disappear at the border; they are displaced. These distributed impacts, particularly those associated with Option B's reliance on external provision, could be worse than those of Options A or C. For example, accommodating development across more dispersed areas, potentially distant from Oxford's public transport routes, is highly likely to lead to increased car dependency and significantly higher carbon emissions due to longer commuting distances.	The detailed commentary for the scoring of the option set was included in the appendix to the Reg 18 report, as it is in this Reg 19 SA report (see Appendix B). We have reviewed the scoring in light of these comments, and remain of the view that these represent a valid assessment of the sustainability impacts of the different options. While the assessment of cross boundary impacts does represent a part of the SA/ SEA process, when assessing the sustainability impacts of the plan, it is important that the core assessment focuses on the impacts of the strategy within the local authority administrative area. Any assessment of the cross-boundary implications of delivering homes outside of Oxford's administrative boundary would depend on where these homes would be delivered – this is not something that is within the City Council's procedural jurisdiction. The location of the new homes delivered outside city boundary (including those to meet Oxford's unmet housing need), is a matter for each partner authority to engage with in the production of their own plans. Nevertheless, we have sought to ensure that some commentary on potential cross-boundary implications is incorporated where relevant in the updated report.
The testing under SA Objective 3 focuses primarily on judgements related to densities and the loss of green space. However, it fails to explicitly evaluate the impact of the options on the Green Belt, despite the Green Belt being directly mentioned within the scope of SA Objective 3 itself. This is a significant omission.	We will look to ensure that the findings of the Green Belt assessment are incorporated into the SA report for transparency.
SA Objective 7's conclusions are based on the identical impacts of density and green spaces already assessed under SA Objective 3. This is unnecessary duplication of testing and analysis, which raises questions about the thoroughness and efficiency of the SA process. A robust and unbiased re-evaluation of the housing options should be undertaken.	The SA Framework provides the key SA indicators that are considered for each SA objective. There is naturally some cross over between the two objectives, but they are treated differently as each has a different scope/focus.
Oxford Wastewater Treatment Work is mentioned in the Sustainability Appraisal as important infrastructure. This is located within South Oxfordshire and facilitated by the adopted and emerging Plans of South Oxfordshire, but	Noted – Thames Water are leading on this project and they will be involving partners as appropriate.

South Oxfordshire District Council isn't mentioned as a partner to work with.	
Care needed not to make things too bureaucratic when it comes to housing development. The crisis is acute and builders should not be deterred from delivering.	The Sustainability Appraisal process is a tool that helps to inform the development of the Local Plan. It does not, in of itself, create any additional burden for developers when they come to making an application.
It seems quite thorough	Comment noted.
Needs more focus on Oxford to be green, blue, clean air, low car, big on public transport, litter free, with penalties for cars parked on curbs. Other similar comments including need for more community gardens with edible plants and food forests, as well as even greener developments (more trees for shade) and more solar panels on buildings.	The Sustainability Appraisal framework address these various considerations across several of its objectives (e.g. Objective 7 Green Infrastructure; Objective 8 Traffic and Air Pollution). As set out above, the SA's role is to help inform the development of the Local Plan, which in of itself has various policies across Chapter 4 and 7 which address different aspects of this comment where appropriate.
The sustainability appraisal has taken consideration on environmental conservation and health but is lacking educational inputs. These should cover diversity and inclusion, British culture, political systems, institutions, laws, community concepts, religions, ethnicities and local history regardless of where residents are from.	We will look to draw these considerations into the relevant underlying background papers where they are not already mentioned and where this would be of relevance to the Local Plan.
Sustainability appraisal is lacking proposals for making public transport viable and attractive.	The Sustainability Appraisal helps to inform the development of the Local Plan. The Local Plan includes a range of policies intended to support access to public transport.
A couple of comments flagging concern that report does not take sustainability seriously and that there is too much focus on growth without due concern for climate change, protecting environment, the health/needs of local residents.	A key role of the Local Plan, which the Sustainability Appraisal helps inform, is about guiding growth to happen in the right way for the city. Nevertheless, the Sustainability Appraisal framework which is used throughout the report includes objectives that address all three pillars of sustainability (the environmental, social and economic).
Comments on sustainability appraisal scores for particular sites in their interim site assessment forms.	The Council will be reviewing the sustainability appraisal scores for all the sites being taken forward to Regulation 19 and updated forms will be published alongside this report. Scores will be updated where appropriate.

4. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1)

4.1 Developing the Local Plan vision, themes and objectives

4.1 The Regulation 18 consultation included a vision for the city which was guiding the new Local Plan which had first emerged during the development of the withdrawn Local Plan 2040. Whilst it had already been subject to public engagement and feedback throughout the Local Plan 2040's preparation, it had been reviewed and modified in light of the scoping undertaken to inform the early work in developing the new Local Plan in 2025. Since that Regulation 18 consultation, the vision has been further reviewed and subject to a minor update to reflect the extended Local Plan period to 2045, but the Council proposes that this remains a strong and relevant guide for the new Local Plan's development. It is as follows:

In 2045 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare.

Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper.

The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air.

The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.

4.2 The vision for the Local Plan 2045 is underpinned by six themes which also emerged through the Local Plan 2040's early development. These six themes were adapted from the three pillars of sustainable development (Society, Environment and Economy) and the intersects between them.

4.3 In turn, each of the six themes are supported by a grouping of more specific Local Plan objectives. These objectives add greater detail to how the Local Plan will seek to deliver upon the themes and overarching vision, and more specifically respond to the

particular sustainability issues, as well as local, regional and national priorities which captured earlier in the report (see chapter 3).

4.4 In practice, there is overlap between the themes and the objectives, and these could ultimately be grouped in a variety of ways. Indeed, the specific objectives can be integral to multiple themes, and conversely, the themes are influenced by multiple objectives.

4.5 As with the vision, the Council has kept the scope of the themes and objectives under review throughout its work on the Local Plan 2045. This was important for determining whether these remained relevant or whether contextual changes since they had first been prepared, or following the summer 2025 Regulation 18 consultation, suggested amendments were needed. Whilst the six themes were considered to remain an effective and relevant framework through which to structure the new Local Plan, various modifications have been made to the underlying objectives since they were first conceived during Local Plan 2040's development. The six themes and the objectives of the Local Plan 2045 are presented in Table 4.1.

Table 4.1: The six Local Plan 2045 themes and underlying objectives

Local Plan 2045 theme	**Underlying Local Plan objectives** ***The Oxford Local Plan 2045 will...***
A healthy and inclusive city to live in.	• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible. • Provide access to affordable, high-quality and suitable accommodation for all.
A green and biodiverse city that is resilient to climate change.	• Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city.

	• Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
A liveable city with strong communities and opportunities for all.	• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city. • Develop thriving local centres that support a variety of uses and foster activity throughout the day and night. • Demonstrate we value diversity whilst fostering greater inclusivity within our communities. • Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.
A city that respects its heritage and fosters design of the highest quality.	• Ensure well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage. • Curate a built environment that supports and enables people to be physically and mentally healthy.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	• Ensure Oxford is ready for a net zero carbon future. • Ensure our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • Ensure the city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.

4.2 Testing the Local Plan themes and objectives

4.6 The six themes, including the underlying objectives that comprise them, are central to achieving the overall vision. As such, these have been assessed against the twelve Sustainability Appraisal objectives to identify where there is potential for positive/negative/neutral or uncertain impact and the results of that assessment are presented in Table 4.2.

Table 4.2: Appraisal of Local Plan 2045 themes against SA Objectives

Local Plan 2045 themes	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
A healthy and inclusive city to live in.	-	0	0	++	+	?	0	+/-	-	0	0	+?
A green and biodiverse city that is resilient to climate change.	0	++	+	-	+	+	++	0	+	++	0	+/-
A fair and prosperous city with a globally important role in learning, knowledge and innovation.	-	0	0	-?	+	0	0	-	0	0	0	++
A liveable city with strong communities and opportunities for all.	+	0	+	0	+?	++	0	+	0	0	0	+
A city that respects its heritage and fosters design of the highest quality.	+/-	+/-	0	-	+?	0	+?	0	0	+?	++	+/-
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.	++	0	?	0	+?	0	0	+	+	+	+/-	0

4.7 The assessment as set out in Table 4.2 identifies that, taken as a whole, the six themes address each of the 12 SA objectives with varying degrees of impact. There are a significant number of areas where the six themes represent positive or significant positive impacts in relation to the SA objectives and suggests that they are generally compatible. There are, however, elements of each of the themes which represent negative impacts with the SA objectives, or else less certain impacts and potentially suggest conflicts which may need to be managed. The rationale for the negative or uncertain scores is discussed in Table 4.3, this is followed by a short commentary on what the impacts mean for developing the Local Plan going forward.

Table 4.3: Rationale for negative or uncertain scoring of Local Plan 2045 themes/objectives against the 12 Sustainability Appraisal criteria as were presented in previous table.

A healthy and inclusive city to live in	• Negative impacts identified against SA criteria 1 and 9, because new housing required to help meet identified needs will represent additional carbon emissions and water demands, though this could be mitigated to some degree with appropriate design standards. • Some positive impacts for criterion 8 where new housing can reduce commuting for Oxford employees currently forced to live further afield, however, more residents could increase local congestion resulting in negatives. • Uncertain positive impact against criterion 12, as new housing may improve employers ability to retain staff, however, depends on implementation. • Uncertain impact against criterion 6, new housing may help residents locate closer to services, improving access, however, it may also increase pressure on existing services unless commensurate contributions are secured to mitigate these pressures, impact is less clear and depends on implementation again.
A green and biodiverse city that is resilient to climate change	• Some negative impact against criterion 4 because the additional constraints presented by protecting green networks is likely to reduce availability of sites for housing and could reduce capacity of sites in terms of amount of housing delivered. • Some positive and some negative impacts for criterion 12, in that incorporating green infrastructure and generally making space for nature can help to boost market values of various uses and may make city more attractive to employers, however, additional constraints presented by protecting green networks could reduce ability of employers to expand.
A fair and prosperous city with a globally important role in learning, knowledge and innovation	• Negative impact identified against SA criteria 1 and 8, because new employment in the city, without commensurate housing could lead to increased numbers of commuters into the city with associated carbon emissions (at least in short term until fossil fuel vehicles are phased out). Additional employment growth, particularly high energy demand uses, will likely have additional associated carbon emissions (e.g. if energy demand is not sourced renewably), though again this could be mitigated somewhat with appropriate design standards. • Uncertain negative impact against criterion 4, if additional employment generates more staff needing housing in the city, though depends on where staff are coming from (they may already be local).
A liveable city with strong communities and opportunities for all	• Uncertain positive impact against criterion 5, if improvements in accessibility to services and other facilities across the city can be secured, then this may help to reduce various health and economic inequalities amongst Oxford's communities, although it is highly dependent on how various policies and DM decisions are ultimately implemented.
A city that respects its	• Some positive and some negative impacts for criteria 1 and 2, in that high-quality design could help to secure reductions in carbon emissions and

heritage and fosters design of the highest quality	deliver climate adaptation. However, sensitivities around heritage assets may limit scope of the actions that can be taken in new development if it could impact these, or it may mean existing emissions/ climate vulnerabilities affecting heritage assets remain locked in. • Protecting existing heritage assets may help to preserve Oxford's special qualities which draw tourists yearly and support economy, however, heritage constraints may reduce scope of employment uses to expand, thus positive and negative impacts under criterion 12 also. • Uncertain positive impacts for criteria 5, 7 and 10, because high quality design could mean ensuring new development is designed to support health and wellbeing of occupants, and also respects existing green features/biodiversity or brings forward enhancements/net gains as part of design, but depends upon implementation. • Likely to be some negative impact for criterion 4 where existing heritage constraints might reduce capability to maximise capacity of sites for new housing.
A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon	• Some positive and some negative impacts for criterion 11, whereby net zero standards and need to mitigate impacts on wider environment from new development could drive more efficient design and higher quality development overall, however, some net zero design measures may not be compatible with existing traditional buildings or protected heritage assets, also the improved performance of buildings may reduce scope of design (functionality prioritised over beauty). • Uncertain positive impacts for criterion 5 because net zero design could help to reduce risks of occupants being exposed to fuel poverty, high energy bills, thus improving economic resilience. • Uncertain impact for criterion 3, whereby improved practices around use of soils might secure some positives on previously degraded soils, but often this will represent purely mitigation of impacts to stop further degradation, so unclear.

4.8 Of course, the six themes will work together as a whole, and identified positive or negative impacts in Table 4.2 do not consider the potential counterbalance in impacts that can occur under other themes. Areas of negative impact, as discussed in more detail above, do help to highlight areas where particular care will need to be taken around whether mitigation is needed. Equally, positive impacts identified can be considered as opportunities that the Council should seek to preserve.

4.9 The benefit of the testing is in helping to understand where there is potential for impacts that should be avoided or mitigated, if necessary, that may need to be explored further through the detail of the Local plan strategy and its policies, as is explored further in the next chapters.

5. Exploring options for the emerging Local Plan 2045 (Sustainability Appraisal Tasks B2 and B3)

5.1 Developing the growth strategy for Local Plan 2045

5.1 There is more than one way of trying to meet the needs of residents, workers and visitors to Oxford and achieving the various objectives that have been identified for the new Local Plan. Oxford is a constrained city and there is insufficient land to meet all of the city's development needs within its boundary, but from this starting point there are a range of alternative approaches to explore. At the heart of this is a need to explore ways of balancing housing and wider development needs with objectives which could constrain growth, including relating to protecting and enhancing Oxford's sensitive environment and many heritage assets.

5.1.1 Identifying reasonable alternatives for Local Plan growth strategy

5.2 Responding to key sustainability issues affecting the city, the Council considered a number of potential growth strategy options (collectively 'alternatives') for the Oxford Local Plan 2045. The chosen growth strategy involves striking a balance between providing for housing and employment land / floorspace (henceforth floorspace) needs whilst also delivering on wider plan objectives.

5.3 The primary focus under the Local Plan's chosen growth strategy is planning for new homes, responding to the significant pressure in the city for improving access to housing and addressing ongoing affordability issues. The government's standard method identifies the housing need for the city. However, the constrained nature of the city means that a capacity-based requirement is being planned for, i.e. the requirement is below Oxford's identified need.

5.4 This shortfall could be met by neighbouring local authorities, but there are risks and uncertainties with any such strategy, such that there was a need to explore higher growth options with a view to ensuring that the Council has left 'no stone unturned'.

5.5 With regards to employment floorspace, under the chosen growth strategy employment needs would be provided for almost in full, responding to the city's strong performing economy, particularly through a focus on intensifying and modernising key employment sites; however, some specific needs may not be met because land is prioritised for accommodating housing need. There is clearly market demand (as distinct from established need) to deliver a considerable further boost to employment floorspace,

at least in the short term; however, on the other hand, a lack of available housing for workers is a key barrier to the city's economic growth.

5.6 It is recognised that there is an argument to be made for boosting employment floorspace supply (over-and-above what would be planned for under the chosen growth strategy), such that this was also something to explore further through appraisal of (and consultation on) growth strategy alternatives.

5.7 In summary, in addition to appraising and consulting on the merits of the chosen growth strategy, there was a need to explore alternatives involving a boost to housing and/or employment.

Defining the alternatives in detail

5.8 Beginning with the chosen growth strategy which, as discussed, involves striking a careful balance, there is a need to distinguish between choices made at two spatial scales:

- City-wide – striking a balance means: A) supporting redevelopment of all available brownfield sites; and B) taking forward select greenfield sites, whilst also protecting a strong hierarchy of green and blue spaces that perform important functions like making space for biodiversity, flood resilience and physical/mental health.
- Site level – striking a balance means maximising capacity / development yields whilst also accommodating other features intrinsic to sustainable, healthy and well-designed places – like appropriate greening, open space, measures supporting active travel – and designing with onsite or nearby heritage and environmental assets in mind.

5.9 With regards to boosting supply, this might be achieved broadly by: A) boosting capacities at brownfield sites; or B) boosting greenfield supply from additional sites (though it should be noted that there is a very limited supply of additional greenfield sites without intrinsic constraints like flood plain, or national designation) and/or supporting increased capacities at greenfield sites.

5.10 As such, there are three broad alternatives:

1. The chosen growth strategy (striking a balance)
2. Boost brownfield supply (boost site capacities)
3. Boost greenfield supply (boost sites and/or site capacities)

5.11 With regards to (2) and (3), the aim would be to provide more fully for development needs and drive greater quantums/densities of development across available sites whilst reducing alignment with wider plan objectives. This could be achieved by:

- Minimising any locally set policy requirements that could restrict development capacity on sites, including expectations around environmental enhancements.
- Protecting only the open spaces that have intrinsic constraints on development, such as areas of flood plain, or nationally designated ecological or heritage sites, and limiting consideration of wider benefits that many of other spaces provide.

5.12 However, it is important to be clear that the above would only be within reason - significant negative environmental effects would need to continue to be avoided/mitigated. There will also be intrinsic constraints such as flood risk, nationally designated biodiversity and heritage, which make development in certain locations inappropriate.

5.13 Finally, there is the question of policy support for housing versus employment.

5.14 The chosen growth strategy, as discussed, can be described as an approach that is weighted towards supporting homes, which in practice means intervening to curb very high current market demand for employment floorspace, but there is also a need to consider the alternative of reduced policy support for housing / increased flexibility for employment.

5.15 What this means in practice is either:

- Prioritising housing – policy emphasis on bringing forward new housing sites and additional housing on existing sites; and resisting any net loss of housing and encouraging alternative uses to convert to (or incorporate an element of) housing where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then, seeking to meet employment land / floorspace needs through policies which focus primarily on protecting and intensifying only key existing employment sites.
- Prioritising employment – policy emphasis on driving the intensification and expansion of existing employment sites or delivering new employment sites; and resisting the net loss of employment floorspace and setting policies for the protection of a range of employment sites (sites of national, regional and local importance); also encouraging alternative uses (not residential) to convert to uses that can deliver more employment where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then seeking to provide for housing need through policies which focus on bringing forward new housing sites and additional housing on existing sites.

5.16 The above rationale led to six reasonable alternative growth strategy options , as are illustrated in the matrix in Table 5.1.

Table 5.1: Growth strategy alternatives considered for the Oxford Local Plan 2045.

	Balanced development	**Boost brownfield supply**	**Boost greenfield supply**
Prioritise housing	Option 1a (The chosen growth strategy)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

5.1.2 Testing the growth strategy alternatives

5.17 In order to explore the potential impacts arising from the growth strategy alternatives, these have been appraised against the 12 Sustainability Appraisal criteria using the same scoring mechanism as is used elsewhere in this report (see Table 2.4).

