

Appendix 2 - Regulation 19 Sustainability Appraisal Report (inc. background papers)

Sustainability Appraisal report (Regulation 19 consultation): page 2

Appendix A (Feedback from the consultation bodies on the scope of the SA report): page 145

Appendix B (Detailed SA appraisal of select policy options sets): page 150

Appendix C (Site assessments): page 183

Background Paper 001 – Housing Need, Requirement and Mix: page 556

Background Paper 002 – Affordable Housing: page 580

Background Paper 003 – Specialist Housing: page 605

Background Paper 004 – Employment and Inclusive Economy: page 654

Background Paper 004a – Key Employment Sites Methodology: page 719

Background Paper 005a – Green Infrastructure: page 743

Background Paper 005b – Biodiversity: page 820

Background Paper 006 – Green Belt: page 848

Background Paper 007 – Flood Risk, SuDS and Drainage: page 893

Background Paper 008 – Carbon Reduction and Climate Resilient Design: page 918

Background Paper 009 – Natural Resources (Air, Water, Land): page 961

Background Paper 010 – Health and Wellbeing: page 993

Background Paper 011 – Urban Design, Placemaking, Heritage and Archaeology: page 1030

Background Paper 012 – Transport: page 1063

Background Paper 012a – Traffic Modelling: page 1099

Background Paper 013 – Liveable City: page 1106

Background Paper 014 – Infrastructure: page 1137

*Sustainability
Appraisal report
(Regulation 19
consultation)*

**Oxford Local Plan
2045**

Oxford Local Plan 2045

Regulation 19 Sustainability Appraisal report

Table of Contents

1. Non-technical summary	5
1.1 Introduction and process for undertaking Sustainability Appraisal	5
1.2 Policy context.....	7
1.3 Sustainability context and existing problems	7
1.4 SA/SEA Framework	11
1.5 Developing and testing Local Plan options	12
1.6 Assessing the Local Plan's impacts	15
1.7 Minimising negative impacts and maximising positive impacts.....	18
1.8 Monitoring the Local Plan's impacts	19
1.9 Next steps	20
2. Introduction.....	21
2.1 Background to Oxford City	21
2.2 The Oxford Local Plan 2045.....	22
2.3 Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)	26
2.4 Habitat Regulations Assessment.....	30
2.5 Health Impact Assessment.....	31
2.6 Difficulties in compiling the SA/SEA.....	31
2.7 Structure of this report	32
3. Updated Sustainability Appraisal scoping	34
3.1 Policy context (Sustainability Appraisal Task A1)	34
3.1.1 National context	34
3.1.2 Regional context	36
3.1.3 Local context.....	38
3.1.4 Other Key Plans, Programmes and Environmental Objectives	39
3.2 Sustainability context (Sustainability Appraisal Task A2)	39
3.2.1 Current situation and likely future without a new Local Plan	39

3.2.2 Existing problems at areas of particular environmental importance.....	46
3.3 Identify key sustainability issues and problems (Sustainability Appraisal Task A3) ..	49
3.4 Develop the SA framework (Sustainability Appraisal Task A4)	56
3.4.1 The SA framework for plan objectives, alternatives and policies	57
3.4.2 The SA framework for sites	60
3.5 Previous consultation on the emerging Sustainability Appraisal (Sustainability Appraisal Task A5)	66
4. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1)	69
4.1 Developing the Local Plan vision, themes and objectives	69
4.2 Testing the Local Plan themes and objectives	71
5. Exploring options for the emerging Local Plan 2045 (Sustainability Appraisal Tasks B2 and B3)	75
5.1 Developing the growth strategy for Local Plan 2045	75
5.1.1 Identifying reasonable alternatives for the Local Plan growth strategy.....	75
5.1.2 Reviewing the reasonable alternatives for the Local Plan Growth Strategy	78
5.1.3 Testing the growth strategy alternatives.....	80
5.1.3 Findings from the testing of growth strategy alternatives.....	90
5.2 Developing Local Plan policy approaches	91
5.2.1 Identifying options for policies and considering sustainability impacts	91
5.2.2 Targeted Sustainability Appraisal for scoped in policy options sets	95
5.2.3 Additional policies work post-Regulation 18	104
5.3 Developing Local Plan site allocations.....	107
5.3.1 Identifying potential development sites in the city	107
5.3.2 Testing and refining site allocation for the Local Plan 2045.....	108
5.3.3 Additional sites work post-Regulation 18	110
6. Whole Plan Appraisal – predicting impacts of the Local Plan’s policies and allocations (Task B3)	113
6.1 Predicting the impacts of the Local Plan’s policies	113
6.2 Predicting the impacts of the Local Plan’s site allocations	117

6.3 Overall and cumulative impacts of the Local Plan 2045	120
7. Mitigating the Local Plan’s impacts (Task B4)	134
7.1 Mitigating negative impacts and maximising positive impacts of the Local Plan’s policies.....	134
7.2 Mitigating negative site-specific impacts arising from Local Plan site allocations and maximising positives	136
8. Monitoring the Local Plan’s impacts	140
9. Next steps	143
Appendix A - Feedback from the consultation bodies on the scope of the SA report	144
Appendix B – Detailed SA appraisal of select policy options sets	149
Appendix C – Individual site assessment forms – see separate document	

1. Non-technical summary

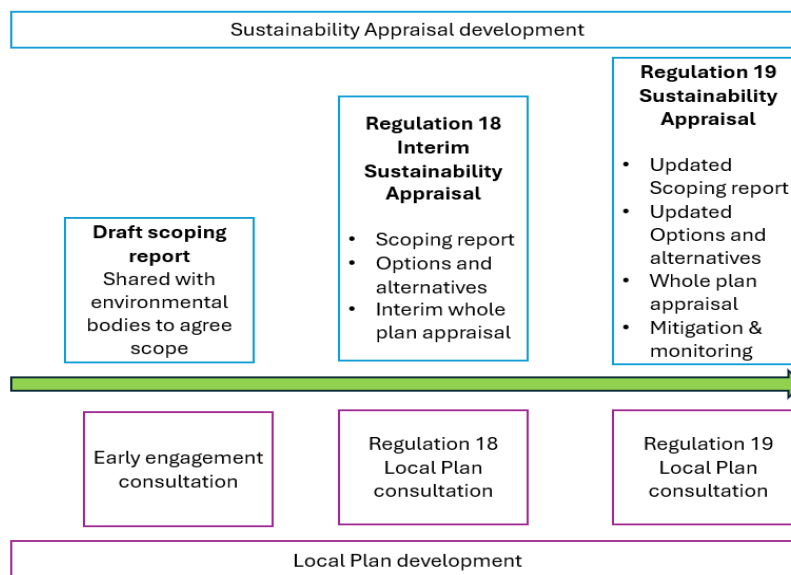
1.1 Introduction and process for undertaking Sustainability Appraisal

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



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
<u>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</u> Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft of scoping report to agree 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
<u>Stage B: Developing and refining alternatives and assessing effects</u> 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 <u>Stage C: Prepare the SA report</u> <u>Stage D: Seek representations on the SA report from consultations and the public</u>	Published as part of this Regulation 19 SA report - including updated information related to earlier stages. Current stage
<u>Stage E: Post adoption reporting and monitoring</u> 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 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 an 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 NO ₂ , 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 NO ₂ 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).

SA/SEA topic	Overall impact	Comments
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.
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	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,

SA/SEA topic	Overall impact	Comments
and recreation		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 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/international 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.	+	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

SA/SEA topic	Overall impact	Comments
Economic growth		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 1.8: 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 during the Regulation 19 consultation beginning 30th January 2026. The Local Plan will be submitted for examination later in 2026, and it is expected to be adopted in 2027.

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 km² (17.6 miles²), 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).

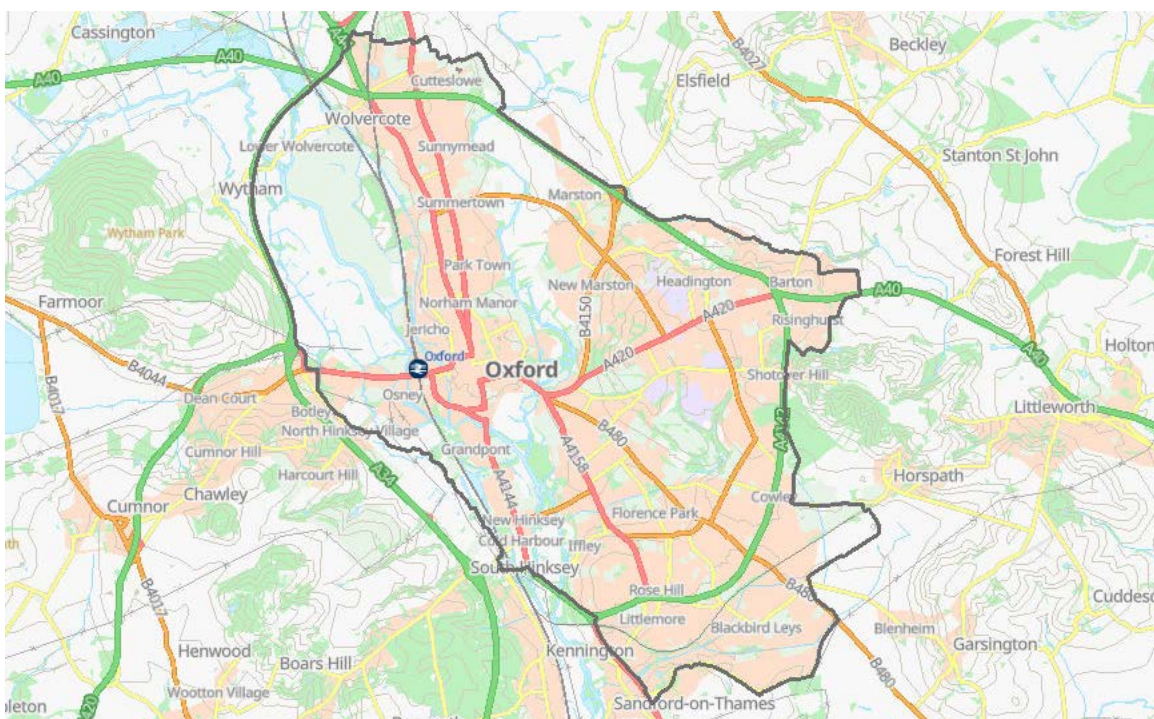


Figure 2.1: Map of Oxford including administrative boundaries of the City Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.)

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, 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 Plan 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.

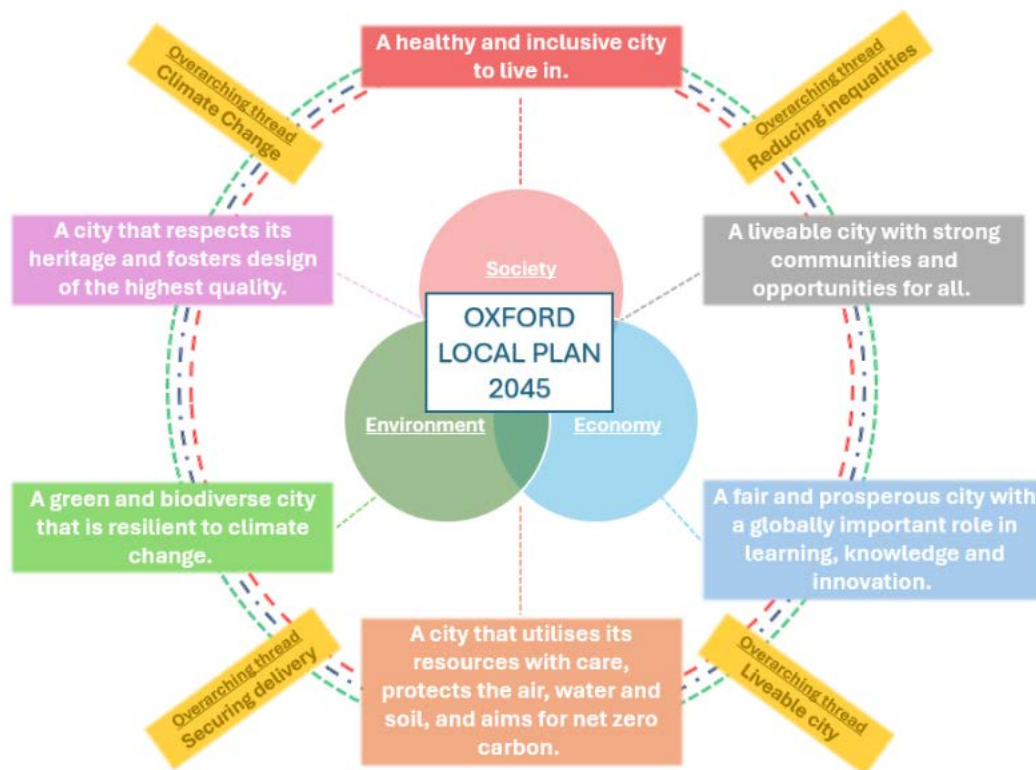
The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges.

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; ensuring a liveable city; and securing delivery.

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



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, biodiversity; guiding the quality of urban design; achieving the city’s net zero carbon 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, excluding Areas of Focus and site allocations.

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 effects, this assessment process is widened to include an analysis of social and economic effects through the legal requirement to undertake a Sustainability Appraisal (SA) as 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 this 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 environmental considerations have been taken into account during its preparation;	In individual Background Papers.
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. (These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects);	Chapters 4, 5 and 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 Appendix A and discussed 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 adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	Will be carried out upon plan adoption
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Will be carried out from after plan adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	Throughout the process

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 pillars 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 early 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). Feedback was incorporated into the subsequent versions.
- 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
<u>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</u> Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft of scoping report to agree 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
<u>Stage B: Developing and refining alternatives and assessing effects</u> 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 <u>Stage C: Prepare the SA report</u> <u>Stage D: Seek representations on the SA report from consultations and the public</u>	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 has also undertaken a separate Health Impact Assessment on the Local Plan. This reflects the reality that planning and the built environment can have a significant role to play in shaping healthier environments (or hindering them) for people, which is particularly pertinent to Oxford, being a city characterised by health inequalities across its population. 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’ of the Sustainability Appraisal process (as set out in Table 2.3 earlier), as were first published in the summer of 2025, during the Reg 18 consultation, as well as the remainder of Stage B. 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 – discusses 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 the 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
011 Urban design, placemaking, heritage and archaeology	11. To promote good urban design through the protection and enhancement of the historic environment and heritage assets while respecting local character and context and promoting innovation.	Cultural Heritage, Landscape
004 Employment and inclusive economy	12. To achieve sustainable inclusive economic growth , including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	Population, Material Assets

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 (LNRs) 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 First originating from the 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 \(amended in 2019\)](#),
- The Air Quality Directive (2008/50/EC) which is transposed into the [Air Quality Standards Regulations 2010](#)
- The 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 Oxfordshire 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). Green belt runs through the city, following the lines of the rivers. The Council has undertaken green belt assessment to identify whether any sites would be suitable for allocation in the Local Plan and this has informed the plan making process. 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) sets 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 an 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 shown 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 identified in 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](#))

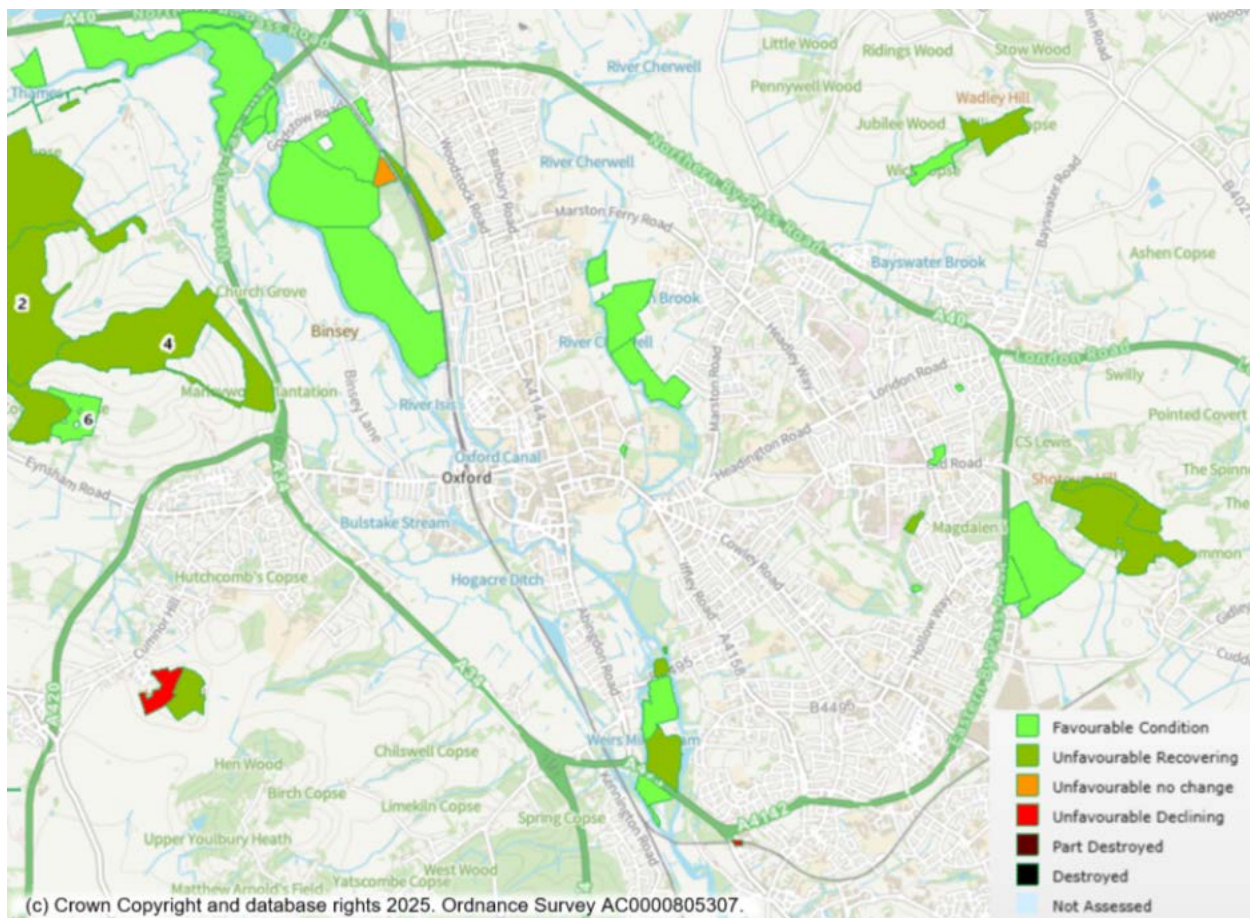


Table 3.2: Additional details relating to Sites of Special Scientific Interest (SSSIs) within Oxford or nearby

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 <i>(also comprises part of Oxford Meadows SAC)</i>	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes <i>(also comprises part of Oxford Meadows SAC)</i>	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 <i>(also comprises part of Oxford Meadows SAC)</i>	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 works 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 have published the Local Nature Recovery Strategy, a key requirement arising from the Environment Act. This document identifies opportunity areas for biodiversity enhancement in the city and wider county (including offsite BNG), although there may be other opportunity areas. The LNRS does not assign additional protection nor mandate enhancements itself.
11. To promote good urban design through the protection and enhancement of the historic environment and heritage assets	• Oxford is a historic city, characterised by an abundance of designated and non-designated heritage assets which form an important part of the city's character.

while respecting local character and context and promoting innovation.	• Potential heritage impacts of new development proposed in the plan should be considered and assessed where necessary, both in terms of any direct physical impacts and impacts on setting. • Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character. • Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city. • Green spaces and features should be woven into the urban fabric. • Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets, which will require a Whole Building Approach to any retro-fit measures. • Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.
12. To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Employment in the city remains high and likely to continue growing; • The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing. Some employers have reported difficulties attracting and retaining staff because of these issues; • It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs; • The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites; • A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner; • Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D;

	• Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people; • State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages; • Some changes were accelerated by the pandemic. For instance, due to the increase in on-line retail, the make-up of the city and district centres are seeing a shift in their make-up. Once dominated by retail, other uses, such as employment and educational uses are bringing footfall and vitality and these important centres. Examples of non-retail opportunities that are emerging in city centres include co-working spaces, R&D and more; • Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city; • Small scale brownfield development across the city is more likely to put pressure on existing school places and will not in itself provide new school sites.

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 • Waste reduction • Sustainable construction practices including addressing embodied carbon	Climatic Factors, Air
2. To build resilience to climate change , including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• Flooding • Resilient and adaptable building design and layout • Overheating	Water, Climatic Factors
3. To encourage the efficient use of land through good design and layout, and minimise the use of greenfield and Green Belt land.	• Building densities and layout • Greenfield versus Brownfield land • Green belt and grey belt • General biodiversity and designated sites • Soils including peat reserves. • Land contamination	Soil, Material Assets, Biodiversity
4. To meet local housing needs by ensuring that	• Housing numbers • Housing size/mix	Material Assets,

everyone has the opportunity to live in a decent affordable home.	• Affordable housing • Specialist accommodation (e.g. care homes, gypsies/travelers) • Student accommodation	Population, Human Health
5. To reduce poverty, social exclusion, and health inequalities .	• Regeneration • Geographical spread of new development • Accessibility for areas of deprivation • Availability of services/infrastructure in areas of deprivation • Improving health and wellbeing and reducing health inequalities	Population, Human Health, Material Assets
6. To provide accessible essential services and facilities .	• Daily needs met within a short walk/cycle ride • Thriving city/local centres • Retail/shops provision • Community facilities, health care/GP, schools • Facilities for children/young people inc. play areas • 'Grey' infrastructure e.g. wastewater treatment, transport, energy.	Material Assets, Human Health
7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all.	• A network of green and blue infrastructure • Leisure facilities • Playing fields and public open space • Distribution/location as well as quantity of typologies of green infrastructure (inc the above)	Landscape, Biodiversity, Human Health,
8. To reduce traffic and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Promoting active travel – walking/cycling etc. • Reducing reliance on the private car • Public transport incl. Train station and branch line • Commuting and housing/jobs balance • Parking • Electric vehicle charging points, zero emission zones • Addressing poor air quality and links to transport	Air, Climatic Factors
9. To achieve water quality targets and manage water resources.	• Water use and water resources • Improving water quality and avoiding further deterioration • SUDS, buffers on streams etc.	Water, Biodiversity
10. To conserve and enhance Oxford's biodiversity .	• Habitat Regulations Assessment inc. Air quality and recreational disturbance • SAC, SSSIs, local nature designations • Biodiversity more generally (e.g. wildlife friendly measures and habitat features) • 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 amidst 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 and 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 addresses 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 were 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 <i>The Oxford Local Plan 2045 will...</i>
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.

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 the 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. These were initially consulted on as part of the Regulation 18 consultation in June/July 2025, including the preferred growth strategy (which is referred to for the purposes of this report as the 'chosen growth strategy').

5.3 The Local Plan's 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. The primary focus under the 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 quantum/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 consulted on at Regulation 18 stage , 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 Reviewing the reasonable alternatives for the Local Plan Growth Strategy

5.17 The six growth strategy alternatives, including the chosen strategy, were consulted on at Regulation 18. Feedback to the consultation did not identify any significant omissions in relation to other distinct alternatives that should have been considered.

5.18 However, the context of the Local Plan’s development has continued to evolve since the Regulation 18. For example:

- There has been an update to the Local Plan period (now covering the period 2025-2045), as discussed in Section 2, with consequential updates to the housing and employment evidence base to align.
- The Council has also continued to develop the Local Plan, including preparing site allocation policies (not subject to consultation previously), as well as developing further its wider evidence base.
- A range of feedback was provided more broadly on the Local Plan in response to the Regulation 18 consultation, a recurring theme being the importance of protecting green space (see the Regulation 18 consultation report).

5.19 This evolving context necessitates revisiting the growth strategy alternatives to ensure that they remain robust and appropriate.

5.20 Whilst the update to the Local Plan period was necessary for various technical reasons, the impact on the strategy principally relates to the growth that needs to be planned for, including for housing and employment. Key updates show very little change for the 2025-2045 period as compared to the previous 2022-2042 period. The housing need is still 21,740, applying the standard method over 20 years. Employment need has not

changed much and is still at the level that it is likely can be met within existing and pipeline sites.

5.21 The Council has sought to comprehensively explore the capacity of all of the proposed site allocations for Regulation 19. Alongside the capacity assessments, the Council has undertaken site specific sustainability appraisals (as discussed further in Chapter 6) to identify key sustainability impacts. The housing capacity has been updated, including after a new call for sites, but the capacity has not changed much and at 9,267 over the Plan period is still significantly below supply.

5.22 Another avenue of additional technical work has explored the matter of Green Belt, with updates to National Policy setting out the importance of the Council reviewing its green belt for availability for housing. A green belt assessment has been undertaken, with a number of sites identified for assessment. However, regardless of the performance of Green Belt parcels against the purposes of Green Belt, the Green Belt in and of itself has not been treated as a constraint. Parcels of the Green Belt were then considered for development potential in accordance with the chosen growth strategy of the Plan and its other objectives. Ultimately, one additional site allocation has been identified as suitable for allocation.

5.23 A recurring theme in the Regulation 18 consultation was a push for the Local Plan to protect remaining green space from development. Protecting green infrastructure for its range of multi-functional benefits is a key objective of the Local Plan, however, the city also has an outstanding need for housing, and reliance on brownfield sites alone to provide for this need would be insufficient. The chosen growth strategy, which seeks a balanced approach to growth that protects a strong hierarchy of green spaces, whilst allowing some to come forward for development in recognition of the city's high housing need, is considered to align with the feedback.

5.24 In light of the updated SHLAA work which confirms that the Council remains unable to meet its identified housing need, it is important that a thorough approach has been taken to identifying additional land for housing in Oxford. It was considered important therefore to further consider the plan's approach to green infrastructure protection and whether an alternative approach may provide additional potential homes in the city. To that end, the Council has undertaken some further appraisal work of options for the protection of green infrastructure – this is discussed in detail in later in Chapter 5 (Section 5.2). The findings of this additional appraisal work, however, did not identify significant variation in impacts for housing provision between the options.

5.25 In summary, whilst it was important to revisit the alternatives through the additional work post-Regulation 18, this has not led to any additional distinct reasonable alternatives for the Local Plan Growth Strategy being identified. The appraisal of the alternatives as set out in the following section has been reviewed in light of the above, although this has not resulted in material changes to scoring.

5.1.3 Testing the growth strategy alternatives

5.26 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).

5.27 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 quantum 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 quantum/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 would be 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 quantum/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 (compared to 1b).
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 quantum/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 quantum/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 quantum 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 effect. 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 sites 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 quantum 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. It is 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 quantum 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 quantum/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

5.28 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	+	+	+	++	+	++

5.29 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.

5.30 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.

5.2 Developing Local Plan policy approaches

5.31 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

5.32 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 (these are also included in the appendices of the updated versions published for Regulation 19).

5.33 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.

5.34 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.

5.35 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.

5.36 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

5.37 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 through the Sustainability Appraisal process because it was 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

5.38 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 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.

5.39 Testing these 'scoped in' options sets in this way helps to identify which options perform most positively against the sustainability objectives and where the Local Plan may need to incorporate mitigations to avoid negative impacts. It should be noted that 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, the 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. After each table, the preferred option taken forward in the Local Plan is set out with a rationale for why.

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

5.40 Three policy options were considered, as discussed in detail in Background Paper 001. The options have been revisited and updated for this 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.

5.41 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 (at a high-level) 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	+ / ++	+	++

5.42 The option taken forward in the Local Plan is **Option B**, which is to base the housing requirement on the housing capacity (*see Background Paper 001 for more detail*). This was 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.

5.43 The option was found to be 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 would likely be needed to address negative impacts against SA objectives 1 (carbon emissions), 8 (traffic/air pollution) and 9 (water).

Policy Options set 002e: Employer-linked affordable housing

5.44 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

5.45 The option taken forward in the Local Plan is **Option A**, which allows, 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 (see *Background Paper 002 for more detail*). The option also had a greater number of positive impacts against the sustainability objectives than the other option tested.

5.46 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.

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

5.47 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.

5.48 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

5.49 The option taken forward in the Local Plan is **Option A**, which 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 (see *Background Paper 003 for more detail*). 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).

5.50 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).

Policy Options set 003b: Location of new student accommodation

5.51 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.

5.52 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

5.53 The approach taken forward in the Local Plan is a combination of **Options A, E and F** (see *Background Paper 003 for more detail*). This 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 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.

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

5.54 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.

5.55 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

5.56 The approach taken forward in the Local Plan is a combination of **Option A and B**. This establishes clear support for retro-fitting projects that help deliver benefits in relation to mitigating/adapting to climate change and provides additional support to applicants in relation to designing proposals impacting sensitive traditional buildings/heritage assets (see *Background Paper 008* for more detail).

5.57 The combination of these options secures greater positive impacts against the SA objectives, though potential negative impact against SA objective 11 should be mitigated through wording of policy to ensure clear requirements for applications impacting historic/traditional buildings.

Policy Options set 012d: Motor vehicle parking design standard

5.58 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

5.59 The approach taken forward in the Local Plan is a combination of **Options A, B and C** (see *Background Paper 012 for more detail*). This approach 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.

5.60 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.

5.2.3 Additional policies work post-Regulation 18

5.61 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.

5.62 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.

5.63 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.

Additional appraisal of options for protection of the green infrastructure network

5.64 The Initial Sustainability Appraisal Screening of Options Sets undertaken to inform the Regulation 18 consultation (summer 2025) did not consider a detailed appraisal was required for option set 005a which related to protection of green infrastructure and green features. This was because (as drafted) the proposed option set resulted in generally

neutral, or positive impacts, the extent of which were considered to depend largely on implementation.

5.65 Following the Regulation 18 consultation, various comments were received on Policy G1, and the Local Plan's approach more generally to green space protection from a wide range of organisations and individuals. Following the analysis of the representations, and as additional work was carried out to refine the growth strategy alternatives between the statutory consultation stages, a full appraisal of a selection of some of the options consulted upon at the Regulation 18 consultation stage was considered to be beneficial. This is because the extent of protection within the green infrastructure network potentially affects the underlying context to the plan's strategy.

5.66 The initial set of options as presented in the background paper (005a Green Infrastructure) covered a range of approaches to protecting green spaces as well as other features like trees. These are reproduced in this report's Appendix B. The Council has considered what an alternative approach to protecting a hierarchy of green spaces would look like. This involved appraising updated versions of two of the previously identified options (as presented in the aforementioned background paper) for further appraisal.

5.67 These two options focus on either protecting a selection of spaces completely from development for their in-situ benefits, (Core GI), or extending the hierarchy of protection further to include an additional set of spaces which would be protected unless loss or harm from development can be sufficiently mitigated (Supporting GI). The options can be summarised as follows:

- **Option a*** - Protect a limited network of green spaces from any and all development through local policy (core GI). Allow remaining green spaces to be developed in line with national policy.
- **Option b*** - Protect a limited network of green spaces from any and all development through local policy (core GI) AND 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 (supporting GI). Allow remaining green spaces to be developed in line with national policy. This (option b*) represents the draft policy approach consulted on at Regulation 18.

*It is assumed under both options that land with intrinsic constraints e.g. flood zone 3b, national ecological/heritage designations would be protected regardless.

Table 5.12: Appraisal of options for green infrastructure network protection, adapted from the Regulation 18 options set 005a

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

5.68 As the Regulation 18. options screening did not identify likely significant effects for this option set, the main driver of this new options appraisal focused on whether there would be likely significant effects on SA Framework Objective 4 – Housing. A full SA has been undertaken, however, which looks across the whole framework as is shown in the table above.

5.69 The SA of these option sets identified that both option sets would result in a minor positive effect on housing delivery and when the two options were considered side-by-side, the SA concluded that there would be a marginal difference in housing delivery. However, Option b* (the Reg. 18 approach) was considered to deliver more environmental and social benefits than the more limited GI protection provided through Option a*. On balance, therefore, this scored more highly against the SA Framework Criteria and accordingly has been selected as the policy approach to carry forward within the Regulation 19 version of the plan.

5.3 Developing Local Plan site allocations

5.70 This section discusses the process undertaken for developing site allocations for the Local Plan. The process is discussed in greater detail in Background Paper 015.

5.71 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 out key development principles specific to that area.

5.3.1 Identifying potential development sites in the city

5.72 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 Strategic Housing Land Availability Assessment (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 Area Action Plan 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.

5.73 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. The approach to employment sites is discussed in further detail in Background Paper 004.

5.74 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

5.75 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.

5.76 As with previous Local Plans undertaken for Oxford, the Sustainability Appraisal process has been integrated into the 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.

5.77 All sites that pass through the initial tests as part of the SHLAA/ELNA workstreams and are considered to have potential for allocation, are 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). <i>Although it should be noted that in some instances sites are still taken forward for further consideration even if one of the above applies.</i>
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.
<i>* The Methodology section in the Strategic Housing Land Availability Assessment (SHLAA) can be referenced for further details.</i> <i>** Sites can still come forward during the Local Plan period as windfall development without the need for allocation.</i>

5.78 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.

5.79 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).

5.80 For the proposed site allocations identified at Regulation 18 stage, an interim site assessment incorporating 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 site assessment forms 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

5.81 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.

5.82 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 line boundaries 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 form which has been completed and published for each site (note these forms are separate to the site assessments incorporating site-specific sustainability appraisal discussed earlier).

5.83 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.

5.84 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.

5.85 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 uncertainty 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+

5.86 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. As discussed earlier, 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. Efficient 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

	1. Carbon emissions	2. Climate resilience	3. Efficient 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
Local Plan policies												
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

	1. Carbon emissions	2. Climate resilience	3. Efficient 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
Local Plan policies												
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	+

	1. Carbon emissions	2. Climate resilience	3. Efficient 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
Local Plan policies												
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

6.3 As set out in the table, the impacts of the individual policies in the Local Plan vary depending on their focus, however, the Plan needs to be read as a whole, and there is limited value in reading into the impacts of any one policy in isolation. Where policies relate to requirements for growth, such as housing, they positively support related SA objectives, such as providing for local housing need, but have potential to impact aspects of the environmental objectives more negatively such as water or carbon. Meanwhile, policies primarily focussed on mitigating impacts of development, such as net zero carbon and water quality policies, as well as protection for the historic environment, naturally lead to positive impacts against related SA criteria, whilst having neutral impacts in other areas. The benefit of the testing does help to inform the whole plan appraisal later in this chapter and will be drawn upon further there.

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

6.4 Table 6.2 details the impacts of the 53 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). The full assessments for each site are also available separately as part of Appendix C.

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	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	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	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
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
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	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
SPCW6	-	0	-	0	+	I	0	0	0	+	-	-	-	-	-	-	-	-	-	--	-	-	-	0	0
SPCW7	--	-	0	0	+	I	0	0	I	+	+	-	-	+	+	-	-	0	-	-	-	0	-	+	+
SPCW7	-	0/-	0	0	+	I	0	0	I	+	+	-	-	+	+	-	-	0	-	--	-	0	-	+	+
SPCW7	-	-	0	0	+	I	0	0	0	+	+	+	-	+	-	-	0	+	-	--	-	0	-	I	I
SPCW8	--	--	0	0	I	I	0	+	+	-	+	+	-	-	-	-	-	+	-	-	-	-	-	+	I
SPCW9	-	-	0	0	+	I	0	0	I	+	+	+	-	+	-	-	0	+	-	-	-	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	+	+	0	0	0	+	+	+	-	+	+	-	0	+	-	-	-	0	-	+	0

6.5 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, this suggests the potential need for mitigation and the approach to handling this through the Local Plan is discussed further in Chapter 7.

6.6 It should be noted that the Local Plan also includes five 'Area of Focus' policies which are not included in the above table which cover the following areas:

- 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

6.7 The Area of Focus policies cover areas in the city which are expected to go through changes over the plan period resulting from new development and where the Local Plan seeks to set out particular considerations in relation to urban design, the wider environment, movement and key infrastructure that might be needed. These areas are not development sites as such, so the criteria for individual site appraisal cannot be applied.

6.8 Because of the size of the areas there is a lot of variation within them as to what the scores would be, so detailed sites appraisal would not be meaningful. The Area of Focus policies also set out how the general policies of the plan can be met in a coordinated way across these areas. The policies therefore cover a broader array of considerations than the policies discussed in Table 6.1 above. They also do not set specific requirements for what development should come forward in the same way as a site allocation (as addressed in Table 6.2), and are not site allocations themselves, but reflect areas where there are several site allocations. They are therefore not expected to give rise to significant effects.

6.3 Overall and cumulative impacts of the Local Plan 2045

6.9 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).

6.10 Table 6.3 shows the updated whole plan appraisal which takes into account the Regulation 19 Local Plan, and draws upon the appraisals of the policies and the site allocations discussed earlier in this chapter. It also draws on relevant context from earlier in the report, including what is summarised in the scoping chapter (Chapter 3).

6.11 As well as the expected overall impacts of the Oxford Local Plan 2045 policies and site allocations; the table also touches upon the expected cumulative impacts of the Local Plan plus other relevant plans, projects and existing trends against each of the SA objectives. This is because Oxford is not an isolated island and the impact of the Local Plan can often be expected to differ when impacts of other plans, projects and trends are taken into account. It should be noted, however, that an assessment of cumulative impact is inherently more uncertain.

Table 6.3: Whole Plan appraisal including expected overall impacts of the Oxford Local Plan 2045 and cumulative impacts with other plans, projects and trends.

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 re-provision 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). - In terms of cumulative impact, 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 re-provision 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 liveable 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 neighbouring 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 (adjacent to in actuality). Separately, the Council's Source Pathway Receptor Analysis and Habitats Regulations Assessment have also identified

SA/SEA topic	Overall impact	Cumulative impact	Appraisal comments
			potential sites that could 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 visitor 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.

6.12 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 re-provision 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 retrofitting 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;

6.13 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.

6.14 The Local Plan will have a range of impacts across the SA objectives. The plan will positively support inequalities, economic growth and local housing need (although the city's capacity means need cannot be met in full). Some impacts are varied, such as on carbon emissions, biodiversity and traffic where the Local Plan's policies make positive contributions through the requirements of its policies (e.g. net zero development, renewable energy generation, ecological enhancements, supporting more people to live closer to work and in accessible locations), whilst being unable to avoid some impacts of new development. The impact on water is expected to be negative, predominantly due to additional demands on water resources arising from population growth, although the Local Plan's policies seek to mitigate this as far as they can.

6.15 Some negative impacts have been reduced where mitigation has been built into the policy framework, this is discussed further in chapter 7. The mitigations built into the Local Plan mean some impacts against the objectives are ultimately neutralised, as is the case under green infrastructure and services/facilities. Some negative impacts are not able to be fully mitigated, as is the case under water and carbon emissions for example, particularly when impacts of other plans, projects and wider trends are taken into account.

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. The chapter discusses mitigation measures that have been incorporated into the plan as it has been prepared, as well as how the Sustainability Appraisal process has helped to identify and inform mitigation measures incorporated into the site allocations.

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, with 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 re-provision 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							

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
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					D			
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	D			
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			E	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		K	N	G							
SPE17											C		C			K						D			
SPE18											C	C		C	C	K		G	E	J	M				

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
SPCW 1											C		C			K		G	E	J	M				
SPCW 2	O	O											C		C	K	N		E	J		D	D		
SPCW 3	O	O								C			C			K	N	G		J	M		D		
SPCW 4	O											C	C			K	N		E	J	M		D		
SPCW 5										C	C	C	C	C	C	K			E	J	M		D		
SPCW 6	O		H								C	C	C	C	C	K	N	G	E	J	M	D	D		
SPCW 7	O	O										C	C			K	N		E	J	M		D		
SPCW 7	O	O										C	C			K	N		E	J	M		D		
SPCW 7	O	O											C		C	K			E	J	M		D		
SPCW 8	O	O								C			C	C	C	K	N		E	J	M	D	D		
SPCW 9	O	O											C		C	K			E	J	M		D		
SPCW 10	O	O								C		C	C	C	C	K	N		E			D	D		
SPCW 11	O	O										C	C	C		K			E	J			D		
SPCW 12													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.
- Proximity to a waterbody – the assessment identifies potential negative impacts where a site is in proximity to a water body which is highlighted on a number of sites. Mitigation requirements are already built into the Local Plan through policy G2 which sets requirements for buffers to watercourses which would apply, and separate policies set requirements for mitigating impacts from pollutants (policy R5 and R8), and this was expected to be sufficient in many cases. However, where the specific context of a site indicates particular risks of impact, e.g. because an open watercourse is in close proximity to where development might be expected to come forward within a site, specific wording has been incorporated into the allocation.

7.7 Additionally, separate technical work arising from the Council’s Habitat Regulations Assessment (HRA) (which considers whether there would be likely significant effects on “European Sites” within 10km of the city) and Source Pathway Receptor Analysis (SPRA) (which looks at the SSSIs within Oxford), has informed the plan-making process. Where the HRA and SPRA have identified specific mitigation measures (for the HRA this was undertaken as part of a Stage 2 Appropriate Assessment), these mitigation measures have been included within certain specific policies and site 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,	Significant new community assets	Delivery of new services/facilities to

	cultural venues and visitor attractions		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 begins 30th January 2026. More details can be found on the website: <https://www.oxford.gov.uk/oxford-local-plan-2045>

9.2 The Local Plan is expected to be submitted for examination later in 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 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)

Resp onde nt	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	<i>“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.”</i> 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; - <i>“Restoration and protection of carbon-rich peat reserves that have already been degraded by historic development in the city.”</i>	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; <i>“There will be residual risks of flooding after applying the Sequential approach Test to locating development and incorporating flood defence measures.”</i>	Background paper amended.
EA	It is stated in Topic Paper 9 that; <i>“Oxford has seen significant industrial change to the present day in fact Oxford’s industrial</i>	Background paper amended.

	<i>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.</i>	
EA	In Topic Paper 14, under the issues for the Local Plan to address, the last bullet point should read; <i>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.</i> 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.	<i>For reference, Table 5.1 is now Table 3.3 in Reg 19 version of this report.</i> 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.	<i>For reference, Table 6.1 is now Table 3.4 in Reg 19 version of this report.</i> 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 section 1.3. 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: <u>“Does development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historical, archaeological, artistic and/or architectural interests features?”</u>	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 <u>heritage</u> impacts of new development proposed in the plan <u>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.</u>” - 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 <u>associated with new sites and the intensification of existing sites</u> does not adversely affect <u>the significance of</u> heritage assets, important townscape features and local character.”	<i>For reference, Table 5.1 is now Table 3.3 in Reg 19 version of this report.</i> 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.	<i>For reference, Table 6.1 is now Table 3.4 in Reg 19 version of this report.</i> 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.	<i>Table 6.12 now Table 3.15 in updated draft in the updated version of the report.</i> 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 cumulative 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	

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 significant 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	+/- Potentially meets more of the student housing need but this	+/- Potentially meets more of the student housing need (and slightly more than	+/- Potentially allows more student accommodation to come forward and	+/- Potentially means not meeting full student housing need but would	Essentially it is a balance between opening up more sites to meet specialist housing

a decent affordable home.	would be balanced out against not meeting/losing housing provision for other housing need.	option a) but this would be balanced out against not meeting/losing housing provision for other housing need.	meet needs, but would likely be competing with meeting other housing needs which might not be met as a result.	ensure other housing needs outside campus sites is not lost to student accommodation.	need (students) and restricting it to 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	+ Depends upon implementation, most locations will be accessible to public transport/active travel (potentially not all of the student	- 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.	

	accommodation sites)	accommodation sites)			
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	N/A	N/A	N/A	N/A	

knowledge-based economy and the 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	N/A	N/A	N/A	

opportunity to live in a decent affordable home.				
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	+ 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	0	

	to electric systems this will have some limited positive impacts in helping to reduce this source of pollution.	to electric systems this will have some limited positive impacts in 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	N/A	N/A	N/A	

culture/leisure/ visitor sector.				

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	+	-	+	+/-?	Low car standards mean that applicants will need to give proper and adequate

layout, and minimise the use of greenfield and Green Belt land.					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), 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).	0	0	0	
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	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.

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.	+	-	+	+/-?	Low car would achieve significant reductions in car parking (and transport emissions/congestion). Parking standards would be county standards, which would result in more car parking for resi, but for non-resi, impact is less certain, as car free would have positive impact, but applicants could justify higher levels of provision (so it depends upon implementation).
9. To achieve water quality targets and manage water resources.	N/A	N/A	N/A	N/A	
10. To conserve and enhance Oxford's biodiversity .	N/A	N/A	N/A	N/A	Depends upon implementation, less land used for car parking may have benefits if the space is used for more greening/biodiversity.
11. To promote good urban	+	-	+	+/-?	Low car standards mean that applicants

design through the protection and enhancement of the historic environment and heritage assets while respecting local character and context and promoting innovation.					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 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	0	

			complex and uncertain. It will also depend upon implementation and the specifics of the site.		

Conclusions/potential mitigation needed

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

Appraisal of policy options for Protection of GI network and green features (updated from Policy Options set 005a)

The following options were considered (see Reg. 18 Background Paper 005: Green Infrastructure and Biodiversity for further details) in developing draft policy G1:

- **Option a:** Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere). (Core)
- **Option b:** Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in exceptional circumstances, to permitting development with re-provision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy. (Core + Supporting)

- **Option c:** In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecological sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.
- **Option d:** Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.
- **Option e:** Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be re-provided.
- **Option f:** Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.

For the purposes of this appraisal, the Council has considered what the preferred approach at Regulation 18 would look like in practice where this related to protection of a hierarchy of green spaces and appraised two options which relate to the extent of protection that would be afforded to green spaces within the network.

- **Option a*** - Protect a limited network of green spaces from any and all development through local policy (core spaces). Allow remaining green spaces to be developed in line with national policy.
- **Option b*** - Protect a limited network of green spaces from any and all development through local policy (core spaces) AND 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 re-provision (supporting spaces). Allow remaining green spaces to be developed in line with national policy.

**Land with intrinsic constraints e.g. flood zone 3b, national ecological/heritage designations would be protected regardless of option.*

SA objective	Option a*	Option b*	Additional Remarks
1. To achieve the city's ambition to reach net zero carbon emissions by 2040.	0	0	
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.	-	0	
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.	+/-	0	
6. To provide accessible essential services and facilities.	0	0	
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	0	0	

need to travel by car/ lorry.			
9. To achieve water quality targets and manage water resources.	-	0	
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.	?	0	
12. To achieve sustainable inclusive economic growth , including the development and expansion	0	0	

of a diverse and knowledge-based economy and the culture/leisure/visitor sector.			

Conclusions/potential mitigation needed

Option 2* (protection of the Core and Supporting GI Network) represents the draft policy approach (Policy G1) consulted on at Reg 18 (summer 2025). This option ensures a high level of protection for the city's most important green infrastructure assets (Core GI), while allowing development to take place where sites have been identified as part of the Supporting GI network providing any harm or loss of features is satisfactorily mitigated. The supporting GI network is made up of a number of different typologies including general public amenity space and playing fields/ pitches (associated with primary and secondary schools, the two universities (including individual Oxford colleges), and private sports facilities). Where development potential exists on sites within the supporting GI network, these spaces are typologies that could feasibly be re-provided as part of development proposals. This approach would not give rise to significant numbers of new homes, in fact any new homes that came forward would be captured sufficiently with the plan's existing windfall estimations. Broadly speaking this policy approach scores well against some of the other SA framework criteria. For instance, given the re-provision requirements of the policy in relation to SA objective 7, it is likely that this approach would give rise to minor positive benefits for green infrastructure, which may have been lost without this additional protection.

Option 1 (protection of the Core GI network) would ensure a high level of protection for the city's most important green spaces only (some of which already receive intrinsic protection by virtue of their location in flood zone 3b, or because they also benefit from national ecological or heritage designations). The absence of a local designation for supporting green spaces (and associated green space re-provision requirements) would only be likely to have a marginal effect on housing delivery. This is due other factors including national planning policy for open space (including playing fields and formal play spaces). Removing the supporting GI network designation from the plan would at best have a marginal effect on housing delivery (any homes delivered would be picked up through the housing windfall allowance). However, the removal a tier of protection from

the green infrastructure network, would have a range of likely negative effects including on SA objective “inequalities”. This is because some supporting GI is located in areas of the city with known open space inequalities. Reducing open space in these parts, of the city, in the absence of policy protection for the supporting GI network, would potentially worsen inequalities in these areas the city.

On balance, given the marginal effects on housing delivery of removing the Supporting GI tier of the Green Infrastructure Network, and the raft of minor negative effects identified in the Table above, Option 2 (which provides a local policy designations for both Core and Supporting GI) has been taken forward in the Reg. 19 Plan.

Sustainability Appraisal Appendix C - Regulation 19 stage site assessment forms incorporating sustainability appraisal

Contents

SPN1: Diamond Place and Ewert House	1
SPN2: Elsfield Hall, Elsfield Way	8
SPN3: Oxford North Remaining Phases.....	14
SPN4: Oxford University Press Sports Ground	21
SPN5: Pear Tree Farm	28
SPN6: Red Barn Farm.....	35
SPS1: 474 Cowley Road.....	42
SPS2: ARC Oxford	49
SPS3: Bertie Place Recreation Ground.....	55
SPS4: Cowley Marsh Depot	62
SPS5: Crescent Hall.....	68
SPS6: Former Iffley Mead Playing Field	74
SPS7: Kassam Stadium	80
SPS8: Land at Meadow Lane	87
SPS9: Littlemore Mental Health Centre, Sandford Road	94
SPS10: MINI Plant Oxford	100
SPS11: Overflow Carpark at Kassam Stadium	107
SPS12: Oxford Science Park	114
SPS13: Ozone Leisure Park and Minchery Farmhouse.....	121
SPS14: Redbridge Paddock.....	128
SPS15: Sandy Lane Recreation Ground.....	135
SPS16: Templars Square	142
SPS17: Unipart	149
SPE1: Churchill Hospital	156
SPE2: East Oxford Bowls Club	163
SPE3: Government Buildings and Harcourt House.....	169

SPE4: Jesus College Sports Area	176
SPE5: John Radcliffe Hospital	183
SPE6: Land Surrounding St Clement;s Church	190
SPE7: Lincoln College Sports Ground	197
SPE8: Manzil Way Resource Centre	204
SPE9: Marston Paddock Extension	210
SPE10: Nuffield Orthopaedic Centre (NOC)	216
SPE11: Oxford Brookes Marston Road Campus	222
SPE12: Rectory Centre	230
SPE13: Ruskin Campus	237
SPE14: Ruskin Field	243
SPE15: Slade House.....	250
SPE16: Thornhill Park (Phase 2).....	257
SPE17: Union Street Car Park.....	264
SPE18: Warneford Hospital	270
SPCW1: Banbury Road University Sites – Parcel B	277
SPCW2: Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel	284
SPCW3: Canalside Land, Jericho	291
SPCW4: Faculty of Music.....	298
SPCW5: Jowett Walk (South).....	305
SPCW6: Manor Place	311
SPCW7: Nuffield Sites (Island site)	318
SPCW7: Nuffield Sites (Worcester Street Car Park).....	324
SPCW7: Nuffield Sites (Land south of Frideswide Square)	330
SPCW8: Osney Mead	331
SPCW9: Oxford Railway Station and Becket Street Car Park	338
SPCW10: Oxpens.....	345
SPCW11: St Thomas School and Osney Warehouse	352

SPCW12: West Wellington Square	359

SPN1: Diamond Place and Ewert House

Site name	Diamond Place and Ewert House
SHLAA reference (and OLP2036 Policy if applicable)	018 Policy SP6
Ward	Summertown
Total site size (ha)	1.73 ha
Existing use(s)	Oxford City Council and University of Oxford owned public car park, offices and academic uses.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	An Outline Strategic Business Case has been prepared by one of the landowners (City Council) who consider that it is possible to bring forward a viable scheme. OUD, as the development agency arm of the University of Oxford, are keen to explore the site's development potential and have an ambition to provide some student accommodation. The University will need to find alternative accommodation for the Examination Building. In order to maximise the public benefits of this scheme, it will be important to undertake a comprehensive redevelopment of the site involving both key landowners, so the timing, phasing and mechanism for partnership working will be key to its delivery.
Does the landowner specify types of development	Housing both market and affordable, student accommodation, replacement community hall and potentially a new health / medical centre. Possibly retention of some element of car parking.

Stage 1b conclusion
Consider allocation of the site for a mixed-use development, principally housing and student accommodation. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 <i>(Patches of surface water flood risk present within site, including a larger patch over the existing car park)</i>
Flooding of land surrounding site for access/ egress	0	There is safe access/ egress from the site – area surrounding site is in Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land (with buildings in use on site) and includes a car park.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site is allocated for at least 135 dwellings (or if delivered as non-self-contained student accommodation, the equivalent number of rooms when the relevant ratio is applied).
Affordable housing provision	I	Depends on implementation (if delivered as dwellings where the site is likely to be policy compliant and deliver 40% affordable housing or if delivered as self-contained student accommodation).

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 95% of neighbourhoods in England – IMD 2025).

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.

Criteria	SA rating	Comments
Community facilities	I	Depends on implementation. A replacement community centre will be required if the existing community centre is demolished. The allocation also allows for healthcare facilities and town centre supporting uses including additional shops/cafes/services/ Class E uses.

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?

Criteria	SA rating	Comments
Public open space	+	Site allocated for housing – 10% public open space provided on site but could potentially be more depending on how the scheme evolves/ design.

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?

Criteria	SA rating	Comments

Sustainable transport links (bus stop)	+	Site is 200m away from Banbury Road bus stops, which are very well served with numerous frequent buses including the 2, 2A, 700, S4 gold and S5 gold.
Sustainable transport links (rail station)	-	More than 1600m from the nearest rail station (Oxford and Oxford Parkway are equidistant from the site).
Primary Schools	-	More than 800m from the nearest primary school (St Aloysius Catholic Primary School is 1300m away).
Secondary Schools	+	Less than 800m from the nearest secondary school (Cherwell School is 400m away).
GP Surgeries	+	Less than 800m from the nearest GP surgery (Summertown Health Centre is 350m away).
Post office	-	More than 800m from the nearest post office (Kendall Crescent and St Giles on Woodstock Road are both 2100m away).
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Potential protected species constraints are likely limited to roosting bats in existing buildings. The school fields east of the site are well connected to the wider landscape via hedgerows. There would be an opportunity to deliver meaningful ecological enhancements through habitat creation in the east of the allocation site.

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?

Criteria	SA rating	Comments
Archaeology	-	There is high potential for archaeological interest as the site is adjacent to an area of cropmarks of Prehistoric or Roman era.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register.
Listed Buildings	-	The Grade II listed Diamond Cottages sit near to the site, between Ferry Leisure Centre and the Banbury Road. At present, the cottages are characterised by their back-land feel and their backdrop is already of significantly larger-scale and more modern developments. There is some potential for the backdrop to be enhanced.
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	The redevelopment of the site is principally for housing and student accommodation. While it would involve the loss of some Ewert House, Examination Building and some offices, the majority of which are associated with the University of Oxford. As the loss of the University-associated buildings are likely to form part of a wider estate strategy, it is unlikely that there will be direct losses of jobs associated with the knowledge economy resulting from this redevelopment. As such, there is likely to be no change these jobs within the city.
Diversifying the economy	I	Depends on implementation. The redevelopment of the site would provide opportunities for skills and training programmes to be

end employment opportunities		introduced associated with the construction of the new development, and provide some other jobs linked to the service sector / retail, cafes, and subject to viability, a new medical centre.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, principally via Diamond Place or Ewert Place and potentially other options depending on scheme that comes forward.
Can walking and cycling connections with the surrounding area be achieved?	Yes, there is an opportunity to significantly improve walking and cycling through the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There is a change in ground level from north to south between the two principal car parks. Site contains trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees within the site and adjacent to it will influence the developable area of site and its capacity.
Are land contamination issues likely?	No known contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The relationship between the development site and the nearby listed buildings (Diamond Cottages), needs to be carefully considered.

Stage 2 conclusion
There are no significant conflicts with national policy or environmental or physical constraints to the development of this site, although potential heritage sensitivities such as the archaeological potential of the site and nearby Listed Buildings will need to be considered. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN2: Elsfield Hall, Elsfield Way

Site name	Elsfield Hall, Elsfield Way
SHLAA reference (and OLP2036 Policy if applicable)	20b2
Ward	Cuttleslowe
Total site size (ha)	0.39ha
Existing use(s)	Vacant – formerly in use as an office.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes- residential

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Very small patches of surface water flood risk adjacent to the northern and western boundaries of the site.)
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	+	Building on site are vacant.
Green belt?	0	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?

Criteria	SA rating	Comments
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	+	Site provides up to 40% affordable housing

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	<i>It is unlikely community facilities will change.</i>

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?

Criteria	SA rating	Comments
Public open space	0	Site not allocated OR amount of public open space remains the same due to the allocation

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Within 400m of 'Harefields' bus stops on Banbury Rd. Served by service no. 2, 2A, 24, 700, S4, S5, S7, X4</i>
Sustainable transport links (rail station)	-	<i>1.8km from Oxford Parkway Station</i>
Primary Schools	+	<i>Cotteslowe Primary School less than 800m away (via pedestrian/cycle bridge over A40 Elsfield Way).</i>
Secondary Schools	-	<i>Cherwell School over 800m from site</i>
GP Surgeries	-	<i>Banbury Road Medical Centre, Summertown Health Centre both over 800m from site.</i>
Post office	+	<i>Kendall Crescent post office located within 250m of the site</i>
Air Quality	-	<i>Site is located within an Air Quality Management Area and is within 150m of an air quality hotspot: Cotteslowe Roundabout.</i>

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?

Criteria	SA rating	Comments
Water	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature designations but Kendall Crescent Amenity Green Space lies to the west of site and there is potential to improve wildlife linkages or habitat continuity.

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?

Criteria	SA rating	Comments
Archaeology	0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments

Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

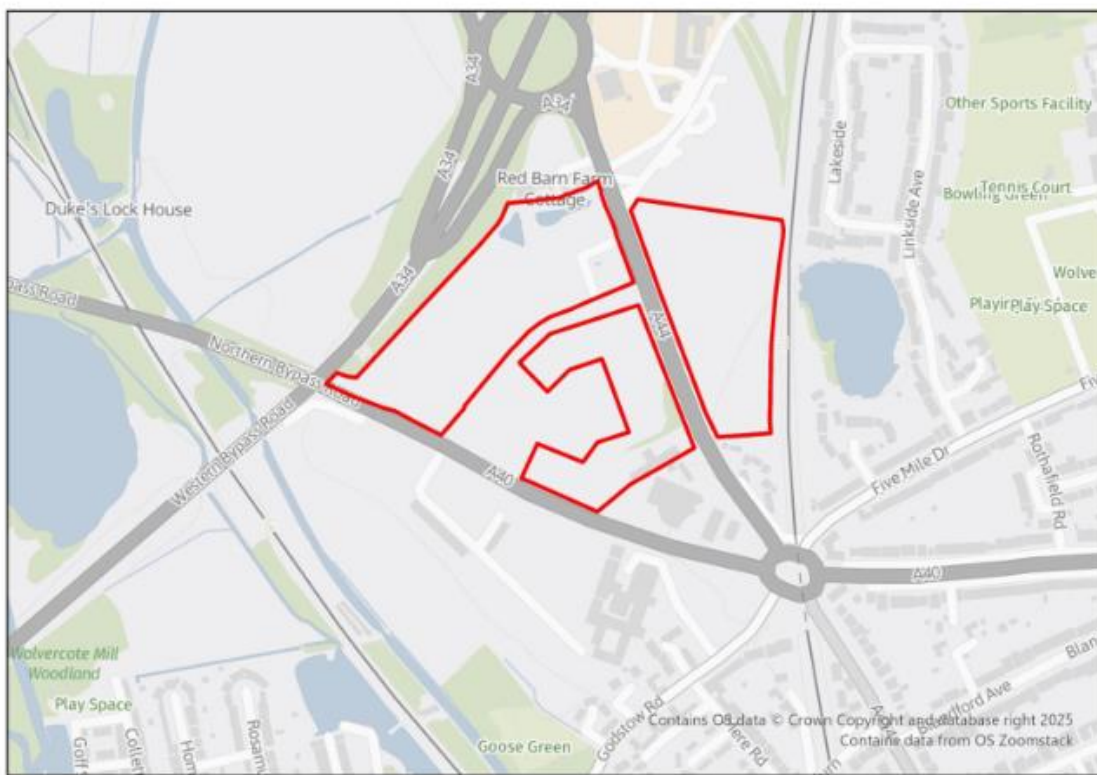
Can access for vehicles be achieved?	Yes, existing vehicular access from Harefield Road.
Can walking and cycling connections with the surrounding area be achieved?	Yes, via Harefield's Road
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Will require contamination site investigation if not already completed.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is located within a residential area but the A40, Elsfield Way is immediately to the south of the site and there may be traffic noise.

Stage 2 conclusion
No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN3: Oxford North Remaining Phases

Site name	Oxford North remaining phases
SHLAA reference (and OLP2036 Policy if applicable)	001a1
Ward	Wolvercote
Total site size (ha)	13.28
Existing use(s)	Part under construction, part greenfield

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Site has outline permission (as part of wider Oxford North development). Earlier phases on adjoining sites have built out, and some parts have reserved matters permissions. Hybrid permission for (18/02065/OUTFUL) for 480 homes and up to 87,300m² employment and also (21/01053/RES), (22/00081/RES), (22/00675/RES) and (24/00411/VAR).

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner confirmed (2025) intention to develop rest of site for mixed use including residential and R&D.
Does the landowner specify types of development	Hybrid outline permission sets out mix of uses, primarily employment and residential.

Stage 1b conclusion
Continue to next stage of assessment, site allocation will help to ensure remaining (non-commenced) phases are delivered in a sustainable and comprehensive way.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 Patches of surface water flood risk present, particularly towards the northern part of the site.
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – majority of land surrounding site is in Flood Zone 1.

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Previously developed land?	-	Part under construction and parts are unprotected open space.
Green belt?	0	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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Housing provision	++	Site is due to deliver at least the remaining new homes, as set out in outline permission.
Affordable housing provision	+	Residential phases expected to deliver affordable housing.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	+	S106 for the outline permission sets out that the wider Oxford North development, within which this site falls, will pay contributions to expanding nearby facilities such as a Primary School in Wolvercote.

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?

Criteria	SA rating	Comments
Public open space	++	Public open space will be provided onsite at the higher level of 15%

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	< 400m from a bus stop (S2, and 300 at Peartree Park & Ride)

Sustainable transport links (rail station)	-	> 1600m from train station (Oxford Parkway)
Primary Schools	-	1100m to Wolvercote Primary School
Secondary Schools	-	>800m from the nearest secondary school with spaces
GP Surgeries	-	1500m to Wolvercote GP surgery
Post office	-	>800m from the nearest post office (Summertown)
Air Quality	-	Whole city is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	--	Site contains two balancing ponds

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Remaining phases are 1km from Oxford Meadows SAC or SSSI. Small corner on western edge of the parcel on west of A44, and strip running down eastern boundary of the parcel to east of A44, is identified in the LNRS.

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?

Criteria	SA rating	Comments
Archaeology	0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Conservation Areas & Register of	-	None within the site, but close to Wolvercote Conservation Area designation so potential impacts on setting.

Parks and Gardens (RPG)		
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	Site will support growth in knowledge-based economy
Diversifying the economy and employment opportunities	+	Commercial phase of site will likely provide affordable workspace

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes - access via A44 and A40, new link road within site has also already been constructed.
Can walking and cycling connections with the surrounding area be achieved?	Yes - Area is well connected to pedestrian and cycle routes into Oxford and surrounding area, and improvements being delivered as part of S106.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Two balancing ponds delivered already through earlier phases.
Are land contamination issues likely?	Contamination risks being addressed under current planning permission.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Eastern parcel adjoins railway line, which may have noise implications for the proposed residential on that parcel.

Stage 2 conclusion
Site is generally sustainable. Site has outline permission, and parts have reserved matters permissions. Site should be considered further for allocation which will help to ensure remaining (non-commenced) phases are delivered in a sustainable and comprehensive way. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN4: Oxford University Press Sports Ground

Site name	Oxford University Press Sports Ground
SHLAA reference (and OLP2036 Policy if applicable)	049 Policy SP52
Ward	Wolvercote
Total site size (ha)	3.65
Existing use(s)	Private sports ground

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has indicated a willingness to develop the site.
Does the landowner specify types of development	Housing and public open space

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Large patch of surface water flood risk along the upper side of the eastern perimeter, with small patches along the southern perimeter.)
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is unprotected open space (private sports ground) including a cricket pitch and three tennis courts. Part of the Green Infrastructure Network (supporting).
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site would provide more than 10 new homes. (Site allocation in Oxford Local Plan 2036 is for a minimum of 130 homes, depending on relocation of the cricket pitch).
Affordable housing provision	+	Site likely to deliver affordable housing

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.

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities

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?

Criteria	SA rating	Comments
Public open space	+	Site allocated for housing – 10% public open space to be provided on site

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	The site is 400m from the nearest bus stop (Jordan Hill on Banbury Road). Buses along Banbury Road are frequent and include the 2, 2A, 700, S5 and S7.
Sustainable transport links (rail station)	+	Less than 1600m from the nearest rail station (Oxford Parkway is 1500m away)
Primary Schools	-	More than 800m from the nearest primary school (Wolvercote Primary School)
Secondary Schools	-	More than 800m from the nearest secondary school (Cherwell School)
GP Surgeries	-	More than 800m from the nearest GP surgery (Wolvercote Surgery)
Post office	-	More than 800m from the nearest post office (Kendall Crescent)
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Aerial imagery indicates the site is comprised of grassland used for recreational purposes (cricket pitch), developed land, and boundary hedgerows/tree lines. It forms part of a wider block of semi-natural habitats incorporating the golf course to the north, and the lake and cemetery to the south. As such, it may act as a green corridor in the landscape, potentially for nesting birds, foraging and commuting bats, badgers, reptiles, and amphibians. Any development proposals should assess what connectivity is provided and preserve. Any of the faunal groups identified above could also provide constraints within the application site itself.

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?

Criteria	SA rating	Comments
Archaeology	-	General potential for Roman and prehistoric activity and specific interest for proximity to Lower Palaeolithic Wolvercote Channel
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the Register of Parks and Gardens
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs/economic floorspace in knowledge-based economy</i>
Diversifying the economy and employment opportunities	0	<i>No change in employment base or access to affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is accessible by vehicle from Jordan Hill.
Can walking and cycling connections with the surrounding area be achieved?	Pedestrian and cycle connections from Jordan Hill via Banbury Road.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The existing use is as a private sports ground. There are limited physical features/ changes in ground level etc. Site contains significant existing trees along the northern and western boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the Oxford City Council Jordan Hill Road (No.1) Tree Preservation Order 1981 and the Cherwell District Council (No.1) Tree Preservation Order, 1982. Existing trees will influence the developable area of the site and its capacity.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The adjacent business park is in use for science, technology, innovation and offices, so the potential for noise nuisance to impact residential uses on the development site would be low.

Stage 2 conclusion

The site scores quite well overall against the sustainability criteria and although the scoring for accessing local services such as schools and GP surgeries is low, there is good access to sustainable transport links which are in close proximity to the site.
Site to be put forward for allocation in Regulation 19 Local Plan.

SPN5: Pear Tree Farm

Site name	Pear Tree Farm
SHLAA reference (and OLP2036 Policy if applicable)	001e
Ward	Wolvercote
Total site size (ha)	2.54
Existing use(s)	Greenfield / farmland, including farm buildings

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of the site's potential inclusion within this land. The Direction (19 November 2025) maps suggest that part of the eastern boundary of the site is included within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner confirmed intention (confirmed 2025) to develop the site for residential-led development, as part of wider scheme with the parcel of land to the north (in Cherwell district).

Stage 1b conclusion
Landowner has confirmed intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site in Flood Zone 1 Some small patches of surface water flooding.
Flooding of land surrounding site for access/ egress	0	Surrounding area in Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is unprotected open space plus some farm buildings
Green belt?	0	Site is not on Green Belt land (de-designated in previous local plan)

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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for residential development (in Northern Gateway AAP) and would provide more than 10 new homes
Affordable housing provision	+	No known viability challenges. Site would likely provide up to 50% affordable housing

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.*

Criteria	SA rating	Comments
Regeneration area (within	0	Site is not in or adjacent to a regeneration area (2025 data)

the top 20% most deprived areas IMD)		

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*.

Criteria	SA rating	Comments
Community facilities	0	No change

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?

Criteria	SA rating	Comments
Public open space	+	Allocated for residential, so public open space will be required to be provided onsite. The type and layout of this could take the form of wilder, natural areas that are more informal in design and can play a dual role in allowing people to get closer to nature, whilst also supporting existing species. Onsite open space could also help with maintaining the UGF score and for supporting biodiversity.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	Approximately 500m from a bus stop (S2 or Park & Ride 300)
Sustainable transport links (rail station)	-	> 1600m from train station (Oxford Parkway). Station is relatively close but the pedestrian/cycle access is longer due to site being severed by the railway line.

Primary Schools	-	>800m from Wolvercote Primary School
Secondary Schools	-	>800m from the nearest secondary school with spaces
GP Surgeries	-	>800m Wolvercote GP surgery
Post office	-	>800m from the nearest post office (Summertown)
Air Quality	-	Whole city is within an Air Quality Management Area (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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Water	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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Ecology and Biodiversity	+	No nature conservation designations on site, although majority of site falls within the LNRS and there is substantial tree coverage on site.

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Archaeology	0	Background Roman and Bronze Age sites to east and west but not close by, sizable development would require evaluation in relation to general potential.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint

View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access to the site is a constraint as the current single-lane track would not be suitable for this development in its current form. An alternative access would be required.
Can walking and cycling connections with the surrounding area be achieved?	Current access is single lane track to the A44. As site adjoins railway line and proximity to Oxford Parkway, there is potential to improve pedestrian/cycle access to station.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Substantial tree coverage on site Telephone mast which would constrain development if required to be retained.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Railway line and A34 adjoins site, likely to need buffers & screening for noise for residential uses

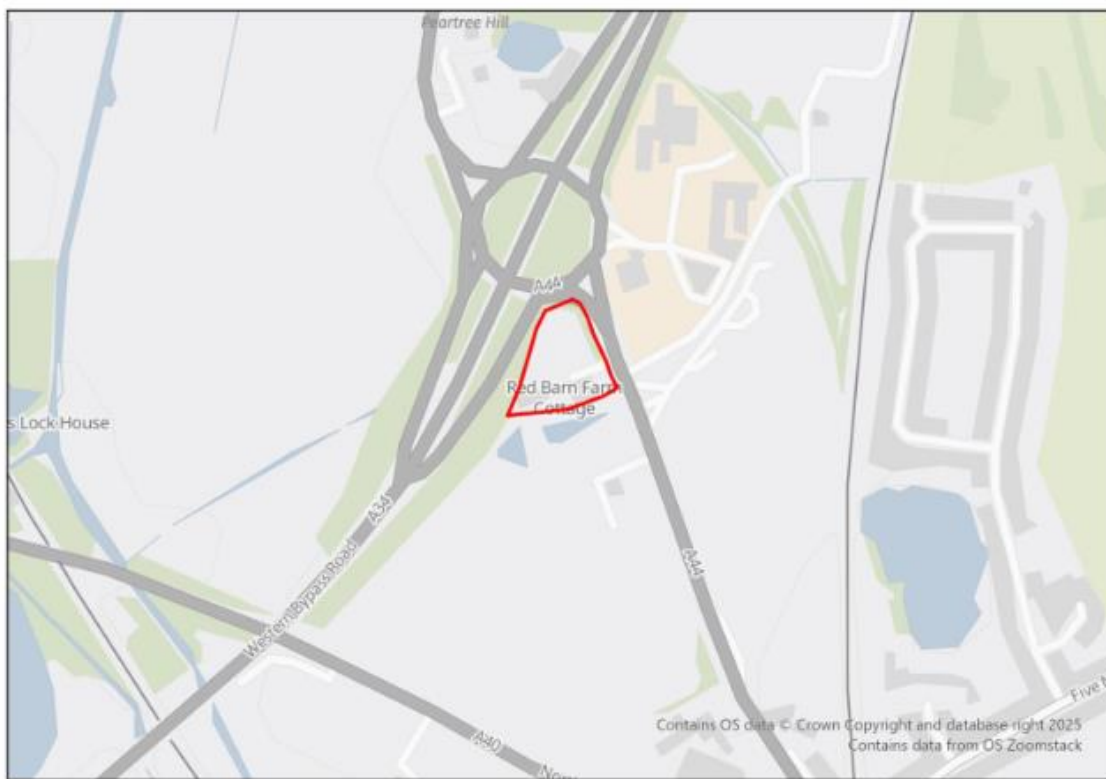
Stage 2 conclusion

Site is generally sustainable as a site allocation for residential development. Access road for vehicles & pedestrians needs addressing as the current single-lane track would not be suitable for this development in its current form. Additionally the site adjoins the A34 and railway line so mitigation may be required to minimise noise impacts on new residents. Site to be put forward for allocation in Regulation 19 Local Plan.

SPN6: Red Barn Farm

Site name	Red Barn Farm
SHLAA reference (and OLP2036 Policy if applicable)	001c
Ward	Wolvercote
Total site size (ha)	0.96
Existing use(s)	Classroom/workshop/office buildings and a motorcross track

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner confirmed (2025) intention to develop for economic
Does the landowner specify types of development	Economic development (knowledge economy)

Stage 1b conclusion
Landowner has confirmed (2025) intention to develop for employment (R&D/knowledge economy). Continue to next stage of assessment.

Stage 2 assessment – Qualitative assessment of deliverability (incorporating Sustainability Appraisal)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Southern portion of the site is impacted by surface water flood risk).
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is mostly previously developed land (with buildings in use on site), the track part is grass/soil
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	0	Site allocated for use other than housing
Affordable housing provision	0	Site allocated for use other than housing

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	I	Development of the site could lead to decrease in community/training facilities unless these are appropriately reprovided. Will depend upon 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?

Criteria	SA rating	Comments
Public open space	I	Development for employment would provide some landscaping. Policy suggests that design of outdoor spaces could seek to incorporate a variety of features including pocket parks; trees and hedges; green roofs; as well as linear features that can facilitate movement through the site and integrate with surrounding areas.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	< 400m from a bus stop, service S2 and the Peartree Park & Ride (300)
Sustainable transport links (rail station)	-	> 1600m from train station (Oxford Parkway)
Primary Schools	-	1100m to Wolvercote Primary School
Secondary Schools	-	>800m from the nearest secondary school
GP Surgeries	-	1500m to Wolvercote GP surgery
Post office	-	>800m from the nearest post office (Summertown)
Air Quality	-	Whole city is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	-	Site is within 30m of a water body (balancing ponds within the adjoining Oxford North development)

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	No nature conservation designations on the site, but there is substantial tree coverage around perimeter. Policy suggests Trees could be retained especially along perimeter with A34 to help buffer noise. There may be potential to improve habitat provision through enhancement of the remaining green space which is currently unlikely to provide much in ecological terms.

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: Does the site contain any historical, or archaeological features?

Criteria	SA rating	Comments
Archaeology	I	Site contains no known archaeological sites but Roman remains recorded in the general area, site would require evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	++	Development of site for employment would support jobs in knowledge-based economy, as part of the wider Northern Gateway area. Policy specifies that employment uses on the site must be linked to knowledge economy.
Diversifying the economy and employment opportunities	+	Likely to provide affordable workspace as part of development (

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Current vehicle access onto the A44 is unlikely to be suitable for any significant increase in traffic without upgrading. Any plans for a left-in left-out junction would need to be agreed with the Highways Authority, or low-car development could be an option given the proximity of park & ride.
Can walking and cycling connections with the surrounding area be achieved?	Generally area is well connected to pedestrian and cycle routes into Oxford and surrounding area.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Nearby balancing ponds on adjoining site. Substantial tree coverage around perimeter of site could be retained as buffer to traffic of A34/A44 which adjoin the site on two sides at raised levels.
Are land contamination issues likely?	Land contamination issues are unlikely given the current use.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Noise from adjoining A34/A44, which are also at raised levels, orientation of buildings could help mitigate this.

Stage 2 conclusion
Site allocation for employment generally scores well against sustainability objectives, the main negative scores relate to access to schools, GP etc which are less significant to development for employment compared to if the site were being developed for residential. The existing community facilities on the site are important to local young people so whilst the area is suitable for redevelopment, the loss of this community facility needs to be addressed and mitigated as part of any redevelopment. Employment use would complement the adjoining Oxford North development. Vehicle access needs to be addressed, because the current access

onto the A44 is unlikely to be suitable for any significant increase in traffic. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS1: 474 Cowley Road

Site name	474 Cowley Road
SHLAA reference (and OLP2036 Policy if applicable)	516
Ward	Donnington
Total site size (ha)	0.34ha
Existing use(s)	Former use as a commercial timber yard, now vacant.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning application 17/01463/FUL for construction of a 64-bed care home not implemented.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Residential development. Planning permission was granted in September 2017 for the demolition of the existing buildings on the site and erection of a 64-bedroom care home, along with landscaping and car parking facilities (17/01463/FUL). Development was not implemented and the site remains available.

Stage 1b conclusion
Consider further for allocation for residential development, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 3a <i>(Large patches of surface water flood risk within central and northern areas of site).</i>

Flooding of land surrounding site for access/ egress	-	Access immediately from the site, for a short duration in either direction of Cowley Road lies within Flood Zone 3a, after which the access lies within Flood Zone 1.

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?

Criteria	SA rating	Comments
Previously developed land?	+	The site will make use of previously developed land (with vacant buildings on site).
Green belt?	0	The 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?

Criteria	SA rating	Comments
Housing provision	++	Site will deliver at least 20 homes.
Affordable housing provision	+	Affordable housing likely to be policy compliant.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not within one of the most deprived areas of Oxford.

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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities.

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?

Criteria	SA rating	Comments
Public open space	0	No change.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m to the nearest bus stop. There are frequent services on the 1, 5A City, 5 City, 10 etc.
Sustainable transport links (rail station)	-	>1,600m to Oxford Train Station.
Primary Schools	+	<800m to the nearest primary school (St Frideswide Primary School).
Secondary Schools	+	<800m to the nearest secondary school (Greyfriars Catholic School).
GP Surgeries	-	>800m to the nearest GP surgery
Post office	-	>800m to the nearest post office
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	0	The site does not contain and is not near a body of water.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Site is adjacent to Allotments (Elder Stubbs Charity Allotments). If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Trees along the boundary should be retained and protected. Reptiles, bats, birds, badgers and potentially invertebrates are likely present. To provide mitigation, retention and where possible enhancement of habitat suitable for reptiles along the south-western area of the site is likely required. However, this must be informed through protected species surveys.

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?

Criteria	SA rating	Comments
Archaeology	0	General potential only. Requirement for evaluation would depend on the scale of development.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is not within a conservation area.
Listed Buildings	0	The site is not within close proximity to a listed building.
View Cones	0	The site does not lie within the city's view cones.

Historic Core Area	0	The site is not within the city's High Building's 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs.
Diversifying the economy and employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site can be accessed from Cowley Road, almost opposite the junction with Gillian's Way.
Can walking and cycling connections with the surrounding area be achieved?	There are existing cycling and pedestrian connections but there is potential to significantly improve these.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant physical features identified. Site contains existing trees around and near to boundaries which are important to neighbouring residential properties. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is bounded by a residential area. To the north-west are the rear gardens of the residential properties in Milton Road and to the south is a car repair business set behind 496-510 Cowley Road.

Stage 2 conclusion

No significant constraints to development however, part of sites lies in FZ3a so will need careful design and planning. Subsequent stages in the planning process (e.g., planning application stage) likely to need to be supported by suitable site-specific FRA work. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS2: ARC Oxford

Site name	ARC Oxford
SHLAA reference (and OLP2036 Policy if applicable)	587 (SP10 – Oxford Business Park and AOC7 – Cowley Branch Line)
Ward	Cowley
Total site size (ha)	35.4 Ha
Existing use(s)	Office/ Lab/ R&D/ vacant plots

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Part	Numerous planning applications for various plots at various stages of the planning process.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, numerous planning applications at various stages of the planning process
Does the landowner specify types of development	Yes, employment uses focusing on labs/ R&D

Stage 1b conclusion
Consider further for allocation for a mix of employment uses including labs/ R&D and other appropriate Class E and B employment uses. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Patches of surface water flood risk present across site)
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>A mix of previously developed land and vacant plots</i>
Green belt?	0	<i>Site is not on Green Belt Land</i>

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?

Criteria	SA rating	Comments
Housing provision	1	<i>Depends on implementation</i>
Affordable housing provision	1	<i>Depends on Implementation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site not in or adjacent to a Regeneration area. Site within one of 40% most deprived areas (IMD – 2025)</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Community facilities likely to remain the same.</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Amount of public open space likely to remain the same although redevelopment opportunities will bring potential to improve public realm</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Numerous frequent service bus stops within the site boundary, including "The Longwall" stop on Garsington Road</i>
Sustainable transport links (rail station)	-	<i>Site more than 800m from Oxford Railway station (over 5km)</i>
Primary Schools	+	<i>Nearest Primary School is less than 800m away (Our Lady's Catholic Primary School is 550m away)</i>
Secondary Schools	-	<i>Nearest Secondary school is more than 800m away (Oxford Academy, Sandford Lane is over 2km away)</i>
GP Surgeries	+	<i>Nearest GP Surgery is less than 800m away (Temple Cowley Medical Group is 750m away)</i>
Post office	-	<i>Nearest Post Office is more than 800m away (Balfour Road is more than 1.5km away)</i>
Air Quality	-	<i>Within the city-wide AQMA. Not in proximity to a current air quality hotspot</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Site contains two small ponds</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Site not within a designated ecological site. Opportunities for improvements and enhancements through green walls/ roofs etc.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site contains potential for Roman archaeology</i>
Conservation Areas & Register of Parks and Gardens (RPG)	-	<i>Western boundary of the site is adjacent to the Temple Cowley Conservation Area</i>
Listed Buildings	-	<i>Site contains no listed building constraints, however adjacent to the western boundary of the site (Hollow Way) is the Grade II Listed Nuffield Press East Wing and Attached Former School House</i>
View Cones	0	<i>Site lies outside the city's view cones</i>
Historic Core Area	0	<i>Site lies outside the historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities	+	<i>Site likely to continue to support key knowledge-based sectors that drive economic growth</i>

in the knowledge-based economy		
Diversifying the economy and employment opportunities	+	<i>Site has potential to help deliver affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains numerous trees associated with landscaping. No Tree preservation orders on site. Site is a fairly regular shape and no significant changes in ground level.
Are land contamination issues likely?	Contamination risks possible associated with former use.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins the ring road and a residential area.

Stage 2 conclusion
No insurmountable constraints to development. Care should be taken if redeveloping buildings near the western site boundary as there is an opportunity to improve the relationship between the site and the conservation area and listed building. Air quality at Hollow Way (again at the western boundary of the site) has previously been a potential issue and it will be important to ensure that this does not persist. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS3: Bertie Place Recreation Ground

Site name	Bertie Place Recreation Ground
SHLAA reference (and OLP2036 Policy if applicable)	008a Policy SP3
Ward	Hinksey Park
Total site size (ha)	0.67ha
Existing use(s)	Recreation ground, playground, MUGA

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	Small amount (approximately 1%) of site lies within FZ3b and some of access

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning application 23/00988/FUL not yet determined. 31 units.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Planning application indicates landowner intention to develop for residential.
Does the landowner specify types of development	Residential

Stage 1b conclusion
Landowner has set out intentions through planning application. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b (Small patch of surface water flood risk towards western boundary on site)
Flooding of land surrounding	-	Access/egress from the site and immediate surroundings lies within Flood Zone 2. Part of Abingdon Road which lies in close proximity to the site is in Flood Zone 3b.

site for access/ egress		

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Previously developed land?	-	<i>Unprotected green space</i>
Green belt?	0	<i>Not Green Belt</i>

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Housing provision	++	<i>Current allocation for housing and application for 31 homes. Unlikely other uses would be proposed or would align with strategy.</i>
Affordable housing provision	+	<i>Site is subject to a live planning application for 31 affordable homes.</i>

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.*

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in or adjacent to a regeneration area</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Site not likely to deliver new community facilities.</i>

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?

Criteria	SA rating	Comments
Public open space	-	<i>Depends on how loss is compensated for, but the developable part of the site is currently a small recreation ground, multi-use games area (MUGA) and playground.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Better than 10min frequency at peaks of buses to the city centre (many of which go to Abingdon in the opposite direction) (X2, X3 and 35 most frequent). Bus stop on Abingdon Rd or Redbridge P&R both under 250m
Sustainable transport links (rail station)	-	<i>3.2km walk to Oxford Parkway Station, closest station</i>
Primary Schools	+	<i>700m to New Hinksey Primary School</i>
Secondary Schools	-	<i>2300m to Greyfriars Oxford Catholic School</i>
GP Surgeries	+	<i>c.800m walk to South Oxford Health Centre</i>
Post office	-	<i>1,500m to Donnington PO</i>
Air Quality	-	<i>Site is within Air Quality Management Area</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Within 30 m of a water body (Redbridge Stream)</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	The recreation ground appears to contain regularly managed grassland, likely of limited diversity, though the tree lines bordering the site may be of greater value. There will be few protected species considerations.

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?

Criteria	SA rating	Comments
Archaeology	0	<i>Site contains no known archaeological sites or has limited/uncertain archaeological potential</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Site is not in or on the edge of a conservation area or site on the RPG</i>
Listed Buildings	0	<i>Site contains no identified historic building constraint</i>
View Cones	0	<i>Site lies outside of a view cone</i>
Historic Core Area	0	<i>Site lies outside the City Council's designated historic core area.</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in the number of jobs/economic floorspace supporting the knowledge economy.</i>
Diversifying the economy and employment opportunities	0	<i>No change.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – road access from Bertie Place, although only potential for one route in, one route out, so site will be a cul-de-sac (for vehicles) There is pedestrian access through to the Abingdon Road and Wytham Street
Can walking and cycling connections with the surrounding area be achieved?	Yes – good pedestrian and cycling connections using National Cycle Route 5 which cuts through the site and will need to continue through the site, even if its exact location is altered
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	A number of established trees onsite, particularly around perimeter Sites contain significant existing trees and woodland which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Yes, but can be mitigated.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins existing residential development

Stage 2 conclusion
Access/egress from the site is over land in moderate flood risk so will need further investigation and mitigation is likely to be required. Re-provision of MUGA and playground will be required. No

other significant constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS4: Cowley Marsh Depot

Site name	Cowley Marsh Depot
SHLAA reference (and OLP2036 Policy if applicable)	016 Policy SP35
Ward	Temple Cowley
Total site size (ha)	1.71ha
Existing use(s)	City Council depot, storage for refuse vehicles

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Potentially in the catchment of Lye Valley SSSI

Is the site greenfield in flood zone 3b?	No	Brownfield Flood Zone 3b
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner (City Council) confirmed intention to develop, subject to alternative site for the Depot uses being found
Does the landowner specify types of development	Residential proposed

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b, plus large patches of surface water flood risk within central area of site.

Flooding of land surrounding site for access/egress	-	Majority of the land surrounding the site for access/egress lies within Flood Zone 3b (not insurmountable)

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land, with buildings in use as depot. Fairly low density so redevelopment could make more efficient use of site
Green belt?	0	Not Green Belt

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?

Criteria	SA rating	Comments
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	+	Site is allocated for residential and would be required to provide affordable housing

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities

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?

Criteria	SA rating	Comments
Public open space	+	Site allocated for housing – 10% public open space provided on site

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<100m to Marsh Road bus stop. Frequent services to Oxford City Centre eg 1, 5, 10
Sustainable transport links (rail station)	-	Approx 4400m to Oxford Rail station
Primary Schools	+	Approx 450m to St Christophers Primary School, Temple Road
Secondary Schools	-	Approx 1000m to Oxford Spires Academy, Glanville Road
GP Surgeries	+	Approx 800m to Temple Cowley Medical Group
Post office	-	Approx 1.5km to Donnington Post Office
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	-	Boundary Brook runs along eastern boundary of the site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest including roosting bats and nesting birds. Identified in LNRS as area that could help improve biodiversity (along southern boundary of site). Can improve wildlife linkages or habitat continuity from adjoining core GI site. TPO nearby Land west of Leafield Road) but not within site.

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?