5.18 The detailed appraisal is set out in Table 5.2, followed by a concluding discussion.

Table 5.2: Detailed appraisal results for Local Plan growth strategy alternatives, including commentary explaining rationale.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
1. Carbon emissions	-	--	-	--	--	--	• Assume negative impact in terms of emissions under all scenarios because more development is likely to equate to more emissions. • Option 2a will result in more housing than option 1a/1b, however, may reduce in-commuting as more employees able to live closer to work. • Options 1b, 2b and 3b will result in more employment generated without commensurate housing and therefore more commuters into city, with associated additional transport emissions. • Option 3a could reduce commuting levels, but also brings in additional housing development than other options so similar level of impact to 3b and 2b.
2. Resilience to climate change	+	+	+/-	+/-	--	--	• Option 1a and 1b allow protection of a range of green spaces that help with reducing overheating and flood risk. They would also allow a balanced approach to the design of sites, fully utilising capacity for development, whilst also providing for range of greening and open space that helps resilience. • Option 2a and 2b would seek to fully maximise already developed sites, potentially able to protect a similar network of green spaces as under options 1a/1b. However, the minimal local standards that would facilitate maximising sheer quantity of development could reduce ability to deliver resilience measures like greening onsite. • Options 3a and 3b would potentially see development across a range of green spaces, impacting local resilience. Whilst the most high-risk spaces for flooding (e.g. floodplain) would not be developed, thus retaining some resilience, other spaces that still provide important resilience (e.g. slowing water run off and storing water, as well as urban cooling), could be lost.
3. Efficient use of land	+	+	+/-	+/-	--	--	• Options 1a and 1b perform best as development would be required to maximise capacity of sites whilst also delivering upon wider LP objectives,

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							coupled with protection of a network of greenfield sites and steering development to brownfield spaces first (though not ruling out lower quality green sites). • Option 3a and 3b are considered least efficient because of potential for loss of a range of green spaces including more valuable green spaces in the city. It is likely that more development of green sites will harm more areas of soil which have not already been impacted by development (another consideration under this objective). More potential greenfield sites for development could also reduce the pressure to maximise the efficient use of brownfield sites first. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which could impact efficiency in terms of meeting all objectives. • Options 2a and 2b are likely to have some positives and negatives. Though some greenfield sites would still be allocated under these scenarios, these options would encourage the maximising of previously developed sites in the city which is considered to be a very efficient use of land. However, as with options 3a and 3b above, there is potential that in the drive for maximising the quantums/density of development on brownfield sites at the cost of securing other measures on these sites, such as additional greening, open space, would lead to less efficient developments in the round. • A contrary view is that option 2a and 2b are most efficient for delivering highest densities of development on brownfield sites in the city whilst protecting greenfield land, so these could be scored higher if a view of efficiency was more solely focused just on this element of the issues covered under this criterion.
4. Local housing needs	+	+/-	+	-	++	-	• All options will provide some level of additional housing having a positive impact, though the housing focus of options 1a, 2a and 3a will have greater

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							positive impact and are likely to support greater provision for meeting housing needs of various groups (e.g. need for affordable housing). • Options 2a and 3a would each go further towards meeting a greater proportion of housing needs than 1a because they would seek to drive greater quantums/capacity of development whilst reducing other provisions on site (though still unlikely to meet need in full). Option 2a is not considered significant positive, as even maxing out development capacity on sites is unlikely to have potential to contribute any significant additional housing capacity as the sites are already quite constrained, although it would likely be somewhat higher than option 1a. • Option 1b, 2b and 3b would provide some housing, but the focus on delivering to meet employment need first is likely to then exacerbate existing housing need (generating more jobs and more people needing to places to live). This indicates a score that reflects some positives and negatives for option 1b. • Option 2b and 3b would also provide some housing, though the focus of using the additional capacity unlocked on brownfield (as under 2b) or greenfield sites (as under 3b) would firstly be for employment. Overall, the potentially greater levels of employment generated in the city under these options would exacerbate housing need further and outweigh positives, leading to minor negative impacts.
5. Inequalities	**?**	**?**	**?**	**?**	**?**	**?**	• The impact of the options on inequalities will depend heavily on implementation and is difficult to score at this level. It is likely that all options will make some contribution to elements of inequality, however, such as access to affordable housing or access to jobs skills. Specific impacts will depend on how particular applications come forward.
6. Services and facilities	**+/-**	**+**	**+/-**	**+**	**-**	**-**	• More housing, particularly on brownfield sites, under options 1a and 2a will mean more people can live in accessible locations that allow them to reach various daily needs via active travel. However, additional residents could

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							put strain on existing services if these are not enhanced or added to, or if existing facilities are allowed to be lost. • Additional growth in employment uses under option 1b, 2b and 3b could include uses that provide for daily needs of the local population which may therefore improve access—this will be slightly more positive under the brownfield focused options than greenfield, which could see some of these uses located in less accessible locations too (so may depend on implementation somewhat). The reduced population growth under these scenarios would still include some additional pressure, however, but less so than under housing focused scenarios. • Greenfield sites in the city are less likely to be located in accessible locations, though some areas will be more accessible than others. When this is combined with the more significant population growth associated with more housing accommodated across greenfield sites, this leads to a more negative impact under option 3a. The same accessibility concerns would impact the greenfield sites if employment instead came forward (as under option 3b) and could also mean employment generated away from existing employment clusters, although additional pressure on existing services from new housing may be reduced compared with scenario 3a. • There is, however, an element of uncertainty to these scores as it should be acknowledged that any viable sites may be able to deliver additional public benefits, including new community infrastructure.
7. Green infrastructure, leisure and recreation	**+**	**+**	**+/-**	**+/-**	**--**	**--**	• Options 1a and 1b have some positive benefits. The balanced approach to requiring development to maximise quantums/density whilst also delivering upon wider LP objectives will allow for development to incorporate a range of new green features (or protect existing features). This is coupled with protection of a network of greenfield sites (though not ruling out lower quality green sites) across the city which will contribute to a strong GI network.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							• Options 2a and 2b are unlikely to be able to secure as significant benefits on brownfield sites because they would sacrifice additional local standards for environmental enhancements like greening and open space in order to maximise development quantums/density. However, they would still allow for protection of a network of green infrastructure across the city (though some lower quality greenfield sites would be allocated). • Options 3a and 3b will be significantly negative because of potential for loss of a range of green spaces including more valuable green spaces in the city. A push to maximise quantums of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which leads to less efficient developments too.
8. Traffic and associated air pollution	**+/-**	**-**	**+/-**	**-**	**-**	**--**	• Under all options, it is assumed that air quality impacts will continue to reduce as vehicles shift away from fossil fuel burning, and wider county measures such as LTNs, expansion of the Zero Emissions Zone and electric bus fleet introduction take affect. However, emissions impacts will continue to some degree, particularly in earlier years of the Plan. • Option 1a, 2a and 3a would help to reduce the imbalance between those working in Oxford but being forced to live further afield and having to commute in for work, by providing more housing in the city (increasing levels for 2a and 3a). • However, under the same options, the associated increases in population associated with greater levels of housing could bring additional vehicles into the city (meaning some negative impact). Though private vehicle ownership may be tempered by reduced levels of parking provision that would be necessitated by low parking requirements, but also because maximising density of development of sites will mean trade off with space for parking. • Additionally, under option 3a, some of the greenfield housing sites coming forward for development are likely to be in less easily accessible locations

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							which may increase reliance on private vehicle ownership (pushing this option into predominantly a negative impact score). However, this negative might be reduced where there is a major focus on greenfield that can deliver sustainable transport improvements. • Options that focus on boosting employment/economic growth risk further exacerbating the imbalanced commuting patterns in the city, particularly where job creation is not matched with housing provision. The result is likely to mean more people travelling into city, some via private vehicles. This is likely to result in negative impacts under options 1b and 2b, and more significant negatives under 3b, due to it enabling greater expansion of employment floorspace as well as new sites in less accessible locations (including away from existing employment clusters).
9. Water	**+/-**	**+/-**	**-**	**-**	**--**	**-**	• For water, there is a need to consider both water resources/supply and water quality including impacts on wastewater infrastructure (although a scheme has been agreed with Thames Water to bring upgrades to the local wastewater treatment works to address existing capacity concerns and unlock future growth). • Options 1a and 1b would both generate housing, (more so under option 1a), and this will increase demand for water, as well as pressure on wastewater infrastructure. However, there will be greater opportunities to mitigate impacts from development on water quality because of the more balanced approach to design on sites. Some development capacity is afforded to environmental improvements like greening, open space, SUDs and buffers along watercourses. • Maximising the development quantums on brownfield sites not only increases amount of housing that can be delivered (with additional demands on water resources and wastewater treatment), but also minimises the environmental features that can mitigate impacts on water quality, leading to negative impacts under options 2a and 2b (2a is likely

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							slightly more negative than 2b in terms of impact on water resources/wastewater). • Option 3a and 3b have similar impacts as options 2a and 2b, however, the more expansive loss of greenfield sites across the city will have greater impacts on the water environment. For example, more urbanisation and loss of natural surface cover could exacerbate surface water run-off, leading to flooding and additional pollutants running into watercourses, though this may be mitigated somewhat depending on how SUDs are applied. However, the impact under 3a is more significant due to the additional amounts of housing that would come forward, with associated demands on water resources/wastewater.
10. Biodiversity	**0**	**0**	**0**	**0**	**-**	**-**	• Outside of the Local Plan's control, under all options, development will be expected to deliver the mandatory 10% Biodiversity Net Gain associated with the Environment Act, so there should generally be positive impacts in terms of habitat creation. However, the nature of many sites in Oxford is that BNG is likely to need to be delivered offsite. • The loss of greenfield sites under scenarios 3a and 3b is likely to lead to some additional fragmentation of habitats and wildlife corridors. On the assumption that some BNG will need to be delivered offsite, the limited opportunities to deliver locally in the wider city could be reduced further if greenfield sites are taken forward for development, meaning that this could be pushed further outside of Oxford. Allowing more development of greenfield sites would have additional negative impacts if this extended to local designated sites, although it is assumed national designations (e.g. SAC and SSSIs) would still be protected as minimum. • Options 1a, 1b, 2a, and 2b would likely lead to a neutral impact. They would retain a broader network of greenfield sites which would include national and local designated sites and would help to maintain wildlife corridors/linkages across the city. Options 1a and 1b would, however, also allow for incorporating space for greening and other non-habitat ecological

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							enhancements (e.g. features not recognised by the DEFRA BNG metric's habitat focus). This means that spaces for biodiversity could be incorporated onsite, to the benefit of species including priority species, even if onsite BNG is not feasible. Uncertain whether this would push the options into a positive impact or maintain neutral impact, however.
11. Good urban design / the historic environment	+	+	--	--	--	--	• Good urban design requires a balancing of various requirements on a development, not just the maximising of density. As such, options 1a and 1b would have positive impacts because of the balanced approach they would push for. These options would also allow for incorporating policies that guide design towards sufficiently mitigating harm (and ideally enhancing the setting of) various local and national designated (and non-designated) heritage assets. • Options 2a/2b, and 3a/3b which focus on maximising density on brownfield or greenfield sites, could have significant negative impacts for design as they forgo other design considerations in order to maximise sheer quantums of development/density of development on these sites. • In addition, for options 2a/2b/3a/3c, the minimised local standards necessary to reduce constraints on development quantums/density would likely reduce the ability to influence design with respect to local context, such as the wealth of historic assets in the city. Equally, many brownfield sites are clustered closest to the city's dense array of heritage assets, meanwhile, some of the only greenfield sites that could feasibly be explored under options 3a/3b (and that have not otherwise been ruled out for other reasons like floodplain or ecology), make an important contribution to Oxford's historic setting and townscape. Thus, additional development under these scenarios is considered to have potential for significant negative impacts on heritage in the city.

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
12. Economic growth	+	+	+	++	+	++	• All options are considered to have some level of positive impact for the economy in Oxford, though options 2a and 3a would bring more significant positive impact. • Housing delivery is a key barrier to economic growth as businesses struggle to retain or attract staff due to inability to access affordable housing nearby, thus the housing focus scenarios would have some positive impact for economic growth in this way. • Option 1b, 2b and 3b are focused on employment/economic growth. These will ensure a wide network of protected sites are protected from loss of employment uses including locally, regionally and nationally important sites, even if these sites are not currently performing. • Options 2b and 3b will more easily facilitate increases in employment floorspace by allowing existing sites to expand/intensify fully and allow new sites to come forward, particularly under option 3b which would allow development on more greenfield sites. • Regardless of the option taken, there will likely continue to be competition from high value employment uses which could push out lower value employment and reduce access to affordable workspaces and lower skilled jobs.

5.1.3 Findings from the testing of growth strategy alternatives

5.19 Table 5.3 presents a summary of the appraisal scoring for each of the six growth strategy alternatives as was detailed in the previous section.

Table 5.3: Summary of appraisal results for Local Plan growth strategy alternatives

SA Objective	Option 1A	Option 1B	Option 2A	Option 2B	Option 3A	Option 3B
1. Carbon emissions	-	--	-	--	--	--
2. Resilience to climate change	+	+	+/-	+/-	--	--
3. Efficient use of land	+	+	+/-	+/-	--	--
4. Local housing needs	+	+/-	+	-	++	-
5. Inequalities	?	?	?	?	?	?
6. Services and facilities	+/-	+	+/-	+	-	-
7. Green infrastructure, leisure and recreation	+	+	+/-	+/-	--	--
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--
9. Water	+/-	+/-	-	-	--	-
10. Biodiversity	0	0	0	0	-	-
11. Good urban design / the historic environment	+	+	--	--	--	--
12. Economic growth	+	+	+	++	+	++

5.20 The Council's chosen growth strategy (Option 1a), the balanced approach to growth with a housing focus, is clearly shown to perform well, in that it is associated with comfortably the most positives and fewest negatives. It is recognised that there is also a case to be made for options 2b, 3a and 3b from either a housing (option 3a) or an economic growth perspective (options 2b and 3b), but these benefits come at a considerable cost in terms of wider sustainability objectives.

5.21 As was initially set out in the interim Sustainability Appraisal, and following the Regulation 18 consultation for which these appraisals were first published, the Council remains of the view that option 1a represents sustainable development on balance. As

part of this, it is important to be clear that option 1a would provide significantly for housing delivery, thereby contributing strongly to meeting locally arising needs (but still likely generating unmet needs) and would make a positive contribution to economic growth, specifically by protecting key employment sites and enabling their intensification/modernization whilst also contributing new housing to reduce barriers for employees wanting to live closer to where they work. It would also allow a strong framework to be set out for protecting and enhancing the wider environment and securing various benefits for the health and wellbeing of the city's residents and visitors.

5.1.4 Refining the chosen growth strategy option post-Regulation 18

5.22 A key variable in how far the chosen growth strategy goes in addressing various Local Plan and SA objectives is the extent of protection afforded to greenfield sites across the city. A recurring theme across the Regulation 18 consultation feedback (and the earlier issues consultation) was the need for protecting green spaces in the city. Green spaces are also an important factor in meeting a variety of sustainability objectives including resilience to climate change, green infrastructure provision, biodiversity and water.

5.23 However, the city also has an outstanding need for housing and affordable housing, and reliance on brownfield sites alone to provide for this need would be insufficient. This is why the chosen growth strategy allows for some development of green spaces alongside protecting a strong green infrastructure network.

5.24 There are several potential alternatives that could be considered regarding the balance that should be struck between protecting green spaces and allowing other to potentially come forward for development. These alternatives vary in their levels of outright protection for some green spaces and whether any loss/harm to spaces that are not outright protected from all development would need to be mitigated. There are three reasonable alternatives which are as follows:

1. Protect a limited network of green spaces from any and all development through local policy. Allow remaining green spaces to be developed in line with national policy (no local policy requirements protecting them).
2. Protect a broader network of green spaces from development through local policy but permit their development if the harm/loss can be mitigated through like-for-like reprovision. Allow remaining green spaces to be developed in line with national policy (no local policy requirements protecting them).
3. A mixture of 1 and 2 – i.e. use local policy to protect a limited network of green spaces from any and all development and on a broader network of green spaces only permit development if the harm/loss can be mitigated through like-for-like

reprovision. Allow remaining green spaces to be developed in line with national policy (no local policy requirements protecting them). This is the Council's chosen option.

5.25 It is not considered a reasonable alternative to protect all green spaces from any development due to the significant lack of land for housing in the city. Neither is it considered reasonable to allow development across any green space without some local policy protections due to the significant impacts on various environmental objectives that this would incur. It is also important to remember that some level of fundamental protection would apply to many green spaces regardless of the local strategy as they have intrinsic constraints such as flood risk and/or nationally designated biodiversity or heritage value.

5.26 The options can be visualised in the below matrix:

Key elements of the approach to the option(s)	Option 1	Option 2	Option 3
A limited network of spaces protected from all development through local policy.	Yes		Yes
A broader network of spaces protected from development through local policy but allow loss where reprovision is provided.		Yes	Yes
No local policy protection for remaining spaces restricting their development – but land with intrinsic constraints e.g. flood zone 3b, national ecological/heritage designations would be protected regardless	Yes	Yes	Yes

5.27 Table 5.4 sets out an appraisal of the impacts of each of the above alternatives.

Table 5.4: Appraisal results for greenfield protection alternatives – option numbers correspond with the list in para 5.24.

Sustainability Appraisal objective	Option 1	Option 2	Option 3
1.Carbon emissions	**-**	**0**	**0**
2.Resilience to climate change	**-**	**0**	**0**
3.Efficient use of land	**-**	**+/-**	**+/-**
4.Local housing needs	**+**	**+/-**	**+/-**

5.Inequalities	**+/-**	**-**	**0**
6.Services, facilities	**0**	**0**	**0**
7.Green infra, leisure	**+/-**	**+/-**	**+**
8.Traffic and air pollution	**0**	**0**	**0**
9.Water	**-**	**0**	**0**
10.Biodiversity	**+/-**	**-**	**+**
11.Urban design/heritage	**0**	**0**	**0**
12.Economic growth	**0**	**0**	**0**

5.28 Option 1 would infer stronger protection for some spaces, and this could support inequalities and biodiversity by allowing for key green spaces in areas of deprivation, or locally designated ecological sites to be fully protected from loss or harm. However, option 1 would allow a greater range of other green spaces to be lost to development, and whilst this could support housing delivery by unlocking more sites, the lack of reprovision to mitigate losses would have negatives across various criteria. It is likely to result in loss of a range of more informal spaces that provide supporting roles for nature (e.g. wildlife corridors or areas that have potential for biodiversity), as well as people (e.g. areas for recreation, socialising, or that support general amenity in the urban realm). Many of these spaces also play vital roles in resilience to climate (urban cooling and managing surface run off).

5.29 Option 2 would assign some restrictions to development across a broader range of sites, in that any losses would need to be mitigated through reprovision, but would not go as far as ruling out development entirely on any (unless intrinsic constraints like national designation applied). This would enable development of more green sites for supporting housing provision in principle, however, as the protection would range across a wider array of sites (than just those protected under option 1) it could reduce potential for delivery due to needing to find ways to reprovide for losses. The requirement to reprovide would help to neutralise various impacts arising from development such as potential for net losses in green features and their functions in supporting resilience, locking up carbon, managing impacts on water quality.

5.30 However, option 2's reduced protections could result in negative impacts because it would not allow certain sites to be protected outright and there would be some uncertainty around what reprovision would entail. Areas with a lack of access to open space like parks, pitches or allotments could see increased deficits in access where these green spaces are developed and reprovision is targeted elsewhere. Equally, reprovision may not be suitable for mitigating impacts on ecologically important sites (e.g. local wildlife sites).

5.31 The Council's chosen option (option 3), would seek to protect some sites from all development and allow loss of others where harm/loss is sufficiently mitigated. The option comes with pros and cons for efficient use of land and housing provision as it would limit availability of some greenfield sites for development through protecting them, but would also enable development of other areas of green space for providing new housing. Where development does occur, it would help ensure that losses of particular functions and benefits of green features and spaces are reprovided neutralising negative impacts. The option would incorporate the ability to protect areas where reprovision is unlikely to be acceptable and where sites need to be retained in situ e.g. to protect important biodiversity, supporting healthy communities with access to a range of types of green space. Equally, it would actively support a strong, interconnected green infrastructure network with a variety of spaces for biodiversity.

5.32 On balance, of the three alternatives, option 3 is considered to represent the most sustainable approach to greenfield sites and fits closely with the balanced approach to growth favoured under the overall growth strategy that has been chosen for the Oxford Local Plan 2045. It would allow for a hierarchy of protection for green spaces across the city which could be tailored to stronger protections for particular functions or benefits that are vital to supporting the health and wellbeing of the city and its environment. It is also pragmatic in regards to enabling some spaces to potentially be developed in order to address equally important objectives such as supporting the provision of new housing.

5.2 Developing Local Plan policy approaches

5.33 This sub-section of the Sustainability Appraisal discusses the development of specific policies within the Local Plan 2045 as are set out in the Regulation 19 consultation, including how alternative options were considered where relevant.

5.2.1 Identifying options for policies and considering sustainability impacts

5.34 The summer 2025 Regulation 18 first draft Local Plan consultation included a number of preferred options for policies and a first draft of what these policies could look like. For each of the preferred policy approaches, the Council had also often identified

alternative approaches that could be taken and these were presented within tables of 'options sets' in the relevant supporting background papers that accompanied that consultation (also included in the updated versions published for Regulation 19).

5.35 In developing these options sets, the Council had also considered the implications of each policy option and presented a summary of these alongside the potential policy options, including:

- potential positive consequences that taking the option forward would secure for the city,
- negative or neutral consequences of the option, such as where these would conflict with local priorities, or where they could cause other challenges.

5.36 As part of weighing up the different options that could be taken during this 'optioneering' process, the Council sought to ensure that choices about each preferred approach had also been considered with regard to its sustainability implications at a high-level—with reference to the 12 SA objectives as a framework to guide officers' thinking. This has helped to ensure that sustainability considerations have been intrinsic to the process of identifying a preferred approach. A summary of these high-level screenings undertaken for each option set was also presented alongside the tables of options sets within the relevant background papers.

5.37 This high-level sustainability screening helped to identify where particular options and alternatives for a policy approach have likely significant effects against any of the SA objectives. Where potential for significant sustainability impacts were identified, it was determined that these options sets should be 'scoped in' for Sustainability Appraisal with a full assessment of their potential impacts against the 12 SA objectives, which is documented later in this report.

5.38 Table 5.5 identifies all of the options sets considered in preparing the Local Plan and which of the background papers these are presented in (alongside their high-level sustainability screening). The Table also identifies which policies were scoped in for testing through the Sustainability Appraisal, following the high-level screening (coloured blue and flagged in column three).

Table 5.5: Results of high-level SA screening of policy options sets including options sets that have been 'screened in' for detailed appraisal

Regulation 18 policy options sets	Applicable background paper where each options set is presented	Detailed appraisal needed?
001a: Housing requirement for the plan period	001 Housing need, requirement and mix	Yes

001b: Mix of housing sizes (no. bedrooms)	001 Housing need, requirement and mix	No
001c: Loss of dwellings	001 Housing need, requirement and mix	No
002a: Affordable housing – Overall requirement	002 Affordable housing	No
002b: Affordable housing: financial contributions for new student accommodation…	002 Affordable housing	No
002c: Affordable housing: financial contributions from self-contained older-persons accommodation	002 Affordable housing	No
002d: Affordable housing: financial contributions from commercial development	002 Affordable housing	No
002e: Employer-linked affordable housing	002 Affordable housing	Yes
003a: House of Multiple Occupation (HMOs)	003 Specialist housing including student accommodation, self-build, older persons	Yes
003b: Location of new student accommodation	003 Specialist housing including student accommodation, self-build, older persons	Yes
003c: Ensuring there is enough student accommodation to meet needs	003 Specialist housing including student accommodation, self-build, older persons	No
003d: Homes for travelling communities	003 Specialist housing including student accommodation, self-build, older persons	No
003e: Homes for boat dwellers	003 Specialist housing including student accommodation, self-build, older persons	No
003f: Elderly persons' accommodation and other specialist housing needs	003 Specialist housing including student accommodation, self-build, older persons	No
003g: Self-build and custom house building options	003 Specialist housing including student accommodation, self-build, older persons	No
003h: Community-led housing	003 Specialist housing including student accommodation, self-build, older persons	No
003i: Boarding school accommodation	003 Specialist housing including student accommodation, self-build, older persons	No
004a-1: Employment strategy	004 Employment and inclusive economy	No
004a-2: Making Best Use of Existing Employment Sites	004 Employment and inclusive economy	No
004a-3: Allowing housing on existing employment sites	004 Employment and inclusive economy	No
004a-4: Location of new employment uses	004 Employment and inclusive economy	No
004b: Warehousing and storage uses	004 Employment and inclusive economy	No
004c: Community Employment and Procurement Plans	004 Employment and inclusive economy	No
004d: Affordable Workspaces	004 Employment and inclusive economy	No
004e-1: Short-stay accommodation (hotels and guest-houses) (New Accommodation)	004 Employment and inclusive economy	No
004e-2: Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)	004 Employment and inclusive economy	No
005a: Protection of GI network and green features	005 Green Infrastructure and biodiversity	No
005b: Provision of new GI features	005 Green Infrastructure and biodiversity	No
005c: Provision of new GI features – Urban Greening Factor	005 Green Infrastructure and biodiversity	No

005d: Delivering mandatory net gains in biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005e: Protecting and enhancing onsite biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005f: Protecting Oxford's ecological network	005 Green Infrastructure and biodiversity	No
007a: Flood risk and Flood Risk Assessments (FRAs)	007 Flood risk, drainage and SuDS	No
007b: Sustainable Drainage Systems (SuDS)	007 Flood risk, drainage and SuDS	No
008a: Net zero buildings in operation	008 Carbon reduction and climate resilient design	No
008b: Embodied carbon	008 Carbon reduction and climate resilient design	No
008c: Retrofitting existing buildings including heritage assets	008 Carbon reduction and climate resilient design	Yes
008d: Resilient design and construction	008 Carbon reduction and climate resilient design	No
009a: Air Quality Assessments and standards	009 Natural resources	No
009b: Water resources and quality	009 Natural resources	No
009c: Soil quality	009 Natural resources	No
009d: Contaminated land	009 Natural resources	No
009e: Amenity and environmental health impacts of development options	009 Natural resources	No
010a: Healthy Design/Health Impact Assessments (HIAs)	010 Health and wellbeing	No
010b: Privacy, daylight and sunlight	010 Health and wellbeing	No
010c: Internal space standards for residential developments	010 Health and wellbeing	No
010d: Outdoor amenity space	010 Health and wellbeing	No
010e: Accessible and adaptable homes	010 Health and wellbeing	No
011a: Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011b: Non-Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011c: Archaeology	011 Urban design, placemaking, heritage and archaeology	No
011d: Principles of high-quality design of buildings	011 Urban design, placemaking, heritage and archaeology	No
011e: Efficient use of land	011 Urban design, placemaking, heritage and archaeology	No
011f: View Cones and High Buildings	011 Urban design, placemaking, heritage and archaeology	No
011g: Bin and Bike Stores and external servicing features	011 Urban design, placemaking, heritage and archaeology	No
012a: Transport assessments, travel plans and servicing and delivery plans	012 Transport	No
012b: Bicycle parking design standards	012 Transport	No
012c: Motorcycle and Powered Two Wheelers Parking Design Standards	012 Transport	No
012d: Motor vehicle parking design standards	012 Transport	Yes

012e: Electric Vehicle Charging	012 Transport	No
013a: Focusing town centre uses in existing centres	013 Livable city - including retail	No
013b: Maintaining vibrant centres	013 Livable city - including retail	No
013c: Protection and alteration of existing local community facilities	013 Livable city - including retail	No
013d: Provision of new local community facilities	013 Livable city - including retail	No
013e: Protection and alteration of learning and non-residential institutions	013 Livable city - including retail	No
013f: Provision of new learning and non-residential institutions	013 Livable city - including retail	No
013g: Protecting cultural, social and visitor attractions	013 Livable city - including retail	No
013h: Provision of new cultural, social and visitor attractions	013 Livable city - including retail	No
014a: Infrastructure considerations in new development	014 Infrastructure	No
014b: Digital Infrastructure	014 Infrastructure	No
014c: Safeguarding Land (new policy incorporated post-Regulation 18 stage)	014 Infrastructure	No

5.2.2 Targeted Sustainability Appraisal for scoped in policy options sets

5.39 As set out in Table 5.5 in the previous section, a limited number of policy options sets for the Local Plan have been taken forward for further testing in this Sustainability Appraisal because it has been determined that the options (or some of the options considered) were likely to result in significant effects against one or more of the SA objectives. Scoping them in for a full appraisal has allowed the Council to explore each option's potential for impacts against the 12 SA objectives in greater depth and to factor this into the decision about the preferred approach. The list of the 'scoped in' options sets is as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

5.40 The following tables set out the results of the detailed Sustainability Appraisal testing undertaken for these scoped in policy options sets, more detailed versions of the tables with additional commentary that explains the rationale for scoring are included in Appendix B. Options considered for each policy set are set out in columns and scored

against each of the twelve SA objectives which form the SA framework using the same scoring methodology used elsewhere in this report.

Policy Options set 001a: Housing requirement for the plan period

5.41 Three policy options were considered, as discussed in detail in Background Paper 001. The options have been revisited and updated for the Regulation 19 Sustainability Appraisal to reflect the revised Local Plan period and updated capacity assessment work from the Strategic Housing Land Availability Assessment. The options are as follows:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2025-2045).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.9,267 dwellings over the Plan period 2025-2045).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

5.42 There is some overlap in testing of this option set with the testing undertaken for the growth strategy alternatives as set out in Section 5.1, particularly where they related to having a focus on housing. Whilst that appraisal has helped inform this testing as there are considerations that overlap, this option set specifically considers different approaches to setting the housing requirement in the Local Plan and the impacts that could arise, thus the appraisal does differ.

Table 5.6: Appraisal of options set 001a

SA Objective	Option A	Option B	Option C
1. Carbon emissions	--	-	--
2. Resilience to climate change	--	0	--
3. Efficient use of land	?	?	?
4. Local housing needs	++	+	++
5. Inequalities	?	?	?
6. Services and facilities	?	?	?
7. Green infrastructure, leisure and recreation	-	0	-

8. Traffic and associated air pollution	**-?**	**+/-?**	**-?**
9. Water	**--**	**+/-**	**--**
10. Biodiversity	**-?**	**0**	**-?**
11. Good urban design / the historic environment	**--**	**0**	**--**
12. Economic growth	**+/++**	**+**	**++**

Policy Options set 002e: Employer-linked affordable housing

5.43 Policy options that were considered, as discussed in detail in Background Paper 002, are as follows:

- **Option a**: On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b**: Do not include an employer linked housing policy.

Table 5.7: Appraisal of options set 002e

SA Objective	Option A	Option B
1. Carbon emissions	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**
3. Efficient use of land	**+**	**0**
4. Local housing needs	**++**	**0**
5. Inequalities	**+**	**0**
6. Services and facilities	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**0**
9. Water	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**
11. Good urban design / the historic environment	**N/A**	**N/A**

12. Economic growth	**++**	**0**

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

5.44 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b**: Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c**: Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.
- **Option d**: Do not have any restriction on HMOs.

5.45 Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option a, c or d.

Table 5.8: Appraisal of options set 003a

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**+**	**+**	**+**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**-**
5. Inequalities	**0**	**+?**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**N/A**	**N/A**	**N/A**	**N/A**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**+/-?**	**-?**	**-**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

Policy Options set 003b: Location of new student accommodation

5.46 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

5.47 The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use which was considered to be the area where there could be significant effects that needed to be investigated further.

Table 5.9: Appraisal of options set 003b

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**N/A**	**N/A**	**N/A**	**N/A**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**0**	**0**	**0**	**?**
4. Local housing needs	**+/-**	**+/-**	**+/-**	**+/-**
5. Inequalities	**N/A**	**N/A**	**N/A**	**N/A**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**

8. Traffic and associated air pollution	**+**	**+**	**-**	**+**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**?**	**+**
12. Economic growth	**N/A**	**N/A**	**N/A**	**N/A**

Policy Options set 008c: Retrofitting existing buildings including heritage assets

5.48 Policy options that were considered, as discussed in detail in Background Paper 008, are as follows:

- **Option a**: Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c**: In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d**: Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

5.49 For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key

principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

Table 5.10: Appraisal of options set 008c

SA Objective	Option A	Option B/C	Option D
1. Carbon emissions	**+**	**+**	**0**
2. Resilience to climate change	**+**	**+**	**0**
3. Efficient use of land	**N/A**	**N/A**	**N/A**
4. Local housing needs	**N/A**	**N/A**	**N/A**
5. Inequalities	**+**	**+**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**+**	**0**
9. Water	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**0**	**-?**	**0**
12. Economic growth	**N/A**	**N/A**	**N/A**

Policy Options set 012d: Motor vehicle parking design standard

5.50 Policy options that were considered, as discussed in detail in Background Paper 012, are as follows:

- **Option a**: Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b**: Adopt parking standards for residential developments
- **Option c**: Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.

- **Option d**: Adopt parking standards for non-residential developments

Table 5.11: Appraisal of options set 012d

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	**+**	**-**	**+**	**+/-?**
2. Resilience to climate change	**N/A**	**N/A**	**N/A**	**N/A**
3. Efficient use of land	**+**	**-**	**+**	**+/-?**
4. Local housing needs	**+/-**	**0**	**0**	**0**
5. Inequalities	**-?**	**0**	**0**	**0**
6. Services and facilities	**N/A**	**N/A**	**N/A**	**N/A**
7. Green infrastructure, leisure and recreation	**N/A**	**N/A**	**N/A**	**N/A**
8. Traffic and associated air pollution	**+**	**-**	**+**	**+/-?**
9. Water	**N/A**	**N/A**	**N/A**	**N/A**
10. Biodiversity	**N/A**	**N/A**	**N/A**	**N/A**
11. Good urban design / the historic environment	**+**	**-**	**+**	**+/-?**
12. Economic growth	**0**	**0**	**+/-?**	**0**

5.2.3 Identifying a preferred option for policies

5.51 In most cases, the Regulation 18 consultation set out the preferred approach for each policy proposed for the new Local Plan. The relevant background papers (as highlighted in Table 5.5 earlier) set out in their concluding sections why the preferred approach for each policy was chosen where applicable and why alternative options were not taken forward.

5.52 Whilst all options sets were subject to high-level screening against the sustainability objectives (also documented in the relevant background papers), the Sustainability Appraisal has appraised the options sets for a selection of the policies where it was deemed that some (or all) of the available options for the policy could lead to likely significant effects against one or more of the 12 SA objectives (as was set out in the tables of the previous section). The appraisals of these 'scoped in' options sets has helped to

identify which options perform most positively against the sustainability objectives and also indicated where the Local Plan may need to incorporate mitigations to avoid negative impacts. There is no obligation to take forward the option with the most positive (or fewest negative) sustainability impacts—there may also be additional important considerations that need to inform the preferred approach—however, these findings help to more fully understand the potential for significant impacts arising from particular options and thus form an important factor in determining the preferred approach.

5.53 A summary of the rationale behind the preferred approaches to these 'scoped in' options sets, particularly where this includes additional considerations beyond performance against the sustainability objectives, is included in Table 5.12.

Table 5.12: Preferred options for the individual policy options appraised in detail in this Sustainability Appraisal report and the rationale for this.

Policy option set	**Preferred option**	**Rationale – including other considerations beyond sustainability (if applicable)**
Housing requirement for the plan period (Option set 001a - policy H1)	**Option B**	The preferred approach is to base the housing requirement on the housing capacity to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would mean that pressure would be placed on other policies aiming to meet the Plan' strategy. The option was better performing in the balance of positive and negative impacts against the sustainability objectives than the other options. Whilst it is acknowledged that the other options could have greater positive impacts in relation to delivering housing and economic growth, they also come at greater cost in terms of significant negative impacts against other sustainability objectives. Nevertheless, some mitigation will likely be needed to address negative impacts against SA criteria 1 (carbon emissions), 8 (traffic/air pollution) and 9 (water). *See Background Paper 001 for more detail*.
Employer-linked affordable housing (Option set 002e – policy H4)	**Option A**	This option will allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority). The list of specified sites reflects willing landowners and sites that would otherwise not be available for residential uses, if they were not being developed for staff. The policy also requires

		legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels. The option also had a greater number of positive impacts against the sustainability objectives than the other option tested. *See Background Paper 002 for more detail.*
Houses in Multiple Occupation (HMOs) (Option set 003a – policy H7)	**Option A**	This option will provide an opportunity for HMOs to come forward to meet needs in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. It was also generally the better performing option in terms of impacts against the SA objectives according to SA testing, compared with its alternatives (options C and D). Option B might potentially have additional positive impacts, but this is an additional element that could be combined with the other options and addresses requirements for purpose-built HMOs. It is not part of the preferred approach because of its potential impacts in competing with delivering housing that meets greater needs (such as social rented housing). *See Background Paper 003 for more detail.*
Location of new student accommodation (Option set 003b – policy H8)	Combination of **options A, E and F**	The preferred approach recognises that there may be additional sites, beyond existing campus/student accommodation sites, which are particularly suited to this type of accommodation, potentially more so than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for. It also includes a proposed approach for managing impacts from students. Options A, B, C and D were explored further through detailed testing in the SA. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. *See Background Paper 003 for more detail.*
Retrofitting existing buildings including heritage assets (Option set 008c - policy R3)	Combination of **options A and B**	The preferred approach establishes clear support for retro-fitting projects that help deliver benefits in relation to mitigating/adapting to climate change. It provides additional support to applicants in relation to designing proposals impacting sensitive traditional buildings/heritage

		assets. The combination of these options secures greater positive impacts against the SA objectives, though potential negative impact against SA obj 11 should be mitigated through wording of policy to ensure clear requirements for applications impacting historic/traditional buildings. *See Background Paper 008 for more detail*.
Motor vehicle parking design standards (Option set 012d – policy C8)	Combination of **options A, B and C**	This is the preferred approach as it pushes for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport, but accepts that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability. In terms of effects against the SA objectives, the options have varying impact. Seeking low car where possible which will help to maximise positive sustainability impacts, but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward. *See Background Paper 012 for more detail*.