Criteria	SA rating	Comments
Archaeology	0	Site contains no known archaeological sites
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or site on the RPG register
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	-	Very small part of site (northern corner) is within Crescent Road View Cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Site in existing employment use but not in knowledge-based economy. No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy and employment opportunities		While the site does support employment uses it is in use as a depot for the city council. As such, should site come forward for residential development, there are unlikely to be job losses as the city council is rationalising its estate.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Marsh Road, including for emergency vehicles
Can walking and cycling connections with the surrounding area be achieved?	Yes – via Marsh Road (and Cowley Marsh Sports field if site is opened up). There are safe, segregated surfaced pedestrian/cycle access routes across the field to the Boundary Brook nature reserve green corridor and National Cycle Route 57 which also follows along the Brook.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Hedgerow along the eastern boundary with cycle lane 2 existing dwellings on site.
Are land contamination issues likely?	Yes – former depot and fueling station
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Adjoins residential uses to the north and opposite site of Marsh Road

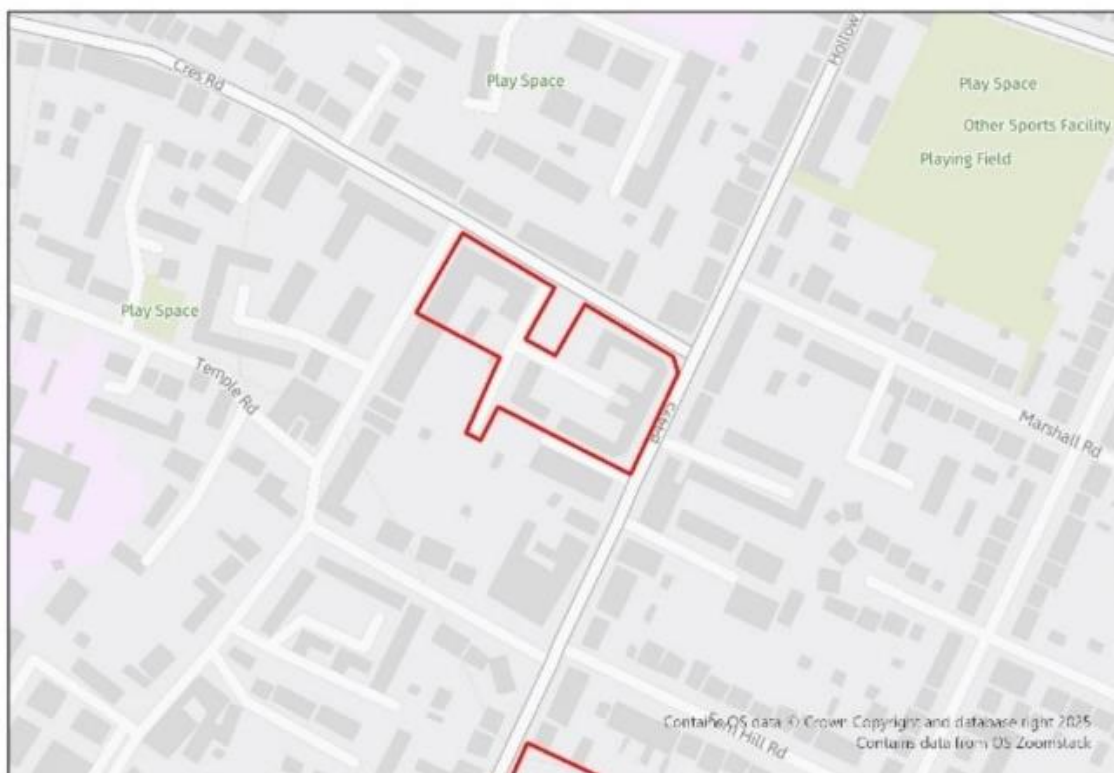
Stage 2 conclusion
The site is generally sustainable – it is on previously developed land and is an accessible location. The site is not sensitive from an ecological perspective however it lies within one of the city’s locally designated View Cones so development should be designed accordingly. The flood risk classification of the site has increased in recent years following updated Environment Agency modelling data, which will need an SFRA Level 2 assessment to explore the risks in more detail. This may impact on capacity but is not thought to be insurmountable. Finding a site to relocate the existing depot uses is

challenging so is likely to impact delivery timelines. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS5: Crescent Hall

Site name	Crescent Hall
SHLAA reference (and OLP2036 Policy if applicable)	017
Ward	Temple Cowley
Total site size (ha)	0.9
Existing use(s)	Student accommodation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	

Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	The landowner has expressed interest in further developing the site for student accommodation.
Does the landowner specify types of development	Student accommodation

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1

		<i>(Small patch of surface water flood risk towards the northern corner of the site, with a much larger patch within the south eastern half of the site, towards Hollow Way).</i>
Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is previously developed land (with buildings in use on site)</i>
Green belt?	0	<i>Site is not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Site is currently in use as student accommodation. There is the potential to increase the current number of student rooms by further developing the site, and by more than the number of student rooms that equate to 10 dwellings.</i>
Affordable housing provision	I	<i>Depends on implementation</i>

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.*

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 60% of neighbourhoods in England – IMD 2025).</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Site not allocated for community facilities</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Site not allocated</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Site is less than 400m away from a bus stop. The nearest one is the Crescent Hall bus stop on Hollow Way which is 150m away. Buses along Hollow Way are frequent and include the 10, 600 and 700.</i>
Sustainable transport links (rail station)	-	<i>Over 1600m from the nearest rail station (Oxford)</i>
Primary Schools	+	<i>Less than 800m from the nearest primary school (St Christopher's C of E Primary School is 500m away)</i>
Secondary Schools	-	<i>More than 800m from the nearest secondary school (Oxford Spire Academy)</i>

GP Surgeries	+	<i>Less than 800m from the nearest GP surgery (Hollow Way Medical Centre is 300m away)</i>
Post office	-	<i>More than 800m from the nearest post office (Woodfarm)</i>
Air Quality	-	<i>Site is within Air Quality Management Area (AQMA)</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Site is not within 30m of a water body</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Contains no nature conservation designations but has potential for protected species to be present such as roosting bats and nesting birds. Could improve wildlife linkages or habitat continuity.</i>

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?

Criteria	SA rating	Comments
Archaeology	0	<i>Site lies within a large zone of general potential for Roman Kilns and has low to moderate archaeological potential.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	-	<i>Site lies on the edge of the Temple Cowley Conservation Area</i>
Listed Buildings	0	<i>Site contains no identified historic building constraint</i>
View Cones	0	<i>Site lies outside of a view cone</i>
Historic Core Area	0	<i>Site lies outside the City Council's locally designated Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs/economic floorspace in knowledge-based economy</i>
Diversifying the economy and employment opportunities	0	<i>No change in employment base or access to affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is accessible by vehicle from Crescent Road.
Can walking and cycling connections with the surrounding area be achieved?	There are existing walking and cycle connections with the surrounding area to/ from the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees along the Crescent Road, Junction Road and Hollow Way frontages which are important to public amenity in the area and will provide valuable ecosystem services. These trees are protected by the Oxford City Council Crescent Road (No.1) Tree Preservation Order 1998. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is already in use for student accommodation, however design sensitivity would be required for further redevelopment as there are residential uses in close proximity to the site.

Stage 2 conclusion

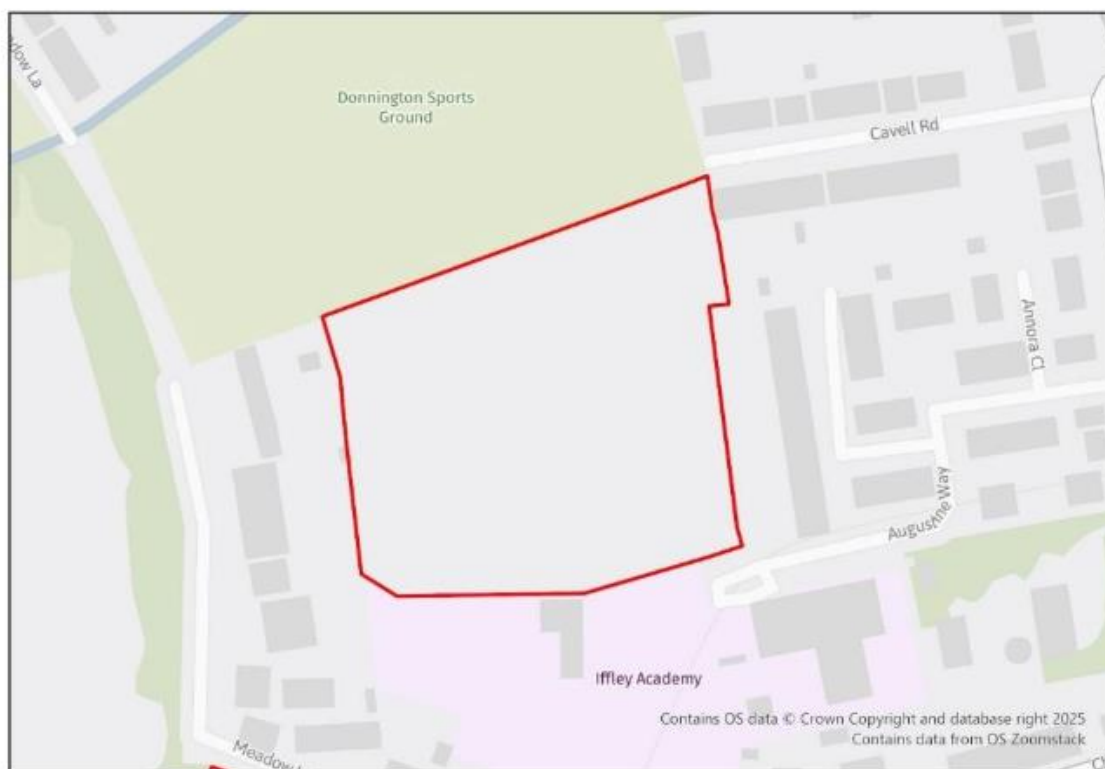
The site scores well overall against the sustainability criteria and has good access to sustainable transport links. However, design sensitivity is likely to be required due to the site's location adjacent to a conservation area.

Site to be put forward for allocation in Regulation 19 Local Plan.

SPS6: Former Iffley Mead Playing Field

Site name	Former Iffley Mead Playing Field
SHLAA reference (and OLP2036 Policy if applicable)	104 (OLP 2036 ref SP38)
Ward	Rose Hill & Iffley
Total site size (ha)	2.04
Existing use(s)	Vacant, former playing field

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	Vacant but outside flood zone
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	Outline application submitted July 25 for up to 90 homes (25/00813/OUT). Yet to be determined.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Site has been allocated for residential use in current plan, and landowner retains interest.

Stage 1b conclusion
Site does not have insurmountable obstacles to development and is suitable for allocation for residential use. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1. Very small patch of surface water flood risk on the south eastern boundary.
Flooding of land surrounding site for access/ egress	0	One of two existing access routes to the site lies within Flood Zone 1 and could potentially provide hazard free access to and from the site via Augustine Way/Iffley Turn. (Cavell Road at NE corner of site lies within Flood Zone 3).

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is vacant greenfield
Green belt?	0	

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?

Criteria	SA rating	Comments
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	+	Affordable provision will depend on policy at time of application. Current 2036 policy requires a min of 40%.

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.

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	+	<i>Site is adjacent to an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Site is allocated for residential use, although suitable complementary uses would be considered on their merits</i>

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?

Criteria	SA rating	Comments
Public open space	+	<i>Site allocated for housing, which will require min 10% public space on site.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>There are a number of bus stops within 400m of site, served by several routes towards city centre and suburbs.</i>
Sustainable transport links (rail station)	-	<i>Oxford Rail Station is approx 4km away.</i>
Primary Schools	+	<i>A number of primary schools are within 800m of site (Larkrise, St Frideswide, Greyfields). Site is also directly opposite Iffley Academy, which is a SEND specialist school.</i>

Secondary Schools	-	Site is directly opposite Iffley Academy, which is a SEND specialist school, nearest secondary schools are at least 900m away.
GP Surgeries	+	Nearest GP surgery just over 400m distance (Donnington Medical practice)
Post office	+	Nearest post office within 800m (at junction between Iffley Road/Howard Street)
Air Quality	-	Entire city is 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?

Criteria	SA rating	Comments
Water	0	Site is 350m from Thames watercourse.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	Site has no specific ecological designations, although it has been vacant for some time and mature planting is present throughout so there is potential for biodiversity value.

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?

Criteria	SA rating	Comments
Archaeology	-	The site has general archaeological potential, as it is located 70m from a Neolithic pit circle and there is potential for further remains. It also has potential for Early Saxon settlement as the Archeox excavation to the north recovered a significant amount of Saxon pottery. Any sizable development will require pre-determination evaluation (geophysical survey and trenching).
Conservation Areas & Register of	-	Site boundary adjoins Iffley CA

Parks and Gardens (RPG)		
Listed Buildings	0	No listed buildings on site.
View Cones	0	Site lies outside a view cone but there is potential for it to impact views from the Rose Hill view cone.
Historic Core Area	0	Site is not in 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Site is allocated for residential use so no implications for knowledge economy expected
Diversifying the economy and employment opportunities	0	Site is allocated solely for residential use and suitable complementary uses.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Mature planting and trees on site boundary.
Are land contamination issues likely?	Significant contamination unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is directly opposite Iffley Academy.

Stage 2 conclusion

There are a number of physical and policy constraints, however these are not considered to be insurmountable, though potential mitigations may need to be considered as part of any allocation where necessary. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS7: Kassam Stadium

Site name	Kassam Stadium
SHLAA reference (and OLP2036 Policy if applicable)	028a LP2036 Policy SP14 028c
Ward	Littlemore + Northfield Brook
Total site size (ha)	6.52 ha
Existing use(s)	Kassam football Stadium with related conference facilities, car parking, cinema, bowling, other community/leisure uses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – mixed use development including R&D (already planning permission for part of site 23/01198/FUL)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Very small area of Flood Zone 3a and 3b immediately adjacent to the brook, slightly wider area of Flood Zone 2. Patches of surface water flooding, particularly south of the stadium.

Flooding of land surrounding site for access/ egress	0	Grenoble Road nearly all free of flood risk.

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site consists of previously developed land
Green belt?	0	Site lies outside the Oxford Green Belt

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?

Criteria	SA rating	Comments
Housing provision	++	The landowner is interested in developing the site for a mix of uses including a significant amount of residential, which it is suitable for.
Affordable housing provision	+	The site is likely to include deliver of affordable housing (not suitable for student accommodation)

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most	++	Site is within a regeneration area.

deprived areas IMD)		

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.

Criteria	SA rating	Comments
Community facilities	I	Community function would be replaced, but whether there is additional or the form will depend 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?

Criteria	SA rating	Comments
Public open space	+	Site is likely to deliver additional public open space.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m to nearest bus stop outside Kassam stadium which provides 3A service every 30mins to Templars Square and the 600 service every 30 mins to the Hospitals and Thornhill Park and Ride. Most of the site is within 800m of Pegasus Road stop with the 1 and 5 services running approximately every 5-6mins to the City Centre and Oxford Rail station.
Sustainable transport links (rail station)	I	Over 3.5km walk to Oxford Station, however there is potential for the site to be within walking distance of the Cowley Branch line station if this is delivered during the plan period.
Primary Schools	-	Approximately 1km to Windale Primary and John Henry Newman Academy Primary.
Secondary Schools	-	Approximately 1.5km to Oxford Academy.

GP Surgeries	+/-	Some parts of the site are within 800m of the nearest GP Surgery (The Leys Health Centre) while other parts of the site are further away.
Post office	-	Over 1km to Littlemore PO or Balfour Road PO (Dunnock Way Drop and Collect within 800m of some of the site).
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	-	Northern boundary of site within 30m of a watercourse.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with patches of vegetation along the brook and to the east. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	-	The Minchery Farmhouse is on the adjacent site. There is potential for prehistoric, Roman and medieval archaeology, dispersed Roman pottery manufacturing activity, burials and other features east and north of the standing Nunnery dormitory range. This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is outside of a conservation area.
Listed Buildings	-	Minchery Farmhouse (Grade II*) is adjacent to the site.
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Some employment-generating uses as part of the stadium, which will be replaced.
Diversifying the economy and employment opportunities	0	Unlikely to provide affordable workspace.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area (e.g., to Blackbird Leys). Potential for improvements to be made depending on use delivered.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS8: Land at Meadow Lane

Site name	Land at Meadow Lane
SHLAA reference (and OLP2036 Policy if applicable)	389 Policy SP42
Ward	Rose Hill and Iffley
Total site size (ha)	0.99ha
Existing use(s)	Private green space, in the past rented out for horse grazing

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	Small part in corner of the site.
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has expressed an intention to develop this site.
Does the landowner specify types of development	Seeking to deliver residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Small amount of Flood Zone 3a and 3b on the western boundary of the site, and a slightly wider area of Flood Zone 2. Surface water flooding in same area.
Flooding of land surrounding	0	Safe access and egress from the site can be achieved as the route identified is flood-free, with the majority of the site also in Flood Zone

site for access/egress		1. (There is a watercourse running along the site's western boundary, but the site would not be accessed from here).

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is unprotected open space.
Green belt?	0	Not in the Green Belt

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?

Criteria	SA rating	Comments
Housing provision	++	
Affordable housing provision	+	

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Not within 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.

Criteria	SA rating	Comments
Community facilities	0	Amount of community facilities likely to remain the same as a result of the application.

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?

Criteria	SA rating	Comments
Public open space	0	

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	>400m to nearest bus stop, Iffley turn. Services include 3 City, 3A.
Sustainable transport links (rail station)	-	>3200m from Oxford railway station
Primary Schools	-	>800m from nearest primary school (Rose Hill School)
Secondary Schools	-	>800m from nearest Secondary School (Greyfriars Oxford Catholic School)
GP Surgeries	-	>800m from the nearest GP surgery
Post office	-	>800m from the nearest post office
Air Quality	-	Whole city is within an Air Quality Management Area.

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?

Criteria	SA rating	Comments
Water	-	Small watercourse along western boundary of the site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Site contains no nature designations. Ecological assessments undertaken in support of a planning application have found the site is of value for invertebrates, and badger activity is evident. As such, the site is highly ecologically constrained. Although it is not subject to any designations for its wildlife value, it may qualify at least as an Oxford City Wildlife Site (if not a Local Wildlife Site). Any development proposals coming forward should retain and enhance as much of the habitat supporting the invertebrate assemblage as possible, and ideally the badger sett as well. If this cannot be achieved, a detailed assessment of how invertebrates and badgers utilise the site and surrounding land should be made, to inform a package of mitigation and compensation measures that ensures there are no residual impacts on either.

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?

Criteria	SA rating	Comments
Archaeology	-	Known archaeological potential. General potential for Iron Age and Roman activity and located within the historic core of the medieval village.
Conservation Areas & Register of Parks and	--	Site lies within the Iffley Conservation Area.

Gardens (RPG)		
Listed Buildings	-	Two Grade II Listed Buildings (Tudor Cottage and Townsend Close) and a Grade II Listed Wall (Wall and Gate of Townsend Close) nearby. The setting and any impacts on it of any proposed development would need to be understood as part of any application.
View Cones	-	Site within view cone
Historic Core Area	0	Not within 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in the number of jobs/ economic floorspace in the knowledge economy
Diversifying the economy and employment opportunities	0	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes. Via Church Way. Limited access for existing properties along Meadow Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees and hedgerows which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the location within the Iffley Village Conservation Area. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the

	criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit and enhance the character and appearance of the Iffley Village Conservation Area.
Are land contamination issues likely?	No significant contamination risks identified.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding uses are residential.

Stage 2 conclusion
This site is an unprotected undeveloped greenfield site with a small portion of the site in Flood Zone 3b. There are some heritage assets on the site including the site's location within the Iffley Conservation Area. It has some general archaeological potential and is sited within one of the city's locally designated view cones. Careful design will be needed to mitigate impacts on nearby heritage assets. There are also ecological concerns, in terms of the potential for badgers and invertebrates, but with potential for a scheme that responds to these carefully. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS9: Littlemore Mental Health Centre, Sandford Road

Site name	Littlemore Mental Health Centre, Sandford Road
SHLAA reference (and OLP2036 Policy if applicable)	33
Ward	Littlemore
Total site size (ha)	6.6
Existing use(s)	Site is in use for health care facilities, includes employer linked housing. Use Class C2.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Within 200m of SSSI (Littlemore Railway Cutting)
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Intending to develop some residential (employer-linked) subject to operational hospital uses.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1 (Patches of surface water flood risk present throughout site)</i>
Flooding of land surrounding site for	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is currently in use as a mental health centre.</i>
Green belt?	0	<i>Site is not on green belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	I	<i>Depends on implementation.</i>
Affordable housing provision	I	<i>Depends on implementation.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	+	<i>Site is adjacent to an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	

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?

Criteria	SA rating	Comments
Public open space	0	

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Bus stops located on Sandford Road - services 3A, 45, X40</i>
Sustainable transport links (rail station)	-	<i>Oxford Rail station over 1.6km from site</i>
Primary Schools	-	<i>John Henry Newman Academy located over 800m from the site</i>
Secondary Schools	-	<i>The Oxford Academy located over 800m from the site</i>
GP Surgeries	-	<i>Donnington Medical Practice over 800m from the site</i>
Post office	-	<i>Littlemore Post Office over 800m from the site</i>
Air Quality	-	<i>Site is located within an Air Quality Management Area</i>

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?

Criteria	SA rating	Comments
Water	--	Site contains 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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	Scrub by Heyford Hill Roundabout (incl. Littlemore Railway Cutting SSSI, which is a geological SSSI) Site has tree, grassland, pond and ditch habitats. Potential for various Priority/ Principal species in the area including swifts, badgers, common toad, hedgehog, grass snake, starling, dunnock, house sparrow, song thrush, reed bunting, starling. Earthwatch Tiny Forest: Littlemore within/ adjacent to site.

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?

Criteria	SA rating	Comments
Archaeology	-	Has archaeological potential – roman pottery has been found previously, also Iron Age and Roman remains recorded nearby.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in or on the edge of a conservation area or near site on the RPG register. Littlemore Conservation Area is located to the north of the site beyond the railway line.
Listed Buildings	0	Site contains no identified historic building constraint but heritage assets are located nearby.
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs/economic floorspace in knowledge-based economy</i>
Diversifying the economy and employment opportunities	0	<i>No change in employment base or access to affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access from Sandford Road
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are numerous trees on the northern (railway cutting) and southern (A4074) boundaries and other trees within the site. There is also a hedge line along site frontage with Sandford Road. There is a pond and brook on the site. Site is within 200m of SSSI (Littlemore Railway Cutting)
Are land contamination issues likely?	Any re-development on this site would likely require a contamination site investigation and risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS10: MINI Plant Oxford

Site name	MINI Plant Oxford
SHLAA reference (and OLP2036 Policy if applicable)	497 (SP8 MINI Plant Oxford; AOC7 – Cowley Branch Line)
Ward	Blackbird Leys
Total site size (ha)	69.9Ha
Existing use(s)	Car Plant (Mix of B2/ B8 and Class E(g) uses associated with manufacturing process)

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Application reference 23/02166/FUL for 26,350sqm net (GIA) under construction

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – ongoing ambitions continue to produce BMW MINI at MINI Plant Oxford.
Does the landowner specify types of development	No however, an appropriate mix of B2/ B8 and Class E(g) employment uses to enable on-going car manufacturing to remain in the city has been assumed.

Stage 1b conclusion
Landowner has ongoing ambitions to continue to use the site for car manufacturing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Large patches of surface water flood risk present, particularly centrally and towards the western corner of site.)

Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is previously developed land (in use as car manufacturing plant)</i>
Green belt?	0	<i>Site not within the Green Belt</i>

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?

Criteria	SA rating	Comments
Housing provision	0/1	<i>Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.</i>
Affordable housing provision	0/1	<i>Site unlikely to deliver affordable housing but depends on implementation.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most	0	<i>The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 55% of neighbourhoods – IMD 2025)</i>

deprived areas IMD)		

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.

Criteria	SA rating	Comments
Community facilities	0	Community facilities unlikely to change

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?

Criteria	SA rating	Comments
Public open space	0	Public open space unlikely to change

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Nearest Bus Stops is Factory Gate (Garsington Road) - less than 400m from site entrance. This is a frequent service bus stop. There is turn style access for workers directly onto the site.
Sustainable transport links (rail station)	-	Oxford Railway station is more than 800m away (in fact, more than 5km away)
Primary Schools	-	Nearest Primary school is more than 800m away (St Francis CofE Primary)
Secondary Schools	-	Nearest secondary school is more than 800m away (Oxford Academy is almost 2km away)
GP Surgeries	-	Nearest GP Surgery is more than 800m away (Hollow Way Medical Centre – part of St Bartholomew & Hollow Way Medical Practice is 1.5km away)

Post office	-	<i>Although Balfour Road Post Office is within 800m of Gate 10 (Garsington Road), given the size of the site, the majority of it is more than 800m away from the nearest Post Office</i>
Air Quality	-	<i>Within city-wide AQMA but outside of recognised air quality “hotspot”.</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Pond within 30m of eastern site boundary</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Contains no nature conservation designations. However, site contains 9ha approx. of former playing fields. Aerial imagery shows some hedgerows on this greenspace which have some ecological potential. The remainder of the site contains limited green spaces which seem to comprise artificially landscaped areas including trees and mowed grass areas.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site is of archaeological interest as the Dorchester-Alchester Roman Road runs through the site and there is potential for roadside settlement. Archaeological remains from the Bronze Age and Roman remains have also previously been recorded.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Site is not in or on the edge of a conservation area or site on the RPG register</i>

Listed Buildings	0	<i>Site contains no identified historic buildings constraint</i>
View Cones	0	<i>Site lies outside of a view cone</i>
Historic Core Area	0	<i>Site lies outside the historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	<i>Unlikely to increase jobs in knowledge-based sectors due to nature of employment – i.e., car manufacturing but depends upon implementation</i>
Diversifying the economy and employment opportunities	I	<i>Site would support continued diversification of employment base by continuing to offer car manufacturing jobs – again generally depends upon implementation</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes, although size, nature and location of the site – accessed from Oxford Ring Road (A4142) result in a rather car-dominated environment.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The site contains scattered trees around car parking areas and along main vehicular routes. Overall, the site appears relatively flat.
Are land contamination issues likely?	Possible contamination issues due to many years of use as a car manufacturing plant. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins a railway line, the ring road and other industrial/ storage style employment. Site is also adjacent to fields/ arable land and sports pitches.

Stage 2 conclusion

No insurmountable constraints to continued car-manufacturing-related development activities at this site. The site has some archaeological potential due to its proximity to the Dorchester-Alchester Roman Road. Potential for surface water flood risk at parts of site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS11: Overflow Carpark at Kassam Stadium

Site name	Overflow carpark at Kassam Stadium
SHLAA reference (and OLP2036 Policy if applicable)	028b Policy SP14
Ward	Northfield Brook
Total site size (ha)	2.29
Existing use(s)	Surface level overflow car park

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b (south-western corner of car park and partly along south-eastern perimeter). (Patch of surface water flood risk towards far eastern corner of site)
Flooding of land	-	A very small part of the initial access route is within Flood Zones 2 and 3a, although most of the route lies within Flood Zone 1.

surrounding site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site consists of previously developed land</i>
Green belt?	0	<i>Site lies outside the Oxford Green Belt</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Landowner interest in developing the site for housing, which is a suitable use.</i>
Affordable housing provision	+	<i>Site likely to deliver affordable housing.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	+	<i>Site is adjacent to a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	I	There is potential for community facilities to be delivered on site however this would depend 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?

Criteria	SA rating	Comments
Public open space	+	<i>Site likely to deliver additional open space.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	<i>600m to Littlemore 5A every 30 mins, just over 800m to Pegasus Road stop with buses every 5-6mins to the city centre</i>
Sustainable transport links (rail station)	I	Over 3.5km walk to Oxford Station however there is potential for the site to be within walking distance of a new Cowley Branch line station if this delivered during the plan period.
Primary Schools	-	<i>Just over 800m to John Henry Newman Academy primary</i>
Secondary Schools	-	<i>1.4km to Oxford Academy</i>
GP Surgeries	-	<i>1.4km to The Leys Health Centre</i>
Post office	-	Over 1km to Littlemore PO or Balfour Road PO
Air Quality	-	<i>Whole city is within an AQMA</i>

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?

Criteria	SA rating	Comments
Water	-	Southern boundary of site within 30m of a watercourse

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with small patches of vegetation in the northern parcel. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	-	There is potential for prehistoric, Roman and medieval archaeology. The archaeology is dispersed and mostly focused around the fringes of the car park (peat with potential for prehistoric pollen sequences near the Bingo Hall, dispersed Roman pottery manufacturing activity, burials and other features

		east and north of the standing Nunnery dormitory range). This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is outside of a Conservation Area but close to the Littlemore Conservation Area.
Listed Buildings	0	Site is nearby Minchery Farmhouse (Grade II*) although not within the setting of.
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>Not expected to lead to a change in the number of jobs or amount of floorspace in knowledge-based economy.</i>
Diversifying the economy and employment opportunities	0	<i>No change in employment base or access to affordable workspaces expected.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road, through the main Kassam site and across the bridge into the site.
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area, e.g., to Blackbird Leys and Littlemore, but improvements would be needed.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Vegetation around the edges of the site. Brook to the south is a wildlife corridor which can be enhanced.

Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	n/a

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS12: Oxford Science Park

Site name	Oxford Science Park
SHLAA reference (and OLP2036 Policy if applicable)	588 LP2036 Policy SP9 – Oxford Science Park & Policy AOC7 – Cowley Branch Line
Ward	Littlemore
Total site size (ha)	27.33
Existing use(s)	Mix of employment uses (mainly office and labs) and ancillary uses including car parking and nursery.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	Site not greenfield, but some areas of Flood zone 3b,

		generally following the line of the watercourse which runs through the site.
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	Yes	All remaining plots, either have planning permission or development has commenced

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Confirmed intention to retain/redevelop for employment R&D uses
Does the landowner specify types of development	Employment (R&D) uses – primarily a mix of laboratory and office buildings and associated uses

Stage 1b conclusion
Confirmed landowner intention, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b - the flood zone largely follows the boundaries of the watercourse which runs east-west along northern portion of site. Areas of Flood Zone 2 and 3a extend slightly further beyond. (Various patches of surface water flood risk present within site)
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – surrounding area for access to the site is Flood Zone 1.

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	I	Site unlikely to deliver new homes however policy E1 allows housing delivery on employment sites if landowner intentions were to change
Affordable housing provision	I	Site unlikely to deliver affordable housing because no housing is proposed, but 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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	++	Site is partly within 20% most deprived, and partly within 30% most deprived.

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.

Criteria	SA rating	Comments
Community facilities	0	Community facilities unlikely to change as a result of allocation

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?

Criteria	SA rating	Comments
Public open space	+	Public open space should be provided as part of redevelopment of plots

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Bus stop on site (number 45 – limited hours service). Also close to site (Park Homes stop – frequent service stop, close to the site – 550m away)
Sustainable transport links (rail station)	-	Oxford Station is more than 5km away
Primary Schools	-	John Henry Newman Academy is 1.5km away

Secondary Schools	-	The Oxford Academy is 2km
GP Surgeries	-	The Leys Health Centre is more than 2km away)
Post office	-	Littlemore Stores & Post Office is more than 2km away)
Air Quality	-	Within AQMA but outside of identified hotspot or area in breach of local air quality standards

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?

Criteria	SA rating	Comments
Water	--	Littlemore Brook runs through the site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Littlemore Brook (Oxford City Wildlife Site) runs through the site. Several trees appear on-site as does a small area of woodland which screens acts as a visual screen from the sewage infrastructure located to the south. Trees along part of the northern boundary to the site are covered by a TPO woodland group area (which runs part of the way along the Littlemore Brook from the A4074 and then acting as a boundary between Littlemore house and the new development directly to the south and the Science Park itself. Northern boundary and area on the east (generally following the watercourse) identified in LRNS as areas that have the potential to become important for biodiversity.

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?

Criteria	SA rating	Comments
Archaeology	-	Archaeological potential for Saxon and Roman remains
Conservation Areas &	0	Site not within one of the city's conservation areas or on the RPG register

Register of Parks and Gardens (RPG)		
Listed Buildings	-	Minchery Farmhouse (Grade II*) is adjacent to the site.
View Cones	0	Site lies outside the city's view cones
Historic Core Area	0	Site lies outside the city's 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	Development of remaining plots, and intensification of existing developments will support the knowledge economy.
Diversifying the economy and employment opportunities	+	Site has potential to deliver affordable/ flexible workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, access already exists
Can walking and cycling connections with the surrounding area be achieved?	Yes, active travel connections can be improved as accessibility of area is car-dominated
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains trees, hedgerows and woodland likely to form part of structural landscaping. Site contains Littlemore Brook – Oxford City Local Wildlife Site. No significant changes in ground level.
Are land contamination issues likely?	Some areas of potential contamination are present resulting from filled ground. Further site investigations will be required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Oxford Sewage Treatment Works is located to the South of the site (smells). Residential properties in Littlemore are located to the North. A4074 is located to the west (noise) and

	to the east is the Kassam Stadium including the Ozone Leisure Park.

Stage 2 conclusion
Site is generally sustainable for ongoing / intensified use for employment, and more so with the opportunities for sustainable travel that will come with the reopening of Cowley Branch line with a new passenger station adjoining this site during the plan period. Care will need to be taken in terms of the site's proximity to the brook (including in relation to potential need for buffers but also in terms of addressing flood risk arising from the watercourse); to nearby protected trees; and the potential for archaeology which may need investigation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS13: Ozone Leisure Park and Minchery Farmhouse

Site name	Ozone Leisure Park and Minchery Farmhouse
SHLAA reference (and OLP2036 Policy if applicable)	028c
Ward	Littlemore
Total site size (ha)	3.0 ha
Existing use(s)	Cinema, bowling, other community/leisure uses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – mixed use development including R&D (already planning permission for part of site 23/01198/FUL)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Very small area of Flood Zone 3a and 3b immediately adjacent to the brook, slightly wider area of Flood Zone 2. Patches of surface water flooding.
Flooding of land	0	Grenoble Road nearly all free of flood risk.

surrounding site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site consists of previously developed land
Green belt?	0	Site lies outside the Oxford Green Belt

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?

Criteria	SA rating	Comments
Housing provision	0	
Affordable housing provision	0	

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	++	Site is within 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.

Criteria	SA rating	Comments
Community facilities	I	Community function would be replaced, but whether there is additional or the form will depend 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?

Criteria	SA rating	Comments
Public open space	+	Site is likely to deliver additional public open space.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m to nearest bus stop outside Kassam stadium which provides 3A service every 30mins to Templars Square and the 600 service every 30 mins to the Hospitals and Thornhill Park and Ride. Most of the site is within 800m of Pegasus Road stop with the 1 and 5 services running approximately every 5-6mins to the City Centre and Oxford Rail station.
Sustainable transport links (rail station)	I	Over 3.5km walk to Oxford Station, however there is potential for the site to be within walking distance of the Cowley Branch line station if this is delivered during the plan period.
Primary Schools	-	Approximately 1km to Windale Primary and John Henry Newman Academy Primary.
Secondary Schools	-	Approximately 1.5km to Oxford Academy.
GP Surgeries	+/-	Some parts of the site are within 800m of the nearest GP Surgery (The Leys Health Centre) while other parts of the site are further away.
Post office	-	Over 1km to Littlemore PO or Balfour Road PO (Dunnock Way Drop and Collect within 800m of some of the site).

Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	-	Northern boundary of site within 30m of a watercourse.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., along brook. The site is dominated by hardstanding and the stadium, with patches of vegetation along the brook and to the east. It appears to have very limited intrinsic ecological value. However, it is bordered by the Littlemore Brook and Northfield Brook OCWSs, which provide a corridor for wildlife. A buffer should be included to support these features. There is scope to deliver significant ecological enhancements, which should include an element focused on buffering the brooks. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	--	Contains the Minchery Farmhouse, which formed part of Littlemore Priory. There is potential for prehistoric, Roman and medieval archaeology (peat with potential for prehistoric pollen sequences near northwestern corner of the Ozone, dispersed Roman pottery manufacturing activity, burials and other features east and north of the standing Nunnery dormitory range). This will need to be explored as part of any redevelopment.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is outside of a conservation area.
Listed Buildings	--	Minchery Farmhouse (Grade II*)
View Cones	0	Site lies outside of a view cone
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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	The redevelopment of the ozone leisure park presents an opportunity to deliver an increase in jobs to support the knowledge economy.
Diversifying the economy and employment opportunities	+	The Kassam Stadium is a site where affordable workspaces may be expected to come forward. This site would therefore support diversification of the employment base or provide affordable workspaces.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access exists from Grenoble Road

Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections already exist to surrounding area (e.g., to Blackbird Leys). Potential for improvements to be made depending on use delivered.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level. Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Includes areas of filled ground which may be unsuitable for housing without mitigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	N/A

Stage 2 conclusion
No insurmountable constraints to development. Proximity to Grade II* listed Farmhouse may require design sensitivity in a small part of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS14: Redbridge Paddock

Site name	Redbridge Paddock
SHLAA reference (and OLP2036 Policy if applicable)	113 Policy SP29
Ward	Hinksey Park
Total site size (ha)	3.64ha
Existing use(s)	Private open space previously used for horse grazing.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes (2025 confirmed intention)
Does the landowner specify types of development	Yes – Residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	A very small portion of the site lies within Flood Zone 3a, mainly along the watercourses, with a marginally higher area within Flood Zone 2 (mainly towards the northern boundary of the site). Only a few very small patches of surface water flooding.

Flooding of land surrounding site for access/egress	0	There is safe access/egress from the site from the south, as the ring road and Abingdon Road lies in Flood Zone 1.

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is meadowland used for grazing until recently (unprotected private open space)
Green belt?	0	Site not in the green belt.

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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for homes and residential moorings.
Affordable housing provision	+	Site expected to deliver policy compliant levels of affordable housing.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities.

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?

Criteria	SA rating	Comments
Public open space	+	10% POS will be provided within the site.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Less than 100m away there are regular bus services on the Abingdon Road, and from the Park and Ride opposite the site
Sustainable transport links (rail station)	-	Oxford railway station is over 20 minutes walk (3500m)
Primary Schools	-	The nearest school is more than 800m away.
Secondary Schools	-	The nearest school is more than 800m away.
GP Surgeries	-	The nearest GP surgery is more than 800m away.
Post office	-	The nearest post office is more than 800m away.
Air Quality	-	Entire city lies 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?

Criteria	SA rating	Comments
Water	-	Weirs Mill Stream, a tributary of the Thames, runs along the eastern edge of the site.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	Within 50m of the Iffley Meadows SSSI Site is not subject to any designations for its wildlife value; however, the land opposite the River Thames forms part of the Iffley Meadows Site of Special Scientific Interest (SSSI). The potential for any proposed development to directly or indirectly impact the SSSI must be assessed. Aerial imagery indicates Redbridge Paddock is dominated by grassland with areas of scattered scrub and potentially a woodland belt along the eastern boundary. Numerous tree lines are present. Iffley Meadows SSSI is noted for its alluvial flood meadows containing a rich grassland flora. It should be a priority to establish the distinctiveness and condition of the grassland within the allocation site to understand the extent of constraint this provides to potential development. Potential protected species constraints include roosting bats, foraging and commuting bats, badger, water vole, otter, breeding birds, reptiles, and invertebrates. In addition, the River Thames is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of any proposed development. A lighting strategy should be submitted in support of any planning application, setting out the lighting associated with the proposed development. Given the proximity of the proposed development, this will need to account for both internal and external lighting. It is vital that a suitable buffer in terms of size and composition is provided to the River Thames and Iffley Meadows SSSI. This should include retaining the existing treeline / woodland belt and delivering high quality habitats within the river corridor. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the

		area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	-	Potential for Norman/ medieval archaeological remains.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site not within a conservation area or RPG
Listed Buildings	0	Site does not contain any listed buildings
View Cones	0	Site not within view cone
Historic Core Area	0	Site outside the city's locally designated high buildings 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Site not allocated for employment, unlikely to support additional jobs in the knowledge economy.
Diversifying the economy end	0	No change.

employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access to the site would be from Abingdon Road and may require either a connection into the existing signalised junction from Abingdon Road/Old Abingdon Road or a connection into the existing traffic signals for buses accessing the Redbridge P & R site opposite.
Can walking and cycling connections with the surrounding area be achieved?	Yes two points of access would be required for pedestrians and cyclists: one to the west connecting with the bus stops at the P & R site and the other to the north connecting with existing bus stops on Abingdon Road. The existing cycle track which runs along the western boundary should be retained.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Weir Mill stream forms the eastern boundary to the site, the site is comprised of made up ground being a former landfill site. Site contains significant existing trees along the river bank which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity and to enhance the street scene along Abingdon Road and cycle track.
Are land contamination issues likely?	Yes – historic use as landfill
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No but consideration needs to be given about views into the site from Iffley village

Stage 2 conclusion
No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS15: Sandy Lane Recreation Ground

Site name	Sandy Lane Recreation Ground
SHLAA reference (and OLP2036 Policy if applicable)	SHLAA #289 Local Plan 2036 policy SP11
Ward	Blackbird Leys
Total site size (ha)	5.15ha
Existing use(s)	Green open space with sports pitches, vacant car parking area off Ambassador Avenue currently used for motorbike training

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2023 landowner intention to develop.
Does the landowner specify types of development	Local Plan 2036 allocation establishes site as suitable for residential on the western part of site, subject to reprovision of sports facilities and safeguarding land for Cowley Branch line.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1. Surface water flooding across site.

Flooding of land surrounding site for access/ egress	0	<i>There is safe access and egress from the site- surrounding streets in Flood Zone 1.</i>

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is greenfield land (public open space)
Green belt?	0	Site not in the green belt

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Site is allocated residential-led development. Landowner intention to include significant amount of residential.</i>
Affordable housing provision	+	<i>Site should be capable of providing affordable housing.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most	0	<i>The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 64% of neighbourhoods – IMD 2025)</i>

deprived areas IMD)		

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.

Criteria	SA rating	Comments
Community facilities	I	Development of the site could lead to decrease in sports facilities unless these are appropriately reprovided. Will depend upon 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?

Criteria	SA rating	Comments
Public open space	-	Development at this site likely to reduce the amount of available public open space.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m to nearest bus stop on the Blackbird Leys Road with frequent services
Sustainable transport links (rail station)	-	Currently more than 1600m from Oxford Railway Station, however, potential to be in close proximity to Cowley Branch Line in future.
Primary Schools	+	Primary school within 800m
Secondary Schools	-	Nearest secondary school is more than 800m away.
GP Surgeries	-	1.5km to nearest GP in Blackbird Leys.
Post office	-	About 1km to Balfour post office
Air Quality	-	Whole city within AQMA but not in proximity to hotspot.

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?

Criteria	SA rating	Comments
Water	0	Not within 30m of a watercourse

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	No designations on or near the site. The site is currently an open space for recreational sports pitches, there is scrub and vegetation and some tree planting along the southeastern and southwestern edges of the site. Potential protected species constraints are likely limited to nesting birds in boundary vegetation. There may be potential to improve habitat provision through enhancement of the remaining green space which is currently unlikely to provide much in ecological terms.

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?

Criteria	SA rating	Comments
Archaeology	-	A sizable site with Roman kiln 90m to west and medieval stray finds to the east means some potential for deposits on site.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Nothing notable
Listed Buildings	0	Nothing notable
View Cones	0	Nothing notable

Historic Core Area	0	Nothing notable

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>Unlikely to result in change in the number of jobs related to the knowledge economy.</i>
Diversifying the economy and employment opportunities	0	<i>No change.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, from BBL road however there is a slope from the road and so the change in levels needs to be considered.
Can walking and cycling connections with the surrounding area be achieved?	There is a cycle path running along the north-western side of the site beyond the ring road. There is scope to improve connections for pedestrian and cycling by creating access through the retail park.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Change is ground levels as the BBL road is above the site Site contains significant existing trees around the boundaries which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Some made ground and potential fill so likely minor contamination risks. Site investigations would be required.

Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The ring road runs along one side of the site and the Cowley Branch Line to the other side which if opened up to passenger services would result in more train movements with the potential for more noise and pollution.

Stage 2 conclusion
The site is generally a sustainable one with limited heritage or biodiversity sensitivities, however, any development will need to take into consideration the loss of existing pitch provision and deliver appropriate re-provision to mitigate for losses of these public facilities. Additionally, the site adjoins a railway line and the A4142 and mitigation may be required to minimise impacts on new residents. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS16: Templars Square

Site name	Templars Square
SHLAA reference (and OLP2036 Policy if applicable)	014 Policy SP3
Ward	Cowley
Total site size (ha)	3.88Ha
Existing use(s)	Mixed use including retail, parking, residential

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Planning permission was granted (November 2021) for a mixed-use scheme comprising retail, 225 residential units and hotel (16/03006/FUL). There has since been a change in ownership and this permission has expired.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 2 assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Mixed of uses including retail and residential

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1</i> <i>(Patches of surface water flood risk present across site, particularly towards the south western area around Hockmore Street and central area to the east.)</i>
Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is occupied and in use for retail, economic and residential uses</i>
Green belt?	0	<i>Site not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Expired permission includes 225 residential units. Landowner intent remains to deliver housing.</i>
Affordable housing provision	+	<i>Likely that any new scheme coming forward would deliver affordable housing.</i>

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.*

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not within one of the most deprived areas of Oxford.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Community facilities likely to remain the same- would be protected by policy.</i>

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?

Criteria	SA rating	Comments
Public open space	I	Public open space could be re-modelled or re-provided as part of residential e.g. rooftop gardens. There is also opportunity to improve access and visual links to nearby green spaces especially the park area opposite (John Allen Park), and to create new areas of attractive public open space within the site.

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? 18 St Omer Rd, Oxford OX4 3HBtemp

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Multiple frequent bus services adjacent to the site, along Between Towns Road, Crowell Road and Barns Road, with services connecting to the City Centre, Cowley Road, JR Hospital, and Blackbird Leys. (Services 1, 5A, 5, 10, 700). Also less frequent (hourly) services connecting further afield to Great Milton, Chalgrove and Watlington (services 11, 46).

		Also within 400m are bus stops along Oxford Road, including Brookes Bus frequent service. Policy SP3 also notes that bus stopping facilities should also be improved.
Sustainable transport links (rail station)	-	5.3km to Oxford Rail Station
Primary Schools	+	Primary schools within 800m (Church Cowley St James).
Secondary Schools	-	Greyfriars Oxford Catholic School 1.3km, Oxford Spires Academy 1.9km
GP Surgeries	+	Temple Cowley Health Centre 500m
Post office	+	Onsite and Rose Hill 650m
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	0	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	The site is predominantly brownfield so there will be opportunities to introduce some biodiversity and natural resource enhancements, e.g. more trees, green walls, roof gardens. Semi-natural habitats are absent from the site. Potential protected species constraints include roosting bats and nesting birds; however, the urban surrounding reduces the likelihood that bats are present. The need for survey work should be assessed on a case-by-case basis with any application coming forwards.

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?

Criteria	SA rating	Comments
Archaeology	-	Site is of archaeological interest - Historic core of Church Cowley and western end of Roman pottery manufacturing compound, though heavily built up.
Conservation Areas & Register of Parks and Gardens (RPG)	-	Partly adjoins Beauchamp Lane CA
Listed Buildings	-	Site forms the setting of a number of listed buildings on Beauchamp lane.
View Cones	0	The site is not in a View Cone, although is in an elevated position in the city.
Historic Core Area	0	Site outside of 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in the number of jobs/economic floorspace in the knowledge-based economy.
Diversifying the economy and employment opportunities	I	In this district centre location, there is scope for affordable workspace to be delivered and diversification outside of the knowledge economy, but it will depend on implementation.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes There is currently pedestrian access from all directions, all around the site. The surrounding pavements are fairly wide. Height differences across the site at present could present access issues for wheelchair users and buggies, as the site is accessed in some places via stairways. Opportunity to enhance public realm to accommodate improved pedestrian connectivity across Between Towns Road and across Barns Road which are both busy roads, and an improved pedestrian and cycle experience e.g. there are some large junctions that cyclists would currently need to navigate including the junction at the entrance to John Allen Way, and other ways to improve support for walking and cycling should also be explored as the current situation is skewed towards access by car.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There is a variation in base level across the site, with the rear/northern side of the site being 1-2 storeys higher up than the base level at the southern edge of the site along Between Towns Road. No significant physical features, a few ornamental trees.
Are land contamination issues likely?	Contamination risks potentially present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified, mainly residential surrounding the site

Stage 2 conclusion
The site is previously developed land and is in an accessible location. The site is also not sensitive from an ecological perspective. However, it lies adjacent to a conservation area, so design sensitivity in that location will be required. Also, the site has some archaeological potential. None of the heritage constraints are insurmountable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPS17: Unipart

Site name	Unipart
HELAA reference (and OLP2036 Policy if applicable)	120 (Policy SP7 Unipart and Policy AOC7 Cowley Branch Line)
Ward	Blackbird Leys
Total site size (ha)	30.63ha
Existing use(s)	Warehousing, Industrial uses, offices

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, landowner has expressed an interest to redevelop the site within the plan period
Does the landowner specify types of development	Yes – employment uses

Stage 1b conclusion
Landowner has confirmed intent to develop. Consider site further for employment uses, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1</i> <i>(There are patches of surface water flood risk present throughout site)</i>
Flooding of land	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

surrounding site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land and with buildings in use on site
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	0/1	Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.
Affordable housing provision	0/1	Site unlikely to deliver affordable housing but 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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	The site is not within a Regeneration Area. (Site lies within an area that is more deprived than 55% of neighbourhoods – IMD 2025)

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Site unlikely to deliver community facilities</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Public open space is unlikely to increase resulting from the allocation of this site.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Less than 100m from site entrance to "Buildbase" Bus Stop (11 City bus)</i>
Sustainable transport links (rail station)	-	<i>More than 1600m from nearest railway station (Oxford Station)</i>
Primary Schools	-	<i>More than 800m from nearest Primary School (Pegasus Primary School)</i>
Secondary Schools	-	<i>More than 800m from nearest Secondary School (Oxford Academy is more than 2km away)</i>
GP Surgeries	-	<i>More than 800m from nearest GP Surgery (The Leys Health Centre is more than 1km away)</i>
Post office	-	<i>More than 800m from nearest Post Office (Balfour Road Post Office is more than 1km away)</i>
Air Quality	-	<i>Within AQMA but outside known "hotspots"</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Hollow Brook runs along the north-eastern boundary of the site</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Site is highly urbanised with mainly artificial/ impermeable surface cover. It contains an area of scrub to the north-east and trees and hedges on the boundaries. There are opportunities for greening of surfaces/ roofs.</i> <i>Potential for Open Mosaic Habitat to be present in the surrounding developed land. Potential protected species constraints likely include breeding birds, foraging and commuting bats, reptiles, badgers, and water vole and otters (associated with Hollow Brook). Hedging/trees on boundaries.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site is of archaeological interest as part of the access road is on the line of the Dorchester-Alchester Roman road and there is high potential for roadside settlement. There is also high potential for other prehistoric and Roman remains (sites are recorded to the north & south of the plot).</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Site is not within or adjacent to a conservation area or RPG site</i>
Listed Buildings	0	<i>Site contains no identified historic building constraint</i>
View Cones	0	<i>Site lies outside of a view cone</i>

Historic Core Area	0	<i>Site lies outside the City Council's locally designated Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	<i>Site likely to be redeveloped in the plan period for a mix of B class and E class jobs, the latter have the potential to support the knowledge economy</i>
Diversifying the economy and employment opportunities	+	<i>The site is likely to be redeveloped in the plan period and has the potential to support diversification of the employment base by nature of the mix of B class and E class jobs. Also has the potential to deliver affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, Vehicular access exists
Can walking and cycling connections with the surrounding area be achieved?	Yes, it is possible to achieve these although currently the site has poor accessibility for walking and cycling
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant features however site is an irregular shape.
Are land contamination issues likely?	Potential for contamination. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is in an industrial area with adjacent fields (to the east).

Stage 2 conclusion
There are no notable issues with the site. The site is currently designated as a category 1 employment site and is likely to continue to remain suitable for employment uses in future. Design would need to consider any impacts to the hollow brook on the boundary of the site and

should take opportunities to incorporate natural features to break up the urbanised nature of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE1: Churchill Hospital

Site name	Churchill Hospital
SHLAA reference (and OLP2036 Policy if applicable)	012 Policy SP19
Ward	Churchill
Total site size (ha)	22.74
Existing use(s)	Hospital, student and staff accommodation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Partially	Incremental change including 2 completed permissions for housing. Still significant potential and intention for change.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Planning permission 19/01039/FUL for 19 key worker units, completed, and permission for further 32 units also completed (June 2022).
Does the landowner specify types of development	Potential interest in further development at the site, as hospital, research, and additional housing.

Stage 1b conclusion
Landowner has expressed interest in further development of the site. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Several patches of surface water flood risk present within site)
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is occupied and is in use as an NHS Trust hospital.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	1	The hospital will remain the principal use of the site, however there is already accommodation on the site and the hospital trust may propose more, depending on implementation.
Affordable housing provision	1	If housing comes forward it is likely to be in the form of employer-linked housing, affordable to staff of the hospital trust.

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.

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not 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.

Criteria	SA rating	Comments
Community facilities	/	Unlikely to increase community facilities on site but precise mix will depend on implementation and which of the other suitable uses come forward. 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?

Criteria	SA rating	Comments
Public open space	/	Depending on how much of the site is brought forward for residential there is the potential to require some public open space. Depends on implementation

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<300m away from the nearest bus stop with frequent service into Oxford City Centre e.g. 15, 600, 700
Sustainable transport links (rail station)	-	> 1600m from train station (4.2km)
Primary Schools	-	>800m from Wood Farm Primary (c.1km)
Secondary Schools	+	600m from the nearest secondary school (Cheney School)
GP Surgeries	-	1,200m from nearest GP surgery (Brookes Medical Centre)
Post office	-	1,100m from the nearest post office (Wood Farm Post Office)
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	-	Boundary Brook runs along the southern boundary

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	While there are no designated ecological features on the site itself, the site directly adjoins a number of designated ecological sites and parts of the GI network including Lye Valley SSSI, Boundary Brook wildlife corridor and local/ city wildlife sites. The site and boundary does contain deciduous woodland which would constitute a priority/ principal habitat. The site itself is mostly built out and dominated by buildings and hardstanding, with pockets of green space comprising grassland, scrub and scattered trees. The site has significant existing trees scattered within it and near to the western boundary growing along Boundary Brook which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Protected species constraints within the site are likely limited to roosting bats and nesting birds; consideration should also be given to what value different parts of the site may hold for ecological connectivity in the wider landscape. Any planning application will need to demonstrate how a reduction in the quantity or quality of groundwater recharge, or an increase in surface water run-off, will be avoided to ensure there are no significant effects on the Lye Valley SSSI.

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?

Criteria	SA rating	Comments
Archaeology	-	This site has known archaeological potential (Roman pottery manufacturing and further Roman archaeological remains).
Conservation Areas & Register of Parks and Gardens (RPG)	0	
Listed Buildings	0	
View Cones	0	
Historic Core Area	0	

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	/	Site has potential to deliver additional jobs to support the knowledge economy and life sciences.
Diversifying the economy and employment opportunities	/	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access already exists
Can walking and cycling connections with the surrounding area be achieved?	Existing connections and routes to site are established, although movement within the site can be improved by making more pedestrian and cyclist friendly and more legible.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site has significant existing trees scattered within it and near to the western boundary growing along Boundary Brook which are important to

	public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. Peat reserves potential at northwestern corner of site.
Are land contamination issues likely?	Long-established continuous medical use onsite so it may be possible.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjoins SSSI.

Stage 2 conclusion	
Site does not have significant constraints to development. The site's proximity to the Lye Valley SSSI means that any development that does take place will need to be fully mitigated to ensure that development does not adversely impact the SSSI. No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.	

SPE2: East Oxford Bowls Club

Site name	East Oxford Bowls Club
SHLAA reference (and OLP2036 Policy if applicable)	204
Ward	St Clement's
Total site size (ha)	0.3ha
Existing use(s)	Recreation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Residential.

Stage 1b conclusion
Landowner has confirmed intent to develop, consider further for allocation for housing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 <i>(Surface water flood risk is located predominantly inside the north western, south eastern and south western perimeter of site, with a patch located more centrally.)</i>
Flooding of land surrounding site for	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	+	Site is previously developed with vacant buildings on site.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for residential development and would provide more than 10 homes.
Affordable housing provision	+	Site would likely provide up to 40% affordable housing.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not within or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	Allocation would lead to loss of former community facility, although this is no longer in use or accessible to the public.

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?

Criteria	SA rating	Comments
Public open space	0	Site not allocated.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m from multiple bus services on Cowley Road.
Sustainable transport links (rail station)	-	>1600m from Oxford train station.
Primary Schools	-	>800m to the nearest primary school.
Secondary Schools	-	800m to the nearest secondary school (Oxford Spires Academy).
GP Surgeries	+	<800m from the nearest GP (Bartlemas Surgery).
Post office	-	>800m from the nearest post office (Donnington Post Office).
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments

Water	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Adjacent to green infrastructure network (allotments). Site itself contains no nature conservation designations but has potential for nature conservation interest. Potential to improve wildlife linkages or habitat continuity. Records of swifts <100m from site.

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?

Criteria	SA rating	Comments
Archaeology	0	Located between Leper Hospital and Cowley Road the potential is unclear, would require desk based assessment in first instance.
Conservation Areas & Register of Parks and Gardens (RPG)	-	Site is entirely within Bartlemas Conservation Area.
Listed Buildings	-	Site forms the setting of multiple listed buildings within the conservation area.
View Cones	-	Within view cone/High Buildings Area.
Historic Core Area	0	Site is not within 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?

Criteria	SA rating	Comments

Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/employment floorspace in knowledge-base economy.
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces.

Other constraints which could affect suitability of site for development

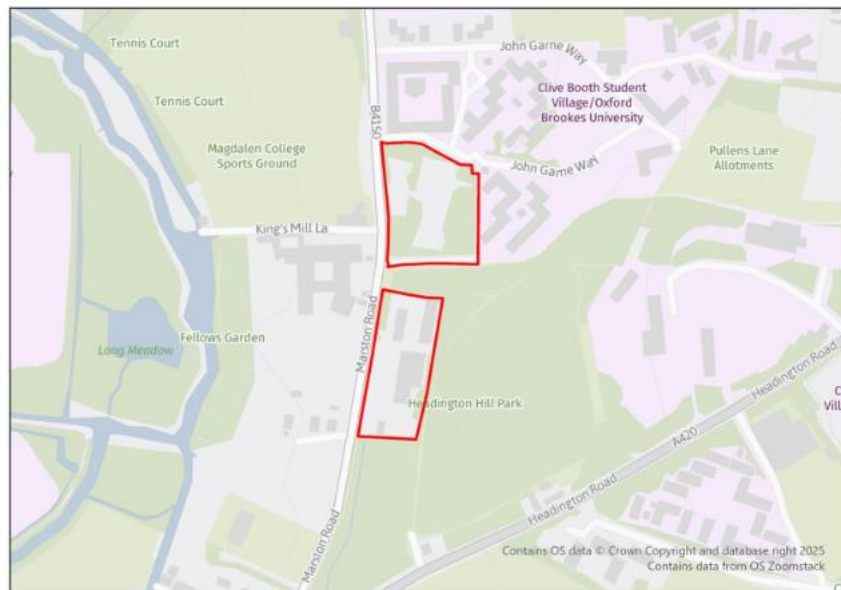
Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	As the site is entirely within a conservation area, all trees within and surrounding the site are subject to a Tree Protection Order.
Are land contamination issues likely?	No.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No.

Stage 2 conclusion
No insurmountable constraints although any potential development would need to take into account the site's sensitive historic environment including nearby listed buildings, the view cone and make a positive contribution to Bartlemas Conservation Area. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE3: Government Buildings and Harcourt House

Site name	Government Buildings and Harcourt House
SHLAA reference (and OLP2036 Policy if applicable)	024 (formerly also 023) Policy SP16
Ward	Headington Hill and Northway
Total site size (ha)	2.37ha
Existing use(s)	Car park, offices and cadet accommodation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes - landowner has confirmed intention.
Does the landowner specify types of development	Yes - mixed use academic development to include residential for staff and students with complimentary commercial uses.

Stage 1b conclusion
Consider site further for allocation for mixed use academic development to include residential development for staff and students, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1 (Patches of surface water flood risk around the southern half of the lower parcel).</i>
Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>The site is previously developed with some buildings in use</i>
Green belt?	0	<i>Site not in the Green Belt</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Site currently allocated residential-led development. Landowner intention to include significant amount of residential.</i>
Affordable housing provision	I	<i>Depends on implementation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>The site is not within a Regeneration Area. (Site lies within an area that is less deprived than 93% of neighbourhoods – IMD 2025)</i>

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.

Criteria	SA rating	Comments

Community facilities	I	Site has potential to deliver community facilities- 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?

Criteria	SA rating	Comments
Public open space	I	<i>Likely to deliver public open space, depending on amount and form of residential.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Bus stop outside site with buses 100 and X3 to city centre about 10min frequency</i>
Sustainable transport links (rail station)	-	<i>c.3km to Oxford Station</i>
Primary Schools	+	<i>c.300 metres to St Michaels CE</i>
Secondary Schools	-	<i>1.3km to Cheney School</i>
GP Surgeries	-	<i>c.1km to Brookes Medical Centre</i>
Post office	+	<i>c.600m to St Clement's Post Office</i>
Air Quality	-	<i>Whole city is within an AQMA</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Site is more than 30m away from a water body</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	There are limited opportunities for habitat creation at this site however there are opportunities to retain and enhance existing features. Buffering of the woodland (where possible), could also help to mitigate the impacts of development. The site is within 200m of a Local Wildlife Site and within 600m of the New Marston Meadows SSSI. The site is comprised of hardstanding, buildings, scrub and woodland. Part of the northern parcel is identified by Natural England as potentially containing Open Mosaic Habitat (a priority habitat). This would require a detailed botanical survey to determine presence/absence. Small areas of woodland in the southern parcel (mostly at the boundary) are also included on the priority Habitat Inventory. Potential protected species constraints include foraging and commuting bats, roosting bats (trees and buildings), badgers, and nesting birds. Existing trees on the site, some protected by TPOs.

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?

Criteria	SA rating	Comments
Archaeology	-	Potential for archaeological remains on the site. The Civil War Parliamentary siege line has been identified in Headington Hill Park, suggesting that it runs through the northern of the two plots. This would warrant protection through sensitive design if the line confirmed by trenching as it's the only part of the siege line confidently located to the east of the town.
Conservation Areas & Register of Parks and Gardens (RPG)	--	This site is in two parts. Part 1 (Government Buildings) is adjacent to the Headington Hill Conservation Area and Part 2 (Harcourt House) is within it. The whole site is opposite to the to St Clements and Iffley Road CA.
Listed Buildings	-	There are no listed buildings on the sites but the Grade II* Headington Hall sits within the park and St. Clements Church is nearby.

View Cones	-	The Headington Hill viewcone passes through Part 1 (Government Buildings) and South Park Viewcone passes to the south of Part 2 (Harcourt House). Significant view lines are indicated in the conservation area documents from Headington Hill Hall towards the site and along the paths at the back of Part 2 (Harcourt House).
Historic Core Area	0	<i>The site is outside the Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	Depends on implementation – if site brought forward for other uses than residential.
Diversifying the economy and employment opportunities	I	Depends on implementation – if site brought forward for other uses than residential .

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Marston Road
Can walking and cycling connections with the surrounding area be achieved?	Partially, via Marston road. Part 1 (Government Buildings) has potential for pedestrians access alongside the existing vehicle entrance. However, Part 2 (Harcourt House) does not currently have pedestrian access. There is the potential for pedestrian linkage between the sites where Cuckoo Lane and the Park meet the road. Good existing cycle connections from Marston Road to the city centre. Further plans to improve environment for cyclists from the County Council.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Yes - Large mature trees define the north and south edges of the site including a number of TPOs. A high hedge separates the site from the Marston Road and low trees and shrub define back edge Sites contain significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Various trees at the northern site are protected by OCC-Marston Road (No.1) TPO, 2000, and trees at the south site are protected within the Headington hill Conservation Area. Existing trees within the sites and adjacent to them will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity and the character and appearance of the conservation area
Are land contamination issues likely?	Potential for contamination at Government Buildings site (although site previously remediated, further investigations may be required). No known issues on Harcourt House site. Depending on proposed use, a site investigation and contamination risk assessment may be required to confirm absence of risks.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No significant issues identified – however, there are a number of historic environment/heritage constraints which would need to be carefully considered and addressed within the design of any scheme, including archaeological potential. Opportunities should also be sought to incorporate green features which can improve connectivity with neighbouring green spaces, as well as to retain significant green features on boundaries. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE4: Jesus College Sports Area

Site name	Jesus College Sports Area
SHLAA reference (and OLP2036 Policy if applicable)	234 and 026 (SP43)
Ward	Donnington
Total site size (ha)	234 = 0.8 026 = 0.55 Combined = 1.35
Existing use(s)	Open air sports

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner (2025) confirmed intention to develop for postgrad accommodation.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Several small patches of surface water flood risk present within site)

Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	-	<i>Unprotected open space</i>
Green belt?	0	<i>Site is not within GB</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Previously allocated for housing in part.</i>
Affordable housing provision	I	<i>Will depend on implementation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Not in or adjacent to regen. area</i>

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.

Criteria	SA rating	Comments
Community facilities	I	<i>Depending on the scale and type of housing delivered, there could be potential to require a small increase in community facilities, however, this would depend on implementation.</i>

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?

Criteria	SA rating	Comments
Public open space	I	<i>Site has potential to deliver public open space, but depends on implementation.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	>400m from bus stops located on Cowley Road – high frequency services including no's 1, 5, 10
Sustainable transport links (rail station)	-	>3500m from Oxford Railway station via Bartlemas Close and B480
Primary Schools	-	Over 800m from a primary school (East Oxford Primary)
Secondary Schools	+	>1,100m from Oxford Spires Academy
GP Surgeries	+	> 800m from Bartlemas Surgery and Cowley Road Medical Practice
Post office	+	>1000m from Donnington Post office
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	0	Ditch to south of site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., through retention of hedgerows, green roofs, walls, etc. Aerial imagery indicates the site is dominated by grassland subject to recreational use, with hedgerows flanking two boundaries. Potential protected species constraints are likely limited to nesting birds. The land is at the edge of a block of green space including the Lye Valley and Oxford Golf Course, and it would be beneficial for any development to deliver ecological enhancements onsite where possible. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments

Archaeology	-	Site contains no known archaeological sites. Roman kilns to the east at Oxford Spires, general potential for prehistoric and Roman would likely require assessment and evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	-	Adjacent to Bartlemas Conservation Area but within the Bartlemas Historic Hamlet.
Listed Buildings	-	No listed buildings onsite but within the setting of a no. of listed buildings – including Grade 2* Bartlemas Farm House and Bartlemas House and Grade 1 listed St Bartholomew Chapel – these buildings can be seen from within the site/ the site frontage on Bartlemas Close.
View Cones	-	Crescent Road View Cone across part of site
Historic Core Area	0	Outside the locally designated High Buildings 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in jobs for the knowledge economy
Diversifying the economy and employment opportunities	0	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from Bartlemas Close and Barracks Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes – Cycle route along the site's southern boundary – National Cycle Route 57. Walking connections to existing residential areas north and south of site via Bartlemas Close and Barracks Lane.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Ditch to southern boundary, outside of site. Site contains significant existing trees and hedgerows along the southern and western boundaries which are important to public amenity in the area and will provide valuable ecosystem services. 2 group of trees north of the pavilion in the western corner of the site are protected by the OCC -Bartlemas Close (No.1) TPO, 2006. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding area is primarily residential in nature.

Stage 2 conclusion

Although the site is protected open space it is in a suitable location for residential development. The site is adjacent to an existing CA and lies within an Historic Hamlet. Part of the site also lies within a view cone. Design sensitivity will be required in order to mitigate impacts on heritage assets. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE5: John Radcliffe Hospital

Site name	John Radcliffe Hospital
SHLAA reference (and OLP2036 Policy if applicable)	027, OLP2036 SP41
Ward	Headington Hill and Northway
Total site size (ha)	27.75
Existing use(s)	Hospital including A&E & associated uses, key worker accommodation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to stage 1b assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Site is available and viable for development. There are a number of planning permissions for the site, with some being implemented.
Does the landowner specify types of development	Landowner has expressed an interest in delivering some employer-linked affordable housing on site in addition to maintaining hospital-related uses. Site likely to be developed in phases as part of hospital restructuring within the Local Plan time period.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Patches of surface water flood risk present throughout site, with noticeably larger patches around the hospital buildings to the north west and south east.)
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is currently in use.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	1	Depends on implementation
Affordable housing provision	1	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.

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	<i>The site is not in a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>It is unlikely that the amount of community facilities will change.</i>

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?

Criteria	SA rating	Comments
Public open space	0	

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i><100m from several stops on site and in the immediate vicinity e.g. X3 City, 700, 10</i>
Sustainable transport links (rail station)	-	<i>Oxford Station (4.6 km)</i>
Primary Schools	+	<i>St Joseph's RC Primary School (750m)</i>
Secondary Schools	-	<i>Cheney School (1.7 km)</i>

GP Surgeries	+	<i>The Manor Surgery (500 m)</i>
Post office	-	<i>Marston Road (1.2 km)</i>
Air Quality	-	<i>Entire city is with AQMA</i>

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?

Criteria	SA rating	Comments
Water	--	<i>Watercourse (brook between car parks) on site and on site boundaries.</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity.</i> <i>The site boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from TVERC database.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>The eastern part of the site has significant potential because it incorporates parts of the medieval village of Headington. Significant new development in undisturbed areas may require evaluation.</i>
Conservation Areas &	--	<i>Outer comparatively less developed edge of site within Old Headington CA, with most of site directly adjacent.</i>

Register of Parks and Gardens (RPG)		
Listed Buildings	--	<i>Grade II listed Manor House, annex and boundary wall within site boundary on outer edge</i>
View Cones	0	<i>While not within view cones the site is very prominent in views across Oxford.</i>
Historic Core Area	0	<i>Not within high buildings area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	
Diversifying the economy and employment opportunities	0	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicular access already exists.
Can walking and cycling connections with the surrounding area be achieved?	Footpaths and cycleways connecting to the site, with links through the site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are some mature hedges on site. Site contains many significant existing trees. Some of the trees are protected by location within the Old Headington Conservation Area.
Are land contamination issues likely?	Investigation and risk assessment would be required due to current and historical use of land.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause	The site is located within an area of mixed character including residences, educational

disturbance or environmental issues such as noise or smells?	sites, and partly within the setting of heritage assets.

Stage 2 conclusion
Part of the site falls within a conservation area, with the remainder within the setting of this conservation area. The site contains a number of listed buildings on its outer edge. Design sensitivity will be needed to mitigate potential impacts on heritage assets at certain parts of the site. No insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE6: Land Surrounding St Clement's Church

Site name	Land Surrounding St Clement's Church
SHLAA reference (and OLP2036 Policy if applicable)	117 Policy SP18
Ward	St Clement's
Total site size (ha)	2.31ha
Existing use(s)	Greenfield land surrounding churchyard.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. The landowner (Magdalen College) has intention to develop
Does the landowner specify types of development	Primarily residential

Stage 1b conclusion
Consider further for allocation for residential-led development, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	A small area in the western part of the site, adjacent to the River Cherwell lies in Flood Zone 3a. Surface water flood risk south of the church.
Flooding of land	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1.

surrounding site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	-	The site is greenfield and will therefore not make use of previously developed land. The site can be defined as unprotected open space, surrounding a churchyard.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Landowner interest in housing, which is a suitable use for the site.
Affordable housing provision	+	Likely to deliver affordable housing (unless student accommodation).

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.

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not within one of the most deprived areas of Oxford.

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.

Criteria	SA rating	Comments
Community facilities	0	It is unlikely that any development will increase the provision of essential services and facilities on site. Facilities will remain the same.

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?

Criteria	SA rating	Comments
Public open space	+	<i>Likely that development would create additional public open space.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Bus stop outside site with buses 100 and X3 to city centre about 10min frequency</i>
Sustainable transport links (rail station)	-	<i>2.7km to Oxford Station</i>
Primary Schools	+	<i>c.750m to East Oxford Primary School</i>
Secondary Schools	-	<i>c.1.2km to Cheney School</i>
GP Surgeries	-	<i>Just over 800m from most of the site to St Clement's Surgery</i>
Post office	+	<i>Under 800m to St Clement's Post Office.</i>
Air Quality	-	<i>Whole city is within an AQMA</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Adjacent to Cherwell</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	The site is within 50m of Long Meadow Oxford City Wildlife Site (OCWS). Aerial imagery indicates the site is comprised of grassland, with scrub incursion from the hedgerows at the boundaries. The site is located at the edge of the central green corridor through Oxford (to the west) and areas of parkland and woodland (to the east). The River Cherwell is located immediately adjacent to the western boundary. One meadow in the surrounding landscape is identified by Natural England as priority habitat, another is identified as an OCWS. It should be a priority to establish the distinctiveness and condition of the grassland within the allocation site to understand the extent of constraint this provides to potential development. Potential protected species constraints include roosting bats (both in trees onsite and in the adjacent St Clement's Church), foraging and commuting bats, nesting birds, badger, reptiles, water vole and otter (associated with the River Cherwell). In addition, the River Cherwell is likely to be an important foraging and commuting resource for bats and should not be subject to any artificial illumination as a result of any proposed development. If St Clement's Church has the potential to support roosting bats, neither the church nor flightpaths to and from it should be subject to illumination either. A lighting strategy should be submitted in support of any planning application, setting out the lighting associated with the proposed development. This will need to account for both internal and external lighting.

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?

Criteria	SA rating	Comments
Archaeology	0	Site contains no known archaeological sites.
Conservation Areas & Register of Parks and Gardens (RPG)	--	The entire site is within the St Clement's and Iffley Road Conservation Area. The site is also adjacent to the Headington Hill Conservation Area and Central (University & City) Conservation Area.
Listed Buildings	-	The site is adjacent to St Clement's Church, which is Grade II* listed.
View Cones	--	<i>The site is partly within a view cone.</i>
Historic Core Area	0	<i>Site lies outside of the Historic Core Area.</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change expected.</i>
Diversifying the economy and employment opportunities	0	<i>No change expected.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	There is existing vehicular access via Marston Road; however this will need to be improved.
Can walking and cycling connections with the surrounding area be achieved?	Walking and cycling connections are already established within the area, however these could also be improved to better connect the site.

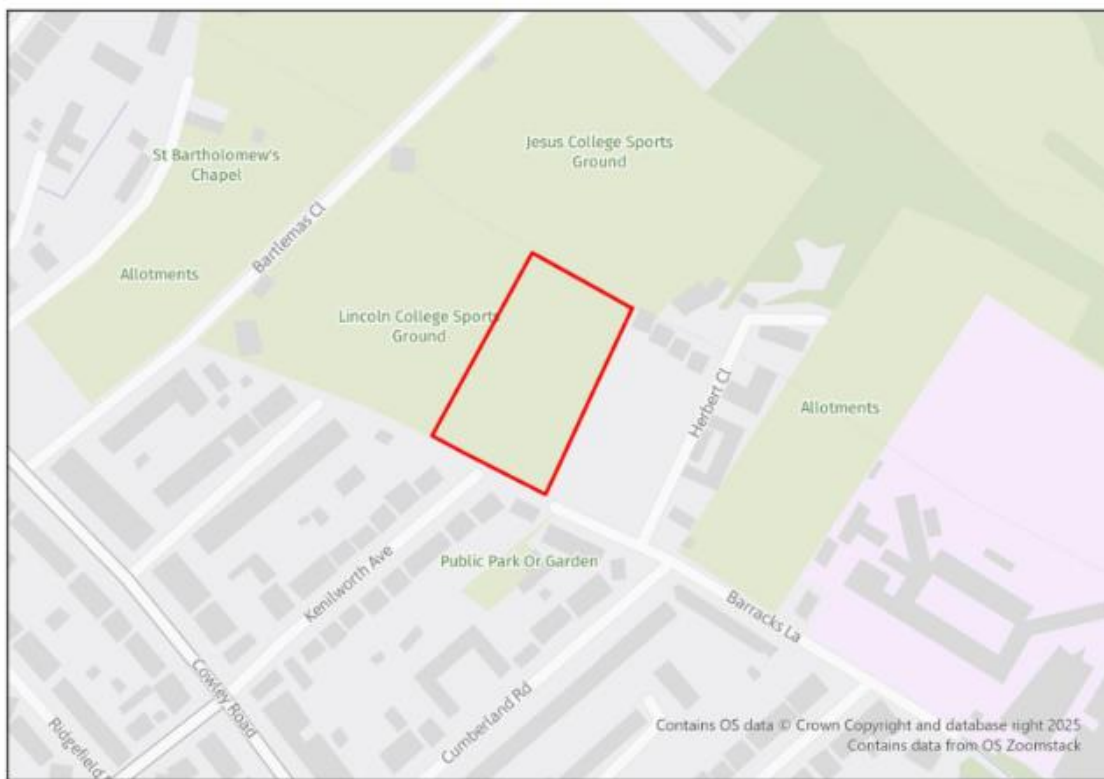
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	St Clement's Churchyard is adjacent to the site and contains a number of designated TPO's.
Are land contamination issues likely?	The current land use suggests contamination issues are unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to Magdalen College Sports Ground South.

Stage 2 conclusion
Site is greenfield land surrounding a churchyard and forming the setting of the adjacent listed building, it is also located within a conservation area and may have ecological sensitivities; new development will need to consider impacts and respond accordingly. There is some flood risk on the site and proximity to the watercourse will also need to inform design response. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE7: Lincoln College Sports Ground

Site name	Lincoln College Sports Ground
SHLAA reference (and OLP2036 Policy if applicable)	032 (SP40)
Ward	Donnington
Total site size (ha)	0.8ha
Existing use(s)	Open air sports

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner (2025) confirmed intention to develop for postgrad accommodation.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Several small patches of surface water flood risk present within site)
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	-	Unprotected open space
Green belt?	0	Site is not within GB

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?

Criteria	SA rating	Comments
Housing provision	++	Previously allocated for housing in part.
Affordable housing provision	I	Will depend 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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Not in or adjacent to regen. 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.

Criteria	SA rating	Comments
Community facilities	/	<i>Depending on the scale and type of housing delivered, there could be potential to require a small increase in community facilities, however, this would depend on implementation.</i>

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?

Criteria	SA rating	Comments
Public open space	/	<i>Site has potential to deliver public open space, but depends on implementation.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	>400m from bus stops located on Cowley Road – high frequency services including no's 1, 5, 10
Sustainable transport links (rail station)	-	>3500m from Oxford Railway station via Bartlemas Close and B480
Primary Schools	-	Over 800m from a primary school (East Oxford Primary)
Secondary Schools	+	>1,100m from Oxford Spires Academy
GP Surgeries	+	> 800m from Bartlemas Surgery and Cowley Road Medical Practice
Post office	+	>1000m from Donnington Post office
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	0	Ditch to south of site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity e.g., through retention of hedgerows, green roofs, walls, etc. Aerial imagery indicates the site is dominated by grassland subject to recreational use, with hedgerows flanking two boundaries. Potential protected species constraints are likely limited to nesting birds. The land is at the edge of a block of green space including the Lye Valley and Oxford Golf Course, and it would be beneficial for any development to deliver ecological enhancements onsite where possible. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	-	Site contains no known archaeological sites. Limited/ uncertain archaeological potential. Roman kilns to the east at Oxford Spires, general potential for prehistoric and Roman would likely require assessment and evaluation.
Conservation Areas &	-	Adjacent to Bartlemas Conservation Area but within the Bartlemas Historic Hamlet.

Register of Parks and Gardens (RPG)		
Listed Buildings	-	No listed buildings onsite but within the setting of a no. of listed buildings – including Grade 2* Bartlemas Farm House and Bartlemas House and Grade 1 listed St Bartholomew Chapel – these buildings can be seen from within the site/ the site frontage on Bartlemas Close.
View Cones	-	Crescent Road View Cone across part of site
Historic Core Area	0	Outside the locally designated High Buildings 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in jobs for the knowledge economy
Diversifying the economy and employment opportunities	0	No change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from Bartlemas Close and Barracks Lane
Can walking and cycling connections with the surrounding area be achieved?	Yes – Cycle route along the site’s southern boundary – National Cycle Route 57. Walking connections to existing residential areas north and south of site via Bartlemas Close and Barracks Lane.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Ditch to southern boundary, outside of site. Site contains significant existing trees and hedgerows along the southern and western boundaries which are important to public amenity in the area and will provide valuable

	ecosystem services. 2 group of trees north of the pavilion in the western corner of the site are protected by the OCC -Bartlemas Close (No.1) TPO, 2006. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding area is primarily residential in nature.

Stage 2 conclusion
Although the site is protected open space it is in a suitable location for residential development. The site is adjacent to an existing CA and lies within an Historic Hamlet. Part of the site also lies within a view cone. Design sensitivity will be required in order to mitigate impacts on heritage assets. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE8: Manzil Way Resource Centre

Site name	Manzil Way Resource Centre
SHLAA reference (and OLP2036 Policy if applicable)	SHLAA ref: #574 LP2036 ref: SP46
Ward	St Clement's
Total site size (ha)	0.75 ha
Existing use(s)	Administrative uses and health facilities

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	SHLAA records that: Leaseholder (Oxford Health NHS Foundation Trust) has indicated (2023) that site could be available for broad range of alternative uses if it were to be declared surplus to requirements. Not currently available but likely to be in plan period subject to wider estate reorganisation.
Does the landowner specify types of development	SHLAA records that: developer has indicated site would be suitable for broad range of alternative uses. LP2036 allocation establishes the site as being suitable for improved health-care facilities and associated administration; and/or residential development including employer-linked affordable housing

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1</i> <i>(Surface water flood risk present throughout site, particularly around the main buildings).</i>
Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is previously developed land with buildings in use on site.</i>
Green belt?	0	<i>Site is not designated as greenbelt.</i>

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?

Criteria	SA rating	Comments
Housing provision	I	<i>Depends on implementation. May be opportunity to deliver some housing during the plan period.</i>
Affordable housing provision	I	<i>Depends upon implementation.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within	0	<i>Site is not in or adjacent to a regeneration area</i>

the top 20% most deprived areas IMD)		

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*.

Criteria	SA rating	Comments
Community facilities	0	<i>It is unlikely that the amount of community facilities will change.</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Allocation would not lead to loss of public open space, though ability to provide 10% additional open space is unlikely due to size constraints of site.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>200 metres to bus stop on the Cowley Road</i>
Sustainable transport links (rail station)	-	<i>3km to train station</i>
Primary Schools	+	<i>550m to East Oxford Primary School</i>
Secondary Schools	-	<i>1.3km to Oxford Spires; 1.9km to Cheney School.</i>
GP Surgeries	+	<i>Bartlemas Surgery 92m</i>

Post office	-	<i>St Clements Street post office is 900m</i>
Air Quality	-	<i>Within city-wide AQMA</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Nothing notable nearby.</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>No international/national or local sites within 200m. Opportunity to link with area of green space/ park to the south of the site which could help enhance existing wildlife corridors/ green infrastructure/ ecological habitats. Potential for enhanced/ additional planting/ screening/ landscaping. Opportunities for 'green' communal areas. Opportunity to incorporate root protection areas for existing trees into overall scheme design.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>There is potential for Roman pottery as previously found near Cowley Road hospital.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Not within or on edge. Is to the west of the Bartlemas Conservation Area but not adjoining.</i>
Listed Buildings	0	<i>No listed buildings identified on Historic England mapper.</i>

View Cones	-	Majority of site falls within the Crescent Road View Cone.
Historic Core Area	0	Not within or on edge

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	
Diversifying the economy and employment opportunities	0	

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – via Manzil Way.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains existing trees and hedges which are collectively important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Unlikely
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	East Oxford Central Mosque lies to the north of the site.

Stage 2 conclusion
The site is brownfield land and has existing residential dwellings (their rear gardens) located to the east. No significant ecological constraints, though some potential heritage constraints as view cone crosses part of the site and site is close to the Bartlemas Conservation Area, which may need to be considered as part of the allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE9: Marston Paddock Extension

Site name	Marston Paddock Extension
HELAA reference (and OLP2036 Policy if applicable)	114e
Ward	Marston
Total site size (ha)	0.51
Existing use(s)	Vacant farmhouse and curtilage including outbuildings and parking area

Site location plan



Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes (2025 confirmed intention)
Does the landowner specify types of development	Yes – Residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	<i>Flood Zone 1</i>
Flooding of land surrounding site for access/ egress	0	<i>Safe access and egress to the site</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is previously developed land, as a farmhouse and curtilage, although with green features found within the site.</i>
Green belt?	--	<i>Site within Green Belt</i>

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?

Criteria	SA rating	Comments
Housing provision	++	
Affordable housing provision	+	

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	

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.

Criteria	SA rating	Comments

Community facilities	0	<i>Site not allocated for community facilities</i>

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?

Criteria	SA rating	Comments
Public open space	+	<i>Some new publicly accessible open space will be required as part of the 'golden rules' for Green belt release.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Bus stop about 400m with buses every 30mins</i>
Sustainable transport links (rail station)	-	<i>>1,600m from train station</i>
Primary Schools	-	<i>>800m from the nearest primary school</i>
Secondary Schools	-	<i>>800m from the nearest secondary school</i>
GP Surgeries	-	<i>>800m from the nearest GP surgery</i>
Post office	-	<i>>800m from nearest post office</i>
Air Quality	-	<i>While city within AQMA</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Site is not within 30m of a water body</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	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?

Criteria	SA rating	Comments
Archaeology	0	
Conservation Areas & Register of Parks and Gardens (RPG)	--	<i>Site within Old Marston Conservation Area</i>
Listed Buildings	0	
View Cones	0	
Historic Core Area	0	

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs/economic floorspace in knowledge-based economy</i>
Diversifying the economy end	0	<i>No change in employment base or access to affordable workspaces</i>

employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, from Butts Lane
Can walking and cycling connections with the surrounding area be achieved?	Site within existing urban area with existing pedestrian and cycle connections.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Some significant trees along boundaries and scattered within site, which have important to public amenity in the area and will provide valuable ecosystem services. The quality of existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Potential contamination risks from previous uses and waste materials including tyres and scrap cars. Full contamination risk assessment would be required to determine contamination risks and any remediation required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Surrounding uses are fields and Old Marston village, with the A40 relatively close.

Stage 2 conclusion
No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE10: Nuffield Orthopaedic Centre (NOC)

Site name	Nuffield Orthopaedic Centre (NOC)
SHLAA reference (and OLP2036 Policy if applicable)	042 SP20
Ward	Headington
Total site size (ha)	8.38
Existing use(s)	Hospital and medical research

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Within 200m of Rock Edge SSSI and 350m of Lye Valley SSSI.
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Some scope for intensification of the site for hospital uses but this is unlikely during the plan period as landowner is focusing on other sites within their ownership.
Does the landowner specify types of development	Healthcare, medical research

Stage 1b conclusion
Site is not available for residential development and whilst there is some scope for intensification of the site for hospital related uses, it is unlikely to be during the plan period. Continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (South-east quarter of site has a large area of surface water flood risk, with smaller patches interspersed across rest of site).

Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Buildings currently in use on site.</i>
Green belt?	0	<i>Not green belt land.</i>

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?

Criteria	SA rating	Comments
Housing provision	0	<i>Site would not provide new housing.</i>
Affordable housing provision	0	<i>Site not allocated for housing.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not within a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>It is unlikely that the amount of community facilities will change.</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Public open space remains the same due to allocation.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Less than 400m from multiple bus stops on Old Road and Windmill Road.</i>
Sustainable transport links (rail station)	-	<i>Site is more than 1600m from train station.</i>
Primary Schools	+	<i>Less than 800m from the nearest primary school with space (Wood Farm Primary School)</i>
Secondary Schools	+	<i>Less than 800m from Cheney School.</i>
GP Surgeries	-	<i>More than 800m to the nearest GP.</i>
Post office	+	<i>Less than 800m to Wood Farm Post Office.</i>
Air Quality	-	<i>Site is within an AQMA.</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Site is not within 30m of a water body.</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	<i>200m from Rock Edge SSSI. Within 350m of Lye Valley SSSI.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site has potential for archaeological interest as Roman remains have been found in the area.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Site is not in or on the edge of a conservation area or site on the RPG register</i>
Listed Buildings	0	<i>Site contains no identified historic building constraint</i>
View Cones	0	<i>Site lies outside a view cone</i>
Historic Core Area	0	<i>Site lies outside the City Council's locally designated Historic Core Area.</i>

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?

Criteria	SA rating	Comments

Employment Opportunities in the knowledge-based economy	I	<i>Depends on implementation.</i>
Diversifying the economy and employment opportunities	I	<i>Depends on implementation.</i>

Other constraints which could affect suitability of site for development

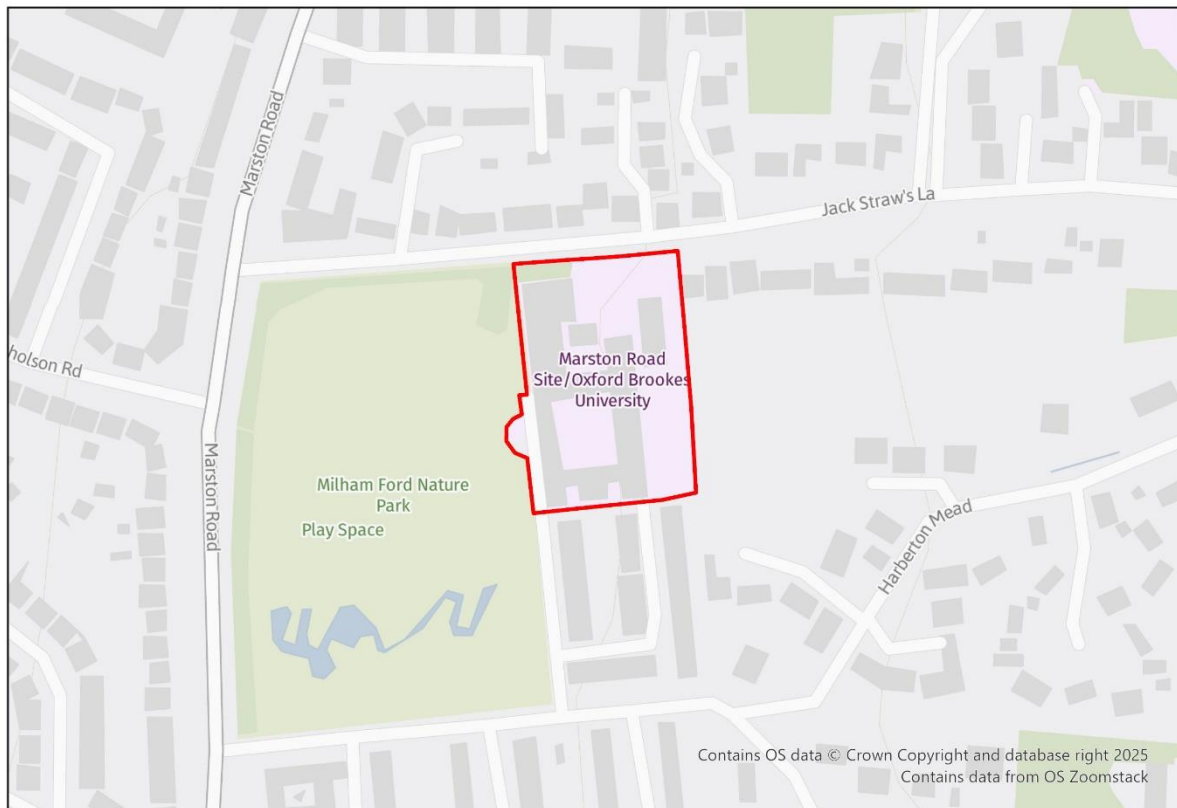
Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Mature trees on Old Road and Windmill Road frontages.
Are land contamination issues likely?	No
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
There are no significant conflicts with national policy or environmental or physical constraints to the development of this site, although the proximity of the site to two nearby SSSI's would need further consideration in any proposals that come forward; as well as potential for archaeological remains. The site is viable for intensification of medical related uses, although the landowners are currently focusing on other properties within the Trust. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE11: Oxford Brookes Marston Road Campus

Site name	Oxford Brookes Marston Road Campus
SHLAA reference (and OLP2036 Policy if applicable)	439 LP2036 Policy SP50
Ward	Headington Hill & Northway
Total site size (ha)	1.18 ha
Existing use(s)	Educational facilities

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner update 2025 - confirmed intention to retain for use for academic and research but may be available during plan period if surplus.
Does the landowner specify types of development	Academic and research uses.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (A significant proportion of the site is at risk from surface water flooding.)
Flooding of land	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

surrounding site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Yes.
Green belt?	0	Not in Green Belt.

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?

Criteria	SA rating	Comments
Housing provision	I	Landowner wishes to maintain the principle of institutional use and student accommodation use with a potential option to dispose for housing following a strategic review of its requirements. Site allocated for residential use including student accommodation in emerging plan, although delivery will be dependent on implementation.
Affordable housing provision	I	If residential development or student accommodation is brought forward on the site, then there is the potential to deliver some affordable housing through financial contributions.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most	0	Site is not in or adjacent to a regeneration area.

deprived areas IMD)		

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.

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Public open space	I	Depends on implementation.

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Sustainable transport links (bus stop)	+	<400m from bus stops on Jack Straws Lane.
Sustainable transport links (rail station)	-	>1600m from train station.
Primary Schools	+	<550m to the nearest primary school (St Michaels CE Primary)
Secondary Schools	-	>2,400m to the nearest secondary school (Cheney School)
GP Surgeries	-	>1600m from the nearest GP surgery (Brookes Medical Centre)
Post office	-	>850m from the nearest post office (Marston Road post office)
Air Quality	-	The whole city is 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?

Criteria	SA rating	Comments
Water	-	There are ponds within the nature park but over 30m distance.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Contains The Quad, part of Milham Ford Field and Quad Local Wildlife site. Both parcels of the LWS are included in the designation due to the presence of botanically rich unimproved grassland. The main 'Nature Park' should be excluded from any development area, while any development should be encouraged to retain the Quad as well. There may be an opportunity to fund ongoing and additional habitat management through any development. Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians, badgers, and invertebrates. Please note the current Biodiversity TAN also states: "Additional consideration shall be given to developments in the vicinity of the Lye Valley SSSI and the Milham Ford City Wildlife Site. An Infiltration Drainage and Pollution Control Scheme for roof and hard surfacing run-off is required where the development is in the catchment area of the above sites. This is because reduction in water entering the aquifer is threatening the survival of this nationally rare habitat. Applicants for development in this area should discuss the requirements with the Council at an early stage." If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e., at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	0	None identified
Conservation Areas & Register of Parks and Gardens (RPG)	-	The site lies over the boundary, but within the setting of the Headington Hill Conservation Area and thus has an important relationship to the conservation area which will need to be considered.
Listed Buildings	0	No statutory heritage assets on the site. Former school have been included on the OHAR (i.e. the local list). School has a fairly significant history and is identified as a landmark in the Oxford in its Landscape Setting document.
View Cones	0	The site sits just to the south of the Doris Field Memorial Park view cone which skirts north east corner of site and looks south west
Historic Core Area	0	No

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	Depends on implementation. Potential for research-related jobs to support the knowledge economy.
Diversifying the economy and employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes from north and south of site. However, roads offer limited capacity into site (narrow and fairly quiet). Site may be more suitable for car free development that would not put additional pressure on surrounding connections.
Can walking and cycling connections with the surrounding area be achieved?	Yes from north and south of the site – depending on layout of development, opportunity to establish and north/south connection through site (currently divided by the buildings)
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The car park to the north of the site is on two levels with a fairly substantial slope. The row of hedges and trees form a natural border along the western boundary as well as to the north of the site (which are characteristic of the length of Jack Straw's Lane) and could be easily retained. There is a medium-sized tree located within the car parking to the north of the site as well as a couple of other medium-sized trees along the borders on the southern frontage, also appears to be 2-4 trees in north-west corner behind hedge. The site and boundary contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from TVERC database. Site contains significant existing trees and hedgerows along the northern boundary and Jack Straws Lane frontage and also trees scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees will influence developable area of site and its capacity. The quality of all existing trees should be assessed against the criteria in table 1 of BS5837:2012 (or its latest iteration). High quality trees must be retained unless there is a robust over-riding policy-based justification. Moderate and low quality trees should be retained where it is feasible to do so. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	No major contamination issues likely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified.

Stage 2 conclusion

No significant issues identified – care will need to be taken around how the development impacts the LWS (the Quad) which is within the site and adjacent (Milham Ford Field). The site may be better suited to car free development, to reduce pressure on the surrounding access roads into the site from

the north and south. There may also be an opportunity to create a pedestrian/cycle route through the site.

The site sits within the setting of (adjacent to) the Headington Hill Conservation Area, and the design of any proposal will need to respond to this accordingly. Equally, whilst the former school building itself is not subject to designation, it is noted as a landscape feature in the Oxford Landscape Assessment with some positive architectural features that would preferably be retained in any development and guidance could be set out in the allocation.

Site to be put forward for allocation in Regulation 19 Local Plan.

SPE12: Rectory Centre

Site name	Rectory Centre
SHLAA reference (and OLP2036 Policy if applicable)	428
Ward	St Clement's
Total site size (ha)	0.21ha
Existing use(s)	Healthcare

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	Yes	0.21hectares

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has confirmed intention to redevelop site.
Does the landowner specify types of development	Landowner intends to redevelop for residential use subject to consolidation of existing uses onto alternative sites.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 <i>(Patch of surface water flood risk in south eastern corner of site.)</i>
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land (with buildings currently in use)
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site allocation proposes a minimum of 21 residential dwellings at the site.
Affordable housing provision	+	It is likely that affordable housing would be provided at policy compliant levels.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	-	Re-development of this site would lead to a loss of community healthcare facilities, policy includes mitigation and suggests that these should be re-provided elsewhere however the precise amount would depend on implementation and assessed need.

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?

Criteria	SA rating	Comments
Public open space	0	Site under 1.5ha. No requirement to provide public space on site. As such public open space likely to remain the same as a result of the allocation.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	The site is located <200m from a bus stop on Cowley Road that is frequently served by buses, including routes number 1, 5 and 10 and on Headington Road served by 8, 15, 108, 120, 275, N8, N400, ST2, X3, X20, X32.
Sustainable transport links (rail station)	-	Oxford Station is situated 2.5km from the site, a walk of >30 minutes.
Primary Schools	+	The site is located <800m from the nearest primary school (East Oxford Primary School)
Secondary Schools	-	The site is located >800m from the nearest secondary school (Cheney School).
GP Surgeries	+	The site is located <800m from the nearest GP surgery (Manzil Way)

Post office	+	The site is located <800m from the nearest post office (St Clements Street)
Air Quality	-	The entirety of Oxford is situated 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?

Criteria	SA rating	Comments
Water	0	The site is not within 30m of a body of water.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	The site is not within proximity to an area designated for its biodiversity value. Aerial images show the site is almost entirely developed land, bordered by a tree line to the east that is situated within private residential gardens.

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?

Criteria	SA rating	Comments
Archaeology	0	The site contains no known archaeological sites and has limited archaeological potential.
Conservation Areas & Register of Parks and Gardens (RPG)	0	The site is not in or on the edge of a conservation area or site on the RPG.
Listed Buildings	0	The site does not contain and is not near to any listed buildings.
View Cones	-	The site lies within the Crescent Road View Cone.
Historic Core Area	0	Not within 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	There would be no change in number of jobs/employment floorspace for the knowledge-based economy.
Diversifying the economy and employment opportunities	0	No change.

Other constraints which could affect suitability of site for development

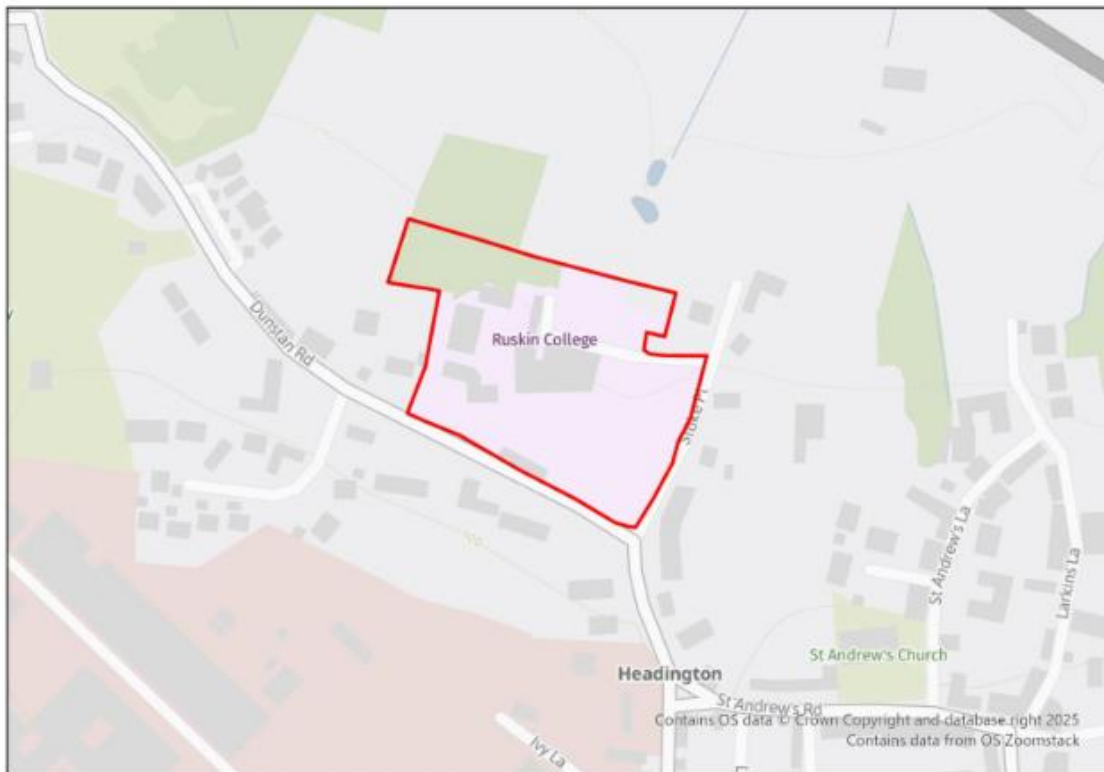
Can access for vehicles be achieved?	Site has existing vehicular access from Rectory Road and car parking spaces on southern boundary.
Can walking and cycling connections with the surrounding area be achieved?	Site has good walking and cycling connections with the surrounding area as it is located in the Cowley Road District Centre.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	The site does not contain any significant physical features that would impact upon potential redevelopment.
Are land contamination issues likely?	The site has potential contamination. Any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	All surrounding properties are residential in nature and the potential for disturbance or environmental issues is low.

Stage 2 conclusion
The site scores well overall against the sustainability criteria and there are limited constraints to development at this location. Consideration will need to be given as to the accommodation of existing healthcare facilities on alternative sites and to the likely necessity for remedial works. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE13: Ruskin Campus

Site name	Ruskin Campus
SHLAA reference (and OLP2036 Policy if applicable)	054 SP55
Ward	Headington
Total site size (ha)	1.86
Existing use(s)	University campus

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.
Does the landowner specify types of development	Approval has been granted for student accommodation on part of site (ref 22/00962/FUL), but work has not yet commenced.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses and planning consent issued. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (Patches of surface water flood risk present, particularly towards eastern end of site.)
Flooding of land surrounding	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Land is occupied by university buildings that are currently in use.</i>
Green belt?	0	<i>Site is not on green belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Proposed development is for student accommodation</i>
Affordable housing provision	0	<i>Affordable housing is not included in proposed development</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Not within a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Approved scheme does not include community facilities provision that is open to wider public</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Amount and accessibility of open space in development may be dependent on implementation</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	<i>Several bus stops in the vicinity, although they are not directly adjacent to site.</i>
Sustainable transport links (rail station)	-	<i>Rail station is 5km away</i>
Primary Schools	-	<i>Nearest primary school is 1100m away, although there is a special needs school nearer. (St Andrew's)</i>
Secondary Schools	-	<i>Nearest secondary school is 2000m away (Cheney School)</i>
GP Surgeries	+	<i>Approx 450m from The Manor Surgery</i>
Post office	-	<i>More than 800m from nearest Post Office.</i>
Air Quality	-	<i>Entire city is within an Air Quality Management Area.</i>

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?

Criteria	SA rating	Comments

Water	0	Site is over 30m away from nearest watercourse.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	The grounds comprise of extensive private open space, no specific ecological designations although with the location there is potential for linkages with adjoining greenfield and wildlife continuity. Dunstan Park wildlife site located to the west.

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?

Criteria	SA rating	Comments
Archaeology	-	The site is of archaeological interest with Iron Age activity and Roman pottery production having been recorded previously.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Entire site is within Old Headington CA.
Listed Buildings	--	Site contains Grade II listed Rookery (Ruskin College) and is in the setting of Grade II listed walled garden.
View Cones	0	Site is not within any view cones.
Historic Core Area	0	Site is outside of 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?

Criteria	SA rating	Comments
Employment Opportunities	0	Current and proposed uses are for higher education with no significant research activity expected.

in the knowledge-based economy		
Diversifying the economy and employment opportunities	0	<i>Current and proposed uses are for higher education with no significant research activity expected.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains several mature trees, and changes in level at various points.
Are land contamination issues likely?	No
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No ecological designations, but the site contains Grade II listed heritage assets within the site boundary.

Stage 2 conclusion
There are a number of physical and policy constraints, however these are not considered to be insurmountable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE14: Ruskin Field

Site name	Ruskin Field
SHLAA reference (and OLP2036 Policy if applicable)	463 SP56 (part of site)
Ward	Headington
Total site size (ha)	3.51ha
Existing use(s)	Field

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. The landowner has confirmed that the site is available.
Does the landowner specify types of development	Landowner intention to develop for residential.

Stage 1b conclusion
Landowner has expressed intention to develop for residential use - continue to the next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 <i>(Patches of surface water flood risk present in close proximity to watercourse)</i>

Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	-	Site is greenfield land (unprotected open space).
Green belt?	0	Site is not in the Green Belt.

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?

Criteria	SA rating	Comments
Housing provision	++	The developer has expressed the intention to develop a minimum of 28 dwellings.
Affordable housing provision	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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most	0	Site is not in or adjacent to a regeneration area.

deprived areas IMD)		

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.

Criteria	SA rating	Comments
Community facilities	0	Site is not allocated for community facilities so would remain the same.

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?

Criteria	SA rating	Comments
Public open space	+	10% public open space on site likely achievable as housing allocation

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	> 400m to the nearest bus stops. Halliday Hill stop is 1000m away connecting to Risinghurst (Service 14). Headington Shops is 1000m away connecting to the City Centre (Services 8, 400, X20). John Radcliffe Main Entrance is 1100m away with multiple destinations (including Services 10, 14, 600).
Sustainable transport links (rail station)	-	>1600m to Oxford Train Station (over an hour's walk).
Primary Schools	-	>800m to the nearest primary school (New Marston, St Andrews).
Secondary Schools	-	>800m to the nearest secondary school (Cheney).
GP Surgeries	+	<800m to the nearest GP surgery (The Manor Surgery).
Post office	-	>800m to the nearest post office.

Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	--	There is a pond to the south of the site, and a ditch that runs through the site to this.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Contains no nature conservation designations but has potential for nature conservation interest. Site is located within close proximity to Dunstan Park wildlife site.</i> <i>Aerial imagery indicates the site is comprised of grassland and hedgerows/tree lines. There is potentially a wetland element given the springs, seepages, and ponds in the surrounding area. This should be established through detailed botanical survey.</i> <i>Potential protected species constraints include roosting bats, foraging and commuting bats, breeding birds, reptiles, amphibians and invertebrates. The site contains Section 41 (Priority/Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from the TVERC database.</i> <i>Site contains significant existing trees and hedgerows around boundaries of site and marking historic field boundaries, and also individual trees and groups of trees scattered within the site, which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by location within the Old Headington Conservation Area. Hedgerows are potentially "important" under the Hedgerow Regs. Existing trees and hedgerows will influence developable area of site and its capacity. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Evidence of Iron Age activity and Roman pottery production has been recorded from this site, so it has significant archaeological potential.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	--	<i>The site is entirely within the Old Headington Conservation Area.</i>
Listed Buildings	--	<i>There is a Grade II listed wall to the south of the site (Walls of Walled Garden at Ruskin College). The site lies within the settings of a number of other listed buildings: The Rookery (Ruskin College), Grade II, Stoke House, Grade II listed, 8 Dunstan Road, Grade II listed, The Manor Farmhouse and Garden Wall of Manor Farmhouse, both Grade II, Church of St Andrew, Grade II*.</i>
View Cones	0	<i>The site is not within the city's view cones.</i>
Historic Core Area	0	<i>Not within historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs.</i>
Diversifying the economy	0	<i>No change.</i>

end employment opportunities		

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	There is currently no vehicle access to the site. Foxwell Drive is adjacent to the site and therefore access could be created to the site from there.
Can walking and cycling connections with the surrounding area be achieved?	Improved walking and cycling connections are likely to be required.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees and hedgerows around boundaries of site and marking historic field boundaries, and also individual trees and groups of trees scattered within the site, which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by location within the Old Headington Conservation Area. Hedgerows are potentially "important" under the Hedgerow Regs.
Are land contamination issues likely?	Current land use suggests that land contamination issues are unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The A40 (Oxford ring road) is at the northern boundary of the site which may cause disturbance such as noise and pollution. Mitigation may be necessary to minimise these impacts.

Stage 2 conclusion
Overall the site scores fairly well against the criteria. No significant heritage concerns although design sensitivity likely to be required as the site is within a conservation area and there is a listed wall to the south of the site. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE15: Slade House

Site name	Slade House
SHLAA reference (and OLP2036 Policy if applicable)	124 Policy SP57
Ward	Lye Valley
Total site size (ha)	1.31 Ha
Existing use(s)	Former NHS care facility currently used for staff training and office accommodation, owned by Oxford Health NHS Trust

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes, site expected to be developed within Local Plan period.
Does the landowner specify types of development	Landowner has expressed an interest in redeveloping site if is surplus to requirements following wider estate re-organisation. Specified uses are improved healthcare facilities and associated administration and/ or residential development including employer linked affordable housing.

Stage 1b conclusion
Consider further for allocation for improved healthcare facilities, associated administration and/ or residential development including employer linked affordable housing. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1</i> <i>(Patches of surface water flood risk present, particularly towards the east of the site).</i>
Flooding of land surrounding site for access/ egress	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is mainly PDL.</i>
Green belt?	0	<i>Site is not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	I	<i>Potential for delivery of some housing at this site but precise amount will depend on implementation.</i>
Affordable housing provision	I	<i>Potential for delivery of some affordable housing tenures at this site but precise amount will depend on implementation.</i>

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.*

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in or adjacent to a regeneration area.</i>

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*.

Criteria	SA rating	Comments
Community facilities	0	<i>Unlikely to be any change in community facilities as result of this allocation.</i>

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?

Criteria	SA rating	Comments
Public open space	I	<i>Site is only slightly larger than threshold (1.5ha) for delivery of 10% public open space on site. Whether public open space is provided on site will depend on how site is brought forward.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Nearest bus stop is the corner house. Frequent services to the city and other destinations. E.g. 10, 100, 600, NU5, OX7, U5 Brookes.</i>
Sustainable transport links (rail station)	-	<i>Oxford Station (5.9 km)</i>
Primary Schools	-	<i>Tyndale School (1.4 km)</i>

Secondary Schools	-	Cheney School (2.4 km)
GP Surgeries	+	Wood Farm Health Centre (500m)
Post office	-	Wood Farm Post Office (900m)
Air Quality	-/--	Air quality hotspot is nearby (on Eastern Bypass Ring Road), although this is probably far enough from site to alleviate any direct impacts.

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?

Criteria	SA rating	Comments
Water	0	Site is not near 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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	Site allocation policy requires assessment of potential recreational pressure on nearby Brasenose and Shotover SSSI which may include onsite mitigation measures. Aerial imagery indicates the site contains developed land and associated amenity habitats. Potential protected species constraints are likely limited to roosting bats and nesting birds. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area.

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?

Criteria	SA rating	Comments

Archaeology	-	<i>Parliamentarian siege line may cross through this plot. May require evaluation depending on build footprint.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Not within conservation area</i>
Listed Buildings	0	<i>No listed buildings on site</i>
View Cones	0	<i>Not within view cones</i>
Historic Core Area	0	<i>Not within historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	1	<i>Site is currently mainly used for admin and training purposes. Depends upon implementation whether the site allocation will result in any net change.</i>
Diversifying the economy and employment opportunities	0	<i>Site is currently mainly used for admin and training purposes, diversification of use unlikely with allocated uses.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access already exists.
Can walking and cycling connections with the surrounding area be achieved?	Footpaths and cycleways run in front of the site (Horspath Driftway)
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are some mature trees and mature hedges on site. Site contains scattered significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by the OCC - Horspath Driftway/Eastern By-Pass (no.1) TPO, 1994. Existing trees will influence developable

	area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	No significant contamination issues likely but might need further investigation.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site located in a residential area, including student accommodation adjoining northern boundary.

Stage 2 conclusion
There are no significant constraints to development on the site. The site should be considered further for allocation subject to any additional work informing Regulation 19 Local Plan. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE16: Thornhill Park (Phase 2)

Site name	Thornhill Park (phase 2)
SHLAA reference (and OLP2036 Policy if applicable)	38a2 LP2036 SP47
Ward	Barton and Sandhills
Total site size (ha)	3.39 ha
Existing use(s)	Former offices & landscaping

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	Yes	Planning permission (21/01695/FUL) for mixed use residential, hotel, car parking and sport grounds, not yet implemented.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – planning permission and confirmed intention to develop
Does the landowner specify types of development	Yes

Stage 1b conclusion
Landowner has set out intentions for residential development. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 There are some small patches of surface water flood risk to the north of the site close to the London Road and a couple of smaller patches further south.
Flooding of land surrounding site for access/ egress	0	There is safe access/ egress from the site – area surrounding site is in Flood Zone 1.

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?

Criteria	SA rating	Comments
Previously developed land?	0	Part previously developed, part greenfield
Green belt?	0	Site is not within the green belt.

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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for residential development and would provide more than 10 homes.
Affordable housing provision	+	Site expected to deliver affordable housing in line with policy.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site outside of 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.

Criteria	SA rating	Comments
Community facilities	-	Allocation would lead to a loss of community facilities. However, the existing pavilion is 25 years old and at the end of its lifespan, unable to comfortably accommodate the needs. The loss is considered acceptable provided a contribution is made towards a replacement pavilion as set out in the previous planning permission.

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?

Criteria	SA rating	Comments
Public open space	+	Given site size, site expected to deliver at least 10% open green space.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Less than 400m from Thornhill Park and Ride.
Sustainable transport links (rail station)	-	>1,600m from Oxford Railway Station
Primary Schools	-	>800m from the nearest primary school (Barton Park Primary)
Secondary Schools	-	>800m from the nearest secondary school (Cheney School)
GP Surgeries	-	>800m from the nearest GP surgery
Post office	+	<800m from the nearest post office
Air Quality	-	Whole city 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?

Criteria	SA rating	Comments
Water	-	Watercourse running along eastern boundary of the site

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Previous ecological assessments indicate the site is comprised of species-poor grassland, scattered trees, scrub, and developed land. It contains a medium population of great crested newt (GCN) and multiple bat roosts. Updated surveys would be required in support of any planning application, while both GCN and bats are European Protected Species and therefore any consented development would only be able to proceed under licence from Natural England. Other potential protected species constraints include reptiles, nesting birds, and badgers. Site contains significant existing trees around the boundaries and scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. All trees within the site are protected by the OCC - London Road (No.1) TPO, 1994. Existing trees will influence developable area of site and its capacity. The site is not designated for its nature conservation value. However, it is located in close proximity to the CS Lewis Nature Reserve and any planning application must assess the potential for recreational impacts on this site and agree suitable mitigation measures for any impact. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. Opportunities exist to plant new trees to improve connectivity within GI network. Create or enhance suitable flower-rich grassland habitats with plentiful populations of violets and light patches of scrub for the Dark Green Fritillary Create new areas of lowland meadow by creating and restoring meadows in suitable locations (particularly on floodplains) Create areas of species-rich acid grasslands in suitable locations Create new areas of heathland on suitable soil types.

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?

Criteria	SA rating	Comments
Archaeology	0	The site has been evaluated for the recent planning application and no significant archaeology was identified.
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site outside conservation area
Listed Buildings	0	Site contains no listed building constraint however Grade II listed milestone located close to the site (in the central reservation of the A40).
View Cones	0	Site outside the locally designated view cones
Historic Core Area	0	Site lies outside the locally designated high buildings 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy.
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes - Existing access from the A40
Can walking and cycling connections with the surrounding area be achieved?	Yes

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees around the boundaries and scattered within the site which are important to public amenity in the area and will provide valuable ecosystem services. All trees within the site are protected by the OCC - London Road (No.1) TPO, 1994. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area
Are land contamination issues likely?	Site investigations would be required due to previous use and potential contamination risks. Extensive investigations works completed over parts of site already?
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
The site itself has limited constraints for development. Design sensitivity will be required, as development in the southern part of the site could have a visual impact on open countryside, and there are also ecological sensitivities in terms of protected species and proximity to local ecological site that would need to be addressed. Unless the consented scheme is implemented, the site should be considered further for a mixed-use including residential allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE17: Union Street Car Park

Site name	Union Street Car Park
SHLAA reference (and OLP2036 Policy if applicable)	061
Ward	St Clement's
Total site size (ha)	0.24
Existing use(s)	Public Car park

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	No live planning application.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Residential and/or student accommodation

Stage 1b conclusion
Developer has expressed intent to develop. Site should be considered for allocation for residential use, continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site and immediate surrounding areas are in Flood Zone 1. (An area of surface water flood risk runs along the length of Collins Street, forming the northern boundary of the site and extending down the eastern and western boundaries).

Flooding of land surrounding site for access/ egress	0	<i>Site and immediate surrounding areas are in Flood Zone 1.</i>

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?

Criteria	SA rating	Comments
Previously developed land?	+	<i>Site is in use as a car park.</i>
Green belt?	0	<i>Site is not on green belt land.</i>

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?

Criteria	SA rating	Comments
Housing provision	I	<i>Landowner has expressed intention of developing site as residential or student accommodation</i>
Affordable housing provision	I	<i>Landowner has expressed intention of developing site as residential or student accommodation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in a ward that is in or adjacent to a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	I	Community facility (supermarket) already exists on site, provision will depend 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?

Criteria	SA rating	Comments
Public open space	0	Site allocated for housing – dependent on implementation but open space can be provided.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Several bus stops along Cowley Road, with a wide range of routes
Sustainable transport links (rail station)	-	Site is 2.7km from Oxford Rail Station
Primary Schools	+	Site opposite East Oxford Primary School
Secondary Schools	-	Nearest state secondary school is 1.12km
GP Surgeries	+	Nearest GP is in St Clements (approx 600m away)
Post office	+	Nearest Post office is approx 600m away
Air Quality	-	Entire city is within 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?

Criteria	SA rating	Comments
Water	0	No watercourses nearby

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	No designations onsite, site is c.200m from South Park which is core in GI network. Not much potential for linkages with wider network other than providing for local amenity.

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?

Criteria	SA rating	Comments
Archaeology	0	No known archaeological sites or potential
Conservation Areas & Register of Parks and Gardens (RPG)	0	Site is not in a conservation area.
Listed Buildings	0	No listed buildings on site.
View Cones	-	Site is within Crescent Road view cone
Historic Core Area	0	Site is outside Historic core.

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?

Criteria	SA rating	Comments

Employment Opportunities in the knowledge-based economy	0	<i>Site is not promoted for employment or knowledge economy uses, but residential so no impact expected on quantity of employment floorspace.</i>
Diversifying the economy and employment opportunities	0	<i>Site is not promoted for employment or knowledge economy uses, but residential so no impact expected on quantity of employment floorspace.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, although this may be affected by LTNs.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Site investigation would be required due to previous use and slight potential contamination risks.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No insurmountable obstacles to development, though sensitivity in respect to the view cone should be addressed. Site to be put forward for allocation in Regulation 19 Local Plan.

SPE18: Warneford Hospital

Site name	Warneford Hospital
SHLAA reference (and OLP2036 Policy if applicable)	#063 LP2036 Policy SP22
Ward	Headington
Total site size (ha)	8.67ha
Existing use(s)	Hospital, research, playing fields

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	Site is currently subject to an undetermined application (25/01859/OUTFUL) Previous applications, relating to Intensive Care Annex (21/00302/FUL)

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2025 – landowner confirmed intention to develop surplus areas
Does the landowner specify types of development	Current allocation establishes site as suitable for healthcare related facilities primarily plus other uses inc residential and student accommodation, academic research, B1 uses with a link and education.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1

		Patches of surface water flood risk present in the south-west of the site and also some smaller patches around the north-east boundaries.
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is currently in use as a hospital and research centre, but does include some undeveloped green space. Some green infrastructure on the site.
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	0/1	<i>Site is primarily a non-residential allocation however policy E1 allows housing delivery on employment sites if landowner sought this.</i>
Affordable housing provision	1	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.*

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	<i>The site is not within a Regeneration Area. (Site lies largely within an area that is less deprived than 74% of neighbourhoods – IMD 2025)</i>

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.

Criteria	SA rating	Comments
Community facilities	I	Provision of community facilities will depend on implementation of uses.

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?

Criteria	SA rating	Comments
Public open space	I	Site has potential for providing public open space, but precise type and quantum will depend on implementation.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<100m from bus stop with frequents services (Roosevelt Drive)
Sustainable transport links (rail station)	-	Oxford Station (3.9 km)
Primary Schools	-	1.6 km from Wood Farm Primary School
Secondary Schools	+	250m from Cheney School

GP Surgeries	-	About 1.4km from Bartlemas Surgery, Cowley Medical Centre
Post office	-	St Clements St Post Office (1.6 km)
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	0	Nothing notable within 30m, although the site lies within the catchment area of Lye Valley SSSI, which contains important peat deposits and as a result is particularly sensitive to impacts to groundwater flows and other changes to hydrology.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Site is adjacent to OCWS – Warneford Meadows and Orchard Potential for protected species constraints in the site likely include roosting bats, foraging and commuting bats, nesting birds, and reptiles. Site sits between two green corridors, and onsite there are several mature trees, lawns and hedges, and a playing field. Proposals should consider what connectivity the site provides to protected species and seek to preserve and enhance existing permeability through the site.

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?

Criteria	SA rating	Comments
Archaeology	-	Site is of archaeological interest for potential Roman remains. This will require further investigation as part of any redevelopment.
Conservation Areas &	-	Adjoins Headington Hill CA

Register of Parks and Gardens (RPG)		
Listed Buildings	--	Various elements of the hospital complex are Grade II listed (the main hospital building, ancillary annexes (mortuary, nurses home, and chapel), front garden wall including lodge and piers)). Warneford Meadow nearby is on the Oxford Heritage Asset register.
View Cones	0	Site not within a view cone
Historic Core Area	0	Site not within 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	Hospital use and research centre likely to remain onsite, expansion or otherwise depends on implementation of development plans.
Diversifying the economy and employment opportunities	I	No indication on diversification of employment use on the site

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes via Roosevelt Road. Boundary wall and gate piers are at least partially covered by the listing so creating new access points will be difficult to deliver.
Can walking and cycling connections with the surrounding area be achieved?	Existing connections and routes to site are established. No segregated cycle paths through the site. Pedestrian walkways limited outside of built footprint. Car movement is currently prioritised through site.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains extensive greenspace around that makes a noticeable contribution to the setting and creates a character that is less institutional than nearby Churchill Hospital. Site contains significant existing trees scattered across the site which are important to public amenity in the area and will

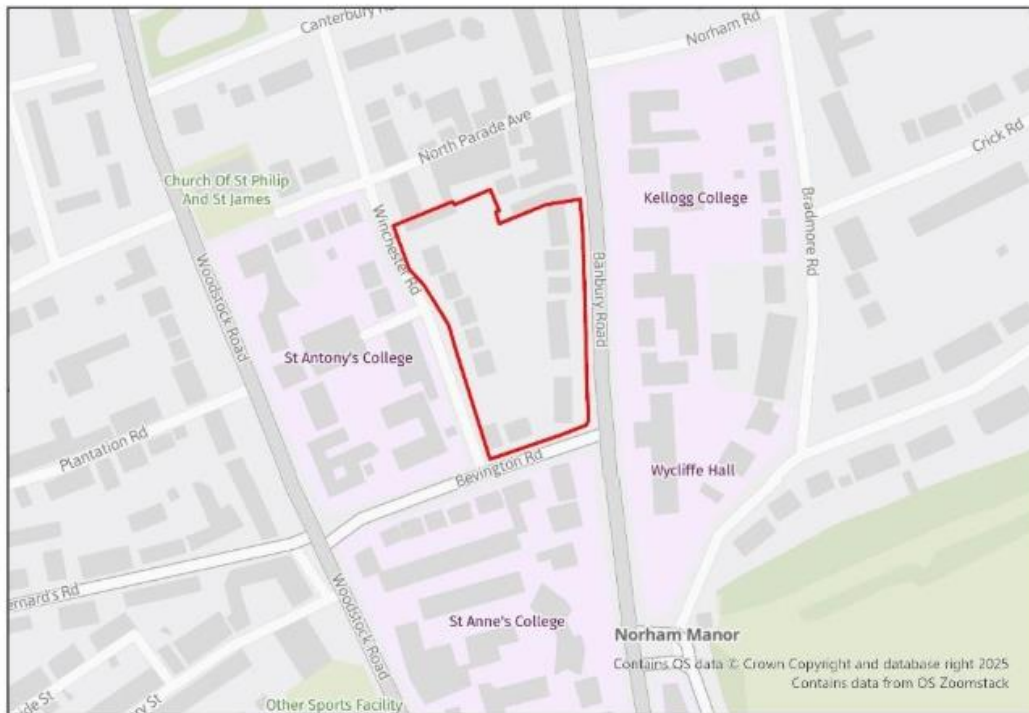
	provide valuable ecosystem services. Existing trees are protected by the OCC - Warneford Hospital (No.1)TPO, 1994 and the OCC -Warneford Hospital (no.1) TPO, 1994. There is an orchard adjacent to the south eastern boundary of the site. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity and enhance the setting of the Listed Buildings. Within 200m of peat reserves potentially
Are land contamination issues likely?	Although significant contamination is not expected, a site investigation will be required.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Wildlife site adjoins site, residential dwellings on east and west boundaries. Hospital uses likely to be retained onsite.

Stage 2 conclusion
There are heritage sensitivities including presence of listed buildings and adjacent conservation area; ecological sensitivities including adjacent local wildlife site and potential for protected species on site; as well as presence of protected trees on the site which will need to be addressed through appropriate mitigation requirements as part of any allocation. These are not considered insurmountable. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW1: Banbury Road University Sites – Parcel B

Site name	Banbury Road University Sites - Parcel B
SHLAA reference (and OLP2036 Policy if applicable)	006b Policy SP31
Ward	Walton Manor
Total site size (ha)	1.26
Existing use(s)	Academic and student accommodation

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	Yes	22/02849/FUL - provision of student accommodation (130 student rooms) and an

planning process (development commenced)?		academic building approved November 2024.

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – the planning application approved in November 2024 indicates there is landowner intention to develop.
Does the landowner specify types of development	The approved planning application is for student accommodation and academic use.

Stage 1b conclusion
Confirmed landowner intent, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	<i>Site is in Flood Zone 1</i> <i>(Patches of surface water flood risk present within site)</i>
Flooding of land surrounding site for	0	<i>There is safe access/egress from the site – area surrounding site is Flood Zone 1</i>

access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>The site is previously developed land with buildings in use on site.</i>
Green belt?	0	<i>Site is not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>The site has planning permission for the provision of 130 student rooms (C3 equivalent: 52 dwellings)</i>
Affordable housing provision	0	<i>Site is allocated in LP2036 for housing (including student accommodation) and other uses which typically would not provide affordable housing. The recent planning approval also does not make provision for affordable housing. Policy compliant affordable housing delivery.</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 90% of neighbourhoods in England – IMD 2025).</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Site not allocated for community facilities and the recent planning approval only included development relating to student accommodation and academic facilities.</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>The amount of public open space is likely to remain the same due to the allocation.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>The site is less than 400m from a bus stop. The nearest one is the Bevington Road bus stop on Banbury Road which is 200m away. Buses along Banbury Road are frequent and include the 2, 2A, S4, S5 and S7.</i>
Sustainable transport links (rail station)	-	<i>Over 1600m from the nearest rail station (Oxford)</i>
Primary Schools	+	<i>Less than 800m from the nearest primary school (St Barnabas C of E Primary School is 650m away)</i>
Secondary Schools	-	<i>More than 800m from the nearest secondary school (Cherwell School). Most of the schools within 800m are private/independent schools.</i>
GP Surgeries	+	<i>Less than 800m from the nearest GP surgery (Jericho Health Centre/ Observatory Medical Practice are 550m away).</i>
Post office	+	<i>Less than 800m from the nearest post office (St Giles is 500m away)</i>
Air Quality	-	<i>Site is within an Air Quality Management Area (AQMA)</i>

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?

Criteria	SA rating	Comments
Water	0	<i>Site is not within 30m of a water body</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	<i>Contains no nature conservation designations but surveys undertaken (in association with planning application 22/02849/FUL) identified numerous bat roosts on part of the site bounded by Bevington Road.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site is of archaeological interest as it is located on the line of a Bronze Age linear barrow cemetery and there is potential for prehistoric and Roman remains.</i>
Conservation Areas & Register of Parks and Gardens (RPG)	--	<i>The site lies entirely within the North Oxford Victorian Suburb Conservation Area.</i>
Listed Buildings	--	<i>There is one Grade II listed building within the site located at 59 Banbury Road. There are several other Grade II listed buildings within the vicinity of the site, notably across the other side of Banbury Road including Wycliffe Hall, Wykeham House, 60 and 62 Banbury Road and Gees' Restaurant immediately adjacent to the north of the site.</i>
View Cones	0	<i>Site lies outside of a view cone</i>
Historic Core Area	0	<i>Site lies outside the City Council's locally designated Historic Core Area.</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in number of jobs/economic floorspace in knowledge-based economy</i>
Diversifying the economy and employment opportunities	0	<i>No change in employment base or access to affordable workspaces</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Site is already accessible by vehicle from Banbury Road.
Can walking and cycling connections with the surrounding area be achieved?	Site is bounded by pedestrian and cycle connections on Banbury and Woodstock Road.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	There are a considerable number of trees across the site, particularly around its perimeter but no other topographical constraints. One of the trees (in front of 10 Winchester Road) is protected by a Tree Preservation Order.
Are land contamination issues likely?	There are no likely land contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site adjoins residential and educational uses, so design sensitivity would be required.

Stage 2 conclusion
The site scores well overall against the sustainability criteria and has good access to sustainable transport links. However, design sensitivity is likely to be required due to the site's location within a conservation area, and the high number of listed buildings around the site, as well as the Listed Building within it.

Site to be put forward for allocation in Regulation 19 Local Plan (unless construction has commenced in the meantime).

SPCW2: Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel

Site name	Botley Road sites around Cripsey Road including River Hotel and Westgate Hotel
SHLAA reference (and OLP2036 Policy if applicable)	(613) - 0.34ha 3-15 Botley Road and The River Hotel (614) - 0.31ha Land at Cripsey Place (615) - 0.19ha Westgate Hotel, Botley Road and 3-7 Mill Street
Ward	Osney & St Thomas
Total site size (ha)	0.84ha
Existing use(s)	Mixed uses including hotel with associated car park, residential dwellings and retail unit (courier service).

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Landowner indicates interest in mixed use development, including residential use.

Stage 1b conclusion
Landowner has confirmed intention to develop the site . Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	Three of the four parcels partly lie within Flood Zone 3a, whilst the parcel to the southeast (south of Botley Road and east of Mill Street) lies within Flood Zone 2. Flood Zone 2 is prevalent within all four parcels. Small area of surface water flood risk present within most southwestern parcel (north of Botley Road and west of Mill Street).
Flooding of land surrounding site for access/egress	--	Site is adjacent to Osney Bridge. Mill Street and Park End Street are other access routes and are within Flood Zone 2.

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?

Criteria	SA rating	Comments
Previously developed land?	0	Buildings are occupied and in use.
Green belt?	0	Site is not in green belt.

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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for residential development and would provide more than 10 homes.
Affordable housing provision	+	Site has potential to deliver policy compliant affordable housing

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site is not in a regeneration area.</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Community facilities unlikely to change resulting from allocation</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Public open space unlikely to change resulting from allocation.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Site is in a very central location and opposite to city's key transport hub so a variety of options are available, including buses, taxis and rail links.</i>
Sustainable transport links (rail station)	+	<i>Site is opposite Oxford railway station.</i>
Primary Schools	+	<i>Nearest primary school is West Oxford Community School, approx 650m.</i>

Secondary Schools	-	Nearest secondary school is over 800m from the site.
GP Surgeries	+	Nearest GP is located 800m away (Beaumont Street)
Post office	-	Nearest Post office located more than 800m away
Air Quality	-	Entire city is designated as 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?

Criteria	SA rating	Comments
Water	-	Western edge of site is directly adjacent to Thames/Isis watercourse.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	No ecological designations on site or adjacent. Given part of the site's location adjacent to watercourse and associated riparian habitat potential for a variety of protected species. Appropriate ecological surveys should be undertaken. A lighting strategy may be required along the river. The mature trees adjacent to the river should be protected. A 10m watercourse buffer should be maintained along the river or reinstated where possible. Any habitat delivery should be reflective of the River Thames context (i.e., providing for species such as otter and bats with natural vegetation along the river boundary). Habitat would benefit from being delivered along the river corridor, with habitat retained and enhanced in line with the LNRS. Whole site covered by LNRS.

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site is wholly located within City Centre Archaeological Area</i>
Conservation Areas & Register of Parks and Gardens (RPG)	-	<i>Part of the site allocation located adjacent to Osney Town CA</i>
Listed Buildings	0	<i>Site contains no listed buildings.</i>
View Cones	-	<i>Site within a View Cone (Boar's Hill)</i>
Historic Core Area	-	<i>Site is within Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	<i>No change in knowledge economy jobs</i>
Diversifying the economy and employment opportunities	0	<i>Wider employment opportunities unlikely to change through redevelopment.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	sites would likely require a site investigation and contamination risk assessment if re-developed to a sensitive end-use.

Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	The site is adjacent to a mainline railway track. The immediate surrounding area is of mixed character comprising of residential dwellings, hotels and some commercial uses.

Stage 2 conclusion
Site is in a sustainable and accessible location. There are several considerations including flood risk and above and below ground heritage, however these are not insurmountable and are likely be able to be addressed through appropriate further investigation/ mitigation at the planning application stage. Site should be allocated for a residential-led scheme (housing). Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW3: Canalside Land, Jericho

Site name	Canalside Land, Jericho
SHLAA reference (and OLP2036 Policy if applicable)	011 Policy SP33
Ward	Jericho and Osney
Total site size (ha)	0.49 ha
Existing use(s)	Part boat hire base, garages, open space, derelict workshops, boat repair yard. The site has been derelict since 2006.

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Multiple land ownership. Confirmed intention from one landowner for part of the site.
Does the landowner specify types of development	Planning application 20/01276/FUL (18 units) indicates intent to develop. Planning application was refused in 2022 and the applicants lodged an appeal which was determined in 2023. The appeal was allowed however the appeal for Listed Building Consent was dismissed on the basis that the proposed works were covered by Ecclesiastical Exemption and therefore Listed Building Consent was not required

Stage 1b conclusion
Consider further as an allocation for a mixed-use development including residential and boatyard. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments

What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b <i>(Patches of surface water flood risk towards centre/ north east of site.)</i>
Flooding of land surrounding site for access/ egress	-	The initial parts of the access route are within Flood Zone 2, with the hazard rating generally low at the start of the route. Access/ egress from the site is over land at moderate to low risk/ hazard.

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?

Criteria	SA rating	Comments
Previously developed land?	+	The site would make use of previously developed land although the existing buildings would need to be cleared from the site.
Green belt?	0	The site will not be 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?

Criteria	SA rating	Comments
Housing provision	I	Site allocated for a number of uses including residential development however precise amount of units delivered will depend on implementation.
Affordable housing provision	I	Precise amount of affordable housing to be delivered on site will depend on implementation, including possible off site contribution.

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.*

Criteria	SA rating	Comments
Regeneration area (within	0	Site not within regeneration area.

the top 20% most deprived areas IMD)		

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*.

Criteria	SA rating	Comments
Community facilities	+	Development likely to increase the amount of community facilities on site as one of the allocated uses is a replacement community centre.

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?

Criteria	SA rating	Comments
Public open space	+	Site allocated for mixed use including a public open space.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	>400m to the nearest bus stop (10-minute walk) (850m). The bus routes to this site which go into Oxford city centre only travel via and stop along Woodstock Road. Services on this road are frequent.
Sustainable transport links (rail station)	+	Site is within a 1km walk of Oxford train station.
Primary Schools	+	The nearest primary school is within a 5-minute walk of the site (350m).
Secondary Schools	-	Site is just over 1km away from the nearest secondary school.
GP Surgeries	+	Site is within 500m of GP surgery.
Post office	+	Site is within 500m of a post office.

Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	-	Site is adjacent to Oxford Canal.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Site is near to Oxford Meadows SAC and may require mitigation including notice boards and signage for example. Site is adjacent to Oxford Canal which is an Oxford City Wildlife Site. The site supports a small number of common bat roosts but is otherwise of limited ecological value. Key to any development is avoiding potential impacts on the Canal and the wildlife that utilise it, including foraging and commuting bats, otter and (potentially) water vole. Any planning application should incorporate a robust lighting assessment that demonstrates no additional artificial lightspill on the Canal – from either exterior or interior lighting – or otherwise demonstrate that the lightspill will avoid any significant impacts on the faunal interest. Site contains significant existing trees including a false acacia and silver birch in the public open space north of the church and an ash tree in the church grounds next to Cardigan Street. There also is a row of important trees adjacent to the site along the western side of the Canal Towpath. These trees are collectively important to public amenity in the area and will provide valuable ecosystem services. All these trees are protected by location within the Jerichio Conservation Area. Existing trees will influence developable area of site and its capacity. If existing trees are removed new trees should be planted to fully mitigate the impact tree canopy cover green infrastructure in the area. Opportunities exist to plant new trees to improve connectivity within GI network.

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?

Criteria	SA rating	Comments
Archaeology	0	Site contains no known archeological sites or has limited or uncertain archaeological potential.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Site is entirely within the Jericho Conservation Area.
Listed Buildings	--	Site is adjacent to a Grade I Listed Building (Church of St Barnabas).
View Cones	0	Site lies outside of a View Cone.
Historic Core Area	-	Site lies within the 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Site has been designated for mixed-use development with residential. Any new boatyard will have employees and new leisure moorings will support tourism.
Diversifying the economy and employment opportunities	0	Site has been designated for mixed-use development with residential.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Vehicle access to the site already exists but is likely to need improvements.
Can walking and cycling connections with the surrounding area be achieved?	The site is within the urban area with existing cycle and pedestrian connections but is likely to need improvements.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site is adjacent to the Oxford canal and includes a docking basin. Site contains significant existing trees including a false acacia and silver birch in the public open space north of the church. There also is a row of important trees adjacent to the site along the western side of the Canal Towpath. These trees are collectively important to public amenity in the area and will provide valuable ecosystem services. All these trees are protected by location within the Jerichio Conservation Area. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area.
Are land contamination issues likely?	Historical dockyard area. Potential for contamination.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to Oxford Canal on one side. Site adjoins residential therefore will need to consider sensitive design.

Stage 2 conclusion
The site scores well against a number of the sustainability criteria. Flood risk is an issue which will need to be addressed and the site is in a sensitive location with regard to the historic environment, in particular the conservation area and the Grade I Listed St Barnabus Church. There are potential biodiversity sensitivities which will also need to be considered, particularly with how the site interfaces with the canal. However none of the constraints are insurmountable and so the site is to be put forward for allocation in Regulation 19 Local Plan.

SPCW4: Faculty of Music

Site name	Faculty of Music
SHLAA reference (and OLP2036 Policy if applicable)	021 OLP2036 SP36
Ward	Holywell
Total site size (ha)	0.33
Existing use(s)	Academic use

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes – the planning application submitted in July 2025 indicates there is landowner intention to develop.
Does the landowner specify types of development	The submitted planning application is for a change of use to create a graduate centre including student accommodation (25/01872/FUL). Currently undetermined.

Stage 1b conclusion
Developer has confirmed intent to develop. Consider further for allocation for residential, continue to next stage.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 2 – a small area on the eastern edge.

		Patches of surface water flood risk on the eastern, southern and western boundaries, with a narrow corridor of surface water flood risk extending into site from the west.
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land (with buildings in use on site) and in academic use
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for ongoing academic uses, residential development and/or student accommodation. Minimum number of dwellings to be delivered is 23 (or if delivered as student rooms, the equivalent number of student rooms where the relevant ratio is applied).
Affordable housing provision	/	Depends on implementation (no affordable housing to be delivered under the current but undetermined planning application).

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.*

Criteria	SA rating	Comments

Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 50% of neighbourhoods in England – IMD 2025)

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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities.

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?

Criteria	SA rating	Comments
Public open space	0	The amount of public open space is likely to remain the same due to the allocation.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	City centre location with multiple bus stops and routes on St Aldate's and Speedwell Street. The nearest bus stop (Police Station on St Aldate's) is less than 100m from the site.
Sustainable transport links (rail station)	0	Between 1200 and 1600m from the nearest rail station (Oxford)
Primary Schools	-	More than 800m from the nearest primary school (St Ebbe's C of E Primary School is 850m away)
Secondary Schools	-	More than 800m from the nearest secondary school (Cheney School is more than 3000m away).

GP Surgeries	+	Less than 800m from the nearest GP surgery (Northgate Health Centre is 600m away).
Post office	+	Less than 800m from the nearest post office (Oxford Post Office is 350m away).
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	-	Site is within 30m of a water body (Trill Mill stream lies adjacent to the eastern boundary of the site).

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Adjacent to GI network (Wildlife Corridor at Christchurch Meadow), so potential for improving wildlife linkages

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?

Criteria	SA rating	Comments
Archaeology	-	Located within the City Centre Archaeological Area. The site has potential for Middle-Late Saxon Archaeology (adjacent to possible causeway), also location of a short-lived medieval friary and has medieval and post-medieval potential. Potential for waterlogging and well preserved eco and artefacts.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Entire site within Central (University & City) Conservation Area. Sensitive location - Christ Church Meadow; a Grade I Registered Park and Garden located in very close proximity to the site.
Listed Buildings	-	There are several Grade I and Grade II listed buildings, particularly towards the north of the site on St Aldate's. The Grade II listed

		Christ Church Footbridge and flanking walls in the Memorial Garden and Screen all lie immediately adjacent to the north of the site.
View Cones	0	Site lies outside of a view cone
Historic Core Area	-	Site lies within 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, but site is located off St Aldate's in city centre, so is unlikely to be suitable for uses that require parking or generate much traffic. Therefore, continued academic use and/or student accommodation is most suitable.
Can walking and cycling connections with the surrounding area be achieved?	Very good walking and cycling connections already exist.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Some mature trees are located towards the western boundary of the site. Some of these existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	None identified
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Sensitive location in terms of conservation area, listed buildings, and archaeology.

Stage 2 conclusion

Significant historic environment constraints will need to be addressed and mitigated in terms of conservation area, listed buildings, and archaeology. Development will also likely need to be low car or car free in this city centre location.

Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW5: Jowett Walk (South)

Site name	Jowett Walk (South)
SHLAA reference (and OLP2036 Policy if applicable)	664
Ward	Holywell
Total site size (ha)	0.21
Existing use(s)	Site currently a house, gardens and car park.

Site location plan



Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	Yes	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion

No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Available for student accommodation

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 (No surface water flood risk present on site)
Flooding of land surrounding site for access/ egress	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land (with buildings in use on site)
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Site would provide more than 10 new homes
Affordable housing provision	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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to 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.

Criteria	SA rating	Comments
Community facilities	0	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation

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?

Criteria	SA rating	Comments
Public open space	0	Site not allocated OR amount of public open space remains the same due to the allocation

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	> 400m from a bus stop
Sustainable transport links (rail station)	-	> 1600m from train station
Primary Schools	-	>800m from the nearest primary school with spaces
Secondary Schools	-	>800m from the nearest secondary school with spaces
GP Surgeries	-	>800m from the nearest GP Surgery
Post office	-	>800m from the nearest post office
Air Quality	-	Site is within an Air Quality Management Area (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?

Criteria	SA rating	Comments
Water	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?

Criteria	SA rating	Comments

Ecology and Biodiversity	+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity

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?

Criteria	SA rating	Comments
Archaeology	-	Site within the central archaeological area
Conservation Areas & Register of Parks and Gardens (RPG)	--	Site lies in a conservation area (Central Area)
Listed Buildings	0	Site contains no identified historic building constraint
View Cones	0	Site lies outside of a view cone
Historic Core Area	-	Site lies within the 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	No change in number of jobs/economic floorspace in knowledge-based economy
Diversifying the economy and employment opportunities	0	No change in employment base or access to affordable workspaces

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, via Jowett Walk and Mansfield Rd.
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Unlikely, but any re-development of this site would require a site investigation and contamination risk assessment.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion

No insurmountable constraints. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW6: Manor Place

Site name	Manor Place
SHLAA reference (and OLP2036 Policy if applicable)	031 (SP45)
Ward	Holywell
Total site size (ha)	1.24Ha
Existing use(s)	Former tennis court, allotments, orchards

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	Although in close proximity to New Marston Meadows SSSI
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Landowner has an intention to develop.
Does the landowner specify types of development	Potential for student accommodation or car free residential development.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	Site is partially in Flood Zone 3a <i>(Patches of surface water flood risk to the east of the site, noticeably towards the south eastern corner).</i>
Flooding of land surrounding	0	The access road to the site is within Flood Zone 1, therefore safe access/ egress from the site can be achieved.

site for access/egress		

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?

Criteria	SA rating	Comments
Previously developed land?	-	Unprotected open space
Green belt?	0	Site not in Green Belt

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?

Criteria	SA rating	Comments
Housing provision	++	Site allocated for a minimum of 43 dwellings, which could be delivered as student accommodation
Affordable housing provision	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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not 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.

Criteria	SA rating	Comments
Community facilities	0	Amount of community facilities unlikely to change as a result of allocation.

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?

Criteria	SA rating	Comments
Public open space	0	Amount of public open space would not change as a result of allocation.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<400m from a bus stop.
Sustainable transport links (rail station)	-	>1600m from Oxford Train Station.
Primary Schools	-	>800m from nearest primary school with spaces (St Michael's CE Primary School).
Secondary Schools	-	>800m from nearest secondary school with spaces (Cheney School).
GP Surgeries	-	>800m from the nearest GP surgery (KES Northgate).
Post office	-	>800m from nearest post office (St Aldate's)
Air Quality	-	Site is located within an Air Quality Management Area.

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?

Criteria	SA rating	Comments

Water	-	Site is bordered by the River Cherwell.

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	-	Contains no nature conservation designations. Aerial imagery indicates the site contains grassland, scrub, woodland, and scattered trees. Patches of the woodland are included on the Priority Habitat Inventory. The site baseline is likely to have a high biodiversity value, making it difficult to achieve a net gain alongside development. Potential protected species constraints include foraging and commuting bats, roosting bats (trees), reptiles, badgers, nesting birds. Any development should seek to link in with the surrounding woodland and meadows and provide high-quality semi-natural habitat. The site contains Section 41 (Priority/ Principal) habitats that fall within the LPA Biodiversity Duty. Deciduous Woodland. Extent needs to be confirmed from TVERC database. If existing trees are removed new trees should be planted to fully mitigate the impact on tree canopy cover green infrastructure in the area. New tree planting should be appropriate to ensure that the predicted tree canopy cover (% site area) following development (25 years) delivers policy and GI TAN expectations i.e. at least no net loss. Opportunities exist to plant new trees to improve connectivity within GI network. Site contains significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees are protected by location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity. Strip running through middle of site within LNRS, and also along eastern boundary.

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?

Criteria	SA rating	Comments
Archaeology	-	Within city centre archaeological area. The site is of archaeological interest with Civil War defences having been excavated previously. The site contains the line of Royalist defences that should be preserved in situ.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Within conservation area
Listed Buildings	-	A number of Listed Buildings surround the site including Magdalen College Wall (Grade II*) and on the other side of the river St. Catherine's College Music Room (Grade I) and a number of other Grade I listed buildings associated with St. Catherine's College.
View Cones	-	Within view cone
Historic Core Area	-	Within high buildings 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	0	Development of the site is unlikely to increase jobs associated with the knowledge economy.
Diversifying the economy and employment opportunities	0	No Change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes.

Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Trees exist on the site, change in levels and the River Cherwell borders the site. Site contains significant existing trees which are important to public amenity in the area and will provide valuable ecosystem services. Existing trees are protected by location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	No known contamination issues.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site adjacent to a cemetery.

Stage 2 conclusion
Site has a number of heritage constraints which will require sensitive design in order to overcome. The site lies in a view cone and within the locally designated high buildings area and the height of any buildings should be restricted. However, no insurmountable constraints to development. Site to be put forward for allocation in Regulation 19 Local Plan for student accommodation or residential development.

SPCW7: Nuffield Sites (Island site)

Site name	Nuffield sites – Island site
SHLAA reference (and OLP2036 Policy if applicable)	070 SP1 – West End Sites
Ward	Osney & St Thomas
Total site size (ha)	0.65ha
Existing use(s)	Mix of uses including hotel, retail, office and other town centre uses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes, mix of uses including commercial and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Site is partially in Flood Zone 3b (Patches of surface water flood risk towards western and northern part of site).

Flooding of land surrounding site for access/egress	-	Access/egress from the site (from both Hythe Bridge Street and Park End Street) lies within Flood Zone 2, with a small part within Flood Zone 3.

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?

Criteria	SA rating	Comments
Previously developed land?	0	Site is previously developed land with buildings in use on site
Green belt?	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?

Criteria	SA rating	Comments
Housing provision	++	Likely to deliver more than ten dwellings
Affordable housing provision	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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Amount of community facilities likely to remain the same</i>

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?

Criteria	SA rating	Comments
Public open space	1	<i>Given location, potential to deliver an element of civic space</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Several Bus stops within 400m of site (within immediate vicinity of site) Park End Street (Bus stop D1) serves numerous routes within the city (1, 5, 14) and also further afield (S1, S3 gold)</i>
Sustainable transport links (rail station)	++	<i>Site within 800m from Oxford Railway station</i>
Primary Schools	-	<i>Nearest primary school (West Oxford) is just over 800m away (850m from centre of site)</i>
Secondary Schools	-	<i>Nearest secondary schools more than 800m away. Activate Learning is 500m away but this is a further education college.</i>
GP Surgeries	+	<i>KES Northgate (Northgate Health Centre) is 500m away</i>
Post office	+	<i>Oxford Post Office (St. Aldate's) is 700m away</i>
Air Quality	-	<i>Whole city is within an Air Quality Management Area</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Site within 30m of a water body (Wareham Stream)</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	<i>Site within 100m of Middle Fisher Row Gardens – locally protected space.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site within city centre archaeological area</i>
Conservation Areas & Register of Parks and Gardens (RPG)	-	<i>Site adjacent to boundary of Central (City and University) Conservation Area</i>
Listed Buildings	-	<i>Part of site potentially forms part of setting of a listed building (Cooper's Marmalade Factory or The Jam Factory, 27 Park End Street is nearest Listed Building)</i>
View Cones	0	<i>Not within view cone as within historic core area</i>
Historic Core Area	-	<i>Site lies within the historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	<i>Site has potential to increase jobs/ floorspace relating to the knowledge economy</i>
Diversifying the economy and employment opportunities	+	<i>Potential to deliver affordable workspace at this site</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Wareham Stream runs adjacent to western site boundary
Are land contamination issues likely?	Contamination risks likely to be present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No

Stage 2 conclusion
No insurmountable development considerations at this stage. There are various heritage considerations including views and archaeology. Part of the site is also in an area of flood risk, so will require further site-specific analysis at the planning application stage. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including Worcester St Car Park and Land South of Frideswide Square) for a mix of uses commercial and residential (including student accommodation) and other appropriate complementary town centre uses.

SPCW7: Nuffield Sites (Worcester Street Car Park)

Site name	Nuffield sites - Worcester Street Car Park

SHLAA reference (and OLP2036 Policy if applicable)	081 (SP1 – West End Sites and AOC1 – West End and Osney Mead)
Ward	Carfax & Jericho
Total site size (ha)	0.51ha
Existing use(s)	Surface Level Car Park

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes, mix of uses including commercial and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	<i>Site is partially in Flood Zone 3a (narrow strip along the western boundary, adjacent to Castle Mill Stream)</i> <i>(Patches of surface water flood risk from south west to north east across the site and towards the southern corner).</i>
Flooding of land surrounding site for access/ egress	0/-	Safe access/egress exists from the site to the east, where the route lies entirely within Flood Zone 1. However, access to the west (via Botley Road) includes land within Flood Zone 2.

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Majority of the site is a surface level car park. Site boundary also includes a pub (The Lighthouse)</i>
Green belt?	0	<i>Site not in the green belt</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Site has potential to deliver more than 10 residential units</i>
Affordable housing provision	I	<i>Depends on implementation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)</i>

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.

Criteria	SA rating	Comments

Community facilities	0	<i>Amount of community facilities likely to remain the same</i>

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?

Criteria	SA rating	Comments
Public open space	I	<i>Site has potential to improve public realm both on site and in immediate vicinity but ultimately how much is delivered will depend on implementation</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Numerous within 400m offering a range of frequent service bus services to and from destinations in the city and further afield (e.g., Bus Stop D2, Park End Street)</i>
Sustainable transport links (rail station)	++	<i>Oxford Railway station is less than 800m away</i>
Primary Schools	-	<i>Several primary schools are more than 800m away (1km approx. – West Oxford Primary and St Barnabus, Jericho)</i>
Secondary Schools	-	<i>Nearest secondary schools more than 800m away. Activate Learning is 500m away but this is a further education college.</i>
GP Surgeries	+	<i>Several GP Surgeries within 800m (19 Beaumont Street and Northgate Medical Centre)</i>
Post office	+	<i>Main Post Office (St Aldate's) is less than 800m away</i>
Air Quality	-	<i>Entire city is within AQMA</i>

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?

Criteria	SA rating	Comments

Water	-	<i>Western site boundary is within 30m of Castle Mill Stream</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	0	<i>No nature conservation designations on site. Site within 100m of Middle Fisher Row - locally protected space.</i> <i>The site contains several mature trees on the western boundary. Given the location of these trees within the Central (City and University) conservation area, these trees are likely protected.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site located within the City Centre Archaeological Area. Potential for late Saxon/ Norman remains. Site has potential to form part of the setting of Oxford Castle Scheduled Ancient Monument</i>
Conservation Areas & Register of Parks and Gardens (RPG)	--	<i>Entire site located within the Central (University and City) Conservation Area</i>
Listed Buildings	-	<i>Site has potential to form part of the setting of nearby Listed Buildings (e.g., Grade II Listed Nuffield College)</i>
View Cones	0	<i>Not within view cone as within historic core area</i>
Historic Core Area	-	<i>Site is wholly located within the historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	<i>Site has potential to increase number of jobs associated with the knowledge economy</i>
Diversifying the economy and employment opportunities	+	<i>Site has potential to support diversification of employment base/ provide affordable workspace</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site is regular shaped and flat. Trees on western boundary and adjacent to Castle Mill Stream (also on western boundary)
Are land contamination issues likely?	Contamination risks likely to be present. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	This site is very close to Castle Mound Scheduled Ancient Monument. Unlikely to cause noise or smells but potential visual impact will need consideration.

Stage 2 conclusion
This site does not contain any insurmountable constraints, with only a narrow strip falling within flood zone 3b. There are however a range of heritage constraints including its location within the Central (City and University) Conservation Area, views, and the fact that the site lies within the the setting of various listed buildings and the Castle Motte. These will need to be given due consideration. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including the Island Site and Land South of Frideswide Square) for a mix of uses commercial and residential and other appropriate complementary town centre uses.

SPCW7: Nuffield Sites (Land south of Frideswide Square)

Site name	Nuffield Sites - Land south of Frideswide Square
SHLAA reference (and OLP2036 Policy if applicable)	624 (and within AOC1)
Ward	Carfax & Jericho
Total site size (ha)	0.26
Existing use(s)	Range of residential and ground floor retail

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the	No	

planning process (development commenced)?		

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes.
Does the landowner specify types of development	Landowner intention to facilitate a general improvement to the area, including this site. Landowner proposing a mix of uses including commercial and residential (including student accommodation) across several sites within ownership (including this site).

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	Site is wholly in Flood Zone 2 <i>(Surface water flood risk present across majority of site)</i>
Flooding of land surrounding	-	Land immediately surrounding the area along Becket Street and Park End Street lies within Flood Zone 2, and further west along Botley Road within Flood Zone 3.

site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Previously developed land with buildings in use on site
Green belt?	0	Site not in Green Belt

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?

Criteria	SA rating	Comments
Housing provision	++	Site has potential to deliver more than ten units
Affordable housing provision	I	Potential to deliver housing or student accommodation at this site given its city centre location. Amount of affordable housing would depend 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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Outside regeneration area. Site within one of the 20% least deprived areas in the country. (IMD, 2025)

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.

Criteria	SA rating	Comments
Community facilities	0	<i>Amount of community facilities likely to remain the same</i>

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?

Criteria	SA rating	Comments
Public open space	0	<i>Unlikely to change as a result of allocation</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	<i>Site within 400m of bus stops on Frideswide Square</i>
Sustainable transport links (rail station)	++	<i>Site within 800m of Oxford Railway Station</i>
Primary Schools	+	<i>Less than 800m from nearest primary school (West Oxford Community Primary School)</i>
Secondary Schools	-	<i>More than 800m from nearest secondary school</i>
GP Surgeries	+	<i>Less than 800m from nearest GP surgery (19 Beaumont Street Surgery)</i>
Post office	-	<i>Post Office (St. Aldate's) is over 800m away</i>
Air Quality	-	<i>The entire city is within an AQMA.</i>

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?

Criteria	SA rating	Comments
Water	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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Site contains no nature conservation designations but has potential for nature conservation interest.

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?

Criteria	SA rating	Comments
Archaeology	-	Site within local area of archaeological importance
Conservation Areas & Register of Parks and Gardens (RPG)	--	Site within Central (City and University) Conservation Area
Listed Buildings	-	Site adjacent to several listed buildings including Grade II Listed Coopers Marmalade Factory (adjacent) and the Grade II Listed St Thomas Vicarage is behind the site and the Grade II Listed Church of St Thomas the Martyr is in close proximity to it.
View Cones	0	Not within view cone as within historic core area
Historic Core Area	-	Site lies within the city's 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?

Criteria	SA rating	Comments

Employment Opportunities in the knowledge-based economy	I	This site has the potential to increase the number of jobs in the knowledge economy but how these are delivered will depend on implementation.
Diversifying the economy and employment opportunities	I	Site has potential to support diversification of the employment base or provide affordable workspaces but how these are delivered will depend on implementation.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes.
Can walking and cycling connections with the surrounding area be achieved?	Yes. Existing connections.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No. brownfield city centre site. contains buildings.
Are land contamination issues likely?	Unlikely.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	No.

Stage 2 conclusion
The site lies within the historic core area, within a view cone, within the city archaeological area and within the Central (University and City) conservation area. Given heritage considerations, sensitive design is likely to be required. Site is well served by a range of public transport opportunities. Site is also within a flood risk zone, including access, and this will need to be considered further along with any relevant mitigation requirements where necessary. Site to be put forward for allocation in Regulation 19 Local Plan as part of a wider mixed-use allocation (including Worcester St Car Park and the Island Site) for a mix of uses commercial and residential and other appropriate complementary town centre uses.

SPCW8: Osney Mead

Site name	Osney Mead
SHLAA reference (and OLP2036 Policy if applicable)	586 (SP2 Osney Mead and AOC1 West End and Osney Mead)
Ward	Osney & St Thomas
Total site size (ha)	17.8
Existing use(s)	Mix of employment uses including industrial, warehousing and academic activities

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage of assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes
Does the landowner specify types of development	Yes – an innovation quarter containing a mix of uses including commercial, education and residential (including student accommodation)

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	Flood Zone 3b to the west and middle of the site, larger area of Flood Zone 3a extends across most of northern boundary, nearly all of the site in Flood Zone 2. Areas of surface water flooding scattered across the site.

Flooding of land surrounding site for access/ egress	--	Main access through Flood Zone 3b.

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site contains previously developed land including buildings (both in use and vacant) and areas of hard-standing</i>
Green belt?	0	<i>Site is not within the Green Belt</i>

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?

Criteria	SA rating	Comments
Housing provision	1	<i>Site has potential for homes/ student accommodation.</i>
Affordable housing provision	1	<i>Depends on implementation</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Site not within a regeneration area. (Site within one of 20% least deprived areas according to (IMD 2025)</i>

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.

Criteria	SA rating	Comments
Community facilities	+	<i>Site has ability to deliver community facilities as part of redevelopment</i>

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?

Criteria	SA rating	Comments
Public open space	+	<i>Site has potential to deliver public open space/ make improvements to public realm through redevelopment opportunities.</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	<i>Site is more than 400m from nearest Bus stops on Botley Road (circa 800m from "Osney Island" bus Stop on Botley Road</i>
Sustainable transport links (rail station)	+	<i>Site is 1km from Oxford Station on foot</i>
Primary Schools	+	<i>Nearest Primary School (West Oxford Primary) is less than 400m from the site</i>
Secondary Schools	-	<i>Nearest secondary school is more than 800m away</i>
GP Surgeries	-	<i>Nearest GP Surgery (19 Beaumont Street) is more than 800m away</i>
Post office	-	<i>Nearest Post Office (Oxford St Aldate's) is more than 800m away</i>
Air Quality	-	<i>Site is within an Air Quality Management Area but not within air quality "hotspot"</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Site is bounded by Bullstake Stream (to the south) and the River Thames (to the north)</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Site not within a designated nature conservation area. Potential to improve relationship with adjacent habitats including the Bullstake Stream, River Thames and surrounding fields by ensuring development close to/ near the boundaries preserves/ restores/ re-naturalises bankside habitats and provides buffers. The trees on the northern bank are situated within the Osney Town conservation area and as such are afforded protection by virtue of their location within the conservation area.</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site lies outside the city centre archaeological however there may be archaeological potential at the site</i>
Conservation Areas & Register of Parks and Gardens (RPG)	-	<i>North western boundary of the site is immediately adjacent to the boundary of the Osney Town conservation area. Trees situated along the riverbank are within the conservation area boundary. Potential for northern part of site to be within the setting of the conservation area.</i>
Listed Buildings	-	<i>Site contains no listed buildings however Listed buildings nearby include Osney Abbey (Grade II), Osney Cottage (Grade II) and a Grade II Listed memorial 300 yards south of Osney Lock (Grade II)</i>
View Cones	-	<i>Part site lies within the Raleigh Park View Cone</i>
Historic Core Area	-	<i>Eastern half of the site falls within the Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	<i>The Landowner's ambition is to create an innovation area which would be likely to support an increase in jobs and floorspace in knowledge-based sectors</i>
Diversifying the economy and employment opportunities	/	<i>Currently the site provides a diverse employment base which could be impacted through the comprehensive delivery of a knowledge-based innovation area. However, the creation of such an innovation area could also bring about opportunities to deliver flexible and/or affordable workspaces.</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes, Oxpens Bridge will enhance connectivity with the city centre enabling improved cycling and walking connections with the west end of the city centre.
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No significant changes in ground level however the River Thames and Bullstake Stream provide the northern and southern boundaries (respectively) to the site. Site contains a number of mature trees. Trees on the northern site boundary are within the Osney Town Conservation area and so benefit from protection.
Are land contamination issues likely?	Unknown, however, given the site's history as an industrial estate and considering the variety of previous industrial-related uses, contamination issues are possible.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site located close to fields, is bounded by the river and some residential development nearby on Ferry Hinksey Road. Site adjacent to a substation and contains several pylons which may impact on future development aspirations.

Stage 2 conclusion

While not insurmountable, flood risk issues are potentially significant and will require mitigation. Redevelopment of the site should be undertaken sensitively so as not to detract from views into and out of the historic city core. Development of an Innovation area has the potential to impact existing local businesses who may be displaced.

Allocate site for a mixed-use innovation area including commercial, educational and residential uses (including student accommodation), acceptability of residential uses is subject to conclusions of further flood risk assessment. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW9: Oxford Railway Station and Becket Street Car Park

Site name	Oxford Railway Station and Becket Street Car Park
SHLAA reference (and OLP2036 Policy if applicable)	075 (a+b) (SP1 West End Sites and AOC1 West End and Osney Mead)
Ward	Osney and St Thomas
Total site size (ha)	2.56ha (in SHLAA)
Existing use(s)	Railway station and associated ancillary uses/ surface level car parking

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion

The East West Rail Safeguarding Direction (19 November 2025) Maps suggests that the entire of the proposed site allocation lies within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted.

There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of the site's inclusion within this land. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. Network Rail is working to redevelop the site to support necessary upgrades to Oxford Railway Station to enable delivery of wider transport objectives (e.g., East West Rail and Cowley Branch Line)
Does the landowner specify types of development	Mixed use – residential and economic

Stage 1b conclusion

Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	-	<i>Site is partially in Flood Zone 2 (Patches of surface water flood risk present within site, with the largest patches around the station building in the northern parcel and inside part of the eastern perimeter of the southern parcel along Becket Street.)</i>
Flooding of land surrounding site for access/ egress	-	<i>The initial parts of the current access route are within Flood Zone 2 (Botley Road and Becket Street) and then Flood Zone 3 if heading further west onto Botley Road.</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Site is previously developed land in use</i>
Green belt?	0	<i>Site is not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Likely to deliver more than ten dwellings</i>
Affordable housing provision	I	<i>Given city centre location, a range of residential typologies are acceptable. As such, the precise amount of affordable housing would depend on implementation</i>

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.

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site not within a regeneration area Oxford Station is within one of the 20% least deprived areas. Becket St Car Park is within one of the 50% least deprived areas (IMD,2025)

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.

Criteria	SA rating	Comments
Community facilities	0	Provision of community facilities unlikely to change.

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?

Criteria	SA rating	Comments
Public open space	I	Given location, potential to deliver an element of civic space/ public realm.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Site contains bus stops with many frequent services to a range of locations
Sustainable transport	++	Site contains Oxford Railway Station

links (rail station)		
Primary Schools	+	West Oxford Primary School is 750m away
Secondary Schools	-	The nearest secondary education provider is more than 800m away. Activate Learning is 650m away but this is a further education college.
GP Surgeries	+	Beaumont Street Surgery is 700m away
Post office	-	Post Office (St. Aldate's) is over 800m away
Air Quality	-	Within City-wide 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?

Criteria	SA rating	Comments
Water	0	Northern boundary of site is just over 60m from Castle Mill Stream/ Sheepwash Channel

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Contains no nature conservation designations with limited potential for nature conservation interest. Redevelopment has the potential to improve wildlife linkages

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?

Criteria	SA rating	Comments
Archaeology	-	Station site in close proximity to two Scheduled Ancient monuments (Rewley Abbey and Swing Bridge, LNWR Station). Whole site lies within the city centre archaeological area. Site is therefore of potential archaeological interest.
Conservation Areas & Register of	-	Becket Street car park is adjacent to the Central (University and City) conservation area

Parks and Gardens (RPG)		
Listed Buildings	-	<i>Potential that part the Becket Street car park lies within the setting of the Church of St Thomas the Martyr (Grade II) Listed Building. Several other Listed Buildings including Combe House (Grade II) and St Thomas Vicarage (Grade II) are close by.</i>
View Cones	-	<i>Not within a view cone as whole site within Historic Core Area.</i>
Historic Core Area	0	<i>Whole site lies within the Historic Core Area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	<i>Depending on precise nature of redevelopment, the site has potential to bring forward jobs to support the knowledge economy</i>
Diversifying the economy and employment opportunities	I	<i>Depending on precise nature and scale of redevelopment, site has potential to support diversification of employment base</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes, vehicular access to the site already exists
Can walking and cycling connections with the surrounding area be achieved?	Yes,
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	No
Are land contamination issues likely?	Site contains railway infrastructure which has potential for contamination
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	Site is adjacent to the railway line and part of the site contains the Oxford Railway station. Potential for noise issues, smells and other environmental issues associated with the railway.

Stage 2 conclusion

The site lies within the historic core area, and within the city archaeological area. It is also adjacent to the Central (University and City) conservation area. Given heritage considerations, sensitive design is likely to be required. Site is well served by a range of public transport opportunities. There is some flood risk on the site which may need to be addressed and appropriately mitigated.

Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW10: Oxpens

Site name	Oxpens
SHLAA reference (and OLP2036 Policy if applicable)	076 (Policy SP1 West End Sites and AOC1 West End and Osney Mead)
Ward	Osney and St Thomas
Total site size (ha)	6.3ha
Existing use(s)	Ice Rink, car park, former filling station, open space, sheltered housing and businesses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	Yes	The site partially lies within Flood Zone 3b greenfield

Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion

The East West Rail Safeguarding Direction (19 November 2025) Maps suggests that part of the northern boundary of the site (adjacent to the river and the railway line) is included within the safeguarded area. Where a planning application is submitted on land included within the EWR Safeguarding Direction, the East West Rail Company becomes a statutory consultee and must be consulted in accordance with the instructions in the Direction before planning permission can be granted.

There are no clear conflicts with national policy or insurmountable environmental or physical constraints. However, site allocation policy itself would benefit from acknowledging the EWR Safeguarding Direction (19 November 2025) and highlighting the procedural implications of part of the site's inclusion within this land. Continue to next stage assessment.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes. Resolution to Grant Outline Permission (Planning Committee January 2024)
Does the landowner specify types of development	Yes. Outline permission proposes a mixed use scheme including homes, jobs and a hotel as well as public realm improvements

Stage 1b conclusion

Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	--	<i>Site is partially in Flood Zone 3b (Patches of surface water flood risk present within site, with the largest patches located towards the eastern end)</i>
Flooding of land surrounding site for access/ egress	-	<i>Initial access/egress from the site is within Flood Zone 1, although the route (A420) quickly crosses into Flood Zone 2 to both the east and west.</i>

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?

Criteria	SA rating	Comments
Previously developed land?	0	<i>Part of the proposed site allocation contains publicly accessible open space (however this is outside the redline boundary of the planning application). The site also contains some previously developed land, some of which is surface level car parking and some of which contains a mixture of occupied and unoccupied buildings.</i>
Green Belt?	0	<i>Site is not on Green Belt land</i>

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?

Criteria	SA rating	Comments
Housing provision	++	<i>Resolution to grant planning permission (Jan 2025) for 234 homes and 258 units of student accommodation</i>
Affordable housing provision	++	<i>40% affordable housing achieved on-site in relation to the 234 homes</i>

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	<i>Outside regeneration area. Site within one of the 50% least deprived areas in the country. (IMD, 2025)</i>

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.

Criteria	SA rating	Comments
Community facilities	0	<i>No obvious change in built community facilities</i>

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?

Criteria	SA rating	Comments
Public open space	++	<i>Public open space retained and proposed to be significantly enhanced (likely to result in more than 10% of the site area)</i>

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	-	<i>Closest frequent service bus stops are located on Frideswide Square and Park End Street (more than 400m away). While there is a bus stop opposite the site, it does currently appear to be in use.</i>

Sustainable transport links (rail station)	+	<i>Oxford Railway Station is 600m away</i>
Primary Schools	-	<i>Two primary schools more than 800m away (West Oxford Primary is 1.1km while St. Ebbe's CofE Primary is 900m away)</i>
Secondary Schools	-	<i>The nearest secondary education provider is more than 800m away. Activate Learning is 650m away but this is a further education college.</i>
GP Surgeries	-	<i>Northgate Health Centre is 1km away</i>
Post office	-	<i>St Aldate's Post Office is over 800m away</i>
Air Quality	-	<i>Within City Centre AQMA</i>

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?

Criteria	SA rating	Comments
Water	-	<i>Site is within 30m of River Thames</i>

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	<i>Potential for improvements to wildlife linkages</i>

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?

Criteria	SA rating	Comments
Archaeology	-	<i>Site lies within City Centre Archeological Area</i>
Conservation Areas & Register of Parks and Gardens (RPG)	0	<i>Very small portion of the site is opposite a tight corner boundary of the Central (University and City) conservation area (due to existing buildings). Unlikely to impact setting. Similarly, a portion of the south western boundary of the site is closely aligned to the boundary of the Osney Town conservation area however existing railway infrastructure acts as buffer between them.</i>

Listed Buildings	0	<i>No Listed Building constraint identified</i>
View Cones	0	<i>Not within view cone as within historic core area</i>
Historic Core Area	-	<i>Site lies within the historic core area</i>

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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	+	<i>Site likely to increase jobs/ floorspace associated with knowledge economy as recent resolution to grant outline planning permission includes at least 64,057sqm of employment floorspace</i>
Diversifying the economy and employment opportunities	+	<i>Potential to diversify employment base and/ or provide affordable workspace</i>

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes
Can walking and cycling connections with the surrounding area be achieved?	Yes
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Trees within the site. Site is adjacent to watercourse (River Thames)
Are land contamination issues likely?	Site contains a former petrol filling station so potential for contamination on a small part of the site
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	One of the site boundaries runs alongside the railway line. Potential for environmental issues such as noise and smells.

Stage 2 conclusion
Part of the site is located in Flood Zone 3b which will need to be taken into consideration. The site contains various heritage considerations so careful design will be required. Although in the

city centre ,Oxpens Road/ Thames Street is not on a frequent service bus route however both the Westgate and Oxford Railway Station/ Frideswide Square/ Park End Street provide a good range of frequent service bus stops however these stops are all more than 400m away.

Site should be allocated for a mix of uses including commercial and residential (including student accommodation) and other appropriate complementary town centre uses. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW11: St Thomas School and Osney Warehouse

Site name	St Thomas School and Osney Warehouse
SHLAA reference (and OLP2036 Policy if applicable)	SHLAA ref: #616 LP2036 ref: falls within AOC1 West End and Osney Mead
Ward	Osney & St Thomas
Total site size (ha)	0.41 ha
Existing use(s)	St Thomas: multiple social enterprises/community uses Osney Warehouse: visual arts company including studio, exhibition, education spaces/community uses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	
Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	Yes - Call for sites 2025
Does the landowner specify types of development	Call for sites 2025 landowner confirmed intention to develop for mix of uses including employment and resi/ student accommodation/ specialist elderly. Also, site was identified (but not allocated) in the former West End Area Action Plan for residential use and open space.

Stage 1b conclusion
Landowner has set out intentions for development and potential uses. Continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
What flood zone(s) is the site in?	-	Nearly all of the site is in Flood Zone 2. (Surface water flood risk present in western half of site)
Flooding of land surrounding site for access/ egress	-	Access/egress from the site is over moderate to low hazard land

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Previously developed land?	0	Site is previously developed land with buildings in use on site.
Green belt?	0	Site is not designated as greenbelt.

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?

<i>Criteria</i>	<i>SA rating</i>	<i>Comments</i>
Housing provision	++	Whilst the two sites in combination have the potential to deliver more than 10 new homes, the SHLAA 2025 identifies that it is unlikely to be able to deliver net gain in 10+ units alongside re-provision of community uses.
Affordable housing provision	+	Site would likely provide up to 40% affordable housing.

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	++	Site is not within 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.

Criteria	SA rating	Comments
Community facilities	I/-	Depends upon implementation, development any development would require the reprovision of community based facilities, although this could lead to a loss on site.

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?

Criteria	SA rating	Comments
Public open space	0	Allocation would not lead to loss of public open space, however opportunities to provide additional 10% likely limited due to size constraints of site.

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	350m to Park End Street bus stop D6

Sustainable transport links (rail station)	++	550m to train station
Primary Schools	-	1km to West Oxford Community Primary School
Secondary Schools	-	1.8km Magdalen College Secondary School
GP Surgeries	-	750m to Beaumont Street surgery
Post office	+	Nearest post office is less than 800m away (St Aldates)
Air Quality	-	Within city-wide 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?

Criteria	SA rating	Comments
Water	0	Nothing identified nearby, though Castle Mill stream is to the east (more than 30m)

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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	No international/national or local sites within 200m. Sites separated by line of mature trees. Likely to provide habitat for roosting, foraging and commuting bats and nesting birds. Records of swifts within 100m. Retention of trees onsite to retain ecosystem benefits such as shading, as well as avoid the requirement for mandatory BNG. the development design should look to enhance the tree line with species rich grassland margins and further individual tree delivery across the site. All of the eastern parcel, and most of the western parcel apart from northwest corner are within LNRS.

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?

Criteria	SA rating	Comments
Archaeology	-	Within the City Centre Archaeological area. Close to poorly understood route of western Royalist defences and located south of Osney Lane where there is some potential for medieval settlement before later contraction. Any significant new build likely to require assessment and evaluation.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Western half of the site is within Central (University and City) Conservation Area
Listed Buildings	0	No
View Cones	0	Not within a view cone as within historic core area
Historic Core Area	-	Site is within the 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	Depends on implementation as to whether there would be any gains – No jobs or economic floorspace would be lost in the knowledge-based economy given that the existing uses of the buildings are related to social enterprises and a visual arts studio.
Diversifying the economy and employment opportunities	I	Depends on implementation – Current uses support a diversification of the employment base, therefore depending on implementation, there is potential to lose this if the site is redeveloped.

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Yes – vehicular access is currently off Oxpens Road to the rear, or via St Thomas St/ Woodbine Pl onto Osney Lane. No direct

	access from Holybush Road/Oxpens Road onto Osney Lane.
Can walking and cycling connections with the surrounding area be achieved?	Yes – there are already some connections in place and pedestrian only access routes can be utilised to reach further into the city centre
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Pedestrian access to City of Oxford College separates the two sites. Site is level and no significant physical features are present There are significant existing trees significant existing trees along the west boundary of the eastern site, growing alongside the pedestrian access to City of Oxford College, which are important to public amenity in the area and will provide valuable ecosystem services. However, the viability of the trees long term is doubtful and consideration should be given to their replacement. Existing trees will influence developable area of site and its capacity.
Are land contamination issues likely?	Potential for contamination issues at eastern portion of the site due to the former use of the warehouse (Underhills Hide and Skin Market). Contamination risks may be present due to previous use. Site investigations and remedial works likely to be necessary.
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	SHLAA records that surrounding uses include: housing, employment and education. Not particularly sensitive given that the site in question is in employment use, although acknowledge that little noise/ other nuisance is likely to be generated given the current operation/ nature of use is likely to be fairly quiet with limited vehicular movements.

Stage 2 conclusion

The site is previously developed land and its location is suitable for sustainable development. The site is not sensitive from an ecological perspective, although there are potential heritage sensitivities, as well as addressing loss of community uses (depending upon implementation) which may need to be addressed as part of allocation. Much of the site is also exposed to flood risk and this will need to be appropriately investigated in further detail and mitigated where necessary. Site to be put forward for allocation in Regulation 19 Local Plan.