5.2.4 Additional policies work post-Regulation 18

5.54 Consultation feedback on the interim Sustainability Appraisal report published as part of the Regulation 18 consultation did not identify any significant omissions in terms of policy options sets that should have been 'scoped in' for detailed assessment due to likely significant effects in addition to those identified in the previous sections. There were some specific comments in relation to the appraisal of options for the Housing Requirement policy, as are detailed in Section 3.5 along with the Council's responses.

5.55 The main Regulation 18 Consultation Report documents all of the key feedback received on the draft policies that were consulted on and the alternative options that the Council identified. The consultation report identifies where changes have been made to the proposed approaches as a result, including changes to policy wording. An additional policy has been incorporated into the Regulation 19 Local Plan which addresses the safeguarding of land for a couple of key infrastructure projects (Policy I2). Options for this policy were considered following feedback from the Regulation 18 consultation.

5.56 For clarity, it should be noted that there have also been changes to the presentation of some policy requirements in the preparation of the Regulation 19 draft compared with the drafts of policies consulted on at Regulation 18 stage. Principally, this relates to the

consolidation of requirements set out in individual draft policies at Regulation 18 addressing protections of various types of designated heritage asset (e.g. Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled Monuments) into one overarching Designated Heritage Assets policy (Policy HD3). The options previously considered and consulted on relating to these requirements remain relevant.

5.3 Developing Local Plan site allocations

5.57 This section discusses the process undertaken for developing site allocations for the Local Plan.

5.58 Chapter 8 of the Oxford Local Plan 2045 sets out policies for Areas of Focus and site allocations. Site allocations are policies specific to a site and set out the types of land use, or mix of uses, which would be acceptable on that site, or protects the site for certain types of development in line with the overall plan strategy. Areas of focus are broader areas where changes are anticipated over the Plan period resulting from new development, and the policy for each Area of focus sets outs key development principles specific to that area.

5.3.1 Identifying potential development sites in the city

5.59 In relation to developing housing allocations—the long-standing need for housing means that the Council applies a 'no stone left unturned' approach when identifying land that might be suitable for accommodating future housing in the city. Potential residential or mixed-use development sites for allocation through the Oxford Local Plan 2045 have been identified from a range of sources, which have then fed into the SHLAA, including:

- Previously allocated sites in the Oxford Local Plan 2036 and any additional sites that were being considered in the Oxford Local Plan 2040;
- Further sites submitted to the Oxford Local Plan 2040 Examination;
- Sites in historic planning policy documents such as the West End AAP and Sites and Housing Plan;
- Call for sites inviting landowners and others to nominate sites;
- Reviewing ongoing suitability of employment sites;
- Green spaces;
- Commitments (sites with planning permission or Prior Approval for housing);
- Sites refused planning permission or with expired planning permission or at pre-app, which are potentially suitable for development;
- Desk-based map survey.

5.60 In relation to employment allocations—the Council has also been reviewing employment land needs and assessing sites across the city as part of its Employment Land Needs Assessment (ELNA). This helped to identify sites to be allocated to be protected for employment development, as well as to update the Council's understanding of existing employment uses that should be protected through employment-related policies. Equally it helped to identify sites which could help deliver some homes.

5.61 Using these sources a large initial pool of potential sites for development was identified, including housing sites and employment sites as well as some mixed-use sites. The list of initial sites are then subject to different types of assessment and refinement through the SHLAA and ELNA processes in order to identify those that the Council considers reasonable and deliverable.

5.3.2 Testing and refining site allocation for the Local Plan 2045

5.62 Many of the sites initially identified from the various sources informing the SHLAA and ELNA workstreams were not ultimately suitable for allocations in the Oxford Local Plan 2045 for various reasons. For example, the presence of intrinsic environmental constraints such as national ecological designations (e.g. the SAC and SSSIs), or undeveloped land within the flood plain (greenfield flood zone 3b) may make development ultimately unsuitable. Some sites were too small to warrant a specific allocation in the Local Plan. Other sites were not considered to be deliverable, that is whether a landowner has intent or willingness to bring forward the site for development.

5.63 As with previous Local Plans undertaken for Oxford, the Sustainability Appraisal process has been integrated into this site assessment/refinement process. This allows officers to streamline the procedure such that a single assessment can be carried out for each of the potential sites whilst also ensuring that sustainability considerations are intrinsic to developing site allocations.

5.64 All sites that pass through the initial tests as part of the SHLAA/ELNA workstreams and are considered to have potential for allocation, are then subject to more in-depth appraisal using the SA framework and its site-specific criteria as was outlined in Section 3.4. Incorporating the work of the SHLAA and ELNA, alongside that of the Sustainability Appraisal, demonstrates that potential site allocations for the Local Plan 2045 have gone through a multi-stage process, as outlined in Table 5.13. The criteria applied in the SHLAA and ELNA assessments are explained in more detail in those studies.

Table 5.13: The multi-stage process of site assessment informing potential allocations for the Oxford Local Plan 2045

Stage 1a: Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. Undertaken as part of the SHLAA*.
First stage of assessment undertaken through the SHLAA considered conflicts with national policy or insurmountable environmental/physical constraints. Sites were then taken forward for further consideration as allocations for development at Stage 1a unless they were: • A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI); • Greenfield in flood zone 3b; • Less than 0.25 hectares in area OR site does not have capacity to deliver 10+ net gain dwellings**; • Already at an advanced stage in the planning process (i.e. development has commenced). *Although it should be noted that in some instances sites are still taken forward for further consideration even if one of the above applies.*
Stage 1b: Assessment against additional deliverability considerations. Undertaken as part of the SHLAA*.
All sites that had passed the Stage 1a assessment are considered at Stage 1b in terms of deliverability as part of the SHLAA process. Sites were then taken forward for further consideration as allocations for development unless: • They were extremely unlikely to become available during the plan period; • The landowner had indicated they have no intention to develop; • There was serious conflict with the National Planning Policy Framework/Oxford Local Plan Preferred Options strategy and no mitigation was possible.
Stage 2: Assessment against the SA/SEA objectives.
All sites that had passed the Stage 1a/1b assessment process were then considered against the SA/SEA objectives. Sites were scored accordingly based upon any identified positive/negative impacts against the twelve Sustainability Appraisal framework criteria.
** The Methodology section in the Strategic Housing Land Availability Assessment (SHLAA) can be referenced for further details.* *** Sites can still come forward during the Local Plan period as windfall development without the need for allocation.*

5.65 The first stages (1a and 1b) of filtering in the above Table are carried out across the SHLAA and ELNA workstreams. The sites that pass Stage 1 of the assessment process are assumed to be deliverable at a high-level - that is, they do not have insurmountable barriers to allocation. Those sites have then been subject to Sustainability Appraisal as part of stage 2. For sites that have passed onto Stage 2, an individual Site Assessment form has been completed, which documents the Sustainability Appraisal findings alongside the results from the assessment at Stage 1a and 1b for completeness, and these can be referenced in the consultation evidence base.

5.66 The site sustainability appraisal process helps to identify potential sustainability impacts that could arise from taking forward an allocation, based on an initial desktop review of each site's context using the site-specific scoring framework as set out in Section

3.4.2 of chapter 3. The scoring documents where development on a potential site can positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

5.67 For the proposed site allocations identified at Regulation 18 stage, an interim SA appraisal was published for each site. As allocation policies had not been prepared for the sites at that stage, the scoring completed was subject to further work in places (e.g. the sites were scored as 'depends upon implementation' against a number of criteria). For sites carried forward to Regulation 19, the SA site assessments have subsequently been reviewed and updated to reflect the detail of the allocations and/or where information had subsequently changed, as is discussed further below.

5.3.3 Additional sites work post-Regulation 18

5.68 Following the Regulation 18 consultation, the sites being considered for site allocations were subject to further and more in-depth assessment and refinement to inform the detail of their allocation. This also took into account responses from the consultation (including any new or amended sites submitted), updates to the evidence base, and further engagement with landowners and with statutory bodies.

5.69 This additional work was often iterative and sometimes resulted in adjustments to the site allocations compared with what was consulted on at Regulation 18, for example red lines being adjusted. It also helped to inform key principles for the site allocation policy and potential mitigation requirements being identified. The process is summarised in a Site Capacity Assessment which has been completed and published for each site.

5.70 Furthermore, subsequent to the Regulation 18 consultation, the time period of the Plan was reviewed and was adjusted from 2022-2042 to 2025-2045. In response to this, some of the evidence base which had informed site allocations needed to be refreshed to reflect the new timescales, and an additional Call for Sites was also undertaken in October 2025. Landowners of site allocations were also contacted to see if they had any additional sites, whilst planning records were reviewed to identify any additional sites which could be tested for allocations, and the Green Belt assessment study had reached a stage where Green Belt and Grey Belt sites could be identified for assessment for allocations.

5.71 The additional workstreams above resulted in some new sites being introduced to the assessment process at this point, subsequent to Regulation 18. These new sites were

put through the same process described earlier in Table 5.13 to filter them for their appropriateness for allocation.

5.72 Alongside new sites identified following the Regulation 18 consultation, there were a number of sites previously consulted on as proposed allocations which have not been carried forward as allocations in the Regulation 19 Local Plan for various reasons, these are detailed in Table 5.14 along with the reasoning for why.

Table 5.14: Potential site allocations identified at Regulation 18 stage which have not been carried forward to allocation at Regulation 19 stage and reason for why.

SHLAA ref	**Site name**	**Reason for site not being taken forward to allocation in Oxford Local Plan 2045 Regulation 19 document.**
62	University of Oxford Science Area and Keble Road Triangle	Does not need allocation- infill and alterations withing same type of use are expected and these can be sufficiently managed by the principles in the Area of Focus policy that covers this area.
111	Oxford Stadium (greyhound stadium)	Landowner interest in housing across the whole site, which would not come forward without loss of existing community use on the site.
173	Bayards Hill Primary School Part Playing Fields	No evidence site could come forward without unacceptable loss of playing field.
440	1 Pullens Lane	It is expected to be developed within the Local Plan time period but unlikely to deliver 10+
467	Edge of Playing Fields, Oxford Academy	No evidence site could come forward without unacceptable loss of playing field.
579	ROQ Site	Does not need allocation- infill and alterations withing same type of use are expected and these can be sufficiently managed by the principles in the Area of Focus policy that covers this area.
43	Old Road Campus	No significant change expected- does not need allocation
665 (inc 639)	Oriel College Sports Ground, Bartlemas and former Bowling Green	Partially carried forward as East Oxford Bowls Club to Reg 19. Significant heritage concerns (and playing pitch) on remaining section.
657	Clarendon Centre	Construction commenced
658	Barton 3b (Land to the rear of Harolde Close)	Biodiversity (potential priority species) and significant uncertaintly could mitigate for loss and delivery more than 10 homes.
660	2 Harberton Mead	Site is suitable but unlikely to deliver net gain of 10+

5.73 The final list of proposed allocations have also been reviewed against the site specific SA criteria again to assess any potential sustainability impacts arising from development on these sites. Where interim assessments were already completed, these

have been updated to take into account the latest evidence base, the specific detail of the proposed allocation policy wording as well as any other relevant context (e.g the other local plan policies). The scoring has helped to inform any necessary mitigation measures in the site allocation wording that would be needed to avoid significant negative sustainability effects. This is discussed further in Chapter 6 (Whole Plan Appraisal) and Chapter 7 (Mitigating the Local Plan's impacts).

6. Whole Plan Appraisal – predicting impacts of the Local Plan's policies and allocations (Task B3)

6.1 This chapter assesses the impacts of the Oxford Local Plan 2045 policies and allocated sites. Section 6.1 assesses the sustainability impacts of the Local Plan's policies; Section 6.2 assesses the sustainability impacts of the allocated sites; and Section 6.3 discusses the overall impacts of the Local Plan.

6.1 Predicting the impacts of the Local Plan's policies

6.2 Table 6.1 summarises the impacts of the Local Plan's policies, using the SA/SEA framework of Table 2.4.

Table 6.1: Appraisal of impacts for Local Plan 2045 policies.

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
S1: Spatial Strategy and Presumption in Favour of Sustainable Development	+	0	?	?	0	+	0	+	0	0	0	?
S2: Design Code and Guidance	0	0	0	0	0	0	0	0	0	0	++	0
S3: Infrastructure Delivery in New Development	+	0	0	+?	0	+	0	+	0	0	0	+?
S4: Plan Viability	-?	0	0	+/-	0	0	0	-?	0	0	0	+
H1: Housing Requirement	-	0	0	+	+?	-	0	+/-	-	0	0	+
H2: Delivering Affordable Homes	0	0	0	+	+	0	0	0	0	0	0	+
H3: Affordable Housing Contributions from Other Development Types	0	0	0	+/-	+	0	0	0	0	0	0	+/-
H4: Employer-Linked Affordable Housing	+/-	0	+?	+	+	0	0	+	-	0	0	+
H5: Mix Of Dwelling Sizes (Number Of Bedrooms)	0	0	+/-	+	0	0	0	0	0	0	0	0
H6: Development Involving Loss Of Dwellings	0	0	0	0	?	+?	0	0	0	0	0	0
H7: Houses In Multiple Occupation	0	0	+	+	+	0	0	?	0	0	0	0

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
H8: Location Of New Student Accommodation	0	0	0	+/-	0	0	0	0	0	0	0	+/-
H9: Linking New Academic Facilities With The Adequate Provision Of Student Accommodation	0	0	0	+	0	0	0	0	0	0	0	?
H10: Homes For Travelling Communities	0	0	0	+	+	0	0	0	0	0	0	0
H11: Homes For Boat Dwellers	0	0	0	0	0	0	0	0	0	0	0	0
H12: Older Persons And Other Specialist Accommodation	0	0	0	+	+	0	0	0	0	0	0	0
H13 Self-Build & Custom Housebuilding	0	0	-/0	+	0	0	0	0	0	0	0	0
H14: Boarding School Accommodation	+/0	0	0	0	0	+/0	0	+/0	0	0	0	-/0
E1: Employment Strategy	+?	0	++	+?	?	0	0	+?	0	0	0	+
E2: Warehousing, Storage And Distribution Uses	+/-	0	+?	0	0	0	0	+/-	0	0	0	+/- ?
E3: Community Employment And Procurement Plans	0	0	0	0	+	0	0	0	0	0	0	+
E4: Affordable Workspaces	0	0	-?	0	+	0	0	0	0	0	0	+
E5: Hotel And Short Stay Accommodation	+/- ?	0	0	+	0	0	0	+/- ?	0	0	0	+/- ?
G1: Protection Of Green Infrastructure	0	0	+	+	0	0	0	0	0	0	0	0
G2: Enhancement And Provision of New Green And Blue Features	0	+	-	+/-	0	0	++	0	+/0	+	+	+/-
G3: Provision Of New Green And Blue Features – Urban Greening Factor	0	+	-	+/-	0	0	+	0	+/0	+	+	+/-
G4: Delivering Mandatory Net Gains In Biodiversity	0	0	0	0	0	0	0	0	0	+	0	0
G5: Delivering Onsite Ecological Enhancements	0	0	0	0	0	0	0	0	0	++	0	0
G6: Protecting Oxford's Biodiversity Including The Ecological Network	0	0	-?	0	0	0	+/0	0	0	+/0	0	0
G7: Flood Risk And Flood Risk Assessments (FRAs)	0	+	0	0	0	0	0	0	0	0	0	0

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
G8: Sustainable Drainage Systems (SuDS)	0	+	0	0	0	0	+	0	+	+?	0	0
G9: Resilient Design And Construction	-?	++	0	0	+	0	0	0	+	0	+	0
R1: Net Zero Buildings In Operation	++	+?	+/-	0	+	0	0	+	0	0	+/-	0
R2: Embodied Carbon	+	0	0	0	0	0	0	0	0	0	?	0
R3: Retro-Fitting Existing Buildings	+	+	0	0	+?	0	0	0	0	0	0	0
R4: Air Quality Assessments And Standards	0	0	0	0	+	0	0	+	0	0	0	0
R5: Water Resources And Quality	0	+	0	0	0	0	0	0	+	+	0	0
R6: Soil Quality	0	0	+/-	0	0	0	0	0	0	0	0	0
R7: Land Contamination	0	0	+	0	+	0	0	0	0	0	0	0
R8: Amenity And Environmental Health Impacts Of Development	0	0	+/-	+/-	+	0	0	0	0	0	0	+/-
HD1: Principles Of High-Quality Design	0	0	0	0	0	0	0	0	0	0	+	0
HD2: Making Efficient Use Of Land	+?	0	++	+	0	0	0	+?	0	0	+/-	0
HD3: Designated Heritage Assets	0	0	-?	-?	0	0	0	0	0	0	+/0	+/-?
HD4: Non-Designated Heritage Assets	0	0	-?	-?	0	0	0	0	0	0	0	+/-?
HD5: Archaeology	0	0	-?	-?	0	0	0	0	0	0	0	+/-?
HD6: Views And Building Heights	0	0	-?	-?	0	0	0	0	0	0	0	-?
HD7: Health Impact Assessment	0	0	0	0	+	0	0	0	0	0	+?	0
HD8: Privacy, Daylight And Sunlight	0	0	-?	+/-	+/-	0	0	0	0	0	+?	0
HD9: Internal Space Standards For Residential Development	0	0	-	+/-	+/-	0	0	0	0	0	+?	0
HD10: Outdoor Amenity Space	0	0	-	+/-	+/-	0	0	0	0	0	+?	0
HD11: Accessible And Adaptable Homes	0	0	-?	+/-	+/-	0	0	0	0	0	+?	0
HD12: Bin And Bike Stores And External Servicing Features	+	0	0	0	0	0	0	+	0	0	+?	0
C1: City, District And Local Centres	+	0	+	0	0	++	0	+	0	0	0	+

Local Plan policies	1.Carbon emissions	2.Climate resilience	3.Efficienct use of land	4.Local housing needs	5.Inequalities	6.Services and facilities	7.Green infra... leisure, rec...	8.Traffic, air pollution	9.Water	10.Biodiversity	11.Design and heritage	12.Economic growth
C2: Maintaining Vibrant Centres	+	0	+	?	0	++	0	+	0	0	+	+
C3: Protection, Alteration And Provision Of Local Community Facilities	0	0	0	0	0	+	0	0	0	0	0	0
C4: Protection, Alteration And Provision Of Learning And Non-Residential Institutions	0	0	0	0	0	+	0	0	0	0	0	0
C5: Protection, Alteration And Provision Of Cultural And Social Venues And Visitor Attractions	0	0	0	0	0	+	0	0	0	0	0	+
C6: Transport Assessments, Travel Plans And Service And Delivery Plans	+	0	0	0	+	0	0	+	0	0	0	0
C7: Bicycle And Powered Two Wheelers Parking Design Standards	+	0	-?	+/-	+?	0	0	+	0	0	0	0
C8: Motor Vehicle Parking Design Standards	+/-	0	+	+	+/-	0	0	+/-	0	0	0	+/- ?
I1 Digital Infrastructure To Support New Development	-?	0	0	0	+	+	0	0	0	0	0	+
I2 Safeguarding Land for Infrastructure	0	+?	+/-	0	0	+?	0	0	0	0	0	0
Northern Edge Of Oxford Area Of Focus												
Cowley Branch Line, Littlemore And The Leys Area Of Focus												
Marston Road And Old Road Areas Of Focus												
University Areas North Of The City Centre Area Of Focus												
West End And Botley Road Area Of Focus												

6.2 Predicting the impacts of the Local Plan's site allocations

6.3 Table 6.2 details the impacts of the site allocations contained in chapter 8 of the Oxford Local Plan 2045. The table summarises the detailed individual assessments undertaken for each site, using the adapted SA framework for sites (as set out in Section 3.4.2). These are also available separately as part of the consultation evidence base here: INSERT LINK TO WEBPAGE

Table 6.2: Appraisal of impacts for Local Plan 2045 site allocations.