SPCW12: West Wellington Square

Site name	West Wellington Square
SHLAA reference (and OLP2036 Policy if applicable)	#065 LP2036 policy SP62
Ward	Carfax and Jericho
Total site size (ha)	0.88ha
Existing use(s)	Academic and Institutional uses

Site location plan



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Stage 1a assessment – are there any clear conflicts with national planning policy and/or any insurmountable environmental or physical constraints?

Assessment criteria	Outcome	Comments
Is the site an SAC or SSSI?	No	
Is the site greenfield in flood zone 3b?	No	
Is the site area less than 0.25ha?	No	

Is the site already at an advanced stage in the planning process (development commenced)?	No	

Stage 1a conclusion
No clear conflicts with national policy or insurmountable environmental or physical constraints. Continue to next stage.

Stage 1b assessment – Assessment of deliverability of the site including any known intentions for development.

Is there confirmed landowner intention to develop	2025 – Landowner confirmed intention to develop within plan period.
Does the landowner specify types of development	Current allocation establishes site is suitable for academic institutional, student accommodation and residential development including employer-linked affordable housing. Uses appropriate to LP2036 policy V4 (inc use class E) will also be suitable in local centre.

Stage 1b conclusion
Landowner has confirmed intention to develop – continue to next stage of assessment.

Stage 2 assessment – Further assessment of site deliverability, including consideration of sustainability impacts (using the Sustainability Appraisal framework)

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?

Criteria	SA rating	Comments
What flood zone(s) is the site in?	0	Site is in Flood Zone 1 Small patches of surface water flood risk to the south-west corner of site and also near the eastern boundary
Flooding of land	0	There is safe access/egress from the site – area surrounding site is Flood Zone 1

surrounding site for access/ egress		

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?

Criteria	SA rating	Comments
Previously developed land?	0	Yes.
Green belt?	0	Site is not in the Green Belt.

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?

Criteria	SA rating	Comments
Housing provision	++	
Affordable housing provision	I	Depends on implementation- likely to be student accommodation

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.*

Criteria	SA rating	Comments
Regeneration area (within the top 20% most deprived areas IMD)	0	Site is not in or adjacent to a regeneration area. (Site lies within an area that is less deprived than more than 80% of neighbourhoods in England – IMD 2025).

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.

Criteria	SA rating	Comments
Community facilities	0	

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?

Criteria	SA rating	Comments
Public open space	0	Site adjoins Wellington Square open space. Unlikely to be scope to provide open space directly within the site itself due to size and constrained nature of site

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?

Criteria	SA rating	Comments
Sustainable transport links (bus stop)	+	Nearest bus stop less than 300m (St Giles/Banbury Rd) with frequent services. Site is in fairly close proximity to city centre with range of additional connections.
Sustainable transport links (rail station)	+	1km to Oxford Rail Station
Primary Schools	+	500m to St Barnabus Primary School
Secondary Schools	-	2.3km to Cherwell School
GP Surgeries	+	400m Beaumont Surgery
Post office	+	350m Walton Street Post Office
Air Quality	-	Whole city is 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?

Criteria	SA rating	Comments
Water	0	Site more than 30m from 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?

Criteria	SA rating	Comments
Ecology and Biodiversity	+	Not located on or close to a designated ecological site. Development may offer opportunity to enhance ecology/biodiversity at adjoining Wellington Square green space (GI network). The site is largely developed, with semi-natural habitats limited to garden space (with numerous mature trees). Potential protected species constraints are likely limited to roosting bats and nesting birds.

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?

Criteria	SA rating	Comments
Archaeology	-	There is a high potential for archaeological interest as it is the site of the Wellington Workhouse and a line of Civil War defences.
Conservation Areas & Register of Parks and Gardens (RPG)	--	Entire site within Central (City & University) Conservation Area, to which many of the buildings make a positive contribution.
Listed Buildings	-	Adjacent to listed buildings including 4-15 Walton Street (Grade II)
View Cones	0	Not within a view cone
Historic Core Area	-	Within the 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?

Criteria	SA rating	Comments
Employment Opportunities in the knowledge-based economy	I	Potential for an increase in jobs the support the knowledge economy but precise uses will depend on implementation.
Diversifying the economy and employment opportunities	0	No Change

Other constraints which could affect suitability of site for development

Can access for vehicles be achieved?	Access is limited to a single-width carriageway between two buildings off Walton Street and is not suitable for any material increase in traffic movements.
Can walking and cycling connections with the surrounding area be achieved?	Very well connected for walking and cycling
Does the site include any significant physical features such as trees, rivers/streams or changes in ground level?	Site contains significant existing trees at the rear of properties and on the green space near the corner of Walton Street and Little Clarendon street which are important to public amenity in the area and will provide valuable ecosystem services. Trees are protected by their location within the Central Conservation Area. Existing trees will influence developable area of site and its capacity. Opportunities exist to plant new trees to benefit public amenity in the area and to enhance the character and appearance of the conservation area.
Are land contamination issues likely?	None identified
Does the site adjoin a sensitive land use? Is there an adjoining land use that may cause disturbance or environmental issues such as noise or smells?	None identified

Stage 2 conclusion
The site is previously developed land and is in an accessible location. There are some potential heritage sensitivities regarding the conservation area and archaeology, as well as nearby listed

buildings and location of the site within the historic core of the city. These would need to be addressed through appropriate mitigation requirements where necessary as part of any allocation. Site to be put forward for allocation in Regulation 19 Local Plan.

Background paper 001

Title: Housing Need, Requirement and mix

This paper addresses the overall need for housing in Oxford, how the housing requirement may differ from this, and the mix of unit sizes needed.
Relevant Local Plan 2045 Objectives: • 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.
Relevant SA Objective(s): 4. To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home.
SEA theme(s): Material assets, population and human health.

1. Introduction.....	3
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	4
National Planning Policy Framework (NPPF).....	4
National Planning Practice Guidance (PPG)	4
Regional and Local Context.....	5
Oxfordshire Housing and Growth Deal	5
Neighbouring Local Plans	5
Oxford Growth Commission.....	7
Oxford Local Plan 2036.....	7
Housing and Economic Land Availability Assessment.....	7
Oxford City Council “Our Strategy” 2024-2028	7
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	8
Housing Need	8
Housing Requirement	8
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	8

Housing Supply.....	8
Housing Completions	9
5. Key issues addressed through the Local Plan 2045.....	10
Housing need	10
Housing requirement	10
Unmet housing need.....	11
Housing mix	12
Appendix A- Policy Options and Preferred Approaches	14
Policy options set 001a (draft Policy H1): Housing requirement	14
Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms) ..	18
Mix of housing sizes – Draft policy H6	22
Policy options set 001c (draft policy H8): Loss of dwellings.....	22
Development involving Loss of dwellings – Draft policy H8.....	25

1. Introduction

- 1.1 Oxford has acute housing pressures that need to be addressed. The city has an urgent need for more housing, and it is widely recognised that demand continues to outstrip supply. Oxford is an international city and important part of the knowledge economy, with a world-renowned university and hospitals. In addition, the mix of housing sizes also needs to be considered, as some will need smaller (1-bed) units and others larger homes to accommodate a large family. How to manage particular housing types such as Houses in Multiple Occupation (HMOs) is also important. This paper focuses on overall housing need and mix. The supply of available and affordable housing is a priority in supporting the economy, including healthcare and education needed for the city, because it means that staff can be both attracted and retained more readily. Meeting the needs of those in high housing need, or those who may struggle to afford to remain in the city, is also important to meet social objectives such as overcoming inequalities and improving health and wellbeing. Affordable Housing is considered in Background Paper 002. Particular groups have particular housing needs, including students, those who need extra care, gypsy, traveller and boaters. Specialist housing need is considered in Background Paper 003.

- 1.2 This topic paper begins with a review of the national, regional and local policy context relating to housing need and requirement. It then goes on to look at the current situation in Oxford and includes a discussion on housing need and Oxford's housing target. The "current situation" section then moves on to discuss housing supply. The next section talks about the likely future without a new local plan and discusses housing supply and the competing pressures for limited land available in the city. Finally, some key sustainability and plan issues are identified.
- 1.3 Historically Oxford has been unable to meet its calculated housing need. The last round of Local Plan's in Oxfordshire aimed to meet the needs assessed in the 2014 Oxfordshire Housing Market Assessment, updated for Oxford in 2018. Oxford's total capacity for housing was less than its calculated need. So unmet need was taken by the other districts' local plans (full details are set out within this paper).
- 1.4 The Oxford Strategic Housing Land Availability Assessment (January 2026) shows that the current capacity is 9,267 dwellings for the Local Plan period 2025-2045 (including a 10% buffer to applicable sites). This shows that Oxford's total capacity for housing is still less than its calculated need.
- 1.5 Paragraph 71 of the NPPF states that a range of market and affordable housing types should be available to meet a wide range of needs. Policy H5 contributes towards this by shaping the size of dwellings. The evidence which has informed the % requirements include the Updated Specialist Housing Needs Evidence (2025, Icen) combined with factors from the affordable housing register including mix of unit sizes, need to downsize and the existing housing stock.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

- 2.1 The National Planning Policy Framework ([NPPF](#)) states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 61). At paragraph 62 the NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance. The NPPF also considers that the needs of groups with specific housing requirements are addressed. Paragraph 63 provides an indication of those groups which includes, older persons, students, and gypsies and travellers. Paragraph 69 sets out that a housing figure for the whole local authority area should be included by strategic policy making authorities and Paragraphs 72-77 provide the national policy position on identifying land for homes. Paragraphs 78-81 discuss how strategic policy making authorities should maintain the supply and delivery of new homes.

- 2.2 The National Planning Policy Framework (NPPF) (2024) requires local planning authorities to plan for a mix of homes based on current and future demographic trends, market trends and the needs of different groups in the community. The size, type, tenure and range of homes needs to reflect local needs to ensure that mixed and balanced communities are supported. The housing need across Oxford is high and as such all types and sizes of dwellings are required. However, some sites and the area context will lend itself to certain mixes of dwellings. The city centre and district centres are most likely to be suitable for higher density developments and it is expected that dwelling densities would continue to be higher than those in neighbouring districts reflecting Oxford's urban area.

National Planning Practice Guidance (PPG)

- 2.3 The National Planning Practice Guidance (PPG) includes additional guidance on the following housing topics relevant to housing need and supply:
- [Housing and economic land availability assessment;](#)
 - [Housing and economic needs assessment;](#)
 - [Housing needs of different groups;](#)
 - [Housing needs for older and disabled people;](#)
 - [Housing supply and delivery.](#)
- 2.4 The PPG re-iterates the expectation for strategic policy-making authorities to follow the standard method for calculating housing need (Paragraph: 002 Reference ID: 2a-002-20241212). This explains that the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. This is intended as an unconstrained assessment of the number of homes needed in an area. The PPG is clear that this assessment does not produce the housing requirement figure.
- 2.5 The PPG goes on to explain the housing requirement (040 Reference ID: 2a-040-20241212). The PPG says that, once the need is calculated using the standard method, the planning authority should make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.
- 2.6 The PPG also provides advice about assessing land availability within the boundaries of a plan-making authority including setting out the purpose of this assessment. Paragraph 001 Reference ID: 3-001- 20190722 of the PPG sets out that “An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.” In relation to whether or not a site should be allocated, the PPG sets out that the role of the land availability assessment is to provide information on the range of sites which are available to meet the local authority's requirements but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

Regional and Local Context

Oxfordshire Housing and Growth Deal

- 2.7 The Oxfordshire Housing and Growth Deal supports the delivery of 100,000 homes in Oxfordshire between 2011 and 2031 and secured £215million of funding including £60million for affordable housing and £150million for infrastructure improvements including for road and rail. As part of this deal, there was a commitment to produce a county-wide strategic plan. For this reason, work began on the Oxfordshire Plan 2050, which was to provide high-level strategy to inform the districts' local plan, including on housing need and the housing requirement for each district. However, work on this plan was eventually aborted by the constituent authorities.

Neighbouring Local Plans

- 2.8 In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of housing need identified in the 2014 Strategic Housing Market Assessment (SHMA) due to the constrained nature of Oxford. Oxford's need was assessed as a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). The approach taken by the Oxfordshire Growth Board (now the Future Oxfordshire Partnership) was that the mid-point of this range should be taken as the starting point for assessing the level of need and unmet need (i.e. 28,000). Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. The assumed capacity for Oxford was 10,000 dwellings.
- 2.9 In the last round of Local Plans, the other Oxfordshire districts agreed to deliver 14,300 dwellings, which met the majority of unmet need arising from Oxford's Local Plan 2036. These were apportioned as follows:

Table 2.1

Cherwell Local Plan	4,400
South Oxfordshire	4,950
Vale of White Horse	2,200
West Oxfordshire Local Plan	2,750

- 2.10 Originally, the intention for the next round of local plans was that housing need and requirements would be informed by the Oxfordshire Plan 2050. The Oxfordshire Growth Needs Assessment was undertaken, agreed and published, and initial work on the Oxfordshire Plan 2050 consulted on. This had not yet got to the point of developing a strategy to use to apportion the need between the districts. Further work to update the OGNA was commissioned, but agreement on this work could not be reached, and work on

the Oxfordshire Plan ceased. Work had commenced on the Oxford Local Plan 2040, and to enable this to continue, Oxford, with Cherwell, commissioned a Housing and Economic Needs Assessment to inform the housing need of those two authorities. The Oxford Local Plan 2040 was submitted for examination on this basis, but the Inspectors concluded that the duty to cooperate had not been met because the HENA looked at the whole of Oxfordshire in order to establish the housing need of the two authorities.

- 2.11 Work has continued on local plans in each Oxfordshire district, however in the meantime delivery of homes to meet Oxford's unmet need for has been very slow to come forward. Negotiations and joint working have been on-going to ensure strategic sites deliver for Oxford's unmet need, including for example co-operative working on Development Briefs and by ensuring there are signed agreements on nomination rights for the affordable housing, so it meets the needs of those on Oxford's housing list. More details are provided in Section 5 below.

Oxford Growth Commission

- 2.12 The [Interim Report of the Oxford Growth Commission](#) (2025) highlights that "*local authorities collectively are not planning to meet their minimum housing requirements on a County wide basis*". Failure to meet Oxford's unmet need does not "support the scale of economic growth across the County" which are linked to the government's ambitions for the Oxford-Cambridge Growth corridor, and forecasted population growth.

Oxford Local Plan 2036

- 2.13 The Oxford Local Plan 2036 contains a number of policies relating to housing need and supply. In particular Policy H1 sets the housing requirement for the plan period. The housing requirement for the plan period from 2016-2036 is 10,884 homes, which is a stepped trajectory to reflect the anticipated delivery of housing over the plan period. The housing requirement in the Oxford Local Plan 2036 is as follows:

- 2016/17 to 2020/21: 475 dwellings per annum
- 2021/22 to 2035/36: 567 dwellings per annum

- 2.14 Policy H4 sets the mix of dwelling sizes. This applies only to affordable housing. For market housing, an explanation of the proposed housing mix is required. There are exceptions to the policy requirement for affordable housing, for example in the city and district centres, where density may be high and only smaller units are suitable.

Housing and Economic Land Availability Assessment

- 2.15 This is a constraint-based assessment that seeks to identify sites and broad locations and assesses their development potential. The assessment looks at whether sites and broad locations for development have the potential to come forward as part of the development plan process. (i.e., are sites or broad locations for development available and achievable?) The most recent one carried out for Oxford was to support the Oxford Local Plan 2040 and was completed in September 2023, with an addendum completed in March 2024. This

showed the capacity of Oxford to be 9,851 for the period 2020-2040, which is an average of 493 dwellings per annum. This will be updated to support the Oxford Local Plan 2045.

Oxford City Council “Our Strategy” 2024-2028

- 2.16 One of the five main priorities of the City Council’s strategy to 2024 is to deliver ‘good, affordable homes’. The strategy recognises that ‘To address Oxford’s housing issues we must drive up standards for existing housing alongside a focus on providing new homes, working in partnership across the housing sector.’

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Need

- 3.1 In national planning policy, an area’s housing need is different from the housing requirement. The NPPF December 2024 makes it clear that the assessment of housing need should be generated using the Government’s Standard Method. Oxford’s housing need has been calculated as 1,087 dwellings per year, using the standard method and affordability ratio (Office for National Statistics, March 2025). The housing need figure may be updated after the new affordability figures are released in March 2026.

Housing Requirement

- 3.2 The NPPF recognises that there may be reasons to set a housing requirement that is different to the housing need as calculated by the Standard Method. It also recognises that there may be unmet need, if the housing need is greater than the number of homes that can realistically be delivered within the plan period within the planning authority’s area. This is the case in Oxford as the housing need is significantly greater than the capacity of the city.
- 3.3 There are very significant constraints on the capacity of the city – physically with the city’s tight administrative boundary and Green Belt, and environmentally with large areas of national and international biodiversity interests and areas within flood zone 3b functional flood zone as well as heritage and townscape considerations. Oxford’s housing requirement is therefore a constrained and capacity-based target. The Inspector for the Oxford Local Plan 2036 acknowledged in his report that Oxford’s housing requirement was only a proportion of the total number of homes that made up the total housing need.
- 3.4 Oxford’s physical and environmental constraints on its capacity for growth are not new issues and through the joint working undertaken as part of the Growth Board, an element of Oxford’s unmet need was apportioned to the surrounding Oxfordshire district councils to accommodate within their administrative areas as part of the Duty to Cooperate process. This led to strategic allocations for growth in plans for all of the Oxfordshire district authorities most recent Local Plans.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Housing Supply

- 4.1 Oxford's constrained capacity for housing land has traditionally meant that there is strong competition for land for housing, student accommodation, employment and other uses. In order to help address the supply of housing, the strategy for the Oxford Local Plan 2036 was housing-focused and prioritised delivery of homes. The strategy sought to allocate no new employment sites, instead prioritising the loss of certain low quality, poorly located employment sites (category 3 employment sites) for housing. Notwithstanding this approach, there is continued pressure on infrastructure as a large proportion of housing developments are on small-scale infill sites and offer limited opportunities to deliver new on-site strategic infrastructure. This has been exacerbated by changes to national policy in recent years which include permitted development for residential conversions from other uses including offices and shops. Such changes of use are not subject to the same planning considerations in relation to supporting infrastructure to support the new homes formed.
- 4.2 Work with the other Oxfordshire authorities has resulted in a number of strategic allocations being made in the plans of our neighbours to help meet housing need. Other actions by the City Council to deliver housing, such as setting up a housing company and setting affordable housing delivery as a corporate priority, will continue to push forward housing delivery.

Housing Completions

- 4.3 Since 2006, the majority of new homes have been delivered on small-scale, dispersed brownfield sites, either re-developing existing units or converting existing buildings. The city's last remaining strategic greenfield sites are Barton Park and Oxford North. For the last few years, annual delivery at Barton Park has made a significant contribution to housing delivery, and more recently housing has begun to be delivered at Oxford North.
- 4.4 Table 4.1 shows the net additional completions from 2016/17 (the base date of the 2016 Local Plan) which is taken from the 2023/24 Annual Monitoring Report published in December 2024. This takes into account dwellings gained and lost through new build completions, demolitions, changes of use and conversions and includes completions of purpose built student accommodation.

Table 4.1 - Showing net additional completions since 2016 (Oxford City Council 2025)

Year	Dwellings (net) completed (built)
2016/17	419
2017/18	367
2018/19	358
2019/20	790
2020/21	711
2021/22	581

2022/23	554
2023/24	365
2024/25	272
TOTAL (since 2016/17)	4,417

- 4.5 In the 24/25 monitoring year there were 272 recorded completions which represents a decrease compared to recent years. This follows a decrease in 21/22 and 22/23 compared to 19/20 and 20/21. This is reflective of both the lack of new large strategic sites, and also wider economic circumstances, including uncertainties from Brexit and the global economic situation (affected by Covid, the Ukraine war and other globally significant effects), and the lack recently of large student accommodation schemes. Changed economic circumstances have also tipped the balance towards delivery of economic development, particularly research and development, rather than housing, which has resulted in fewer conversions from economic sites to housing.
- 4.6 Likely trends without the plan include continued residential completions from a variety of sources including from Oxford City Housing Limited.

5. Key issues addressed through the Local Plan 2045

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to housing delivery objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.
- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Housing need

- 5.3 Housing need is an unconstrained assessment of the minimum number of homes needed in an area. The housing need for Oxford is determined by the Government's Standard Method for calculating housing need. The NPPF and PPG is clear that whilst alternative methods may be used to set the Plan's housing requirement, the Standard Method is the appropriate method for calculating housing need.
- 5.4 The December 2024 Standard Method uses a formula that incorporates a baseline of local housing stock, adding 0.8% to this, then adjusting upwards to reflect local affordability pressures, using the latest ONS median house price to workplace earnings ratio. The

method accounts for economic growth indirectly by application of the affordability ratio, as a number of pressures from a successful economy will impact on affordability, leading to an uplift when calculating the housing need. The Standard Method housing need for Oxford is currently 1,087, which is 21,740 over the 20-year plan period.

Housing requirement

- 5.5 Assessing housing need is the first step in deciding how many homes to be planned for. The number of homes to be planned for should be reflected in the housing requirement specified in the Local Plan. Policy H1 sets the housing requirement for the Plan period. The housing requirement may exceed the need if that can be justified based on, for example, economic ambitions. Likewise, a housing requirement can be set that is lower than the calculated need if there are constraints on capacity. In this case, a housing capacity assessment, carried out using the [Housing and economic land availability assessment guidance](#) needs to demonstrate that constraints limit housing capacity. It is also necessary to show that all efforts have been made to identify capacity for housing.
- 5.6 Over the 18 years from 2006/07 to 2023/34 housing delivery in Oxford has averaged 451 dwellings per annum, varying from 200dpa in 2010/11 to 821 in 2006/7. Therefore, from the outset, it has seemed unlikely that enough housing sites could be found to meet the identified housing need.
- 5.7 Every effort has been made to identify housing capacity in the city, as set out in the SHLAA. The SHLAA assesses the housing capacity over the Plan period as 9,267 dwellings (463dpa). Therefore, the housing requirement set out in Policy H1 is for 463 dwellings per annum.

Unmet housing need

- 5.8 Where a housing requirement set in a Plan is lower than the identified housing need, this creates an unmet housing need. The onus is on the planning authority generating this need to approach councils located where this need could be met appropriately, and to attempt to reach agreement for the unmet need to be incorporated into their local plans.
- 5.9 There is a long history in Oxford of working with our neighbours on housing matters, with the most recently adopted suite of Local Plans in Oxfordshire based on a joint assessment of housing need and an apportionment of, and provision for, Oxford's unmet need. As work has progressed on this Local Plan, there have been regular conversations between the Oxfordshire authorities on the likely level of Oxford's unmet need and the commitments of the neighbouring authorities to assist with this. In addition to the regular Oxfordshire Planning Policy Officers and Heads of Planning meetings the City Council took the initiative in Spring 2025 to set up a Duty to Co-operate Forum.
- 5.10 The Duty to Co-operate Forum has met every month since June 2025 to discuss Duty to Co-operate matters arising from our plan production processes and largely focussing on

Oxford’s Plan and housing matters. This group has agreed a process for the conversation on unmet need with streams of work and key milestones identified to facilitate it. This has included: workshops on Oxford’s SHLAA approach and emerging outputs, and the sharing of the full SHLAA report ahead of its publication: a formal request for assistance with unmet need; and confirmation of and collation of commitments of each of the Oxfordshire districts. This conversation is ongoing and has enabled an Interim Joint Statement of Common Ground to be published on the matter as part of the Regulation 19 consultation material, with the intention of publishing a detailed Memorandum of Understanding at the submission of the Oxford Local Plan.

5.11 The Interim Statement of Common Ground provides details on the commitments towards Oxford’s unmet need in the adopted and emerging plans of neighbouring districts (as of January 2026). This confirms that Oxford has calculated the level of unmet need for the period 2025-2045 to be: 12,373 homes; that all the Oxfordshire authorities have in combination made provision for 14,300 homes in their currently adopted Local Plans; and that they plan to continue to provide for Oxford’s unmet need in their emerging Local Plans (the emerging Plans of Cherwell, South Oxfordshire, Vale of White Horse are currently at examination and West Oxfordshire has recently published a Regulation 18 consultation document). This gives the City Council confidence that our identified unmet need can be met.

Housing mix

5.12 The Updated Housing Needs Assessment (2025, Icení) provides an analysis of housing need including mix, size and tenure of homes needed. To consider the mix of homes needed, a model is applied that starts with the current profile of housing in terms of number of bedrooms and the tenure. Data about the age of households and typical sizes of homes they occupy enables demographic projections to be applied to see how much each age group is expected to grow in number and therefore the profile of housing need over the 2025-2045 period. The size of housing that households occupy relates more to their wealth and age than the number of people they contain, so in projecting it is not simply assumed that an increase in single-person households will automatically translate into a need for smaller units. Issues of supply can also impact occupancy patterns. The issue of choice is less relevant in the affordable sector. Table xxx below shows the identified need for different sizes of unit by tenure.

Table 5.1: Modelled mix of housing by size and tenure (assuming capacity-led level of housing growth).

	1-bed	2-bed	3-bed	4-bed
Market	10%	26%	41%	23%
Affordable home ownership	24%	35%	24%	16%
Affordable housing (rented)	30%	34%	30%	5%

Source: Icení Housing Market Model

- 5.13 In setting the mix for the affordable housing element of a scheme, as well as the modelled outputs based on demographics, information about current needs represented by the housing list. The City Council's Housing Services team are able to understand immediate and pressing needs. Following consultation with Housing Services, it was established that the current (and immediate) demand for 2-bed homes is relatively low. On the other hand, there are currently long waits for 1 bedroom properties. This is expected to be a long-term trend, with countywide homelessness transformation moving to a Housing-Led model seeking to move people into supported accommodation and rough sleepers quickly into one bedroom accommodation, so demand will continue and expect this pressure to further build.
- 5.14 It is important that an appropriate mix of dwelling sizes is provided to help meet the needs of the range of household types, with an understanding of immediate needs, but also needs projected over the Plan period. A range of sizes will allow more flexibility over time. Therefore, Policy H5 sets out the appropriate mix of dwelling sizes. A mix is provided for affordable rented forms of dwellings, and separately for affordable rent for those over 65 and also for affordable ownership forms of homes. These mixes are provided in the form of range to allow for other site-specific considerations to inform the exact mix.
- 5.15 There are a number of other factors that influence the appropriate mix on a particular site including the site context and local needs. To enable a fully flexible response to current and site-specific requirements, no mix is set out for market housing, However, Policy H5 does set out that evidence will be required to support the proposed mix on residential sites, which can draw from the Specialist Housing Needs Evidence, market demand, design considerations and housing register.

Appendix A- Policy Options and Preferred Approaches

Policy options set 001a (draft Policy H1): Housing requirement

The Government has introduced a 'Standard Method' to be used to calculate each planning authority's individual housing need. It is important that the overall housing need is fully understood, in order to be able to plan to meet that need. The NPPF is clear that the housing need should be calculated using the Standard Method. The strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

This means that there are not really options for calculating housing need. The housing need for Oxford calculated by the Standard Method introduced in December 2024 is currently 1,087. That means that the housing need over the 20-year plan period 2025-2045 is currently 21,740.

However, there are different potential options for the housing requirement set out in the Local Plan. The housing requirement is what it is expected will be delivered each year. The housing land supply will be calculated using this figure, and it will be used as the target for the Housing Delivery Test. The NPPF sets out that the requirement may be higher than the identified housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment

Table 1 - Policy options set 001a: Housing requirement for the plan period

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).	The NPPF says that local plans should aim to meet identified need. Meeting housing need in full would help reduce social problems such as overcrowding and homelessness, as well as problems employers have attracting staff. It may help improve affordability. Meeting housing need within the city may help communities stay together.	It is simply not physically possible to meet the entire housing need within the city's tightly drawn boundary, potentially at all and certainly without significant detrimental effects on other objectives, including protecting open space and avoiding functional floodplain. Housing completions over the previous decade and more have averaged at around 400dpa, which reflects that most housing in Oxford is delivered on small brownfield sites. In seeking to accommodate this level of need in full there will be pressure to use unsuitable sites or to build at densities that negatively impact character and quality of life. The focus on delivering this level of housing would significantly restrict the ability to bring forward other uses for which there is also a significant need in the city and to protect important green spaces and local character. But even with the pressure of the target and negative impacts, it is still not considered achievable.
Option b Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with	The requirement would be deliverable within the city (this is the only option that achieves this). The principle has been tested at examination and found sound for LP2036, the Core Strategy, and the 2016 Local Plan before that.	It will need to be shown that need is being met elsewhere if provision is not made for the full need. A basis will still be needed for the need calculation, even if it is not meeting the requirement. If a capacity-based approach is taken for housing it will be harder to justify provision for other land uses in any quantity.

the spatial strategy (c.9,800 dwellings over the Plan period 2022-2042).		
Option c Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.	The Standard Method need calculation is based on existing housing stock with an affordability uplift applied. It does not, therefore, necessarily take account of the exceptionally strong economic growth in Oxfordshire, that, if not supported by housing, leads to greater problems of affordability, inaccessibility of housing and increased commuting. The affordable housing need in Oxford is also incredibly high and not necessarily fully accounted for by the affordability uplift. Attempting to meet this need helps overcome social problems exacerbated by insufficient housing.	The HELAA evidence base indicates that this option would be undeliverable in Oxford over the plan period, thus there would be significant unmet need issues and we would need to work with other Oxfordshire districts to make provision to accommodate unmet need in their areas. Continued growth at this level would also benefit from continued infrastructure funding from Government, such as through the Growth Deal and HIF.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - a or b or c

High-level screening conclusion? -the options should be subject to detailed appraisal.

Screened in for detailed appraisal? - Yes

Rationale: These options are about the housing requirement that has been determined as the basis of the Local Plan. The housing requirement may differ from housing need, which is calculated using the Standard Method. The NPPF states the

housing requirement may exceed the housing need, for example to reflect growth ambitions linked to economic development or infrastructure investment. There are growth ambitions for Oxford, but there is also limited capacity. Reflecting these growth ambitions through an increased housing requirement would only lead to a greater level of unmet housing need, which could not be met in Oxford anyway. Setting the housing requirement at the level of the Standard Method need calculation would mean that many other aims and ambitions would need to be compromised, and it is likely would still be unachievable. The housing requirement may also be lower than the need in order to reflect those constraints on capacity (option b).

In terms of sustainability impacts, the most relevant SA criteria are **criterion 4 local housing needs** and **criterion 12, to achieve sustainable economic growth**. However, there is potential for indirect impacts on a broad range of criteria, if the strategy is to attempt to meet housing needs, which would compromise other objectives. Delivery of housing is essential to meet local housing needs, and indicators suggest there are many negative impacts in Oxford from a severe lack of suitable, affordable homes. Housing is also necessary to sustainably support economic growth. There is, therefore, potential for significant impacts from these options and they should be taken forward for further appraisal.

Housing Requirement – Draft policy H1

The preferred approach for the Local Plan 2045 is to have a local policy that sets the total housing requirement over the plan period, and annualised. The housing requirement could be based on the identified need, or could exceed it in order to support a greater level of economic growth. However, the preferred approach is to base the housing requirement on the housing capacity. This is to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would certainly mean that pressure would be placed on other policies aiming to meet the Plan' strategy, such as in relation to green infrastructure .

The options set was tested through the Sustainability Appraisal with Option B performing better in balancing positive and negative impacts. Option B scored positively for meeting housing needs and economic growth because it makes an important contribution to housing need and was more positively scoring compared with the other options in relation to objective 10 (biodiversity), 11 (heritage), 9 (water), 7 (adequate Green Infrastructure) and 2 (resilience to climate change). This is because the capacity-based target can take account of these other considerations. Whereas if the aim was to meet the need above the identified capacity, as in the case of Options A and C, whilst these options do score better than option B for meeting local housing need (objective 4) and achieving sustainable economic growth (objective 12), they also incur significant compromises to other objectives at the same time including the need for green infrastructure, high quality design and climate resilience which is likely to compromise the overall sustainability of the Local Plan.

This means **option B** is proposed as the preferred approach.

Policy options set 001b (draft policy H7): Mix of dwelling sizes (number of bedrooms)

The NPPF sets out an expectation that within the overall aim of meeting an area's identified housing need, should also be the aim to provide an appropriate mix of housing types for the local community. There are a range of considerations in setting a mix, including that some sites and locations will be more suitable for different types of dwelling, and that needs may change over time. Ensuring a range of units sizes is available will be key to meeting a range of needs. The mix could be defined by number of bedrooms or bedspaces.

Table 2 - Policy options set 001b: Mix of dwelling sizes (no. bedrooms)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set a policy mix to ensure a range of sizes of unit for affordable housing only (this would apply to all tenures except the market housing).	It is important that there is a housing mix where possible to meet a wide range of demand. The affordable housing mix will be informed by the housing register (a snapshot in time), existing housing stock, and acknowledgement that tenants' needs change over time and may need to downsize.	A mix can be constraining or occasionally conflict with other aspirations, for example higher densities could be achieved if there was no requirement for large units, or the local context may be more suited.
Exclude certain areas or types of development from any set mix where they would benefit	This ensures that where a mix is most suitable it will bring benefits of ensuring a range of units to meet a range of needs, but where it is not relevant or beneficial there is greater flexibility.	Depending on the exclusions, this may significantly reduce the number of sites where a set mix is required, which could affect the availability of a range of sizes over time.

from greater flexibility. For example exclude smaller sites where there is less opportunity to create a mix, avoid high density areas such as the district centres as they are suitable for small units to further increase density, do not apply to employer-linked housing as there will be specific needs linked to the staff.		
Option b Set a mix for both market and affordable homes and on a broad range of sites, for example including all those over 10 units.	This would help ensure a range of units is available for the open market and to meet the range on the affordable housing register.	This would not allow for a flexible response to the market, to changing needs in an area, or the context of a site. This more prescriptive policy approach would mean that sites at district centres and in the city centre would need to have a range of unit sizes, rather than just those that maximise density, so overall numbers may be reduced. Sites that are best delivered as flats, for example, may not come forward at all if there is a lack of market interest in 3-bedroom flats, for example.

Option c Do not specify a mix of unit sizes for any type of development but do require at least 2 or 3 types of unit size in all developments over, for example, 25 units.	This would enable the mix to be tailored to the site context and the most up-to-date data, for example the current needs on the housing list. It would also ensure there is more than one unit type coming forward. More flexibility would allow more tailoring to the location.	This level of flexibility in the policy requirement could be met by a very limited range of unit sizes. It would be more likely to fail to meet identified needs and could lead to an imbalance in sizes of new units entering the market and available as affordable housing, both in the short term and the longer term.
Option d Do not specify a mix but require the mix to respond to the Housing Register and therefore identified needs.	Such an approach could help ensure that what is being delivered is meeting immediate needs. It would provide an indicative mix which would also be informed by housing officer engagement to ensure that what is delivered is reflective of the most up to date needs.	Such an approach is dependent on reliable and up to date data. The housing list is only a snapshot in time (updated continuously). If for example there are several years with a need mainly for small units and only those are delivered, this will lead to a lack of variety, then in later years when needs may change and there will not be enough larger units to accommodate needs appropriately. This would not achieve mixed or balanced communities. It would not provide enough certainty for developers; a policy with a changing requirement may not be found sound.
Option e Do not include a mix policy.	Provides complete flexibility.	The absence of a policy on housing mix is likely to result in not having the optimum housing mix being delivered for the city. It would be difficult to demonstrate that the Plan is providing for the needs of different groups in the community as per the NPPF. One-bed flats are the smallest and cheapest to build and delivery would be likely to heavily skew towards these.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - various combinations (e.g. either a, c, d, e or a+b or a+c).

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: There is no specific national requirement for a policy although it is indirectly important to helping meet NPPF requirement and there is local context which supports the inclusion of some sort of locally prescribed approach although various constraints in Oxford lead to several potential options for how best to formulate a policy. Options a and c represent different levels of scope over which to apply a mix requirement (applying just to affordable element or market provision too), meanwhile options d and e represent different ways to influence mix without having such a broad mix specification as is presented in options a and c. Option e is simply to not set a local policy in relation to housing mix and could be considered as another different option. Option b is more of an additional dimension to specifying a housing mix policy and could be incorporated alongside either option a or c.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, most directly, this would be **criterion 4. Local Housing Needs** because of how they influence the balance of dwelling sizes that could come forward and help to meet needs of different groups in the community. Indirectly, the options also have impacts that relate to **criterion 5. Inequalities**, with some of them influencing the mix within the affordable housing element which will help to cater for those who have more difficulty accessing affordable housing, as well as **criterion 3. Efficient Use of Land** (because mix can influence how many dwelling on a site) and **criterion 11. Urban design** (influencing housing mix can influence an applicant's ability to reflect local context).

Between the options, the level of sustainability impact is unlikely to vary significantly, with each of the option a, c, d or e likely having a minor positive impact for SA criteria 4. and 5. and minor negative for criteria 3. and 11. There is a potentially more positive and more negative impact in option c that addresses both market and affordable, with these impacts decreasing towards neutral across option a and then options d and c. Option e of not having a policy would likely be a neutral impact in terms of sustainability impacts. Overall, the extent of sustainability impacts is not considered to be significant for any of the criteria regardless of option and the relevant SA criteria that the impacts relate to themselves do not differ significantly between the options, so it is not considered necessary to scope in for detailed assessment.

Section 5 identified that there were a number of topics that the Local Plan 2045 could implement policy to address housing need, requirement and mix. Under each of the topics, there were various options for policy approaches which could be taken, with differing

impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Reg 18 consultation document, is as follows:

Mix of housing sizes – Draft policy H6

The preferred approach for the Local Plan 2045 is to have a local policy that sets a mix of housing sizes in certain circumstances, but for many schemes requires the chosen mix to be justified and explained, but does not set a specified mix. The proposed mix applies only to affordable housing, and excludes the types of schemes where the mix would be difficult to achieve, or conflict with other aims, such as in flats in the city centre or district centres where delivery of only one or two bedroom units helps to achieve density aims and may be more fitting to the infill development often appropriate in these locations.

Whilst either of the four options, option A, B, C or D or various combinations of these could be taken forward, the preferred approach is a combination of **Options A and B** which ensures a mix of affordable home sizes to meet needs over the plan period, requires justification of the selected mix, and provides flexibility to respond to size-specific needs and changing circumstances.

Policy options set 001c (draft policy H8): Loss of dwellings

Given the scale of housing need in Oxford, it is important to ensure that the existing stock is protected otherwise the benefits of delivering new housing would be undermined. The city also faces considerable pressure from the use of residential units as short term lets such as Airbnb which are taking more properties away from family homes or from the longer term private rented sector. There are a range of considerations in setting an approach however the lack of available land and sites can constrain development of other facilities needed to support the local community. Future legislation may help us to control changes of use to short term lets.

Table 3 - Policy options set 001c: Loss of dwellings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Resist a net loss of dwellings	Such specific reasons for an exception could include conversion to a nursery or primary care facility;	The loss of dwellings undermines the benefits of building a mix of new homes.

except for specific reasons.	therefore, introducing some flexibility would allow for the loss of dwellings to provide community facilities, or support/complement existing community uses in the area.	
Option b Resist the subdivision of family homes.	Help maintain the existing supply of family homes to ensure a varied supply of homes across the city.	Precludes the sub-division of the existing housing stock which in some instances would be a better or more efficient use of land in a particular location and provide more homes where the need is so great. The loss of family dwellings undermines the benefits of building a mix of new homes, which include homes suitable for families
Option c Have no restrictions on the loss of dwellings.	No restrictions means that housing stock can be changed as the market demand requires. There would be more flexibility to respond to the market. Overall numbers of homes could increase.	Losing control over the existing supply of housing stock would undermine the benefits of bringing forward housing in new development to meet the population's current and future needs (objectively assessed need).

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? – various options/combinations (option a, b, or c or a combination of options a and b).

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale:

In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Option a seeks to prevent the loss of homes unless their loss would provide or bring improved benefit to the local community. Option b seeks to specifically prevent the subdivision of family homes to help ensure that the

mix of homes available includes those suitable for families. Option c is to not set any restrictions at all via the Local Plan. Option a or b could be carried forward on their own or combined with each other.

In terms of sustainability impacts, the different options all relate primarily to **criterion 4. Housing Need, criterion 6 Essential services and criterion 11 Urban design**. Options a and b are likely to have more positive impacts against criterion 4. Option c could potentially place a greater demand on local services, having the potential to have a negative impact on criterion 6. Option c could also potentially lead to more of a negative impact against criterion 4 as the populations' current and future housing needs are not able to be met and also criterion 11 as the character of the neighbourhood could change as demand for local services could change. Overall, the sustainability impacts do not differ significantly between the options and it is not considered necessary for detailed appraisal.

Development involving Loss of dwellings – Draft policy H8

The preferred approach for the Local Plan 2045 policy is to have a local policy that addresses the protection of existing housing stock. This will help to relieve pressure on the use of dwellings that are of a suitable size for families and assist with the management of demand for residential units to be subdivided or converted or be brought into use as short term lets.

This means either **option A or B**, or a combination of both option A and option B could be taken forward. Option A will help ensure that homes are not lost unless their loss would provide or bring improved benefit to the local community. Option B will help prevent the subdivision of homes and ensure that the mix of homes includes homes that are suitable for families.

Background paper 002

Affordable Housing

This paper explains the key issues relating to affordable housing needs in Oxford, and the context to delivering affordable housing that reflects the local circumstances in Oxford (especially that they need to be truly affordable to Oxford residents).

Relevant Local Plan 2045 Objectives:

- 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.

Relevant SA Objective(s):

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

SEA theme(s):

Material assets, population, human health

1. Introduction	1
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	2
National Planning Policy Framework and Planning Practice Guidance	2
Housing and Planning Act 2016.....	3
Oxford City Council Corporate Strategy 2024-28.....	4
Oxford City Council Housing, homelessness and rough sleeping strategy 2023-2028 ..	4
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	4
Oxford City Housing Register	5
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	6
5. Key issues addressed through the Local Plan	8
Introduction	9
Overall level of affordable housing and tenure split	9
Affordable housing contributions	10
Employer-linked affordable housing	10
Viability cascade.....	11

Appendix A- Policy options and preferred approaches	11
Policy options set 002a (draft policy H2): Affordable housing contributions.....	12
Policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation	14
Policy options set 002c (Draft Policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation	17
Policy options set 002d (Draft policy H5): Affordable housing: financial contributions from new commercial development	19
Policy options set 002e (Draft policy H6): Employer-linked affordable housing.....	22

1. Introduction

1.1 Affordability (or unaffordability) of housing for people living in Oxford is a key issue to address in LP2045 and is also a corporate priority of the City Council more broadly. It is an issue that goes back many years, as a result of the high land values and property prices in Oxford not being matched by salaries, resulting in many people being priced out of the market to buy or to rent homes in Oxford.

1.2 The problems cannot be solved by planning policies alone, but LP2045 can help to address it alongside other Council initiatives and programmes including the Affordable Housing Delivery Programme and the Council's housing company OX Place delivering affordable homes.

1.3 This paper explains the key issues relating to affordable housing needs in Oxford. It then explains how LP2045 could seek to address these needs with policies to deliver affordable housing that reflects the local circumstances in Oxford and that is truly affordable to Oxford residents.

1.4 This paper helps to explain the following housing-related topics:

- Delivering affordable homes (contributions from residential developments)
- Affordable housing contributions from new purpose-built student accommodation
- Affordable housing contributions from self-contained older persons accommodation
- Employer-linked affordable housing.

1.5 This paper focuses on the affordability of housing and factors affecting the delivery of affordable housing, whilst Background Paper 003 covers specialist housing need.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework and Planning Practice Guidance

2.1 The [National Planning Policy Framework](#) (NPPF) sets out that Local Plans should deliver a sufficient number and range of homes to meet identified housing need, including affordable housing. It defines affordable housing in Annex 2 of the [NPPF](#). The

Planning Practice Guidance (PPG) sets out further clarification about how the NPPF should be applied, including how to calculate affordable housing need and supply.

2.2 Elements of national policy and guidance that are particularly relevant to delivering affordable housing in Oxford are:

- The threshold of 10 dwellings for seeking developer contributions towards affordable housing (thereby exempting developments of 1-9 dwellings from affordable housing requirements) ([PPG](#) paragraph 023).
- The [Viability](#) PPG sets expectations for the viability assessment with the intention of creating realistic, deliverable policies based on sites which are likely to come forward. Affordable housing provision is a significant consideration.
- The Permitted Development Rights (General Permitted Development Order) for conversion of office to residential, which has a similar impact of effectively exempting those conversion developments from affordable housing contributions.

2.3 The former NPPF requirement to include First Homes in the affordable housing mix, has now been removed from the NPPF (explained in footnote 31 of [NPPF](#)). Instead, there is greater emphasis on delivering social rent (paragraphs 63 and 64 of the [NPPF](#)). These amendments to the NPPF are more closely aligned with the aspirations in Oxford for affordable housing that is truly affordable to those in Oxford in housing need.

Housing and Planning Act 2016

2.4 The Housing and Planning Act (2016) sets out measures intended to boost the supply of new housing nationally, to devolve significant new powers to a local level, and to support first time buyers to make home ownership more affordable. There were also various reforms to social housing, which do not directly impact the delivery of new affordable housing but do affect the supply of Social Rent housing available because of initiatives such as right to buy.

Oxford City Council Corporate Strategy 2024-28

2.5 The City Council [Corporate Strategy 2024-28](#) identifies housing affordability as a key issue facing the city, both for local people and local employers. The Corporate Strategy identifies delivering good, affordable homes as one of the key priorities.

Oxford City Council Housing, homelessness and rough sleeping strategy 2023-2028

2.6 Oxford City Council's [Housing, homelessness and rough sleeping strategy 2023-2028](#) sets out intentions to provide more affordable and low carbon homes, alongside wider intentions to improve conditions for those renting homes, and to prevent homelessness and rough sleeping. Providing more affordable homes is identified as a key priority, and actions to deliver this include OX Place delivering a build programme, working with housing associations to build new homes including Social Rent, and working with neighbouring councils to ensure that more affordable housing is built in and around Oxford.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Oxford is one of the least affordable cities, due to the mismatch between average house prices/rent levels and average salaries (the affordability ratio). The high cost of housing in Oxford, compared to wages, (known as housing affordability) has many impacts and consequences, and many people who work in Oxford cannot afford to live here. [The English Indices of Deprivation 2025 \(IoD 2025\)](#) is the most recent measure of relative deprivation across small areas of England. It shows that Oxford has become relatively less deprived in the income domain. Oxford ranks 210 out of 296 most deprived nationally in terms of average score for income. Where 1 is most deprived and 296 is least deprived. This is a reduction since 2019, when Oxford ranked 201 out of 317. However, at the Lower-Layer Super Output Area (LSOA) level, Oxford still has 8 areas in the bottom 20% for income (compared to 9 LSOAs in 2019). This suggests that whilst Oxford is becoming relatively less deprived overall, there are still pockets of income deprivation prevalent within the city.

3.2 In August 2024 the [average house price in Oxford](#) was £489,000. This is more than 12 times the average household earnings; this makes it one of the least affordable places in the country. This has consequences for the economy and key services, as employers struggle to attract and retain staff, including essential hospital staff, health and social care workers, teachers, as well as those in retail, hospitality, and office workers. There are also potential social impacts on families and communities who may be split up because of housing costs. Even when applying so-called affordable housing purchase products, such as shared ownership or First Homes, it is still unaffordable for many people in Oxford to own their own home.

3.3 As a consequence of high house prices, there is a large private rented sector in the city. However, rent levels are also very high, so renting a home via the private-rented sector is also out of reach for many people. The average private rent in Oxford is [£1,725 a month](#) (September 2024). This can result in Oxford's workforce needing to share rented accommodation or needing to commute into the city in order to find suitable accommodation. It also means that Social Rent housing plays an important role in meeting affordable housing needs in Oxford.

3.4 Social Rented housing is the lowest cost compared to market values. Tenants rent from the City Council or a Housing Association, usually at about 40% of market cost (ie what a private landlord would charge for the same home). Thus as the lowest cost option it helps provide housing for those in greatest need. Unsurprisingly, there is a huge demand for this type of housing in the city, yet it is also the most expensive to build (due to the larger discounts on returns). There are also significant numbers of people who do not have sufficient priority on the housing register to be considered for Social Rent (when compared to households in even greater housing need), yet market housing is also out of reach. So it is also important that intermediate types of housing (such as shared ownership models) continue to be provided as well.

Oxford City Housing Register

3.5 The Oxford City Council Housing Register records how many people have registered to apply for Social Rent housing in the city. There are currently (January 2026) just under 4,000 residents on the housing register, and it is expected that only around 12% of these will be housed within a year.

3.6 Regardless of the method used, Oxford is one of the most expensive places to buy or rent a property in comparison with monthly earnings, as a result of high land values, limited land availability, and a shortage of homes. This means that housing is so expensive - in absolute terms and compared to average salaries - that many people are priced out of the market and many people who work in the city are unable to afford to live here.

Affordable housing delivery

3.7 The City Council has been working to increase the delivery of affordable homes through a number of measures across council departments. Some affordable housing is delivered through planning permissions on qualifying sites, some is delivered directly by the City Council through the affordable homes programme, and some is delivered via the City Council's Housing Company OX Place. There are also various other complementary programmes and initiatives by the City Council to tackle homelessness and reduce empty homes.

3.8 Table to show affordable housing completions in Oxford 2016/17 to 2023/24, taken from [Authority Monitoring Report 2023/24](#):

Table 3.1

Year	Affordable housing completed
2016/17	20
2017/18	17
2018/19	105
2019/20	104
2020/21	144
2021/22	274
2022/23	273
2023/24	61

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 One of the biggest issues facing residents in Oxford is the unaffordability of homes, to rent or to buy. Overall the affordability of housing in Oxford is likely to continue to be an issue in future, as the lack of land for housing (including for affordable housing) and increasing land values push house prices up further. [Research](#) suggests that social and affordable housing accommodation is likely to need to continue to play an important role for Fast Growth Cities (FGCs) such as Oxford and Cambridge, where overall increases in the housing stock are unlikely to fully address affordability issues alone.

4.2 The supply of affordable homes to meet need in Oxford is likely to remain a challenge, particularly Social Rent, but also market rates and discounted purchase options, such as shared ownership. Market rental prices are also likely to continue to increase as the unaffordability of buying homes puts additional pressure on the rental market. In turn this also affects the types of homes required, and there is already high demand for shared accommodation in the private rental sector as a lower cost option than renting or purchasing individual properties.

4.3 The supply of affordable housing is being challenged due to the compounding impact of: a general lack of land supply for new homes within Oxford, losses through Right to Buy, especially since the increased discount introduced in 2012; changes to national policy which reduce the opportunities for delivering new affordable homes through developer contributions, for example the city is not allowed to secure affordable homes when new homes are delivered via office to residential prior approval B56 permissions, and even with an updated local plan this situation would not change; and caps on rental incomes for local authorities or registered providers which are set nationally.

4.4 Together these factors are likely to impact on the overall numbers of new affordable homes delivered, as well as the mix and balance of communities in Oxford during the Plan period.

4.5 If the affordability of housing worsens, then there would also be other knock-on effects because it affects not just where people can afford to live and quality of life, but also impacts the economy as employers in key sectors in Oxford already have problems recruiting and retaining staff. If economic growth is constrained, then this affects not just Oxford but the wider region and even the national economy as Oxford is a net contributor nationally.

4.6 The City Council is committed to the delivery of affordable housing through several initiatives which are outside of the local plan and would happen anyway without the plan. The City Council has set up OX Place as a wholly owned company, which has an aim of delivering more affordable housing. The Council's Affordable Housing Delivery Programme also directly delivers new homes as well as taking on homes from developer contributions. But there also needs to be supply from other sources (through developer contributions and housing associations) so overall it would be more difficult to deliver affordable housing without an up-to-date local plan.

4.7 The City Council has also been working with the other Oxfordshire district councils to help deliver homes to address Oxford's unmet need outside the city boundary. Neighbouring Local Plans make provision for these additional homes, including delivery of affordable homes. The City Council has been working with its partners on the allocation policy and management of those new affordable homes in adjoining districts, in particular ensuring that those on Oxford's housing register will be eligible to apply for the new homes. However without an up-to-date local plan to establish the housing need and housing requirement then it is less certain that unmet need within adjoining districts would be delivered because it would be difficult for those

authorities to deliver additional housing over and above their own requirements if it has not been tested by an Inspector.

4.8 Affordability is also influenced by government policies related to incentivising home ownership and house building including delivery of affordable housing, which would influence affordable housing delivery in Oxford with or without a plan.

4.9 Most of these initiatives focus on helping people to purchase homes, however the nature of the housing market in Oxford means that even with those support measures, purchase options are still out of reach for many people in Oxford and/or they are not workable or viable for developers. Recently the NPPF was updated and no longer requires First Homes to be included within the affordable element of proposals.

4.10 So overall these national initiatives in terms of affordable housing delivery, and especially Social Rent, may be fairly limited in terms of take-up and their effectiveness in addressing housing needs in Oxford because the high prices and unaffordability pressures simply do not fit with the national models. Which is why local policies are needed in the LP2045 which are bespoke to address the particular circumstances and housing needs in Oxford.

4.11 In recent years, external economic factors – including Brexit and the war in Ukraine – have also affected construction costs and availability of materials, as well as rises in the costs of borrowing. These have significantly affected the viability of developments, as explained in more detail in the Viability Study. This affects how much value can be captured to deliver public goods, such as affordable housing, and also the supply of housing generally.

5. Key issues addressed through the Local Plan

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to affordable housing objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them. This background paper relates to

Policies H2, H3 and H4 of the Submission Draft Oxford Local Plan 2045. The policies options considered at Regulation 18 (shown in Appendix A) split draft policies requiring contributions to affordable housing into three- student accommodation contributions, contributions from commercial/employment and contributions from self-contained older persons accommodation. However, these have now been combined into one policy because of the overlaps between them. There have been further refinements, e.g. to be clear about the type of commercial/employment development that contributions to affordable housing is expected from, but the basic approaches have not changed.

Overall level of affordable housing and tenure split

5.3 Since the adoption of the OLP2036 (June 2020), several factors have resulted in needing to review the adopted policy approach of seeking 50% affordable housing (H2 in OLP2036) in the OLP2045. These factors include the impacts of a range of global and international factors on inflation, build costs and supply chains, all of which have added to the finance costs of development. This has impacted on viability and subsequently the capacity for residential development to deliver affordable housing (and other) contributions for the public good. These impacts were explored in the Viability Study 2026.

5.4 In preparing the LP2045 there are two key principles that we are seeking to balance in setting the levels in the developer contributions policies:

- To maximise the community benefits from developer contributions but without undermining the delivery of sites/the Plan; and
- To set the levels so that most schemes can viably deliver the policy requirements, whilst also retaining some flexibility to take site-by-site circumstances into account where necessary (but this should be only a minority of schemes, in order to not add unnecessary complexity or delays to the development management process).

5.5 The tenure scenarios tested were 80% social rented and 20% intermediate housing, and 70% social rented and 30% intermediate housing, both within an overall affordable housing percentage increasing in 5% intervals from 0-50%. Results were assessed for the four selected benchmark land values (BLVs) considered in the viability assessment, which were secondary offices, secondary retail, secondary industrial and greenfield/undeveloped sites. The results are summarised in Appendix 6 and Appendix 7 of the viability assessment.

5.6 There are large differences in terms of the level of affordable housing that can viably be provided, depending both on the area and also the different BLVs. When tested against the highest benchmark values (secondary office and secondary retail uses), many schemes are unviable even with very low levels of or even no affordable housing. It is clear that some BLVs are highly unlikely to come forward for housing of any type in

the current climate, so attempting to set affordable housing levels very low to make these BLVs viable in only some areas is not a sensible approach. Instead, the focus has been on setting affordable housing at a level viable for most types of schemes in most areas for the BLVs that would viably deliver housing (i.e. secondary industrial and greenfield/undeveloped sites, rather than secondary retail and secondary offices).

5.7 Policy H2 sets the affordable housing target at a level that prioritises social rented tenure and is likely to be viable for most schemes with a BLV that would realistically come forward for housing.

Affordable housing contributions

5.8 For other types of residential development where the site would have otherwise been suitable for C3 residential development, and therefore assumed to be making a contribution towards affordable housing (purpose-built student accommodation and older persons accommodation), then Policies H3 sets out the contribution that will be sought for provision of affordable housing off-site.

5.9 Commercial developments have the potential to generate demand for affordable housing. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of affordable housing. Therefore, there is a clear justification for the introduction in Policy H3 for a requirement for contributions from employment development to affordable housing. The intention when setting the level for these contributions is that it is guided very much by the viability report, so that it is set at a level that is easily affordable, whilst still ensuring a contribution is made to meeting the affordable housing needs generated by this kind of development. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.

Employer-linked affordable housing

5.10 The other important policy in delivering affordable housing in Oxford to complement the policies above, is the employer-linked affordable housing policy H4, which is also intended to boost the supply of affordable housing where there are willing employers. In Oxford, there is high demand for accommodation in the private rental sector as a lower cost option than renting or purchasing individual properties. The employer-linked policy was first introduced in Oxford in the LP2036 as an innovative way for employers to address this issue by allowing the creation of "employer-linked affordable housing" as an alternative to the provision of the traditional "market and affordable" split. This unique tenure allows employers (such as the University of Oxford or the Hospital Trusts), to provide accommodation for their workers at reduced rents on sites owned by them, where the prospect of Socially-Rented accommodation coming

forward at these sites would prejudice the delivery of homes for staff who would potentially not be able to afford to live in the city. Monitoring of the LP2036 policy shows that affordable homes are being delivered in this way, such as at the John Radcliffe site, so the principle has been carried forward into Policy H4, following further engagement with key employers.

5.11 The list of specified sites reflects willing landowners, plus crucially they are sites that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

Viability cascade

5.11 Linked to these policies, it is also important that the Plan includes an overall viability policy to ensure that none of the policies requiring affordable housing contributions would risk development becoming unviable. This is addressed in the cascade approach for sites if the full policy requirement for affordable housing contributions is not viable. The viability cascade is set out in Policy V4, which cascades through the policy approaches that are likely to have the biggest effect on viability, prioritising delivery of affordable housing, particularly social rented housing.

Appendix A- Policy options and preferred approaches

Policy options set 002a (draft policy H2): Affordable housing contributions

Securing new affordable housing as part of larger developments is a significant way that more affordable homes can be provided in Oxford. In successive Plans the City Council has adopted policies that require the delivery of an ambitious percentage of affordable housing. These contributions – whether onsite or financial – have made a significant contribution to the supply of affordable homes in Oxford.

With any policy about contributions towards affordable housing there are various policy decisions to reflect how to direct those contributions towards most effectively delivering homes to meet the needs of local people in the specific context of Oxford. For example whether to prioritise affordable housing to rent or to buy; whether to maximise the number of affordable homes or the greatest levels of subsidy of the homes (but fewer affordable homes as they cost more in contributions); or whether to prioritise developer contributions towards other public benefits.

Table 1: Policy options set 002a Affordable housing contributions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek to maximise the overall number of affordable homes delivered through contributions	This would help to maximise the number of affordable homes, and to meet a range of different affordable tenures including for those who are seeking affordable home ownership options. Encourages a mix of tenures onsite. More flexibility to respond to market demands to help site viability.	To be viable, this option is likely to mean a lower proportion of Social Rented homes, and a larger proportion of intermediate tenures of affordable housing such as shared ownership, so would not help as many people on the housing register. Options other than Social Rent are not affordable to many of those in need of affordable housing in Oxford because of the prices to wages ratio in Oxford.
Option b Focus on maximising the number of Social Rent homes from developer contributions, even if this means fewer	This option would prioritise delivering affordable homes for those in the greatest housing need, that would not be able to afford alternative affordable housing tenures.	This is likely to result in the delivery of fewer affordable houses overall from contributions (because they cost more for developers to deliver), which could in turn worsen the level of affordable housing need if supply slows while demand continues.

affordable homes overall		Option does not help meet the needs of households that could afford shared ownership/ low-cost home ownership models. It would also not encourage mixed communities to focus on just one tenure or form of affordable housing.
Option c Do not maximise affordable housing contributions but set them at a lower level of contribution that leaves more opportunity for alternative developer contributions or greater profit margins.	This would allow for developer contributions to be directed to delivering other infrastructure or public benefits. A greater profit may also encourage delivery of sites for residential uses and make the profit levels more competitive against other land uses which are currently more attractive to developers in terms of profit levels (mainly R&D uses in recent years).	This approach would fail to maximise opportunities to address the affordable housing crisis and inequalities, and it is not necessary in order to encourage sites to come forward because that would be tested through the preparation of the local plan.
Option d Do not include any policy requiring affordable housing contributions.	This would minimise risk of affordable housing contributions negatively impacting on viability of sites, and it would allow maximum contributions towards other infrastructure and public benefits.	This would not at all be attempting to meet affordable housing needs, which would be contrary to the NPPF, so would not be a sound approach. It would also do nothing to address the housing crisis in Oxford or reducing inequalities.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? A or b or c or d High-level screening conclusion? the options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: These options are about how to prioritise developer contributions from residential development in order to deliver public benefit in the form of affordable housing, which is a local priority. Options a and b prioritise delivering affordable housing, whilst option c prioritises affordable housing to a lesser degree (alongside other contributions or greater profits for the developer) and option d would set no local steer on affordable housing contributions. Options a and c are about the overall affordable housing requirement, usually as a percentage of the development, whereas b is about which tenure split to prioritise within that requirement. In terms of sustainability impacts, options a and b, would score positively against criterion 4 local housing needs by contributing to ensuring that everyone has the opportunity to live in a decent affordable home. Option c is also likely to contribute towards

criterion 4 plus other sustainability objectives such as **criterion 7. Green infrastructure** or accessibility/transport under **criterion 8** however these are likely to be minor positive impacts and would depend very much on implementation on a case-by-case basis what the contributions were targeted to. Option d would not help to meet **criterion 4**, nor would it be consistent with the NPPF which requires plans to making provision for housing including affordable housing (para 20). Similarly, by delivering affordable housing, options a, b, c would all score positively against **criterion 5 inequalities**, because access to affordable housing is a factor in reducing inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Delivering Affordable Homes – Draft policy H2

The preferred approach for the Local Plan 2045 policy is to take forward a combination of Options A and B. So the overall target is that sites should contribute 40% of the homes in a development as affordable housing, on qualifying residential developments (of 10 or more C3 units, or equivalent number of C2 rooms). Within that 40% the draft policy also seeks to prioritise delivery of social rent homes, requiring 80% of the affordable homes to be social rent, with the remaining as intermediate tenures.

The viability evidence does not identify a particular level of affordable housing that most schemes could viably deliver but suggests that a large proportion of the types of typical residential developments expected during the plan period could deliver this level. So whilst the 40% target is ambitious, the viability evidence suggests it could be applied on a maximum reasonable proportion basis whilst also allowing sufficient scope to meet other draft policy requirements.

Setting a lower proportion of affordable housing (either in part or the whole of the City) is likely to result in a lower overall number of affordable units being delivered, as sites that could have delivered more than the revised target would no longer do so. Affordable housing delivery can therefore be maximised by adopting an ambitious target and accepting that this will not be universally achieved on all developments. Hence alongside this policy, there is also Draft policy S4 which sets out a viability cascade, to ensure that the contributions towards affordable housing do not make any developments unviable.

Policy options set 002b (draft policy H3): Affordable housing: financial contributions from new student accommodation

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

Table 2: Policy options set 002b Affordable housing: financial contributions from new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek a financial contribution from <u>all</u> student accommodation developments, towards affordable housing	In many situations, affordable housing would not be suitable to be provided on student sites. Therefore, a financial contribution towards provision of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured separately. The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from student developments equivalent to <u>10 or more</u> self-contained units [the same threshold as residential developments] or 25+ student rooms	This would mean that the financial contributions from student accommodation are sought on a comparable basis to residential development. It would also maximise the level of contributions towards much-needed affordable housing.	None identified.
Option c Only require financial contributions from <u>larger</u> student schemes, for example of <u>more than</u>	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings. This could encourage landowners to opt for student accommodation in unsuitable locations instead of residential homes and would not help to

50 rooms (or 20 self-contained units).		address the constrained supply of new homes in Oxford or to meet housing needs within Oxford.
Option d Require affordable housing to be delivered <u>on-site</u> within larger student developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.
Option e Do not require an affordable housing contribution from any student accommodation developments	None identified.	This would make the development of student accommodation disproportionately more viable and therefore attractive to developers, than the development of general housing which would result in sites suitable for housing being delivered for student accommodation instead. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or c or d or e

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: These options are about whether to seek contributions towards affordable housing from student accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for student accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes or equivalent number of student rooms at a ratio of 2.5:1) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs.

In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these

objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Affordable housing contributions from new purpose-built student accommodation – Draft policy H3

The preferred approach for the Local Plan 2045 policy is to take forward Option B, so that contributions from student developments are sought on a comparable basis to residential schemes i.e. for the equivalent of 10 self-contained dwellings. The Government Housing Delivery Test sets out a ratio of 2.5 student bed spaces to 1 dwelling. Therefore, with the threshold at 10 dwellings for residential development affordable housing contributions, the threshold for student accommodation will be 25 bed spaces (or 10 or more self-contained student units as these are counted in monitoring terms as a dwelling). The viability evidence suggests that a large proportion of the types of typical student developments expected during the plan period could deliver this level. Exemptions are specified in the policy where contributions would not be sought.

The draft policy seeks financial contributions towards affordable housing (rather than onsite provision) because in many situations, affordable housing would not be suitable to be provided on student sites, for example student accommodation is typically flats so in practice it would be difficult to provide separate entrances.

Policy options set 002c (Draft Policy H4): Affordable housing: financial contributions from self-contained older-persons accommodation

Many sites for self-contained older persons accommodation could equally be suitable for mainstream residential development, from which an affordable housing would normally be sought. As such, it is reasonable for the Plan to include a policy which seeks affordable housing contributions from those developments.

Table 3: Policy options set 002c: Affordable housing: financial contributions from self-contained older-persons accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek a financial contribution from <u>all</u>	In many situations, affordable housing would not be suitable to be provided on older persons sites. Therefore, a financial contribution towards provision	The seeking of financial contributions provides less certainty than developing on-site affordable housing because sites would need to be secured

self-contained older persons accommodation developments, towards affordable housing	of affordable housing elsewhere within Oxford would help towards meeting affordable housing needs from sites that could otherwise be making contributions from residential development on such sites.	separately. The thresholds for qualifying sites would need to be tested through plan viability.
Option b Require financial contributions from developments equivalent to <u>10 or more</u> self-contained units [the same threshold as residential developments]	This would mean that the financial contributions are sought on a comparable basis to residential development. It would also maximise the level of contributions towards much-needed affordable housing.	None identified.
Option c Only require financial contributions from <u>larger</u> development, for example of <u>more than</u> 20 self-contained units.	None identified.	This would result in a reduced financial contribution from what would be sought if the site was for general housing where the threshold is 10 dwellings.
Option d Require affordable housing to be delivered <u>on-site</u> within larger older-persons developments	Provides more certainty that affordable housing would be delivered if it is provided by the developer as part of the development.	In many situations, onsite provision of affordable housing within new developments for older persons such as retirement complexes, is unlikely to be appropriate because of the different housing needs and lifestyles. Management agreements and other restrictions (e.g. car parking) are also imposed which are also not necessarily appropriate to general housing.
Option e Do not require an affordable housing contribution from any older-persons accommodation developments	None identified.	This would make the development of older-persons accommodation disproportionately more viable and therefore attractive to developers. This would not help to address the constrained supply of new homes in Oxford. It would also result in the loss of any financial contribution towards affordable housing that would have been secured if the site

		was being developed for general housing, so would result in fewer affordable homes provided in Oxford.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or c or d or e

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: These options are about whether to seek contributions towards affordable housing from self-contained older-persons accommodation developments, and about what size developments that requirement should apply to. Sites that are developed for older-persons accommodation are also often suitable in principle for residential development, so seeking contributions on a comparable basis (ie for sites delivering 10 or more homes) helps to ensure that sites are not unduly prejudiced against providing residential accommodation on the basis of viability, as well as providing an additional contribution source of much-needed affordable housing to address local needs.

In terms of sustainability impacts, options a, b, c, d would all help to deliver affordable housing so would score positively against **criterion 4 local housing needs** and **criterion 5 inequalities**, with option a having the greatest potential positive impact because it would apply to the greatest number of developments. Whereas option d would do nothing to help achieve either of these objectives. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Affordable housing contributions from self-contained older-persons accommodation – Draft policy H4

The preferred approach for the Local Plan 2045 policy is to take forward Option B. This would mean that the financial contributions are sought on a comparable basis to residential development, whilst also maximising the level of contributions towards much-needed affordable housing.

Policy options set 002d (Draft policy H5): Affordable housing: financial contributions from new commercial development

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

Table 4: Policy options set 002d Affordable housing: financial contributions from new commercial development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Commercial developments have the potential to generate demand for affordable housing. Option would support economic growth by helping to deliver affordable housing to support a local workforce. Lack of affordable housing is often referenced as a constraint on Oxford's economic potential, and employers report difficulties in attracting and retaining staff because of the lack of affordable housing. Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing.	Requiring financial contributions towards affordable housing could impact on viability of developments, especially in the period soon after adoption, because this is not currently a local policy requirement so schemes already in the pipeline may not have factored it into costs. This could however be mitigated with a viability cascade to ensure that the policy does not prevent sites being developed. Furthermore in recent years the viability of commercial developments has been very strong in Oxford, outstripping even residential developments. Option would also need to be tested via a viability assessment to check that this typology of site could deliver the policy requirements.
Option b Do not require financial contributions towards off-site affordable housing from major commercial developments (over 1000sqm or 1ha)	Financial contributions could be sought towards alternative public benefits eg public transport as part of travel to work to support sustainable commuting to the site.	Option would not help to deliver affordable housing at all, with knock on effects for employers trying to attract and retain staff.

Option c Require onsite provision of affordable housing as part of major commercial developments (over 1000sqm or 1ha)	Provision of affordable housing close onsite has the potential to reduce commuting and help address recruitment issues, although the residents would depend on implementation (the tenure and allocations policy) as to who could access the homes. Introducing residential to areas which are solely employment presently, could help to bring more vibrancy to areas of Oxford which are otherwise only occupied for part of the day/week.	Onsite provision may not be feasible or practical on all sites depending on the size and location of the site, for example if the site adjoins land uses which are not compatible with residential, or if the site is located within a larger employment park which would otherwise be empty overnight and/or weekends it may not be a pleasant living environment, or on sensitive sites such as hospital sites where employers would only wish to house their own staff for security reasons. This would depend on implementation, and certain exclusions may be justifiable eg to exclude on-profit making sectors such as health and education. It could also impact on viability if the employment use cannot be maximised on the site, or could constrain the economic potential of the site. A cascade policy would be needed to ensure the policy does not prevent sites being developed, with an option to revert to equivalent off-site financial contributions if appropriate.

Initial sustainability appraisal screening of options sets Is there only one option or are there various options we could take? a or b or c High-level screening conclusion? the options are similar to each other from a sustainability perspective Screened in for detailed appraisal? No Rationale: These options are about whether to seek contributions towards affordable housing from commercial developments, and about whether the contribution should be via financial contributions or via onsite provision of homes. Commercial developments can generate demand for affordable housing, so these options therefore seek contributions towards addressing that. In terms of sustainability impacts, options a and c would all help to deliver affordable housing so would score positively against criterion 4 local housing needs and criterion 5 inequalities. Whereas option b would do nothing to help achieve either of these objectives. By helping to address affordable housing needs, options a and c would also support criterion 12 economic growth because affordable housing is often reported by employers as a key issue affecting recruitment and retention especially in essential

sectors such as health care and schools, as long as there is a viability cascade to ensure the contribution does not prevent sites coming forwards. Option b would not help to address affordable housing needs but could mean more contributions could instead be used towards other public benefits eg public transport improvements to support employment and sustainable travel to work which would deliver alternative sustainability benefits. The options do not really affect the other sustainability objectives. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal. Implementation may need exclusions for certain types of employment site eg hospitals and schools.

Employer-linked affordable housing – Draft policy H5

The preferred approach for the Local Plan 2045 policy is to take forward Option A. To allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).

The list of specified sites reflects willing landowners, plus crucially they are sites that would otherwise not be available for residential uses (for example on operational campuses, health facilities, or education sites), if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an allocations policy and rent levels.

Policy options set 002e (Draft policy H6): Employer-linked affordable housing

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

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

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

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

Table 5: Policy options set 002e Employer-linked affordable housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).	Provides an alternative mechanism for employers to actively help address affordable housing issues for employees, which although the homes would only be for staff, the provision of homes in turn could help reduce pressure on the housing register. Could support wider objectives of the Plan such as supporting economic growth with a sufficient workforce, and decreasing need to travel. The option could help to bring forward sites which landowners would otherwise not make available for residential uses (for example by being located on operational campuses, health facilities, or education sites).	Limited number of employers could benefit as they would need to own (suitable) land to build on and be able to act as a developer. It is important that this policy does not undermine delivery of Social Rent housing because the homes would only be available to employees of the organisations and not to those on the housing register (those in greatest need). Hence it should be restricted only to sites unlikely to deliver affordable general needs housing to households in housing need.
Option b Do not include an employer linked housing policy.	Less risk of undermining delivery of much-needed Social Rented housing, if the site were to be developed then the normal affordable housing tenure split would apply including provision of social rent.	Landowners may be put off bringing forward certain sites, if the development would not be solely for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Removing this policy could exclude an alternative potential supply of affordable housing or sterilise sites.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b

High-level screening conclusion? the options should be subject to detailed appraisal.

Screened in for detailed appraisal? - Yes

Rationale: These options are about whether to allow certain employers on certain sites, to develop those sites as affordable housing for rent solely for their own staff. As the site would be 100% affordable housing, the normal affordable housing tenure policies would not apply but would be agreed on a site-by-site basis to reflect the requirements of the workforce of that specific

employer. There is no specific policy framework for this type of provision in national policy, so the options are whether to have such a policy or not.

In terms of sustainability impacts, option a would contribute positively towards **criterion 4 local housing needs** and **criterion 5 inequalities**, and also **criterion 12 economic growth**. Under option b, the normal affordable housing tenure requirements would apply which would include social rent, however landowners may not develop the site if it cannot be guaranteed for their own staff e.g. on sensitive sites like hospital sites where landowner may wish to only have staff living. Option b could therefore exclude an alternative potential supply of affordable housing or sterilise sites. Likely impacts of option b are therefore dependent on implementation, as it could mean sites developed for residential or it could mean sites not developed at all, entirely dependent on the landowner's intentions.

Affordable housing contributions from commercial developments – Draft policy H6

This is a new policy, which needs further testing through the Regulation 18 consultation and viability. As such there is no preferred approach identified at this stage.

Background paper 003

Specialist housing including student accommodation, self-build, elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.

This paper addresses Oxford's circumstances in relation to specialist housing provision including the provision of student accommodation, self build housing, housing for elderly persons, gypsy, traveller and travelling showpeople and boat dwellers.
Relevant Local Plan Objective(s): • Provide access to affordable, high-quality and suitable accommodation for all.
Relevant SA Objective(s): 4. To meet local housing needs by ensuring that everyone has the opportunity to live in a decent affordable home.
SEA theme(s): Material Assets, Population, Human Health.

1. Introduction	1
Student Accommodation.....	1
Self-Build and Custom Housebuilding	1
Elderly persons and other supported care housing.....	2
Gypsy, Traveller and Travelling Showpeople	2
Boat Dwellers	2
Boarding School Accommodation.....	2
Houses in Multiple Occupation.....	2
2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	2
National Plans, Policies and Programmes	2
National Planning Policy Framework and Planning Practice Guidance	2
Student Accommodation	3
Self-Build and Custom Housebuilding	3
Elderly persons accommodation	4
Gypsy, Traveller and Travelling Showpeople	4
Boat dwellers	4

Boarding School Accommodation.....	4
Houses in Multiple Occupation	4
Regional and Local Plans, Policies and Programmes	5
Student accommodation needs assessment.....	5
Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment	5
Specialist and Supported Housing Needs Assessment	6
Oxford Local Plan 2036	6
Student Accommodation	6
Self-Build and Custom Housebuilding	7
Elderly persons accommodation	7
Gypsy, Traveller and Travelling Showpeople	7
Boat Dwellers	8
Boarding School Accommodation.....	8
3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)	8
Student Accommodation.....	8
Self-Build and Custom Housebuilding	8
Elderly persons and other supported care	9
Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers	9
Boarding School Accommodation.....	9
Houses in Multiple Occupation.....	9
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	10
Student Accommodation.....	10
Self-Build and Custom Housebuilding	10
Elderly persons and other supported housing	10
Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers	11
Boarding School Accommodation.....	11
Houses in Multiple Occupation.....	11
5. Key issues addressed through the Local Plan	11

Introduction	12
Student Accommodation policy approach.....	12
Self-build and Custom housebuilding.....	17
Elderly persons accommodation	18
Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers	19
Boarding School Accommodation.....	19
Houses in Multiple Occupation.....	20
Appendix A: Options considered at Regulation 18	20
Policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO).....	21
Policy options set 003b (draft Policy H10): Location of new student accommodation...	24
Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs	29
Policy options set 003d (draft policy H12): Homes for travelling communities.....	32
Homes for Travelling Communities – Draft Policy H12	33
Policy options set 003e (draft policy H13): Homes for boat dwellers	34
Homes for Boat Dwellers – Draft Policy H13.....	36
Policy options set 003f (draft policy H14): Elderly persons’ accommodation and other specialist housing needs	36
Older Persons and Other Specialist Accommodation – Draft Policy H14	38
Policy options set 003g (draft policy H15): Self-build and custom house building options	39
Self-Build and Custom Housebuilding – Draft Policy H15	42
Policy options set 005h (draft policy H15): Community-led housing options	43
Policy options set 003i (draft policy H16): Boarding School Accommodation	45
Boarding School Accommodation – Draft Policy H16.....	46

1. Introduction

- 1.1 This Paper considers the need for and policy response to various types of specialist housing accommodation. Housing need is considered in Background Paper 001, but in addition we are required to consider the needs for particular types of housing and occupants. Affordable housing need is discussed in Background Paper 002. This paper focuses on student accommodation, self-build and custom build homes, elderly persons and other supported care housing, gypsy, traveller and travelling showpeople, and boat dwellers.

Student Accommodation

- 1.2 There are two higher education institutions within Oxford – University of Oxford and Oxford Brookes University, and also a campus of the University of West London in Dunstan Road. Provision of good quality, well managed student accommodation will be required, located in close proximity to those institutions.

Self-Build and Custom Housebuilding

- 1.3 Oxford's communities are varied, with differing needs for housing provision. With affordability issues, self-build and custom housebuilding can provide opportunity for individuals and groups to access the housing market a different way.

Elderly persons and other supported care housing

- 1.4 There are various types of supported housing, mainly provided for elderly persons, but also for others with specialist housing and additional care needs.

Gypsy, Traveller and Travelling Showpeople

- 1.5 The Traveller community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans. Current and future accommodation needs for travelling communities were last assessed in 2024 at an Oxfordshire-wide level.

Boat Dwellers

- 1.6 Residential boats and their dwellers on both permanent and temporary visitor moorings, contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable.

Boarding School Accommodation

- 1.7 Oxford is home to several boarding schools which provide accommodation for their students.

Houses in Multiple Occupation

- 1.8 This paper sets out the context for Houses in Multiple Occupation (HMO) in Oxford.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Plans, Policies and Programmes

National Planning Policy Framework and Planning Practice Guidance

- 2.1 The [National Planning Policy Framework](#) (NPPF) makes it clear that to support the Government's objective of significantly boosting the supply of home, planning authorities should address the needs of groups with specific housing requirements and that policies should be informed by a local housing need assessment. At paragraph 63, the NPPF states *'Within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'*

Student Accommodation

- 2.2 Paragraph 04 (reference ID 67-004-20190722) of the [Housing Needs of Different Groups Planning Practice Guidance](#) (PPG) published in July 2019 and updated in May 2021 states "Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area."
- 2.3 Paragraph: 025 (reference ID: 68-034-20190722) of the [Housing supply and delivery guidance](#) published in July 2019 and updated in December 2024, allows for student accommodation to contribute towards an authority's housing land supply based upon the amount of accommodation it releases in the wider the wider housing market.

Self-Build and Custom Housebuilding

- 2.4 The [Self-Build and Custom Housing Building Act 2015](#) (as amended by the [Housing and Planning Act 2016](#)) defines Self-build and Custom Housebuilding as *"the building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those*

individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person”.

- 2.5 The Council is required to keep a register of individuals and groups of individuals who are seeking to acquire serviced plots of land in their area to build homes for those individuals to occupy. The Act requires relevant authorities to “*keep a register of a) individuals, and b) associations of individuals, who are seeking to acquire serviced plots of land in the authority’s area for their own self-build and custom housebuilding*”. The requirements of the register are set out in the [Self-build and Custom Housebuilding \(Register\) Regulations 2016](#). The Act also requires relevant authorities to publicise its register.

Elderly persons accommodation

- 2.6 The [Housing for Older and Disabled People](#) PPG explains that ‘Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.’ (Paragraph: 001 ReferenceID: 63-001-20190626).

Gypsy, Traveller and Travelling Showpeople

- 2.7 The [Planning Policy for Traveller Sites](#) was last updated in December 2024. A key update was to the definition of “gypsies and travellers” clarifying that persons of nomadic habit of life, including those with a cultural tradition of nomadism or of living in a caravan are included within the definition. Paragraph 2 states that this document “*is a material consideration in planning decisions*”, whilst paragraph 3 specifies “*that, the Government’s overarching aim is to ensure fair and equal treatment for travellers*”, whilst also respecting the interests of the settled community. To help achieve this, the Government expects local planning authorities to make their own assessment of need and to plan for sites over a reasonable timescale.

Boat dwellers

- 2.8 [The Housing and Planning Act 2016 \(section 124\)](#) creates a duty under section 8 of the [Housing Act 1985](#) to consider the needs of people residing in or resorting to a local authority area with respect to sites for caravans and the mooring of houseboats as part of the periodical review of housing needs. It deletes sections 225 and 226 of the Housing Act 2004.

Boarding School Accommodation

- 2.9 There are no national plans/policies or programmes relating to boarding school accommodation.

Houses in Multiple Occupation

- 2.10** HMO developments are governed under two different aspects- the Housing Act governs the licensing (and Oxford also has additional licensing) and planning legislation governs changes of use. For planning purposes, HMO are categorised differently under the Town and County Planning Use Class Order) to standard residential dwellings (C3), as either a small or large HMO. A large HMO is a dwellinghouse occupied by more than six non-related occupants sharing accommodation that is not separated into self-contained units, and where some domestic facilities (such as bathroom, kitchen or living space) are shared. Large HMO fall into the Sui Generis use-class and require planning permission. A 'small HMO' is the use of a dwelling house by no more than six unrelated occupants who share basic amenities (e.g. kitchen and bathroom). It falls under Use Class C4, and the legislation permits a change of use from a C3-dwellinghouse unless permitted development rights have been revoked. Oxford has an Article 4 Direction that removes these permitted development rights. As such, no change of use to either category of HMO is permitted within Oxford City Council boundaries without acquiring planning permission in advance.
- 2.11** HMO are also required to obtain a licence to operate. The licensing powers and standards are set out in the Housing Act 2004 and The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, and the licensing scheme is run by Oxford City Council. The Housing Act 2004 (and its resulting licensing scheme) is not a piece of planning legislation per se, and rather sits outside of the planning process as it operates.

Regional and Local Plans, Policies and Programmes

Student accommodation needs assessment

- 2.12** The Updated Specialist Housing Needs Assessment (2025, Icení), is a technical report which draws together various bits of data, including the profile of students in the city and the existing student accommodation profile of the two universities, including their future expansion plans. It is the latest report of its kind, updating the [Oxford Student Needs Assessment](#) (2023, Icení). The report considers the local context of Oxford where there is a significantly constrained land supply, with different forms of development competing against one another. It makes some recommendations as to how the relevant policies in the Oxford Local Plan 2036 should evolve. These currently set out where new student accommodation can be located and as well as how many full-time taught course students can live outside of non-university provided accommodation.

Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment

- 2.13** The [Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment](#) (2024, arc⁴) was undertaken on behalf of the city and all district authorities

within Oxfordshire. It sets out the need for these types of accommodation for each authority from 2023/24 until 2041/42 and establishes that Oxford City has a need of 0 for Gypsy and Traveller pitches and Travelling Showperson yards. However, the assessment does recommend that a criteria-based policy is included in any emerging plan for Oxford, as it provides a framework for assessing planning applications for these types of specialist housing. The assessment also clearly expresses that gypsies and travellers have different requirements from travelling showpeople and that this should be reflected in the criteria-based policy.

- 2.14 Paragraph 9.30 of the assessment notes that, *“the analysis of houseboat need would suggest there is additional need for residential moorings across waterways in Oxfordshire although there are complex dynamics relating to households living on waterways and accessibility to moorings. The principal location of residential moorings is in Oxford City.”* Feedback from boat dwellers and stakeholders suggests that a range of 20-50 additional moorings should be made available, *“therefore, the current figure of 41 in the Oxford Local Plan 2036 as an expression of need remains appropriate.”* (No specific needs for boat dwellers were identified in any of the district authorities.)

Specialist and Supported Housing Needs Assessment

- 2.15 Oxfordshire County Council has published a [Specialist and Supported Housing Needs Assessment](#) (2024, Housing LIN), which sets out the need for the various types of specialist and supported housing across Oxfordshire, broken down by district and over the next 10-20 years. This starts with background about the demographic profile and projections for each district. Oxford has a significantly younger age profile than the other districts, with significantly less growth of the elderly population expected. Nevertheless, there is still a need for additional accommodation over the plan period.
- 2.16 The Updated Specialist Housing Needs Assessment (2025, Icenii) involved working with Housing LIN to produce an assessment of need for sheltered/retirement and extra care units based on the capacity-led population projections as detailed in the report. It suggests a slightly higher level of need than indicated in the OCC report above. The assessment identifies a need in Oxford to 2045 of 1,029 additional sheltered/retirement housing (412 social/affordable rent, 102 shared ownership, 515 market). It identifies a need for 322 extra care units (152 social/affordable rent, 24 shared ownership, 152 market). Additionally, the report shows a need for 43 supported housing units for those with learning disabilities and autism; an estimated 121 supported housing units for those with mental health needs; and a short-term need for up to 10 supported housing units for care leavers and unaccompanied asylum seekers.

Oxford Local Plan 2036

Student Accommodation

- 2.17 The [Oxford Local Plan 2036 \(OLP2036\)](#), adopted in June 2020 is the current development plan for the city and sets out agreed planning policies for the city against which decisions are made. Policy H8 seeks to restrict the provision of new student accommodation to

specific locations – either on or adjacent to existing university campus sites; within the city centre or district centre or on a site allocated in the development plan to potentially accommodate student accommodation. This approach was intended to continue into the Local Plan 2040, albeit with some more flexibility, allowing new postgraduate accommodation to be built adjacent to existing postgraduate accommodation.

- 2.18 Policy H9 seeks to restrict the number of full-time taught course students that can live outside of non-university provided accommodation, with separate thresholds set for the University of Oxford and Oxford Brookes University. The intention of the policy is to ensure a balance is struck between providing accommodation for students, but also for all other types of housing needed within the city. The Local Plan 2040 intended to carry forward this policy but with updated thresholds based on the latest data which was included in the [Oxford Student Needs Assessment](#) (2023, Icen).

Self-Build and Custom Housebuilding

- 2.19 Policy H7 in the OLP2036 seeks to help encourage sufficient self-build and custom housebuilding to come forward and to support community-led housing. The policy approach is to set a threshold for self-build plots on residential sites. The policy requires 5% of the site area on residential sites of 50 or more units to be made available as self-build plots. The policy also sets out expectations of what plots should have, including services, and access to the public highway. In addition, the policy requires the use of a legal agreement to ensure that self-build plots that have not sold after 12 months of marketing be built and bought forward in the normal way, in accordance with other policies regarding affordable housing and housing mix.
- 2.20 In July 2022, following public consultation and updated government guidance Oxford City Council adopted a Local Connection Test to the Self-build and Custom Housebuilding Register to help understand the local demand for this type of housing within the city. This connection test splits the Self-build and Custom Housebuilding Register into two parts to provide a differentiation between those people with a local connection to the city (Part A) and those without (Part B).

Elderly persons accommodation

- 2.21 The Oxford Local Plan 2036 Policy H11 is generally supportive of new elderly persons accommodation, and sets criteria to ensure it is appropriately located and provides a suitable living environment. The intention of the Local Plan 2040 was to continue this approach. This was supported by the County Council. It is recognised that, to be viable, specialist housing needs to be of a reasonably large size, so that there are enough rooms to accommodate the on-site staff and facilities. Because of the lack of large sites in Oxford, there are limited opportunities to allocate parts of sites specifically for this use.

Gypsy, Traveller and Travelling Showpeople

- 2.22 Policy H12 is a criteria-based policy which sets out all the requirements to be met for any new pitches for the travelling community, including for travelling showpeople. The [2024 assessment carried out by arc⁴](#) confirmed that this approach could be continued into the new Plan but emphasised that the policy should reflect the differing requirements needed for gypsies and travellers, and travelling showpeople (the latter who need more space for equipment etc.)

Boat Dwellers

- 2.23 Policy H13 is a criteria-based policy which sets out all the requirements to be met for any new residential moorings or if appropriate, temporary visitor moorings. The [2024 assessment carried out by arc⁴](#) confirmed that the findings of the previous Oxford Boat Dwellers Accommodation Needs Assessment (2018) used to inform this policy has not changed and that the demand/ need for 41 new residential moorings in Oxford remains relevant.

Boarding School Accommodation

- 2.24 The Local Plan 2036 didn't include any policies regarding boarding school accommodation.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

- 3.1 The latest [Authority Monitoring Report \(2024/25\)](#) indicates that both universities are currently operating within their respective thresholds for the number of students living outside of university-managed accommodation. The Icen report (2025) does not find evidence to suggest that the current threshold of 6,000 across the two institutions should be changed currently. One application for new academic floorspace was approved during this period which was compliant with Policy H9.

Self-Build and Custom Housebuilding

- 3.2 Oxford City Council has had a Self-build and Custom Housebuilding Register in place since 1 April 2016. Inclusion on the Register does not confer any form of entitlement in terms of the provision of serviced plots. Rather, its purpose is to provide local planning authorities with demand data that they can use to understand and plan for the future need for this type of housing in their area. Authorities may, at their discretion, advise people on the Register of relevant proposals for development. Additionally, authorities are expected to meet the level of need indicated by the Register, by permitting an equal number of serviced plots within the following three years to the number of registrations that are made over the preceding three years. This is a rolling requirement, running from the end of October each year.

- 3.3 Since its introduction in 2016, there have been 141 registrations (140 individuals and 1 group) on the Self-build and Custom Housebuilding Register (compared to 136 as of October 2023). As of January 2026 there are 76 individuals that have provided evidence to demonstrate a local connection to the city and have subsequently been added to Part A of the register (compared to 73 as of October 2023). Analysis of the addresses of those on Part B of the register suggests that a further 6 individuals cite an address on their expression of interest that would suggest a local connection to the city. Whilst these individuals have not provided evidence to demonstrate this local connection it provides a proxy indication of potential demand. The very small increases in each part of the register since 2023 show there has been an apparent decline in interest in recent years compared to years prior to this where the growth in the register each year was significantly greater.
- 3.4 The constrained housing land supply in Oxford together with the limited availability of greenfield sites and the typical nature of residential development sites in Oxford, means that in many developments it is not feasible to accommodate self-build plots. For example, in high density flatted developments, in office to residential conversions, in student accommodation developments (also typically flatted), or in employer-linked developments. The types of sites which tend to be more suitable for self-build plots are the larger sub-urban and typically greenfield sites – of which there are few in Oxford. However, proposals for community led and self-build/custom housing are being supported on appropriate sites. Since the adoption of the current Local Plan (OLP2036) there has been one development proposal that includes the provision of self-build plots. This is St Frideswide Farm (21/01449/FUL), a development of 134 homes, 5 of which are self-build. This development commenced in 2023.

Elderly persons and other supported care

- 3.5 There have been no planning applications for these types of development recently. It is to be expected that these types of development will only come forward sporadically, when a suitable opportunity arises.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

- 3.6 There have been no planning applications for these types of development during the last few years. However, the criteria-based policies within the Oxford Local Plan 2036 ensures that a policy framework is present to ensure that these types of applications can be assessed should they be submitted in the future.

Boarding School Accommodation

- 3.7 There have been several planning applications for boarding school accommodation in recent years. An example includes St Edward's School Oakthorpe House (21/O2481/FUL), a development of 11 student rooms and a one-bed flat. This development commenced in 2022. Additionally, D'Overbroeck's School 472-474 Banbury

Road (22/O2661/FUL), a development of a 4-storey boarding house and 2 semi-detached dwellings. This development commenced in 2023.

Houses in Multiple Occupation

- 3.8 HMO provide a significant amount of accommodation in Oxford, forming an important and valuable contribution to the housing market. For many people, they offer the only available and affordable solution as renting individually or buying a property in Oxford is too expensive.
- 3.9 Oxford City Council maintains a record of licenced HMO in the city, and this provides an up-to-date view of the number of HMO properties registered. The Regulations only permit publication of licences that are in force and prohibit publication of licences pending or expired licences. As the data is real-time, the register can change on a daily basis. Licences are, however, not published until they are issued and are removed once expired. As of the end of October 2023 there were 2,964 active licences on the register.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Student Accommodation

- 4.1 In the short term, very little would change without a new Local Plan. The latest [Authority Monitoring Report \(2024/25\)](#) indicates that both universities are still operating within their respective thresholds set out in Policy H9 which allows up to a certain number of full-time taught undergraduates to live outside of university managed accommodation. The Updated Specialist Housing Needs Assessment (2025, Icen), suggests that the thresholds remain suitable as the Universities are tracking the low growth scenarios as set out in the original assessment, however Icen also do not believe the thresholds should be reduced.

Self-Build and Custom Housebuilding

- 4.2 Without a new local plan, the *Self-build and Custom Housebuilding (Register) Regulations 2016* would still apply and there would be a requirement for the City Council to keep the Self-build and Custom Housebuilding Register. Whilst this would help gauge an idea of the level of demand for Self-build and Custom Housebuilding, without an up-to-date local plan there would be no policy framework and demand for this type of housing may not be met.
- 4.3 With the cost-of-living increases and ongoing affordability issues for housing in Oxford, the loss of a policy that is supportive of this type of housing could result in individuals and organisations seeking to build/ develop this type of housing outside of the city boundary. Therefore, the potential contribution to the overall housing provision that could come through this route would be constrained.

Elderly persons and other supported housing

- 4.4 In the case of other elderly persons accommodation, the current policy approach is to set criteria for where this is suitable and to ensure it is a good living environment. This policy adds clarity in terms of what is expected, smoothing the application process and ensuring high-quality applications. Without the policy approach, there would be less clarity for applicants and those making decisions on planning applications.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

- 4.5 The approach to these types of specialist accommodation in the Local Plan 2036 was to have criteria-based policies, which are aligned to the NPPF. Therefore, very little would change without a new Local Plan as the criteria-based policies for the travelling community and boat dwellers would still apply to any application submitted.

Boarding School Accommodation

- 4.6 The approach to this type of accommodation is to prevent the loss of dwellings, especially with the significant competition for land and sites in Oxford.

Houses in Multiple Occupation

- 4.7 Without a new local plan, the HMO licencing regimes would still apply to existing or new HMO, which would help to ensure the quality of accommodation for all those living in HMO in Oxford. However, the licencing does not control the location or distribution of new HMO. Without an up-to-date planning policy there would be no policy framework to guide necessary supporting infrastructure and amenity considerations such as appropriate parking, cycle parking and bin storage. Importantly, there would also be no mechanism to guide the location and distribution of HMO across the city. With the cost-of-living increases and ongoing affordability issues for housing Oxford, there may be even greater pressures for increased numbers of HMO. Unrestricted, this could put pressure on the supply of family-sized homes, potentially leading to their loss, and could also lead to clustering of HMO. If these are then housing predominantly one group of residents, i.e. young people or students, this can affect the mix and balance of the community, and in some cases lead to a perception of loss of community cohesion and neighbourhood character.

5. Key issues addressed through the Local Plan

Introduction

- 5.1 The analysis set out in the previous sections of this background paper indicates that the Local Plan 2045 will need to take account of varying needs and impacts of specialist accommodation that meets the needs of different groups. Housing is a social need, so it is important to try to provide the right types of housing for those who need it. Specialist housing is not however one size fits all and the accommodation needs of different groups will vary. The policies of the Local Plan can help address the varied needs for different specialist housing types.
- 5.2 The plan assess and responds to the need for specialist housing provision in a number of ways. The Options that were considered at Regulation 19 are shown in Appendix 1 (the policy numbering has changed slightly as two policies were combined, so each is one number lower in the draft submission version of the Plan). The policies presented in the Submission Draft Oxford Local Plan 2045 have not varied in any substantial way from these approaches.

Student Accommodation policy approach

- 5.3 Oxford is a world-renowned brand for educational excellence, principally because of the historic University of Oxford and also due to the highly respected Oxford Brookes University. It is as a result of this reputation that Oxford derives much of its high profile and prosperity.
- 5.4 This success also creates many pressures in the city. Oxford's reputation attracts tourists, language students, publishing businesses, spin-out university enterprises and medical research. The city also has students studying at other institutions, and a number of short-term students who visit the universities and language schools. It means there are significant numbers of students requiring accommodation.
- 5.5 In Oxford at the point of the 2011 Census, there were 29,924 full-time students aged 18 and over. This had increased by 10% in the 2021 Census to a total of 32,888 full-time students. This equates to around 20% of the City's population. In the 2024/25 academic year there were 26,595 students in total at the University of Oxford (compared to 24,510 in 2019 and 27,290 in 21/22) and 21,856 students in total at Oxford Brookes (compared to 16,673 in 2019 and 17,470 in 21/22).
- 5.6 Oxford has several language schools that attract students from all around the world. Courses at these institutions vary from part-time and full-time, from one-off courses to month-long courses and longer. The number of students at these institutions is therefore highly variable and particularly seasonable. The Oxford Student Needs Study (Iceni, 2023) estimated that, based on the 11 language schools assessed, during the peak week of enrolment there were 1,984 students studying languages in Oxford. There are also five

Further Education Colleges. These are institutions that offer any study after secondary education that is not part of higher education (i.e. that is, not taken as part of an undergraduate or graduate degree). Courses range from basic English and Maths to Higher National Diplomas.

- 5.7 Because the majority of language school courses are only a few weeks this means the accommodation need is for temporary accommodation rather than any kind of permanent accommodation. Most of this need is met and will continue to be met through homestays with families and in student accommodation not otherwise in use over the summer months. Many of the further education colleges in Oxford serve the existing residential population, so students more often than not live in existing residential households, either as part of a family unit or independently. Several of the institutions do already have accommodation for students who do have an accommodation need. The Oxford Student Needs Assessment (Iceni, 2025) therefore finds no significant need for additional student accommodation for students at institutions other than the universities over the plan period.

Overall approach to managing the impacts of student housing need

- 5.8 The approach of the Plan is to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts they may have, on established communities and on the housing market.
- 5.9 The demand for student accommodation places two main forms of pressure on the local housing stock:
- students accommodated directly in private rented housing; and
 - from student accommodation being developed on sites that may equally be suitable for other types of housing.
- 5.10 These pressures on the local housing stock act to increase rents, worsening affordability, and also mean that sites that might otherwise deliver onsite affordable housing may come forward for student accommodation that does not deliver any onsite affordable housing. An additional consequence where there is a high proportion of students can be the perceived or actual harmful impacts on the host community or neighbourhood. A concentration of student halls can mean that they dominate an area, meaning a high proportion of transient occupants in an area, and an established community that becomes more fractured and less strong.
- 5.11 A policy approach is needed to manage the pressures of students in the best way, while recognising and responding to the forecast needs of educational institutions that have a housing need (predominantly the universities). There is a balance to be struck between encouraging students into halls because it frees up family housing, and limiting student halls because they take up new sites that could be used for new family housing. Hence, the Local Plan approach is to limit the over-concentration of HMOs, only allow student

accommodation in the most suitable locations and encourage universities to provide accommodation (in these locations) through the thresholds policy.

Linking new academic facilities with the adequate provision of student accommodation (Policy H9)

- 5.12 Policy H9 links new or redeveloped academic accommodation to the delivery of associated residential accommodation. The intention of the policy is to encourage educational institutions to ensure there is sufficient accommodation for their students, and therefore to limit the numbers of students living in general market housing in the city. In the case of the universities, this may be demonstrated if they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements such as teaching and nursing students and post-graduates on research-based courses. This longstanding policy approach is intended to attempt to manage and minimise the pressures of students on the housing market. In particular, the policy approach is designed to balance the needs of the student population as well as local residents.
- 5.13 If the threshold for either university is breached, that university is prevented from gaining planning permission for new academic facilities that create additional capacity for students. There have been and will continue to be applications for facilities where the argument has been made and accepted that the development is unrelated to student numbers and so the thresholds are not relevant.
- 5.14 This policy has operated effectively since the introduction of the 1991-2001 Oxford Local Plan (adopted 1997). That plan recognised that students have particular housing needs and that the institutions have some responsibility for housing their students in purpose-built student accommodation. It recognised that purpose-built student accommodation can have the least impact on the availability of housing to long-term residents of the city. Policies HO26 and HO29 sought to restrict the numbers of students living outside of university accommodation to 4,000 at the University of Oxford and Oxford Brookes respectively. The 2001-2016 Local Plan found lower thresholds to be achievable and also introduced the link to academic accommodation. Policy ED.6 set a threshold for Oxford Brookes of 3,500 up to 2008 and 3,000 after that date. Policy ED.8 set the same threshold for the University of Oxford. The approach was continued in the Core Strategy Policy CS25, which set a threshold of 3,000 for each university, and continued in the Oxford Local Plan 2036, with current thresholds of 1,500 at the University of Oxford and 4,500 at Oxford Brookes (applied to a narrower range of students than previously, that excludes research-based students)
- 5.15 The PPG makes it clear that these caps or restrictions can be considered if other options won't support the needs of the student population and local residents and if there is understanding of the accommodation needs of universities and other higher education establishments (Paragraph: 004 Reference ID: 67-004-20190722). Care has been taken to understand the accommodation needs of the universities when setting the thresholds.

The Oxford Student Needs Assessment (2023, Icení) and the Updated Specialist Housing Needs Evidence (2025, Icení) used various sources of data to understand the current situation. To assess student accommodation needs over the plan period to 2045 they gathered information about what sites are in the pipeline and what the universities' growth plans are, as well as comparing this to historic growth patterns.

- 5.16 The accommodation needs of students vary greatly. Different types of institutions have different needs (as outlined in the background section, many language school students, for example, come for short stays and are often in homestays or student halls that are vacant during the summer). However, even amongst university students, there is a variation in the type of accommodation that is needed. Clearly student halls are not the answer for every student, and there will always be students living out. Some students may already live in or near the city at home, and they do not need accommodation. Some post-graduate students could be studying for many years whilst also working at the university and student halls are not the most suitable accommodation for them. Therefore, the policy focus is on students studying full-time on taught courses (so this excludes post-graduate research students and students on vocational or sandwich courses whilst they are working). Setting the thresholds 5.16 To set thresholds going forward, we need to predict how much student accommodation there will be and how many of the types of students with accommodation needs there will be over the relevant period. The profile of students and student numbers are always evolving. Icení were commissioned to carry out the Student Needs Accommodation Assessment, Icení, 2023 (and Updated Specialist Housing Needs Evidence, Icení, 2025). This looked at the current profile of students and used information from the universities to forecast it going forward. Setting the threshold (and monitoring the policy) requires an understanding of the number of students requiring university accommodation (according to the definition in the policy, which is full-time, taught course students) against the number of students living in university-provided accommodation.
- 5.17 Both universities have predicted a growth in student numbers, which we need to respond to. It is difficult to be certain over the longer term in respect of the future recruitment of students. Factors that can influence this may be within the institutions' control (e.g. fees, facilities, courses offered, maintenance of academic reputation) but are as likely to be outside their influence (e.g. government policy, macro-economic situation). Both universities felt unable to accurately forecast over more than a short timeframe. Therefore, a threshold has only been included in draft Policy H9 to 2033.

Threshold calculation (Policy H9)

- 5.18 The Student Needs Assessment, using information from the University of Oxford, predicts 18,366 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be an additional 809

rooms come forward in this time period, in addition to the 14,407 currently provided. This would leave a shortfall of 3,150 by 2033/4.

- 5.19 The Student Needs Assessment, using information from Oxford Brookes, predicts 10,670 students will require accommodation (meet the criteria of the policy, i.e. full time, taught course students not already living in Oxford or with other exclusions set out in the Appendix of the Submission Draft Oxford Local Plan 2045) in 2033/34, using the low growth scenario. The accommodation assumption is that there will be the same amount as the current situation. During this time period, some of Oxford Brookes's nomination rights on third-party purpose-built accommodation will expire. Oxford Brookes has said they may not renew these nomination rights. However, they also consider that they have enough information from students to know if they are living in this kind of purpose-built accommodation. There is therefore a slightly different wording for Oxford Brookes as compared to the University of Oxford (who have said they do not have this information) about the accommodation that can be considered to be meeting needs against the threshold, to enable this accommodation to be counted. The current amount of supply is 5,576 (including some accommodation with nomination rights that will expire). This would leave a shortfall of 5,576 in 2033/34.
- 5.20 The thresholds in Policy H9 are set at a level that allows for the anticipated growth in students anticipated above, alongside the understanding of supply and pipeline supply of student accommodation. This means that growth is not constrained, but also that care is taken to ensure no new negative impacts from development that enables increases in student numbers, with a need to retain existing accommodation, or fully replace it.
- 5.21 Purpose built student accommodation is not suitable in all locations. The intention of Policy H8 is to ensure student accommodation is prevented in locations which are not suitable or desirable for students to live. The most suitable locations are on existing university sites where there is no conflict with other housing types.
- 5.22 The locational restriction also recognises that it is important to locate student accommodation in a way that avoids unacceptable changes in character and great increases in activity along quieter residential streets. The proposed restriction means that student accommodation can be delivered only on or adjacent to existing campuses and within the city centre and district centres. These locations are particularly suited to absorbing student accommodation and the levels of activity associated with it. Campuses and sites adjacent to them are suitable because everything is on hand for students and they are not affecting an existing residential area. District centres and the city centres are suitable locations because student accommodation is suited to being on the upper floors, for example above retail and also because it means students will be located in accessible locations where public transport is available to key campus sites. Furthermore, the policy will prevent the domination of student accommodation in established residential areas and will help to maintain the quieter residential character and amenity of these streets and prevent complete domination by student accommodation.

Self-build and Custom housebuilding

5.23 To inform the OLP2045 policy, an exercise has been undertaken to establish whether there is an adequate supply of sites with potential to accommodate self-build housing. Table B of the Strategic Housing Land Availability Assessment (2026) sets out those sites which have met the SHLAA criteria and have development potential. Of those sites with development potential, the sites with capacity for at least 100 dwellings, that have not already been built out, or that do not yet have the benefit of a planning permission, have been reviewed for suitability for self-build. Sites that are expected to come forward as either flatted schemes, or as student accommodation or other communal accommodation types, or as employer-linked housing (for example the JR Hospital site) have been excluded as these would not be feasible for self-build plots to be incorporated into a scheme. For sites expected to come forward as mixed-use development, the proportion of the site expected to be developed for residential use has been estimated. The review of the SHLAA sites suggests that there are six sites in the city that could come forward where it would be feasible to include an element of self-build housing. These sites are as follows:

Helaa Ref	Site name	Total site size (hectares)	Proportion anticipated for residential (ha)	Total minimum no. Of dwellings estimated
018	Diamond Place	1.85	1.0 (mixed use and discounting likely student accommodation)	135
0.28a	Kassam Stadium	6.52	3.4ha (Mixed use-discount likely car parking, replacement community facilities and commercial)	240
0.28b	Overflow Car Park at Kassam Stadium	2.29	2.29	100
113	Redbridge Paddock	3.64	3.64	200
289	Sandy Lane Recreation Ground	4.6	4.6 (assuming off-site reprovision of sports facilities)	250

590	Pear Tree Farm	2.03	2.03	111
TOTAL			16.96	

- 5.24 On the basis of the sites listed in the Table above, there is an anticipated 16.96ha for residential development where it could be feasible to incorporate self-build homes into the development. Policy H13 requires that 5% of the housing area of sites with potential for over 100 dwellings should be made available as self-build plots. The table above shows that 0.848ha would be available for self-build plots over the Plan period. Applying a 90 dwellings per hectare assumption, as the sites are predominantly gateway and district centre, would equate to around 77 self-build plots.
- 5.25 In terms of demand, there are 76 individuals on the Self-build and Custom Housebuilding Register that have demonstrated a local connection, so there is adequate supply identified in the table above to meet this demand and also additional potential demand as people are added to the register over the Plan period.

Elderly persons accommodation

- 5.26 Older people (including those who require retirement housing, housing with care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. Nationally, the population is ageing, and whilst Oxford has a younger than average age profile of residents (12% aged 65+ compared to 19.8 in the South East, 2024, ONS), the population of those 65+ in Oxford is expected to grow by around 35.9%-38.7% by 2045 (representing 7,336-7,905 additional people in this age range).
- 5.27 Specialist housing for older people is provided in a range of formats and can include:
- Age-restricted general market housing, generally aimed at those over 55, potentially with some shared amenities but without on-site support or care services;
 - Sheltered housing, typically purpose-built flats with some communal facilities, a warden and some support such as on-site assistance via alarm;
 - Enhanced sheltered housing/assisted living, which will have additional services to enable people to retain independence such as some meals provided;
 - Extra care housing, which has access to medium to high level of care with 24-hour access to support services and registered care staff and meals available; and
 - Residential care/nursing homes, for those with a high level of dependency and which have rooms within a residential building and provide a high level of care for daily living.
- 5.28 The Oxfordshire County Council Specialist Housing Need Assessment 2024 and the Oxford Updated Specialist Housing Needs Evidence (Iceni, 2025) give a recent picture of the need for supported housing in Oxford. There is an anticipated net need for sheltered/retirement housing in Oxford to 2045 of 1,029 units, 515 of which are market and the rest affordable. For extra care housing, the net need to 2045 is 322, with 152 of

those market, and for care homes the need is 570. For market accommodation, it is expected that the market will respond by bringing forward specialist housing types, if there are available sites to bring forward.

- 5.29 Many sites are potentially suitable within the given criteria of Policy H12. Consideration was given to other approaches, such as requiring a certain proportion of sites to provide specialist accommodation, or requiring it as part of the affordable housing provision. However, this kind of accommodation can only feasibly be provided at scale. 135 units is considered roughly what is needed to make it feasible to run, because at that scale there are enough units to support the amount of specialist features, care facilities and servicing (such as cooking, cleaning and laundry) that are needed. This could not be provided as a small proportion of any site in Oxford and will only realistically come forward if a landowner is interested in using the site, or a fairly large portion of one of the larger sites, for this use.
- 5.30 The criteria set out in Policy are intended to ensure accommodation is well designed and located, so it is suitable for residents' needs and does not create traffic implications. It is important it is well designed, with good access to local facilities, and that it is well integrated into a mixed community.
- 5.31 Another aspect of Policy H12 is that existing specialist care accommodation should be protected unless it is to be replaced elsewhere or unless it can be shown that it is surplus to requirements. Given that there is additional need for this accommodation over the plan period, and limited sites where it can be delivered, this is important, and existing sites offer potential for intensification, which may also help to meet needs.

Gypsy, Traveller and Travelling Showpeople, and Boat Dwellers

- 5.32 To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.
- 5.33 To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Boarding School Accommodation

- 5.34 The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sites or

adjacent to them. This approach limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.

Houses in Multiple Occupation

- 5.35 In some areas of the city the concentration of HMO has resulted in changes to the character of the local area and has led to local parking problems and large numbers of transient households. This has been successfully managed by the threshold approach in the current and previous planning policy documents. There is therefore a clear case for continuing our existing threshold-based approach of development management for HMO of all sizes in Oxford. The policy approach therefore sets criteria to manage how and where new HMO are allowed and to restrict HMO numbers where there is already a high concentration of existing HMO.
- 5.36 The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them, yet sets criteria to manage them in a way that prevents over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become a worsening overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.
- 5.37 The Oxford Local Plan 2036 introduced a policy approach allowing new purpose-built HMO, when these had previously not been prevented. This was to acknowledge that HMO do have a role in ensuring a range of housing provision. However, the vast majority of new HMO are traditional conversions. Where purpose-built HMO have been proposed these have been very large, and are generally aimed at students. There is a high risk that this policy approach will be used to circumvent other housing policies, e.g relating to student accommodation location. Therefore, the Oxford Local Plan 2045 does not allow for new purpose-built HMO.

Appendix A: Options considered at Regulation 18

Policy options set 003a (draft policy H9): Houses of Multiple Occupation (HMO)

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

Table 1 - Policy options set 003a: Houses of Multiple Occupation (HMO)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).	This option would slow down the increase in the number of HMOs in specific areas where there are already significant numbers.	This restriction could lead to higher rents if it restricts the availability of private rented accommodation across the city.
Option b Allow new purpose-built HMOs in appropriate	Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly tensions that can occur because issues such as car and bike parking	It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs. It is possible that large purpose-built HMOs will be put forward in locations not suitable for student accommodation, with the

locations, (potentially restricting the size of these in particular areas).	and bin storage can be integral to the scheme rather than retrofitting an existing building. This approach helps to address the unaffordability issues for people living and working across the city, offering another option to those who would struggle to access housing otherwise.	intention that they will house students and act like student accommodation.
Option c Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.	This approach would acknowledge that the character of some areas is already influenced by the presence of HMOs.	It would be difficult to select an area for the concentration. It may lead to difficulties in building and maintaining a strong community, although HMOs do not always mean transient populations.
Option d Do not have any restriction on HMOs.	HMOs can be an important part of the housing market; meeting needs of those who can only afford to share but who wish to live in the city. In that sense it can help contribute to a balanced community.	HMOs can lead to pressures on services and streets for example with more bins and parking pressure. Homes do not always have sufficient amenity space for multiple households. HMOs are often a more short-term solution for people, so can create transient populations.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - various options/combinations (e.g. option a, b, c or d, or a+b, c+b, d+b) High-level screening conclusion? - the options should be subject to detailed appraisal. Screened in for detailed appraisal? - Yes

Rationale: In terms of options, there is no specific national requirement for a policy, though local context supports the inclusion of some sort of locally prescribed approach, the considerations then are how far such a policy goes in requirements and how these are geographically expressed. Options a and c represent alternative ways of addressing HMO proliferation, option a seeks to prevent a concentration anywhere above a threshold of 20% frontage, meanwhile option c instead defines geographically where HMOs would be accepted and where they would not. Option d is to not set any restrictions at all via the Local Plan. Option b could be carried forward on its own, instead relating to allowing new purpose-built HMOs but with restrictions on size, however it could also be combined with one of the other options.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly **criterion 4. Housing Need** in how they impact supply of new housing and deliver upon densification, as well as how they meet the particular needs of people on lower incomes. The options also impact on local amenity and street scene, as well as potentially the demand upon local services/facilities, which most closely matches **criterion 5. Inequalities, criterion 11. Urban design** and **criterion 6 Essential services**. Whilst options a, b and c are all likely to have positive impacts against housing need and inequalities as they serve to allow additional HMOs in varying ways to meet the needs of particular demographics, options b and c have the potential to have negative impacts against criterion 5, 6 and 11 where they could lead to additional harm to local amenity, character of the neighbourhood and additional demand on services locally (which option a seeks to avoid by ensuring the proportion of HMOs does not go above a certain threshold). Option c could lead to significant sustainability impacts particularly in relation to amenity and living environment in the areas that are designated as having no restriction, option d would further increase this impact by expanding the area of effect city-wide. Due to the varying level of sustainability impact arising across the potential options, it is considered justified to scope this option set in for detailed appraisal.

The preferred approach for the Local Plan 2045 policy is to have a local policy that recognises the importance of HMO in Oxford and is supportive of them yet sets criteria to manage them in a way that prevents and over-saturation or dominance of this type of housing within a street. This will help to ensure that there does not become overconcentration of HMO in certain streets/ part of the city which can result in changes to the character of the local area.

The preferred option is **Option A** which will provides an opportunity for this type of housing to come forward to meet needs, in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. Option B relates to purpose-built HMO and is not a preferred option as provision of this type of accommodation reduces potential for delivering housing that meets greater needs (such as social rented housing). There is also potential that under option B large purpose-built HMOs may be put forward with the intention of them housing students, in locations where purpose-built halls of residents would not be permitted. Option D does not set any restrictions at all via the Local Plan and

whilst the lack of any restriction may not make a difference in some areas of the city, there is potential for a significant amount of HMOs to come forward in other areas at the expense of meeting other housing needs. It is for this reason that option D is not a preferred option.

The options set was tested through the Sustainability Appraisal with Option A and C scoring more positive than Option D. Option D scored negatively against SA objective 4 whilst options A and C had some positive and some negative. Option D also scored negatively against SA objective 11, whilst Option A was neutral and Option C potentially could have negative impacts, depending on implementation. Option B, which is an additional element to the policy that could be combined with the others, rather than an alternative approach to them, might have additional positive sustainability impacts, for example for SA objective 5 if it was to be taken forward, however, Option B is not proposed as part of the preferred approach as discussed above.

Policy options set 003b (draft Policy H10): Location of new student accommodation

It is important to acknowledge, support and build on the important economic and educational role of the Universities and other educational institutions, whilst managing potential adverse impacts that a large number of students resident in Oxford may have on established communities and on the availability of general market and affordable housing. The policy options below consider the different types of approaches to locating student accommodation and the potential consequences of each option.

Table 2 - Policy options set 003b: Location of new student accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student	This restricts student accommodation to the locations where it is most suitable both for the students and to avoid potential issues with unneighbourly behaviour. Student accommodation may be particularly suited to these locations, possibly more than	Limiting locations does mean institutions may be less able to meet their needs. Concentrating student accommodations in these areas may mean that district centres and the city centre could be dominated by these accommodation types.

accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.	general market housing, and it should help to achieve the high densities that these locations provide the opportunity for.	
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.	This approach widens the suitable locations for student accommodation and opens more potential sites. However, it still means that students would not be accessing student halls along quieter residential streets.	The definition of arterial roads and when a development is 'on' them needs to be clear (i.e. how much of a setback is acceptable, what if the entrance is on a side road?). However, it may mean that arterial roads change in character and become dominated by student accommodation for long stretches. The character of many arterial roads currently is that of quiet residential streets and student accommodation can be reported as having a negative impact on neighbours in these areas.
Option c Have no locational restriction on student accommodation but a criteria-based policy.	This would maximise the opportunity to meet student accommodation needs.	This approach would not help to address the competition between student accommodation and other housing types, potentially creating an imbalance within communities and drawing student accommodation into unsuitable areas.
Option d Allow new student accommodation only on existing campus	This would significantly reduce competition between student accommodation and other housing types, maximising delivery of other housing types. It would limit	This approach would not allow us to meet the requirements of the NPPF because it would not provide for enough student accommodation to come forward to meet the needs. This would mean a greater number of students

sites and on existing student accommodation sites.	feelings of disruption to communities of student accommodation that are sometimes reported.	in private rented accommodation, limiting its availability on the open market for others
Option e Restrict occupation of new student accommodation to full time students enrolled in courses of one academic year or more (with potential to allow other occupiers outside of term-time if a management plan is agreed).	Full time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. Policy flexibility for outside of term time maximise occupation of the developments.	Part-time students are also likely to have housing requirements and may struggle to find alternative suitable accommodation.
Option f Require a management regime to be agreed with the City Council to ensure the development complies with parking standards that allow only operational and disabled parking, with the developer providing a mechanism to prevent	This supports the policy approach to put downward pressure on parking in the city. The location of new student accommodation will be in sustainable locations with good accessibility to public transport, walking and cycling routes offering a realistic alternative to using a private car.	Will require appropriate monitoring and enforcement and if that is not in place could result in more cars in the city putting parking pressure on adjacent streets.

residents from parking their cars anywhere on the site, (except for disabled residents).		
Option g Do not have any management restrictions on new student accommodation.	Would give opportunity to maximise occupancy if demand dropped from full time students enrolled on courses.	Without proper management of student accommodation all the benefits of providing it for full time students are lost and the universities will have little or no control of meeting their thresholds for student numbers living within their own accommodation.

Initial sustainability appraisal screening of options sets	
Is there only one option or are there various options we could take? - Options a, b, c or d, in combination with Options e, e+f or g High-level screening conclusion? - Some of the options are similar to each other from a sustainability perspective. However, where there are differences, such as between Option a and Option d, there is the potential to have significant sustainability impacts, therefore the options should be subject to detailed appraisal. Screened in for detailed appraisal? - Yes, but only options A, B, C and D Rationale: Options a, b, c and d are all alternatives. Options a, b and d discuss restriction but to differing types of areas, whilst Option c has no geographic component and instead sets criteria. Option e could be taken on its own. It seeks to restrict occupation of new student accommodation to full time students enrolled in courses of at least one academic year or more. Option f could be taken in conjunction with Option e, as it requires a management regime to be agreed which ensures that the development complies with parking standards that only allow operational parking and not	

residential parking. Option g is an alternative to Option e and Option e +f as it proposes not to have any management restrictions on new student accommodation.

The sustainability impacts arising from the various options all relate to similar SA criteria, particularly the impact of this particular type of accommodation on local amenity, which most closely matches **criterion 11. Urban design** (particularly in relation to street scene). The options also contribute to meeting the housing need of a particular community (students) so are relevant to **criterion 4. Local housing needs**. Option b is more negative for local amenity than options a or d because allowing student accommodation along arterial routes, has the potential to significantly change their character. Many of these routes are quieter residential streets which could then become dominated by student accommodation for long stretches, which could have a negative impact on the local community. Option b is slightly more positive for housing as it is less restrictive than options a and c, as it would allow more locations for student accommodation, albeit the positive is a minor one as it is only meeting the needs of one particular group. Option a would score lower than this due to geographical restrictions, these are less restrictive than Option d, which limits student accommodation to existing campus and student accommodation sites. This might result in this type of need not being fully met which would score a minor negative. Ultimately, due to the differences in the likely significant effects on restricting or not restricting the location of student accommodation, we have scoped this in for detailed SA appraisal to fully explore the potential impacts.

Options e, f and g also strongly relate to **criterion 8. traffic and associated air pollution** because they are about managing impacts of students on car parking and the impacts of vehicles on general amenity, because of the increased numbers of residents typically in student accommodation. Options e and e+f would have a minor positive effect on criterion 8 as restricting parking to operational (and disabled) use would reduce the amount of traffic and associated air pollution in the area as students would be using other modes of transport or active travel. Option g would have either a neutral or minor negative impact, depending on implementation. However, Options E, F and G, are not considered necessary for testing through the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach, which is considered to be the area where there could be significant effects that need to be investigated further.

Location of New Student Accommodation – Draft Policy H10

The preferred approach is a combination of **options A, E and F**. Options A, B, C and D were tested through the SA in order to further explore their potential sustainability impacts. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts. Option A is supportive of locating student accommodation in the most suitable places adjacent to existing institutions or student accommodation sites to avoid potential issues with unneighbourly behaviour, and in sustainable locations such as city and district centres. Student accommodation may be particularly suited to these locations, possibly more than general market housing, and it should help to achieve the high

densities that these locations provide the opportunity for, whilst ensuring that other sites that are most suitable for general market and affordable housing can be developed for those purposes. Options E and F ensure that full-time students who qualify for this accommodation will not be then renting houses in the general housing market thus releasing more of Oxford's housing stock for the nonstudent market. It also allows for policy flexibility for outside of term time to maximise occupation of the developments, whilst supporting the policy approach to put downward pressure on parking in the city.

Policy options set 003c (draft policy H11): Ensuring there is enough student accommodation to meet needs

The NPPF (paragraph 63) lists students as a group whose housing needs should be understood and attempted to be met. The PPG also notes that there is a need to plan for sufficient student accommodation and that there is an expectation that options which support both the needs of the student population as well as the local population should be considered. The policy options below detail the different types of approaches.

Table 3 - Policy options set 003c: Ensuring there is enough student accommodation to meet needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set thresholds for university students living outside of university provided accommodation and prevent expansion of academic facilities if the threshold is breached. The details of the threshold will include the level set (which would reflect what is achievable)	This is a long-standing approach which has been successful in ensuring the universities continue to strive to provide accommodation for most of their students and that this is considered in their wider development plans.	This policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. To be fair and reasonable, this must be related to the development and any related growth in students.

and the types of students it applies to (not all). The intention of the policy option is to see the student thresholds reducing in steps over the length of the local plan.		
Option b Only permit new academic facilities (of all types proposed by the universities or other institutions) that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option (b) is linked to option (a).	This could also be applied to all academic developments that create a need for student accommodation, not just the universities. It ensures the institutions act responsibly by only undertaking developments that create new capacity for students if they show how they will be accommodated.	This may be difficult to enforce and monitor and will not necessarily be easy to make a judgement about whether a development will create increased demand for accommodation from students. A lot will depend on the submissions of the institutions, and it will be important the policy makes it clear the level of evidence expected.
Option c Have no policy linking new academic facilities to student accommodation.	This would mean new institutions could be established in Oxford.	This could undermine the long standing and successful policy which ensures the universities continue to provide accommodation for most of their own students.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, a+b, or c

High-level screening conclusion? - The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale:

Option a could be taken on its own - it seeks to set a threshold for (certain types of) university students living outside of university provided accommodation and prevent expansion of academic facilities should the threshold be breached. Option b expands on Option a by only permitting new academic facilities that will facilitate growth in student numbers if it can be demonstrated how the students will be accommodated. Option c is an alternative to option a and option a +b as it proposes not having a policy linking new academic facilities to student accommodation.

In relation to the sustainability impacts of the options, primarily they impact on **criterion 4. Local housing needs** in how the Local Plan meets needs for students, but also how we protect loss of other housing to students and achieve the required balance. Local amenity is also relevant, which most directly relates to **criterion 11. Urban design** and the approach to expanding academic facilities relates to **criterion 12. Economic growth**.

Options a and a+b will have a similar impact on criterion 4 and criterion 12 as this policy approach has the potential to prevent the further development of important academic, research and administrative uses, which are important for economic growth and the health of the local and national economy. This could have a minor negative impact on both of these criteria, although it would also ensure that there is a policy framework in place to ensure that accommodation for other types of housing need is not all lost to student accommodation. Option c suggests not having a policy linking new academic facilities to student accommodation, which may result in new institutions being able to be established in Oxford and would score a minor positive for criterion 12. Equally, Option c would score a minor negative on criterion 11 as there is the potential for current market and affordable housing to be lost to student accommodation, reducing the supply of this much needed housing in Oxford which is already in short supply, and for quieter residential areas to be dominated by student accommodation, which could have a negative impact on the local community. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Linking New Academic Facilities with the Adequate Provision of Student Accommodation – Draft Policy H11

The preferred approach for the Local Plan 2045 is to include a policy which sets thresholds for university students living outside of university provided accommodation and also prevents expansion of academic facilities if the threshold is breached. The thresholds needs to be set at a level which is realistic for each institution, whilst ensuring it is still effective in minimising the number of students who are reliant on living outside of university-provided accommodation so that this housing can be retained for market and and

affordable housing which is a priority for this Plan. Of the three options considered, **Options A and B** in combination is the preferred approach which reflects this balance that needs to be struck.

Policy options set 003d (draft policy H12): Homes for travelling communities

The December 2024 update to the Planning policy for traveller sites made clear that the Government's overarching aim is to ensure fair and equal treatment for travellers, whilst also respecting the interests of the settled community. The policy options below suggest different approaches to how this could be achieved.

Table 4 - Policy options set 003d: Homes for travelling communities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites but have a policy setting out criteria against which to assess any sites that do come forward.	This approach would be flexible to respond to needs that may arise during the plan period, even if none are currently identified.	It is important that criteria are aimed only at ensuring sites provide suitable living accommodation that does not conflict with other policies.
Option b Search for sites to allocate to meet an identified need.	This would ensure any identified needs were met within the city.	There is no justification to do this if no need within the city is identified. It might be that Oxford does not have any sites suitable for this use because of its compact urban character. Could unnecessarily preclude a site from other residential uses.
Option c Do not allocate sites or set out policy criteria – default to national policy	There may be no need to repeat national policy on this topic in the Local Plan. There would already be general policies of the plan that could be applied in these circumstances (for example on Green Belt).	In the event of a site coming forward there would not be any policy to help in the assessment of the impact, and there would be no guidance in the plan to suggest where that might go.

(Planning Policy for traveller sites).		

1031	Initial sustainability appraisal screening of options sets
	Is there only one option or are there various options we could take? - Options a, b and c are all alternative approaches to one another. High-level screening conclusion? - The options are similar to each other from a sustainability perspective Screened in for detailed appraisal? - No Rationale: The three options are alternatives to one another, but Option a and Option c are similar. The former sets out locally based criteria which might be more appropriate to Oxford's context should sites come forward, whilst the latter relies on the criteria set out in national policy. Neither of these options proposes to search for sites, unlike Option b, which would allocate sites to meet an identified need. Primarily relates to criterion 4. Local housing needs (meeting needs for a particular group), but also addresses criterion 6. Services (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact as national policy is relied upon. Option a could also have a neutral impact as it doesn't allocate sites to meet this type of need, but the criteria included in the policy should any sites come forward, are more relevant to the local context of Oxford. Option a would score a minor positive in respect of criterion 6, as ensuring accessibility to local services forms part of the criteria to be met. Option b is potentially a minor positive in helping to meet housing need (criterion 4) (should one be identified) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6). Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Homes for Travelling Communities – Draft Policy H12

To support the travelling community, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward for gypsies and travellers and travelling showpeople, whilst acknowledging that their requirements differ. It is not proposed to allocate specific sites for this kind of housing type as the 2024 assessment does not identify current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford within the plan period.

Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for gypsy and traveller pitches and travelling showpeople yards to be assessed against should they come forward, where all criteria will need to be met, whilst not allocating sites.

Policy options set 003e (draft policy H13): Homes for boat dwellers

Residential boats and their dwellers on both permanent and temporary visitor moorings contribute to the cultural and housing diversity of Oxford and provide a type of accommodation that can be more affordable. There are several policy options below which suggest how this type of housing could be approached.

Table 5 - Policy options set 003e: Homes for boat dwellers

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Do not allocate sites for new moorings but have a policy setting out criteria to assess any sites that do come forward.	Criteria can be developed to ensure that residential moorings have the facilities and services they need to make them safe and suitable homes and to direct them to the types of watercourses where they are suitable.	If proposals for residential moorings do not spontaneously come forward, then identified needs for moorings will not be met; this approach is not proactive in trying to meet this need.
Option b	If a site could be found this site would help to ensure identified needs are met. Current site	This will not necessarily result in delivery of sites if there is no landowner interest. Searches for suitable

Search for a site to allocate for new moorings.	allocation planning policy in Local Plan 2036 SP29 includes a proposal for some new residential moorings.	sites show there are few potential sites in Oxford remaining. Some actions, such as converting visitor moorings to residential, can't be brought forward through the planning system.
Option c Do not allocate sites or set out policy criteria.	None identified	This would result in a lack of clarity and consistency of approach with no planning policy framework by which to assess planning applications.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Options a, b or c are all alternative approaches to each other.

High-level screening conclusion? - The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: All the options are alternatives to each other. Option a proposes not to allocate sites but to have a criteria-based policy should applications come forward. Option b would allocate a site to meet identified need, whilst Option c would not allocate sites or set out policy criteria.

Primarily relates to **criterion 4. Local Housing Need** (meeting needs for a particular group), but also addresses **criterion 6.**

Services (in that the options consider suitability of sites in terms of access to other services). Option c would have a neutral impact although this may depend on implementation, especially should an application for residential mooring be submitted as there is little national policy guidance in respect of moorings, therefore no clarity on how these applications will be assessed could be given. Option a and b are potentially a minor positive in helping to meet housing need (criterion 4) and ensuring accessibility to local services is factored into where this accommodation comes forward (criterion 6) - either through the criteria as in option a or in the

process for allocating the sites as in option b. Overall, it is not considered that there are significant sustainability impacts that would warrant detailed sustainability appraisal.

Homes for Boat Dwellers – Draft Policy H13

To support those people who wish to live on boats, the preferred approach for the Local Plan 2045 is to include a policy that sets out criteria against which to assess any sites that do come forward. It is not proposed to allocate specific sites for this kind of housing type as there is limited potential for additional sites in Oxford because of constraints such as the need to maintain safe navigation of the main river channels and avoiding conflict with the operational requirements of both the Canal and River Trust and Environment Agency.

Of the three options that were considered to be taken forward, **Option A** is the preferred approach. This option provides a framework for applications for residential moorings to be assessed against where all criteria will need to be met, whilst not setting out specifically where these moorings should be located.

Policy options set 003f (draft policy H14): Elderly persons' accommodation and other specialist housing needs

The NPPF (paragraph 63) lists older people (including those who require retirement housing, housing with-care and care homes) and people with disabilities as groups whose housing needs should be understood and attempted to be met. There are a number of potential policy responses that could be considered. There are a wide variety of different housing types to support the elderly and those with additional needs. The need for these housing types is set out in Oxfordshire

Table 6 - Policy options set 003f: Elderly persons' accommodation and other specialist housing needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is supportive of elderly persons' accommodation of all	This approach ensures elderly persons' accommodation is in the right locations to provide the best quality of life for residents, making sure they have good local access to needed facilities	This approach will not necessarily lead to needs being met and may prevent some proposals coming forward.

types, but with criteria to be met that ensures it provides good quality living accommodation, is in accessible locations and is part of a mixed and balanced community.	and that they are not isolated and cut off from the wider community.	
Option b Include a general policy that is supportive of specialist needs accommodation of all types but does not provide additional criteria on quality.	This would maximise the potential for proposals for elderly persons accommodation to come forward.	This would not require elderly persons' accommodation, so wouldn't necessarily result in its delivery. It could result in accommodation coming forward in unsuitable locations where the residents become or feel isolated.
Option c Require a proportion of the affordable housing on large sites to be used to meet specialist housing needs.	There are a range of specialist housing needs in the city, which are expected to increase over time. It is not feasible to require a whole site to be used to meet these needs. This approach provides a potential means of delivering housing to meet these needs. This approach would help deliver mixed and balanced communities and meet the widest range of needs.	This approach would reduce the amount of regular affordable housing provided to meet the needs of those on the housing list, which is the greatest need in Oxford. The need may still be too great to meet without too much harm to other aims, and it will be difficult to set a justifiable threshold for sites if it is not set at a level to meet all needs. It is important it does not over-burden developers and prevent sites coming forward. Ultimately, in Oxford this policy is likely to be ineffective because there are simply not large enough sites available for this approach to be feasible. That is because there is a critical mass of units that are viable to manage. This need may be met on strategic sites just outside the city, or on sites where the developer makes a decision to bring

		forward a scheme wholly of this type of accommodation.
Option d Include a policy that is restrictive of types of elderly persons' or supported accommodation, for example private market flats available to older people but with limited onsite support.	This could prevent an imbalance in the type of elderly persons' accommodation, for example a large amount of expensive private accommodation with minimal care on-site.	An attempt to restrict elderly persons' or supported accommodation of any type generally is unlikely to be justified or beneficial, as some needs will be met by all types of elderly persons' accommodation. This would also limit opportunities to downsize and free up larger homes to the market.
Option e Do not include a policy relating to elderly persons or other supported accommodation	This would allow the market to respond to need spontaneously and without restriction.	It could give rise to a 'land take' of speculative care homes instead of using land for other housing to better meet local needs, it could lead to no new accommodation of this type or it may lead to unsuitable accommodation in unsuitable locations that does not help to address needs.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - the options are standalone options, rather than ones that could be combined.

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: Only one of the options would actively require supported housing; the others are either supportive of it to a greater or lesser degree or would restrict particular types (in order to encourage others). Even the approach that actively requires supported housing could only apply to very few sites in Oxford, so would not have an impact significantly greater than the other options.

PARA summarising the likely sustainability impacts (if any) in relation to the 12 SA criteria

Older Persons and Other Specialist Accommodation – Draft Policy H14

The preferred approach for the Local Plan 2045 is to have a local policy that sets criteria to guide where and how this type of accommodation comes forward. It is not proposed to set any kind of requirement for this housing type. That is because of the lack of opportunity to do so in the city, which lacks sites of a large enough capacity.

Whilst either of the four options, option A, B, C, D or E could be taken forward, the preferred approach is **Options A**. This option is supportive of elderly persons accommodation, but reflects both the fact that there is only a modest need in Oxford, compared to a significant need for other housing types, and that this housing type is likely to come forward in an unpredictable way, in response to a variety of factors that may influence the landowner, rather than being predictable enough to enable an allocation. It also reflects the fact there are no sites large enough for this to come forward as a requirement for part of a site over a certain size.

Policy options set 003g (draft policy H15): Self-build and custom house building options

The NPPF lists people wishing to commission or build their own homes as groups whose housing needs should be understood and attempted to be met. It also states that local planning authorities should seek opportunities through policies and decisions, to support small sites to come forward for self build and custom housebuilding.

There are several policy responses that could be considered.

Table 7 - Policy options set 003g: Self-build and custom house building

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require a proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-	Gives an opportunity for being able to build your own home in a very constrained city. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	The size of site threshold and the proportion of the site would need to be matched to the housing trajectory to check enough plots would come forward through this approach to meet needs (as demonstrated by the self-build register). However, the rate of addition to the self-build register is likely to vary over time and the level of interest in plots is yet

build plots for large sites, for example all sites over 100 dwellings). Set threshold to meet identified need.		to really be tested so it could be that this does not meet needs or provides more plots than the level of interest and creates delays in delivery. Much residential development in the city involves flats to ensure efficient use of land, this type of development is much more complex to package up as self-build plots.
Option b Require a smaller proportion of the overall number of units (or of the site area to be developed for residential use) to be made available as self-build plots for a larger number of smaller sites, for example all sites over 10 dwellings	This approach could give more certainty that sufficient plots will come forward, because it does not depend on large sites being delivered, and large sites are more easily delayed and the delay of one site when the policy only applies to a few would have a greater impact. Therefore, this may give a greater opportunity for those on the self-build register to gain land to develop their own property.	The more land given to self-build housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Marketing of singular self-build flats on multiple sites is likely to be very challenging and unlikely to be practical.
Option c Allow exceptions to the policy where this would not work well (e.g. only flats, student accommodation). Set thresholds to meet identified need.	Such a policy approach ensures that this type of housing is only made available on sites where it would work well.	Sites that would allow exemption would be developed with no self build opportunities.

Option d Include a criteria-based policy which is positive towards but not requiring of self-build	Such a policy approach supports the delivery of other housing beyond self-build and custom build which is where there is the greatest need.	Without a specific policy there is potentially limited scope for people to find self-build plots, or custom housebuilding. This is not compliant with the Government's approach, which requires us to meet the need for self-build and custom housebuilding.
Option e Include in the policy that any self build plots that have been marketed but not sold over a specified time (e.g. 12 months) should be built and brought forward as dwellings in the usual way.	Such a policy approach gives an opportunity for those interested to gain land to develop their own property but acknowledges that if the plots have been marketed yet have not sold then they should be made available for the delivery of non self build housing as this is where there is greater need.	Demand for self_build plots may vary over time and any new additions to the self build register would have reduced opportunities to develop their own properties as these plots would be lost.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? – various combinations (e.g. either a, b, c or a combination of a+b+d or a+d or b+d). High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: The self build register demonstrates that there is local demand to support the NPPF requirement for opportunities to be given for small sites for self build housing to come forward. The local context in Oxford leads to several potential options for how best to formulate a policy. Options a and b represent different levels of scope over which to apply a requirement (applying to either large sites only or sites over a smaller size threshold), whereas option c allows an exception to the prescriptive policy in

circumstances where the provision of self built plots could undermine the delivery of other types of housing. Option d represents a more influential as opposed to prescriptive approach. Option e represents an additional dimension that could be incorporated with both options a and b or alongside option a or b.

Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, **criterion 4. Local Housing Needs** because of how they help to meet needs of different groups in the community. The high land values in Oxford however mean that the provision of self build plots isn't really an affordable housing model/ affordable way to access housing.

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and whilst focusing on larger sites (option a) concentrates delivery, focusing on smaller sites (option b) means that there is more dispersal geographically which could increase delivery times. Potentially option a could have a greater risk of homes not getting finished/ delivered as more smaller sites are likely to come forward than larger ones. Option c would likely have positive impacts. Option d of not having a prescriptive approach would likely be neutral impact. Option e could have either a neutral or more positive impact, more positive if the plots are built out for self build but neutral if they are built out as non-self build. Overall the differences between the likely impacts of the options are not considered to be significantly different, none of the options have major impacts on sustainability.

Self-Build and Custom Housebuilding – Draft Policy H15

To support people wishing to build their own homes, the preferred approach for the Local Plan 2045 is to include a policy that requires self-build/ custom built plots to be made available.

Of the five options, either option or various combinations of these could be taken forward. The preferred approach is a combination of **Options A, C and E** which will provide an opportunity for this type of housing to come forward on sites that are suitable and where

it would work well, yet also ensures that any plots marketed for self build that have not sold after a certain period of time can be made available for other housing as this is where there is a greater need.

Policy options set 005h (draft policy H15): Community-led housing options

The NPPF indicates that local planning authorities should seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing. There are several potential policy responses that could be considered.

Table 8 - Policy options set 003h: Community-led housing

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that is generally supportive of community-led housing but does not have any requirements.	Gives an opportunity for being able to build your own home in a very constrained city, or develop community led housing schemes that could continue to provide more affordable accommodation in perpetuity. We are required to show we are meeting the need for this housing type, and this option allows us to do that.	This approach would actively ensure this housing type comes forward, so would not necessarily result in it being delivered.
Option b Require a proportion of the total site area to be available to groups wishing to develop community-led housing (for example of over 100 dwellings).	Gives a greater opportunity for community-led housing groups, to gain land to develop their own property.	More land given to community-led housing would result in less housing being delivered of other types and tenures. Very complex to achieve on small sites and could risk the viability of developments. Delivering this in combination with any requirement for self and custom housebuilding could lead to a significant decrease in the delivery of other housing types for which there is a greater need, including all tenures of affordable housing.

Option C Do not have a policy that is supportive of community-led housing schemes.	Such a policy approach supports the delivery of other types of housing for which there is greater need.	Without a specific policy there is potentially limited scope for people to join community-led housing schemes.

Initial sustainability appraisal screening of options sets	
Is there only one option or are there various options we could take? - a, or b, or c High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts. Screened in for detailed appraisal? - No Rationale: The local context in Oxford leads to several potential options for how best to formulate a policy. Option a shows general support but would contain no requirement for this housing type, which is probably appropriate given that whether it comes forward would be out of the control of developers. Option b would set a requirement for a certain amount of this housing type on large sites, although it would not be expected that there would be community housing groups necessarily ready to take up opportunities. Option c would have no policy support for this housing type. Considering sustainability impacts of the various options, they would generally all relate to the same SA criteria, criterion 4. Local Housing Needs because of how they help to meet needs of different groups in the community. The high land values in Oxford however mean that community housing isn't necessarily likely to be an affordable housing model/ affordable way to access housing.	

Between the options, the level of sustainability impact is not considered to be significantly different. Homes would still be built and opportunities could be taken to delivery this housing type by community housing groups if they are in a position to. The options would all be likely to have only a neutral effect on criterion 4.

Community led housing – Draft Policy H15

To support community-led housing schemes, the preferred approach for the Local Plan 2045 is to include a policy that supports this type of housing. Of the three options, either option could be taken forward. The preferred option is **Option A** which will provide an opportunity for this type of housing to come forward on sites that are suitable. Although acknowledged that community led housing will not necessarily meet the requirements for self-build or custom build housing, community-led housing has been incorporated within policy H15 rather than a standalone policy, with wording intended to show how it could meet the need for self-build or custom build housing.

Policy options set 003i (draft policy H16): Boarding School Accommodation

There is no national policy or guidance regarding the development of boarding schools. However, the context of Oxford would encourage a policy as Oxford has a very large housing need with significant competition for land and sites. There are several policy options that can address the development of boarding schools.

Table 9 - Policy options set 003i: Boarding School Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that allows this accommodation type in most locations, with some criteria guiding how they come forward.	This still accommodates for expansion of boarding accommodation but sets out a clear criterion which will protect the loss of C3 dwellings.	This approach would likely do little to prevent the competition of this accommodation type with other housing types that meet housing needs.
Option b Include a more restrictive policy that limits the locations where this type of	This restricts boarding school accommodation to the locations where it is most suitable for students and tries to	Boarding schools may find this approach too restrictive if they have significant growth plans.

accommodaion would be permitted, for example to allow it only on existing school sites.	avoid potential issues with surrounding neighbourhoods.	
Option c Do not include a policy relating to boarding school accommodation.	Boarding schools would have no restrictions on developing accommodation to meet their own needs.	This may cause the loss of C3 dwellings or compete with opportunities to delivery C3 dwellings, and may also cause harm to local neighbourhood and character of the area.

Initial sustainability appraisal screening of options sets	
Is there only one option or are there various options we could take? - High-level screening conclusion? - The options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: In terms of options, it would be appropriate to consider having a policy as there is no specific NPPF guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy. There have been several recent planning applications for boarding school accommodation, demonstrating local demand. This type of accommodation is not classed as residential and does not form part of Oxford's housing need. The inclusion of a policy would enable the monitoring of growth and ensure that boarding school accommodation is granted where appropriate and not competing for much needed residential dwellings and development. In terms of sustainability impacts, the different options all score against criterion 4. local housing need and the level of sustainability is unlikely to vary significantly between the options. Option a would have a neutral impact as this policy won't necessarily create or bring forward any new residential homes. Option b would have a neutral impact as it would be permitting limited development but still not bringing forward new residential development (although does the most to avoid competition with it). Option c could potentially have a minor negative impact as without a policy it could reduce sites available for residential development. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option.	

Boarding School Accommodation – Draft Policy H16

The preferred approach for the Local Plan 2045 is to have a local policy that limits the location where this type of accommodation would be permitted to existing campus sites or adjacent to them.

Whilst either of the three options, option A, B, or C could be taken forward, the preferred approach is **Options B**. This option limits the opportunities for boarding accommodation to compete with other housing types that meet housing needs. Because of the restriction to sites within or adjacent to existing school campuses, this limits the potential for impacts on amenity from school students needing to travel or being located in residential areas remote from the school. Other matters of student safety and facilities are guided by separate regulations, and so the policy does not provide criteria to determine applications against, only the locational restriction.

Background paper 004

Title: Employment and Inclusive Economy

This paper addresses jobs (including knowledge-based jobs, jobs for unskilled residents, apprenticeships and jobs to support a diverse economy) and considers how best to use land to support and diversify the economy. It addresses how the Local Plan can best use land to support and diversify the economy while fostering growth in key sectors including science and innovation. It considers how best to support local people and businesses access the training and opportunities they need to enable them to prosper.
Relevant Local Plan 2045 Objective(s): • Maximise the benefits of the city’s strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
Relevant SA Objective(s): 12. To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.
SEA theme(s): Population and material assets.

1. Introduction	4
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	4
National Industrial Strategy: Invest 2035.....	4
Industrial Strategy Zones Action Plan (June 2025)	5
AI Growth Zones.....	5
National Planning Policy Framework (December 2024)	5
Draft NPPF Consultation (December 2025)	6

Planning Practice Guidance (PPG).....	6
Oxford-Cambridge Growth Corridor	7
Oxford Cambridge Pan-Regional Partnership	7
PwC Good Growth Cities Index 2025	7
Fast Growth Cities – 2021 and Beyond – Centre for Cities	8
Oxford Growth Commission: Interim Report (December 2025).....	8
Enterprise Oxfordshire	8
Oxfordshire Leaders Joint Committee (OLJC)	9
Oxfordshire’s Innovation Engine 2023 – Advanced Oxford	9
Oxford City Council – Our Strategy 2024-28	10
Oxford City Council Economic Strategy 2022-32	10
Oxford City Centre Action Plan 2021-2030	11
Oxford Local Plan 2036 (Extant plan)	11
Employment and Skills Plans:.....	12
Development opportunities	12
Oxford Employment Land Needs Assessment (2026).....	13
Employment Land Supply.....	13
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	14
Oxford’s Economy	14
Availability of broadband	15
Employment by type	16
Employment levels	16
Micro, Small and Medium Sized Enterprises (Micro SMEs)	16
Education and skills	17
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	19
Balancing economic uses, housing and supporting infrastructure	20
Affordable Workspaces	22
Economic impacts of the Covid-19 pandemic.....	22

Future role of the city centre, office space and home-based working.....	23
Retention and recruitment of staff	23
5. Key issues addressed through the Local Plan	25
Introduction.....	25
Meeting Employment Needs	25
Making the best use of employment sites.....	28
Location of new employment uses	29
Housing on Employment Sites	30
Warehousing, Storage and Distribution Uses	30
Community Employment and Procurement Plans.....	31
Affordable Workspaces	31
Hotel and Short-stay accommodation	36
Appendix A – Policy options and preferred approaches	38
Policy options set 004a-1:(draft Policy E1) Addressing employment land needs	38
Employment Strategy – Draft Policy E1	38
Policy options set 004a-2 (draft Policy E1): Making the best use of employment sites.....	42
Policy options set 004a-3 (draft Policy E1) - Housing on Employment sites	45
Policy options set 004a-4 (draft Policy E1): Location of New Employment Uses	49
Policy options set 004b (draft Policy E2) Warehousing and Storage Uses	52
Warehousing and Storage Uses – Draft Policy E2.....	55
Policy options set 004c (draft Policy E3): Community Employment and Procurement Plans..	55
Community Employment and Procurement Plans (CEPPs) - Draft Policy E3.....	57
Policy options set 004d (draft Policy E4) – Affordable workspaces.....	58
Affordable workspaces – Draft Policy E4	59
Policy options set 004e-1 (draft Policy E5): New Tourism and Short Stay Accommodation....	60
Policy options set 004e-2 (draft Policy E5): Existing Tourism and Short Stay accommodation	63
Tourism and Short Stay Accommodation – Draft Policy E5	64
004e-1: New Tourism and Short Stay Accommodation.....	64
004e-2: Existing Tourism and Short Stay Accommodation.....	65

1. Introduction

- 1.1 This topic paper focuses on Oxford's economy, employment and the importance of research and development, education and skills. Oxford is recognised as a globally known brand. It has major assets which include two leading universities, and cutting-edge research in areas including bio-tech, data science, quantum technology and robotics. The city is home to diverse international enterprises including BMW Mini, Oxford University Press, Unipart, Centrica, Amey, Nielsen and TripAdvisor among numerous others. The city's economy plays a key role within both a wider regional and national context. Despite this, Oxford's level of unemployment is higher than the national average. Although it is a city renowned for education, disparities in education levels do exist and there are examples of areas where there is a deprivation of skills.
- 1.2 This topic paper provides a brief summary of the relevant national, sub-regional and local plans, policies and programmes that currently exist and are likely to influence change in the future. There is a section on Oxford's economy and its importance to the national economy, which includes some headlines that help to define the economy of the city, its job growth, key and potential emerging sectors. There is also a section on Oxford's existing education facilities. This includes some key indicators identifying the importance of these education facilities to both Oxford and Oxfordshire. As part of an assessment of the current situation some of the key challenges and future trends that impact the local economy are identified. The next section explores what would happen without a new plan and the potential issues that the city would face. The final section provides some conclusions and sets the key issues which the plan addresses, drawing conclusions from the evidence in relation to each of the policy approaches.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Industrial Strategy: Invest 2035

- 2.1 The publication of Invest 2035: the UK's modern industrial strategy, sets out this administration's "commitment to develop a modern, targeted industrial strategy, with the objective of long-term, inclusive, and resilient growth, by spurring investment into all parts of the UK".
- 2.2 The National Industrial Strategy focuses on "stimulating investment and activity in sectors with the highest growth potential". It identifies eight growth-driving sectors to be prioritised across services and manufacturing. These sectors are based on both existing and emerging strengths and are as follows:

- Advanced manufacturing
- Clean energy industries
- Creative industries
- Defence
- Digital and technologies
- Financial services
- Life sciences
- Professional and business services

- 2.3 Oxford and Oxfordshire are home to the majority of these identified growth-driving sectors. Driven by the existing presence of two successful universities, and their close ties to research and industry, there is significant potential for Oxford and Oxfordshire to further develop and deliver these nationally important growth-driving economic sectors.

Industrial Strategy Zones Action Plan (June 2025)

- 2.4 The Industrial Strategy Zones Action Plan sets out twenty-two locations across the UK which aims to create successful places that can deliver their full potential, supported by specific funding initiatives. The Government wants to ensure that these specific locations can seize opportunities and develop industries of the future. It is worth noting, all Industrial Strategy Zones are located outside Oxfordshire, however.

AI Growth Zones

- 2.5 The Government wants to accelerate efforts to build the necessary infrastructure needed to support AI growth. It sees AI Growth Zones as important as their creation will help to unlock investment in these areas by improving access to power and providing planning support. The Government has (to date) announced four AI Growth Zones, the first of which, at Culham in Oxfordshire was announced in April 2025.

National Planning Policy Framework (December 2024)

- 2.6 The NPPF gives a clear steer towards supporting economic growth through planning policies and it is clear significant weight should be placed on the need to support sustainable economic growth and productivity.
- 2.7 The NPPF sets out a requirement for a clear economic vision and strategy, which positively encourages sustainable economic growth having regard to the national industrial strategy and any relevant Local Industrial Strategies and local economic development and regeneration policies. It also sets out that Local Plans should develop policies that help to create the conditions in which businesses can invest, expand and adapt to meet anticipated needs over the Plan period.
- 2.8 The NPPF sets out a key economic objective which requires policies 'to help build a strong, responsive and competitive economy'. This aims to ensure 'that sufficient land of the right

types is available in the right places and at the right time to support growth, innovation and improved productivity.’ Planning policies are also required to ‘create the conditions in which businesses can invest, expand and adapt’ and to positively respond to the ‘need to support economic growth and productivity’.

- 2.9 The NPPF highlights the importance of meeting the specific locational requirements of networks and clusters including the knowledge and data driven sectors, creative or high technology industries. National advice also requires a policy approach that ‘should allow each area to build on its strengths, counter any weaknesses’, and address ‘the challenges of the future’. This is considered particularly important where ‘Britain can be a global leader in driving innovation’ and in ‘areas of productivity’ which should ‘capitalise on their performance and potential.’

Draft NPPF Consultation (December 2025)

- 2.10 In December 2025, the Government announced a consultation on a revised NPPF. While not directly applicable to the Oxford Local Plan 2045, the consultation material highlights some revisions to current national policy, which indicate the likely direction of travel for future development plans.
- 2.11 In relation to the national economic policy position, some of the changes are largely editorial in nature. Notable changes include the introduction of national decision-making policies, and a new policy setting out the specific planning considerations for freight and logistics development, and associated infrastructure.
- 2.12 The consultation material highlights that elements of paragraphs 86 and 87 of the current NPPF are proposed to be redrafted, while notable changes include the expectation for plans to include explicit references to Industrial Strategy Zones, AI Growth Zones and Industrial Strategy itself. Additional text is also proposed to enable flexibility to respond to changing commercial property circumstances, which seek to ensure that site allocations for economic purposes are not overly prescriptive (unless there is a clear and justified rationale for doing so).

Planning Practice Guidance (PPG)

- 2.13 The PPG includes guidance about how local authorities should prepare and maintain an evidence base regarding the economic needs of their area. In working out the business needs for an area, consideration should be given to a range of factors including evidence of market demand; wider market signals relating to economic growth, diversification and innovation; the existing stock of land for employment uses and the recent pattern of employment land supply and losses. It also sets out a method for assessing economic land availability.

Oxford-Cambridge Growth Corridor

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

Oxford Cambridge Pan-Regional Partnership

- 2.15 In January 2023, the previous Government confirmed support for the establishment of an Oxford to Cambridge Pan Regional Partnership following a proposal by leaders from local councils, local enterprise partnerships, the Arc Universities Group and the area's transport body – England's Economic Heartland. However, following an announcement in the Autumn Budget 2024, a decision was made by the new Government not to fund the Oxford to Cambridge Pan-Regional Partnership from 2025-26. The partnership was formally closed in May 2025, and some of its work and assets were transferred to the Cambridgeshire and Peterborough Combined Authority, and England's Economic Heartland (EEH), the geographical extent of which includes several counties including Oxfordshire.

PwC Good Growth Cities Index 2025

- 2.16 PricewaterhouseCoopers (PwC) produce an annual Good Growth for Cities Index. The most recent version of this Index, published in September 2025, which compares 50 UK cities using a number of different metrics. The 2025 edition saw ranked Oxford in nineteenth place, having previously been the top performing city from 2017-2023.
- 2.17 PWC's research indicates that the continuing shift in the public interest from the 2024 edition has resulted in financial priorities less dominant in favour tangible, local and essential concerns such as high streets and shops, skills, housing and transport. Below average comparative scores in the housing and transport indicators are therefore likely to explain Oxford's 2025 ranking. By comparison, Cambridge also had below average comparative scores in the housing and transport indicators, and overall was ranked a couple of places lower the Oxford.
- 2.18 The report showed that cities across the South-West region continued to perform well this year (Bristol Swindon, Exeter and Plymouth all ranked within the top ten). York topped the index in 2025. Scoring highly across high streets, skills and jobs – key indicators of prosperity that the public increasingly values.

Fast Growth Cities – 2021 and Beyond – Centre for Cities

- 2.19 The Fast Growth Cities Report 2021 provided an update to a report from 2016. The cities that make up the Fast Growth Cities group (comprises of Oxford, Cambridge, Milton Keynes, Norwich, Peterborough and Swindon) were considered as some of the most successful and innovative places in the UK. The Fast Growth Cities Report focused on six key areas:
- Labour markets, skills and education;
 - Businesses and growth;
 - High Streets and city centres;
 - Housing and planning;
 - Transport; and
 - The economic impact of the pandemic.
- 2.20 The report recognises that the Fast Growth Cities group contains some of the UK's most successful cities, many of which (including Oxford) have a significant impact beyond their boundaries.

Oxford Growth Commission: Interim Report (December 2025)

- 2.21 Published in December 2025 by the Government on behalf the Oxford Growth Commission, this Interim Report sets out the views of the Chair (Neale Coleman – appointed in May 2025) on how best to unlock and accelerate growth in Oxford and the surrounding area. The Interim Report includes 47 recommendations for central and local partners with a focus on maximising the benefits of growth for the local area, and for the UK as a whole.
- 2.22 The final report, scheduled for Autumn 2026, will set out a series of recommendations to Ministers on priorities and actions to support growth in Oxford and Oxfordshire.

Enterprise Oxfordshire

- 2.23 Oxfordshire's wider economic vision and strategy are contained within several documents produced by the former Local Enterprise Partnership (LEP) for Oxfordshire. The county council (from April 2025), through Enterprise Oxfordshire, is now ultimately responsible for this work and acts as the sole shareholder for Enterprise Oxfordshire.

Prior to the creation of Enterprise Oxfordshire, the Oxfordshire LEP created a range of key economically focused documents including the Strategic Economic Plan (SEP), and its supporting Action Plan, the Local Industrial Strategy (LIS), and Local Investment Plan (LIP). The SEP was first produced in 2014 and was refreshed in 2016. More recently (December 2023) a refreshed SEP was published to help drive productivity, prosperity and wealth for all whilst accelerating Oxfordshire's transition to net-zero.

- 2.24 The SEP aims to champion good, sustainable growth that realises a shared ambition that by 2033, people and communities across Oxfordshire will be benefiting from new

opportunities which are created sustainably through local enterprise and innovation.

- 2.25 The LIS, published in July 2019, described Oxfordshire as a global centre of research and innovation, home to a number of world-leading science and technology companies located across business clusters and hubs, forming a hive of knowledge-intensive economic activity. It describes how cutting-edge products and services are solving challenges in healthcare, mobility, energy and communications, meaning Oxfordshire's success is critical to the UK.
- 2.26 The key sectors and technologies that Oxfordshire excel in have 'global reach', meaning we are a critical driver for UK economic growth. A primary aim of the strategy is to build a global innovation ecosystem in Oxfordshire by 2040. Existing and proposed developments in Oxford are central to this, including the West End.

Oxfordshire Leaders Joint Committee (OLJC)

- 2.27 The joint committee's purpose is to deliver the aims of the Oxfordshire Strategic Vision, adopted by all six councils. The Oxfordshire Strategic Vision aligns with the ambitions of the Strategic Economic Plan (2023) and sets out a set of guiding principles, a set of outcomes to be achieved by 2050, and a definition of "good growth". Taken together, these form an overarching approach to long-term sustainable development in Oxfordshire.
- 2.28 The OLJC consists of all six Oxfordshire authorities and makes several commitments, including to:
- Coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefit.

Oxfordshire's Innovation Engine 2023 – Advanced Oxford

- 2.29 Oxfordshire's Innovation Engine 2023 reassesses the Oxfordshire's Science and technology ecosystem providing an update from the 2013 Innovation Engine Report – Realising the Growth Potential. The report looks forward, but also back over the past decade to see whether the growth potential has been achieved. The report recognises that despite the challenges associated with collecting reliable economic performance data that Oxfordshire appears to have a thriving and diverse innovation ecosystem. It sets out that while the region's knowledge economy has grown, high and medium-tech manufacturing has declined (although this may be more down to a more mature ecosystem).
- 2.30 There is a growing stock of innovation space with many new developments in the pipeline which will add much needed capacity into the system in the next five years. Housing and transport continue to be key challenges and need to be addressed. Other infrastructure needs investment too, particularly data connectivity and supply of power.

2.31 The report makes six recommendations if Oxford's innovation ecosystem is to continue to flourish, strengthen and play a pivotal role in making the UK a beacon for science, technology and innovation:

- Strengthen leadership across the region in relation to innovation;
- The City Council and County Council need to work together to develop a much-needed future-looking transport system which is Oxfordshire wide, not just focused on the city of Oxford;
- Grow and diversify the number of risk capital investors operating within the region;
- Develop a new, clear strategy, with collective buy-in, for inward investment into the region. Different players within the ecosystem need to work together to ensure that Oxfordshire is open, coherent and can respond to potential investors;
- Join up nodes of innovation across the region and help internal and external stakeholders to navigate the landscape through better defined pathways and connectors; and
- Develop a suite of communication tools and assets, tailored to the needs of different audiences, which can be used by all players, to tell Oxfordshire's innovation story.

Oxford City Council – Our Strategy 2024-28

2.32 The Council's corporate plan entitled, Our Strategy 2024-28 sets out five key priorities to support Oxford's ambition to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. One area of focus for the strategy is to support a strong fair economy under which the three priorities for the Council to deliver are as follows:

- Secure, fairly paid, local jobs for Oxford's residents and access to skills and reskilling training
- Using Oxford's unique strengths in a global economy to attract high quality investment
- Supporting development to boost economic activity and deliver benefits for all

Oxford City Council Economic Strategy 2022-32

2.33 Oxford's Economic Strategy seeks to establish a new standard for economic inclusion in the city, underpinned by the strength of an impactful global city, evolving in a way which recognises environmental limits and harnesses the opportunity of a zero-carbon economy. The Economic Strategy highlights Oxford's significant specialisms as:

- Health and Life Sciences; Technology and Digital; Creative Production; Green and Low Carbon; the Visitor Economy; and Social Enterprises and co-operative businesses

- 2.34 Oxford's Economic Strategy recognises that Oxford's economy has a positive global impact and as a hub of education and knowledge, it has a clear purpose to address many of societies' challenges through science and technology. Oxford City plays a key role developing research and incubating early-stage companies. It is one of Oxfordshire's most sustainable locations to locate employment, due to its critical mass, and connectivity to transport and research assets. It recognises Oxford's physical capacity constraints, and the need to deliver commercial floorspace in such a way that does not compromise wider placemaking, zero carbon and green and sustainability objectives.
- 2.35 The City's ambition is to ensure that the anticipated growth is of good quality, in the right location, supported by appropriate infrastructure and contributes to an inclusive economy.

Oxford City Centre Action Plan 2021-2030

- 2.36 The City Centre Action Plan (CCAP) sets out four workstreams, each intended to focus on a different thematic area of work. Each workstream is defined by a series of objectives, under which projects are identified. The four workstreams are:
- Connectivity and access:
 - To be delivered by limiting private vehicles, reducing conflict and congestion and creating spaces for buses, bikes and people;
 - Public realm and animation:
 - To be delivered by improving the public realm and providing events and experiences to animate it and boost dwell times;
 - Getting the mix right:
 - To be delivered by building on Oxford's world-class innovative and creative spirit, enhancing the city centre as a place to live, start and grow a business, visit, and play; and
 - Get the basics right:
 - To be delivered by creating an inclusive, safe, and attractive city centre that mediates and promotes a diverse range of activities and uses.
- 2.37 The City Centre Action Plan also includes a series of objectives under each workstream. Not all of these can be directly influenced by the Local Plan 2040 as some need to be undertaken in partnership with colleagues, for instance, at the County Council.

Oxford Local Plan 2036 (Extant plan)

- 2.38 The policy approach for the city's economy seeks to build on Oxford's strengths and ensure the delivery of prosperity and opportunities for all. Oxford is home to many jobs with particular concentrations in the higher education, research and science sectors. The economic performance of the city is influenced by wider sub-regional and national plans. These include Oxfordshire's Strategic Economic Plan (refreshed in December 2023), the Local Industrial Strategy (2019) together with the Oxford Cambridge Pan Regional

Partnership (confirmed by Government in January 2023) and the Oxfordshire Housing and Growth Deal (2017).

- 2.39 Oxford's employment strategy in the Local Plan 2036 seeks to protect the city's existing network of well-performing employment sites, while supporting the release of poorly performing sites to other uses (including housing). Policy E1 categorises the city's network of employment sites according to their importance to the national and local economy. Category 1 employment sites are the city's most important employment sites supporting the national economy or are significant local employers or sectors. Category 2 employment sites provide local services and facilities, whilst Category 3 are generally smaller, less well-performing sites.
- 2.40 Policy E1 supports the modernisation and intensification of any category of employment site. The modernisation and intensification of any employment site will be supported in principle where it can be shown that the new development makes efficient use of land and does not result in adverse environmental issues. Generally, the approach taken is to resist the loss of employment floorspace at category 1 or 2 sites, but in the case of poorly performing Category 3 sites, a criteria-based approach is taken which, if satisfied, may allow the release of some or all of the site to other uses such as housing.
- 2.41 The Local Plan 2036 also provides policy support for the sustainable growth of the city's two universities - Oxford Brookes University and The University of Oxford. This support allows these institutions to maximise the economic, social and cultural benefits they both bring to the city.
- 2.42 Oxford is also a major centre for teaching hospitals and home to a number of acute and specialist medical research organisations. These medical research organisations link closely with healthcare research undertaken at the two universities. Research and development and teaching uses associated with health and the hospitals is supported in principle given their role as one of Oxford's key sectors. Proposals for new educational, teaching and academic institutions need to show how they support the objectives and wider policies in the Plan.

Employment and Skills Plans:

- 2.43 The Oxford Local Plan 2036 encourages the use of Employment and Skills Plans or Community Employment Plans to help mitigate the impact of development and support an inclusive economy. Employment and Skills Plans seek opportunities including ensuring local people can access job opportunities arising from development at both the construction phase and once development is in operational use.

Development opportunities

- 2.44 There are limited remaining vacant plots at the Oxford Science Park and at ARC Oxford (formerly Oxford Business Park). Both these "Category 1" employment sites have seen

major development recently bringing forward a large amount of employment floorspace supporting Oxford's key strengths. A number of these recent development proposals are now under construction and due to be completed in the short-term. Some of the city's employment sites contain older buildings that are currently in employment uses. These sites cumulatively have significant redevelopment potential for modernisation and/or intensification within the plan period.

- 2.45 Development opportunities are also being realised at Oxford North with a sizeable amount of floorspace being built out under a series of reserved matters planning applications that support an outline granted in 2021. In Autumn 2025, the recently completed Phase 1A was officially opened by Lord Hague of Richmond, Chancellor of the University of Oxford.
- 2.46 The Plan also recognises that significant scope for the redevelopment of brownfield sites exists in Oxford, particularly those in and around the wider West End of the city centre. Such sites include Oxpens, the 'Island Site', Oxford Station, longer-term opportunities at Osney Mead, and the more immediate opportunities involving the transformation of Botley Road Retail Park.

Oxford Employment Land Needs Assessment (2026)

- 2.47 Oxford City Council commissioned Rapleys to undertake an Employment Land Needs Assessment (ELNA) in early 2025. This report looks at the employment land need generated by Oxford city. The study assesses Oxford's economic need in quantitative and qualitative terms. It follows the three prescribed quantitative approaches set out in the PPG – a labour demand approach (drawing on an economic forecast), a labour supply approach (aligning the Standard Method (NPPF, December 2024) housing number with labour and jobs supply), and an assessment of a range of past trends in new floorspace completions and past jobs delivery. The consultants, in producing the ELNA also (as suggested in the PPG), engaged at length with the commercial property market, and this provides a qualitative view of the future needs assessment.
- 2.48 This final version of the ELNA Report builds on the Interim Report, which was published in June 2025 to support the Regulation 18 consultation. It provides relevant updates to the various sections of the Interim report, taking into account the change in base date of the plan period, and sets out conclusions and recommendations based on the findings.

Employment Land Supply

- 2.49 Oxford City Council monitoring data provides a useful context in relation to the changes to the city's economic landscape that have been taking place over the years preceding the start of the plan-period from 2025-2045.
- 2.50 This monitoring data was used to inform the city's Employment Land Needs Assessment (ELNA), which provides a comprehensive supply side assessment of employment land. Table 2.1 (below) provides a summary of Oxford's committed supply. A more detailed analysis is presented in the ELNA.

2.51 Table 2.1 shows total floorspace of committed supply based on the most up-to-date plan monitoring data (as at 31 March 2025), and also includes additional analysis of applications and planning permissions granted as at 17 October 2025).

2.52 The consultants' analysis recognises that while R&D/ lab space is the main form of employment space coming forward in the city, the floorspace under construction (approximately 165,000 sqm of R&D/ lab space) will increase the current office/R&D space available in Oxford by almost 50% (based on VOA (2023) data).

Table 2.1 - showing extant planning permissions involving employment-generating uses. All figures expressed as net increases in sqm (GIA)

Floorspace permitted (sqm GIA)	Office	R&D	Flexible B Class	Light Industrial Uses	General Industrial (B2)	Storage/ Distribution (B8)	Total
	1,877	352,180	2,940	57	-	123	357,177

(Source: Employment Land Needs Assessment, Rapleys, January 2026)

2.53 The ELNA also considered the development pipeline. This analysis included consideration of sites with known developer aspirations, the majority of which have submitted a planning application. The total known net additional floorspace (GIA) at the time the analysis was undertaken was 185.040sqm.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Oxford's Economy

3.1 According to the [Labour Market Profile for Oxford](#), the city was home to 4,915 businesses, collectively employing approximately 126,000 people in 2023. A high proportion of businesses in the city are micro or SMEs (small or medium sized enterprises). In fact, 96.2% of all businesses in Oxford are micro- (less than 9 employees) or small- (10 to 49 employees) businesses ([UK Business Counts, 2025](#)).

3.2 Oxford also has the highest employment rate in the county. The city's importance as an employment location is demonstrated by its job density ratio of 1.19 (2023), which is above the South-East (0.86) and Great Britain (0.86). According to the [City Council's Economic Strategy](#), in 2019 it was estimated that Oxford contributed £6.8bn to the national economy annually.

3.3 The University of Oxford generates more spin-outs than any other university in the country. According to the Oxford University Innovation and University of Oxford [Impact Report 2024 - Shaping the Future: Oxford's Innovation Impact](#), the University has been involved in the creation of more than 300 companies. Research and development, (R&D) is one of the

current growth sectors in Oxford linked directly to the Universities and hospitals. The Covid-19 Pandemic and the ground-breaking research on vaccines with the development of the Oxford AstraZeneca vaccine has helped to highlight Oxford's global importance and its contribution to both the national and local economy. The strong links between healthcare in practice and research are critical.

- 3.4 A Research Report published in 2021 by the Centre for Cities, entitled [Fast Growth Cities – 2021 and beyond](#) showed the importance of a section of fast-growing cities, such as Oxford, and the need to build on their respective strengths as a crucial means of achieving future growth. Innovation systems, such as those established within the city comprise business dynamics, skilled labour and innovative outputs such as patents which together provide the platform for delivering economic growth. The 2021 study confirmed that innovative places, such as Oxford, are likely to be the first places to benefit from the ongoing change in the economy, since they are directly involved in the development of solutions or have the right dynamics to adapt their business models.
- 3.5 Oxford is therefore well placed to help to drive forward national economic growth by supporting the nationally identified growth driving sectors through the ground-breaking research and development undertaken within the city, which benefits from its strong links between the University of Oxford and the hospitals together with key related commercial firms that are established in the city.
- 3.6 In 2023, the importance of "Innovation Hotspots" was highlighted by the Centre for Cities in a report entitled [Innovation hotspots – clustering the new economy](#). Hotspot areas, such as Oxford, involve the clustering of businesses and cutting-edge industries. These areas have been more productive and have grown faster since the financial crisis than those areas that do not benefit from clustering.
- 3.7 The [Labour Market profile for Oxford](#) (produced by Nomis) indicates that the total number of jobs in the city peaked in 2018 at 144,000. Since then, the total number of jobs in Oxford had fallen each year to a low of 127,000 jobs in Oxford in 2021. The number of jobs fell most rapidly between 2019 and 2020, where the number of jobs in the city reduced by 9,000. The most recent figures report a total of 143,000 jobs in Oxford (2023).

Availability of broadband

- 3.8 Oxfordshire County Council's [Digital Infrastructure Programme](#) aims to improve digital infrastructure across the county and their work includes bespoke projects such delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

- 3.9 Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mbps).

Employment by type

- 3.10 Official census and labour market statistics from the Office for National Statistics are provided by Nomis. Nomis provides labour market profiles for local authority areas. Oxford City's labour market profile is available on the [Nomis website](#). The statistics for "Employee jobs" shows a sectoral breakdown of employees in Oxford by Industry. At the time of writing the most recent data is for the year 2024.
- 3.11 This dataset shows a large number of people are employed both in "education" (39,000) and in the "human health and social work" sector (25,000) in Oxford. These two sectors make up 51.7% of all employee jobs in the city. By comparison, these two sectors represent 23.5% of all employee jobs across the South East and 22.8 of all employee jobs nationally. This is significantly more people than are employed in the next two largest sectors. Employee jobs in "wholesale and retail trade; repair of motor vehicles and motorcycles" (9,000) and "professional, scientific and technical activities" (11,000) together account for 16.2% of total employee jobs Oxford, while "information and communication" has dropped from 11,000 in 2023 to 7,000 in 2024.

Employment levels

- 3.12 The Nomis website provides statistics about both employment and unemployment levels within [Oxford's labour market profile](#). At the time of writing the most up-to-date information presented on the Nomis website was for the time-period between July 2024-June 2025. This showed that Oxford's unemployment rate at 4.1% (this is model based due to a small sample size), was slightly higher than the national average of 4%.
- 3.13 The Nomis website also provides information on the number of Jobseekers' Allowance (JSA) claimants. This information is also found within the [Oxford's labour market profile](#). It shows that as of November 2025 there were 3,085 people claiming Job Seeker's Allowance or Universal Credit (UC). This represents 2.6% of the working population. This shows a reduction since March 2021 when there were 5,040 claimants representing 4.3% of the working population (i.e., people aged between 16-64 years old).

Micro, Small and Medium Sized Enterprises (Micro SMEs)

- 3.14 Micro SMEs represent a significant proportion of the city's employment ecosystem. According to [UK Business Count data](#) for Oxford (2024), 96.2% of the city's businesses are micro- (employing up to 9 people – 83.9%) or small- (employing between 10-49 people – 12.3%) businesses.
- 3.15 Recent increased and sustained high-demand for state-of-the-art research and development (R&D) uses including high-value laboratory and office space, has meant that

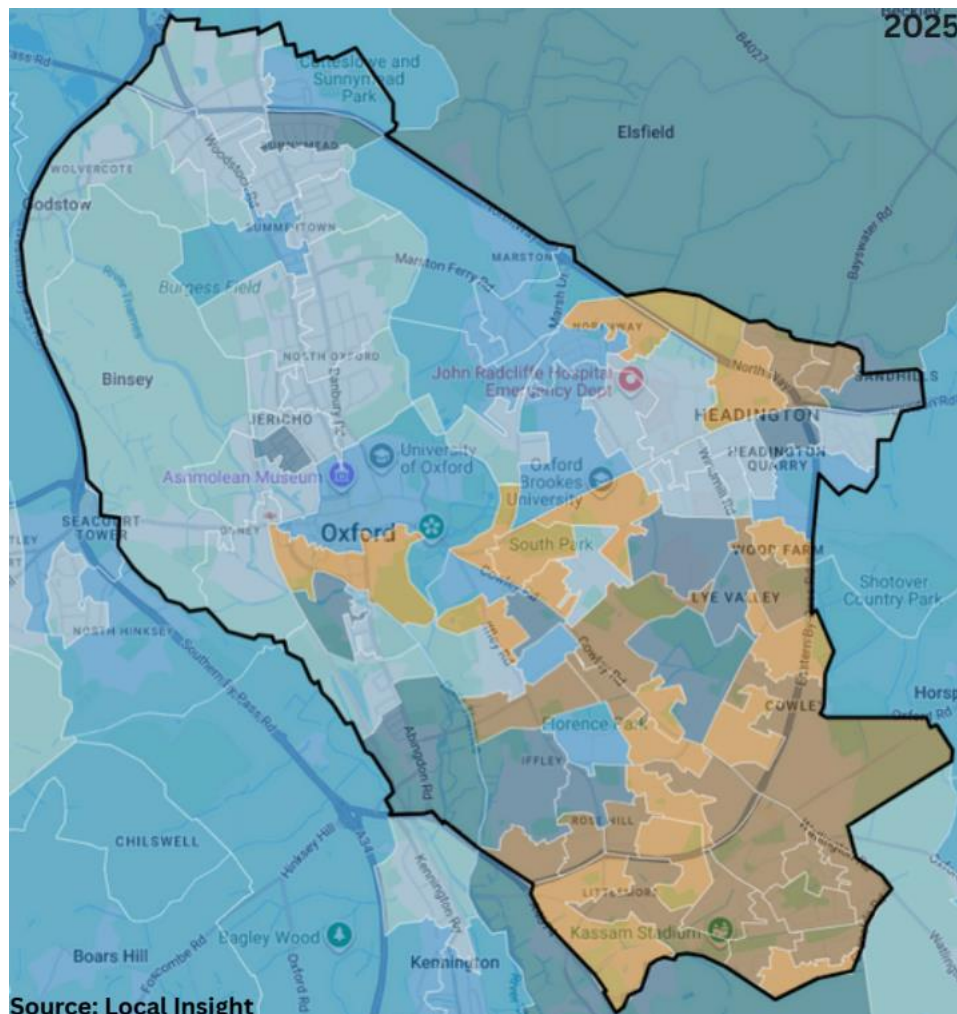
certain Micro SMEs (including social enterprises, creative and co-operative businesses and local start-ups) have experienced increasing difficulties finding or affording suitable workspaces or premises in Oxford.