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPN1	0	0	0	0	++	I	0	I	+	+	-	-	+	+	-	-	0	+	-	0	-	0	0	-	I
SPN2	0	0	+	0	++	+	0	0	0	+	-	+	-	-	+	-	0	+	0	0	0	0	0	0	0
SPN3	0	0	-	0	++	+	0	+	++	+	-	-	-	-	-	-	--	+	0	-	0	0	0	+	+
SPN4	0	0	-	0	++	+	0	0	+	+	+	-	-	-	-	-	0	+	-	0	0	0	0	0	0
SPN5	0	0	-	0	++	+	0	0	+	-	-	-	-	-	-	-	0	+	0	0	0	0	0	0	0
SPN6	0	0	0	0	0	0	0	I	I	+	-	-	-	-	-	-	-	+	I	0	0	0	0	++	+
SPS1	-	-	+	0	++	+	0	0	0	+	-	+	+	-	-	-	0	-	0	0	0	0	0	0	0
SPS2	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	-	+	-	-	-	0	0	+	+
SPS3	--	-	-	0	++	+	0	0	-	+	-	+	-	+	-	-	-	+	0	0	0	0	0	0	0
SPS4	--	-	0	0	++	+	0	0	+	+	-	+	-	+	-	-	-	+	0	0	0	0	0	0	-
SPS5	0	0	0	0	++	I	0	0	0	+	-	+	-	+	-	-	0	+	0	-	0	0	0	0	0
SPS6	0	0	-	0	++	+	+	0	+	+	-	+	-	+	+	-	0	0	-	-	0	0	0	0	0
SPS7	--	0	0	0	++	+	++	I	+	+	I	-	-	+	-	-	-	+	--	0	--	0	0	+	+
SPS8	--	0	-	0	++	+	0	0	0	-	-	-	-	-	-	-	-	-	-	--	-	-	0	0	0
SPS9	0	0	0	0	I	I	+	0	0	+	-	-	-	-	-	-	--	0	-	0	0	0	0	0	0
SPS10	0	0	0	0	I	I	0	0	0	+	-	-	-	-	-	-	-	+	-	0	0	0	0	I	I
SPS11	--	-	0	0	++	+	+	I	+	-	I	-	-	-	-	-	-	+	-	0	0	0	0	0	0
SPS12	--	0	0	0	I	I	++	0	+	-	-	-	-	-	-	-	--	-	-	0	0	0	0	+	+
SPS13	--	0	0	0	++	+	++	I	+	+	I	-	-	-	-	-	-	+	--	0	--	0	0	+	+
SPS14	?	0	-	0	++	+	0	0	+	+	-	-	-	-	-	-	-	0	-	0	0	0	0	0	0
SPS15	0	0	-	0	++	+	0	I	-	+	-	+	-	-	-	-	0	+	-	0	0	0	0	0	0
SPS16	0	0	0	0	++	+	0	0	I	+	-	+	-	+	+	-	0	+	-	-	-	0	0	0	I
SPS17	0	0	0	0	I	I	0	0	0	+	-	-	-	-	-	-	-	+	-	0	0	0	0	+	+
SPE1	0	0	0	0	I	I	0	I	I	+	-	-	+	-	-	-	-	-	-	0	0	0	0	I	I
SPE2	0	0	+	0	++	+	0	0	0	+	-	-	-	+	-	-	0	+	0	-	-	-	0	0	0

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPE3	0	0	0	0	++	I	0	I	I	+	-	+	-	-	+	-	0	+	-	--	-	-	0	I	I
SPE4	0	0	-	0	++	I	0	I	I	+	-	-	+	+	+	-	0	+	-	-	-	-	0	0	0
SPE5	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	--	+	-	--	--	0	0	0	0
SPE6	-	0	-	0	++	+	0	0	+	+	-	+	-	-	+	-	-	0	0	--	-	0	0	0	0
SPE7	0	0	-	0	++	I	0	I	I	+	-	-	+	+	+	-	0	+	-	-	-	-	0	0	0
SPE8	0	0	0	0	I	I	0	0	0	+	-	+	-	+	-	-	0	+	-	0	0	-	0	0	0
SPE9	0	0	0	--	++	+	0	0	+	+	-	-	-	-	-	-	0	+	0	__	0	0	0	0	0
SPE10	0	0	0	0	0	0	0	0	0	+	-	+	+	-	+	-	0	0	-	0	0	0	0	I	I
SPE11	0	0	0	0	I	I	0	I	I	+	-	+	-	-	-	-	-	-	0	-	0	0	0	I	0
SPE12	0	0	0	0	++	I	0	-	0	+	-	+	-	+	+	-	0	+	0	0	0	-	0	0	0
SPE13	0	0	0	0	++	0	0	0	0	-	-	-	-	+	-	-	0	+	0	--	--	0	0	0	0
SPE14	0	0	-	0	++	I	0	0	+	-	-	-	-	+	-	-	--	+		--	--	0	0	0	0
SPE15	0	0	0	0	I	I	0	0	-	+	-	-	-	+	-	-	0	0	-	0	0	0	0	I	0
SPE16	0	0	0	0	++	+	0	-	+	+	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0
SPE17	0	0	+	0	I	I	0	I	0	+	-	+	-	+	+	-	0	0	0	0	0	-	0	0	0
SPE18	0	0	0	0	I	I	0	I	I	+	-	-	+	-	-	-	0	-	-	-	--	0	0	I	I
SPCW1	0	0	0	0	++	-	0	0	0	+	-	+	-	+	+	-	0	-	-	--	--	0	0	0	0
SPCW2	-	-	0	0	++	+	0	0	0	+	+	+	-	+	-	-	-	0	-	-	0	-	-	0	0
SPCW3	--	-	+	0	I	I	0	+	+	-	+	+	-	+	+	-	-	-	0	--	--	0	-	0	0
SPCW4	-	0	0	0	++	I	0	0	0	+	0	-	-	+	+	-	-	+	-	--	-	0	-	0	0
SPCW5	0	0	0	0	++	I	0	0	0	-	-	-	-	-	-	-	0	+	0	--	0	0	-	0	0
SPCW6	-	0	-	0	++	I	0	0	0	+	-	-	-	-	-	-	-	-	-	--	-	-	-	0	0
SPCW7	--	-	0	0	++	I	0	0	I	+	++	-	-	+	+	-	-	0	-	-	-	-	-	+	+
SPCW7	-	0/-	0	0	++	I	0	0	I	+	++	-	-	+	+	-	-	0	-	--	-	-	-	+	+
SPCW7	-	-	0	0	++	I	0	0	0	+	++	+	-	+	-	-	0	+	-	--	-	-	-	I	I
SPCW8	--	--	0	0	I	I	0	+	+	-	+	+	-	-	-	-	-	+	-	-	-	-	-	+	I
SPCW9	-	-	0	0	++	I	0	0	I	+	++	+	-	+	-	-	0	+	-	-	-	-	-	I	I
SPCW10	--	-	0	0	++	I	0	0	++	-	+	-	-	-	-	-	-	+	-	0	0	-	-	+	+
SPCW11	-	-	0	0	++	I	++	I/0	0	+	++	-	-	-	+	-	0	+	-	--	0	0	-	I	I

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPCW12	0	0	0	0	+ +	I	0	0	0	+	+	+	-	+	+	-	0	+	-	--	-	0	-	I	0

6.4 The appraisal of the site allocations indicates that the sites are associated with a mixture of positive and negative impacts against the Sustainability Appraisal Framework. Where potential for negative (-) or significant negative (--) impacts has been identified, the Local Plan incorporates mitigations which are discussed further in Chapter 7.

6.3 Overall and cumulative impacts of the Local Plan 2045

6.5 An interim whole plan appraisal was previously presented within the Reg 18 Interim Sustainability Appraisal (in Part two of that report) that considered the emerging proposals for the Local Plan as set out in the Regulation 18 consultation. This factored in preferred approaches and initial drafts of policies (absent of supporting text), but was limited in detail in relation to site allocations (as that consultation presented only a list of sites and high-level detail on expected uses for the sites but no specific policies).

6.6 Table 6.3 shows the updated appraisal for the overall impacts of all of the Oxford Local Plan 2045 policies and site allocations; and the cumulative impacts of the Local Plan plus other relevant plans, projects and existing trends.

Table 6.3: Whole Plan appraisal including overall and cumulative impacts of the Oxford Local Plan 2045 with commentary.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
1.Carbon emissions	+/-	+/-	• The chosen growth strategy (as with the alternatives) is likely to have a negative impact for carbon emissions due to the additional growth it supports. Whilst it seeks to follow a balanced approach to distributing growth that favours use of brownfield land, the additional growth, including 9,267 of new homes to 2045, would have emissions associated with construction and operation unless these are mitigated. • The Local Plan includes policies focused on directly mitigating the impacts of carbon emissions from new development and supporting reductions in existing buildings, which will support meeting local and national net zero carbon targets. Primarily, the Local Plan seeks to ensure new buildings are net zero in operation, in order to mitigate emissions related with buildings once they are built, and also seeks to boost levels of renewable energy generation (R1). The plan includes policies that seek to reduce embodied carbon impacts (R2), although without imposing strict limits on embodied carbon, the benefit will vary across applications and will not neutralise all construction related emissions. The Local Plan also provides explicit support for applicants to undertake retrofit of existing buildings where this will have benefits for climate (R3), although this relies on occupants coming forward to undertake such projects. • There will be other indirect benefits from elements of the Local Plan as it seeks to ensure people are supported in living lifestyles that have lower carbon impacts with policies which support access to their daily needs within local/district centres that can be accessed by walking, cycling and public transport (C1 and C2). There are also policies which set requirements for transport assessment which prioritise walking/cycling (C6), limit new car parking and set guidance for EV charging (C8), and requirements for bike parking and storage in new development (HD12, C7). • Cumulatively with other policies, for instance, the national push towards phasing out petrol/diesel engines in favour of electric vehicles and decarbonising the national energy grid, carbon emissions are likely to go down, although not at the speed needed to achieve a net-zero carbon by the city's 2040 target. There is likely to be some level of additional emissions related to construction due to wider growth across the county for the foreseeable future.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
2.Resilience to climate change	+/-	+	• The chosen growth strategy seeks to protect a strong network of green spaces for their various benefits including flood storage, slowing run off and promoting cooling. It will help to ensure space for development is balanced with space for resilience features like greening and SUDs as part of development sites. This will strongly support resilience to climate change. • However, the addition of 9,267 new homes will necessitate some loss of green spaces or other green features along with benefits they can provide and this would come at the cost of resilience. Table 6.2 identifies that eleven of the site allocations are located partially or wholly within Flood Zone 3b, another nine sites are located partially or wholly within Flood Zones 3a or 2. Mitigation requirements for these sites are discussed further in Chapter 7 of this report. • Despite the above, the Plan sets a strong framework for development to address flood risk (G7) and to include Sustainable Drainage Systems (SuDS) (G8), to mitigate impacts of current and future exposure to flood risk. Policies which protect green infrastructure (G1) and set standards for provision of new green features (G2 and G3) will have a range of benefits for resilience and would seek to ensure losses in GI are mitigated through reprovision in most circumstances. Proposals are also required to directly consider future climate change and set out how design has sought to mitigate risks (G9) which includes addressing risks of overheating. • Other policies will have indirect benefits in terms of resilience building, including requirements for energy efficiency and good fabric performance (R1), and for using water prudently (R5). • The climate will continue to change due to ongoing emissions and the long lifetime of the emissions already in the atmosphere. This will bring new risks which means that levels of resilience are in an ever-changing state. Development upstream of Oxford is likely to increase runoff, leading to increased flooding in Oxford, however, the Oxford Flood Alleviation Scheme, expected to be in operation by 2030, will reduce the risk of flooding from the River Thames for many properties in Oxford. There are planned improvements for meeting water supplies as WRMPs take effect which should support future needs, but the strain on supplies will worsen with additional growth and will need additional interventions in future.
3.Efficient use of land	+/-	+/-	• The chosen growth strategy promotes efficient use of land through a brownfield first approach, seeking to maximise capacity of sites whilst meeting other sustainability objectives. The strategy does allow for the loss of some green spaces as brownfield land alone will not be able to meet needs, but would be steering development to the lower quality green spaces in the first instance.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• Efficient use of land is promoted through various policies, principally through the density requirements and other considerations of making efficient use of land (HD2). Other policies seek to limit new car parking (C8), require applicants to remediate land so as to bring previously contaminated sites back into use (R7), and guide particular uses to local/district/city centre(s) (C1). • The plan prioritises development sites in the city for housing and aims to provide for 9,267 new homes—a target that has been informed by a detailed assessment of the capacity of all available land in Oxford. Table 6.2 identifies that thirteen of the site allocations are located on open space/greenfield land, one is previously developed land that is located within the Green Belt (SPE9 Marston Paddock Extension). The allocation policies themselves seek to maximise capacity of sites by setting minimum housing numbers that have been informed by site-specific capacity considerations. • In relation to employment land, the plan does not allocate new employment sites, but instead seeks to drive the intensifying and modernizing of employment land (E1). It also allows for an element of housing to come forward on employment sites which also supports efficiency. • It could be argued that the plan's wider environmental requirements in relation to green infrastructure, biodiversity and heritage policies reduce the 'efficiency' of land used for housing. However, efficient use of land more broadly also needs to incorporate sufficient safeguards for the wider environment to ensure the Local Plan delivers sustainable growth. • Overall, whilst there would be some negative impacts on greenfield land as some sites would inevitably be developed to accommodate housing need, there would also be positive impacts in terms of optimising development density and reducing the need to build elsewhere (where potentially higher densities would be less likely and more reliance on cars with associated car parking would be needed). Cumulatively with other Local Plans, again the Local Plan would reduce the amount of undeveloped land across the county, but less than under other alternatives.
4.Local housing needs	+	+	• The chosen growth strategy provides a positive impact for contributing to housing needs by prioritizing housing and seeking to maximise capacity across sites in the city. However, the need for balancing other Local Plan objectives such as protecting and enhancing the natural environment, alongside Oxford's intrinsic constraints on land (e.g. flood plain, national designations) means these needs cannot be met in full.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• Oxford's housing need as defined by the government standard method is 1,087 homes per year and Policy H1 provides for at least 9,267 new homes across the Plan period (463 homes/year). This will be a positive impact that reduces local housing need, but it means that there will be under-provision which adjacent local authorities would likely need to fill. • The Local Plan has policies which support housing needs of different groups. Policies H2-H4 aim to provide affordable homes, and policies H7-H14 focus on providing specialist accommodation for particular groups including those who need temporary accommodation, students, travelling communities, boat dwellers, older people, and boarding school pupils. • The overall impact of the Local Plan is to positively impact housing need, despite not being able to meet this need in the city in full. The neighbouring authorities in Oxfordshire are all at varying stages of development of their own Local Plans and these contain allocations agreed under the previous round of plan making which accommodate some of Oxford's unmet need to 2036. Cumulatively, this will have some positive impact for Local Housing Need.
5.Inequalities	+	?	• The chosen growth strategy is likely to have some indirect impacts on various elements of inequality, such as access to affordable housing or access to jobs, but this will often depend on how development comes forward. • As discussed under objective 4, the plan sets policies for supporting housing needs of various groups including affordable housing, and those with specialist housing needs. There are also design policies which help to ensure the quality of housing is addressed (e.g. wheelchair accessibility, space standards, privacy and daylight). Meanwhile, the Local Plan also includes requirements for affordable workspaces (E4) and employment and procurement plans (E3) which should have some positive impacts in relation to economic inequality. • Additionally, the plan strongly supports protection of green infrastructure and greening of new development which can have a variety of benefits for physical and mental health, as well as walking, cycling and public transport, which should help those without access to a car. Requirements of major developments to undertake Health Impact Assessment should also help to ensure proposals respond to inequalities in the local area. • The overall impact for inequalities should be positive though this is subject to some uncertainty, particularly as many of the benefits above depend on how applications come forward and the Plan's requirements are

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			implemented. The city remains one of the most unaffordable places to live, and the Local Plan is not able to provide for all of its housing need, which would include affordable homes, and this could limit any positive impact. When the Local Plan is looked at alongside wider trends in society, the cumulative impact is likely to be negated by a range of national and international drivers which continue to exacerbate the cost of living crisis, entrenching and/or worsening existing inequalities.
6.Services and facilities	**0**	**0**	• The chosen growth strategy's focus on delivering new housing on brownfield sites in the city can help to ensure more people live in areas that have good access to a range of services/facilities. Where greenfield sites are developed, these are likely to have some reduced access, although the majority of the city is generally considered to be accessible. • The new development that is being planned for in the Local Plan has the potential to bring additional pressures for existing services/facilities due to the growth in population this brings with it, and this is true of the additional 9,267 new homes the Local Plan aims to provide for. However, the Local Plan is supported by its Infrastructure Delivery Plan (IDP) and aims to ensure that adequate infrastructure is available including those that are identified in the IDP to support Oxford's housing and employment growth (S3). The Plan also supports the provision of services and facilities in town/district/local centres (C1 and C2), and aims to prevent the loss of community facilities, learning institutions and cultural venues (C3, C4, and C5). • The Local Plan also seeks to support particular infrastructure improvements aimed at ensuring that services and facilities are easily accessible, including the redevelopment of the Oxford train station, work towards a Cowley Branch Line, and other transport works (e.g. traffic filters). • Whilst the additional growth expected to arise from the Local Plan will increase pressures on existing services and facilities, the overall impact and cumulative impact with other plans and projects, is expected to be unlikely to significantly change access to services and facilities.
7.Green infrastructure, leisure and recreation	0	0	• Whilst the chosen growth strategy option does allow for some greenfield sites to be developed, it provides for the most beneficial approach to protecting high-quality, multifunctional green infrastructure and allowing for additional greening on development through a balanced approach to developing sites. • Policy G1 defines and protects a Green Infrastructure network made up of a variety of typologies of green space and other features and this includes spaces that are important to leisure and recreation such as parks and