- 3.16 Where suitable premises for these types of Micro SMEs do exist, they are increasingly coming under pressure for redevelopment, and from rising commercial rents across the city. According to [Advanced Oxford's Innovation Engine Update \(2023\)](#), commercial rents have more than doubled since 2016 when prime office rents were £30/sqft (see Figure 4.1 below for more details). Commercial rent increases are currently being driven by very strong prime laboratory and office markets. According to [Bidwells Oxford Office and Labs Databook](#) (August 2025), prime city centre office rents were reported at £63/sqft in June 2025. While prime rents for larger fitted lab space remained constant at £78.50/sqft. Both prime office and laboratory rents are expected to continue to rise at steadily over the next five years.
- 3.17 The dominant type of employment floorspace being proposed and delivered across the city frequently has a large floorplate, which in combination with the prime commercial rents that can command, excludes many business typologies from accessing it. Opportunities to create new premises to support the growth and development of Micro SMEs more generally in the city are restricted by overall land availability and from pressure to deliver other priority uses (e.g., housing) on any sites that do become available. This lack of suitable and affordable premises and workspaces in the city (both existing and proposed) means that many Micro SMEs are at risk of being priced out of the city.
- 3.18 This is likely to have a negative impact on innovation opportunities, productivity and the overall diversity of jobs in the city. The resulting loss of economic diversity neither benefits the end-users of the high-value, large floorplate uses that are currently dominating provision, nor local people, who many need to travel further (possibly outside of Oxford) to find suitable and affordable premises and workspace.

Education and skills

- 3.19 Oxford can be described as a well-educated city, with a high number of jobs in knowledge-intensive industries attracting workers with higher levels of qualifications. According to the Nomis website, data from the annual population survey (2024), is presented within [Oxford's labour market profile](#). It shows the number of people aged between 16-64 with different levels of qualifications. The highest qualification level on the Nomis website is described as RQF level 4 and above. RQF level 4 is a higher education qualification and, according to the [UCAS website](#), equivalent to the first year of an undergraduate degree, or a Higher National Certificate (HNC). While an RQF level 3 qualification represents A levels or equivalent. The Nomis data shows that 78,100 or 72.9% of Oxford's resident population aged 16-64 has been educated to RQF level 4 and above.

Figure 3.1 - Map showing levels of education and skills deprivation in Lower Super Output Areas of Oxford – (higher deprivation is marked by darker orange, lower deprivation in light blue)



(Source: <https://www.oxford.gov.uk/downloads/file/3851/indices-of-deprivation-2025-oxford-report>)

- 3.20 In 2025, the Government published the latest Indices of Multiple Deprivation. [A detailed report, which discusses Oxford's rankings in the Indices of Multiple Deprivation](#) is available on the City Council Website. This report sets out that since 2015 children and young people's attainment in Oxford has been improving, and Oxford has become relatively less deprived. The city is, however, the most deprived of the five Oxfordshire Districts and has one Lower Layer Super Output Area (LSOA) within the 10% most deprived areas nationally. There are 9 areas in total within the city that fall within the 20 per cent most deprived areas nationally. A further 9 areas within the city fall within the 20 per cent least deprived areas nationally. This inequality affects parts of the city more than others.
- 3.21 The Indices of Multiple Deprivation can be broken down into various categories. The report sets out regarding the Educational Skills and Training Deprivation category - which measures the lack of attainment and skills in the local population - the average score ranking for Oxford was 129 in 2025 compared to 206 in 2019 (the last time the Indices of Deprivation were prepared). This shows Oxford has become relatively more deprived in the Education domain, with 19 LSOA across the city within the 20% most deprived nationally. State

schools across Oxford, particularly in deprived areas, have under-performed compared to regional and national averages.

- 3.22 Further analysis of the Educational Skills and Training indicator (see Figure 3.1) shows it can be broken down into two sub-domains. These two sub-domains are designed to reflect the 'flow' and 'stock' of educational disadvantage within an area respectively. That is, the 'children and young people' sub-domain measures the attainment of qualifications and associated measures ('flow'), while the 'skills' sub-domain measures the lack of qualifications in the resident working-age adult population ('stock'). In 2019 there were 11 areas in the most deprived 10% nationally for Children and Young People educational attainment compared to only 4 for Adult Skills. Conversely, there were 36 areas that fell within the 10 per cent least deprived nationally for Adult Skills in Oxford compared to 16 for educational attainment for Children and Young People.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 In the absence of a new Local Plan, the importance of the role that Oxford plays to the national economy is likely to continue. This is due to the close ties between research and development (in particular, those associated with the University of Oxford and the Hospitals) and the spin-out companies that are generated because of this close relationship. These innovations through research and development are an essential part of Oxford's economy, both locally and nationally. While it is likely that Oxford's key employment sectors (i.e., education and health) would continue to be linked with innovative research and development, the comprehensive redevelopment and regeneration of certain key sites may prove more difficult.
- 4.2 The new Local Plan provides an opportunity to ensure that sites allocated for employment uses make the best use of land and contribute to wider plan objectives such as sustainable travel, zero-carbon and enabling the co-ordinated delivery of infrastructure to help mitigate the impact of development. However, without a new plan, there is less certainty that these objectives would be realised in a timely and co-ordinated manner. As such there is a risk that the growth of the city may be prevented or delayed from realising its full potential.
- 4.3 Given Oxford's global status and international recognition, the city would still be likely to continue to attract direct investment projects. However, external uncertainties created by world events such as the on-going war in Ukraine and the recent introduction of Tariffs by the US, and the impacts of Brexit would be likely to continue to have consequential adverse supply-chain impacts.
- 4.4 Without a new plan in place, it is likely, providing market conditions remain favourable, that demand for significant additional employment floorspace in the city would continue. This

floorspace has been coming forward at pace on numerous sites across the city. Indications are, that the market remains relatively strong, and that supply has not previously, and is not currently, keeping pace with that demand. This mismatch between supply and demand has led to higher rents across the city. With significant demand for floorspace, there is a risk that sites allocated for other uses (e.g., housing) may come under pressure to be developed for employment uses.

- 4.5 There is also a risk that the benefits of economic growth may not be felt by all. For instance, it is less likely that the development of Oxford's economy would be able to deliver benefits to all without policies in the new plan being in place. This is because there could be less opportunity for local people to improve their skills and training. It is also likely that there would be fewer prospects for SMEs and start-ups to find affordable workspace in the city.

Balancing economic uses, housing and supporting infrastructure

- 4.6 Ensuring economic growth is sustainable requires the delivery of sufficient new homes; the timely delivery of effective infrastructure; alongside the creation of new jobs. Striking a balance between delivering new homes and employment floorspace is a key strategic issue. Oxford is a small compact city. According to the City Council website, the [Geography of Oxford statistics](#) page sets out that Oxford has a total area of 46sq km (17.6sq miles). It is well-documented that there is a shortage of land for housing in the city as well strong demand and the associated impacts on affordability. As such, Oxford is one of the most unaffordable places to live in the country. This lack of suitable housing acts as a barrier to further economic growth.
- 4.7 The balance between the demand for housing and employment land has changed since the previous plan was being drafted. Since then, demand for certain types of employment uses have increased and current indications are that this is likely to continue. The current mismatch between employment land supply and demand is helping to maintain high prime rents for lab and office space both inside and outside the city centre.
- 4.8 Commercial rents are predicted to continue to rise, over the coming years. Advanced Oxford's Innovation Engine Report 2023 provided data from key local agents on how rent levels have increased in Oxford since 2016 to 2022 and then forecast future rent levels from 2023-2027. Figure 4.1 shows the change in rent levels (per sqft) comparing prime office rents with science parks and fitted laboratories.
- 4.9 [Bidwells "Oxford Offices and Labs" Databook](#) (August 2025) showed rent rises in the prime office market from the reported £61/sqft in December 2024 to £63/sqft in June 2025. Prime lab rents however, remained constant at £78.50/sqft, showing no change between December 2024 and June 2025.

Figure 4.1 - showing changes in rent levels (per sqft) comparing city centre office with science parks and fitted laboratories

Year	City Centre Office rents	Science Park rents	Fitted Labs rents
2016	£30.00	£27.00	-
2017	£30.00	£30.00	-
2018	£32.00	£32.00	-
2019	£37.50	£35.00	-
2020	£37.50	£35.00	£55.00
2021	£38.50	£45.00	£60.00
2022	£49.50	£55.00	£75.00
2023(f)	£60.00	£55.00	£76.50
2024(f)	£61.08	£55.99	£77.50
2025(f)	£62.48	£57.28	£78.50
2026(f)	£64.17	£58.82	£79.00
2027(f)	£65.97	£60.47	£79.50

Source: [Advanced Oxford Innovation Report 2023](#)

- 4.10 Oxford is currently in a somewhat unusual situation (outside of Central London), where the delivery of certain commercial floorspace typologies appears to be more profitable than other traditionally higher value uses, such as housing. As such maintaining a blanket protection of employment sites may not deliver the required outcome to boost the supply of housing over the course of the plan period. This is because the extant employment strategy (as set out above) seeks to protect the city's existing locally and nationally important employment sites for further employment uses, as it was written within the context that these sites were under threat from loss to other higher value uses. Considering the current future without the new plan, it is likely that employment sites would continue to receive protection. A new plan provides an opportunity to investigate the potential for new policy interventions that reflect the evolving economic context in which we find ourselves.
- 4.11 Employment growth should be appropriately located to take advantage of the city's strengths and help to provide a sustainable distribution of business premises and employment land, to help maintain a range of potential job opportunities throughout the city. Oxford's contribution to the national economy and importance to research and development, e.g., health, makes the city's economy particularly important to protect in these times of on-going uncertainty resulting from wider economic factors including Brexit, the longer-term impacts of Covid-19, and the war in Ukraine.
- 4.12 It may be necessary to safeguard and protect land to deliver sufficient school places; and to control where educational institutions build more student residences, which could result in the loss of land to other non-residential uses.

Affordable Workspaces

- 4.13 As set out above, Micro SMEs represent a significant proportion of the city's employment ecosystem. According to [UK Business Count data](#) for Oxford (2025), 96.2% of the city's businesses are micro- (employing up to 9 people – 83.9%) or small- (employing between 10-49 people – 12.3%) businesses.
- 4.14 Without the Local Plan 2045, any provision of suitable and affordable workspaces and premises for key Micro SME sectors would rely solely on voluntary provision by developers on a site-by-site basis. It is likely that this would result in a continuing erosion of opportunities for certain Micro SMEs to start-up and remain in the city. This could lead to an increase in the number of Micro SMEs at risk of being priced out of Oxford and the associated negative impacts on innovation opportunities, productivity and a reduction in the overall diversity of jobs in the city.
- 4.15 Recognising the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity and helping to create the conditions in which all businesses can prosper is one of the objectives of the Local Plan 2045. This objective supports the council's ambition to enable a strong, fair economy – one of the priorities set out in [Our Strategy 2024-28](#). Oxford's Economic Strategy 2032 recognises the importance of affordable workspaces in supporting creative activity, social enterprise, co-operative businesses and local start-ups. It sets out that the creation of affordable workspace in the city would enable a more diverse employment base and give opportunities for evolving sectors (including creative production, low-carbon, technology and digital) to develop and grow.
- 4.16 The production of the Local Plan 2045 offers the opportunity to consider how the introduction of a policy could support Micro SMEs by enabling the creation and delivery of suitable premises and workspace in the city. The Local Plan 2045 therefore can help to address a failing in the market to deliver suitable premises and/ or workspaces for a significant proportion of the Oxfords' business community.

Economic impacts of the Covid-19 pandemic

- 4.17 The Local Plan 2036 did not anticipate the Covid-19 pandemic. As such it did not contain any directly relevant policies. In the short-term the pandemic affected people's health, well-being and safety. National lockdowns resulted in the closure of schools and Universities and these closures impacted the quality of children and young people's learning experiences.
- 4.18 The longer-term economic outlook for Oxford remains positive with on-going investment in key sectors supporting life sciences and the knowledge economy at a variety of locations, such as Oxford North, the West End and Botley Road, and in the south of the city, including at The Oxford Science Park and ARC Oxford. Now looking to the future, Oxford appears set to continue to deliver on its key economic strengths and ambitions.

- 4.19 However, there are on-going social and economic costs of the pandemic which were presented in research undertaken at [University College London](#) (published in November 2024). This research presented the health implications of long-covid using a financial metric to understand the economic impacts and potential severity of the issue. The researchers calculated the economic burden of long-Covid, was primarily driven by productivity losses, which averaged £931 per patient over the six-month period. As the ONS recognised that around two million people in the UK have long-Covid the costs associated with days lost could potentially add up to £20billion a year.

Future role of the city centre, office space and home-based working

- 4.20 Oxford's city and district centres continue to play an important but evolving role in the city's economy. Encouraging people into the city's network of centres will help to preserve and enhance their vitality and viability. A mix of uses, alongside retail, including employment, community uses, residential and student accommodation is likely to help re-vitalise the city's centres and ensure that these areas are re-energised by activity.
- 4.21 Pressure on city's office stock remains driven by the accelerated growth in science and technology employment. This sector typically takes up more floor space than other sectors – but evidence suggests that the science sector can adapt to all property types. Existing industrial and retail units can be a more flexible and cost-effective solution for a low-cost fit-out. Recent redevelopments along the Botley Road are an example of this where some of the older retail units have been repurposed as flexible lab-enabled office space offering a flexible mix of office and R&D workspaces.
- 4.22 There is also potential for repurposing vacant spaces within the city and district centres. This brings social benefits in terms of increasing activity and footfall within the city and district centres as well as helping to drive innovation and economic growth. This approach may benefit vacant spaces in the city and district centres. In the city centre, regular surveys are undertaken of vacant units. The most recent survey data (2025) showed that out of 377 surveyed units 79 were vacant (20.95%). In 2024, out of 383 surveyed units, 75 were vacant (19.5%). In 2023, out of 383 surveyed units, 77 were vacant (20.1%). Redevelopment opportunities do account for some vacancies however the percentages broadly align with a national post-Covid picture that shows higher city centre vacancy rates than were experienced before the pandemic.

Retention and recruitment of staff

- 4.23 One of the biggest challenges Oxford faces arises from a mismatch between new homes and jobs. The city's growing economy and associated jobs growth in key sectors such as R&D and labs is resulting in an increased pressure on the availability of housing and services (and on Oxford's already constrained transport network). This homes/ jobs mismatch has also led to affordability and housing issues in the city. These issues represent

the concerns most consistently raised by Oxford's businesses in relation to staff retention and recruitment.

- 4.24 As Oxford is one of the most unaffordable cities in the UK, housing affordability issues also result in over-crowding issues and poor health outcomes. Opportunities to build sufficient new homes within Oxford itself to address this mismatch are limited by the city's size (Oxford is only 46sqm/ 17.6sq miles); its natural and heritage assets (including over 1,500 listed buildings); flood plain; and Green Belt (which covers more than a quarter of the city's total area).
- 4.25 The mismatch between homes and jobs has resulted in Oxford having the highest net inflow of commuting workers in the Oxfordshire region. The Office for National Statistics has produced an online visualisation tool for origin-destination data entitled Visualising People Flows available on [the Office for National Statistics website](#). This shows that for the Census 2021, there were 28,342 workers recorded as commuting into Oxford out of a total of 92,047 workers aged 16 and over.
- 4.26 The Census 2021 figures reflect working from home patterns under restrictions imposed by the Covid pandemic. As such, the data does need to be treated with a degree of caution. However, a direct comparison with the Census 2011 data shows a reduction in in-commuting since 2011. The 2011 Census recorded 45,852 workers commuting into Oxford for work out of a total of 88,258 workers living and working in the city. Besides the obvious environmental pressures, commuting generates its own costs which can be significant particularly when they involve long journeys. These are often borne directly by the employee, particularly if they are on temporary or agency-based contracts.
- 4.27 [Oxford City Council's website](#) provides some additional transport statistics from the 2021 Census. This data shows that within Oxford, the most popular mode of transport was active travel (walk or cycle) with 38.8% of commuters choosing this method, while 38.2% of commuters arrived by car or van. This is significantly lower than the 2011 Census figure of 66.8%.
- 4.28 Finding a way to assist employers with recruitment and retention problems can support the Local Plan objectives in three ways: economically (helping productivity of employers and local investment); through housing (including by providing affordable housing); and sustainability (giving people the opportunity to live closer to place for work; through increased energy efficiency measures; and by through the associated reductions in emissions).

5. Key issues addressed through the Local Plan

Introduction

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to employment land as well as sustainable and inclusive economic growth objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.
- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Meeting Employment Needs

- 5.3 The NPPF (December 2024), is clear (e.g., paras 20, 86) that local authorities should seek to meet the objectively assessed needs for their area by setting a clear economic vision and strategy, setting criteria and identifying strategic sites to meet anticipated needs over the plan period.
- 5.4 This section begins by reviewing evidence presented in the ELNA (in particular, in relation to employment need and supply). It then looks at the overall balance, drawing again, on the findings from the ELNA. Moving on to draw conclusions, based on the evidence, about in relation to the plan's employment strategy and how it will deliver the employment needs of the city over the plan-period.

Identified Floorspace Need

- 5.5 The Employment Land Needs Assessment (ELNA) identifies a total employment floorspace need of 412,460sqm for the plan period 2025-2045. In coming to this global floorspace total, the ELNA considered each of the following broad employment land uses:
- Office (Use Class E(g)i)
 - Research & Development/ Laboratory Space (R&D) (Use Class E(g)ii)
 - Industrial (Light and General) (Use Classes E(g)iii and B2)
 - Warehousing (Use Class B8)
- 5.6 In coming to the conclusions for each of the four identified sectors, the ELNA considered a number of scenarios, in accordance with the PPG, which have been compared to determine which is the most appropriate for plan-making purposes both to support economic development in the city and to avoid constraining growth.

5.7 Table 5.1 sets out the floorspace identified in the preferred scenarios as set out in the ELNA. This table presents the findings in relation to each of the four land use categories (as described above).

Table 5.1 - Oxford's employment floorspace need 2025-2045

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Warehousing (sqm)	TOTAL sqm
Identified need	21,370	345,004	0	46,086	412,460

Source: Oxford Employment Land Needs Assessment (January 2026)

Employment land supply (floorspace)

5.8 A summary of Oxford's known employment land supply position is included in this Background Paper at paragraphs 2.47-2.51 (above). It is also documented in more detail in the ELNA itself.

5.9 The employment land supply position (as documented in the ELNA), is based on known floorspace figures from extant commitments, submitted planning applications, and sites with known landowner/developer floorspace ambitions. Table 5.2 (below) sets out the known planning commitments (i.e., extant permissions). These have been separated into four main land use categories.

The ELNA has also considered the additional potential supply/ capacity for the city. This was based on an analysis of current major planning applications for employment land uses and known landowner/developer interest. This analysis uncovered circa 185,000sqm of additional employment floorspace.

Table 5.2 - Planning commitments 2025-2045

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Warehousing (sqm)	TOTAL (sqm)
Extant permissions	1,877	352,180	2,997	123	357,177

Source: Employment Land Needs Assessment (January 2026)

5.10 The ELNA also recognises that there are other sites in Oxford with potential to deliver employment floorspace in the plan period. However, while an awareness of these sites is acknowledged, the ELNA sets out (as at October 2025), that relevant site owners/ developers were yet to quantify the scale of opportunity.

Oxford's Employment Floorspace Balance

5.11 The ELNA also looked at the balance of employment floorspace need and supply, providing observations about how the identified employment need (within the four land use categories), could be met within the plan-period.

5.12 Table 5.3 shows the employment floorspace balance for each of the four land uses categories.

Table 5.3 - Balance of employment floorspace need and supply

	Office (sqm)	R&D (sqm)	Industrial (sqm)	Ware- housing (sqm)	TOTAL (sqm)
Identified need	21,370	345,004	0	46,086	412,460
Planning commitments (supply)	1,877	352,180	2,997	123	35,177
Balance to find (rounded)	19,000	-7,000	0	46,000	55,000
Potential additional supply/ capacity*		185,000			
BALANCE		192,000			

Source: Employment Land Needs Assessment (January 2026)

5.13 The ELNA did not recommend there was a need to identify land for the modest office, industrial and warehousing needs that were identified through each of the preferred scenarios. This is because the ELNA considered that the growth identified within these employment land uses could all be absorbed within Oxford's existing employment portfolio.

5.14 In relation to the considerable identified need for R&D space, the ELNA notes that this can be met from within the committed and potential additional supply/ capacity that has already been promoted to the Council.

Employment land need vs Employment Floorspace need

5.15 Before going on to consider how the plan addresses employment needs, it is worth noting that the phrases "employment land need" and "employment floorspace need" are two different ways in which the objectively assessed needs for employment uses can be expressed. Employment land need expresses the employment floorspace need in terms of land (i.e., hectares), rather than floorspace (i.e., square metres).

5.16 Expressing employment need in terms of floorspace is particularly useful in Oxford as the amount of land available for employment uses is not being increased. Instead, as will be shown below, the employment strategy proposes intensification (i.e., an increased density) of development across the employment site network with a specific focus towards the city's best performing (or "key") employment sites.

How the plan addresses employment land needs

5.17 At the Reg. 18 consultation stage, the preferred approach was selected because, while it sought to meet objectively assessed employment needs, it prioritised the delivery of much-needed housing (for which an unmet need has been identified). The evidence set out in paragraphs 5.5-5.15 (above) demonstrates that Oxford is capable of meeting all identified employment floorspace needs within the plan period. As such, the plan's employment strategy aligns with the overarching strategy (Policy S1) which seeks to prioritise housing.

Making the best use of employment sites

- 5.18 Historically, Oxford has needed to protect its employment sites to prevent their losses to other higher value uses (including housing), even resorting to the introduction of an Article 4 Direction in 2014 (now lapsed) to prevent their loss to housing (through permitted development).
- 5.19 However, as set out above, Oxford now appears to be in an unusual situation (outside of Central London). This is because, currently, delivering certain commercial floorspace typologies appears to be more profitable than other traditionally higher value land uses, including housing.
- 5.20 As set out above, Oxford is capable of meeting all identified employment floorspace needs within the plan period. In fact, additional analysis of the supply position has shown that 87.6% of total supply of employment generating uses as being put forward within the network of Local Plan 2045 Key Employment sites, or within the city and district centres.
- 5.21 Further analysis of planning commitments (only) shows the percentage of employment generating uses proposed at Key Employment sites or located within the city and district centres, rising to 97.9%.

Key Employment Sites

- 5.22 This analysis shows the importance of having a Key Employment Site network within the wider employment site ecosystem. Given its importance, the Key Employment Site network warrants protection to ensure that, should the economic circumstances change during the plan period, the city's most important employment sites are retained to provide support for Oxford's local economy as well as making a continued contribution to the regional and national economy. The Key Employment Site network was established using the methodology included in Background Paper 004a: Key Employment Site Methodology. This process established the designation of 34 Key Employment Sites across the city.
- 5.23 Policy E1: Employment Strategy therefore includes a presumption against the net loss of employment floorspace at Key Employment sites unless it can be fully justified by meeting set criteria that are designed to protect the wider employment use as well ensuring that the number of jobs in employment generating uses are retained.

Key Employment Sites in the city and district centres

- 5.24 Outside the city and district centres, all the qualifying Key Employment Sites warrant protection for the reasons outlined above.
- 5.25 However, within the city and district centres, the extant Oxford Local Plan 2036 offers protection for a range of employment sites. However, analysis of the city centre office

market undertaken as part the ELNA, highlights that some of the office stock is dated, is on small floorplates and is not considered suitable for modern occupier requirements. This alongside permitted development rights within Use Class E, and the need to maintain and encourage the vitality and vibrancy of centres all supports the use of a higher Key Employment Site threshold within the city and district centres.

- 5.26 It is worth noting that there have also been several recent examples where currently protected employment sites including larger sites (i.e., 0.25ha or more) located within the city and district centres have sought increased flexibility in relation to the planning use class of their future occupiers given the wide range of suitable uses (e.g., housing, student accommodation, retail and hotels) all of which are appropriate to the city and district centres. This reinforces the use of a higher protection threshold for Key Employment Sites located within the city and district centres.
- 5.27 Background Paper 004a: Key Employment Sites methodology describes the process by which the site size threshold for city and district centres, was reached.

Location of new employment uses

- 5.28 As set out above, a significant proportion of Oxford's future supply of employment floorspace is being put forward either within the city and district centres, or across the Local Plan 2045 network of Key Employment Sites. However, within the city there are a large number of employment sites (many of them smaller than 0.25ha), on which employment-generating uses already exist (or they are in lawful use for the proposed employment uses class). These sites form part of the wider employment ecosystem, and as such Policy E1 describes these sites as *Existing employment sites not designated as Key Employment Sites*.
- 5.29 These (generally smaller) employment sites often provide small scale local employment opportunities. As these are sites that are considered to be within a lawful use, Policy E1 introduces criteria to support their regeneration for employment generating uses, which include, making better and more intensive use of the site.
- 5.30 The Local Plan 2045 therefore seeks to support, the intensification of existing employment sites across the wider ecosystem, specifically focusing redevelopment opportunities towards the network of Key Employment Sites, and within the city and district centres.
- 5.31 As highlighted in the ELNA, Oxford's modest employment floorspace needs for Office, Industrial and Warehousing uses, can be met within the existing employment portfolio, while the considerable need identified for R&D uses can be met from within the committed and potential supply that has already been promoted to the Council. As such, there is no need for the plan to identify additional land within the city for employment uses.

- 5.32 The employment strategy sits within the plan's overarching strategy, the focus of which is to deliver housing (for which there is an unmet need identified). The employment strategy therefore seeks to focus the location of new employment generating uses to the identified Key Employment Sites, the city and district centres, and existing employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class).
- 5.33 Ensuring that the city maximises housing delivery is therefore crucial (along with the provision of infrastructure) to helping address associated staff recruitment and retention issues highlighted in paragraphs 4.23-4.28 above, including affordability issues and commuting pressures.
- 5.34 The next section considers the additional measures the Local Plan 2045 has incorporated within the employment strategy to support housing delivery.

Housing on Employment Sites

- 5.35 In addition to the locational requirements for new employment generating uses set out in Policy E1, the plan's employment strategy also allows for the complete loss of *employment sites not designated as Key Employment sites*, while supporting their complete loss to housing. In fact, the plan, in recognition of the city's acute housing need, allows for an element of housing delivery across all employment sites in the city. The same objectives exist for all sites. On Key Employment Sites, where housing is proposed that involve a net loss of floorspace, those specific criteria should also be applied.
- 5.36 It is important that the delivery of housing is prioritised within the city boundaries to help to meet the acute shortage. Without the continued delivery of housing in the city, the key sectors of the economy will not be able to continue to contribute to the economy.

Warehousing, Storage and Distribution Uses

- 5.37 Given the limited available land in the city, it is important to make the best and most efficient use of that land. As set out above, the plan's employment strategy focuses new employment generating uses towards the existing employment site ecosystem, specifically the larger named Key Employment Sites.
- 5.38 Large scale warehousing, storage and distribution (B8) uses often have very specific operational requirements, often needing large areas of land in close proximity to key junctions on the strategic road network. It is precisely these operational requirements that dissuade large-scale B8 uses from locating within Oxford. However, small-scale B8 uses, which can be provide useful support for both local and key employers in the city.

- 5.39 As such, Policy E2 recognises the importance of allowing the city's larger Key Employment Sites to bring forward B8 uses, subject to certain criteria being met, which include residential amenity criteria.
- 5.40 Given the premium land values associated with the prime city centre office and R&D market, it is not expected that B8 uses would be sought in these locations. However, the potential for Key Employment Sites located within the city and district centres to bring forward an element of small-scale B8 uses was an important consideration in determining the site size threshold for Key Employment Sites located within the city and district centres. It was considered that sites above the threshold were generally large enough to accommodate an element supporting B8 uses.
- 5.41 This policy would also enable the city to meet its identified floorspace need for B8 uses.

Community Employment and Procurement Plans

- 5.42 As set out above, Oxford's 2025 Indices of Multiple Deprivation ranking for Education and Skills has fallen since 2019, indicating that the long-standing educational disparities across the city are still prevalent.
- 5.43 The introduction of a policy requirement for Community Employment and Procurement Plans for qualifying development proposals would solidify the extant approach, which encourages their submission alongside major planning applications.
- 5.44 This policy will help support a range of opportunities be delivered in the city, including helping to secure training, construction and operational jobs for local residents. This policy also aligns with the City Council's Economic Strategy 2023-32. It would also contribute to wider economic, social and community objectives, and support the city in delivering an 'inclusive economy'.

Affordable Workspaces

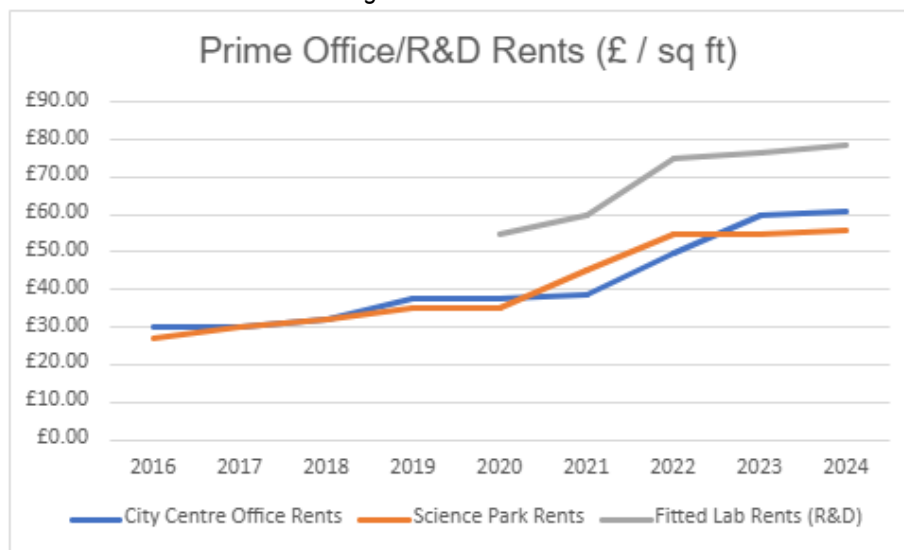
- 5.45 Underpinning the need for affordable workspaces in Oxford are a range of factors which together contribute to the need for intervention. The following factors have been identified through a range of different sources, including the Employment Land Needs Assessment (January 2026), and the Local Plan Viability Assessment (December 2025), the City Council Economic Strategy 2023-32 and the Reg. 18 Background Paper 004: Employment and Inclusive Economy (June 2025). These factors, as set out below, can be summarised as follows:
- Affordability
 - High demand
 - Constrained supply
 - Regeneration pressure

Affordability

5.46 Prime office rents in Oxford have been steadily increasing from between £27-£30 per square foot (sqft) rising in line with predicted (2024) rents to, between £61 per sqft. Figure 5.1 (below) shows the changes to Oxford's Prime Office/ R&D rents between 2016-2024. This data is shown above in Figure 4.1, however, the rents for the forecast years 2023 and 2024 have been supplemented with actual reported rents from Bidwells Oxford Offices & Labs Databook (2024, 2025).

5.47 Figure 5.1 shows a step change in prime city centre and science park rents respectively from 2020 onwards. This shift seems to correlate with the introduction to the market, of fitted laboratory space/ R&D.

Figure 5.1 - Oxford Prime Office/ R&D Rent Changes 2016-2024

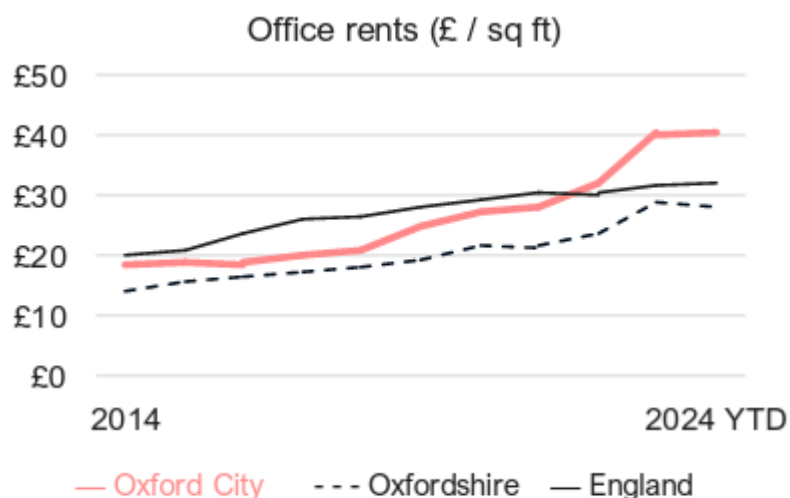


Source: Advanced Oxford (2023) and Bidwells Oxford Offices and Labs Databook (2024, 2025)

5.48 Data from CoStar database for the ten-year period between 2014-2024 (for the 'wider' office market) shows a similar picture post-2020. Average 'wider' office market rents in Oxford (CoStar does not distinguish between office, R&D/ laboratory spaces), seem to rise sharply around 2020. In fact, the data shows that average 'wider' office market rents in Oxford have almost doubled in the period between 2018-2024.

5.49 Figure 5.2 (below) shows the change in average office market rents between 2014-2024 comparing rents achieved in Oxford, with those achieved across the county, and nationally. Office rents in Oxford exceeded the national average in 2022, reaching an average of £40 per sqft in 2023.

Figure 5.2 - Oxford Average Office Market Rent Changes 2014-2024



Source: CoStar (2024)

5.50 The city's industrial/ warehousing market has, however remained static, with the ELNA reporting no new build development for around 25 years. As such, there is likely to be limited evidence of new build prime rents in this sector, which could result in a suppression of rents as they would most likely focus on the secondary market. However, as is set out in the ELNA, static growth in floorspace within these sectors has constrained its supply, which could counteract, to some extent, the impacts of rent suppression.

High demand

5.51 The ELNA notes that when considering the wider office market (i.e., office/ laboratory/ R&D) as a whole, the indications suggest an overall balanced market. However, the qualitative analysis (undertaken through consultation undertaken by the ELNA consultants with local property agents) has highlighted strong demand not only for R&D and lab space, but also for offices (as the market grows into AI).

5.52 The ELNA consultation uncovered that occupiers across the wider officer market (including funders) are looking for high quality space with high levels of sustainability. The demand for office space in the city is from a mix of professional services, servicing the local market, but also those servicing the lab and R&D market, e.g., specialist legal firms. Agents also report strong demand for offices in the city centre.

5.53 The ELNA reports very low vacancy rates within Oxford's industrial/warehousing market. Apart from Osney Mead, the main 'industrial' area is located in the south of the city and comprises of several smaller industrial estates, alongside MINI Plant Oxford and the Unipart site.

- 5.54 While the city's industrial/ warehouse market is small, there is demand for new units. The ELNA recognises that if new units were to be made available, they would likely to be occupied quickly due to the tight nature of the market. However, any new supply that does comes to the market is likely to be focused towards servicing the R&D market.

Constrained supply

- 5.55 While the analysis of the wider office market (as whole) suggests a generally balanced market, the supply-side analysis shows that Oxford's planning commitments are almost exclusively R&D-related. In fact, a large number of planning commitments involve the re-purposing or wholesale redevelopment of older secondary office accommodation to create modern flexible lab/R&D workspaces.
- 5.56 What the boost in supply of R&D masks, however, is a lack of delivery of smaller office spaces some of which are being lost as part of the redevelopment of secondary office space help meet the high demand for R&D in the city. While office space has been previously, and continues to be, lost due to office to residential conversions.
- 5.57 The lack of additional smaller office spaces, and the losses to other uses, means that the existing secondary stock has become more valuable even though most secondary stock (particularly in the city centre) lacks the quality to meet modern occupier requirements.
- 5.58 As set out above, the industrial/ warehouse market has seen very little new stock over the past 25 years. The current lack of planning commitments in the industrial/ warehousing market means that many units are fully let, with limited options for upsizing, this can result in occupiers remaining in premises which can lead to slower business growth.
- 5.59 However, any new future supply of floorspace within these sectors is likely to be high quality flexible space with high sustainability credentials (e.g., Nova, Cowley – a mid-tech building focussed towards servicing the R&D market by providing a flexible space suitable of catering for a range of uses including R&D but with a focus on high-tech, and manufacturing uses).

Regeneration Pressure

- 5.60 The biggest regeneration pressure facing the city's secondary office and industrial/ warehousing stock is through its loss to R&D and associated servicing sectors.
- 5.61 This could lead to further erosion of the city's smaller office stock (as well as through its loss through office to residential conversions). Without suitable replacement, the loss of existing smaller office space could increase the demand for, and value of, the secondary office market, even though much of it lacks quality (particularly in the city centre, where post-Covid, modern occupiers have been seeking smaller, high quality spaces with good sustainability credentials).

- 5.62 Similarly, the industrial/ warehousing market is under pressure, most notably at Osney Mead, for which there is an ambition to convert the industrial estate into an innovation district within the plan period.
- 5.63 Advice in the ELNA is that to mitigate displacement caused by rising rents and to support a balanced economy, the Council should progress its affordable workspace policy.

Benefits of Affordable Workspace

- 5.64 The provision of affordable workspace is important to ensure that individuals, organisations and businesses can access a range of employment spaces at affordable rates and on flexible terms for economic, social and cultural purposes.
- 5.65 Ensuring such spaces are available alongside more traditional employment space can help boost the city's economic strength and diversity. Affordable, accessible workspace provides opportunities to create places of innovation and enterprise that will support the evolution of Oxford's economy, including its social enterprises and priority sectors as they emerge and are identified. In addition to delivering community benefits, such spaces can be key to placemaking from early stages of mixed-use development.

Financial implications of delivering Affordable Workspaces

- 5.66 The Oxford Local Plan Viability Study (December 2025) provides an assessment of the financial implications of delivering affordable workspaces using a variety of employment typologies. This evidence tests two main approaches.
- 5.67 The first considers the viability implications of providing 10% of the floorspace at a variety of discounted rents. The second approach considers the implications of delivering 1,000sqm of floorspace (again, at a various rental discounts). According to the West London Alliance Affordable Workspace Study (June 2021) where (affordable) workspace is delivered that requires an operator to manage it, 1,000sqm is generally considered to be the minimum floorspace required to operate a sustainable business model.
- 5.68 Generally, the study showed that the larger typologies could support a degree of delivery of affordable workspaces. Sites located within the city centre being less impacted than those outside it. Overall, the viability study indicated that the larger typologies (i.e., those sized at 5,000sqm or more) were less impacted by the two main approaches.
- 5.69 As expected, as rent reductions increase, residual land values do fall, but depending on which typology applied to which approach, there are variations in the scale of impact on residential land values.
- 5.70 Overall, the viability testing supports the threshold within the policy and the policy requirement to produce an affordable workspace strategy. The sites listed within the policy

are all those capable of bringing forward larger developments (i.e., a net gain of 5,000sqm GIA or more floorspace) within the viable typologies for employment generating uses.

Delivering affordable workspaces through Policy E4

- 5.71 Policy E4 does not set an a floorspace requirement to be delivered as affordable workspace. Instead, it includes a requirement to produce an affordable workspace strategy and provides details of what to include within said strategy. The supporting text provides that affordable workspaces should be delivered on-site and this is supported by the viability testing.

Hotel and Short-stay accommodation

- 5.72 The Hotel and Short Stay Accommodation Study (2023), shows that Oxford has a good range of hotels and serviced accommodation within the city, noting that there has also been some growth in short-stay accommodation. The study also recognises that there is a need for further hotel accommodation within the plan period.
- 5.73 The study supports the spatial approach to the accommodation of future growth this sector, both in terms of new, and expanded short stay accommodation in Oxford. It clearly articulates support for the locational approach taken within the plan to direct new hotels towards the city and district centres, and the main arterial routes into and out from the city centre. It also sets out support for the approach to existing sites.
- 5.74 The study also highlights that, in some cases there may be some crossover, between the city and district centres/ arterial roads, and Key Employment Sites, such as in Headington and Cowley.
- 5.75 The study also acknowledges that there are likely to be some ‘business aspects of tourism’ resulting from the additional employment floorspace and emerging clusters that are identified in the ELNA. This will help to ensure that any overnight visitors to these businesses would not need to travel.
- 5.76 The study also recommends the use of policy thresholds and accompanying criteria (including viability) in order to protect larger properties. However, the study also reflects on how the sector can support housing delivery further, within the context of its locationally focused policy approach. As such the study recommends an approach whereby smaller premises (i.e., those below the threshold) should be allowed to change their use to residential without the need to undergo a viability assessment.
- 5.77 The study provides a detailed short-term assessment of likely need for future bedspaces and then assumes a longer-term average (post-2030). For the 2025-2045 plan-period this equates to just over 3,800 bedspaces in total (circa 190/year).

Appendix A – Policy options and preferred approaches

Policy options set 004a-1:(draft Policy E1) Addressing employment land needs

1. The city's current employment strategy for meeting identified employment land needs (as set out in the Oxford Local Plan 2036) sought to protect the city's most important existing employment sites and supported the development of additional land for employment uses as part of a mixed-use strategic allocation at the city's northern gateway. Now known as Oxford North, this site is delivering 87,300sqm of commercial floorspace to support the knowledge economy, alongside residential development, at the northern edge of the city. Previous economic evidence showed that Oxford's continued policy of economic restraint was appropriate.
2. Post-pandemic, the city has seen increasing demand for high-value employment floorspace (such as R&D, lab-space and flexible lab-enabled office accommodation). Oxford's employment land supply is in a strong position with a significant amount of high-value, high-demand floorspace permitted in the last five years. The majority of this permitted floorspace is coming forward at pace and likely to be delivered in the early part of the plan period. This strong supply position aligns with the established and escalating demand for this type of floorspace. The employment strategy option set considers several approaches as to how Oxford could address its identified employment land needs for the plan period.

Employment Strategy – Draft Policy E1

3. Draft Policy E1 combines the preferred approaches from four the following four options sets. Each options set considered a discrete element of the policy. The four options sets are as follows:
 - 004a-1: Addressing employment land needs (see table A1.1 conclusions)
 - 004a-2: Making the best use of employment sites (see table A1.2 conclusions)
 - 004a-3: Housing on Employment sites (see table A1.3 conclusions)
 - 004a-4: Location of New Employment Uses (see table A1.4 conclusions)
4. The preferred approach for each option set is set out below and includes a brief commentary about how that particular option was chosen.

Table A1.1 - Policy options set 004a-1: Employment Strategy – how the plan addresses employment land needs

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Attempt to meet employment needs, but prioritise other uses, in particular housing, rather than employment, even if employment needs cannot be met in full within the city, recognising that existing sites in lawful commercial use cannot be changed from that use against the landowner's will, so intensification on those sites is appropriate.	It is not possible to truly 'balance' housing and jobs, because it is not realistic to assume the majority of people will live their lives confined by Oxford's boundaries, there are benefits to an overall approach focusing on allocating new sites for housing and focusing on an approach of intensification and modernisation at existing employment sites (as opposed to allocating new employment sites through the Local Plan) in the city at the current time. This would help reduce problems created by significant in-commuting. Also, employers have reported significant difficulties attracting and retaining staff because of a lack of housing and its expense. To help current employers maintain their success may require a focus on new site allocations for housing and potentially allowing elements of existing employment sites to be converted to housing.	This approach could mean that some employment needs might need to be met outside the city. If this was the case a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.
Option B Focus employment strategy on meeting all identified employment land needs within	Oxford's economy makes an important contribution locally, regionally and	This strategy could result in schemes for employment land being promoted across

Oxford's boundary. Do not seek to prioritise other uses if employment need cannot be met. Actively investigate ways to meet employment land needs within the city through providing appropriately located employment land/ new sites (if required).	nationally, and this approach acknowledges that strength and focuses on it. Meeting our identified employment land needs within the city boundary would mean that there would be no cross-boundary issues for employment land. A wide range of jobs would be supported under this approach. This is because the Plan would actively seek to meet all employment land needs (not just focusing on Oxford's key strengths but This would allow a wide variety of entry points into the labour market, helping to overcome issues such as labour market exclusion, both actual and perceived.	the city. Such schemes could come forward at the expense of other priority uses (e.g., housing). A shortage of housing in the city, and its expense, has been previously reported by employers as one of the key reasons that they have for having difficulties attracting and retaining staff. Depending on the level of need identified, this approach could have adverse impacts on housing delivery, which may have cross-boundary implications requiring a strategy to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs. There are also implications for transport and travel. This option could potentially result in increased in-commuting.
Option C Let the market decide the most appropriate employment land uses to deliver and actively support new locations for employment development if there is market demand for these spaces. Rely on the Framework (NPPF) and other policies in the plan to determine	Oxford's economy makes an important contribution locally, regionally and nationally, and this approach acknowledges these economic strengths and would focus on them by supporting key sectors (such as laboratories/ flexible lab-enabled office accommodation).	This approach could result in schemes for employment land being promoted across the city. There is a risk that schemes could come forward at the expense of other priority uses (e.g., housing). As such, this approach could have potential cross-boundary implications for housing.

applications for employment land in the city.	The office/ lab market is generally considered to be strong and resilient in Oxford. Current market conditions support delivery across the city. A market-led approach would provide flexibility to changing market conditions which could respond quickly and enable other land uses to be delivered (e.g., housing) across the city if market conditions were to change.	It is likely that lower-value, lower density employment-generating land uses (e.g., industrial/ warehousing) would not be able to afford to be in Oxford. As such, these uses may not be brought forward within the city. It is likely that these uses would be delivered outside the city boundary, which may have cross-boundary implications requiring a strategy to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or c

High-level screening conclusion? - Unlikely to have significant sustainability impacts

Screened in for detailed appraisal? No

Rationale: These options have already been considered holistically as part of the wider growth strategy alternatives appraisal. While there are some minor negative effects likely on the SA objective for green spaces resulting from Option B, and potential uncertainties around whether homes or employment land would be delivered resulting from Option C, any likely effects are not considered significant.

Table 004a-1: Addressing employment land needs - conclusions

- The preferred approach for the Local Plan 2045 policy is to take forward **option A**. This is because it was considered important to align the employment strategy with the plan's strategic focus to prioritise housing delivery (which supports the economy by helping to address long-standing barriers to economic growth relating to housing supply and associated affordability issues in

the city). This option would enable employment development to take place on existing sites which would help meet identified employment land need while also supporting the delivery of much needed housing.

Policy options set 004a-2 (draft Policy E1): Making the best use of employment sites

6. Traditionally, Oxford has protected its employment sites to prevent losses to higher value uses. In the past such uses have been residential in nature. More recently, higher value land uses in the city have been related to research and development and the importance of delivery of these uses has been prioritised nationally through incentives and linkages to increases in productivity. Oxford's economic strategy encourages the city to build on its key strengths in life sciences, research and development, while aiming to meet the city's overall employment needs in a way that enables a diverse economy.
7. Given the high demand for high value floorspace in the city, well-performing employment sites that support the city's local economy or provide important local services may come under pressure for redevelopment. Given the permissive changes outlined within Use Class E of the Use Classes order, there may be limited protection that can be afforded to these sites through the planning system. However, there is an opportunity to provide protection for locally important employment sites outside of Use Class E (i.e., those in Use Class B2).

Table A1.2 - Policy options set 004a-2: Making the best use of employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – existing OLP2036 approach Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Protect the city's most important employment sites, which are named in the plan, from loss to other uses.	Continuing to provide protection for the city's most important employment sites is likely to continue to support a focus that aligns with Oxford's key strengths and support the local economy. Has the potential to support the delivery of sustainable transport solutions as intensification opportunities are at known locations.	The continuation of this policy approach could result in a lack of support for the some of the city's Category 3 employment sites. Although poorly performing in economic terms, some of these sites can provide a social value by adding economic variety, diversity and low-cost/ affordable workspaces which can benefit Oxford's economy.

Allow the loss of poorly performing sites to other priority uses e.g., housing).	This approach allows the loss of poorly performing employment sites to other uses (e.g., housing). Supporting housing delivery can help to reduce barriers to economic growth.	
Option B Seek to meet employment land needs through appropriate modernisation and intensification of the city's employment site network. Outside the city and district centres, protect a range of important employment sites that support the local and regional/ national economy. Include criteria-based approach to the loss of employment sites. Take a flexible approach to the continued use of existing employment sites in highly sustainable locations (i.e., city and district centres). Consider inclusion of criteria to support decision-making process.	Continuing to provide protection for the majority of the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This can help maintain a range of employment opportunities are available. Taking a flexible approach to the continued of employment sites in sustainable locations could enable the delivery of other appropriate uses (e.g., housing/ other town centre uses) in some of the city's most sustainable locations.	Not protecting employment sites inside the city and district centres would let the market decide on the most appropriate uses in these locations. This could potentially lead to uncertainty and potential difficulties in planning for and meeting employment land needs in these areas.
Option C Rely solely on national planning policy/ other policies in the plan	This option would provide flexibility for landowners/ developers to respond quickly to market conditions and is likely to support the continued growth of high-value, high-demand uses such as R&D.	Important sites that contribute to the city's economy could be lost as this approach would not actively protect employment sites. The market would ultimately decide on the most appropriate employment uses for the city.

		This could result in more high-value, high-demand employment uses being delivered and would ultimately lead to uncertainty and increased difficulties in planning to meet the city's identified employment land needs.
Option D Protect all employment sites to support meeting identified employment land needs. Do not support the loss of employment uses on any existing employment site. Encourage intensification and modernisation of employment sites across the network.	Continuing to provide protection for the city's network of employment sites is likely to help to ensure a continued diverse network of employment sites remain in the city. This would help to deliver a broader selection of employment sectors than those associated and aligned with Oxford's key strengths.	As all employment sites would benefit from protection under this option, there would be no scope for their loss to other uses other than through permitted development. Including protection for all existing employment sites could result in employment opportunities coming forward on poorly performing or poorly located employment sites which could otherwise be redeveloped for other uses (e.g., housing)

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Options a) - d)

High-level screening conclusion? - the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: No – all options align broadly with national policy. The effects of Option A on the SA Objectives are likely to be broadly neutral as this option takes forward the current Local Plan 2036 approach. Option B, while similar to option A could enable a wider range of uses, including priority uses such as residential development to come forward in sustainable locations such as the city and district centres. This could have minor positive impacts on certain SA objectives (e.g., housing), but would ultimately depend on the implementation of specific sites based on landowner interests. Option C could have minor positive or negative impacts on certain

objectives such as different aspects of economic growth and housing. This option would ultimately lead to the determination of development proposals being guided solely by national policy which may cause increased uncertainty in the decision-making process.

Finally, Option D would broadly strengthen the protection of all employment sites across the city which could have minor negative impacts on housing delivery.

004a-2: Making the best use of employment sites – conclusions

8. The preferred approach for the Local Plan 2045 policy is to take forward **option B**. As set out above, the plan's strategic focus is to prioritise the delivery of housing as it helps to address barriers to economic growth. However, in a compact, constrained city, such as Oxford, with current strong demand for certain employment types, protecting the city's most socially and economically important or "key" employment sites for continued employment use and supporting their appropriate intensification and modernisation forms a key element of the preferred approach. In highly sustainable locations (i.e., the city and district centres), flexibility is important to ensure the on-going viability and vitality of the city's centres. This means that smaller sites in the city and district centres will not be protected for on-going employment uses.

Policy options set 004a-3 (draft Policy E1) - Housing on Employment sites

9. Given Oxford's long-standing housing availability and affordability issues, which have often been cited by employers as key barriers to attracting and retaining staff, we are considering the introduction of a permissive approach to housing delivery across the city's employment site network. Delivering new homes in Oxford is an important aspect of addressing these known barriers to economic growth.
10. It is important to ensure that any approach that supports new homes on existing employment sites does not need lead to situation where it undermines the ability of sites to deliver employment floorspace required to meet the Oxford's identified employment land needs.

Table A1.3 - Policy options set 004-a3 - Housing on Employment sites

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option A – existing OLP2036 approach Does not specifically allow an element of housing delivery on existing employment sites.	If Oxford was unable to meet its identified employment land needs in the city, it would be important to ensure that existing employment sites were not further diversified for other uses.	Not all landowners/ developers of employment sites would necessarily want to bring forward housing on their sites, however some large key institutions representing significant employers in the city (e.g., hospitals – 19.8% of the city’s workforce was employed in the health sector in 2023 according to Nomis). This approach could undermine efforts to house hospital staff on their own sites, which enables the recruitment and retention of key workers, some of whom would otherwise struggle to live in the city.
Option B Allow an element of housing delivery on existing employment sites (if other policy requirements are met (e.g., around flood risk)).	Locating housing and jobs in close proximity to one another can bring benefits for local services and facilities. It also has the potential to deliver more homes within Oxford city. This may help Oxford to meet its housing need and provides flexibility to respond to changing circumstances and values over time (even if owners/ developers are not interested in delivering housing to their sites at the present time). Certain sites, such as Old Road Campus (where important research linked to science and innovation takes place), and	It will be important to ensure that any housing that does come forward on the city’s employment site network does not prejudice Oxford’s ability to meet its identified employment land needs otherwise a strategy for meeting those needs across Oxfordshire would ideally need to be agreed through joint working. If that does not happen, there will not be a strategic approach to meeting those needs. It will be important to ensure that, if housing is allowed to be delivered (through a permissive approach) across the city’s employment site network, that it is not to

	the hospitals (which are important for health care treatment and research), need to be supported to both continue to contribute to the economy, and where appropriate, to investigate opportunities to house key workers who may otherwise struggle to remain in the city.	the detriment of the important contribution that Oxford's economy makes locally, regionally and nationally.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b

High-level screening conclusion? - the options are similar to each other from a sustainability perspective. Unlikely to have significant effects

Screened in for detailed appraisal? - No

Rationale: These options have been assessed within the wider context of the growth strategy alternatives appraisal. They do not require further detailed appraisal as they are only likely to have minor positive or negative neutral or negligible effects.

Option A is likely to have broadly neutral effects on all SA objectives as it would maintain the current Local Plan 2036 policy approach. Option B could have some minor positive effects on SA objectives such as housing and transport-related objectives as supporting additional homes in the city across all employment sites could help to address housing and commuting issues however the amount of new homes that could be delivered would likely depend on implementation as it would not be possible to mandate new homes without landowner agreement.

Table 004a-3 Housing on Employment Sites - conclusions

- The preferred approach for the Local Plan 2045 policy is to take forward **option B**. This option aligns with the plan's strategic focus to prioritise housing. The preferred approach recognises the importance of housing delivery but also the value that existing businesses and sites bring to the city. As such, housing proposed on the city's network of key employment sites must not undermine the continued operation or integrity of successful businesses and employment sites. The preferred approach includes wording to that effect.

Policy options set 004a-4 (draft Policy E1): Location of New Employment Uses

12. Given Oxford's limited land availability and the importance of delivering other priority uses in the city (in particular, housing), it is important to ensure that new employment uses are supported in appropriate locations across the city.
13. There are a number of areas of the city where business and innovation sectors are clustered. These sites play an important role individually, and collectively they contribute to economic growth nationally, regionally and to the local economy. These include the Oxford Science Park; ARC Oxford (formerly Business Park); Old Road Campus; the Hospital sites; Oxford Science Area and Keble Road; the Radcliffe Observatory Quarter; Oxford North (which is now being built out); and the West End regeneration area.

Table A1.4 - Policy option set 004a-4: Location of New Employment Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Support new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. Do not allow any new employment-generating uses outside of these locations (i.e., do not allow the loss of existing housing sites to employment-generating outside the city and district centres). Allow new employment uses in the city and district centres (subject to their role and function).	This option would retain the geographic focus of locating new employment-generating uses in existing centres and specified employment locations. Continuing to focus new employment-generating uses in existing employment locations can bring connectivity and infrastructure benefits. Restricting new employment-generating uses to existing employment sites can support housing delivery in the city by limiting pressure to bring forward housing sites for high-value, high demand employment uses (e.g., R&D)	This approach would continue to support employment-generating uses within existing sites only. This could result in more development being pushed towards the southern edge of the city which includes the locally important Garsington Road cluster as well as key city employers such as the Science Park, ARC Business Park, Unipart site and Mini Plant Oxford. While significant strides have been made towards re-opening the Cowley Branch Line to passenger trains, this area is currently poorly served by public transport, and active travel routes. If by restricting the locations where new employment-generating uses are

		acceptable in the city, this results in constraints to its future supply, this could increase the demand for high-value employment uses. This could result in pressure to redevelop lower-value employment sites to try and keep up with the demand for higher value uses.
Option B As Option A (above) but rather than restricting new employment-generating uses to existing sites, instead allow new employment uses, in a limited number of suitable specified locations (e.g., adjacent to exiting employment sites) Depending on the location, there may be merit in requiring certain sites to bring forward a mixed-use expansion including residential).	As above except this approach would enable key clusters to expand and continue to support Oxford in building on its economic strengths. If Oxford is unable to meet identified employment land needs in the city, this approach may provide a pragmatic way forward which could help support the delivery of additional housing and employment land.	Given Oxford's small size and limited opportunities for new development, actively supporting the creation of additional employment land in the city could negatively impact the delivery of other uses including housing and much-needed affordable housing.
Option C Rely solely on national policy and other policies in the plan (e.g. hierarchy of centres) to determine proposals for new employment floorspace in the city.	Recent changes to the NPPF strengthen support for economic growth and specifically mention laboratories as a key sector to stimulate the economy. This market-driven option is likely to support the delivery of high-value, high demand uses (e.g., R&D/ lab). This is an important sector, which would support national economic objectives.	Outside of the city and district centres, where Class E employment uses would be supported as "town centre uses", the plan would not provide any policy guidance on the location of new employment-generating uses. As a small, compact and constrained city, although Oxford is an inherently sustainable location for development and there could be increased pressure to deliver employment-generating uses in the city. However, this increased

		pressure would be likely to be limited to unallocated sites that would need to comply with national policy. An absence of local policy in this instance could potentially increase uncertainty over where new employment uses could be delivered, if the strength of the commercial market was to soften in relation to the housing market over the plan period.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or c

High-level screening conclusion? - the options are similar to each other from a sustainability perspective. Unlikely to have significant effects.

Screened in for detailed appraisal? - No

Rationale: These options have been considered more widely within the context of the growth strategy alternatives appraisal. Detailed appraisal of these options is not required.

Options A and B are similar. The effects of Option A are likely to be neutral against all SA objectives as this option would carry forward the current (LP2036) approach. Option B could have potential minor negative effects depending on the precise location of any expansion and factors such as the environmental quality of any land taken for development, but the precise nature of any effects undertaken at this stage would depend on implementation and would ultimately require more detailed site-specific assessment, which would be subject to a separate appraisal against the SA Framework.

Option C would be likely to result in uncertainty in the decision-making process which could result in some minor negative effects on certain SA objectives (e.g., certain aspects of economic growth could be weakened but it is unlikely this objective would be significantly impacted upon by these locational uncertainties. It could ultimately involve more resources at the development management stage as each site would need to be assessed on a case-by-case basis to work out whether the location was suitable for employment uses.

Table 004a-4: Location of New Employment Uses - conclusions

14. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Limiting the acceptable locations for new employment-generating uses in a constrained city such as Oxford broadly aligns with the plan's overall strategy to prioritise housing. Focusing new employment-generating uses towards existing areas of employment can help to overcome existing accessibility issues and bring connectivity to support existing employment clusters through the delivery of key infrastructure projects (e.g., re-opening of the Cowley Branch Line to passenger trains).

Policy options set 004b (draft Policy E2) Warehousing and Storage Uses

15. New large scale B8 uses are usually low-density and do not generally make an intensive land-use. As a small, compact and constrained city, there are numerous competing pressures for land in Oxford. This means that there is often a need to make the best, or most efficient use of any land that comes available. As such, new B8 uses are not always the most appropriate use for land within the city. Freight consolidation can support Oxford's transition to a zero-carbon future. One of the actions highlighted in the Zero Carbon Oxford Partnership roadmap and action plan was to pilot freight consolidation around the edge of Oxford. This is to help deliver a successful transition to Zero Carbon living. It is important that the Local Plan 2045 does not prevent this taking place.

Table A1.5 - Policy options set 004b: Warehousing and Storage Uses

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A – Existing approach New B8 uses on sites not already lawful use are only allowed where the use is essential to the operation of a Cat 1 site Loss of B8 uses generally supported unless B8 use is essential for the ongoing support of a Cat 1 site.	This option would prioritise employment land in the city for more efficient and intensive land uses. By restricting B8 uses to support the operational requirements of the city's most important (Category 1) employment sites ensures that new B8 uses are delivered in way that supports and enables the continued or enhanced operation of employment sites with clear links to wider	Limiting B8 uses to Category 1 sites can preclude the legitimate expansion needs of suitably located local businesses that make a positive contribution to the economy by providing jobs to local people.

	economic aims as set out in national policy.	
Option B Where new B8 uses are allowed would be widened to enable support for the continued operation of locally recognised employment sites and those that support the national economy. Loss of B8 uses would generally be supported unless the B8 use is essential for the ongoing support of sites on which new B8 uses are allowed.	This option would support a wider range of employment sites to deliver B8 uses which could enable local businesses to expand and remain in Oxford, which can provide key services and support local jobs. This would align with national economic objectives relating to the continued growth of existing employment sites.	This approach would reduce the priority given to other uses that support the local, regional and national economy. It could bring B8, which often generates transport by HGV and LGV, into unsuitable areas. It allows this use which does not make best use of limited land.
Option C (in combination with option a) or b)) Introduce a specific exemption to enable the pilot of a suitably located freight consolidation centre	This option would enable LGV/ HGV freight to be moved to electric delivery vehicles, e-bikes and cargo-bikes at the edge of the city, rather than petrol and diesel LGVs and HGVs moving into residential areas and the city centre for deliveries. This would help to deliver City Council and partners' zero carbon partnership aims to decarbonise last mile deliveries in the city.	Any relaxation would need to be carefully managed to ensure it does not open up the potential for significant new storage facilities that do not make efficient use of land and that may not be well located in terms of the road network and avoiding congestion.
Option D Further restrict new B8 uses so they are generally not supported at all.	Further restriction of this inefficient land use could provide more land for priority uses.	Restricting B8 uses further in the city may result in potential difficulties for employment sites that rely on some B8 for their continued operation.

Option E Rely solely on national policy and other policies in the plan to assess applications for B8 uses in the city.	Could see an increase of B8 uses on a range of sites in the city, providing services and jobs.	Would neither actively restrict nor promote B8 uses in the city and would allow market forces to dictate the demand for B8 uses. This approach could reduce the priority given to other uses that support the local, regional and national economy.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b (in combination with c) or d or e

High-level screening conclusion? - the options are similar to each other from a sustainability perspective. Unlikely to have significant effects.

Screened in for detailed appraisal? - No

Rationale: Two of the options (Option A and B) seek to restrict the location of new B8 uses to certain existing employment sites, while one option (Option D) does not seek to support new B8 uses at all in the city. Option D (further restriction) is likely to have a minor negative impact the SA objective for economic growth as not supporting new B8 uses at all in the city may result in difficulties for sites that rely on an element of B8 for their continued operation. While not having a policy could lead to uncertainties about future delivery of B8 uses on sites where they may be needed, this is unlikely to have a significant effect.

Option C is a supplementary option and is considered in-combination with Options A and B. This option would be likely to deliver minor positive benefits which wider carbon reduction objectives. Option A would have a likely minor negative effect on economic growth as far as local supporting locally recognised employment sites, but this would be balanced out by a likely minor positive effect supporting nationally important sites and significant local employers. Option B (in combination with Option C) would be likely to have a minor positive effect on economic growth as it would support the widest selection of employment sites and could support existing businesses to expand, while remaining in Oxford. This can support local jobs and services.

Warehousing and Storage Uses – Draft Policy E2

16. The preferred approach for the Local Plan 2045 policy was based on the options set out in the above option set only. The preferred approach was to take forward a combination of **options B and C**. New warehousing and storage (B8) uses often involve large-scale developments that do not make an intensive land-use. As they do not always make the best use of available land, they are not always the most appropriate use for land within the city. It is important to support appropriately located B8 uses where they support the ongoing needs of businesses in the city. Option B supports B8 uses at a slightly wider range of employment sites than is currently allowed through the extant Oxford Local Plan 2036. This means that local businesses who operate on important locally important employment sites will also be able to deliver small-scale B8 uses to support jobs and continued employment-related uses on identified sites. Option C helps support the Council’s wider net zero ambitions to decarbonise ‘last mile’ deliveries in the city.

Policy options set 004c (draft Policy E3): Community Employment and Procurement Plans

17. Community Employment and Procurement Plans (CEPPs) have an important role to play in securing opportunities that arise from new development. In the operational phase of development, agreements to secure a proportion of the longer-term workforce or supply chain locally or commitments to community education and outreach can ensure ongoing benefits. In the construction phase they can provide opportunities for local people to be employed in the building industry (e.g. through apprenticeships/ training/ making links to local schools and colleges) or secure commitment from the developer to procuring material and labour locally. Another option is to commit to paying employees the Oxford Living Wage and only using contractors who pay this higher level than the National Living Wage.

Table A1.6 - Policy options set 004c: Community Employment and Procurement Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requiring applicants to submit a Community Employment and Procurement Plans alongside major development proposals, which also looks	Would introduce a partnership mechanism for securing community benefits from major development projects. Would help deliver the aims of the Economic Strategy and implement part of the linked Action Plan.	This could be seen as an unnecessary or onerous requirement of developers.

at the potential for engagement with training and education.		
Option B Encourage applicants to submit a Community Employment and Procurement Plans alongside all major development proposals but do not make this a policy requirement.	A voluntary approach would be flexible but applicants could still be encouraged to embark on CEPPs to provide opportunities for local people as they saw fit.	The voluntary approach is limited in scope and potential contribution that could be made. Measures set out in TAN are only presented as advice and guidance, no obligation to implement and no mechanism to monitor or enforce.
Option C Do not encourage or require applicants to submit a Community Employment and Procurement Plans.	Increased flexibility for applicants.	Removing encouragement from supporting text of plan may actively discourage applicants to submit Community Employment and Procurement Plans.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? a or b or c High-level screening conclusion? - the options are similar to each other from a sustainability perspective. Unlikely to have significant effects. Screened in for detailed appraisal? - No Rationale: The options most directly influence criterion 12. Economic growth, by providing for greater amounts of employment opportunities within the city. They are possible impacts on other criteria in the SA framework indirectly where these have a relationship to economic growth (e.g., accessible services/facilities, inequalities). Option a would be likely to have a minor positive impact by providing access to education and employment opportunities to local people. Option b as a continuation of the status quo, is likely to have neutral impact, whereas option c would be a retrograde step as the plan would not actively encourage skills and training opportunities. Overall, this option set is unlikely to have significant effects and therefore can be screened out from further assessment.

Community Employment and Procurement Plans (CEPPs) - Draft Policy E3

18. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Community Employment and Procurement Plans (CEPPs) have an important role to play securing opportunities that arise from new development. CEPPs can help businesses by addressing skills shortages locally through supporting appropriate training, apprenticeships and providing other commitments local both at the construction and operational phases of development. The preferred approach is to include a policy requiring CEPPs to be submitted alongside applications for qualifying developments.

Policy options set 004d (draft Policy E4) – Affordable workspaces

19. Oxford's economic successes have brought with them unforeseen challenges. Post-pandemic, the city has seen significant and increasing demand for high value employment land uses (such as R&D and flexible lab-enabled office development). This relatively new and high demand for these high-value land uses, coupled with a constrained land supply and a need to deliver other priority uses such as new homes in the city, has resulted in increased pressure to redevelop lower value premises across the city's employment site network.
20. A need for affordable workspaces to support certain identified sectors of Micro SMEs has been created by a combination of rising rents, high demand for larger-floorplate, high-value land uses, a lack of physical space in the city, and increasing land values have resulted in a failure in the market to provide suitable accommodation for a range of businesses and enterprises that can contribute to and support the economic diversity of an area. Oxford City Council's Economic Strategy highlights some of the key sectors that require these spaces. It also sets out the importance of providing affordable workspaces for the 'inclusive economy' i.e., to support creative activity, social enterprise, co-operative businesses and local start-ups in the city. The following options were considered.

Table A1.7 - Policy options set 004d: Affordable workspaces

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Introduce a policy requirement to deliver affordable workspaces on larger commercial development sites (in use Class E)	Likely to be the approach which would secure the most affordable workspace and help facilitate an inclusive and diverse economy.	Depending on the requirements of any future policy, this approach may be considered onerous. It will need to be backed up by appropriate viability evidence.
Option B Introduce text in the local plan encouraging employers to deliver affordable workspace in the city.	Allows the market flexibility to determine the type of employment space provided.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city. Not providing support for affordable workspaces in the plan would not help to secure and deliver these types of spaces.

		As such the wider benefits from economic growth linked to Oxford's key sectors in science and innovation, would not be realised by all the city's residents.
Option C Do not incorporate the concept of affordable workspace in the Local Plan.	Leave the market to determine the type and amount of employment space to be provided across the city.	This could be a missed opportunity to address the issue of unaffordable workspaces in the city and therefore to help secure the benefits of a strong, fair and inclusive economy.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or c

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: While the policy may have economic and social value benefits, in land-use terms, development is happening anyway and is likely to be needed to support the delivery of affordable workspace on qualifying sites.

Affordable workspaces – Draft Policy E4

21. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. Including a policy requirement to deliver affordable workspaces helps key sectors (including those identified through the City Council's Economic Strategy), that make a vital contribution to the diversity of the economy. Suitable workspaces and premises to support the 'inclusive economy' can help foster creative activity, social enterprise, co-operative businesses and local start-ups in the city. Including a policy requirement to support the delivery of affordable workspaces in the Oxford and help facilitate an inclusive and diverse economy.

Policy options set 004e-1 (draft Policy E5): New Tourism and Short Stay Accommodation

22. Oxford's visitor economy makes an important contribution to jobs in the city. It is therefore important to support new and existing tourism and short stay accommodation in appropriate locations so that visitors to the city are encouraged to spend more time (overnight stays) and increase spend to support the local economy. Longer stays can reduce the numbers of "day-trippers" as high volumes of these types of visitors adversely impact traffic congestion and associated air quality issues.

23. This option sets look at locations for new tourism and short stay accommodation

Table A1.8 - Policy options set 004e-1: New Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Allow new sites for tourism and other short-stay accommodation in the city and district centres, on allocated sites and on Oxford's main arterial roads only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations. Likely to benefit Oxford's economy through supporting a higher percentage of Oxford's visitors to stay overnight. Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	Potential for increases in traffic along arterial roads and potential risk that this use could become dominant in locations supported by the policy.
Option B Allow new short stay accommodation in the city and district centres, and on allocated sites only.	Approach would continue to encourage new short-stay accommodation in sustainable and accessible locations and provide control over which sites outside of these areas were appropriate to deliver short-stay accommodation.	May increase pressure for town centre uses in city and district centres and reduce variety of uses in these locations. Would reduce the number of locations where tourist accommodation is deemed appropriate, and it may not be possible to meet needs.

	Potential to enhance the vibrancy of the city and district centres by allowing tourist accommodation to be located here.	
Option C Support new short stay accommodation anywhere in Oxford.	Would increase potential locations where short stay accommodation is deemed appropriate. This is likely to encourage overnight stays in Oxford which is likely to have positive benefits for the city's visitor economy.	Allowing short-stay accommodation across Oxford could result in sites being developed that are poorly located in terms of potential traffic impacts or could have negative impacts on residential amenity, for example. Could result in more accommodation being provided where other priority uses (e.g., housing) would have been appropriate.
Option D Outside of the city and district centres, seek to resist new short-stay accommodation anywhere in the city.	May support the delivery of other priority uses (e.g., housing) in locations outside the city and district centres	May increase competition for land for tourism and short stay accommodation with other main town centre uses within the city and district centres. This could lead to a less diverse offer of tourism and short stay accommodation as higher land values in some centres would lead to the delivery of higher value accommodation (e.g., hotels) only.
Option E Do not include a policy on new short stay accommodation in the city. Instead rely on national policy to delivery new short stay accommodation in the city.	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such	Hotels are included within the list of 'Main town centre uses' set out in Annex 2: Glossary (NPPF, December 2024). As such

	impacts of this option are essentially very similar to Option B (above).	impacts of this option are essentially very similar to Option B (above). Short-stay accommodation is not generally considered a suitable use outside of the city and district centres unless identified need shows otherwise. This approach may lead to uncertainty regarding where new accommodation would be supported and could lead to applications outside of sustainable accessible locations.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or d or e

High-level screening conclusion? - the options are similar to each other from a sustainability perspective and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: Option A maintains the current locational approach supporting new tourism and short stay accommodation in a variety of accessible locations across the city. This would be likely to result in a neutral effect on all the Sustainability Objectives. Option B proposes a more limited selection of locations. By reducing the acceptable locations for new tourism and short stay accommodation it could have a minor negative effect on the visitor economy although the overall impact on the SA objective for economic development would be likely to remain positive. Option C would enable new tourism and short stay accommodation opportunities to be delivered across the city. This option could result in this type of accommodation being delivered in less accessible locations which could have minor negative impacts on local amenity and transport-related objectives. Option D is the most restrictive option and would only support new tourism and short stay accommodation in the city and district centres. This would be likely to have minor positive effects associated with housing outside of these locations, but it would increase competition within the city and district centres where land values may be higher, which may result in a focus on high-value accommodation. This may not achieve wider aims associated with the visitor economy of encouraging longer stays and increased spend in the city. Finally, not having a policy

could lead to uncertainty over locations where new tourism and visitor accommodation would be supported. This may result in competition with other priority uses.

Policy options set 004e-2 (draft Policy E5): Existing Tourism and Short Stay accommodation

24. Short stay accommodation helps meet the needs of tourists and other visitors, including business travellers and travelling researchers. Availability of sufficient short-stay accommodation may help to encourage tourists to stay for longer and help contribute to the success of businesses and the economy, but it also has impacts, including that it competes with other uses, and travel impacts. There may be reason to protect it, but where it is located is important in managing impacts and not all existing provision will be optimal. This final option set considers whether to include a policy supporting the expansion of existing short stay accommodation and protecting existing accommodation or not.

Table A1.9 - Policy options set 004e-2: Existing Tourism and Short Stay Accommodation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Do not include a policy protecting existing short-stay accommodation in the city and instead rely on other policies in the plan and national planning policies.	This option would mean that Oxford is reliant solely on market forces to protect its existing stock of short stay accommodation. Whilst providing flexibility for developers, it would not necessarily help the city to achieve its wider tourism aims and objectives.	Could provide uncertainty for existing short-stay accommodation owners and occupiers. May not effectively promote Oxford's visitor economy by encouraging more overnight visitation.
Option B Allow the expansion of existing short-stay accommodation providing certain criteria are met.	Likely to provide support for Oxford's visitor economy by protecting existing facilities and allowing their appropriate expansion.	Inclusion of criteria which must be met before a loss will be permitted (such as viability, marketing etc.) would ensure that existing sites that function poorly are not prevented from being redeveloped.

Seek to protect existing accommodation and allow loss only if specified criteria are met (i.e., by providing viability evidence or if the location is not one where new short stay accommodation would be allowed).	It is important to seek to prevent the loss of existing visitor accommodation to other uses because tourism is an important contributor to the day and evening economy of the city.	

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: As these are existing sites, from a sustainability perspective whether to include policy guidance supporting appropriate small-scale redevelopment or changes or use, or not, is unlikely to result in significant effects on the any of the sustainability objectives.

Tourism and Short Stay Accommodation – Draft Policy E5

25. Draft Policy E5 combines the preferred approaches from two options sets. Each options set considers a discrete element of the policy. The two options sets are as follows:
- 004e-1: New Tourism and Short Stay Accommodation
 - 004e-2: Existing Tourism and Short Stay Accommodation
26. The preferred approach for each option set is set out below:

004e-1: New Tourism and Short Stay Accommodation

27. The preferred approach for the Local Plan 2045 policy is to take forward **option A**. This supports new tourism and short stay accommodation on allocated sites and at a variety of accessible locations across the city. It also helps deliver the city's wider visitor economy aims to encourage longer stays and increased spend in the city. The draft policy includes locational requirements that set out where new tourism and short stay accommodation in the city would be acceptable and supported through the planning process.

28. Focusing new tourism and short stay accommodation towards inherently sustainable highly accessible locations helps to reduce reliance on the private car and supports public transport and other non-car modes. It also aligns with the plan's overall strategy to prioritise housing as it reduces the pressure to locate new tourism and short stay accommodation on sites more suitable for housing.

004e-2: Existing Tourism and Short Stay Accommodation

29. The preferred approach for the Local Plan 2045 policy is to take forward **option B**. Supporting the appropriate expansion of existing tourism and short stay accommodation helps achieve the wider visitor economy aims and can also protect local amenity. The inclusion of criteria relating to the loss of tourism and short stay accommodation provides clarity about what is expected of applicants in a range of different circumstances.

Background paper 004a

Title: Key Employment Sites Methodology

This paper sets out the approach and methodology that was undertaken in developing the city's Key Employment Sites.
Relevant Local Plan 2045 Objective(s): • Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation. • Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper. • Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city. • Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.
Relevant SA Objective(s): 12. To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.
SEA theme(s): Population and material assets.

1. Introduction	1
2. Methodology for Site Selection	2
Development of the Employment Site Assessment Pro-Forma	2
Employment site identification process	2
Identified employment sites: initial site size filter	2
Employment site assessments.....	3
How the Key Employment Sites were identified	3
Key Employment Sites: consideration of emerging Local Plan 2045 policy framework.....	5
3. Oxford's Key Employment Sites	8
Appendix 1: Employment Site Assessment Pro-Forma	9
Appendix 2: Guidance Notes for Pro-Forma.....	15
Appendix 3 – List of sites assessed using the Pro-Forma.....	18

Appendix 4 – Final scores for assessed sites.....	20

1. Introduction

- 1.1. This background paper focuses on providing an explanation of the approach and methodology undertaken in developing the policy for, and identifying, the city's Key Employment Sites.
- 1.2. It does not seek to simply repeat the content of sections of *Background Paper 004: Employment and Inclusive Economy*. Instead, it supplements existing information. As such, it does not follow the same structure.
- 1.3. The aim of this Background Paper is to provide the reader with a clear understanding of the process that was undertaken in the selection of Oxford's Key Employment Sites.

2. Methodology for Site Selection

Development of the Employment Site Assessment Pro-Forma

- 2.1. The first step in the process was the development of Site Assessment Pro-Forma. The Pro-Forma (re-produced at Appendix 1) was developed in consultation with the consultant team employed by the City Council to undertake the Employment Land Needs Assessment (ELNA) – drawing on their many years of experience in undertaking Employment Land and Economic Need Assessments for Local Authorities.
- 2.2. The Pro-Forma consists of two sections. The first part is a desktop assessment and the second, an on-site assessment. City Council officers undertook the individual site assessments, using the guidance notes as set out at Appendix 2.
- 2.3. However, before the site visits were carried out, a list of employment sites that required assessment was compiled. The employment site identification process is discussed in the next section.

Employment site identification process

- 2.4. A range of sources was used to compile the list of employment sites that were assessed using the Pro-Forma including:
 - Category 1 and Category 2 Employment Sites (Local Plan 2036 Policy E1)
 - Oxford Local Plan 2036 site allocations for employment uses
 - “Key Protected Employment Sites” which were the subject of the historic Article 4 Direction (2014)
 - Local Plan 2045 Strategic Housing Land Availability Assessment and its predecessor, the Housing and Economic Land Availability Assessment, which considered the suitability of sites for housing and economic uses.
- 2.5. This identification process uncovered 172 potential employment sites for further consideration.

Identified employment sites: initial site size filter

- 2.6. The first step in the assessment process was the application of an initial site size filter. The Planning Practice Guidance (PPG) Paragraph 009 Reference ID 3-009-20190722 suggests using a site area of 0.25ha (or 500 square metres of floorspace) when undertaking assessments of economic land.
- 2.7. City Council Officers discussed the use of a threshold with the appointed ELNA consultants. The consultants confirmed that the use of a site size threshold was consistent with other work they had undertaken and considered the 0.25ha threshold suitable for application in this instance.
- 2.8. As site size information was readily available in hectares (as opposed to floorspace) for the sites, the City Council concluded that use of a 0.25ha minimum site size threshold was appropriate.
- 2.9. The site size filter was then applied to the 172 potential sites. 113 sites were below the threshold, leaving 59 sites for further consideration.

Employment site assessments

- 2.10. Prior to undertaking the site assessments using the Pro-Forma, a sense check was undertaken by City Council officers. This sense-check resulted in the removal of duplicate entries, for instance, where several individual but adjacent employment sites were listed in addition to the collective larger employment area (i.e. making sure that component parts were not double counted as part of a larger area). In this case, the smaller duplicate entries were removed.
- 2.11. Sites were also removed from the assessment where there was no reasonable prospect of employment-related uses coming forward in the plan period (i.e., where sites had previously been redeveloped for housing).
- 2.12. This process left 50 sites which were then assessed using the Pro-Forma. Appendix 3 provides a list of the sites assessed.
- 2.13. City Council Officers undertook site visits during Spring 2025.
- 2.14. Each site was scored using the Pro-Forma (Appendix 1) using the Guidance Note (Appendix 2) to ensure a consistent approach. The scores therefore reflect a snapshot of each employment site at the time the site visit was undertaken.
- 2.15. Appendix 4 provides a summary of the scores attained for each site.

How the Key Employment Sites were identified

- 2.16. Having collated the results from the site assessments, the next step towards establishing the Key Employment Sites involved the comparison of all sites assessed. The top scoring sites were generally larger, well-established employment sites. For instance, the top three ranked sites, Oxford Science Park, ARC Oxford and the Churchill Hospital, all have a site area of more than 20ha.
- 2.17. By contrast the lowest ranked sites, which include the Former Blanchford's Building Supplies site in Headington, the Dairy Depot site on the Old Abingdon Road, and the Storage Yards located on Binsey Lane, were all generally smaller sites (1ha or under) with limited, or single current or previous occupiers.
- 2.18. A degree of professional judgement based on the collected data and qualitative considerations was used in identifying which sites were selected as Key Employment Sites. A range of factors were considered in coming to the decision. These factors included (but were not limited to):
- Local Plan 2036 Employment site category status
 - Site size
 - The redevelopment potential of sites within the plan-period
 - The ability of sites to support a broad range of jobs
 - Timing of the assessment
 - The contribution made by sites to the local and/or national economy
 - The ability of sites to contribute to the social value of an area
 - The ability of sites to accommodate a range of occupiers
- 2.19. After careful consideration, on balance and in the light of the above factors, it was proposed that those sites which scored 36 points or more had a more positive alignment with the qualitative decision-making criteria.
- 2.20. A sense check to this approach was also undertaken, where it was observed that sites that did not qualify as Key Employment Sites were generally smaller employment sites with a single occupier or limited occupancy. It was also observed that majority of sites scoring 35 or less were those considered within the extant Local Plan 2036 policy framework, to be Category 3 employment sites (i.e., smaller, less-well located, etc.). It is worth noting at this stage, that the Pro-Forma was specifically designed to consider the site characteristics at the time it was assessed. This enables a degree of parity to be applied when comparing and ranking the site scores.
- 2.21. The sense check also involved consideration of the characteristics and circumstances which gave rise to the scores attained for certain individual sites. For instance, Oxford North and the Unipart site both scored 36 points in the assessment. As these sites are recognised as "Category 1" employment sites in the extant Local Plan 2036 policy framework (i.e.,

nationally or regionally important to the knowledge economy or represent significant employers or sectors within the city). As such, these two sites were considered further.

- 2.22. The score, particularly in the case of Oxford North, reflected the timing at which the assessment was undertaken (i.e., Spring 2025, while Phase 1A of the site was still under construction). As such, the assessment resulted in certain criteria scoring lower than if the site was operational. Given the strategic nature of Oxford North, its extant employment site status (Category 1), the ability of the site to deliver a broad range of jobs throughout the plan period (both construction and operational phase) and timing of the assessment (i.e., spring 2025, while the site was under construction), set it apart from those sites that scored 35 or below.
- 2.23. In the case of the Unipart site, the score also reflected the assessment as at Spring 2025. Like Oxford North, this site also has Category 1 employment site status under the extant Local Plan 2036 policy framework. While there is redevelopment potential at the site within the plan period, the scale of opportunity is yet to be quantified. Given the site's former Category 1 status, its size (circa 30ha) and the redevelopment potential of the site within the plan period, Officers considered these aspects set the site apart from the smaller sites scoring 35 or more.
- 2.24. As such, the city's Local Plan 2045 Key Employment Sites consisted of larger sites, all of which were able to support a broad range of jobs, or occupiers; which made a contribution to the national, or local economy; and/ or were sites that contributed to the social value of their local area. This process resulted in a list of 38 sites.
- 2.25. For completeness, this approach resulted in the removal of the following twelve sites which scored below the threshold adopted:
- 474 Cowley Road (Former Powell's Timber Yard)
 - 79-83 Temple Road
 - A.W. Clarke (Engineering) Ltd, Sandford Road
 - Bossom's Boatyard, The Towing Path
 - Cowley Marsh Depot, Marsh Road
 - Dairy Depot, Old Abingdon Road
 - Fire Station, Rewley Road
 - Former Builder's Yard (Blanchford's Building Supplies)
 - Harcourt House, Marston Road
 - Salter Brothers Ltd, Meadow Lane
 - Storage Yards Binsey Lane
 - Units 1-4, 385 Cowley Road

Key Employment Sites: consideration of emerging Local Plan 2045 policy framework

- 2.26. The emerging Local Plan 2045 policy framework contains certain elements that apply to development proposals within the city and district centres, and others that apply specifically to Key Employment Sites.
- 2.27. This section provides the qualitative analysis, considering the of potential implications of the application of other policies in the emerging plan, that was undertaken in arriving an appropriate site size threshold for Key Employment Sites located within the city and district centres.
- 2.28. The following policies were considered as part of the analysis:
- 2.29. Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development establishes the over-arching spatial strategy for the city. The policy sets out a number of measures to help achieve the vision and objectives of the plan.
- 2.30. Bullet point b) is specifically relevant to the city and district centres. It allows flexibility of uses within these locations, so that the city and district centres can respond quickly to changing needs and economic circumstances and ensure a wide mix of uses, including housing, are encouraged.
- 2.31. Policy E1: Employment Strategy introduces a set of criteria, designed to protect Key Employment Sites by ensuring that, where a loss of floorspace is proposed, that the employment use can be maintained, and the number of jobs in employment generating uses is retained.
- 2.32. Policy E2: Warehousing, Storage and Distribution Uses (hereafter 'B8 uses') focuses new B8 uses at the city's network of Key Employment Sites only, introducing specific residential amenity criteria to ensure that any B8 are delivered in a way that does not result in an adverse impact on residential amenity.
- 2.33. The following six employment sites (located within the city and district centres) scored 36 points or more. Table 2.1 (below) sets out the specific sites, their relative size, and the overall score achieved. All sites were located in the city centre. This table shows that that two of sites are very large (i.e., over 5ha), while the remaining four sites are all smaller sites of less than a hectare (three of which being 0.3ha).
- 2.34. The Plan's overarching strategy allows flexibility of uses within the city and district centres. This is so that the city and district centres can respond quickly to changing needs and circumstances and ensure that a wide range of uses, including housing, are encouraged. However, Policy E1 is designed to protect the city's network of Key Employment Sites from loss to other uses, thus reducing flexibility of uses within the city and district centres.

Table 2.1 List of employment sites located in the city and district centres

Site Name/ Address	Site size (ha)	Total score
Beaver House/ Hythe Bridge St	0.3ha	39
County Hall/ New Rd	0.3ha	40
Island site/ Park End St Hythe Bridge St	0.7ha	36
Osney Mead	17.8ha	38
Oxford Town Hall/ St. Aldate's	0.3ha	39
Oxpens/ Oxpens Rd	6.3ha	37

- 2.35. As such, in order to allow the flexibility of uses within the city and district centres (as set out in Policy S1) a larger site size threshold for Key Employment Sites located in the city and district centres is considered appropriate. A first stage filter was then applied.
- 2.36. Consideration was given to the implications of setting this initial site size threshold filter at 0.5ha or 1ha, as in reality allowing flexibility on employment sites either 0.5ha or less or 1ha or less within the city and district centres, was considered to be something that most landowners or agents would generally welcome.
- 2.37. If the initial site size filter is set to 0.5ha, the three smallest sites (all circa. 0.3ha) are removed from further consideration. However, if the initial site size filter is set at 1ha, one additional site (0.8ha) is also removed.
- 2.38. The 2ha site size threshold, however, was considered more appropriate for city and district centres. This is because Policy E2: Warehousing Storage and Distribution Uses only supports B8 uses Key Employment Sites.
- 2.39. Unfortunately, there is a drafting error in the first sentence of Paragraph 5.40 of Background Paper 004: Employment and Inclusive Economy, which should read as follows:

Given the premium land values associated with the prime city centre office and R&D market, it is not expected that many B8 uses would be sought in these locations.

- 2.40. The ability of Key Employment Sites within the city and district centres to be able to accommodate an element of small-scale B8 uses was an important consideration in coming to the site size threshold of 2ha. It was considered that, the larger sites had more potential to support an element of B8 uses than the smaller sites. Examples of B8 uses that might be considered within larger Key Employment Sites in city centre locations include sustainable last mile delivery solutions (e.g., cycle/e-bike couriers/ hubs and innovations supporting the circular economy (e.g., “reverse logistics” hubs).

- 2.41. The potential contribution of each site to the city's employment land supply was also a factor in determining the threshold. The ELNA recognises the contributions of each of the three largest city centre sites. The Oxpens site is likely to deliver a minimum of around 60,000sqm GIA and this is recorded within the planning commitments. While the scale of opportunity at Osney Mead was yet to be quantified, the site currently performs an important role as an Industrial Estate providing space for a variety of local businesses. At 17.8ha, it is important that the employment use of the site is maintained and that the number of jobs in employment-generating uses retained. This site clearly performs an important role in the city now and will continue to do so in the future.
- 2.42. The Nuffield Sites (which include the 0.7ha Island site) is a mixed-use allocation across three separate parcels, two of which are likely to be for employment generating uses. Although the ELNA suggests 28,500sqm across the sites (based on landowner consultation). Assuming that any employment floorspace was split evenly across the two parcels, this would deliver 14,250sqm at the Island site. This represents a relatively small proportion of the city's overall employment floorspace need.
- 2.43. As set out above, the 2ha Key Employment Site size threshold for the city and district centres was arrived at using professional judgement. It has taken into account range of qualitative factors, which stem from the importance of allow flexibility of uses in the city and district centres.
- 2.44. The 2ha site size threshold was therefore considered to adequately capture the larger Key Employment Sites while also enabling a degree of flexibility to enable their redevelopment for a forward a wide mix of uses, including housing, in the city's most sustainable locations.
- 2.45. This approach resulted in a list of 34 sites. For completeness, the application of a 2ha site size threshold within the city and district centres resulted in the removal of the following four sites:
- Beaver House, Hythe Bridge Street
 - County Hall, New Road
 - Oxford Town Hall, St. Aldate's
 - Island site, Park End Street

3. Oxford's Key Employment Sites

3.1. The above process results in 34 employment sites being identified as Oxford's Key Employment Sites for the purposes of the policies in the Reg. 19 Plan. These sites are therefore listed in Appendix 3.1 of the Reg. 19 Plan, are shown on the Policies Map. They are listed below:

- 496 Cowley Road
- ARC Oxford
- Ashville Way Industrial Estate, Watlington Road
- Botley Road Retail Park
- Chiltern Business Centre, Garsington Road
- Churchill Hospital
- County Trading Estate, Watlington Road
- Eastpoint Business Park
- Fenchurch Court, Bobby Fryer Close
- Horspath Industrial Estate, Pony Road
- Huw Grays (formerly Buildbase), Watlington Road
- John Radcliffe Hospital
- Jordan Hill Business Park
- Light Industrial Units, Green Road
- MINI Plant Oxford
- New Barclay House, 234 Botley Road
- Newtec Place, Magdalen Road
- Nuffield Industrial Estate, Ledgers Close
- Nuffield Orthopaedic Hospital
- Old Road Campus
- Osney Mead
- Oxford Bus Company, Cowley House, Watlington Road
- Oxford North
- Oxford Science Park
- Oxford Trade Centre, Harrow Road
- Oxford University Press, Great Clarendon Street
- Oxpens
- Radcliffe Observatory Quarter (ROQ)
- The Gallery, 54 Marston Street
- Trade City Oxford and Network Oxford
- Unipart site
- University of Oxford Science Area and Keble Road Triangle
- Warneford Hospital

3.2. Wood Centre for Innovation

Appendix 1: Employment Site Assessment Pro-Forma

Employment Sites Assessment Pro-Forma – Desktop Assessment (Part 1)	
Site name	
Site address	
Site area (hectares)	
HELAA reference number	
Site allocation (OLP2036 site reference)	
Employment Site Category	
Policy considerations	
Physical/ environmental considerations	
Current use (including use class(es))	
Planning Status (i.e., live application, under construction, permission granted, complete etc.)	
Proportion of site undeveloped/ underdeveloped with potential for intensification	

Site location plan:

Accessibility	
Q1	Access to the Strategic Road Network (qualitative assessment)
	<i>Brief description of route/ describe the path from site to SRN (e.g. does it go through LTN or residential neighbourhood or is it fairly clear vehicular route):</i>
Q2	Public transport (including rail) access
1	Poor: remote site, poor infrequent public transport access
2	Fair: more than 800m from a railway station or a frequent service bus stop
3	Good: between 400-800m from a railway station or a frequent service bus stop (4 buses per hour)
4	Very good: good access to one or more frequent service bus stops (less than 400m) / within walking distance of a railway station (less than 400m)
	<i>Notes:</i>

Site characteristics

Q3	Contamination (qualitative assessment)
	<i>Brief description about any known contamination or potential issues:</i>

Market Conditions	
Q4	Market Perception (sites over 0.5ha)
1	Poor: low demand, difficult to attract occupiers even with heavy marketing
2	Fair: requires strong marketing/incentives to attract new occupiers
3	Good: good demand, units don't remain unoccupied for long
4	Very good: viewed as attractive by agents/occupiers; strong demand; units rarely available/appears to be all full
	<i>Notes:</i>

Q5	Marketing evidence: what evidence is there that the site has been actively marketed? (Sites over 0.5ha only) (qualitative assessment)
	<i>Notes:</i>

Ownership and potential for development	
Q6	Ownership factors (qualitative assessment)
	<i>Include any known information about ownership, e.g., site promoter, etc.):</i>

Q7	Availability for development/ redevelopment/ intensification
1	Poor: constraints on development or owner aspirations for other uses, history of non-take-up, unlikely to be available for additional employment within 5 years or more
2	Fair: no active discussions but no specific constraints to development either.
3	Good: landowner actively pursuing / discussing future investment (e.g., consultation events; known intentions to develop in short-term – i.e., within five years)
4	Very good: land likely to be available for development/ occupation within immediate term (i.e., 1-2 years) (recent grant of planning permission/ current 'live' planning application)
	<i>Notes:</i>

Q8	What development would the landowner/developer consider/propose (housing, employment, other commercial, mixed use or unknown)? (qualitative assessment)
	<i>Notes:</i>
Supports regional economic objectives (e.g., Oxford Cambridge Growth Corridor/ Enterprise Oxfordshire)	
Q9	Regional economic development opportunities

1	Poor: site does not have ability to deliver any regional economic development objectives
2	Fair: site has limited ability to deliver regional economic development objectives
3	Good: site has good ability to deliver some regional economic development objectives
4	Very good: site has excellent ability to deliver several significant regional objectives
	<i>Notes:</i>

Wider economic factors (Social Value)	
Q10	Deprivation and Regeneration Areas (assessed under 2019 IMD)
1	Poor: site within the most affluent neighbourhoods (super output area is in top quartile of least deprived (0-25% least deprived))
2	Fair: site within a neighbourhood ranked as average to affluent (super output area is 25-50% least deprived)
3	Good: site within a neighbourhood ranked as average to deprived (super output is in the 25%-50% most deprived)
4	Very good: site is within a neighbourhood ranked as deprived (super output area is 0-25% most deprived) and within a City Council Regeneration Area
	<i>Notes:</i>

Q11	Local factors
1	Poor: site does not deliver any local development objectives
2	Fair: site delivers limited number of local development objectives
3	Good: site delivers some local development objectives
4	Very good: site delivers majority of local development objectives
	<i>Notes:</i>

Sub-total score of desktop assessment (Part 1):

Employment Sites Assessment Pro-Forma – On-site Assessment (Part 2)

Site name	
Site address	

Accessibility

Q12	Local road access
1	Poor: difficult/narrow road access, via residential roads, difficult site junction, congested roads or restricted heights/weights
2	Fair: some access issues as outlined above
3	Good: generally good access with few issues for HGVs and limited congestion
4	Very good: via free-moving good roads, avoiding residential areas and difficult junctions
	Notes:

Q13	Walking and Cycling
1	Poor: no existing footpaths or cycle paths to the site
2	Fair: some footpath or cycle paths although limited provision/not continuous
3	Good: reasonable paths available but some limitations such as poor-quality surface/lighting/crossings etc.
4	Very good: good and attractive footpath and cycle links from residential areas
	Notes:

General location and neighbours

Q14	General location; proximity to amenities and facilities (and labour)
1	Poor: remote site, no amenities or facilities easily accessible
2	Fair: limited facilities available although access may be more difficult (1-1.5 Km)
3	Good: good access to some facilities (within 0.5 -1 Km)
4	Very good: easy access to a range of amenities and facilities (within 0.5 Km)
	Notes:

Q15	Neighbouring uses (qualitative assessment)
	Describe neighbouring uses and any sensitivities they may have in relation to the site itself:

Site Characteristics

Q16	Topography; size; profile

1	Poor: sloping/uneven site; under 0.5 ha. size; irregular/narrow shape; difficult access point
2	Fair: some of the above issues
3	Good: some of the advantages below
4	Very good: generally level site; regular shape; over 2ha. in size; good access point
	<i>Notes:</i>

Quality of local environment	
Q17	Age of existing premises (tick as appropriate)
	Pre-1980
	1980-2010
	Post-2010
	<i>Notes:</i>

Q18	Condition of existing premises
1	Poor: buildings and external areas are of very poor quality and condition / very restricted circulation and servicing facilities
2	Fair: generally, buildings and external areas appear adequate, although some aspects may be poor
3	Good: generally, buildings and external areas are of good standard
4	Very good: buildings/ external areas are of a very good quality and condition providing a good range of building type, size and tenure / good circulation and servicing facilities
	<i>Notes:</i>

Q19	General attractiveness of location
1	Poor: surrounding environment is of poor quality; low profile/visibility; poor/run-down/unattractive appearance; attracts lower end users
2	Fair: some of the above aspects are more attractive
3	Good: most aspects are attractive though some users would likely look for a better standard
4	Very good: quality of surrounding environment will likely be a positive factor to attracting occupiers; high profile/visibility; high quality appearance, environment and quality of occupiers
	<i>Notes:</i>

Q20	Environmental quality
1	Poor: the site is substantially exposed to noise, dust and/or smell which significantly affects the quality of the immediate environment
2	Fair: the site is exposed to some noise, dust or smell which somewhat affects the quality of the environment at certain periods of day

3	Good: occasionally, the site is exposed to some noise, dust or smell which can affect the amenity of the immediate environment
4	Very good: the site does not appear to be exposed to unreasonable levels of noise, smell, dust or other amenity factors
	Notes:

Q21	Green and blue infrastructure (GBI) features – <i>this could include areas of green space, trees and shrubs, ponds, canals/rivers, green walls or roofs.</i>
1	Poor – little or no GBI features on the site. If located on site, relatively disparate and/or of low quality, the area is entirely or predominantly artificial in surface cover.
2	Fair – there are some areas of GBI features on the site, or features which seem of average quality.
3	Good – GBI covers a fairly large area of the site, or forms some good connections to neighbouring areas, or includes features which seem of a good quality.
4	Very good - GBI makes up extensive parts of the site, or forms strong connections to neighbouring areas, or includes features which seem of a very high/exceptional quality.
	Notes:

Market conditions	
Q22	Vacancy levels
1	Poor: over 25% site/premises vacant
2	Fair: 15-25% site/premises vacant
3	Good: 10-15% site/premises vacant
4	Very good: under 10% of site/premises vacant
	Notes:

Sub-total score of on-site assessment:

Total score: Desktop (part 1) and On-site (Part 2) assessment:

Notes:

Appendix 2: Guidance Notes for Pro-Forma

Employment Site Assessment Pro-Forma – Desktop Assessment (Part 1)	
Site name	
Site address	
Site area (hectares)	
HELAA reference number	
Site allocation (OLP2036)	
Category of employment site	
Policy considerations (only applies to non-SHLAA sites 0.25ha or more)	
Physical/ environmental considerations (only applies to non-SHLAA sites 0.25ha or more)	
Current use (including use class(es))	
Planning Status (e.g. under construction, has a permission in place, etc.)	
Proportion of site undeveloped/ underdeveloped with potential for intensification	

Site location plan:
<i>[Insert Site Location Plan]</i>

Section/ Question(s)	Instructions
Accessibility	
1. Access to Strategic Road network	1. Describe access from the site to the Strategic Road Network.
2. Public transport (including rail) access	2. A frequent service bus stop is one with four or more buses per hour.
Site Characteristics	
3. Contamination	3. Description of any known contamination issues.
Market Conditions	
4. Market Perception (site size 0.5ha or more)	4. Use evidence from web-searches, etc. to inform judgement about occupancy demand.
5. Marketing evidence (site size 0.5ha or more)	5. What evidence is there that the site has been actively marketed? Make a note of any commercial property lettings (e.g., from web-search) at the time of the assessment.
Ownership and potential for development	

6. Ownership factors (site size 0.5ha or more) 7. Availability for development 8. What development would the landowner/ developer consider/ propose?	6. What publicly available information exists about ownership? Is there a site promoter, etc? 7. Has there been a recent, or is there a current planning application at the site? 8. Check call-for-sites response forms, for example.
Supports regional economic objectives 9. Regional Economic Development Objectives	9. Regional economic objectives - Supports investment, growth and expansion of key sectors such as Science (STEM, Life Sciences etc.), and knowledge-based industries - Supports existing businesses to “scale-up” - Helps to attract new ‘high growth’ companies to Oxfordshire; - Supports investment in transport infrastructure to improve connectivity within Oxfordshire and with other major economic hubs (e.g., Cowley Branch Line, Oxford Railway Station improvements); Regional Economic Factors scoring: 1 – no objectives met 2 – 1 objective met 3 – 2-3 objectives met 4 – all objectives met
Wider Economic Factors 10. Deprivation and regeneration areas 11. Local factors	10. Use IMD database (2019) to work out deprivation scores. A “regeneration area” in this context, is an area which scores in the top 25% ‘most-deprived’ areas in the country. 11. Local Factors: - Site likely to support mainly local jobs - Site likely to support mainly micro (0-9) and/ or small business(es) - Site offers opportunities for training and skills - Provides a local/ community service (i.e., repairs, recycling, etc.) Local Factors scoring: 1 – no objectives met 2 – 1 objective met 3 – 2-3 objectives met 4 – 4 objectives met

Employment Sites Assessment Pro-Forma – On-site Assessment (Part 2)	
Accessibility 12. Local Road Access 13. Walking and Cycling	12. Assess site using specified criteria 13. Assess site using specified criteria
General location and neighbours 14. General location; proximity to amenities and facilities (and labour) 15. Proximity to incompatible uses	14. Assess site using specified criteria 15. Describe neighbouring uses and any sensitivities they may have in relation to the site.
Site characteristics 16. Topography; size; profile	16. Consider site size, shape topography and site access.
Quality of local environment 17. Age of existing premises 18. Condition of existing premises 19. General attractiveness of location 20. Environmental quality 21. Green and blue infrastructure features	17. Estimate the age of the premises. (Supplement with further desktop work if required) 18. Assess site using specified criteria 19. Assess site using specified criteria 20. Assess site using specified criteria 21. Assess site using specified criteria
Market conditions 22. Vacancy levels	22. Use existing on-site information to inform judgement (e.g., site board/ letting signs). (Supplement with further desktop analysis as required.

Appendix 3 – List of sites assessed using the Pro-Forma

A3.1 The following sites underwent a full assessment using the Pro-Forma:

- 474 Cowley Road (Former Powell's Timber Yard)
- 496 Cowley Road
- 79-83 Temple Road
- ARC Oxford
- A.W. Clarke (Engineering) Ltd, Sandford Road
- Ashville Way Industrial Estate, Watlington Road
- Beaver House, Hythe Bridge Street
- Bossoms Boatyard
- Botley Road Retail Park
- Chiltern Business Centre, Garsington Road
- Churchill Hospital
- County Hall, New Road
- County Trading Estate, Watlington Road
- Cowley Marsh Depot
- Dairy Depot, Old Abingdon Road
- Eastpoint Business Park
- Fenchurch Court, Bobby Fryer Close
- Fire Station, Rewley Road
- Former Builder's Yard (Blanchford Building Supplies)
- Harcourt House, Marston Road
- Horspath Industrial Estate, Pony Road, Horspath
- Huw Grays (formerly Buildbase), Watlington Road
- Island Site, Park End Street
- John Radcliffe Hospital
- Jordan Hill Business Park
- Light Industrial Units, Green Road
- MINI Plant Oxford
- New Barclay House, 234 Botley Road
- Newtec Place, Magdalen Road
- Nuffield Industrial Estate, Ledgers Close
- Nuffield Orthopaedic Hospital
- Old Road Campus
- Osney Mead
- Oxford Bus Company, Cowley House, Watlington Road
- Oxford North
- Oxford Town Hall, St. Aldate's
- Oxford Trade Centre, Harrow Road
- Oxford University Press, Greal Clarendon Street
- Oxpens

- Radcliffe Observatory Quarter (ROQ)
- Salter Brothers Ltd, Meadow Lane
- Storage Yards, Binsey Lane
- The Gallery, 54 Marston Street
- Oxford Science Park
- Oxford Trade City and Network Oxford
- Unipart site
- University of Oxford Science Area and Keble Road Triangle
- Warneford Hospital
- Wood Centre for Innovation

Appendix 4 – Final scores for assessed sites

Name/ Address	Ward	Site Area (ha)	Final Score
474 Cowley Road (Former Powell's Timber Yard)	Donnington	0.3	34
496 Cowley Road	Donnington	0.3	36
79-83 Temple Road	Temple Cowley	0.5	32
AW Clarke (Engineering) Ltd, Sandford Road	Littlemore	0.3	32
ARC Oxford	Temple Cowley	35.4	47
Ashville Way Industrial Estate, Watlington Road	Blackbird Leys	1.3	40
Beaver House, 28-38 Hythe Bridge Street	Carfax & Jericho	0.30	39
Bossoms Boatyard, The Towing Path, OX2	Osney & St Thomas	0.3	34
Botley Road Retail Park, Botley Road	Osney & St Thomas	8.8	41
Chiltern Business Centre, Garsington Road	Blackbird Leys	0.6	37
Churchill Hospital, Old Road, Headington	Churchill	22.7	46
County Hall, New Road	Osney & St Thomas	0.3	40
County Trading Estate, Watlington Road	Blackbird Leys	9.7	42
Cowley Marsh Depot, Marsh Road	Temple Cowley	1.7	34
Dairy Depot, Old Abingdon Road	Hinksey Park	0.8	32
Eastpoint Business Park, Sandy Lane West	Littlemore	1.5	38

Name/ Address	Ward	Site Area (ha)	Final Score
Fenchurch Court, Bobby Fryer Close, Watlington Road	Blackbird Leys	1.2	41
Fire Station, Rewley Road	Carfax & Jericho	0.5	35
Former Builder's Yard (Blanchford's) 59 Windmill Road, Headington	Headington	1.0	32
Harcourt House, Marston Road	Headington Hill & Northway	1.1	33
Horspath Industrial Estate, Pony Road	Blackbird Leys	8.3	40
Huw Grays (Formerly Buildbase), Watlington Road	Blackbird Leys	2.2	36
Island Site, Park End Street/ Hythe Bridge Street	Osney & St Thomas	0.7	36
John Radcliffe Hospital, Headley Way	Headington Hill & Northway/ Headington	27.8	37
Light Industrial Units, Green Road	Quarry & Risinghurst	1.5	36
MINI Plant Oxford	Blackbird Leys	82.1	38
New Barclay House, 234 Botley Road	Osney & St Thomas	0.3	41
Newtec Place, Magdalen Road	St Marys	0.4	36
Nuffield Industrial Estate, Ledgers Close	Littlemore	1.7	39
Nuffield Orthopaedic Hospital	Churchill	8.4	42
Old Road Campus	Churchill	6.4	44
Osney Mead	Osney & St Thomas	17.8	38
Oxford Bus Company, Cowley House, Watlington Road	Blackbird Leys	1.6	38
Oxford North	Cutteslowe & Sunnymead	16.4	38
Oxford Science Park	Littlemore	27.1	49
Oxford Town Hall	Holwell	0.3	39

Name/ Address	Ward	Site Area (ha)	Final Score
Oxford Trade Centre, Harrow Road	Blackbird Leys	0.8	38
Oxford University Press, Great Clarendon Street	Carfax & Jericho	2.1	42
Oxpens, Oxpens Road	Osney & St Thomas	6.3	37
Radcliffe Observatory Quarter, Woodstock Road	Walton Manor	4.2	45
Salter Brothers, Meadow Lane site	Donnington	1.3	35
Storage Yards, Binsey Lane	Osney & St Thomas	0.4	30
The Gallery, 54 Marston Street	St Marys	0.3	36
Trade City and Network Oxford, Sandy Lane West	Littlemore	2.8	37
Unipart site	Watlington Road	30.6	36
Units 1-4, 385 Cowley Road	Donnington	0.3	32
University of Oxford Science Area and Keble Road Triangle	Holywell/ Walton Manor	12.4	37
Warneford Hospital	Churchill	8.8	41
Wood Centre for Innovation	Quarry and Risinghurst	0.8	40

Background paper 005a

Title: Green Infrastructure

This paper addresses the green infrastructure network, including the protection of green spaces and other features like trees, as well as the provision of new green infrastructure in development.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
SA Objective(s): 7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all. 10. To conserve and enhance Oxford's biodiversity.
SEA theme(s): Landscape, human health, biodiversity, flora, fauna.

1. Introduction	2
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	4
Other relevant plans and programmes/strategies	5
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	6
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	10
5. Key Issues addressed through the Local Plan 2045	12
Introduction.....	12
Policy Approach to Green Infrastructure	12
Establishing the Green Infrastructure network hierarchy	13
Identifying spaces within the Core Network.....	14
Identifying additional supporting spaces in the GI network.....	16

Enhancing and providing new Green Infrastructure in Oxford.....	17
Urban Greening Factor for major development	18
Appendix A – Regulation 18 Policy options sets	22
Policy options set 005a (draft Policy G1): Protection of GI network and green features	22
Policy options set 005b (draft policy G2): Enhancement and provision of new GI features....	27
Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor.....	31

1. Introduction

- 1.1 The green infrastructure network is an important issue to be addressed in the new Local Plan. There are various definitions used for the term Green infrastructure (GI); however, the 2024 [National Planning Practice Framework](#) (NPPF) defines it as:

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

- 1.2 The [Planning Practice Guidance](#) sets out that green infrastructure includes both green and blue spaces and can include:

A range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.

- 1.3 Green infrastructure forms an essential part of the city's natural capital which is the various elements of the natural environment which provide us with valuable goods and services. An important feature of GI is its multi-functional nature, which means that it can perform a range of services from which people can benefit and which can contribute positively to achieving various policy objectives. Such services include, supporting physical and mental health and wellbeing; encouraging investment and regeneration; building resilience to climate change; providing space for nature and supporting biodiversity; reducing flood risk; and contributing to improved air quality (Table 1.1). The Council must balance competing development needs in the city whilst also ensuring that it plans in a positive way for the creation, protection, and enhancement of Oxford's green infrastructure so that these various benefits can be maximised for the city in the future.

Table 1.1 - The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

Environmental
• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaptation, e.g., through providing flood and soil erosion protection, carbon sequestration and storage, urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking
Social/Health and Wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive safe spaces for people to enjoy and improve social contacts – a key component of ‘liveable’ towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land property values. • Supports sustainable homes and communities e.g., through providing local food, building materials, encouraging low carbon lifestyles e.g., through well-connected attractive travel walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaptation.

- 1.4 An important component of Oxford’s Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network

is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework

- 2.1 Highlights that planning for green infrastructure can help deliver a variety of planning policy objectives. Specifically, **para 20** states that green infrastructure is an element which local planning authorities should address in their strategic policies. **Para 164 and 199** highlight that green infrastructure should be considered as important mitigation measures for the impacts of climate change and poor air quality. Further references are made to green infrastructure elsewhere in the document:
- **Para 35:** plans should set out the development contributions expected in association to green infrastructure and set out the levels and types required.
 - **Para. 96:** Provision of safe and accessible green infrastructure is one example of a way that local authorities can enable and support healthy lifestyles.
 - **Para. 135:** developments should optimise the potential of the site to accommodate and sustain an appropriate amount/mix of development including green and public space.
- 2.2 With regard to open space, **para 103** of the NPPF sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and climate change, and that local plan should assess what open space is needed and make provision to accommodate this. **Para 104** sets out strict conditions for when loss of open space, sports land/buildings and pitches can be lost.

Planning Practice Guidance and National Design Guide/Model Design Code

- 2.3 The online Planning Practice Guidance has a dedicated page for the [natural environment](#) including green infrastructure and biodiversity considerations. Paragraphs 4 to 8 include guidance on why green infrastructure is important and how local plans should take a strategic approach to addressing it including use of strategic policies to identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. Open space is addressed in separate guidance and sets out how this should be taken into consideration in Local Plans to support health and wellbeing.
- 2.4 In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and

habitats; 'proportionate' information and assessment required on biodiversity impacts at all stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

- 2.5 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

National Parks and Access to the Countryside Act 1949

- 2.6 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Small Holdings and Allotments Act 1908

- 2.7 This places a duty on local authorities to provide allotment gardens where demand for them exists. Requests for allotments submitted by at least six local people must be taken into account when considering whether demand exists. Allotment provision is also subject to other legislation arrangements less related to the planning process, including the Allotments Acts of 1922, 1925 and 1950.

Oxford Local Plan 2036

- 2.8 The topic of green and blue infrastructure in the city is addressed in detail in chapter 5 of the adopted Local Plan, 'Protecting and enhancing Oxford's green and blue infrastructure network', through policies G1 to G8. As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network.

Other relevant plans and programmes/strategies

Natural England Green Infrastructure Framework (2023)

- 2.9 The [Green Infrastructure Framework](#) was launched by Natural England in 2023. It is a collection of policy tools and documents whose purpose is to assist local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development. The framework is structured around a number of key components that include a set of national standards on quantity/quality of GI; mapping; planning and design guidance. Whilst the Green Infrastructure Standards have no statutory power, they are intended to support better planning for good quality GI and help to target the creation or improvement of GI, particularly where existing provision is poorest. When supplemented with local knowledge

and evidence, Natural England advise that they can be used to help set local targets for provision.

Oxford City Council Green Spaces Strategy 2013-2027

- 2.10 The strategy focuses on green space that is freely available to the public for informal recreation, allotments and play irrespective of who the land is owned by.

Oxford City Council Playing Pitch Strategy 2022-2036 (and emerging update)

- 2.11 This strategy is a needs and evidence-based document that is aligned with the adopted Local Plan, and it seeks to ensure that the city has a good supply of well-managed, well-maintained and efficient playing pitches and other outdoor sports facilities that would help to encourage residents to maintain healthy and active lifestyles. Whilst there was no legal requirement for a Playing Pitch Strategy, the Council had opted to develop one as one of the ways to promote healthier living and reduce inequality. The Strategy is intended to be reviewed every year and refreshed on a five yearly basis.
- 2.12 An update to the Council's Playing Pitch Strategy is currently in progress, which will cover the city to 2045. An interim update note to inform the new Local Plan, which brings together emerging analysis and findings from Strategy's development with an early picture of existing and future demand for pitches, has been published alongside the Regulation 19 consultation. The full strategy is expected to be completed later in 2026.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

- 3.1 The Green Infrastructure study (2022) identified that Oxford's green spaces are providing a variety of roles that support health and wellbeing of residents and ecosystems. With regard to publicly accessible green spaces, the analysis highlighted that whilst there is a fairly even distribution of green spaces across the city in general meaning that accessibility for residents to walk or cycle to green spaces was good, however, there are inequalities in distribution of certain types of green spaces resulting in gaps in accessibility for specific types of green space. Whilst it is very challenging to establish significant new green space to counter these gaps, additional loss of open space in certain areas could exacerbate these accessibility problems or establish access deficits for other types of green space like parks or outdoor sports. In summary, the report found that:
- Allotments: Gap in access in the eastern part of the city centre (low deprivation) (however much of this area is university land), and smaller gaps in the north (low deprivation) and west (pocket of high deprivation) of the study area.
 - Amenity green space: large gaps in access in the north and east of the city (low levels of deprivation, and small gaps in the south in Littlemore and Temple

Cowley (high levels of deprivation). However, the good access to parks and recreation grounds across the city mitigates this.

- Parks and recreation grounds: Good access across the city. Small gap in the north in Wolvercote (low levels of deprivation) but there is access to amenity green space and accessible natural green space in this area, which helps to mitigate this gap in access (although it is acknowledged that these types of spaces do not typically offer the same level of facilities that a park might).
- Accessible Natural Green Space (15-minute walk time buffer): large gaps access in Cowley/Temple Cowley in the south and in the North (around Sunnymead), both in areas with relatively high levels of deprivation.
- Play space: for children's play spaces, gaps in access in the city centre (although much of this area is university land) and North Oxford (low levels of deprivation). There is also a gap in the south in Iffley (IMD decile of 6). For youth play spaces, small gaps in access in the centre and north of the city centre (in areas of low deprivation).

3.2 Informed by more than 200 site visits, the report also looked at quality and multi-functionality of the open spaces (helping to assess wider benefits they play to the local areas). It found that:

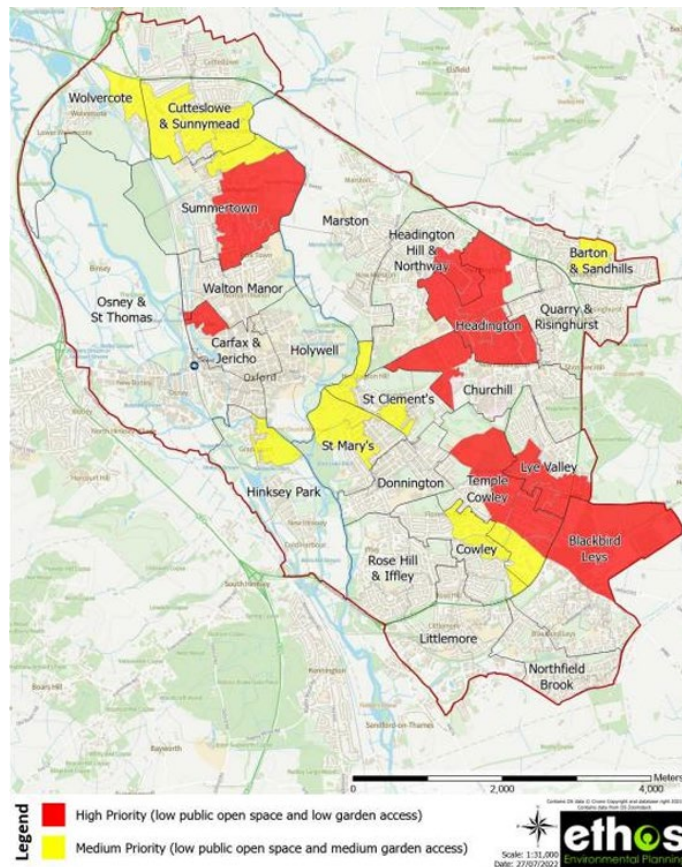
- The majority of public open spaces in the city (84%) were currently of good or excellent quality, however there are opportunities to improve quality on some spaces, with 16% assessed as fair or poor quality.
- Generally, the highest quality sites fall within areas of lower levels of deprivation, however there are exceptions to this. The wards with generally higher numbers of poorer scoring sites are Marston, Headington Hill and Northway, Quarry and Risinghurst, Barton and Sand Hills, Churchill and Lye Valley.
- Larger/destination parks within the city are high quality sites providing multiple functions and are important sites for tourism and built/natural heritage.
- Sites delivering very low numbers of functions tend to be private spaces and amenity green spaces. Smaller sites, including other typologies, typically delivered fewer functions (though not in all instances) and there are areas with lower levels of multifunctionality in the south and east of the city (which generally corresponds with areas of high deprivation).
- For lower scoring sites, common issues appeared to be low biodiversity value, poor access (e.g. path quality and overgrown vegetation), management of soft landscaping, dog fouling, litter and lack of signage.

3.3 A particular type of open space that provides an important role for health and wellbeing is that of playing pitches. The Council's existing strategy identified the importance of protecting pitches and indicated that any losses need to be sufficiently mitigated through sufficient re-provision as there is not generally considered to be a surplus in the city. A

similar picture is emerging from the ongoing update to the Council's Playing pitches strategy when existing provision is considered against current population demands and future demands. Other mechanisms could also play a role in improving access such as enhancing existing pitches and associated facilities, as well as community use agreements.

- 3.4 Beyond public open spaces, there are a variety of greenspaces in the city which are not freely accessible to public, yet still make an important contribution to the overall green infrastructure network. For example, many of the schools and colleges in the city have their own playing fields and outdoor spaces which play an important role in the health and wellbeing of the young people and children in attendance and add to the sense of place locally (sometimes playing an important role in heritage setting particularly around the colleges).
- 3.5 According to land use data (2018), around 19.9% of Oxford's land use is classified as residential gardens. There is diversity in the amounts of green infrastructure that is present across Oxford gardens and policy has little control over how they are managed but many of these spaces nevertheless are an important location for green assets like trees in the city. Whilst only being accessible to individuals within the home, private gardens offer an important outdoor space for socialising and being active. Of course, there is not an equal distribution of this type of space across the community, and many individuals, particularly those living in flatted developments or house shares, may not have any privately accessible green space at all.
- 3.6 The GI study found that some of areas of the city with the lowest amounts of private garden are located in areas with lowest access to public open space. In these locations (highlighted in red and yellow in Figure 3.1), there is potential for existing open space to be under greater pressure from local residents. Notably, some of these locations are also areas of higher deprivation which could exacerbate existing health inequalities where residents are not able to benefit from sufficient outdoor space.

Figure 3.1 - Bivariate map showing areas of the city with lowest public open space in combination with lowest garden access (red are lowest)



- 3.7 Beyond green spaces, the city hosts a range of other important green infrastructure features such as trees. Trees are present in our greenspaces but also help to break up the urban fabric of roads and streets throughout the city. Many of these trees have been protected for their high amenity value through Tree Preservation Orders (TPOs) however there are a greater proportion that have not (and TPO designation is not the only determiner of high-quality trees). Oxford is also home to several areas of ancient woodland, including Brasenose Wood and at Shotover Country Park. The [Oxford Urban Forest Strategy](#) estimates that the urban forest in Oxford contains approximately 248,000 trees which equates to a total canopy cover of 22.3%; meanwhile separate analysis that used a slightly different methodology conducted for the GI study concluded with a similar figure of 21.02%. This is above the 20% minimum recommended by Forest Research for urban areas which is a positive, however, as Table 3.1 shows, canopy cover does vary across the city with some of our more deprived wards featuring some of the lowest amounts of coverage (e.g. Blackbird Leys).

Table 3.1 - Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived)
Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	1
Churchill	28.1	3
Cowley	19.71	4
Cotteslowe & Sunnymead	31.02	4
Donnington	22.28	2
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	4
Lye Valley	22.74	5
Marston	22.59	3
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	2
Summertown	26.26	6
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

3.7 The GI network also includes a range of blue spaces including the two rivers (Cherwell and Thames), a number of streams and smaller water courses, as well as the canal and other waterbodies like ponds and lakes. These features act as important corridors through the city and in between green spaces, providing habitat for wildlife and connectivity for people. The Water Cycle Scoping Study will discuss the current environmental conditions of the main water courses, which continue to be challenged by a range of pollutants such as from agriculture, urban runoff and sewer discharges.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 The currently adopted Local Plan 2036 will maintain protection of the network of green infrastructure across the city, alongside national policy (which affords its own strict protections for open space). Other legislation outside of planning that protects certain green spaces like allotments, as highlighted in section 2, will also continue to apply.

- 4.2 Nevertheless, a growing population means that there is likely to be increasing demand for outdoor sports provision and public open spaces in the long term. Ongoing development pressure as the city grows means that these spaces will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this can lead to a deterioration of these spaces. The quality of existing spaces already varies across the city, without additional investment, facilities associated with some green spaces may deteriorate further, exacerbating this uneven distribution in quality.
- 4.3 Different types of green spaces could face different challenges. In areas of the city where access to private gardens is reduced, there is likely to be particular demand on public spaces like parks and smaller amenity green areas for people to socialise and undertake physical activity, as well as allotments (many of which already have waiting lists).
- 4.4 Some types of GI will continue to be protected from inappropriate development through other mechanisms outside of the Local Plan, for example some trees benefit from Tree Preservation Orders (TPOs) and conservation area protection. Formal allotments benefit from protection that can only be removed via application to the secretary of state. Some of our parks and gardens benefit from heritage protection as Registered Parks and Gardens.
- 4.5 Blue spaces like the rivers and streams are already facing pressures from pollution as well as historic development of their banks. It is likely water quality issues relating to sewage pollution will continue without additional investment from Thames Water into the Wastewater Treatment Works, although with sufficient upgrades as are proposed, these issues could then improve. Other sources of pollution that are not within the control of the Local Plan are likely to continue without separate actions in the relevant areas such as changes to agricultural practices. Without a new Local Plan there could be additional pressure for developing on open spaces along embankments, particularly beyond 2036, which could have impacts on the water courses and exacerbate the challenges they face.
- 4.6 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).

5. Key Issues addressed through the Local Plan 2045

Introduction

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.
- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Policy Approach to Green Infrastructure

- 5.3 The policy approach to Green infrastructure (GI) is guided by recognising and protecting a network of green features across the city and in order to harness the ability of GI to provide multi-functional benefits to the city's inhabitants and the wider environment. The intention is to ensure that new development preserves our highest quality GI and avoids unnecessary harm to it, whilst also ensuring that new GI is an integral component of the design of development. Three interrelated policies drive this approach as is shown in Figure 5.1.

Figure 5.1: The approach to green infrastructure in the new Local Plan



Establishing the Green Infrastructure network hierarchy

- 5.4 Oxford's Green Infrastructure (GI) network is made up of a variety of green and blue spaces across the city which provide multiple benefits to the wider natural environment and the health and wellbeing of the people of Oxford. Whilst national policy already includes protections for open space through the NPPF, which is expanded upon in the associated guidance, the Local Plan policy G1 includes additional protections and helps define the network.
- 5.5 Whilst the approach to all of the green spaces of the network is one of resistance to their loss or harm in line with national policy, the Local Plan assigns the spaces of the network to different levels of protection with the hierarchy set out in policy G1. The hierarchy is as follows:
- **Core:** Spaces within the highest level of the hierarchy benefit from the strongest level of protection meaning loss would not be deemed acceptable in any circumstance because their location is fundamental to the benefit they provide and to supporting the functioning of the wider network and addressing wider sustainability issues.
 - **Supporting:** Spaces within the second level of the hierarchy which also play an important role in supporting the network and addressing sustainability issues; however, specific location is not as fundamental and loss could be acceptable where this is reprovided elsewhere in the network.
 - **All other spaces:** Not identified through policy G1 and do not have additional

protections applied on them via the Local Plan. Applications would defer to the protections which already exist through national policy – e.g. meeting the tests for loss of open space as set out in the NPPF.

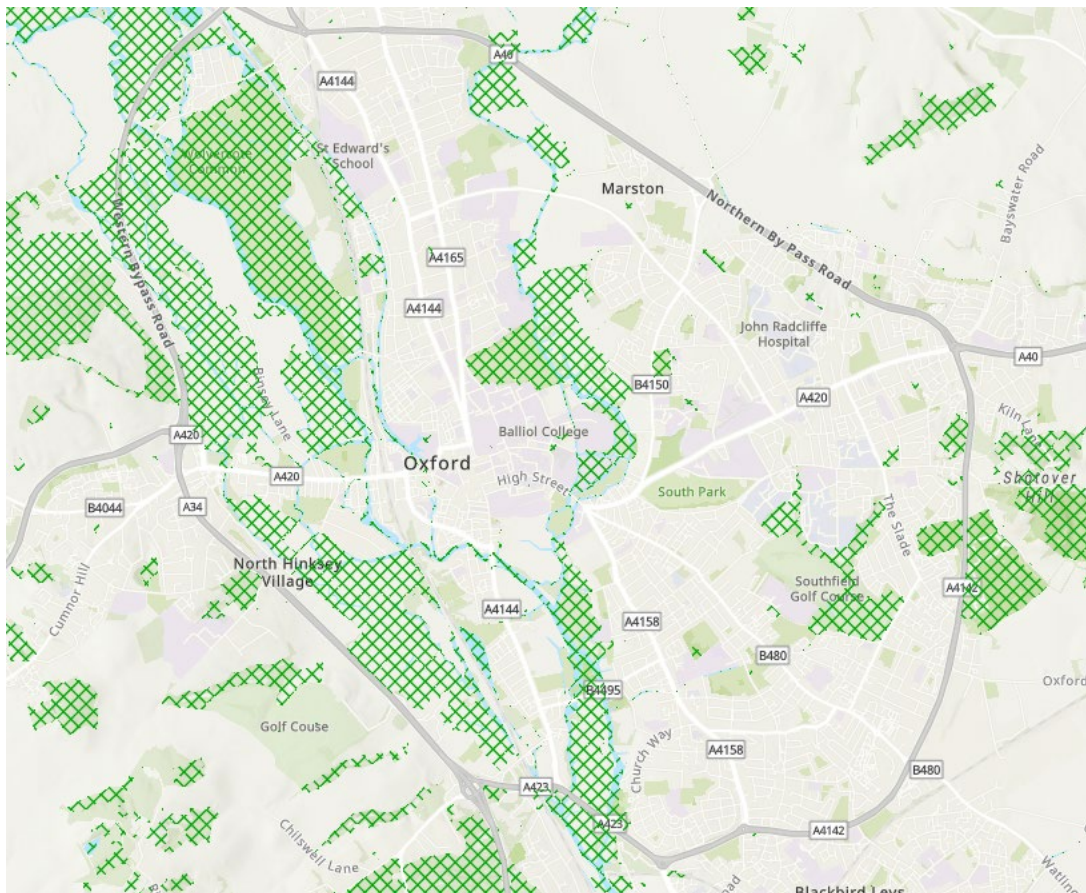
- 5.6 This approach is considered to be a reasonable and pragmatic way of responding to the constrained nature of the city and recognising the varying clusters of functions different spaces provide to supporting the city-wide network. It takes a strong line on protection of many spaces across the city, affording higher levels of protection to those areas whose value derives significantly from their current geographic location in order to perform these functions – value which could not be easily replicated elsewhere were they to be lost.
- 5.7 Equally, it acknowledges the demands on space that the city is constantly subject to and it recognises that to meet the wider vision for the city in 2045 and meeting the other Local Plan objectives, sometimes other types of uses may be necessary. Whilst the protection of the supporting tier also exceeds national policy, it recognises that these spaces can provide more limited value to the overall network where they currently preside and that these could potentially be reprovided in another part of the network without irreparably reducing quality of GI in the city where a more fitting use can be demonstrated for the site.

Identifying spaces within the Core Network

- 5.8 Several typologies of green spaces which were automatically assigned to the core network because these typologies provided a clear role or unique set of functions/benefits that other typologies could not and in a location that would be challenging to reprovide in the short term as part of the development process. These typologies included:
- allotments for their role in food growing and social interaction, particularly for those without private gardens (also protected through additional national legislation),
 - churchyards/cemeteries because of their important setting for heritage assets and burial spaces.
 - ecological sites protected under a local or national designation due to their specific ecological value for the habitats in these areas to supporting biodiversity.
- 5.9 Access to a park that can provide multiple types of facilities and functions to meet recreational needs was also considered to be an important component to the GI network, particularly in supporting the needs of residents with limited private open space but also more generally for meeting a range of health needs. The GI study identified a number of ‘destination’ parks which are of a significant size (varying from 7ha to 122ha), which formed the basis of a list of sites to be included in the core network. Council officers subsequently reviewed and added to this list to ensure some additional parks were protected across the city including where they were part of a limited offer of alternative green spaces in areas of significant deprivation.

- 5.10 Other typologies of open space with a more heterogenous character required a more nuanced approach, particularly where they were more variable in the types of functions they provide. Unlike spaces with a more singular or primary function such as an allotment, or cemetery, other spaces such as the remaining parks as well as areas of natural green space can vary more greatly in character and the role they play in the network sometimes. There are a range of parks and gardens in the city for example and some have an important heritage status being designated as Registered Parks and Gardens; whilst some are particularly large and serve a wide area of the community; others are much smaller with limited features and potentially congregated in areas with an abundance of other types of green space. This variation necessitated further analysis to designate certain spaces into core and others into supporting.
- 5.11 A key driver in identifying and protecting a network of core spaces across the city was the understanding that many of their benefits need to be retained in situ and are very challenging to relocate. In this context, officers have considered a number of specific factors relating to key multi-functional benefits that arise from the situation of certain spaces and broadly fall under three topics: heritage, biodiversity and climate change. The remaining spaces not already within core network were assessed in terms of their contribution to these benefits and allocated to core where they met the following criteria:
- Biodiversity – has the space been identified as containing a significant amount of core habitat (more than 50% of the site) within the Oxfordshire Nature Recovery Network and is it also connected to other spaces and clearly forming part of a wider wildlife corridor through the city?
 - Heritage – is it a Registered Park and Garden or has the space been identified on the Oxford Heritage Asset Register as a local green feature of significance?
 - Climate change – has the space been identified as containing a significant amount of land within flood zone 3b (more than 50% of the site) and therefore acting as important source of flood storage?
- 5.12 Appendix B of this background paper (contained in a separate document) details all sites added into the core network and the rationale for why they have been assigned to this level of the network.
- 5.13 For reference, the Oxfordshire Nature Recovery Network (Figure 5.2) was identified in advance of work on the Local Nature Recovery Strategy and the Council has utilised it in informing core designation in the GI network because it takes into account a wider variety of biodiversity considerations than the LNRS, including areas of ecological interest such as Sites of Special Scientific Interest, Local and National Nature Reserves, Wildlife Sites (Local, District, and City), as well as various reserves, woodlands, TVERC's priority habitat mapping and other protected sites. The Council has cross-referenced with the Oxfordshire County Council LNRS mapping to ensure any identified existing sites of particular importance for biodiversity are also incorporated.

Figure 5.2: TVERC Nature Recovery Network (NRN) core zones – which contribute to designation of some ‘core’ spaces (where they also clearly form part of a wider ecological corridor), where the core zone exceeds 50% of the site Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.).



Identifying additional supporting spaces in the GI network

- 5.14 There were a number of other types of green space which did not meet the standards for core protection set out in the preceding paragraphs but were still deemed important enough to be classified as supporting spaces to the network. Typically, these were spaces which could feasibly be reprovided to another part of network if necessary and were typically of a more limited wider benefit to the area in terms of functionality or public access but still played some function that supports the wider area and that would need to be replaced.
- 5.15 Sports pitches, for example, are an important asset to supporting health and wellbeing through providing formal spaces for recreation. Whilst reprovision of any losses will often be an important consideration (which the supporting tier of the network would require),

these spaces typically offer fewer wider benefits to warrant core protection (unless they met one of the additional considerations in para 5.11).

- 5.16 A number of spaces with no fixed role, including amenity spaces and private outdoor spaces, were also added to the supporting tier where they were of a significant enough size. As was found in the 2022 GI study, typically larger areas of green space are able to perform a wider variety of positive functions for the city than smaller ones, though there may be exceptions. These spaces can make a valuable contribution to greening the urban realm in general and can have potential for enhancement in future.
- 5.17 Amenity green space (areas of informal grass with limited features) were included within the supporting tier where they exceeded a size threshold of 0.15ha, which was deemed significant enough to be of benefit to the local environment. Private green spaces were included within the supporting tier based upon a size threshold, however, due to their restricted public access benefit this was only where they exceeded a size threshold of 0.3ha.

Enhancing and providing new Green Infrastructure in Oxford

- 5.18 A key driver behind the policies of the new Local Plan is encouraging green and blue infrastructure to be considered with equal importance and value to more traditional grey infrastructure provision. Whilst policy G1's hierarchy of protection seeks to ensure that we retain our highest quality GI in the city and supports the objective of retaining opportunities to enhance what we have, policies G2 and G3 then set out the framework for how we expect to see enhancement and new provision take place.
- 5.19 Principally, policy G2 requires applicants to consider not just the provision of features on the site but also how they connect in with features around the site to deliver greater interconnectedness with the wider GI network. This is important for building resilience into the GI network, reducing fragmented landscapes and supporting movement of people and wildlife across the city. Equally, policy G2 sets out the importance of a design rationale which looks for ways to secure multi-functionality. It sets out various functions that are considered important such as supporting biodiversity, building climate resilience and providing spaces for people, which should guide design beyond purely aesthetic concerns. To be most effective at fulfilling multi-functional roles, these have to be taken into account in informing the design of green spaces/features from the beginning, rather than as an afterthought. Where re-provision is required to accord with loss of protected space under policy G1 – the requirements of G2 guide how we expect the re-provided GI to be delivered.
- 5.20 There are some other elements to the policy that address more specific situations. For example, recognising that our blue spaces are an integral component to the city's landscape and that in places the connection with our watercourses has been degraded over time which can lead to negative impacts for the water environment, Policy G2 also

sets out specific expectations in relation to development that occurs adjacent to watercourses. It sets out that new development adjacent to these spaces incorporates a sufficient buffer to mitigate negative impacts on them and also help to enhance the environment in these areas. Where the land alongside our watercourses has already become urbanised the policy requires that buffers ideally be reinstated.

- 5.21 The policy also sets out requirements for new open space on larger developments. Whilst our analysis of the city through the GI study 2022 and of the existing development sites over the Local Plan period suggest that opportunities for the creation of large-scale new open space is limited by various constraints, open space is an important component of healthy, well designed development and where possible this needs to be incorporated within the site layout of larger schemes. The new Local Plan therefore retains the existing requirement for 10% open space to be delivered on larger developments of 1.5ha and above.
- 5.22 Where green features are included in a development, it is important to recognise that these are live components of a design which are subject to varying levels of ongoing care and maintenance. A successful development is one that considers these longer-term needs and plans accordingly for them as part of the design process. Certain features like trees have a crucial establishment window which requires more intensive care and attention in terms of watering to ensure the longevity of these features going forward. Meanwhile, other features like green walls and roofs require more regular watering and maintenance throughout their lifetime to avoid failure due to their more exposed and unnatural planting location. With climate change and longer hot/dry conditions in future these demands are likely to increase. The policy therefore sets out specific requirements for ongoing maintenance/management arrangements which need to be included as part of the applications, along with conditions that will be set for replacement of failed specimens during the establishment period post- construction.

Urban Greening Factor for major development

- 5.23 As has already been identified, Oxford's constrained nature makes the delivery of new green spaces of notable size within the city boundary challenging to achieve. There are also parts of the city that are more densely developed and deficient in green spaces in terms of their size, accessibility and quality. It is therefore crucial that in areas where new development comes forward, all opportunities are taken to maximise the amount of greening within the site. This also supports other objectives such as making space for nature and building resilience to climate change (through reducing surface water flood risk and risk of overheating in summer). Whilst the scope of policy G2 sets out principles and requirements in this regard that apply to all scales of development, policy G3 introduces additional requirements of major development in the city in the form of the Urban Greening Factor (UGF) assessment.

- 5.24 The UGF assessment process produces a score for the proportion of urban greening in comparison to the total area of a given development site. The calculation focuses on the types of surface cover used within the landscape of the site and is measured for the existing situation and post development conditions following building and landscape proposals. Each surface cover type is assigned a weighting factor (between 0.0 to 1.0) that reflects its environmental and social value in urban greening; its functionality in providing ecosystem services, including improving permeability; and its benefit in supporting biodiversity and habitat creation.
- 5.25 The benefit of the UGF process is that it provides a simple means of quantifying the changes in amount and type of green surface cover delivered through a development in a transparent way. Whilst certain types of more natural surface cover are incentivised through the UGF, applicants have flexibility in how they meet the policy requirements for post- development score and can freely pick the proportions of different surface cover types to best fit their site's constraints. This is particularly important in addressing the constrained nature of many sites in the city, balancing out the space demands of various policy requirements in the Local Plan, and viability challenges of delivering development.
- 5.26 Whilst the UGF process involves the use of an area-based metric which has similarities to the Statutory Biodiversity Net Gain metric that applicants will be required to complete as part of Biodiversity Net Gain (BNG), the two tools have different roles in meeting the Local Plan's objectives. The BNG metric works as an uplift in score for a site (a 10% improvement on current score) and is focused primarily on habitat creation for biodiversity. Meanwhile, the UGF sets out a minimum target and is focused on delivering multi-functional green features which could provide for biodiversity but also many other benefits. On particularly urbanised sites lacking in existing habitat, a 10% uplift in a low score as required by BNG may have relatively limited effect, whilst the UGF instead requires sites to meet a minimum score based upon the combination of surface covers as a proportion of overall site area. Meeting the UGF requirements can of course support biodiversity objectives of the Statutory BNG Metric (and vice versa).
- 5.27 In formulating the specific requirements of policy G3 the Council has adopted the list of surface cover types and individual scores recommended through Natural England's guidance, which applicants will be required to utilise in their assessments (Table 5). Natural England devised these different weightings in order to maximise multi-functionality of green infrastructure in urban areas and benchmarked them against their Environmental Benefits from Nature tool which assigns values to different habitats based on the ecosystem services they provide. As the intention is to provide a consistent approach across England and in discussion with Natural England, the Council deemed that it was unnecessary to amend the weightings further.

No.	Surface Cover Type	Factor
1	Semi-natural vegetation and wetlands retained on site (including existing / mature trees)	1.0
2	Semi-natural vegetation established on site	1.0
3	Standard / semi-mature trees (planted in connected tree pits)	0.9
4	Native hedgerow planting (using mixed native species)	0.8
5	Standard / semi-mature trees (planted in individual tree pits)	0.7
6	Food growing, orchards and allotments	0.7
7	Flower rich perennial and herbaceous planting	0.7
8	Single Species or mixed hedge planting (including linear planting of mature shrubs)	0.6

Table 5: A selection of the surface covers and their weightings from the Natural England UGF tool – the full list is included in the Appendix of the Local Plan – any updates will be published in the Green Infrastructure and Biodiversity TAN in future.

- 5.28 In relation to the specific targets new development will need to meet in Oxford, whilst Natural England also set out recommendations in this regard (e.g. 0.4 for residential and 0.3 for non-residential), an additional assessment of the local context and other aspirations in the Local Plan have helped informed the targets for policy G3. Sites in Oxford are particularly constrained by a variety of pressures whilst the Local Plan also includes a variety of policies which will put additional demands on the layout of development sites. As such, high level testing of the UGF assessment was carried out on proposed allocated sites in the Local Plan to understand how these sites currently score and what could practically be achieved. This testing process has led to slightly reduced targets for major development (0.3 for residential sites and 0.2 for non-residential), except for wholly greenfield sites. The policy also includes requires that proposals should not result in a reduction in the baseline score, meaning sites that already exceed these targets (e.g. greenfield), will need to maintain these scores as a minimum (no net loss).
- 5.29 On wholly greenfield sites, the policy does acknowledge that no reduction in baseline score may not always be feasible, particularly where there are limited opportunities to enhance parts of the site further to mitigate losses elsewhere on the site. Applicants will need to justify where this is technically not feasible, such as by setting out how they have tested different layouts of the site. These sites have a higher minimum target that must be met, however, in recognition of the higher level of greening they are starting from. Other policies, such as Policy G1 will also remain relevant, meaning higher quality elements on the site, such as

mature trees should be retained regardless (subject to the requirements of that policy).

- 5.30 The testing process on allocated sites enabled officers to identify existing natural features on site, particularly those that are of sufficient quality to contribute to the UGF score and compatible with the design-led approach to writing the allocations policies. Whilst the overarching targets of policy G3 apply to all sites, where applicable, such features have been highlighted in the allocation policy as part of the overall guidance on natural features and placemaking. They are written in such a way as to not be unduly prescriptive, which should give allowance for applicants to explore appropriate design solutions and engage with council officers.
- 5.31 The overall approach is considered to be most pragmatic for the local circumstances of the Oxford, given that it is a new policy addition which is based on relatively new UGF standards from Natural England. It will ensure that green infrastructure provision is appropriately considered in all major development (with encouragement for its application on other types of development), that provision is quantified helping to understand net change and achieves a realistic minimum baseline, whilst also leaving flexibility for applicants to tailor their approach to the particular circumstances of their sites. The approach can be tailored in future iterations of the Local Plan based upon how the new approach performs.

Appendix A – Regulation 18 Policy options sets

Policy options set 005a (draft Policy G1): Protection of GI network and green features

- The proposed options set out to protect a network of different open spaces. The options consider the protection of the open space network in a couple of ways, either assigning similar protection to all sites, or identifying a hierarchy of sites with different levels of protection. The options seek to protect the network through one policy, rather than having bespoke policies for each type of space in the network, but there is an option which considers whether additional policies could be applied to different types of spaces. There is also an option for protecting trees, hedgerows and woodland.

Table 1 - Policy options set 005a: Protection of GI network and green features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of	Ensuring that we are protecting a network of spaces and features at various scales will help to ensure that the needs of local residents and the environment are met at various levels. Ensuring spaces are connected, and protected from further fragmentation, can help support quality of these areas and wider nature recovery.	The green infrastructure study has identified that some green spaces and features are of a higher quality than others – performing a more important role in supporting the city than others. Considering the high demands for space in the city in order to meet other objectives, such as providing affordable, quality housing for residents, it may be preferable to protect only the higher quality, strategic spaces, or those with practical opportunities to enhance. This would allow us to release poorer quality spaces for other needs, rather than treat all spaces with the same degree of importance. Careful wording will be needed to ensure this approach clearly fits in with the NPPF wording that protects all

a network means that it would be challenging for them to be replaced elsewhere).	The city is limited in its green infrastructure, particularly open space. Once open space is lost, it can be very difficult to reprovide. Beginning from a standpoint that all spaces are valuable and should be protected in themselves helps to recognise this challenge. Protecting open space regardless of quality recognises that every space has the potential to make an important contribution to health and wellbeing as well as wider sustainability, particularly to the local area.	green spaces unless they are shown to be surplus or can be re provided.
Option b Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in	Gives further clarity than option a, and provides opportunity to identify higher quality, strategic and multifunctional sites and prioritise these for protection over sites that have less adverse impact if lost to development.	Categorising sites may be subjective exercise and run risk of deprioritising spaces that may still bring about benefits.

exceptional circumstances, to permitting development with reprovision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy.		
Option c In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecological sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.	This option could allow bespoke policy approaches to specific types of green space and any unique needs/concerns.	This approach may add a level of confusion where there are protections of a particular category both within and outside of the network (for example some outdoor sports pitches may be a multifunctional part of the network and others may have protection only as outdoor sports).
Option d Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the	Trees perform several important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of	Where high quality trees are already protected by Tree Preservation Orders, additional tree protections could be considered too onerous in the development of particularly constrained sites.

retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.	established trees and to incorporate the planting of new trees. Tree canopy cover often has the biggest impact on setting and as such that correlates to the benefits that trees can bring. Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the City Council having been made aware of them and designating in this way. It is unlikely that all high-quality trees in the city are protected in this way however, thus many will not benefit from TPO protection.	
Option e Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and	This option recognises that there are key areas of open space with value to supporting health and wellbeing in the city. These larger spaces are likely to have more capacity	Green infrastructure works best when thought of as an interconnected network, which this approach would ignore. Smaller spaces and linear features contribute to and enhance larger spaces, as well having an equally important role in supporting day-to-day wellbeing – breaking up urban environment, supporting climate resilience, creating wildlife corridors and encouraging active travel.

outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.	for enhancement than smaller ones too. It would ensure that key areas are identified and protected across the city whilst diverting development pressure away to poorer quality areas or areas that provide less benefit overall.	
Option f Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.	National guidance on GI standards is developing, including the full launch of the Natural England GI Framework later in 2022.	Relying on national standards for green infrastructure provision could risk ignoring local contextual issue and priorities which a local policy can help to address.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options or combinations e.g. option A or B, A+C, B+C, A+B+C, A+B+C+D, A+D, B+D, E, F)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, **7. Green Infrastructure**, and to **10. Biodiversity**. There is also some relevance to criterion **3. Efficient use of land**, as the use of designations and protections that restrict development on greenfield land.

All options are going to score positives for criteria 2, 3, 7 and 10, apart from option g (no policy – defer to national policy/standards) which would score neutral. All other options seek to put in place some form of baseline level of protection on all green spaces, creating designations dependent on the function or type of green space, and restrictions. The differences between

the policies are of degree and extent. The extent of the positive impact of these options will depend largely on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Protection of Green Infrastructure network and features – Policy G1

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of aspects from options **A**, **B**, **C** and **D**. This combination of options establishes the principle of a city-wide connected green infrastructure network made up of spaces and features of different scales and type, that will be subject to varying levels of protection. This approach is considered the most effective way of protecting all public and private green infrastructure in the city from inappropriate development and mitigating the impact on green spaces of development in general. Policy can establish a hierarchy of protection for all green spaces in the city, which can identify spaces that are particularly important to the city in terms of their function, historical significance or local amenity and where needed can ensure levels of protection that go beyond what is stated in national policy. This approach would allow us to set out the specific conditions under which certain types of green space may be lost to development, and measures to mitigate the impact of such losses including re-provision. The approach would also recognise importance of trees and set out expectations for developments that might impact them.

Policy options set 005b (draft policy G2): Enhancement and provision of new GI features

- Green features on sites can be designed in ways that allow them to perform multiple benefits for the local area, e.g. making space for biodiversity, recreation, climate resilience. The policy options in this set consider how opportunities can be maximised for delivering new and improved green infrastructure and securing the various benefits associated with it, whilst cumulatively bringing about a greener and healthier city. They also consider options for securing new open space, though opportunities for this will likely be limited to larger sites.

Table 2 - Policy options set 005b: Provision of new GI features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require green and blue infrastructure features on all new development – guide expectations through tailored requirements in different areas of city or on different scales of site including: i. Compliance with Urban Greening Factor to demonstrate net gain ii. % new open space on larger sites iii. Bespoke guidance on greening within allocations policies.	More bespoke tools would align with the wider spatial approach to the Local Plan and such tools/approaches could be tailored to meet specific needs/challenges in different areas of the city (e.g. areas of deficit, deprivation, with poor air quality, highly urbanised sites). National policy encourages use of such tools as a standard. Such tools can allow for better analysis and more effective design of green infrastructure, assist in practical delivery and better quantification of benefits. With better quantification of green infrastructure, comes the potential for better	Quantifying green infrastructure provision and its benefits can be a subjective process which is not an exact science. There is the potential for any provision of green infrastructure by applicants to be tailored to meet only the bare minimum as required by any such policy (e.g. the minimum acceptable to meet policy), rather than striving to maximise provision or be more innovative. Potential for more complicated/onerous development management process which would need to be addressed with quality guidance.

	monitoring of what is being delivered in a design proposal.	
Option b Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features. Set out principles for what should be included. Leave requirements flexible, to respond to the site's specifics.	Larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city – ensuring these are captured with a requirement for a specific level of open space helps to contribute to new open space provision. Smaller sites in the city are typically more limited in what green infrastructure features they can provide, as such, requiring new provision to be factored into their design, but leaving flexibility in how this achieved, would allow for different proposals to respond in the best way possible for the site. Requiring open space provision on smaller sites could lead to small, unusable	Many developments in the city have historically been on smaller sites and not of the scale large enough to meet the need for open space provision on larger sites. Asking for green infrastructure, without specifying more exact/quantifiable targets risks under provision and proposals not maximising the potential for green infrastructure on a site. In relation to smaller sites and requiring green infrastructure without setting more exact targets, historically, it has been difficult to monitor and therefore assess the performance of similar policies.

	spaces that are costly to manage and maintain and offer little value to residents, as has historically been experienced in the city.	
Option c Set out a specific quantity standard of the number of hectares per 1,000 population for green space provision on all new developments in city	This would provide a simple target to monitor and report on.	Such a target would not necessarily be meaningful as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. It is more meaningful to measure and provide greenspaces on a more localised basis. Work on the Local Plan 2036 identified the challenge that it is increasingly difficult to manage the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites.
Option d Do not include a policy for providing new green infrastructure, defer to national policy/standards.	This would allow for greatest flexibility for applicants to work within the constraints of their site.	This option would be limited in influencing the amounts of greening undertaken on a site and would not set any minimum expectations on proposals. It could result in opportunities to maximise green infrastructure being missed and is likely to have less of a positive influence on the design of natural elements of designs.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options (A, B, A+B, C, D)

High-level screening conclusion? the options are similar to each other from a sustainability perspective.

Screened in for detailed appraisal? No

Rationale:

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, and **7. Green Infrastructure**. There is also some relevance to criterion **10. Biodiversity**.

All options are going to score positives for criteria 2, 7 and 10. because they seek to bring in additional greening as part of new development, apart from option g (no policy – defer to national policy/standards) which would score neutral. The differences between the policies relate to how the additional greening is delivered and how the amount is determined. The extent of the positive impact of these options will be dependent on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Enhancement and provision of new Green Infrastructure Features – Policy G2

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of options **A** and **B**. Policy would set out requirements for green and blue infrastructure features to be associated with new development schemes, and where there are existing GI features for these to be enhanced. The approach will allow for specific requirements for new or enhanced features as applicable to the parameters of the site and its context. Specific amounts of open space provision will only be required for large sites. The combined approach will allow for some degree of flexibility with respect to requirements depending on the parameters of the site, while ensuring that GI forms a fundamental element of development schemes coming forward.

Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor

- At its most basic, the Urban Greening Factor (UGF) is a policy tool that provides a way of simply quantifying green surface cover on a given development site via a metric system. UGF schemes have been applied in several cities through planning policy including the London Plan and the Southampton Local Plan. The methodology is also one of the Headline Standards that form the basis of the Natural England Green Infrastructure Framework.
- The UGF can be used to quantify in simple terms the amount of green infrastructure being proposed as part of a development scheme. Policies that incorporate the UGF can require proposals to secure a certain target, or to simply demonstrate a betterment in score compared with the existing site. The use of the UGF is intended to achieve separate objectives to biodiversity net gain, though it will be mutually supportive. Instead, the key intent of the UGF is to help address a variety of

wider place-making and environmental issues, for example, making spaces that are more pleasant for people, as well as delivering resilience/adaptation to climate change (more green infrastructure can improve flood resilience and reduce urban heat).

- Requiring applicants to use an UGF could be a useful way of improving the way that green infrastructure provision on sites is quantified. The policy options below set out possible approaches for applying the tool in the Oxford context and have been developed with consideration of the strengths and weaknesses of the methodology.

Table 3 - Policy options set 005c: Provision of new GI features – Urban Greening Factor

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development	Would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. UGF tools are quick and simple to use and to be understood by a range of users, they can assist in discussing and visualising levels of greening on a site. Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.	The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures. Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc. as with any other application. They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric. The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, but it would be an additional ask of applicants.

Option b The scale of application of the UGF tool could be across select sites/ areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be: • Major applications • Specific site allocations which are not already sufficiently green. • Retail/district centres • Areas of deficit of green surface cover and/or heightened climate risk.	This avoids unnecessary work by avoiding areas that are already particularly green. It is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.	Could be missing out on opportunities to promote greening elsewhere in the city – encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.
Option c Incorporate the use of an Urban Greening Factor (UGF) into policy with bespoke higher scoring for areas of the city identified as a priority greening area - determined by the level of deficit of green surface cover and/or heightened climate risk.	This can secure targeted betterment in areas where there is a clear deficit of green space and potentially reducing the greening requirement on developers for schemes in areas that are already particular green.	Oxford is highly constrained and has a high level of density in some areas. Desktop assessment already indicates what is likely to be an achievable threshold of UGF score, which is lower than the NE baseline. Development sites tend to be fairly small and compact particularly in dense areas where there is deficiency in green space. Achieving higher bespoke scores in areas where there is already deficiency will be difficult and potentially unviable – testing

Option d The scale of application of the UGF tool could be mandatory across all developments in the city.	The ease of use of the tool and the non-prescriptive requirement of simply achieving betterment (leaving a site greener than it started) could be quite easily applied to many areas.	Some sites in the city are already quite green and achieving betterment could be difficult to achieve/of little value. The tool is better suited to harder, grey areas with little greening at present. The tool does not distinguish between quality/condition in detail, therefore, there is a risk that on particular green sites, the policy requirement could promote replacement of existing established/quality features for other poorer quality features.
Option e Do not incorporate an UGF into policy	The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, however, it is an additional ask of applicants.	The tool is a simple and practical way of quantifying and better negotiating net gains in greening on sites which has a range of benefits including climate adaptation, mental and physical health and wellbeing and biodiversity.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? various options (A, A+B, A+C, A+D, E)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The options relate to whether or not to include policy requirement for undertaking an urban greening factor assessment (option a) or not (option e), as well as various options for the scale of application to which such a requirement would be applied (options b, c and d).

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **7. Green Infrastructure**, and to **criteria 5. Inequalities** (some of the options address greening in areas that are below average for green infrastructure currently). All options are going to score a minor positive for criteria 7. because they seek to bring in additional greening as part of new development, apart from option e (no policy) which would score neutral. Option b and c seek to prioritise greening in areas which are lacking, (the difference is just which areas) so would also score a minor positive for inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Provision of new Green and Blue Infrastructure: Urban Greening Factor –Policy G3

The preferred approach for the Local Plan 2045 draft policy is to take forward **option B**. This option will incorporate the use of UGF into policy and the use of the tool will be encouraged for all developments, however its mandatory use will only be required for a selected category of development. This approach will enable targeting application of the methodology to where the most benefits may be accrued, for example development types that present opportunities to secure significant betterment in green surface cover or areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.

Appendix B List of Core Spaces

Policy G1 Site ID	Policy G1 Site reference	Typology	Contains (partial or whole) Registered Park and Garden? Designated OHAR?	Contains (partial or whole) Designated ecological site?	50% or more of site contains TVERC NRN status - Core	50% or more of site contains Flood zone 3b?	Additional comments relating to rationale for core designation
1	St. Clements Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
4	Memorial Garden	Amenity Green Space	RPG				
5	Oatlands Recreation Ground	Parks and Recreation Grounds				Yes	
6	Oatlands Play Space	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
7	Botley Park	Parks and Recreation Grounds		OCWS		Yes	

8	Botley Road MUGA	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
9	Botley Road Tennis	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
10	Botley Road Bowls	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
11	Botley Road Play Space	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
12	Osney Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
14	Spragglesea Mead and Dean's Ham Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
16	Hinksey Park	Parks and Recreation Grounds - Destination Park				Yes	Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

17	Hinksey Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
18	Hinksey Park Tennis Courts	Outdoor Sport (Fixed)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
19	The Links Barracks Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
20	Bartlemas Close (Links) Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
21	East Ward Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
22	Sorrel Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

23	Mill Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
24	Eden Drive Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
25	Elder Stubbs Gardens	Allotments/other food growing	OHAR				As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
26	Fairview Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
27	Pullens Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
28	Barton Fields Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions

							that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
29	Town Furze Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
30	Court Place Farm Allotments +	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
31	Cripley Meadow Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
32	Upper Wolvercote Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
33	Cutteslowe Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

							to private gardens, which are considered important to protect in situ.
34	John Garne Way Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
35	Ramsay Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
36	Osney St Thomas	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
37	Bullstake Close Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
38	New Hinksey Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

39	Fairacres Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
40	Bartholomew Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
41	Richards Way Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
42	Kestral Crescent Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
44	Van Diemens Lane Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
45	Barns Court Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions

							that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
46	Thomson Terrace Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
47	Minchery Farm Allotments (west)	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
48	Lenthall Road Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
49	Cowmead Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
50	Marston Ferry and Blackhall Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

							to private gardens, which are considered important to protect in situ.
53	Gillians Park	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area of significant deprivation and supports wider wellbeing and access to open space in the local neighbourhood.
54	Gillians Half Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
55	Gillians Play Space 1	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
56	Fry's Hill Park	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area of significant deprivation and supports wider wellbeing and access to open space in the local neighbourhood.
57	Fry's Hill Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
58	Fry's Hill Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
59	Fry's Hill MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

79	St Mary & St John CE Primary School	Outdoor Sport (Restricted Use)	OHAR				
88	Wolfson College	Private Open Space				Yes	
103	Magdalen College	Private Open Space	RPG	LWS, SSSI	Yes	Yes	
104	Worcester College	Outdoor Sport (Private)	RPG				
108	St Hildas College	Private Open Space		LWS			
109	Corpius Christi College	Private Open Space	RPG				
110	West Oxford Community School	Private Open Space				Yes	
123	Littlemore Brook	Accessible Natural Green Space		OCWS (Northwest edges)			
153	Furlong Close	Amenity Green Space				Yes	
154	Blackbird Leys Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

155	Blackbird Leys Bowls	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
156	Blackbird Leys Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
157	Blackbird Leys Play Space 2	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
166	Linkside Lake	Private Open Space		OCWS	Yes		
168	Cutteslowe Park Park Volleyball	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
169	Cutteslowe Park Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
170	Cutteslowe Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
171	Cutteslowe Park Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
172	Cutteslowe Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

174	Wolvercote Green Play Space	Play Space (Child)		SSSI	Yes	Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
175	Wolvercote Common	Accessible Natural Green Space		SSSI	Yes	Yes	
178	Wolvercote Lakes	Accessible Natural Green Space			Yes	Yes	
182	Sunnymead Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
183	Sunnymead Park Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
184	Sunnymead MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
185	Sunnymead Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
187	Alexandra Tennis Courts	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

188	Alexandra Courts	Parks and Recreation Grounds					Whilst not an identified destination park, the park is located in an area with limited provision of similar facilities and provides wellbeing benefits for a larger proportion of the wider area.
189	Alexandra Courts Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
192	Trap Grounds	Accessible Natural Green Space		LWS	Yes		
193	Aristotle Lane MUGA	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
194	Aristotle Lane Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
195	Aristotle Lane Recreation Ground	Parks and Recreation Grounds				Yes	
202	St. Margaret's	Private Open Space	RPG				
203	University Parks	Parks and Recreation Grounds - Destination Park	RPG	OCWS and LWS	Yes		Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.

206	Fish Road Gardens	Amenity Green Space				Yes	
207	Oxpens Recreation Ground	Amenity Green Space				Yes	
209	King George's Field	Amenity Green Space				Yes	
210	Seacourt Nature Park	Accessible Natural Green Space				Yes	
214	Grandpont Nature Park	Accessible Natural Green Space	OHAR (partially located within site)				
215	Brasenose College Recreation Ground 1	Outdoor Sport (Restricted Use)				Yes	
216	Brasenose College Recreation Ground 2	Outdoor Sport (Restricted Use)				Yes	
218	University College and Corpus Christi	Outdoor Sport (Private)				Yes	

	College Sports Ground						
219	South Oxford Bowls Club	Outdoor Sport (Private)				Yes	
223	Cold Harbour Nature Area	Accessible Natural Green Space				Yes	
239	Milham Ford Nature Park Play Area	Play Space (Child)		LWS	Yes		Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
240	Milham Ford Nature Park	Accessible Natural Green Space		LWS	Yes		
241	Headington Hill Park	Accessible Natural Green Space					Whilst not identified as a destination park, this is a park identified as making an important contribution to the character of the area including heritage. It is a remnant of historic parkland and has a wide variety of trees with some important specimen species.
248	Peasmoor Piece	Accessible Natural Green Space		OCWS	Yes		
252	Dunstan Park	Accessible Natural Green Space		OCWS			

255	Bury Knowle Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
256	Bury Knowle Park Tennis Courts	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
257	Bury Knowle Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
264	Fettiplace Recreation Gound	Parks and Recreation Grounds		OCWS (partially)			
265	Fettiplace Recreation Gound MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
266	Fettiplace Recreation Ground Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
279	C S Lewis Nature Reserve	Accessible Natural Green Space			Yes		
284	Magdalen Quarry Local Nature Reserve	Accessible Natural Green Space		SSSI	Yes		

286	Valentia Road Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
287	Valentia Road Park	Amenity Green Space				Yes	
289	Old Road Land	Private Open Space		OCWS	Yes		
297	Magdalen Wood	Accessible Natural Green Space		LWS	Yes		
311	Warneford Meadow and Orchard	Accessible Natural Green Space		OCWS	Yes		
312	Oxford Golf Club	Outdoor Sport (Private)		LWS			
313	Boundary Brook Wildlife Corridor	Accessible Natural Green Space		OCWS	Yes		
314	South Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
315	Angel and Greyhound Meadow Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

316	Angel and Greyhound Meadow	Accessible Natural Green Space				Yes	
317	Bat Willow Meadow	Private Open Space	RPG			Yes	
319	Great Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
323	University of Oxford Botanical Garden	Private Open Space	RPG				
324	Magdalen College	Outdoor Sport (Restricted Use)				Yes	
325	Meadow Lane Stakepark	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
326	Meadow Lane Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
327	Meadow Lane Park	Parks and Recreation Grounds				Yes	
338	Barracks Lane Meadow	Accessible Natural Green Space		OCWS	Yes		

339	Cowley Marsh Recreation Ground Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
340	Cowley Marsh Recreation Ground	Parks and Recreation Grounds		LWS (Partly)			
341	Cowley Recreation Ground MUGA	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
342	Cowley Road Recreation Ground Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
343	Florence Park Tennis Courts	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
344	Florence Park Play Area 1	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
345	Florence Park Bowling Green	Outdoor Sport (Fixed)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
346	Florence Park Play Area 2	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

347	Florence Park	Parks and Recreation Grounds - Destination Park					Identified destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
357	Rivermead Nature Park	Accessible Natural Green Space		OCWS	Yes		
360	Aston's Eyot and The Kidneys	Accessible Natural Green Space	OHAR	OCWS	Yes		
361	Christchurch Meadow	Accessible Natural Green Space	RPG			Yes	Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
362	Long Meadow	Private Open Space	OHAR	OCWS	Yes	Yes	
363	Iffley Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
364	Longbridges Nature Park	Accessible Natural Green Space		LWS (Partly), OCWS (Partly), SSSI (Partly)	Yes	Yes	
365	Pembroke College Sports Ground	Outdoor Sport (Private)				Yes	

366	Willow Walk Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
367	Osney Mead	Accessible Natural Green Space		LWS	Yes	Yes	
368	Almonds Farm and Burnt Mill Fields	Accessible Natural Green Space		LWS	Yes	Yes	
369	Victoria Arms Spinney	Accessible Natural Green Space		OCWS	Yes		
373	Wolvercote community orchard	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
374	Pasture by A34 Thames Bridge/Godstow Bridge Meadow	Accessible Natural Green Space		LWS	Yes	Yes	
375	Godstow Bridge Meadow	Accessible Natural Green Space		OCWS	Yes		

376	Godstow Abbey Meadow	Accessible Natural Green Space		OCWS	Yes		
377	Port Meadow with Wolvercote Common & Green	Accessible Natural Green Space		SSSI, SAC	Yes	Yes	Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
378	Cripley Island & Fiddler's Island	Accessible Natural Green Space		OCWS	Yes	Yes	
381	Lye Valley	Accessible Natural Green Space		SSSI, LWS, OCWS, LNR	Yes		
382	Spindlebury Nature Park	Accessible Natural Green Space		OCWS	Yes		
385	Dale Close Open Space (HELAA calls it Friars Wharf Open Space)	Amenity Green Space	OHAR				
387	OxGrow Community Garden	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access

							to private gardens, which are considered important to protect in situ.
388	Hogacre Common Eco Park	Accessible Natural Green Space		OCWS (Partly)		Yes	
412	St Bartholomew's Chapel	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
413	St Mary & St John Church	Churchyards and Cemeteries	OHAR				As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
414	St Michael & All Angels Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
415	Summertown United Reformed Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
416	St Nicholas Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

417	Northway Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
418	St Andrews Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
419	Woodstock Road Baptist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
420	St Mary's Indian Orthodox Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
421	Marston URC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
422	St Andrew's C of E Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

423	St Margarets Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
424	St Luke's Chapel	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
425	St Philip and St James Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
426	St Michael and All Angels New Marston	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
427	Corpus Christi RC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
428	St Giles Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

429	All Saints Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
430	St Barnabas Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
431	Holywell Cemetery	Churchyards and Cemeteries		OCWS (Partly)	Yes		As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
432	St Mary Magdalen	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
433	St Michael at the North Gate	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
434	University Church of St Mary the Virgin	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

435	St Aldats's Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
436	St Ebbe's Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
437	Wesley Memorial Methodist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
438	St Thomas the Martyr Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
439	St Frideswide's Church	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
440	Greyfriars - St Edmund & St Frideswide RC	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

441	St Matthews Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
442	Catholic Church of Saints Gregory and Augustine	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
443	Church of the Holy Family	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
444	St Peter's Wolvercote	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
445	Our Lady Help of Christians Parish	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
446	St James Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

447	Rose Hill Methodist Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
448	Blessed Dominic Barberi	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
449	St Mary & Saint Nicholas Littlemore	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
450	St Albans Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
451	St Lukes Church	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
452	St Mary the Virgin Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

453	The Church of Jesus Christ of Latter	Churchyards and Cemeteries				Yes	As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
454	Oxford Salvation Army	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
455	St Mary C of E Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
456	Collingwood Road URC Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
457	Cornerstone Church	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
458	Holy Trinity Headington Quarry	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.

459	Elsfield Road Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
460	Headington Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
461	St Sepulchre's Cemetery	Churchyards and Cemeteries	RPG				As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
462	Rose Hill Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
463	Wolvercote Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
487	Brasenose Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

492	Sandford Brake	Accessible Natural Green Space		LWS	Yes		
493	Bagley Wood	Accessible Natural Green Space		LWS	Yes		
494	South Ward Red Bridge Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
496	Showmans Field	Amenity Green Space		LWS			
501	Burgess Field Nature Reserve	Accessible Natural Green Space		OCWS			
502	Trap Ground Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
503	Lower Wolvercote Allotments	Allotments/other food growing				Yes	As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.

505	Botley Cemetery	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
506	South Park Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
510	Barton Park Play Area	Play Space (Child)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
511	Barton Park	Amenity Green Space		OCWS (partial)		Yes	
513	Wolvercote Picnic Area	Amenity Green Space			Yes	Yes	
515	Longbridges Nature Park	Accessible Natural Green Space				Yes	
518	Barracks Lane Community Garden	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
520	Magdalen College Fellows' Garden	Private Open Space	RPG		Yes		

523	Abingdon Road Disused Allotments	Private Open Space				Yes	
524	Voco Oxford Spires	Private Open Space				Yes	
525	Arlington Drive	Accessible Natural Green Space		LWS	Yes	Yes	
526	Green Belt land to rear of Dragon School	Private Open Space				Yes	
527	Oxford Golf Centre	Outdoor Sport (Private)				Yes	
528	Parson's Pleasure	Amenity Green Space	RPG		Yes	Yes	
529	Elmthorpe Convent	Churchyards and Cemeteries					As a churchyard/cemetery this space provides a specific combination of functions, particularly supporting the city's wider heritage, which are considered important to protect in situ.
530	Wytham Woods	Accessible Natural Green Space		SSSI	Yes		
539	Alexandra Courts Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

540	Aristotle Lane Basketball	Play Space (Youth)				Yes	Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
543	Thames Walk	Accessible Natural Green Space				Yes	
545	Cutteslowe Park Minigolf	Outdoor Sport (Private)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
546	Cutteslowe Park Splash Park	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
547	Cutteslowe Park Play Space	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
549	Music Meadow	Accessible Natural Green Space				Yes	
553	Fettiplace Skatepark	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
554	Fettiplace Recreation Gound Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
556	Hinksey Splash Play Area	Play Space (Child)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.

560	Florence Park Basketball	Play Space (Youth)					Supporting features accommodated within boundary of park and contributing to its wider wellbeing function.
561	Florence Park Play Space	Play Space (Child)					Supporting features accommodated within boundary of Florence park and contributing to its wider wellbeing function.
567	Binsey Green	Accessible Natural Green Space		LWS	Yes	Yes	
568	Poplar Walk	Amenity Green Space	RPG			Yes	
573	New Marston Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
574	New Marston Meadows	Accessible Natural Green Space		SSSI	Yes	Yes	
575	Wolfson College Nature Reserve	Accessible Natural Green Space		SSSI	Yes	Yes	
577	Rock Edge Nature Reserve	Accessible Natural Green Space		SSSI, LNR	Yes		
578	Stansfeld Park	Private Open Space		OCWS	Yes		

579	Shotover Country Park	Accessible Natural Green Space	RPG	SSSI	Yes		Also, identified as a destination park playing a particularly important role as a major park providing wellbeing benefits to a large proportion of the wider area.
580	Oriel Meadow	Private Open Space				Yes	
581	Denny Garden Allotments	Allotments/other food growing					As a communal space for food growing, site provides a specific combination of functions that support wellbeing of the local community, particularly those without access to private gardens, which are considered important to protect in situ.
583	St Johns College	Private Open Space	RPG				
584	St Johns College	Private Open Space	RPG				
585	Trinity College	Private Open Space	RPG				
586	Trinity College	Private Open Space	RPG				
587	Wadham College	Private Open Space	RPG				
595	All Souls College	Private Open Space	RPG				
597	New College	Private Open Space	RPG				

599	Merton Field	Private Open Space	RPG				
600	Merton College	Private Open Space	RPG				
601	Christchurch College	Private Open Space	RPG				
602	Christchurch College	Private Open Space	RPG				
603	Christchurch College	Private Open Space	RPG				
604	Christchurch College	Private Open Space	RPG				
612	Wildlife Corridor at River Cherwell 11	Accessible Natural Green Space				Yes	
613	North of Marston Ferry	Accessible Natural Green Space			Yes	Yes	
614	Sunnymead	Accessible Natural Green Space			Yes	Yes	
616	Hook Meadow and Trap Grounds	Private Open Space		SSSI	Yes	Yes	

617	Headington Hill Viewpoint OCWS	Accessible Natural Green Space		OCWS	Yes		
618	Scrub by Heyford Hill Roundabout (inc Littlemore Railway Cutting SSSI)	Private open space		SSSI (Western half of site)	Yes		
619	Land adj Seacourt P & R			OCWS (Partly)	Yes	Yes	
620	North of Botley Road/ around Binsey/ Cripsey Meadow	Accessible Natural Green Space		OCWS,	Yes	Yes	
621	Pixey Mead SSSI			SSSI, SAC	Yes	Yes	
622	Wildlife Corridor South of Pixey Mead	Accessible Natural Green Space				Yes	
623	Wildlife Corridor Lower Wolvercote N Godstow Road	Accessible Natural Green Space				Yes	

625	Wildlife Corridor Lower Wolvercote S Godstow Road	Accessible Natural Green Space				Yes	
626	Land North of Godstow Bridge			LWS	Yes		
627	Land at Wolvercote Viaduct (West of Canal)	Accessible Natural Green Space				Yes	
628	Land at Wolvercote Viaduct (East of Canal)	Accessible Natural Green Space		LWS	Yes	Yes	
629	Nixey's Field	Private Open Space			Yes		
631	Wildlife Corridor at River Cherwell 7	Accessible Natural Green Space				Yes	
632	Wildlife Corridor at River Cherwell 8	Accessible Natural Green Space				Yes	
633	Wildlife Corridor at River Cherwell 9	Accessible Natural Green Space				Yes	

636	Wildlife Corridor at Marston Brook			SSSI	Yes	Yes	
637	Park Farm with adjoining OCWS			OCWS	Yes	Yes	
638	Isis Farmhouse Pub w/surrounding OCWS			LWS	Yes	Yes	
641	Wildlife Corridor North of South Hinksey					Yes	
643	Land South of Ulfgar Road	Private Open Space				Yes	
647	Land behind Oxford Spires Hotel	Private Open Space				Yes	
648	Extension to HELAA site 127	Private Open Space				Yes	
650	Wildlife Corridor at West Godstow Road	Accessible Natural Green Space				Yes	

653	Boundary Brook Nature Reserve	Accessible Natural Green Space		OCWS	Yes		
660	Land south of A40, Old Marston	Private Open Space			Yes	Yes	
662	Former Binsey Lane Allotments	Private Open Space				Yes	
663	Meadow North of Goose Green	Accessible Natural Green Space		LWS	Yes	Yes	
664	Minchery Farm OCWS	Accessible Natural Green Space		OCWS	Yes	Yes	
665	Field North of Osney Mead OCWS	Accessible Natural Green Space		OCWS	Yes	Yes	

Background paper 005b

Title: Biodiversity

This paper addresses the protection of biodiversity, including designated sites, as well as enhancing biodiversity.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network.
SA Objective(s): 10. To conserve and enhance Oxford's biodiversity.
SEA theme(s): Landscape, biodiversity, flora, fauna.

1. Introduction	1
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	1
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	3
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	12
5. Key issues addressed through the Local Plan	13
Implementing Biodiversity Net Gain in Oxford.....	13
Further supporting onsite biodiversity including priority species	14
Oxfordshire's Local Nature Recovery Strategy	15
Protecting designated sites and other areas of habitat.....	17
Appendix A – Regulation 18 Policy options sets	18
Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity	19
Delivering mandatory net gains in biodiversity – draft Policy G4	22
Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity	23
Protecting and enhancing onsite biodiversity – draft Policy G5	26
Policy options set 005f (draft policy G6): Protecting Oxford's ecological network	26
Protecting Oxford's ecological network – draft Policy G6	31

1. Introduction

- 1.1 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

- 2.1 In relation to Biodiversity, the NPPF sets out:
- **Para 187:** that plans should: recognise the wider benefits from natural capital and ecosystem services such as trees and woodland, and minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
 - **Para 188:** that Local Plans should distinguish a hierarchy of designated sites and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
 - **Para 192:** that local plans should identify, safeguard components of wildlife-rich habitats and wider ecological networks; promote the conservation/restoration/enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify/pursue opportunities for securing measurable net gains for biodiversity.