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			pitches as well as other areas like allotments. It will help to ensure existing deficits in access that have been identified across the city will not get worse. Meanwhile, the Local Plan also sets requirements for new provision of green features, including that proposals for major development meet minimum targets according to the Urban Greening Factor and do not result in a reduction in baseline score (G2 and G3). The minimum targets are set fairly conservatively to ensure some provision of green surface cover, whilst recognizing that many sites are constrained and need to deliver a variety of uses onsite. • The framework of the above policies allows for losses of green features in particular circumstances (e.g. on supporting G1 spaces, or where retention is technically unfeasible), but also sets requirements for mitigating these losses including reprovision where necessary which should generally neutralise these. There could be instances where poorer quality green features are lost to new development, particularly on wholly greenfield sites with limited scope for fully retaining the same levels of green surface cover, however, equally, there will be situations where development will bring about an overall increase in greening, e.g. on wholly urbanised sites that need to meet minimum greening targets. • Overall, the policies of the plan will help to ensure minimum levels of greening on new development, and could bring about small levels of enhancement to existing spaces. Equally, the provisions for growth including new housing will result in the loss of some green infrastructure, though the Local Plan policies and specific requirements in the allocations will help to mitigate impacts. The cumulative impact alongside other plans and trends is likely to remain similar.
8.Traffic and associated air pollution	+/-	+	• The chosen growth strategy is likely to have positive and negative impacts. Prioritising additional housing in the city could help to reduce in-commuting by providing additional housing for workers in the city, but equally, more housing could increase car ownership depending on how this is implemented (e.g. if residents need to rely on a vehicle), including how other elements of the Local Plan's requirements are met (as discussed further below). As some housing need would not be able to be met in the city, there is potential for some additional traffic impacts elsewhere from housing needing to be delivered beyond the city, however, this is highly dependant on where and how this unmet need is incorporated into relevant plans (e.g. proximity to public transport routes). • A key theme running through the Local Plan is livable communities where people can meet all their daily needs through walking/cycling/wheeling and without relying on private vehicles. The Local Plan has policies which support vibrant local/district centres (C1 and C2). It also has policies that seek to enable people to take up

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			active and sustainable transport options, including requirements for transport assessments which prioritise walking/cycling (C6), limit new car parking and set guidance for EV charging (C8), and require provision for bike parking and storage in new development (HD12, C7). • Cumulatively, in terms of air pollution, the impact of private vehicles is likely to continue to reduce in the long term due to various county transport measures (e.g. Low Emission Zone, electrification of bus fleet etc.), and national phasing out of fossil fuel vehicles, (though this trend is longer term).
9.Water	-	--	• The chosen growth strategy will introduce additional demands for water from new housing (as with the alternatives). The balanced approach to development, however, will allow for the best outcomes in terms of mitigating impacts on the sensitive water environment. • The impacts from the Local Plan and cumulatively with other plans needs to be considered in two dimensions: Water resources • The delivery of 9,267 new homes and associated population increase will put additional demands on water resources. The Local Plan includes requirements for new development to limit impacts on water resources through water use limits and other water saving measures (R5) which responds to Oxford's location in a water stressed region. • Overall, the impact of these requirements is unlikely to completely offset the additional demands on water supplies arising from new development. Cumulatively, alongside plans for significant additional development of neighboring authority areas, the impact is likely to worsen, however, this will be mitigated somewhat by the range of water saving interventions being planned for by Thames Water through their Water Resources Management Plan, though there will likely need to be additional interventions towards the end of the plan period. Water quality • Whilst the waterbodies in the city face ongoing water quality challenges due to pollution from a range of sources, the Local Plan most directly impacts this through generating additional pressures on wastewater treatment and increasing levels of run off due to urbanisation. • The Plan sets requirements that seek to ensure development mitigates impacts on water quality where this is directly in the applicants' control (R5). Other policy areas will also have a positive impact, such as by seeking to

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			preserve amenity and environmental health from release of pollutants (R8), and protections for sensitive ecological sites (G6). Additionally, there are protections for watercourses, including requirements for ecological buffers (G2), this will be of relevance to the various sites identified in Table 6.2 as containing or being in close proximity to a watercourse. Collectively, alongside the general approaches to seeking more greening on developments should also support reducing surface water flows (G2, G3), these should help to neutralise direct negative impacts on water quality. • On wastewater treatment capacity and associated infrastructure, which is a key factor in mitigating additional wastewater treatment pressures from new development, additional housing will increase demands on wastewater treatment infrastructure. The Local Plan seeks to ensure new development is supported by investment in infrastructure where needed to support this growth (S3). Thames Water are already in the process of upgrading the Oxford Wastewater Treatment Works. The sequence of planned upgrades is expected to allow capacity for the development of new homes in and around Oxford and is an important solution for helping to mitigate water quality impacts from future growth. Cumulatively, these upgrades alongside the Local Plan's requirements should ensure a neutral impact for water quality.
10.Biodiversity	+/-	+/-	• The balanced approach to growth in the chosen growth strategy allows for protection of a network of green and blue spaces and also allows onsite capacity to be balanced with other objectives such as incorporating open space and greening which can support biodiversity, although it does allow for some loss of green spaces. • The Local Plan's chapter 4 supports biodiversity through a number of policies. Principally, those that relate to protection of biodiversity, including designated sites and ecological features elsewhere (G6) as well as policies for net gain and onsite biodiversity features (G4 and G5). The policies for protection and enhancement of green infrastructure (G1-G3) will also support preserving and making new space for species, particularly as the GI network (G1) is protecting designated sites and sites with informal benefit for biodiversity, including corridors that help species to move across the city. • However, the provision of new homes will involve building on some greenfield sites as recognised earlier, reducing space for biodiversity and potentially impacting species and habitat present there. Table 6.2 identifies that ten site allocations are on or adjacent to designated ecological sites. Separately, the Council's Source Pathway Receptor Analysis and Habitats Regulations Assessment have also identified potential sites that could

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			have impacts on designated sites. Mitigation requirements for any site allocations that could impact designated sites are discussed further in Chapter 7 of this report. • Indirectly, various policies play a role in protecting the environment from the impacts of this new development including, sustainable drainage systems requirements (G8), air quality (R4), water quality (R5) and Amenity/environmental health (R8). These should help to ensure direct negative impacts like pollution are neutralised. • Cumulatively, the impact is also likely to be mixed. Biodiversity is continuing to face a range of challenges nationally which is driving ongoing declines. Adjacent local authorities are also likely to see additional development on greenfield sites which is likely to negatively impact biodiversity. Conversely, the national Biodiversity Net Gain (BNG) requirements necessitate 10% BNG on all new planning permissions (subject to some exemptions) and are intended to bring about improvements for biodiversity nationally. The County has also now finalized and published its Local Nature Recovery Strategy for Oxfordshire which also supports the delivery of improvements for biodiversity by identifying the best opportunities for enhancement, although in the city these opportunities are limited.
11.Good urban design / the historic environment	**+/ -**	**0**	• The chosen growth strategy should avoid the most significant negative impacts to the historic environment (compared to the alternatives). It would also enable the most positive benefit in relation to high-quality design and conserving heritage, on the assumption that this requires a balancing of various types of uses on sites—meeting growth needs whilst ensuring this is sustainable. • The Local Plan's historic environment policies (HD3-HD5) are primarily focused on mitigating harm, protecting Oxford's various heritage assets from the negative impacts that could arise from new development. These will largely ensure no further harm and neutral impacts, although there may be some minor positive impact as they do discuss taking opportunities to enhance these assets in places. Table 6.2 identifies that 16 site allocations are in Conservation Areas; and 8 contain listed buildings, with a number of others lying adjacent to one of these assets and within its wider setting. Again, mitigation requirements for any site allocations that could impact sensitive heritage assets are discussed further in Chapter 7 of this report. • The Local Plan also seeks to promote high quality design in new development, principally through policies S2 and HD1, along with the Design checklist features in the appendix, as well as the other design policies in chapter 6 (HD6-HD12). Other policies in the Plan promote various aspects of high-quality design which could

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			have indirect benefits, such as requirements for green infrastructure (G2 and G3), onsite ecological enhancements (G5), and climate resilience (G9). Conversely, construction in greenfield locations could negatively affect the land/townscape, whilst net zero carbon requirements (R1) and requirements around onsite greening and biodiversity (G3 and G5) will necessitate different approaches to design than in the past so as to support sustainability and overall performance; however, they could also be construed as important elements of high quality design, so impact may be mixed and will depend upon implementation. • The NPPF and National Design Guide already strongly promote heritage protection and good design, and cumulatively with the Local Plan, change is likely to be insignificant.
12.Economic growth	+	+	• While the chosen growth strategy focuses on prioritising new sites for housing, it is likely to have a positive effect on economic growth as the employment strategy (Policy E1) creates the conditions for Oxford to meet its identified employment floorspace needs arising to 2045 within the city. • The plan's employment strategy seeks to modernise and intensify existing employment sites, while supporting a flexible approach to land-uses within the city and district centres to be able to respond quickly to changing needs and economic circumstances and encourage a wide range of uses (including housing). Encouraging a range of appropriate uses within the city and district centres supports their vitality and vibrancy which also has a positive effect on economic growth of the local economy. • The plan's employment strategy (Policy E1) also supports the complete loss of the city's poorly performing employment sites to housing and enables an element of housing to come forward on the city's Key Employment Sites (subject to certain criteria being met). • Housing affordability issues coupled with lack of affordable housing are often cited by employers in the city as reasons why they struggle to attract and retain staff. By creating the conditions to enable housing delivery across Oxford is likely to have a positive effect on economic growth by helping to address the affordability-related barriers. • The plan also supports economic diversity by ensuring that larger major development proposals can support the local economy by choosing to source materials locally, providing employment opportunities for local people or by supporting local educational initiatives by submitting a Community Employment and Procurement Plan (Policy E3). This is likely to have positive effect on the local economy and thereby support economic growth as it provides local people with the skills, training and opportunities to find work.

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			• The city's strong recent market for commercial research and development (R&D) and flexible laboratory space (and its associated prime rents) has resulted in many SMEs and social enterprises being priced out of the city or struggling to find affordable workspace. This unintended consequence of economic success risks undermining economic diversity in the city, with associated potential likely negative effects (albeit minor). The plan's response is to therefore to provide mitigation (Policy E4) which introduces a process to facilitate delivery of affordable workspaces on certain named sites. It is anticipated that, through the introduction of a flexible policy approach, this will help to overcome the unintended negative consequences of an otherwise successful economy. • Oxford's visitor economy also makes a positive contribution to economic growth, and that encouraging visitors to the city to stay longer and spend more is likely to have a positive impact on the local economy. However, the plan recognises that this should not be at the expense of much-needed housing and supports new hotel and short stay accommodation (Policy E5) at a limited number of sustainable and accessible locations including the city and district centres, and on arterial roads. This provides a balanced approach that supports both the vistior economy and enables much-needed housing to come forward elsewhere. • Oxford's strong employment land supply suggests that there is a healthy demand-driven market supporting key economic sectors relating to R&D and associated flexible-lab enabled uses. • Nevertheless, the overall impact of the plan is expected to be positive for supporting the local economy. Cumulatively, whilst macro-economic uncertainties associated with the long-term impacts of Brexit, the on-going war in Ukraine and fluctuating Tariffs from the United States, continue, the long-term economic picture for the city is a positive one. Oxford and Oxfordshire continue to contribute to the national economy, while the city anchors one end of Oxford-Cambridge Growth Corridor, which reinforces a likely longer-term positive effect on economic growth which has been supported by recent government announcements for infrastructure.

6.7 Table 6.4 summarises the main **direct** and **indirect** impacts of the Local Plan.

Table 6.4: Direct and indirect impacts of the Oxford Local Plan 2045.

Direct impact(s)	Indirect impact(s)
• Provision of new housing contributes positively towards identified housing need, including for affordable housing. • Protecting key employment sites whilst promoting their intensification and modernisation will support the local and regional economy. Requirements for affordable workspaces and skills plans should support inclusive economy. • Pushing for higher density development will help ensure more efficient use of land and support delivery of more homes, employment. • More development will result in some loss of greenspace/green infrastructure, but policies seek reprovision neutralising losses. Requirements should drive greener development, particularly brownfield sites, and also help to make additional spaces for biodiversity on sites. • More development will result in more carbon emissions associated with construction. Net zero policy should neutralise carbon associated with operation and bring about additional renewable energy generation. • Additional demands on resources like water supplies and energy, coupled with less demand on other resources like fossil fuels. • Significant environmental impacts including on biodiversity would largely be neutralised through various mitigation requirements built into the policies. • New infrastructure delivered where needed to support new development.	• Population growth associated with more housing will likely increase demands on facilities, as well as impact air quality congestion where this is accompanied by more car ownership, although mitigated somewhat by strong drive for reducing reliance on car ownership. • Capacity based requirement for housing means some need will need to be met beyond Oxford's boundaries, with knock on impacts e.g. numbers travelling into city for work impacting congestion and air quality, loss of greenspace elsewhere etc. • Enabling some shift from employment land to housing will help contribute to housing needs and will also improve accessibility to jobs, reducing barriers to employment and helping support air quality objectives and reducing congestion by allowing employees to live closer to work. • More support for retrofitting of existing buildings should improve energy efficiency and carbon footprint as well as climate resilience. Energy offset fund should support further retro-fitting of existing buildings elsewhere. • Protection and enhancement of green areas, should support health and wellbeing of residents, as well as climate change adaptation. Should also benefit biodiversity in conjunction with other interventions. • Requirements on high-quality design and heritage should protect and improve local townscape as well as setting of heritage assets. • Protection of local/district centres and requirements to support more walking/cycling/wheeling and access to public transport should benefit people's health, air quality and congestion;

6.8 Table 6.5 summarises the expected **short term, temporary** impacts versus the **long term, permanent** impacts of the Local Plan.

Table 6.5: Short term, temporary and long term, permanent impacts of the Local Plan.

Short term, temporary	Long term, permanent
• Largely these relate to impacts arising from construction processes for new development including dust, noise, traffic and other impacts. • Additional air pollution relating to some increase in cars related to population growth although should diminish as fossil fuels are phased out.	• Delivering new homes should help reduce housing need, including for affordable homes, as well as barriers to economic growth. • Some loss of employment land to other uses e.g. housing. Equally, ongoing support for the region's economy; • More sustainable, climate resilient and energy efficient buildings – supporting a reducing carbon footprint and less need to retro-fit. More space for nature and greener developments. • Increased urbanisation and intensification of development leading to some loss of green space (alongside greener development elsewhere). • Additional demands on resources like water and energy. • Reduced levels of inequality though this is also dependent on wider factors (e.g. national economy). • Reduced car traffic and air pollution due to strong support for walking/cycling/wheeling and public transport. • More infrastructure and/or services to meet additional demands generated by population growth.

7. Mitigating the Local Plan's impacts (Task B4)

7.1 This chapter discusses the necessary mitigation measures required to prevent, reduce and as fully as possible offset any significant adverse effects arising from the new Local Plan.

7.1 Mitigating negative impacts and maximising positive impacts of the Local Plan's policies

7.2 The potential for significant adverse effects arising from the Local Plan has been an integral consideration throughout the development of the Local Plan. It is important to note that the policies of the plan need to be read as a whole, and whilst some could have adverse effects in isolation, others play an important role in offsetting these and the Council has generally sought to incorporate various mitigation measures into the policy framework to address these where they have been identified – many of these are also valuable for securing positive impacts from development.

7.3 There are some key policy areas which are included in the plan which seek to address the main adverse effects arising from the plan as follows:

- **Carbon emissions** – Some level of emissions can be expected under any of the growth strategy alternatives considered for the Local Plan. Whilst the chosen growth strategy is one of the options associated with the reduced negative impact, by its nature of delivering lower levels of growth and protecting a wider range of green spaces, it would still have impacts without sufficient mitigation. **Policy R1** is the primary mitigation, seeking to ensure all new buildings are net zero in operation and ensuring no net increase in emissions through their operation by requiring high levels of energy efficiency and matching energy demand through new renewable energy generation. The approach is also supported by **Policy R3** which seeks to strongly support retro-fitting of existing buildings to reduce their carbon impacts.

  Emissions associated with construction are a more complex issue and one that cannot be fully mitigated at present. The Local Plan takes an important step forward through **Policy R2** in strengthening requirements for addressing embodied carbon in construction however, although some level of impact will remain.

- **Traffic and air pollution –** Additional growth is likely to be accompanied by some increase in private vehicle ownership, though equally it can help reduce congestion in city by allowing people to live closer to work. Whilst cumulative efforts regionally and nationally are expected to bring down emissions related to vehicles over time,

some sources of pollutants associated with things like break pads and tyre dust will remain. The Local Plan includes various policies, particularly through **Chapter 7**, that seek to promote walking/cycling/wheeling and improved access to public transport so that people and are important forms of mitigation to help reduce the impacts of growth on problems of congestion and air pollution. Additionally, **Policy R4** sets out various requirements to address air quality impacts.

- **Water –** New development being planned for can impact water quality and water resources without sufficient mitigation. Most directly, the Local Plan includes a specific water resources and quality policy (**Policy R5**) which seeks to ensure impacts are mitigated and sets out various requirements for applicants including meeting water use limits, including other water conservation methods, as well as ensuring no adverse impacts on water quality. This is also supported by a range of other policies such as preserving amenity and environmental health from release of pollutants (**Policy R8**), additional protections for sensitive ecological sites (**Policy G6**), requirements for ecological buffers (**Policy G2**), as well as generally seeking more greening on developments (**Policies G2, G3**).

  These requirements, in combination with upgrades in progress by Thames Water on the wastewater treatment infrastructure should ensure neutral impact on water quality over time. In relation to water resources, they are important for reducing impacts from development as far as is practically possible, although the impacts of the additional demand cannot be fully neutralised without further interventions more broadly across the catchment from other stakeholders.

- **Green infrastructure and biodiversity –** The city is highly constrained and in order to go as far as possible in meeting identified housing needs and meet other Local Plan objectives, some loss of greenfield sites and green infrastructure is inevitable, with associated adverse effects for wildlife and habitats. The Local Plan includes a range of important mitigation measures to neutralise these impacts as far as possible. Principally, a network of core and supporting green spaces is protected through **Policy G1** which includes national and local designated ecological sites. Additional protections related to the particular ecological considerations for designated sites is assigned through **Policy G6**. Whilst **Policy G1** allows development to impact upon supporting spaces, the impacts need to be mitigated for through reprovision to the same standard or higher.

  Additionally, the Local Plan includes strong requirements in relation to providing new green features (**Policies G2 and G3**) as well as requirements for onsite

ecological enhancements (**Policy G5**)**.** These play an important role in bringing in additional green features, and features that are important for local species which are often already under threat.

- **Infrastructure and services –** The growth that is planned for, including new housing, as well as development of employment sites, will need to be supported by new infrastructure or improvements to existing infrastructure. The Infrastructure Delivery Plan identifies the key infrastructure needs in the city which the Council has identified through engagement with various stakeholders. The Local Plan includes a strategic policy (**Policy S3**) which aims to ensure that essential infrastructure needs to facilitate new development are provided for and is important for helping to ensure the plans proposals do not have adverse impacts related to these needs not being met.

7.2 Mitigating negative site-specific impacts arising from Local Plan site allocations and maximising positives

7.4 Where development on allocated sites is likely to have significant impacts, the Local Plan's site allocation policies (as set out in Chapter 8 of the plan) incorporate mitigation measures to minimise or obviate those impacts, whilst also identifying opportunities to bring about positive impacts. Many of these refer to the plan's development management policies. In other instances, where there are no site-specific considerations that would warrant an explicit cross reference to the development management policies in the allocation itself, they would be expected to nevertheless ensure for mitigation as part of any proposed development where necessary. These include mitigation measures related to:

A. Urban design (HD1 Principles of High-Quality Design)
B. Buffer area around adjacent wildlife site (G6 Protecting Oxford's Biodiversity)
C. Walking, cycling, public transport (various policies in Chapter 7 of Local Plan although generally no explicit cross reference in site allocations unless a site-specific requirement has been identified)
D. Protection of view cone/ Tall buildings (HD6 Views and Building Heights)
E. Protection of archaeology (HD5 Archaeology)
F. Provision/protection of community facilities (C3 Protection, Alteration and Provision of Local Community Facilities)
G. Protection of biodiversity including HRA related (G6 Protecting Oxford's Biodiversity)

H. Green infrastructure requirements (G1 Protection of Green Infrastructure, G3 Provision of New Green & Blue Features – Urban Greening Factor)
I. Compensation re. green belt
J. Conservation area management (HD3 Designated Heritage Assets)
K. Air quality management (R4 Air Quality Assessments and Standards - No explicit cross reference in any site allocation policies).
L. Provision of public open space (G2 Enhancement & Provision of New Green and Blue Infrastructure)
M. Listed building management (HD3 Designated Heritage Assets)
N. Protection of water body / SuDS (G2 Enhancement & Provision of New Green and Blue Infrastructure and/or G8 Sustainable Drainage Systems)
O. Protection from flood risk / sequential approach (G7 Flood Risk and Flood Risk Assessments)

7.5 As part of the SA/SEA process, the individual site assessments, which are summarised at Table 6.2 of this report, were compared to the wording of the site allocation policies in Chapter 8 of the Local Plan. Table 7.1 shows those negative impacts identified as part of the site assessment process (in amber and red, from Table 6.2), and the mitigation measures proposed to address them. This has allowed for a cross-check to ensure that all significant impacts are mitigated.

Table 7.1: Mitigation measures (letters) for negative impacts identified as part of the site assessment process (red and amber in Table 6.2).

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPN1											C	C			C	K			E		M				
SPN2											C		C	C		K									
SPN3			H								C	C	C	C	C	K	N			J					
SPN4			H									C	C	C	C	K			E						
SPN5			H							C	C	C	C	C	C	K			E						
SPN6											C	C	C	C	C	K	N		E						
SPS1	O	O									C			C	C	K		G							
SPS2											C		C		C	K	N		E	J	M				
SPS3	O	O	H						L		C		C		C	K	N								
SPS4	O	O									C		C		C	K	N								

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPS5											C		C		C	K				J					
SPS6			H								C		C			K			E	J					
SPS7	O											C	C		C	K	N		E		M				
SPS8	O		H							C	C	C	C	C	C	K	N	G	E	J	M	D			
SPS9											C	C	C	C	C	K	N		E						
SPS10											C	C	C	C	C	K	N		E						
SPS11	O	O								C		C	C	C	C	K	N		E						
SPS12	O									C	C	C	C	C	C	K	N	G	E						
SPS13	O											C	C	C	C	K	N		E		M				
SPS14			H								C	C	C	C	C	K	N		E						
SPS15			H						L		C		C	C	C	K			E						
SPS16											C		C			K			E	J	M				
SPS17											C	C	C	C	C	K	N		E						
SPE1											C	C		C	C	K	N	G	E						
SPE2											C	C	C		C	K				J	M	D			
SPE3											C		C	C		K			E	J	M	D			
SPE4			H								C	C				K			E	J	M	D			
SPE5											C		C		C	K	N		E	J	M				
SPE6	O		H								C		C	C		K	N			J	M				
SPE7			H								C	C				K			E	J	M	D			
SPE8											C		C		C	K			E			D			
SPE9				I							C	C	C	C	C	K				J					
SPE10											C			C		K			E						
SPE11											C		C	C	C	K	N	G		J					
SPE12								G			C		C			K						D			
SPE13										C	C	C	C		C	K				J	M				
SPE14			H							C	C	C	C		C	K	N			J	M				
SPE15									L		C	C	C		C	K			E						
SPE16								G			C	C	C	C	C	K	N	G							
SPE17											C		C			K						D			
SPE18											C	C		C	C	K		G	E	J	M				
SPCW1											C		C			K		G	E	J	M				
SPCW2	O	O											C		C	K	N		E	J		D	D		
SPCW3	O	O								C			C			K	N	G		J	M		D		

Site ref	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilities	Public open space	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Biodiversity	Archaeology	Conservation area	Listed building	View cone	Historic core area	Employment Opportunities	Diversifying the economy
SPCW4	O											C	C			K	N		E	J	M		D		
SPCW5										C	C	C	C	C	C	K				J			D		
SPCW6	O		H								C	C	C	C	C	K	N	G	E	J	M	D	D		
SPCW7	O	O										C	C			K	N		E	J	M	D	D		
SPCW7	O	O										C	C			K	N		E	J	M	D	D		
SPCW7	O	O											C		C	K			E	J	M	D	D		
SPCW8	O	O								C			C	C	C	K	N		E	J	M	D	D		
SPCW9	O	O											C		C	K			E	J	M	D	D		
SPCW10	O	O								C		C	C	C	C	K	N		E			D	D		
SPCW11	O	O										C	C	C		K			E	J			D		
SPCW12													C			K			E	J	M		D		

7.6 As part of this cross-checking exercise between the site assessments and the policies, some impacts flagged in the site assessments were identified that had not initially clearly been mitigated in the site allocation policies. The team have subsequently updated the policies to pick up the additional mitigations needed and strengthen their alignment with the analysis of the site assessments. In some instances, the policies have not been amended further where an overarching policy elsewhere in the Local Plan will address the issue without need for an explicit cross-reference in the allocation policy with more site specific guidance. For example:

- Air Quality - The entire city is covered by an Air Quality Management Area, as such all sites were scored as having a potential negative impact for air quality. There are a number of hotspots dispersed across the city generally corresponding with high traffic areas, and the sites were compared with these with none being identified as sufficiently close to necessitate a significant negative impact. Policy R4 sufficiently sets out requirements for development wherever it occurs in the city without need for site-specific requirements, although some allocations do flag proximity to potential sources of air pollution which would need to be considered.
- Proximity to services (e.g. Bus stop, rail station, primary/secondary school, GP, Post Office) – where lack of access to these services is identified as a potential negative, mitigation in the policies is generally focussed around requiring applicants to

consider measures that can support active travel and improve connectivity to services in wider area via walking/cycling/wheeling and/or public transport. The policies within Chapter 7 would also act as important mitigation, though it was not considered necessary to explicitly reference these in all allocations.

8. Monitoring the Local Plan's impacts

8.1 The Council undertakes yearly monitoring of key policy areas in the Local Plan 2036, these are published annually on the Authority Monitoring Report webpage. As part of this yearly monitoring, some (but not all) of the indicators proposed in the SA/SEA report for the Local Plan 2036 have also been monitored. The lack of monitoring reflects resource constraints on the Council, and the fact that some underlying data (e.g. on water quality, condition of Sites of Special Scientific Interest, Index of Multiple Deprivation) are collected nationally and only available sporadically.

8.2 Reflecting these realities, the following table (Table 8.1) seeks to propose a realistic and implementable SA/SEA monitoring framework. The first section (columns 1 and 2) relates to Local Plan outcomes, which would be monitored annually, and would be made available annually in the Authority Monitoring Reports. These indicators relate to the effectiveness of specific plan policies that are particularly important for achieving sustainability outcomes. The second section (columns 3 and 4) relates to more long-term sustainability outcomes that link to some broader environmental standards, these would be monitored every 3 years and would be made available in an SA/SEA appendix to the appropriate Authority Monitoring Reports. They focus on sustainability outcomes that are particularly important to Oxford and also aim to act as a step towards the government's proposed Environmental Outcome Reporting.

8.3 Education and tourism are not proposed for monitoring because their links to sustainability impact of the plan are limited

Table 8.1: Proposed SA/SEA monitoring framework.

SA/SEA topic	Monitoring of Local Plan 2045 outcomes (every year)	Monitoring of sustainability outcomes (every 3 years)	Target/ standard
1. Carbon emissions	Contributions secured towards and proportion spent from energy offset fund (assumes that all other developments are net zero carbon)	Change in per capita CO2 emissions	Net zero carbon city by 2040
2. Resilience to climate change	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3	Minimise numbers of new dwellings in flood risk/avoid increasing flood risk elsewhere in city.

3. Efficient use of land & 7. Green infrastructure and leisure	Applications permitted on protected green space		Resist loss of protected green space
4. Local housing needs	Net housing completions	Change in population / households	Delivery of new housing to meet identified needs.
5. Inequalities	Net affordable housing completions	Changes in inequalities according to indices of Multiple Deprivation	Reductions in deprivation
6. Services, facilities and infrastructure	Applications permitted for new community spaces, cultural venues and visitor attractions	Significant new community assets	Delivery of new services/facilities to support local residents
8. Traffic and air pollution	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford	City/UK air quality standards
9. Water		Changes in quality of watercourses according to WFD classifications for chemical quality and biological quality.	Water Framework Directive targets
10. Biodiversity	Biodiversity net gain being delivered in the city.	Condition of SSSIs, integrity of SAC, condition of local wildlife sites.	No reduction in condition/integrity of ecological designations.
11. Urban design and heritage	Applications permitted that result in the loss of listed buildings, registered parks and gardens, scheduled monuments	Change in no. heritage assets at risk	No loss in protected heritage
12. Economic growth	Net gain / loss of employment floorspace (sqm)	% employment / unemployment in the city	Supporting economic growth through job creation.

9. Next steps

9.1 Any comments on the Regulation 19 Submission Draft Local Plan and this SA/SEA report should be submitted as part of the consultation which runs from XX to XX 2026. More details can be found on the website: INSERT LINK TO WEBPAGE ONCE LIVE

9.2 The Local Plan is expected to be submitted for examination in XX 2026. Once submitted for examination, the timetable is not within the City Council's control. Based on the timescales for the examination of the Oxford Local Plan 2036 the examination period is expected to be around 15 months, from submission to adoption meaning that the Local Plan is expected to be adopted in XX 2027.

Appendix A - Feedback from the consultation bodies on the scope of the SA report

Fulfilling the requirements of the Strategic Environmental Assessment legislation, the Council sought to make an early version of this scoping study (incorporating Tasks A1 to A4) available to the consultation bodies for feedback on the scope of the report. The Council made this document available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. This section summarises the feedback received, which is set out in Table A.1.

Table A.1: Key feedback received on early Sustainability Appraisal Scoping Study and Council responses from Natural England (NE), Environment Agency (EA) and Historic England (HE)

Respondent	Feedback provided	Council response
NE	Welcome the key issues identified within the report and support the SA objectives within the framework as they aptly cover our interests in the natural environment. We have no further comments to make on this consultation.	Feedback noted, no further actions proposed.
EA	Consider the SA Objectives highlighted in topic papers [Green Infrastructure and Biodiversity; Flood risk, SuDS and drainage and Natural Resources including air, water, soil quality and Infrastructure] of interest to the Environment Agency to be satisfactory.	Feedback noted, no further actions proposed.
EA	Agree with the key sustainability issues listed in Topic Paper 9 highlighted as issues for the Local Plan to address. Pleased to note in Topic Paper 9, that Oxford City Council will undertake a Water Cycle Study -WCS.	Feedback noted, no further actions proposed.
EA	*"Prioritising brownfield land for development may reduce opportunities for the remediation of contaminated sites which could be repurposed for public amenity or as green infrastructure with a focus on ecological/biodiversity functions."* If this is a key issue that the proposed plan will address, then the above point is not clear.	Background paper amended.
EA	Point also under *'Land/soils' should read; - "Restoration and protection of carbon-rich peat reserves that have already been degraded by historic development in the city."*	The Local Plan is limited in how it can drive restoration but point has been reworded in Background paper to try and accommodate.
EA	In Topic Paper 7, under the key issues for the Local Plan to address, the last bullet point should read; *"There will be residual risks of flooding after applying the Sequential approach Test to locating development and incorporating flood defence measures.*	Background paper amended.
EA	It is stated in Topic Paper 9 that; *"Oxford has seen significant industrial change to the present day in fact Oxford's industrial*	Background paper amended.

	history has resulted in a substantial amount of land affected by contamination." To further ensure the local plan addresses the protection of ground water resources, the Environment Agency's guidance on groundwater protection should also be referenced.	
EA	In Topic Paper 14, under the issues for the Local Plan to address, the last bullet point should read; *Meeting the wastewater infrastructure needs of additional development in the city over the Local Plan period. This is because of the awareness of how challenging this issue is.* Also, in Topic Paper 14, the list of policy framework/plans, policies and programmes should include the forth coming Water Cycle Study.	Background paper amended, the Water Cycle study has been referenced in the water infrastructure sub-section of the current situation section of the paper. The study is also referenced in topic paper 009 which talks about water resources/quality more generally.
EA	Note the list in Section 3 A as well as in topic papers 5, 7, 9 and 14 of relevant Policies, Plans and Programmes and consider it satisfactory. The plan maker (Oxford City Council) would need to update the Strategic Flood Risk Assessment and Water Cycle Study evidence base to help them understand the impact of planned growth in Oxford City Council on flood risk, water quality and resources. We suggest the following are also added to the list as they are relevant to the preparation of the local plan. • Planning Practice Guidance - Flood risk section, • Environment Agency SFRA Guidance, • Flood and Water Management Act 2010, • Flood Risk Regulations 2009 , • Strategic flood risk assessment good practice guide. • Water cycle studies guidance • Water supply, wastewater and water quality - GOV.UK	Noted, we agree many of these resources are useful, though some of it is practical guidance that may be better referenced elsewhere. Some are referenced in the relevant background papers, particularly BP007 on flood risk. Additionally, some of this guidance will be useful for preparing evidence base (SFRA and Water Cycle Study) and can be referenced there where appropriate.
EA	Regarding collecting baseline information: Advise a focus on updating the evidence base i.e. Strategic Flood Risk Assessment (SFRA) level 1 and 2 and producing the Water Cycle Study (WCS) which are useful in informing growth in Oxford City. Important to capture changes to national policy as well as to any flood map changes in Oxford, but also to understand the impact of growth on the water environment.	Noted, we have updated section 1.6 to flag we are aware of need for updating these docs and that this is happening in due course (as well as referring to them in relevant background papers).
EA	Consider that the environmental problems described in Section 5 (Table 5.1) highlight the main issues of relevance for the SEA topics/themes within the EA's remit. And the key environmental issues and trends which characterise Oxford appear to be highlighted. The Environment Agency would expect Oxford's local plan to cover the following topics, but not limited to: Net Gain; Flood risk management; Climate change; Strategic water planning; Drainage and infrastructure; Green and blue infrastructure; Contaminated land; Water Framework Directive objectives; Biodiversity; Waste management.	*For reference, Table 5.1 is now Table 4.1 in updated version of this report.* Comment is noted, the Regulation 18 first draft local plan addresses all these topics across its various draft policies (note some topics are grouped into other policies).

EA	Table 6.1: 'SA/SEA framework for plan objectives, alternatives and policies', the SA objectives and issues covered under the various SEA themes appear reasonable. Make the following suggestions: • SA objective 3: would be beneficial to include soil and land contamination under the issues that the 2042 plan will address, considering Oxford's industrial history which has resulted in a substantial amount of land affected by contamination. • For assessing the impacts of the sites and their ability to support sustainable development, we encourage the inclusion of a commentary section within the framework matrices to state, where necessary, the reasons for the effects cited and the score given to help explain the rationale behind the assessment results. This allows the transparency and also allows the reader to understand the rationale behind the scores given.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report.* SA objective 3 has been amended to make it clearer that land contamination would also be factored into issues considered. A comments box to record rationale for scoring of sustainability impacts in the site assessments is included alongside the score itself and would be used where necessary.
EA	It is important for alternatives to be considered from an early stage in the process. It appears an appraisal of Reasonable Alternatives has not yet been undertaken but will be carried out at the Regulation 18. The plan-maker may use a hierarchy to help identify suitable alternatives when considering plan options. The same hierarchy can be used to judge if suggested alternatives are reasonable, realistic and relevant. The diagram in Table 14 in Annex 5 of A Practical Guide to the Strategic Environmental Assessment Directive (publishing.service.gov.uk) contains further advice on developing and accessing alternatives can be found.	Comments are noted, for the Regulation 18 consultation, a Part 2 report is included as part of the Interim Sustainability Appraisal which addresses this.
EA	Other minor points: Please amend sentence in section 1.1 to: - 'It will need to include measures to improve public transport, protect the historic environment, protect and enhance the natural environment, and nature, reduce carbon emissions, and protect against flooding.' We agree with the key problems in Oxford outlined in section1.3. It will be useful for section 2.1 to include the fact Rivers form an intrinsic part of the unique environment of Oxford city and promotes tourism and a range of important water-based sports and social activities in the city. In Table 4.2: Current situation and likely future without the plan, we agree that without the 2042 plan, there will be Very negative impacts (compared to the current situation) on water resources. We note the Table states that the impact of the 2042 plan on water quality is unclear. We believe this is likely to end up being positive (compared to the current situation). This is because of the willingness by Oxford City Council to address water quality issues by engaging with the Environment Agency as well as working on producing a Water Cycle Study evidence to inform growth in Oxford City.	Report has been amended in response to these points.
HE	The Scoping Report is light on detail about heritage policies, plans and programmes, and Background Paper 11 includes only some of	Background paper amended, additional detail

	this content (principally within a section on "Current situation"). Analysing this in more detail, SA Objective 11 considers both designated and non-designated heritage; but the background paper centres only on designated assets. We recommend strengthening the SA baseline by updating Background Paper 11 and adding more detail that connects with designated and non-designated assets and associated programmes, such as the Oxford Heritage Asset Register and work on the local Historic Environment Record. Also, this would offer an opportunity to recognise the extent and nature of non-designated archaeological remains in Oxford which have been discussed during LP2040 production.	added to section 2 and 3 including highlighting the presence of non-designated heritage.
HE	Need to correct Background Paper 11 regarding entries in Oxford on the national Heritage at Risk Register (the wrong 3 assets are listed) and we recommend liaison with the Council's conservation team regarding the position on local buildings at risk.	Background paper amended, references have been updated to reflect the current situation.
HE	The Cowley study merits inclusion in any revised Background Paper 11, as an important piece of the Council's expanding evidence base.	Background paper amended, reference to the emerging work has been added.
HE	We are broadly comfortable with the proposed SA Framework and draft objectives. Regarding decision-making criteria, SA objective 11 should refer to setting and/or the interests that collectively comprise significance. A focus solely on archaeological or historic features within the site could miss wider impacts and opportunities. Potential wording for consideration: "~~Does~~ Is development of the site likely to affect the significance (including the setting) of one or more heritage assets, including ~~contain~~ any associated historic~~al~~, ~~or~~ archaeological, artistic and/or architectural interests ~~features~~?"	Decision-making criteria related to Table 5.12 has been updated for the site assessment framework using suggested wording.
HE	Page 14: presumably the Scoping Report will be updated to reflect recent announcements regarding support for growth in the Oxford – Cambridge corridor. Page 25: Unsure that a future without a new local plan can be considered positive for heritage. Note in background paper 11: "For Oxford, this lack of local level policies could present a real risk to the unique heritage of the city. "	The scoping report has been updated to reflected the recent announcements. In relation to likely future without a new local plan, the policies of the LP2036 would continue to apply and there would remain strong protection through national policy, though we assessed that positive impacts would be reduced in this scenario due to reduced ability to respond to ongoing pressures or changes in local context. We are happy

		to discuss this detail further however.
HE	Page 32: we advise minor wording changes to the text linked with SA objective 11 in Table 5.1, specifically we suggest: • revised wording for the second bullet, focusing on formal assessment of heritage impacts, rather than consideration of impacts on archaeological and historical value: "Potential heritage impacts of new development proposed in the plan should be assessed, both in terms of any direct physical impacts and impacts on setting ~~on areas of archaeological and historical value should be considered~~." • Revised wording for the third bullet, adding reference to heritage significance and the challenges arising from the intensification of existing sites: "Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character."	*For reference, Table 5.1 is now Table 4.1 in updated version of this report.* We have made amendments to the text in response to these points.
HE	Pages 37 – 39 (Table 6.1): as the Council is aware, "non-heritage" themes such as carbon emissions and green infrastructure have a heritage dimension. No major changes to the approach suggested – though reference to heritage is worth considering as an issue for SA Objectives 1, 2 and 7 and 12. There is scope to embed such nuance in other relevant topic papers as appropriate, which in turn inform relevant sections of the new plan, and potentially Table 6.2. We look forward to continuing our positive engagement with the Council on the cross-cutting nature of heritage. Also note, for objective 11 the issues should also include other non-designated assets, not just those of local importance.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report.* Comments around cross-cutting nature of heritage are noted and something we will keep in mind as we prepare the plan. Objective 11 has been tweaked re: non-designated assets.
HE	Page 44 (Table 6.12): we suggest deleting "(Scheduled Ancient Monument)" in the top row. Including only Scheduled Monuments implies non-designated archaeological assets of national importance are not treated in the same way, which we do not believe is the intention.	*Table 6.12 now Table 5.12 in updated draft in the updated version of the report.* We have updated the wording to reflect that Scheduled Monument is one consideration (but may not be the only one).
HE	Strongly recommend liaison with the Council's conservation team and archaeological advisers to inform the approach to SA. They are best placed to advise on: local historic environment issues and priorities.	Comment is noted.

Appendix B – Detailed SA appraisal of select policy options sets

Policy Options set 001a: Housing requirement for the plan period

The following updated policy options, reflecting revised plan period and additional Strategic Housing Land Availability Assessment work, have been considered:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2025-2045).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.9,267 dwellings over the Plan period 2025-2045).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

SA objective	Option A	Option B	Option C	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	--	-	--	Carbon impacts likely to arise from all options without additional mitigation, though more housing in city may reduce in-commuting and reduce transport emissions.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	0 Takes into account constraints like flood risk, green space etc.	-- To meet the higher housing requirement, the Council will need to take a more relaxed approach to constraints – potentially developing	

	being, the economy and the environment.	more green spaces, areas of flood risk.		more green spaces, areas of flood risk.	
3.	To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	**?** Arguably most efficient approach as capacity approach would mean still seeking to max out the developable land on sites, but also providing for open space, green infrastructure etc to meet other objectives.	**?** Might allow more efficiency in terms of higher capacity, but potentially sacrificing other uses like green space etc	Ultimately, depends upon implementation
4.	To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** The Government's Standard Method identifies housing need in the absence of other locally specific factors.	**+** Does depend upon implementation, likely does not meet housing need in full within the city, but attempts will be made to meet unmet need elsewhere. Will however still make a substantial contribution to housing need.	**++** Depends upon implementation, would likely bring forward more housing in the city to meet need, however trying to meet a global number this could come at expense of meeting other specific local needs (e.g. family dwellings,).	
5.	To reduce poverty, social exclusion, and health **inequalities**.	**?**	**?**	**?**	Depends upon implementation for all options. Depends where in the city the housing comes forward, also the tenure of the housing (e.g. how much is affordable etc). More housing isn't necessarily

				going to help inequality alone.
6. To provide accessible essential **services and facilities**.	**?**	**?**	**?**	Depends upon implementation, new housing should come alongside provision for facilities/services (e.g. developer contributions/CIL). However, nature of city means many small sites that limits opportunities to provide for new services/facilities, leading to cummulative impacts.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**-** More pressure on existing sites and potentially more loss of green spaces including various green features on sites.	**0** Wouldn't be delivering new GI, however potentially more space on sites to incorporate GI – however this is likely to be more about mitigation of impact.	**-** More pressure on existing sites and potentially more loss of green spaces including various green features on sites.	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**-?** More people accommodated in the city with some associated increase in cars. Potentially more workers able to live closer to employment reducing in-commuting	**+/-?** More people accommodated in the city and likely some increase in cars (though to lesser degree than other options). Potentially more workers able to live closer to	**-?** More people in the city and going beyond need to support growth. Though potentially more workers able to live closer to employment reducing in-commuting generated.	Complex topic to score due to varying factors that could impact traffic/emissions. Generally it is assumed emissions related to transport will reduce as private vehicles move away from fossil fuels

	generated from beyond boundaries.	employment reducing in-commuting generated from beyond boundaries, but to a lesser degree than other options, though impact beyond boundaries would be highly dependent on how any unmet need is planned for (e.g. proximity to public transport).		and air quality measures in the city continue to have positive effects.
9. To achieve **water** quality targets and manage water resources.	**--** More people means more demand for water and more pressure on wastewater.	**+/-** More people means more demand for water and more pressure on wastewater. Capacity approach, would include scope to incorporate buffers to streams and other mitigations etc.	**--** More people means more demand for water and more pressure on wastewater.	All options would put additional stress on the water environment.
10. To conserve and enhance Oxford's **biodiversity**.	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	**0** Does depend upon implementation – development would deliver net gain, but might not be within the city. But would allow protection of a network of green sites important for supporting biodiversity, and may enable developments to better mitigate impacts	**-?** Does depend upon implementation – development would deliver net gain, might not be within the city. If more sites are used for development, even less opportunity to deliver net gain in city (or protect informally important biodiversity sites).	Assume that net gain is requirement regardless of local policy.

		on biodiversity or to accommodate more biodiversity features.		
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**--** Will depend on implementation to some degree, however, assuming a more minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	**0** Capacity is based on taking into account considerations like impact on heritage. More scope to incorporate other features to support good urban design.	**--** Will depend on implementation to some degree, however, assuming a more minimal approach to heritage considerations and wider place-making choices in order to maximise capacity of sites which could lead to harm to assets onsite and nearby.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**+/++** Will make some contribution to economic growth by adding to housing and reducing barrier to employment in city, though some employment sites could be lost to housing.	**+** Will make some contribution to economic growth by adding to housing.	**++** Aims to provide enough homes for high economic growth, however, some employment sites could be lost to housing	

Conclusions/potential mitigation needed

Options A and C have some significant benefits for supporting housing and the economy but also come at the cost of more significant negative impacts against various other objectives. Option B would have positive impacts for housing and economy as it would still make an important contribution to housing need, though to a lesser degree than the other options, but it also incurs much less in the way of negative impacts for other objectives because of the capacity-based approach that drives it. Depending on the option selected, mitigation will be necessary in relation to carbon emissions, water and potentially traffic/air pollution (though this is less certain as impacts are hard to judge). Were options a or c to be selected, additional mitigation would need to be considered for a range of other areas including in relation to design/heritage, biodiversity, green infrastructure and climate resilience.

Policy Options set 002e: Employer-linked affordable housing

Policy options considered:

- **Option a:** On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b:** Do not include an employer linked housing policy.

SA objective	Option A	Option B	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**N/A**	**N/A**	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**N/A**	**N/A**	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of	**+** Potentially may lead to more efficiently using sites, or parts of sites, that would	**0**	

greenfield and Green Belt land.	otherwise not come forward.		
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**++** Would bring forward housing on sites that would not otherwise come forward, though this may not be available to everyone, it would still meet an identified need.	**0**	
5. To reduce poverty, social exclusion, and health **inequalities**.	**+** The sites would not otherwise be providing any housing. Whilst the affordable housing that would come forward might not be social rented housing, it would still be affordable rent set at a level agreed with the Council.	**0**	
6. To provide accessible essential **services and facilities**.	N/A	N/A	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and	**+** Depends upon implementation (e.g. who the units are offered to), but is likely to support this	**0**	

reducing the need to travel by car/ lorry.	criteria (e.g. reducing car travel – and some people would be housed on site).		
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	N/A	N/A	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**++** Part of the purpose of the policy is to support recruitment and retention of employees for key employment sectors.	**0**	

Conclusions/potential mitigation needed

Option a has greater positive sustainability impacts than option b. The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003a: Houses in Multiple Occupation (HMOs)

Policy options considered:

- **Option a:** Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b:** Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c:** Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.
- **Option d:** Do not have any restriction on HMOs.

Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option A, C or D.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	Potentially, option b and d could encourage more HMOs which would be denser development – potentially better for emissions – same energy source? Very indirect.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the	N/A	N/A	N/A	N/A	

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	economy and the environment.					
3.	To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**+**	**+**	**+**	**+**	New HMOs or converting existing homes would be positive for efficient use of land. HMOs are generally a very space-efficient way to house people.
4.	To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**+/-** This option could meet certain communities' needs but these would be competing with others.	**+/-** This is potentially helping to protect the existing mix of housing sizes and types (e.g. family dwelling), but also allowing HMOs to come forward.	**-** In some areas it wouldn't make a difference, but in other areas there is likely to be a signficant amount coming forward in others at the expense of meeting other local housing needs.	Anecdotally, there appears to be some demand for this type of accommodation, but it is not measured explicitly. All options could meet certain community's needs, but it would compete with other types of housing need.
5.	To reduce poverty, social exclusion, and health **inequalities**.	**0**	**+?** Purpose-built HMOs can provide a better quality of environment for residents and neighbours – planning can influence the 'healthiness' that is designed into the development.	**0**	**0**	Some of the health impacts are controlled by a separate regulatory regime (selective licensing). Planning can control the design elements.

6. To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on existing services. Cumulative impact as they are not contributing to provision.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	Potentially, more HMOs/higher density means more people and more pressure on existing green infrastructure/spaces. Cumulative impact as they are not contributing to provision.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	N/A	N/A	N/A	N/A	
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	

11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**0** The use of a threshold would prevent an overconcentration of HMOs in any one area, limiting the negative impacts to amenity/local character etc.	**+/-?** Uncertain, could result in more HMOs coming forward with associated negative impacts on local amenity, though depends upon implementation, however, new build gives the opportunity to tailor the design to mitigate impacts.	**-?** Very much depends upon implementation. This option could lead to some neighbourhoods becoming inappropriately dominated – although the policy can control which areas – losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	**-** Depends upon implementation but likely more negative. This option could lead to any of the neighbourhoods becoming inappropriately dominated, losing some local character where significant numbers of new HMOs come forward whilst others maintain theirs.	Scoring against this criterion considers the potential harmful urban design impacts that can arise from HMOs such as bins, bicycles, car parking etc.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.					

Conclusions/potential mitigation needed

Option A and C both perform better in sustainability impacts than option D, though there is some additional uncertainty with elements of option C compared with A, which could result in additional negative impact under obj 11. Option B does potentially have additional positive impacts in regard to obj 5, but this is an additional option (rather than an alternative approach that can be directly compared with the other options). The assessment does not identify any obvious requirement for mitigations to be factored in alongside either option.

Policy Options set 003b: Location of new student accommodation

Policy options considered:

- **Option a**: Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b**: Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c**: Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d**: Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use, which was considered to be the area where there could be significant effects that needed to be investigated further.

SA objective	Option A	Option B	Option C	Option D	Additional Remarks

1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	N/A	N/A	N/A	N/A	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**0**	**0**	**0** Would depend upon implementation. Would apply to campus sites or not – might encourage more efficient use of campuses.	**?** Potentially encourages more efficient use of institutional land and university-owned sites where space on the campus would be forced to be maximised – which might not otherwise be the case.	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-** Potentially meets more of the student housing need but this would be balanced out	**+/-** Potentially meets more of the student housing need (and slightly more than option a) but this would be balanced	**+/-** Potentially allows more student accommodation to come forward and meet needs, but would likely be	**+/-** Potentially means not meeting full student housing need but would ensure other housing needs	Essentially it is a balance between opening up more sites to meet specialist housing need (students) and restricting it to

	against not meeting/losing housing provision for other housing need.	out against not meeting/losing housing provision for other housing need.	competing with meeting other housing needs which might not be met as a result.	outside campus sites is not lost to student accommodation.	preserve accommodation for wider housing need.
5. To reduce poverty, social exclusion, and health **inequalities**.	N/A	N/A	N/A	N/A	
6. To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student accommodation sites)	**+** Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student accommodation sites)	**-** Potentially means student accommodation in inaccessible sites e.g. edge of city. Potentially forces reliance on private vehicles.	**+** Depends upon implementation, some locations will be more accessible to public transport/active travel than others.	

9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**+** Limits new accommodation to the areas that can arguably most-easily accommodate without additional harm to amenity.	**-** The addition of arterial routes allows the risk of long stretches of student accommodation to develop, negatively impacting amenity of the area.	**?** Depends upon implementation – could result in negative impacts as not preventing over-concentration.	**+** Generally, more positive, ensuring that student accommodation is located on the main university campuses, although potentially some negative impact where some student accommodation is outside the campuses.	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the	N/A	N/A	N/A	N/A	

culture/leisure/ visitor sector.					

Conclusions/potential mitigation needed

Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts.

Policy Options set 008c: Retrofitting existing buildings including heritage assets

Policy options considered:

- **Option a:** Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d:** Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting

key principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

SA objective	Option A	Option B/C	Option D	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+** Would support energy efficiency/carbon reduction measures in existing non-heritage buildings	**+** Would support energy efficiency/carbon reduction measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for energy efficiency/carbon reduction retro-fit.	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	**+** Would support climate resilience measures in existing non-heritage buildings	**+** Would support climate resilience measures in heritage assets, historic buildings etc. (with some constraints)	**0** No explicit local support for climate resilience retro-fit.	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**N/A**	**N/A**	**N/A**	
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**N/A**	**N/A**	**N/A**	

5. To reduce poverty, social exclusion, and health **inequalities**.	**+** Helps to make existing homes more liveable and (over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.	**+** Helps to make existing homes that are also older buildings more liveable and (over time) more affordable – particularly in terms of lowering energy bills/reducing exposure to fuel poverty.	**0**	
6. To provide accessible essential **services and facilities**.	**N/A**	**N/A**	**N/A**	
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	**N/A**	**N/A**	**N/A**	
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers to electric systems this will have some limited positive impacts in	**+** Heating systems (e.g. boilers) are a source of some of the pollutants contributing to poor air quality in the city. Where retro-fit drives replacements in boilers to electric systems this will have some limited positive impacts in	**0**	

	helping to reduce this source of pollution.	helping to reduce this source of pollution.		
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	**0** Some retrofit measures (e.g. solar panels, small wind turbines) have the potential to change the character of a neighbourhood, although this impact is likely to be insignificant outside conservation areas etc.	**-?** Some retrofit measures are incompatible with heritage assets, listed buildings etc. The impact would depend on the specific implementation of the principles/requirements in the policy.	**0**	
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	N/A	N/A	N/A	

Conclusions/potential mitigation needed

Option A and B/C both have positive impacts against a number of criteria. Option B/C may have negative impacts in terms of urban design/historic environment, though this depends on how retro-fit schemes are implemented. Mitigation for this impact could be achieved through a robust set of principles/guidance as part of the policy or in supporting guidance.

Policy Options set 012d: Motor vehicle parking design standard

Policy options considered:

- **Option a:** Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b:** Adopt parking standards for residential developments
- **Option c:** Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d:** Adopt parking standards for non-residential developments

For this appraisal, options b and d which refer to parking standards, assumes the Council would apply County standards. This means that for residential, there will be more parking provision per household (e.g. one space per dwelling) than the low car option. For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision – so it will depend upon implementation.

SA objective	Option a	Option b	Option c	Option d	Additional Remarks
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and transport emissions). Parking standards would result in more

					car parking for resi, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	N/A	N/A	N/A	N/A	
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants will need to give proper and adequate consideration as to where the car parking should be located in the most efficient way. Parking standards will result in more land being used for car

					parking which is inefficient, but for non-resi, impact is less certain as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	**+/-?** Low car may provide more space for housing, however the space may be used for other uses. Equally, low car could impact viability of some schemes and ability to deliver affordable housing although the evidence for this is complex and uncertain.	0	0	0	
5. To reduce poverty, social exclusion, and health **inequalities**.	**-?** Even though low car would allow some spaces for operational needs (e.g. those who need a car for work),	0	0	0	

		it might not provide enough spaces. Typically, many such jobs that rely on a car are low paid, so could negatively impact this group. However, does depend upon implementation of each scheme (and who is occupying).				
6.	To provide accessible essential **services and facilities**.	N/A	N/A	N/A	N/A	
7.	To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
8.	To reduce **traffic and associated air pollution** by improving travel choice, shortening	**+**	**-**	**+**	**+/-?**	Low car would achieve significant reductions in car parking (and transport emissions/congestion). Parking standards

journeys and reducing the need to travel by car/ lorry.					would be county standards, which would result in more car parking for resi, but for non-resi, impact is less certain, as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
9. To achieve **water** quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's **biodiversity**.	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while	**+**	**-**	**+**	**+/-?**	Low car standards mean that applicants will need to give proper and adequate consideration as to where the car parking should be located in the most efficient way (including making space for

respecting local character and context and promoting innovation.					active/sustainable transport measures) which should benefit urban design. Parking standards will result in more land being used for car parking which is inefficient, though again, impact for non-resi is less certain depending on if car free is delivered or not.
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector.	**0**	**0**	**+/-?** Low car may provide more space for employment uses, however the space may be used for other uses. Equally, low car could impact viability of some schemes including new developments although the evidence for this is complex and uncertain. It will also depend upon implementation and the specifics of the site.	**0**	

Conclusions/potential mitigation needed

Options A and C are score most positively against the SA objectives. Option B has negative impacts against some of the criteria, potentially allowing additional cars than the low car options which could have some congestion impacts and emissions, though in relation to emissions these are likely to reduce in the long term as transport decarbonises. Option D is uncertain because it allows applicants to justify car requirements which may result in additional vehicles (or may result in fewer vehicles where car free development is delivered), it depends on implementation.