Planning Practice Guidance and National Design Guide/Model Design Code

- 2.2 The online Planning Practice Guidance has a dedicated page for the [natural environment](#) including green infrastructure and biodiversity considerations. In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and habitats; 'proportionate' information and assessment required on biodiversity impacts at all stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

- 2.3 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

The Environment Act

- 2.4 This legislation received Royal Assent on 9th November 2021 and includes provisions to strengthen and improve the duty on public bodies to conserve and enhance biodiversity. In particular, it introduces a mandatory requirement for net gains in biodiversity of 10% from most forms of new development approved through the planning system, this must be calculated using the DEFRA Biodiversity Metric and informed by a biodiversity gain plan which details the strategy for how biodiversity net gain will be delivered. The Act also requires the preparation and publication of Local Nature Recovery Strategies to support Nature Recovery Networks by setting out priorities for nature recovery and proposing actions in the locations where it would make a particular contribution to achieving those priorities. These Recovery Strategies are to be prepared by 'Responsible Authorities' as appointed by the Secretary of State, Oxford falls into the strategy that will cover the Oxfordshire County area.

Natural Environment and Rural Communities Act 2006

- 2.5 Section 40 of this Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.6 Legislation that previously transposed the European Habitats Directive (European Commission 92/43/EEC) into English law was amended upon exit from the EU in order to transfer functions from the European Commission to the appropriate authorities in England and Wales but otherwise functions broadly the same. The Regulations designate Special Areas of Conservation (SAC) and Special Protection Areas as priority locations for biodiversity conservation. In Oxford, this is the Oxford Meadows SAC, and near Oxford are the Cothill Fen SAC and Little Wittenham SAC. The effects of any plan or programme on these designated areas must be assessed via a Habitats Regulations Assessment (HRA).

National Parks and Access to the Countryside Act 1949

- 2.7 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Oxford Local Plan 2036

- 2.8 As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network including policy G2 which addresses biodiversity and the

ecological network specifically, including protections for national and locally designated sites.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

- 3.1 It has long been noted that the biodiversity around the country is under intense pressure and has been in prolonged decline. This biodiversity loss is particularly pronounced in cities and urban areas such as Oxford as wildlife is forced out of natural habitats due to development pressure, recreational disturbance, pollution from various sources, as well as climate change. A particular issue in the city relates to the ecological conditions in Oxford's rivers and streams as water quality is being put under pressure from various sources including sewage discharges, invasive species and pollutants arising from agricultural practices upstream. This issue is explored in greater detail in the separate Natural Resources Background paper and more fully in the Water Cycle Scoping Study.
- 3.2 Nevertheless, Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, including lowland hay meadows, calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. A number of sites have been designated as being of particular importance to ecology including:

The Oxford Meadows Special Area of Conservation (SAC)

- 3.3 An internationally important site of nature conservation importance. The SAC is situated on the broad floodplain of the River Thames to the west and north-west of Oxford. The site is made up of an extensive complex of meadows and pastures which support species-rich grassland vegetation which would once have been widespread on floodplains in lowland England, but which is now very rare. The qualifying features for which the area was designated as a SAC are the presence of Lowland Hay Meadows habitat and the species *Apium repens* (creeping marshwort), which is a very rare plant of seasonally-flooded habitats. The Port Meadow population of this plant remains the largest and most consistently recorded in the UK.
- 3.4 Natural England's assessments indicate that the colony of *Apium repens* is under pressure from hydrological changes in the areas, possibly due to deeper, more prolonged and frequent flood episodes. There is also concern about invasive species moving into the habitat from other parts of the meadow and outcompeting the plant. Additionally, previous liaison with Natural England relating to Habitat Regulations Assessments work undertaken by the Council for the SAC have identified potential vulnerabilities arising from the impacts of air pollution (from traffic on the nearby roads), recreational disturbance due to increased visitors to the area (particularly those with dogs), as well as impacts from changes to hydrology and water quality as noted above.

3.5 There are also two other SACs within 10km of Oxford, these are:

- **Cothill Fen SAC** is a 43ha site located just over 5km from the city boundary. It is designated for its lowland valley mire, which contains one of the largest surviving examples of alkaline fen vegetation in central England. In 2015, the last year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('global') value. It is highly threatened by pollution to groundwater and human-induced change in hydraulic conditions.
- **Little Wittenham SAC** is a 69ha site located around 8.5km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In 2015, the last year of analysis of Little Wittenham, it was of good overall ('global') value, but it is highly threatened by non-native invasive species.

Sites of Special Scientific Interest (SSSIs)

3.6 These nationally important designated sites include four geological SSSIs and eight ecological SSSIs that are wholly or partly within the city, as well as others nearby. Four of these SSSIs comprise the Oxford Meadows SAC: Cassington Meadows SSSI; Pixey and Yarnton Meads SSSI; Port Meadow with Wolvercote Common and Green SSSI; and Wolvercote Meadows SSSI.

3.7 Natural England intermittently publishes condition assessments for the units comprising the SSSIs, which is available on the [Designated Sites View website](#). These assessments are usually 5-10 years old, as such the condition may have changed in the intervening years since the last assessment was completed. As can be seen in Figure 3.2 and Table 3.2, the SSSIs are in varying condition, and of the twelve within or partially within the city, two SSSIs are in unfavourable condition and three are partly in unfavourable condition, whilst the others are in a favourable condition.

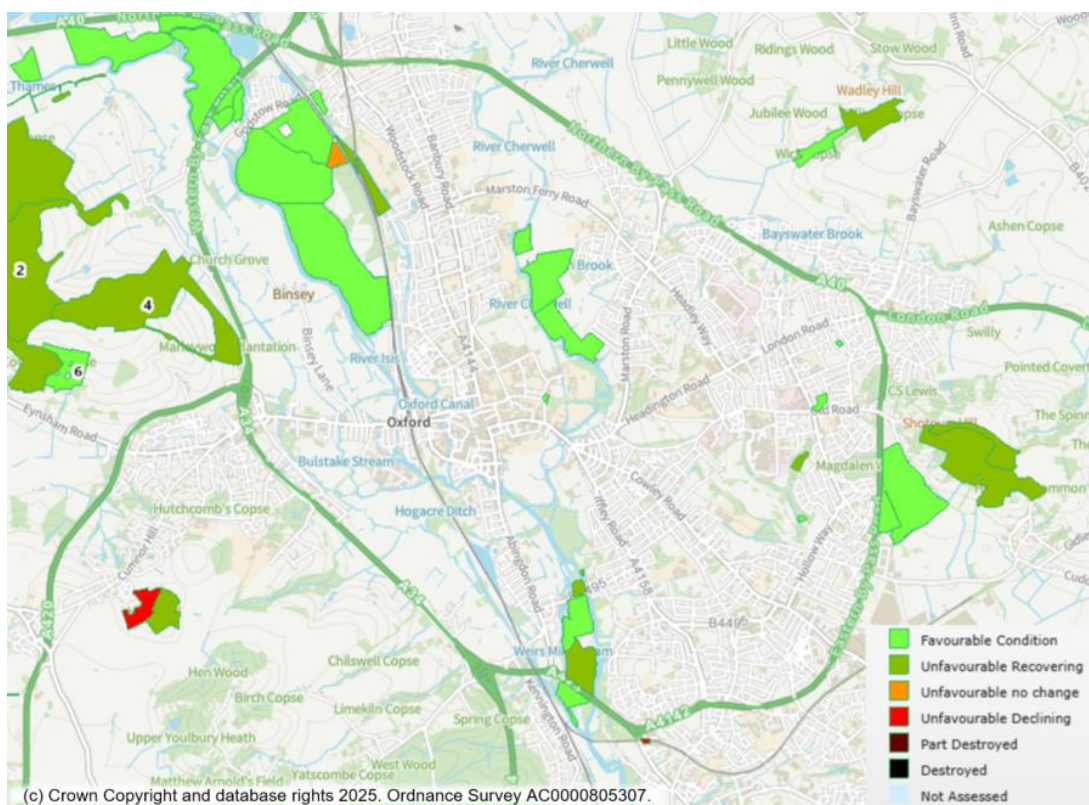


Figure 3.2 - Locations of Special Scientific Interest (SSSIs) within and around Oxford and their condition, source: [DEFRA MAGIC website](#) accessed 13.01.25)

Table 3.2 - Condition assessment for the Sites of Special Scientific Interest (SSSIs) within Oxford or nearby (Natural England)

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city (<i>also comprises part of Oxford Meadows SAC</i>)	100.00% Favourable
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting	0.50ha	Yes	100.00% Unfavourable declining
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove	0.43ha	Yes	100.00% Favourable
Magdalen Quarry	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable

Pixey and Yarnton Meads	86.38ha	Partially (<i>also comprises part of Oxford Meadows SAC</i>)	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes (<i>also comprises part of Oxford Meadows SAC</i>)	100.00% Favourable
Rock Edge	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes (<i>also comprises part of Oxford Meadows SAC</i>)	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

Local ecological designated sites

- 3.8 The city includes a number of locally important sites made up of Local Wildlife Sites, Oxford City Wildlife Sites and Local Nature Reserves. These are non-statutory sites of local importance for nature conservation, recognised for having high conservation value, containing rare species or habitats whose protection is bestowed upon them via the policies of the Local Plan rather than national legislation. This means that our policies will be particularly important for these local features which do not reach of the benchmark of higher protections and yet can still be valuable refuges of priority habitats and for local species.
- 3.9 Local Wildlife Sites are designated through criteria that is shared across the county, meanwhile Oxford City Wildlife Sites are sites of importance to the city which were established as part of work on the Local Plan 2036 (replacing what were previously known as Sites of Local Importance to Nature Conservation or 'SLINCS'). Whilst the overall interest of OCWSs has not been considered sufficient to be of county level importance in the same way LWSs are, with appropriate management, many do however have the potential to become LWSs in the future. The Thames Valley Environmental Records Centre (TVERC), undertake yearly reviews of sites across the county and assign LWS status on new sites where these are deemed to meet specific criteria.
- 3.10 As part of its work on the Local Plan 2040, the Council undertook a high-level review of its existing OCWSs to consider whether it was still appropriate to protect them and whether there were additional sites that might meet the criteria of local designation as either an OCWS (or LWS). This review was supported by a limited number of new surveys undertaken throughout 2023. As set out in Table 3.3, the work resulted in four previously proposed OCWSs being formalised (although in practice, these were already treated as full OCWS sites because of their proposed status at the time), as well as the addition of three new OCWSs. In addition, two sites were taken forward as LWSs via the county-wide selection process.

Table 3.3 - Recent updates to ecological network of local sites in city

Site name	Result of review process
Mileway Gardens	Previously proposed OCWS – Designation confirmed
Churchill Hospital Field	Previously proposed OCWS – Designation confirmed
University Parks	Previously proposed OCWS – Designation confirmed
Stansfeld Study Centre	Previously proposed OCWS – Designation confirmed
Burgess Field	New OCWS designation confirmed
Dunstan Park	New OCWS designation confirmed
CS Lewis Reserve	New OCWS designation confirmed
Showman's Field	New LWS designation confirmed
Marston Brook Meadow	New LWS designation confirmed

Other important areas of habitat

- 3.11 Beyond these formally designated sites within the city, there are also many of types of habitats which have been formally identified as being of importance in other ways. This includes Priority Habitats under Section 41 of the Natural Environment and Rural Communities Act 2006, many of which are included within Conservation Target Areas that were identified as part of work on Oxfordshire's Biodiversity Action Plan (BAP) for being the most important areas for wildlife conservation in Oxfordshire and where targeted conservation action will have the greatest benefit. It should be noted that the expectation is that the mapping of the Local Nature Recovery Strategy will subsume and replace the previous Conservation Target Areas.
- 3.12 There are also areas of irreplaceable habitat in the city, which are afforded significant protection through national planning policy. These types of habitat include several areas of ancient woodland, including at Brasenose Wood and at Shotover Country Park which straddles the boundary of the city to the east, as well as areas of lowland fen habitat such as can be found in the Lye Valley SSSI.

Protected species

- 3.13 The various types of habitat discussed above are important for supporting a range of wildlife species, many of which are under direct threat from pressures like habitat loss, climate change and pollution. The city has records of a variety of notable species, again as identified under Section 41 of the Natural Environment and Rural Communities Act 2006 referenced above. Species that are present in Oxford and that are protected under the Act include, but are not limited to: Hedgehogs, Water voles, Dormice, Swifts and Slow worms.
- 3.14 It is not only the natural environment which supports some of these different types of wildlife either. There are certain species present in the city which have come to rely upon elements of the built environment to support their life cycle. For example, urban birds like

swifts which return to the UK every spring to breed and raise young and that have experienced significant declines. Swifts have come to rely on buildings for nesting and will often return to the same nest site each year so the re-development and demolition of buildings, and loss of old nest sites can have further negative impacts. The development process can support the species through careful design and inclusion of artificial roosting features.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 The currently adopted Local Plan 2036 will maintain protection of ecological sites within the city (via LP2036 policy G2) alongside protection of the network of green infrastructure across the city. The Local Plan 2036 sets out that development that results in a net loss of sites and species of ecological value will not be permitted and includes specific details of protection/mitigation required for the SAC, SSSIs and Local sites. Alongside this, protection exists within national policy, such as affording protection to nationally designated sites as well as protections more generally to open space.
- 4.2 The requirement of 5% net gain in biodiversity in Local Plan 2036 policy G2 for all major developments proposed on greenfield sites or brownfield sites that have become vegetated has already been superseded by the 10% requirement of the Environment Act. With the mandatory 10% biodiversity net gain being set as a condition unrelated to the Local Plan and with the expectation being that the associated habitat is secured for at least 30 years, there is potential that biodiversity could receive increasing support going forwards without a new Local Plan, however, opportunities for this net gain to be delivered within the city are likely to be limited. The county's Local Nature Recovery Strategy (LNRS) will identify opportunity areas for enhancement actions to improve biodiversity in due course, however, the LNRS cannot force enhancements nor assign additional protection, thus these opportunities will rely on willing landowners and sufficient sources of funding, thus their benefit for biodiversity is not certain.
- 4.3 The GI study 2022 noted the unequal distribution of certain types of green space and this is likely to remain the case in the absence of the new Local Plan – and this would include more nature rich spaces. The constrained nature of the city means that opportunities for creation of significant new green spaces within the denser urban areas will remain limited and smaller-scale enhancement are likely to be more forthcoming where resource and changes to management practices are forthcoming. A growing population as the city grows means that green spaces including those for nature will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this could lead to a deterioration of these spaces.

- 4.4 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).
- 4.5 Climate change could influence biodiversity in various ways such as by making ecological sites less suitable for the species that rely on them or driving changes in species distribution as they move to better suited climates. It could also lead to influxes of invasive species that are better suited to the new climate. Generally, it has been suggested that in the longer term, there is a significant risk of direct impacts on priority habitats. Equally, pressures on watercourses impacting ecological conditions will likely continue without various interventions such as upgrades to key wastewater infrastructure as are noted in the green infrastructure section.

5. Key issues addressed through the Local Plan

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to biodiversity and nature conservation. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Implementing Biodiversity Net Gain in Oxford

5.3 Policy G4 sets a requirement of 10% net gain consistent with the target required through the Environment Act. This target should be considered as a minimum, however, and the policy encourages delivery which exceeds this wherever possible. There were responses to the Regulation 18 consultation that expressed a desire for the Council to go with a higher target, and officers are aware of other authorities pushing for higher levels.

5.4 It is important to recognise that the 10% net gain requirements of the Environment Act are very specific in how they can be delivered. The requirement is essentially focused on habitat creation (as a proxy for biodiversity) which must be to a certain quantity and quality that conforms with the Statutory Biodiversity Net Gain metric, which is the calculation tool applicants are expected to use to assess and demonstrate how they have met the target. A higher requirement would mean higher amounts of habitat creation but potentially still missing out on delivering enhancement for the full range of species that need to be supported in the city. It could also limit delivery of other important types of green features that have other benefits, such as for people (recreation, food growing). Additionally, for many sites in the city, a higher than 10% target is also likely to result in additional proportions of offsetting payments being secured for delivery in other locations, rather than extra habitat creation on sites themselves.

5.5 For the above reasons, the Local Plan seeks to maintain the requirement at 10% but to reinforce this requirement through other policy requirements that seek to support biodiversity in other ways (as discussed further below), as well as deliver broader greening on development sites (e.g. policy G3).

Further supporting onsite biodiversity including priority species

5.6 Whilst biodiversity net gain is one mechanism for delivering new habitat for biodiversity, it is important that the Local Plan utilises other mechanisms to deliver for nature. This is also important because, as discussed earlier, the DEFRA metric primarily focuses on habitat as a way to support species, whereas there are other important features that support wildlife which are not recognised/incentivised by it. For example, species-based features like bird and bat boxes are not included within the metric but can be just as valuable to more urban wildlife.

5.7 Oxford hosts a range of important species and these have varying environmental needs in terms of space, shelter, and feeding. Our urban context and the development processes that happen throughout the city can negatively impact these species in different ways, like fragmenting landscapes, introducing pollution, removing food sources and spaces to rest. In some cases though, development can positively support these species too, particularly for the wildlife that have come to rely on areas of the urban environment to flourish, e.g. buildings for roosting.

5.8 The planning process is an important mechanism for mitigating negative impacts on existing species where they could arise but also for supporting developers to maximise on opportunities to positively support species in other ways. Whilst policy G6 includes requirements for ensuring that important species on a site are properly identified and

impacts on them mitigated in accordance with the mitigation hierarchy, policy G5 sets out the additional enhancement actions the Council expects to see to support onsite biodiversity regardless of whether 10% habitat net gain has been provided onsite or not.

5.9 The onsite ecological enhancements list has been devised to offer applicants as much flexibility as possible to respond to the specifics of their site. The list includes a number of potential enhancement features which have been chosen for their suitability in supporting known species in Oxford and that are generally not covered by the considerations of the Statutory BNGy metric. Applicants are required to select from a certain number of features depending on the scale of the development from three different ‘pots’. Some features (those in first pot) are mandatory and form a minimum provision, whilst the other two pots address needs for shelter/movement and for other supporting landscape features. The intention is for this list to be kept live and added to in the future, so whilst the initial list is included in the appendix to the Local Plan, future versions will be published via the Technical Advice Note along with additional guidance on how they should be implemented in a scheme.

5.10 Alongside the minimum standards for green surface cover on a site as set out in policy G3 (and discussed in the green infrastructure background paper), policy G5 is intended to ensure that overall new development will bring forward a variety of additional spaces for nature. The combination of these policies is considered to be a more bespoke but pragmatic approach response to the constraints of many sites in Oxford that is in keeping with the spirit of going beyond the minimum 10% biodiversity net gain. It also means that, even if the Environment Act’s 10% net gain cannot be delivered onsite, the Local Plan can help ensure direct onsite delivery of features to support nature throughout the city.

Oxfordshire’s Local Nature Recovery Strategy

5.11 Oxfordshire County Council published the [Oxfordshire Local Nature Recovery Strategy](#) (LNRS), which includes the Oxford area, in November 2025. The LNRS is made up of a number of documents, including a Local Habitat Map, Statement of Biodiversity Priorities, Species Priorities List, and a Description of the Strategy Area.

5.12 Of particular spatial relevance to the city as covered by the Local Plan is the Local Habitat Map, which is intended to help a range of stakeholders, including landowners, conservation groups, and local communities to target their efforts where they’ll have the most impact, creating a stronger, more connected natural landscape across Oxfordshire. The Habitat Map identifies both:

- existing areas of particular importance to biodiversity – which, in the city, are primarily limited to national and locally designated ecological sites; and
- areas that could become particularly important to biodiversity – which can also be known as ‘recovery’ areas,

5.13 In complying with their duties under Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021), local authorities need to “have regard” to the relevant Local Nature Recovery Strategy. The Council has engaged in the development of the LNRS and sought to ensure that the various priorities and opportunities identified in it are reflected where possible in the Local Plan, whilst balancing the range of broader sustainability objectives need to be planned for within a highly constrained city.

5.14 In particular:

- any site allocation in Chapter 8 of the plan which includes opportunity areas identified in the LNRS, flags this as part of the policy. The policy identifies that the site includes areas identified in the LNRS and that the LNRS sets out particular measures which would be particularly beneficial for biodiversity. In this way, applicants are encouraged to refer to the LNRS and incorporate BNG which aligns with the strategy.
- for applications coming forward elsewhere in the city, the overarching policy G4 applies and specifically sets out that *opportunities to deliver measures which align with those identified in the LNRS as part of any net gain provision should be prioritised, particularly where a proposal is located in an area identified in the LNRS, unless site constraints would make this unfeasible.*

5.15 It should also be noted that many areas of the LNRS are protected from development through the Local Plan’s protection for the green infrastructure network, as set out in Policy G1.

5.16 As the county’s website notes, *the main purpose of the LNRS map is to show which locations hold the greatest potential to benefit nature and the wider environment if habitats were created or enhanced in those places. However, this does not mean that landowners and managers would be required to implement any of these measures.* The mapping identifies a range of potential measures that could be targeted to different locations based on a range of the best and latest data available including soil data, but these locations and identified measures would need to be sense-checked in-person, to ensure the right habitat is created in the right place. As such, the Local Plan seeks to ensure applicants and decision makers take account of the LNRS whilst also acknowledging that particular site

context may or may not allow the specific actions within the LNRS to be implemented in practice.

Protecting designated sites and other areas of habitat

5.17 The earlier section 3 detailed the extensive network of designated ecological sites in the city which have either international, national or local importance for biodiversity. Policy G6 sets out how the Local Plan will protect the hierarchy of ecological sites for the future of the city. Because the various sites have been designated for a range of qualities, they are susceptible to different sorts of impacts from new development and so the policy acts as an overarching protection from adverse impacts and requires appropriate mitigation which will need to be informed by relevant data sources such as Natural England's SSSI Impact Risk Zones mapping.

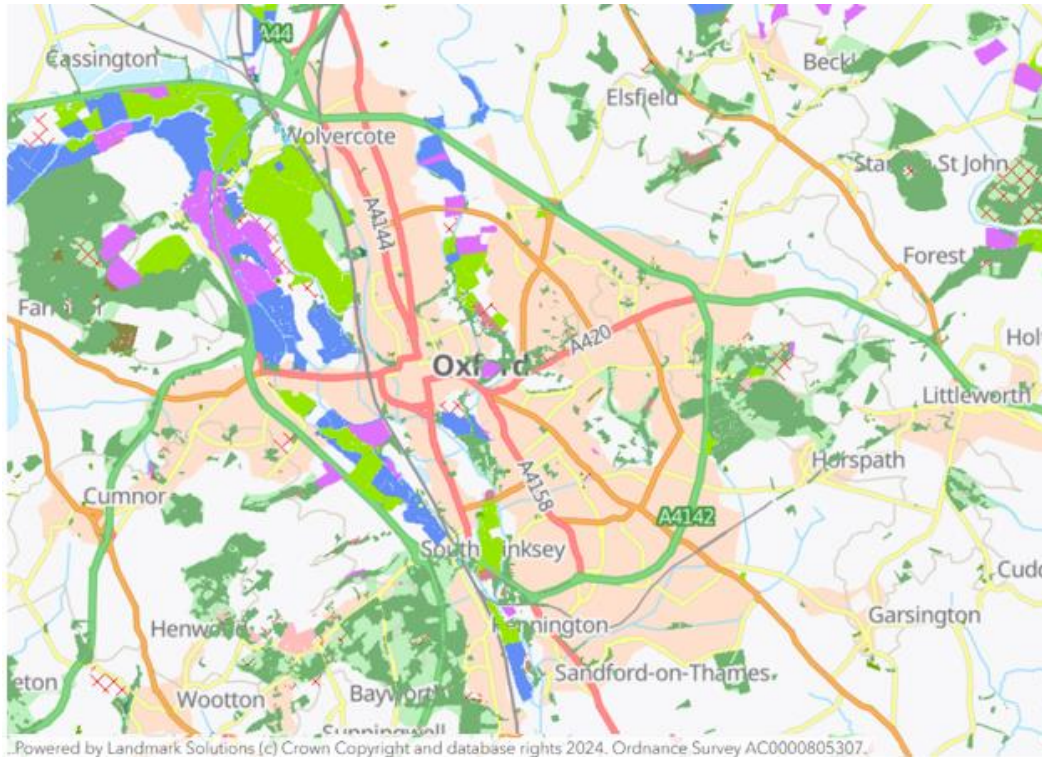
5.18 The considerations for potential adverse effects will differ depending on the site and its particular sensitivities. A number of the sites in the city are particularly susceptible to impacts on hydrological processes including those associated with surface water and groundwater, this includes the Oxford Meadows SAC, as well as some SSSIs including Lye Valley, New Marston Meadows and Iffley Meadows. Policy G6's supporting text therefore explicitly highlights these risks in its supporting text, and the policy itself lists a wider range of potential impacts that could have adverse effects.

5.19 Informed by separate workstreams such as the Habitats Regulations Assessment (HRA), for the Oxford Meadows SAC, and the Source Pathway Receptor Analysis (SPRA), for the SSSIs, relevant allocated sites that have been identified as having the potential to impact upon protected sites also include explicit requirements for mitigation of impacts to ensure these risks are addressed by applicants (with cross reference to policy G6).

5.20 Of course, there is also valuable habitat that exists beyond the boundaries of designated sites. Irreplaceable habitat, is highly protected through national policy, and whilst this does not need to be repeated in the Local Plan, Policy G6 also makes clear that the Council will apply the strict tests in the NPPF to applications that could impact this habitat.

5.21 Additionally, there is a significant amount of priority habitat in the city as is highlighted in Figure 5.1. The most significant locations of this habitat are protected through the GI network's policy G1.

Figure 5.1 Mapping of various priority habitats in the city according to DEFRA Magic mapping (accessed January 2026).



5.22 More generally, Policy G6 sets out that proposals with a reasonable likelihood of adversely impacting natural and/or semi-natural habitats, or protected species, on or immediately adjacent to the site, will only be permitted where they have been informed by targeted ecological surveys and impacts addressed in line with the mitigation hierarchy. This would apply wherever a development is located.

Appendix A – Regulation 18 Policy options sets

Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity

There is a national mandatory requirement for providing 10% Biodiversity Net Gain (BNG) as part of planning applications (subject to some exceptions in the legislation). Applicants are incentivised through the DEFRA biodiversity metric (used to calculate net gain) to provide this onsite or in areas identified within an appropriate strategy, but are able to find other offsite options where necessary.

The constrained nature of many sites in the city means that BNG may need to be provided offsite in many instances even if kept to the national minimum target, going higher than this may have impacts in terms of what other features can be provided onsite, or result in more BNG having to go offsite. Where offsite delivery is necessary, the Local Plan can play an important role in steering where this should go. The Local Nature Recovery Strategy identifies opportunity areas where enhancements for biodiversity could be particularly valuable. At the time of writing the options, the LNRS was still emerging, thus options also referenced Conservation Target Areas and previous Nature Recovery Network mapping as a way to help steer net gain to suitable areas. The options considered relate particularly to how offsite delivery should be guided, but also whether higher BNG targets should be incorporated.

Table 1 - Policy options set 005d: Delivering mandatory net gains in biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a hierarchy for how 10% net gain as required through Environment Act should be delivered, particularly where on-site net gain is not possible.	The approach is in line with national expectations for net gain in biodiversity and would allow more flexibility to secure other types of benefits for sites too e.g. other types of onsite features not addressed by the BNG metric (as is the topic of option set G5).	There is an element of repetition of the national BNG legislation here which may not be necessary. The city has limited capacity for taking on additional biodiversity enhancement to the scale and specific standards required through the Environment Act/DEFRA metric. As such, whilst a policy could try to focus any off-site delivery in the local area, geographical constraints may limit its

Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas) in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.	The national guidance, and the BNG metric, are not as prescriptive about where off-site gains should be delivered, so this approach would provide some local steer about the Council's priorities. This policy would help to ensure that any off-site delivery of net gain would be to the benefit of the local area in first instance before options further afield are considered.	effectiveness and options further afield, even beyond the boundary, may be necessary regardless. Off-site delivery may actually deliver better outcomes for biodiversity if geared towards landscape-scale nature conservation. From a net gain perspective, it may be less effective forcing constricting delivery to local areas first (particularly onsite).
Option b Require higher than 10% net gain, in excess of the minimum requirements of the Environment Act (but subject to same exemptions as apply to national 10% requirement). Set out hierarchy for where this should be delivered if on-site not possible.	Recognises the importance of supporting biodiversity and acting on biodiversity decline nationally by setting a standard higher than the nationally imposed minimum.	10% net gain on sites as required by Environment Act is likely to be challenging enough in many areas of city. A higher target is not considered realistic/deliverable particularly on many smaller, constrained sites and could result in more off-site mitigation, as opposed to on-site measures. This off-site mitigation is unlikely to all be within the city, but instead via contributions to schemes across the wider county. There are other measures that can support biodiversity which are not recognised by the DEFRA metric and that would not

Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.		be boosted under this option. Eng. wildlife friendly features like bird boxes, insect hotels, hedgehog highways etc. Additional demands in terms of net gain could impact ability/viability to provide for other needs. The additional cost of this will affect the affordability and therefore selection of other policy approaches that are equally important.
Option c Do not include a policy addressing biodiversity net gain requirements as set out in Environment Act, defer to national guidance/policy.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments. It may be that this is brought into the NPPF at a national policy level instead.	The national requirements in the Environment Act are not informed by local context. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on off-site delivery elsewhere in city (and, as last resort, beyond city). Could result in limited benefit to local area.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Either option a, b or c (they are alternatives to each other).

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: The options relate to whether the Local Plan should include policy guidance setting out the Council's preference for how offsite biodiversity net gain should be provided, guiding this to the local area and the opportunities identified in the LNRS, before looking more widely (option a and b) or not to set any local guidance. Option b also weighs up an approach of requiring more than 10% biodiversity net gain.

In terms of sustainability impacts, the options most directly relate to **criterion 10. Biodiversity**. Options a and b are likely to have minor positive impacts for the criteria, though in practice they do not exceed national standards particularly and are principally focussed on articulating how the Council would wish to see BNG implemented in the city. Option a and b would both seek to try to ensure that even if biodiversity net gain cannot be delivered onsite, it would be guided to local areas in the city (particularly those that are also identified as opportunities in the LNRS), potentially reducing the risks that this would otherwise be provided much further afield and to minimal benefit to local biodiversity. Option b might result in more positive impacts because it would seek to secure higher proportions of BNG than the national 10% target, however, larger targets are less likely to be able to be accommodated on many of Oxford's constrained sites and would also likely reduce the pool of local offsite opportunities that could accommodate this where it is not able to be met onsite (meaning it may go further afield) - thus the benefit is likely to depend on implementation. Option c would still likely result in minor positive impacts, because of the national target of 10% BNG which would still apply to all applicable planning permissions, which is likely to result in positive improvements over time even without the benefit of local policy specifying the Council's preferences for how BNG should be implemented. Overall, the sustainability impacts are unlikely to vary significantly between the options and it is not considered necessary to scope these in for further detailed appraisal.

Delivering mandatory net gains in biodiversity – draft Policy G4

The preferred approach is to take forward **option A**. This approach would maintain BNG requirements in line with national requirements, recognising that onsite delivery is already challenging on many constrained sites, but also that there are various other onsite

enhancements that the Council is seeking to drive forward to improve the environment and provide for biodiversity alongside the 10% habitat net gain as recognised by the DEFRA metric (e.g. draft policy on urban greening G3, draft policy G5 onsite ecological enhancements). This approach would also ensure that where onsite provision cannot be achieved, offsite provision is guided towards areas that most benefit the city and wider county, particularly focusing on the Local Nature Recovery Strategy areas once adopted.

Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

Whilst the national mandatory Biodiversity Net Gain (BNG) targets for planning applications promote habitat creation to support biodiversity, there are other needs for supporting species that are not recognised as part of the Environment Act's net gain requirements but that can still be highly beneficial. For example, the ways we design the urban environment can either support or hinder movement of species between habitats, meanwhile, certain species such as swifts and bats have adapted to rely on elements of the built environment for shelter where these spaces are designed in the right way. Habitat creation to satisfy BNG may also not always be able to be delivered onsite and so it is important to seek to secure other types of enhancements to support biodiversity too.

The options considered in the below table address the ways that the Local Plan can support biodiversity in other ways beyond BNG. They range from more prescriptive requirements that still retain some flexibility to meet needs of particular sites, to less prescriptive requirements or having no policy at all.

Table 2 - Policy options set 005e: Protecting and enhancing onsite biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Policy with prescriptive requirements to secure biodiversity features on site. • Could require a specific number of enhancements on each site selecting from a pre-defined 'biodiversity points list'	Highlights on-site biodiversity measures as a priority for the Local Plan/Oxford City Council. Policy could be tailored to challenges of delivering biodiversity net gain in a constrained city like Oxford. Would primarily seek to secure some sort of onsite improvement and support/fill	Every site is likely to be different, risk that a prescriptive list/point system could be too blunt a tool, limiting any benefits. On more constrained sites, the scope for biodiversity enhancements will still be challenging.

(e.g. bat box, bird box, wildflowers). • Points could be broken down into several pots/categories. • Potentially different points targets for householder, minors and majors applications. Could potentially be supported by updated Technical Advice Note (TAN).	in gaps left by Environment Act which may result in off-site compensation for on-site impacts. More specific targets (e.g. through point system) would be more practical to monitor and implement. A pre-defined list would provide guidance to applicants about what is most suitable for their site/location.	
Option b Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/or how much/or the standard of those measures. Could potentially be supported by updated TAN.	Highlights on site biodiversity measures as a priority for the Local Plan/Oxford City Council. Allows more flexibility than Option b for developers to work within the constraints of a site.	Less prescriptive policy and lack of quantifiable targets for what measures are expected could result in less effective policy and less influence on what comes forward. Without a minimum target, proposals may be more likely to fail at maximising opportunities on a site.
Option c No bespoke policy on supporting biodiversity on	Constrained city means achievable measures could have limited effect anyway,	The Environment Act requirements likely to have issues with achieving onsite net gain in many parts of city, resulting in off-site contributions, exemptions also, meaning net gain in real

site, instead, via complimentary policies (e.g. sustainable design and construction), include requirements to incorporate general ecological enhancements.	protection of established ecological sites nearby may be more effective overall.	terms could be limited. A specific policy would highlight this as a priority for the City Council, not including one could weaken this position. General encouragement of ecological enhancements means effectiveness of policy is harder to quantify and monitor.
Option d Do not include a policy for protecting and enhancing on site biodiversity, defer to national policy/standards.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments.	Environment Act 10% net gain is focused primarily on habitat creation which equates to habitat units and will have limited benefits for addressing wider needs of many species present in Oxford. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on offsite delivery elsewhere in city (and, as last resort, beyond the city). Could result in limited benefit to local area and lead to ecological impoverishment.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Either option a, b, c or d High-level screening conclusion? the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: The options presented set out alternative approaches for the Local Plan to address provision for onsite biodiversity beyond what is expected as part of the Environment Act 10% net gain requirements and could be treated as standalone alternatives to each other. Options a, b and c set out different ways that additional biodiversity enhancements could be secured through policy. Option d would mean no local policy requirements. In terms of sustainability impacts, the options all most directly address SA criterion 10. Biodiversity, whilst some of the enhancements that might be secured under the options could support criterion 7. green infrastructure, this would depend

on implementation (some biodiversity enhancements could instead take the form of other features like bird boxes, swift bricks, etc), so it is difficult to assess impacts. For criterion 10. Options a, b and c are all expected to have some varying level of minor positive impact, with more prescriptive requirements of options a and b likely to have a slightly more positive impact than option c, which has the potential to be a less effective approach. Option d is likely to have a neutral or minor negative impact for criterion 10. Whilst the net gain requirements of the Environment Act are likely to ensure key habitat features are identified on a site and a net gain of 10% biodiversity secured, this does not have to be onsite and could be provided for off-site and potentially outside of the city. Equally, the BNG process is focussed on habitat and may not fully address impacts on particular species onsite or in the surrounding area, meaning there is potential for new development to have harmful impacts if these are not mitigated through other mechanisms. Under criterion 7. Whilst this is dependent on implementation, options a, b and c could result in minor positive impacts where enhancements are in the form of greening and habitat creation measures, meanwhile option d would likely be neutral. Other than option d, the options for this policy are about securing additional benefit for biodiversity from development, and the impacts for sustainability are similar and not considered significant enough, regardless of option, to warrant detailed appraisal.

Protecting and enhancing onsite biodiversity – draft Policy G5

The preferred option for the draft policy is **option A** which would set prescriptive requirements for types of onsite ecological enhancements that are expected of development. This approach will help to provide clarity for applicants as to expectations and allow the Council to set out a list of features that would be most appropriate to the city's context and the needs of particular local species. Flexibility can be introduced to accommodate varying context of development sites by allowing applicants to pick a number of features from this list. The policy will complement the 10% BNG requirements and help to ensure that even where BNG cannot be delivered onsite, some provision for biodiversity is incorporated. There may be opportunities to tailor the list of features so that they complement the types of enhancements that the Local Nature Recovery Strategy identifies as opportunities within the city.

Policy options set 005f (draft policy G6): Protecting Oxford's ecological network

There is a range of sensitive species and habitats across the city which need to be considered in the development process. Onsite, there may be features already present that need to be investigated and appropriately addressed through the design process in order to mitigate impacts. Additionally, there are a range of designated sites across the city of varying national/local significance, and whilst the nationally

important sites benefit from high levels of protection through national policy, the locally valuable sites rely on Local Plan policies for their protection. The sites have varying characteristics and can be sensitive to different types of impacts from developments which applicants would need to consider.

The options set below includes options for addressing onsite biodiversity through the development process, as well as options for how to protect the wider ecological network across the city. These national and local designated sites would also be identified within the green infrastructure network (the subject of draft policy G1), and as such these options would set out additional considerations for development that could impact these particular sites in relation to their special biodiversity functions.

Table 3 - Policy options set 005f: Protecting Oxford's ecological network

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site.	There are often habitat/features/species that exist outside of designated sites in the city which are valuable and need to be protected where possible. Ensures developers assess potential impacts on legally protected species.	This would involve additional checks and assessment for applicants before commencing work.
Option b Include a policy which protects the city's network of national and local designated sites from development. Define hierarchy within the network, with level of protection based upon importance/value of	Ensures that the city's most important areas of habitat and species are protected from the direct and indirect impacts of inappropriate development in future. Also ensures that the level of protection is proportionate to the level of ecological interest.	Protecting designated habitats is important for supporting biodiversity in the city, however, there are likely to be other smaller/undesignated habitats which provide an important supporting/connecting role which will need to be safeguarded where possible also. Space in the city is under demand to deliver upon a variety of objectives, including providing for affordable/quality housing and jobs – these needs must be balanced with the need for

species/habitat they have been designated for such as: • International designations (SAC) • National designations (SSSIs) • Local sites like Local Wildlife Sites and Oxford City Wildlife sites. • Priority habitat. Reiterate national guidance for how to deal with irreplaceable habitats.	Protection of SACs, SSSIs and irreplaceable habitats set out in legislation/NPPF. No specific protection for locally designated sites, although the NPPF requires local plans to identify, map and safeguard such sites. Also acknowledges that there is differentiation in local designations where Oxford has multiple tiers of locally designated sites; notably, more stringent criteria area applied in designating local wildlife sites (LWS) versus Oxford City Wildlife Sites (OCWS). Also ensures protection of sites/habitats that are of notable ecological value but not previously identified through selection of designated sites.	protecting biodiversity, but will necessarily be limited as space is secured for other purposes like this.
Option c Set out that proposals will need to consider a range of	Recognises that there are different characteristics/qualities for	Whilst the approach would flag the range of considerations that applicants may need to consider and address in an application, the level of information needed to assess and

potential impacts depending on the context of application and proximity to any protected site(s), particularly, but not limited to: • Loss of protected land • Recreational impacts • Changes to the hydrological regime (groundwater, primarily), • Impacts on water quality • Impacts from air pollution.	which sites are designated and these are at risk from different impact mechanisms arising from development. For example, some sites in the city, such as the SAC and Lye Valley SSSI are particularly at risk from changes to hydrological regime (e.g. changes to groundwater flows and pollution impacting water quality). Others are at risk from other pressures. Provides a hook in policy from which to develop additional helpful guidance, potentially tailored to particular locations or types of sites (e.g. Technical Advice Notes) that can provide further detail for area specific requirements/considerations - - e.g. where applications impact a particular designated site.	justify no impact will vary depending on the level of protection on a site and type of application (e.g. likely a higher burden of information needed where proposal impacts a site protected through national legislation). Would be challenging to provide detailed steer on this at Local Plan policy level, and the level of assessment would need to be determined by the applicant through reference to the appropriate information.
Option d Include separate policies focussed on specific sensitive areas in the city, e.g. in	Particular considerations tailored to the specific risks to these areas could be set out	There is a network of ecological sites in the city and varying levels of national/local significance and

proximity to the Lye Valley, or the SAC, with bespoke requirements focussed on particular risks (e.g. changes to groundwater flows).	clearly for development coming forward nearby.	Focussing policy on particular risks to the areas might reduce the ability to look at wider impacts from development as a whole. There may be other adverse effects that particular developments may need to consider. There are other ways to provide more specific guidance on particular locations, e.g. Technical Advice Notes, which can be kept updated more regularly throughout the Local Plan's lifetime.
Option e Do not include a policy protecting biodiversity including ecological sites. Instead, defer to national policy/standards.	There is already legislation and national policy governing the upper levels of the hierarchy so may not be necessary to repeat that locally.	Particularly for local sites of ecological importance, the Local Plan is the key means through which these designations are protected from inappropriate development.

Initial sustainability appraisal screening of options sets	
Is there only one option or are there various options we could take? Various combinations e.g. option a, a+b, a+b+c, a+c, d High-level screening conclusion? the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: If not taking forward option e (no local policy), it is likely a combination of options that include option a would be taken forward. Option a sets out requirements for identifying what is already on a site and responding accordingly. The additional options presented are either to include a policy protecting a hierarchy of ecological sites, including those of national/international importance and those of local importance (option b), or to have more specific policies focused on particular areas (option d). Option c isn't an alternative, but rather an additional element that could be incorporated into option	

b which would set out additional guidance/expectations for proposals to consider a range of impacts that could cause harm to these sites.

In sustainability impacts arising from the options, these would most directly relate to SA **criterion 10. Biodiversity**. Whilst option a is likely to have a neutral impact, as it is about identifying the biodiversity features present on a site and mitigating any impacts from development, Options b and c would have minor positives for this criterion by helping to ensure that existing biodiversity onsite is identified/protected and that the most valuable sites in the city for ecology would be protected from harmful development, particularly the locally important sites that do not benefit from the same levels of protection in national legislation as the SAC and SSSIs (option c would just provide further detail about implementation in relation to dealing with adverse impacts). Option d would be similar, but more focussed to particular locations and would thus depend on implementation (which locations). Option e is likely to have neutral impacts in relation to the national sites (because they are already strongly protected at national level), however, there would potentially be minor negative impacts in relation to the local sites not protected in the same way through national policy.

Overall, the sustainability impacts of the options are principally focussed on mitigating impacts from development and protecting what is already there, so they are unlikely to differ significantly enough from each other to warrant detailed sustainability appraisal.

Protecting Oxford's ecological network – draft Policy G6

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of **options A, B and C**. Option **A** will help to ensure that development appropriately investigates and addresses any existing biodiversity on site in accordance with the mitigation hierarchy (e.g. seeking to avoid impacts before thinking about mitigating). Meanwhile options **B** and **C** mean that the Local Plan can identify and protect a the network of designated sites in the city, including locally important sites and set out the various considerations that applicants may need to take into account in order to avoid adverse effects. This should mean that applicants fully consider all the relevant information and potential impacts from their development, taking into account the varying characteristics of different sites around the city. The expectation would be that, where appropriate, additional guidance would be provided through technical advice notes which expand on the policy and help applicants to interpret its requirements, e.g. setting out how the Council expects them to avoid adverse effects in relation to particularly sensitive sites.

Background paper 006

Title: Green Belt

This paper addresses the protection of Oxford's Green Belt.	
Relevant Local Plan Objective(s):	
• 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. • 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.	
1) Introduction	1
2) National Planning Policy Framework (December 2024) and Planning Practice Guidance (updated February 2025).....	1
Grey belt	3
3) Methodology and summary of findings	4
Identification of grey belt	5
Assessing fundamental impact	5
4) Consideration of Green Belt parcels against the strategy of the OLP2045	6
5) Exceptional circumstances	7
Appendix 1 – Green Belt parcels showing results of filtering process (i.e. which were filtered through to the Green Belt assessment)	9
Appendix 2 – Results of Green Belt assessment and further consideration of development potential.....	38

1) Introduction

- 1.1 The Green Belt is an important strategic planning policy tool implemented to protect the rural surroundings of conurbations and prevent unmanaged ‘urban sprawl’. Within a localised context, the Oxford Green Belt offers protection to the historic setting of Oxford and to areas surrounding the city.

- 1.2 Green Belt should remain protected, with sites only released from this designated area after a thorough consideration of all other options. Areas in the Green Belt are protected in line with the [National Planning Policy Framework \(NPPF\)](#), last updated in December 2024.
- 1.3 Although the Government still attaches great importance to Green Belts and meaningful protections against development within it remain, significant changes were made in respect to Green Belt policy in the 2024 update to the NPPF. This included the introduction of 'grey belt' and how this should be identified. A second key change is set out in paragraph 146 of the NPPF which states that Green Belt boundaries should be reviewed by authorities who *"cannot meet their identified need for homes, commercial or other development through other means."* Further detail about how authorities should be undertaking reviews and identifying grey belt have been provided in an update to the Planning Practice Guidance (PPG), published in February 2025. These issues will be discussed further below, including how Oxford City Council has interpreted these changes and what the next steps will be.

2) National Planning Policy Framework (December 2024) and Planning Practice Guidance (updated February 2025)

- 2.1 The five purposes which Green Belt serves are unchanged in the latest [National Planning Policy framework \(NPPF\)](#) and are as follows:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.2 Paragraphs 144 and 145 of the NPPF express that the boundaries of established Green Belts across the country should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. When a Council is considering making changes to Green Belt boundaries, they must consider all other reasonable options for meeting its development needs, including:
 - a) making as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimising densities, including whether policies promote a significant uplift in minimum density standards in city and town centres, as well as other locations well served by public transport; and

- c) liaising with neighbouring authorities about whether they could accommodate some of the identified development needs.

2.3 As previously referred to in paragraph 1.3 of this background paper, paragraph 146 of the NPPF states that in this context, one of those exceptional circumstances includes not being able to meet the identified need for homes. The Government's Standard Method has been used to calculate the housing need for Oxford. This is currently 1,087 per annum, equating to a housing need for the 20-year plan period 2025-2045 of 21,740 homes. It is highly unlikely that the capacity of the city will be sufficient to meet this housing need, even when maximising brownfield land and underutilised land, optimising densities of sites and liaising with our neighbouring authorities as referred to in the previous paragraph. It should be noted that the unmet housing need arising from the current Oxford Local Plan 2036 was largely met through all neighbouring authorities allocating sites in their respective most recently adopted local plans, with some authorities releasing land in the Green Belt to accommodate this. At the same time, Oxford City also released Green Belt land through its Plan where it was identified to have the least harm, in order to ensure it was maximising its capacity. However, whilst this dealt with unmet need arising from the Oxford Local Plan 2036, the City Council is now undertaking a new Local Plan 2045, which is also highly likely to generate unmet housing need. As a consequence, Oxford City Council has commissioned Land Use Consultants (LUC) to undertake a review of the Green Belt in Oxford.

2.4 [Paragraph 001](#) (Reference ID: 64-001-20250225) of the National Planning Practice Guidance (PPG) related to Green Belt makes clear that there is an expectation for authorities to identify grey belt land in their review and where necessary, identify where land is grey belt for the purpose of determining planning applications. The PPG details that this should be done in accordance with paragraph 147 of the NPPF which is referred to in the previous paragraph in respect of maximising brownfield sites, optimising development density and liaising with neighbouring authorities, but also with paragraph 148. Paragraph 148 identifies that where release of Green Belt land is necessary, priority should be given to previously developed land, then to grey belt which is not previously developed and then other Green Belt locations. However, Paragraph 001 (of the PPG) also states that, *"where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances."* Assessing the contribution that Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. The application of the relevant NPPF policies should also inform any decision.

Grey belt

2.5 The glossary of the NPPF notes that not all the five purposes of the Green Belt should be used to identify grey belt. The three purposes below are identified as relevant to its identification:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;

d) to preserve the setting and special character of historic towns

- 2.6 Whilst the comprehensive details of how grey belt should be identified were not provided in the NPPF, the glossary did note that 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of three purposes (a, b or d) listed above. The glossary also noted that *"grey belt excludes land where the application of the policies relating to the areas or assets of particular importance in [footnote 7](#) (other than Green Belt) would potentially provide a strong reason for refusing or restricting development"* of the assessment area. Assets in footnote 7 refer to designations such as Sites of Specific Scientific Interest (SSSI), Local Green Spaces, designated heritage assets and areas at risk of flooding.
- 2.7 [Paragraph 003](#) (Reference ID: 64-003-20250225) of the PPG notes that after grey belt land has been identified, local authorities need to identify if the release or development of the assessment areas would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.
- 2.8 After discussions with Land Use Consultants (LUC), it was determined that the Green Belt assessment would be split into two parts. The first of these would focus on identifying grey belt land within Oxford and the second part would identify if release or development of an assessment area would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt.

3) Methodology and summary of findings

- 3.1 The methodology undertaken reflects the latest changes to the NPPF and PPG which have been discussed in the previous chapter and builds upon previous Green Belt assessments undertaken by LUC in Oxford in both 2017 and 2023. These assessments were based on the older methodology which focused on the level of harm (or otherwise) to the Green Belt that may result from their potential release for development, whereas the latest methodology is based on assessing the strength of the contribution that each parcel makes to each of the purposes of the Green Belt.
- 3.2 The first stage of the most recent assessment required Oxford City Council to determine the location, scale and most appropriate parcel size as set out in the [Paragraph 003](#) (Reference ID: 64-003-20250225) of the PPG. All green sites including those in the Green Belt are already in the Council's Strategic Housing Land Availability Assessment (SHLAA), therefore it was considered that any SHLAA site which contained any Green Belt would be looked at in the first instance. This resulted in an initial 121 parcels of or including Green Belt (one was subsequently split into two for allocation purposes), which can be found in Appendix 1 of this background paper.

- 3.3 A filter was then applied to exclude those sites that were either entirely or nearly all within greenfield Flood Zone 3b, or where the pattern of Flood Zone 3b would otherwise preclude development, a Site of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC). These are constraints that are considered to be included under footnote 7 of the NPPF and insurmountable to overcome, and therefore there is no development potential on these sites, because of these intrinsic constraints. The assessment of their performance against Green Belt purposes would therefore be entirely academic and not required. Other constraints such as Registered Parks and Gardens, Flood Zones 2 and 3a and brownfield 3b, Local Wildlife Sites or anything else that could not definitely be assumed to be included under Footnote 7 of the NPPF were NOT used to exclude areas from the Green Belt assessment.
- 3.4 This exercise resulted in 25 new parcels to be further reviewed by LUC, with 18 from the previous assessments undertaken in 2017 and 2023 to be reviewed using the new methodology that assesses the strength of the contribution to each of the five purposes of the Green Belt, rather than assessing the level of harm of releasing the parcel from the Green Belt.

Identification of grey belt

- 3.5 The first part of the assessment undertaken by LUC was to identify if any of the assessment parcels could be identified as grey belt. As referred to in paragraph 2.5 of this background paper, only the strength of contribution to three of the five purposes (a, b and d) can be considered when identifying grey belt. LUC have made clear in their assessment that none of the assessed parcels were identified as making any contribution to purpose B (prevent merging of towns), therefore only the strength of contribution to purposes A (check unrestricted sprawl) and D (preserve the setting and special character of historic towns) have been further analysed.
- 3.6 Further detail of how strength of contribution has been assessed can be found in chapter 3 of the [Oxford Local Plan Green Belt Assessment of Additional Sites](#) (LUC, June 2025). Using that methodology, **12 of the 25 new parcels, and part of one other** (split into two for assessment purposes) have been identified as grey belt. After reviewing the 18 previously assessed parcels, **3** were identified as grey belt. The sites that have been identified can be found in Tables 4.1 and 4.2 of the 2025 Oxford Local Plan Green Belt Assessment referred to above.
- 3.7 [Paragraph 001](#) (Reference ID: 64-001-20250225) of the PPG supports the position that grey belt parcels are not all developable. As the Oxford Local Plan 2045 has developed, they have been considered alongside other parts of the Green Belt, which are not grey belt, to see if any of them warrant further consideration.

Assessing fundamental impact

- 3.8 The second part of the assessment LUC undertook was to address paragraph 146 of the NPPF and to ascertain whether any alterations to Green Belt boundaries would *“fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”*. [Paragraph 008](#) (Reference ID: 64-008-20250225) of the PPG states that this judgement should focus on evaluating the effect of release or development on *“the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”*. LUC acknowledge that this can be most clearly judged at a later stage in the planning process, when there is a detailed set of development options, and the cumulative impact of their release can be considered. Nevertheless, any *potential* for development in a particular location to ‘fundamentally undermine the purposes’ can be assessed at this earlier stage of the process.
- 3.9 More detail on the interpretation of what is a fundamental and meaningful impact on each of the five purposes is discussed in paragraphs 3.82-3.87 of the Green Belt Assessment of Additional Sites (LUC, December 2025). In the absence of specific proposals, LUC has highlighted the areas where Green Belt contribution is at its greatest. These areas of highest contribution have been reviewed in the round to judge where there is *potential* for development (this would be dependent on the exact nature of development which is unknown) to fundamentally and meaningfully undermine the purposes. This has been undertaken for each of the 25 new parcels and for those 18 previously reviewed.
- 3.10 Using that methodology, 21 of the 25 new parcels have been identified as not having the *potential* to fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. Of the previously reviewed sites, 13 of the 18 parcels, and part of two others (split into smaller parcels for assessment purposes) have also been assessed as **not** having the *potential* to fundamentally undermine the five purposes of the remaining Green Belt within the plan area. The sites that have been identified can be found in Tables 4.1 and 4.2 of the [Oxford Local Plan Green Belt Assessment of Additional Sites](#) (LUC, 2025).

4) Consideration of Green Belt parcels against the strategy of the OLP2045

- 4.1 Not all parcels which do not fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan are developable, just as not all grey belt is developable. These parcels, and those which were assessed as having potentially fundamental impacts on the Green Belt purposes, have all been considered alongside the identified grey belt parcels, to see if any of them warrant further consideration and to assess against other aspects of the spatial strategy.

- 4.2 Many parcels have strong reasons for protection, such as Registered Parks and Gardens, and the Core Green Infrastructure (GI) network, which includes important parks such as Cutteslowe and Sunnymead. Development on these areas would undermine the spatial strategy of the plan, so these are not taken forward for further consideration. Other sites, both grey belt and Green Belt, do merit further investigation for development potential.
- 4.3 Further investigation has included checking issues such as potential access and traffic impacts, biodiversity issues and landowner interest. Appendix 2 sets out which parcels were assessed as grey belt and the parcels where development may have a fundamental impact on the Green Belt purposes. It then sets out whether development on the site would be otherwise contrary to the strategy of the plan, or not feasible, in which case it was not considered further.
- 4.4 Appendix 2 shows that many of the Green Belt sites assessed are Core Green Infrastructure, so to allocate them for development would be contrary to the Plan's strategy. Some sites have a green infrastructure function (playing pitches/sport) but are not designated Core Green Infrastructure. These were explored further; however, nearly all were found to be in use and all with no landowner or leaseholder intention to develop, or in a few cases are not practically developable because of their cut-off locations and surrounded by watercourses. One exception is part of site 298, Hertford College Sports Ground. On this site, the landowner is interested in bringing the site forward for an alternative use, but the landowner does not have a current strategy for bringing the site forward for an alternative use and re-providing the sports pitches. The exception is site 114e, which was assessed as part of a larger parcel, mainly in the ownership of the Oxford Preservation Trust (OPT). This site is a farmhouse and its curtilage, including garden and hard standing as well as trees and grass. The landowner has put forward the site for housing development. The site is allocated as SPE9, with a minimum housing capacity of 20 units. The site is considered to be grey belt, because it meets the definition of previously developed land. However, in order to be allocated for housing in the Local Plan 2045, the Green Belt boundary must be amended and this site removed from the Green Belt. Therefore, an exceptional circumstances case must be made

5) Exceptional circumstances

- 5.1 The NPPF sets out that strategic plan making authorities should have examined all other reasonable options for meeting its identified development needs before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. The criteria to be considered are whether the Plan's strategy makes as much use as possible of suitable brownfield sites and underutilised land, including by optimizing the density of development, and whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the need identified for development.
- 5.2 The plan's strategy has been to consider every potential site for development, fully utilizing all potential opportunities on brownfield land. Background Paper 015 - Developing Local

Plan 2045 Site Allocations sets out how sites have all been considered, and the SHLAA 2026 sets out the process in more detail. The capacity assessments are based on an assumption of high but appropriate densities, as set out in Background Paper 016: Efficient Use of Land. All opportunities to focus development on brownfield sites and maximise their capacity have been taken. In addition to this, discussions have continued with neighbouring districts about production of the Plan. Extant plans in neighbouring districts include releases of Green Belt, with exceptional circumstances that justified their release being the need to accommodate Oxford's unmet need. Therefore, to not look at Green Belt whilst asking for unmet housing need to be accommodated in neighbouring districts, which may then require Green Belt release, is not a good foundation for unmet need discussion. Looking to Green Belt for housing development potential is a justified approach.

- 5.3 In order to establish the need for any changes or alterations to Green Belt boundaries, a set of exceptional circumstances needs to first be demonstrated. Demonstrating exceptional circumstances requires the presentation of a set of factors that come together to override the normal presumption that Green Belt boundaries should endure. There is no formal definition or standard set of assessment criteria for assessing 'exceptional circumstances'. Rather, it is for the local planning authority to determine whether exceptional circumstances exist to justify removing land from the Green Belt.
- 5.4 Although national planning policy does not explicitly define the phrase "exceptional circumstances", there is a considerable amount of case law on its meaning in the context of reviewing Green Belt boundaries through the Local Plan process. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. Oxford City Council considers that the following make up the set of factors that come together to override the normal presumption that Green Belt boundaries should endure (exceptional circumstances).
- 5.5 Oxford's historic housing need is well-documented and Oxford has been unable to meet its housing need for decades. The housing need in Oxford calculated using the Government's Standard Method is 21,740 dwellings over the Plan period. The Capacity of the city is calculated in the SHLAA 2026 as 9,267 dwellings over the Plan period. That means that, over the Plan period, there is an unmet housing need of 12,478 generated from Oxford. As Oxford's housing need is already being accommodated through the Local Plans of neighbouring authorities, Oxford must demonstrate that it is doing all that it can to locate as much of its own housing need as can be sustainably accommodated within the city, without resulting in detrimental impacts to the special character and historic setting, which give Oxford some of its unique qualities – qualities important to maintain in order that Oxford remains an attractive place to both live and work.
- 5.6 Oxford's potential for growth has been well-documented and addressing the barriers to this growth is imperative for the national, sub-regional and local economy. Oxford is an

international city, it is successful, vibrant and a national economic asset. It is the focus of a world-class knowledge economy with one of the most important concentrations of high-value businesses in Europe. It is a global brand, known all over the world for its academic excellence and historic significance. Oxford's historic undersupply of housing has resulted in a housing shortage. This housing shortage is widely recognised as one of the key barriers to economic growth facing not only the city, but also the sub-region and more widely the UK.

- 5.7 All options to accommodate need outside of the Green Belt have been fully explored, but a high need for housing remains. This high need for housing has detrimental impacts for people and also for the economy. Exceptional circumstances exist for amending the Green Belt boundary to allow for housing development. The proposed amendment to the Green Belt would have very limited impact, as the site is previously developed land and therefore grey belt. The landownership extends beyond the site allocation area into greenfield which means there are opportunities for the required enhancements to open space required alongside Green Belt release.

Appendix 1 – Green Belt parcels showing results of filtering process (i.e. which were filtered through to the Green Belt assessment)

Key

Not taken forward for Green Belt assessment due to intrinsic constraints	Previously been assessed	Put forward for Green Belt assessment	Not put forward for Green Belt assessment for specific reasons as outlined

1249

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
25	Oxford Sports Park	15.9	Sports facilities. Most of site within Green Belt	GI supporting network	n/a	n/a		Put forward to be assessed in 2025
62	Univ of Oxford Science Area & Keble Road Triangle	12.43	A very tiny proportion of site is within Green Belt (already built on)	Approx 270m from New Marston SSSI Adjacent to Oxford City Wildlife Site (OCWS) University Parks Adjacent to Local Wildlife Site (University Parks)	n/a	Adjacent to and part within Central (University & City) CA Within High Buildings Area Contains Listed Buildings Adjacent to Grade II listed Registered Park and Garden (University Parks)		Parcel is not included in LUC assessment as only a very tiny part is within Green Belt, and that part is already developed.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
67	Wolvercote Paper Mill	Site 4.94 but GB area only 5% of site (0.27ha)	Green Belt is only a small part of the site, most of which has been developed recently. The Green Belt part is greenfield.	Supporting GI	FZ3b (Green Belt part)	southern 'finger' of Green Belt in Wolvercote CA	n/a	Parcel not included in LUC assessment. The wider site has already been developed and the Green Belt part of the parcel is very small .
112a1	Hill View Farm	4.25 (formerly 3.52)	Part of site within Green Belt		n/a	n/a		Adopted site allocation, and site under construction (2025). Site expected to be developed within the Local Plan time period- only small part not removed from Green Belt, which did not need further assessment.
112a2	Green Belt Land at Cherwell Valley/Old Marston, (southern part of previous site 112).	12.8	greenfield- agricultural land	GI supporting network	Flood Zone 3a (5%) Flood Zone 3b (4%) (greenfield)	n/a	2017 assessment- high impact	Reviewed in the 2023 GB assessment, as part of the site assessed in 2017 has since been allocated in the 2036 LP (SP25 and SP26). However, the latest review concluded that this would not alter the change to the 2017 assessment findings of this part of the site.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
112b2	Green Belt Land at Old Marston	20.3	Entire site within Green Belt	Entire site within Green Belt Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill) Adjacent to Oxford City Wildlife Site (Victoria Arms Spinney) GI Network (Core and Supporting)	very small amount	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b3	Green Belt Land at Old Marston	2.7	Entire site within Green Belt	Entire site within Green Belt GI Network (Core) Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill)	FZ3b (nearly all)	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b4	Green Belt Land at Old Marston	7.4	Entire site within Green Belt	Entire site within Green Belt GI Network (Supporting)	n/a	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk-contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
112b5	Green Belt Land at Old Marston	5.7	Entire site within Green Belt	Entire site within Green Belt GI Network (Supporting)	n/a	n/a		Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
112b6	Land at Old Marston (formerly #112b(5-6))	2.7	greenfield-agricultural land	GI supporting network	all fz3b	n/a	2017 assessment-high impact	Assessed as one of six parcels in the 2017 assessment. Whilst one (112b2-1) was allocated in the 2036 LP (SP26), it was considered that the development of this allocation would not change the assessment of the other parcels in this site.
114	Field at Junction of Marsh Lane and Elsfield Road	1.84	Greenfield-tree/hedge lined grass	GI supporting network.	About 1/4 FZ3b	n/a	2017 addendum. Moderate-high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.
114a	Land at Marston Brook (Northern part)	3.56	Greenfield-pastoral and heavily treed in east.	GI supporting network	Small amount of FZ3b	n/a	2023 review of additional sites. Moderate-high impact	Reviewed in 2023 GB assessment.
114b	Showman's Field	2.18	Greenfield site with biodiversity value	GI Core Network. LWS	n/a	n/a	2017 addendum. Moderate-high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
114c	Marston Saints Sports Ground	0.98	greenfield- pitches drawn on.	GI supporting network.	n/a	n/a	No review as sports pitches.	Put forward to be assessed in 2025
114e	Marston Paddock Extension	0.51	Part of site within Green Belt	Part of site within Green Belt Site in Old Marston CA GI Network (Supporting)	n/a	n/a		Site was assessed as part of parcel site 114a. This part put forward by landowner and a separate site has been created and is proposed for allocation for housing
117	Land surrounding St Clement's Church	2.31	A very tiny proportion of site is within Green Belt	A very tiny proportion of site is within Green Belt GI network (Supporting) but adjacent to GI Network (Core) (St Clement's Church & Magdalen College Fellows Garden)	N/A	Entire site within St Clement's and Iffley Rd CA and adjacent to Central Area (University & City) CA and Headington Hill CA The site is close to two view cones and the high buildings area and adjacent to a listed building (St Clement's Church)		Site not included in GB assessment as only a negligible part is Green Belt.
118	Land rear of Meadow Court Flats (formerly Land to rear of Wolvercote Social Club)	0.52 (GB only tiny part- 0.07ha)	Greenfield- full tree cover.	GI supporting network.	N/A	n/a	2023 assessment - low impact	Included in the LUC 2023 assessment

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
126	Wildlife Corridor at River Cherwell 8	5.29 (GB same)	Greenfield - tree/hedge lined around perimeter and centrally, in a vertical direction	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
127	Wildlife Corridor North of South Hinksey	2.51 (GB same)	Greenfield - tree covered at southern end, maintained grass at northern end. Most of the site appears to be unmowed grassland with a few trees dotted within the site and along parts of the perimeter.	Core GI network	Whole site lies within FZ3b	n/a	n/a	Functional floodplain
129	Wildlife Corridor at River Cherwell 9	3.93 (GB same)	Greenfield - pastoral and tree/hedge lined around perimeter	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
131	Wildlife Corridor at River Cherwell 4	0.67	Greenfield - meadow and parkland, heavily treed along perimeter	Core GI network	Nearly all FZ3b	Site within Grade I listed Magdalen College Registered Park and Garden	n/a	Functional floodplain
133	Wildlife Corridor Adjacent North Hinksey Village	23.48	Greenfield.	GI Core Network. contains LWS	Nearly all FZ3b.	Very small part of site within Osney CA	n/a	Functional floodplain

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134	Wildlife Corridor at Christ Church Meadow	23.2 (GB same)	Greenfield - meadow and park with trees dotted around perimeter	Core GI network	Nearly all FZ3b.	Within Grade I Christ Church Registered Park and Garden and majority withing Central CA	n/a	Functional floodplain
135	Wildlife Corridor at River Cherwell 1	3.95 (GB same)	Greenfield - school playing field with some pitches marked on	Core GI network	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
136	Wildlife Corridor at River Cherwell 2	0.44 (GB same)	Greenfield - amenity open space/ sports pitches to the east and a play area within scattered mature trees to the west	n/a	Nearly 12% within FZ3b - forms a 'v' shape along the western and south eastern boundaries.	Within Central CA	2023 assessment - high impact	Included in LUC 2023 assessment
137	Wildlife Corridor at Seacourt	2.53 (GB area is 2.51)	Greenfield - heavily covered in trees except south eastern corner which appears to be maintained grass.	Core GI network	Nearly all FZ3b.	n/a	n/a	Functional floodplain
139	Wildlife Corridor at River Cherwell 3 (Angel and Greyhound Meadow #161)	5.28 (GB same)	Greenfield - meadows with a heavily treed perimeter and a row of trees separating the two meadows	Core GI network	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
142	Wildlife Corridor at River Cherwell 5	2.53	Wildlife corridor on banks of watercourse and including watercourse.	Adjacent to New Marston Meadows SSSI.	Small part FZ3b but including most the land	Within Central CA	n/a	Parcel is mainly river and the small part that is land is mainly FZ3b.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
144a	Wildlife Corridor at Marston Brook (northern part)	1.39	Greenfield, meadow adjacent to watercourse with perimeter made up of mature trees; accessible green space	Local Wildlife Site (Marston Brook Meadow), Core GI network	More than half FZ3b	n/a	2023 assessment - moderate-high impact	Included in 2023 assessment
144b	Wildlife Corridor at Marston Brook (southern part)	0.84	Greenfield, dense mature tree cover all over site, appears to be accessible to public	Adjacent to LWS, part of supporting GI network	N/A	n/a	2023 assessment - high impact	Included in 2023 assessment
145	Wildlife Corridor at River Cherwell 6	3.22	Greenfield, bordered by mature trees and hedgerows, private open space	Core GI Network. Adjacent to New Marston Meadows SSSI	Almost entire site (95%) in FZ3b	n/a	n/a	Functional floodplain
147	Wildlife Corridor North of Binsey	11.77	Greenfield, meadow adjacent to watercourse with perimeter made up of hedgerows, accessible green space	Core GI Network. Adjacent to watercourse, in proximity to Port Meadow SAC and Wolvercote SSSI	Two-thirds of site in FZ3b.	Small part within Binsey CA	n/a	This site, although nearly 12ha in size is awkwardly shaped and is fairly narrow in parts, following the shape of the adjacent watercourse. The patches of the site which lie outside FZ3 are surrounded by FZ3, and are therefore not suitable for development. Not to be included in review.

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148	Wildlife Corridor at River Cherwell 7	8.34	Greenfield, meadow (pasture?) adjacent to watercourse with perimeter made up of hedgerows, accessible green space	Core GI Network. Adjacent to watercourse, in proximity of New Marston Meadows SSSI	Almost all FZ3b	n/a	n/a	Functional floodplain
149	Wildlife Corridor at Godstow Holt	2.53	Greenfield, adjacent to watercourse and bordered by a number of designated sites; perimeter made up of hedgerows and mature trees	Core GI Network. Adjacent to watercourse, in proximity of New Marston Meadows SSSI, part of Core GI network	Around a third of the site in FZ3b	n/a	n/a	FZ3b (and FZ3a) lie within the eastern part of the site, with a significant part of the western side not within a flood zone. However, access is poor and most of the area surrounding the site lies within FZ3b apart from the northern perimeter, although this largely lies within FZ2. Not to be included in review.
150	Wildlife Corridor at West Godstow Road	0.42 (GB same)	Greenfield - unmaintained grassland with trees and shrubs along the perimeter	Core GI network	largely FZ3b.	n/a	n/a	Functional floodplain
151	Wildlife Corridor at St Edward's Boat Yard	0.76 (GB same)	Greenfield - dense mature tree cover across the entire site	Supporting GI network.	A quarter of the site lies within FZ3b.	n/a	2023 assessment - high impact	Included in 2023 assessment
152	Wildlife Corridor at Lower Wolvercote South of Godstow Road	2.57	Greenfield, meadow or pasture with paddock; adjacent to watercourse	Core GI network	Most of site in FZ3b	n/a	n/a	Functional floodplain

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153	Wildlife Corridor at River Cherwell 10	1.96	Woodland and pasture adjacent to watercourse	Supporting GI network In proximity of SSSI	Nearly half FZ3b	n/a	2023 assessment - where pasture and woodland parcels of site were considered separately (using refs 153a, 153b respectively). Moderate high impact.	Included in 2023 assessment
154	Wildlife Corridor at River Cherwell 11	6.8	Greenfield, comprises 2 parcels of meadow land that adjoin a watercourse. Perimeter is made of hedgerows and trees. A hedgerow also runs through the site separating the 2 parcels.	Directly adjoins watercourse, Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
155	Wildlife Corridor at Lower Wolvercote North of Godstow Road	3.66	Greenfield, comprises of a number of parcels (pasture, and a small area of woodland)	Core GI network, adjacent to allotments, Wolvercote Meadows SSSI, Oxford Meadows SAC and in proximity to other designated sites	Three quarters FZ3b	Within Wolvercote with Godstow CA	n/a	Much of the site is within FZ3b. The patches that don't lie within FZ3 are spread across the site and are largely immediately surrounded by FZ3b, making access unsuitable for any potential development. Not to be included in review.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
156	Wildlife Corridor at River Cherwell 12	1.22	Greenfield, local public park - Sunnymead Meadow, adjacent to watercourse and LWS	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
157	Wildlife Corridor at Hill Farm (site boundary updated)	2.78	Greenfield, pasture bordered on NE by A40 and with hedgerows on remaining perimeter	Supporting GI network	Very small part FZ3	n/a	2023 assessment - high impact	Included in 2023 assessment
158	Wildlife Corridor South of Pixey Mead	0.93 (GB same)	Greenfield - entire site is covered in trees	Core GI network Immediately adjacent to two SSSI	Over half FZ3b	Within Wolvercote with Godstow CA	n/a	Pattern of FZ3b precludes development.
159	Wildlife Corridor Adjacent to Duke's Meadow	0.85	Greenfield, scrub and woodland - adjoining railway line and canal	Directly adjoins Duke's Meadow OCWS	N/A	n/a	2023 assessment - moderate impact	Included in 2023 assessment

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163	Astons Eyot (#163a) and The Kidneys (#163b)	17.52	Green field, public park and nature reserve with diverse ecology including woodland, scrubland and meadows. Adjacent to watercourse	Designated wildlife site (OCWS), high level of biodiversity part of Core GI network	Some areas within FZ3, mainly confined to banks along the watercourse	Designated heritage asset	n/a	Put forward to be assessed in 2025
166	Banbury Road North Sports Club	3.48 (2.22 ha in GB - car park not included)	MUGA with pitches for football, hockey, tennis	Supporting GI network	n/a	n/a	n/a	Put forward to be assessed in 2025
178	Boults Lane Recreation Ground	1.8	Greenfield, comprises of football pitches (senior and junior)	Supporting GI network	n/a	Within Old Marston CA, Elsfield VC	n/a	Put forward to be assessed in 2025
179	Brasenose College and Queens College Sports Ground	9.13	Greenfield, comprises of playing pitches - including formal and informal spaces	Most of site in Core GI network, although Queens College SG (33% of site) is designated as Supporting GI network	about 80% FZ3b	n/a	n/a	Pattern of FZ3b precludes development.
180	Brasenose Farm Allotments	1.91	Mainly greenfield- allotments in active use, some historic barns in corner converted to kitchen architect business.	GI Core Network (except barns). Adjacent to Brasenose Wood and Shotover Hill SSSI	n/a	n/a	n/a	Put forward to be assessed in 2025

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182	Bullstake Close Allotments	1.61	Greenfield, allotments in active use	GI Core Network, allotments	98% FZ3b	n/a	n/a	Functional floodplain
183	Burgess Field (edge of Port Meadow)	35.52	Greenfield- scrub, grass, paths	GI Core Network, OCWS	1% FZ3b	n/a	n/a	Put forward to be assessed in 2025
186	Christ Church Meadow – South	0.87	Greenfield- treed riverside adjacent to meadow	GI Core network.	Nearly all FZ3b	Within Central CA	n/a	Functional floodplain
188	Court Place Farm – East	1.52	Greenfield- nature park	GI supporting network	N/A	n/a	n/a	Put forward to be assessed in 2025
189	Court Place Farm – West	9.98	Mix of brownfield and greenfield of the OXNAS integrated sport and leisure facility.	GI supporting network (outside of buildings)	Tiny part FZ3b	n/a	n/a	Put forward to be assessed in 2025
190	Court Place Farm Allotments	5.91	Greenfield- large allotments site, around half the site in active use.	GI Core Network	n/a	Within Old Marston CA	2017 Assessment divided into parcels 190-1 and 190-2 and both assessed to have a moderate-high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings.
192	Cowmead Allotments	3.49	Greenfield- allotments in active use.	GI Core Network, allotments	Nearly all FZ3b	n/a	n/a	Functional floodplain
193	Cripley Meadow Allotments	6.02	Greenfield- allotments	GI Core Network	about 70% FZ3b	n/a	n/a	The patches of site not within FZ3 are scattered across the site and therefore not appropriate to consider for development as flood risk across the site is high.

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194	Cotteslowe Park 1	2.79	Greenfield-cricket field	GI Core Network	n/a	n/a	n/a	Put forward to be assessed in 2025
195	Cotteslowe Park 2	13.51	Greenfield and brownfield. Traditional large park with formal planting, duck pond, play areas, aviary, miniature railway, community centre and collection of buildings including nursery greenhouses, depots and a cabin used as an office.	GI Core network.	n/a	n/a	n/a	Put forward to be assessed in 2025
196	Cotteslowe Park 3	11.5	Greenfield- grass playing pitches within Cotteslowe Park	GI Core Network, playing pitches	N/A	n/a	n/a	Put forward to be assessed in 2025
197	Cotteslowe Park 4	7.95	Greenfield-grassland area of large Cotteslowe Park	GI Core Network	Part FZ3b	n/a	n/a	Put forward to be assessed in 2025
198	Cotteslowe Park Allotments	2.38	Greenfield-western half allotments, eastern half woodland.	GI Core Network, half allotments	n/a	n/a	n/a	Put forward to be assessed in 2025
209	Fairacres Road Allotments	0.79	Greenfield-allotments	GI Core Network	Less than 1% FZ3b	n/a	n/a	Put forward to be assessed in 2025
215	Former Abingdon Road Allotments	0.86	Greenfield-former allotments completely overgrown with thick scrub and trees	GI Core Network	Nearly 80% FZ3b	n/a	n/a	Pattern of FZ3b precludes development.

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217	Former Binsey Lane Allotments	3.78	greenfield- grassed-over former allotments	GI Core Network	Nearly all FZ3b	n/a	n/a	Functional floodplain
223	Goose Green (South-West of Goose Green Close)	1.95	greenfield- grass and tree common land	GI Supporting Network, designated Common Land,	part FZ3b (west and north edges)	Within Wolvercote with Godstow CA	n/a	Designated Common Land
225	Grandpont Sports Ground	4.27	Greenfield (Hogacre Common Eco Park)	GI Core Network,	Nearly all FZ3b	n/a	n/a	Functional floodplain
251	Merton College Sports Ground	5.29	Greenfield- mown college sports/recreation ground with cricket and football pitches and tennis courts	GI Supporting Network	very small amount of FZ3b	Within Central CA	n/a	Put forward to be assessed in 2025
252	Merton Field	3.5	Greenfield- grass university playing fields- cricket pitches	GI Core network	n/a	Within Central CA	n/a	Put forward to be assessed in 2025
267	Oxford Golf Centre	3.15	Entire site within Green Belt	Entire site within Green Belt GI Network (Core)	Nearly all FZ3b	Adjacent to Adopted OHAR		Functional floodplain

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274	Park Adjacent Rowing Clubs	1.21	Greenfield- heavily treed area	GI Supporting Network	Part within FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function.
275	Part Trinity and Magdalen Sports Grounds – North	7.76	Greenfield- grass college playing fields including cricket pitches and tennis courts	GI Supporting Network	N/A	Small part within St Clement's and Iffley Road CA, contains listed building	n/a	Put forward to be assessed in 2025
278	Pembroke College Sports Ground	3.43	Greenfield- tree-lined grass college playing fields withing green floodplain corridor.	GI Core network	100% FZ3b	n/a	n/a	Functional floodplain
279	Port Meadow	165.93	Greenfield- ancient meadow floodplain with cattle grazing.	GI Core Network, SAC/SSSI	86% FZ3b	Two Scheduled Monuments located within site	n/a	SAC/SSSI
290	Shotover Country Park	8.01	Greenfield- well-established woodland and grass- country park	GI Core Network, SSSI	n/a	n/a	n/a	SSSI

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298	St Catherine's, Exeter, and Hertford Colleges Sports Grounds	10.86	Greenfield- grass college playing fields (including two cricket pitches)	GI Supporting Network	A third FZ3b	n/a	n/a	Put forward to be assessed in 2025
311	Sunnymead Park	7.87	Heavily treed park with mown grass areas and paths.	GI Core Network.	8% FZ3b	n/a	n/a	Put forward to be assessed in 2025
315	The Harlow Centre Playing Fields	5.96	Site includes most of the Swan School and Swan School playing fields.	Playing fields are GI Supporting Network	n/a	n/a	n/a	Not to be included in review - new secondary school and associated playing fields
323	Trap Grounds Allotments	3.71	Greenfield- allotments	GI Core Network. Allotments	84% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
325	University College Sports Ground	4.26	Greenfield- mown, tree-lined pitch	GI Core Network	Nearly all FZ3b	n/a	n/a	Functional flood plain
326	University Parks	33.02	Greenfield well-used open space with areas of pitches, mature trees, areas of semi-natural grassland and riverside vegetation.	GI Core Network, LWS/OCWS	Small part FZ3b	Within Central CA	n/a	Put forward for assessment in 2025

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347	Iffley Meadow	7.15	Greenfield-meadow	GI Supporting Network	Small part FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function.
364	Donnington Bridge Road Riversports Centre and City of Oxford Rowing Club	3.221	Site is split into two parcels; to the north and south of Donnington Bridge Road. Both are predominantly brownfield containing various buildings related to more than one rowing club as well as the Sea Cadets and Sea Scout Group.	n/a	Over 1/4 FZ3b.	n/a	n/a	Southern parcel is mainly within FZ3. The southern half of the northern parcel lies outside of FZ3, but is mainly within FZ2 and is currently in active use by the Falcon Rowing and Canoeing Club.
380	Iffley Road Sports Centre (west)	1.984	Northern part of site is not Green Belt and has sports buildings. Southern part in GB is artificial pitch.	GI Supporting Network	Most of Green Belt part of site FZ3b	n/a	n/a	Green Belt FZ3b
390	Land at Wolvercote Viaduct (west of canal)	0.487	Greenfield grass floodplain	GI Core Network	Mainly FZ3b	n/a	n/a	Functional floodplain
391	Land at Wolvercote Viaduct	1.887	Greenfield- marsh habitat	GI Core Network, LWS (Oxford Canal Marsh)	Mainly FZ3b	n/a	n/a	Functional floodplain

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	(east of canal)							
393	Land east of Abingdon Road (south)	0.923	Greenfield- mown college sports/recreation ground	GI Core network	Part FZ3b	n/a	n/a	The site was not taken forward for assessment by LUC because it was nearly fully in FZ3b. The change to the flood mapping in the SFRA L1 shows only part of the site in FZ3b. It is still a greenfield site in FZ3b, but for the purposes of this assessment it would have been assessed for Green Belt function. However, there is no landowner interest and it is a sports ground.
403	Manor Farm, Binsey	1.496	Greenfield, farm buildings and treed area, listed building within site.	n/a	Part FZ3b	Listed building within site. Within Binsey CA.	n/a	Site all at flood risk, though little FZ3b, but site surrounded by a large area of FZ3b with no potential for access except through this area of high flood risk.
431	Walton Well Road Car Park	0.318	Parking area surrounded by trees and drainage ditches	n/a	Part FZ3b (southern and eastern edges)	n/a		Put forward for assessment in 2025

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464	Land adjacent Seacourt P&R	37.2	Greenfield-agricultural	GI Core Network, Scheduled Monument northern part of site.	82% FZ3b	Scheduled Monument in northern part of the site.	2017 Assessment-high impact	Reviewed in the 2023 GB assessment which notes that there are no GB allocations or other notable changes in the vicinity of the site that would affect the 2017 assessment findings, which concluded that its development would result in high harm to GB purposes. The 2023 assessment also concluded that there are no allocations in the Vale of White Horse DC Local Plan 2031 which would affect the 2017 assessment and that much of this area to the west of the A34 remains designated as SSSI and Ancient Woodland.
468a1	Sunnymead	4.19	greenfield- grass floodplain	GI Core Network	About 85% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
468a2	Land South of A40, Old Marston	11.38	Greenfield- grass floodplain	GI Core Network	About 85%FZ3b	n/a	n/a	Pattern of flood risk precludes development.
469	North of Botley Road/ around Binsey/ Cripsey Meadow	212	greenfield- meadows	GI Core Network, small part OCWS, small part LWS.	About 85%FZ3b	n/a	n/a	Pattern of flood risk precludes development.
470	North of Godstow Bridge	2.18	Greenfield, tree-lined hay meadow (West Cowleys Meadow).	GI Core Network, LWS.	Just under half FZ3b (southern portion of site)	n/a	n/a	Given location of flood risk and proximity of SSSI and SAC, do not include in review.

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471	North of Marston Ferry	3.84 (GB same)	Greenfield - pastoral and tree/hedge lined around perimeter	Core GI network	Nearly all FZ3b	n/a	n/a	Functional floodplain
473	SLINC west of Willow walk & site to east –an extension of Bulstake stream SLINC site.	17.56	Greenfield- meadows	GI Core Network, mainly LWS, remaining part OCWS	Nearly all FZ3b	n/a	n/a	Functional floodplain
474	Extension to site #127	6.62	Greenfield, heavily treed, watercourses, alongside railway.	GI Core Network.	Over half FZ3b (present throughout site but predominantly in the central region)	n/a	n/a	The lower area of flood risk is spread in patches across the site and most of the site is immediately surrounded by FZ3b, therefore do not include in review.
476	Land between HWRS and Kennington Road	2.76	greenfield, significant tree cover, large pylons.	Supporting GI network.	About 1/4 FZ3b (largely towards the north western and north eastern perimeter)	n/a	n/a	Given location of flood risk and only possible access road located in area of higher flood risk, do not include in review.
477	Principal Oxford Spire Hotel (formerly Four Pillars) including surrounding land (former #477a & #477b).	18.2	mainly greenfield with a hotel-trees, horse-grazed and grass pitches	Core GI network (except hotel). University pitch.	Nearly all FZ3b	n/a	n/a	Functional floodplain

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
478	OCWS to North of Weirs Lane (Long Bridge Nature Park)	2.53	greenfield- heavily treed area between watercourses	GI Core Network, half LWS, other half OCWS	Over 60% FZ3b	n/a	n/a	Pattern of flood risk precludes development.
479	Isis Farmhouse Pub and surrounding OCWS area	1.75	Isis farmhouse pub complex (very limited parking/hardstanding) and greenfield	middle of site is LWS, all Core GI network	100% FZ3b	n/a	n/a	Functional floodplain
480	Meadow Lane / opposite Isis boat house	1.84	Greenfield, footpath crosses site.	GI Core Network on northern half of site.	Nearly all FZ3b	n/a	n/a	Functional floodplain
489	Marston – gap between SSSI	5.13	Greenfield.	GI Supporting Network	Over 1/4 FZ3b	n/a	n/a	Put forward for assessment in 2025
490	Park Farm and adjoining OCWS	9.13	Brook runs through the site (Greenfield).	OCWS (Park Farm Meadows). Adjacent to SSSI.	About 85% FZ3b	n/a	2017 assessment - Moderate	Given location and level of flood risk, do not include in review.
491	East of Wolvercote Paper Mill site (Nixey's Field)	3.43	Greenfield	GI Core Network	N/A	n/a	n/a	Put forward for assessment in 2025

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
524	Wolvercote Green	2.14	Entire site within Green Belt	GI Network (Core) Part designated Common Land Oxford City Wildlife Site (OCWS) adjacent to site (Oxford Canal) This site is located within the Port Meadow with Wolvercote Common and Green SSSI	Around 85% in Flood Zone 3b (greenfield)	The entire site is located within the Wolvercote with Godstow CA Listed bridge/building adjacent to site		Pattern of flood risk precludes development.
534	Land north and west of Hogacre Common Eco Park.	19.5	Greenfield grass and trees (informal) publicly accessible natural green space.	GI Core Network	Nearly all FZ3b	n/a	n/a	Functional floodplain
536	Island Site North of Weirs Lane	0.82	Entire site within Green Belt	Part GI Network (Core)	N/A	A very small element of the site is located in a View Cone		Site is not suitable or available for development as it is a wooded site with a watercourse on both sides and no potential suitable access.
546	Sidling Island	0.31	Greenfield, wooded	Supporting GI network	100% FZ3a	n/a	n/a	Since sites were put forward to LUC for assessment, updates to the flood risk mapping have changed this site from 100% FZ3b to 100%FZ3a. Therefore, this site has not been assessed for its Green Belt purposes. However, the site is not a developable site, being a narrow site stranded between the river and the railway, as well as being a greenfield site at high risk of flooding.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
547	Fiddler's Island	1.66	Entire site within Green Belt	GI Network (Core) Oxford City Wildlife Site (OCWS) (Cripsey Island and Fiddler's Island) Site is Designated Common Land	84% in Flood Zone 3b (greenfield)	n/a		Pattern of flood risk precludes development.
548	Iffley Meadows - Off Donnington Bridge	33.6	Nearly entire site within Green Belt	Iffley Meadows SSSI GI Network (Core) Local Wildlife Site (LWS) (Longbridges Nature Park Fen) Oxford City Wildlife Site (OCWS) (Longbridges Nature Park)	90% in Flood Zone 3b (greenfield)	This site is part located within a View Cone		SSSI

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk-contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
550	Green Belt Land west of Iffley Road (rear of Iffley Road Sports Ground)	5.86	Greenfield-unmown grass, treelined, adjacent to Cherwell	Core GI network. Over half site LWS	Nearly all FZ3b	n/a	n/a	Functional floodplain
551	Land East of Wolfson College Boathouse	4.57	Entire site within Green Belt	GI Network (Core)	This site is located within the New Marston Meadows SSSI 90% in Flood Zone 3b	This site is located adjacent to the North Oxford Victorian Suburb CA		Functional floodplain
552	Land East of Wolfson College	0.95	Entire site within Green Belt	GI Network (Core)	Nearly all Flood Zone 3b	This site is located adjacent to the North Oxford Victorian Suburb CA Adjacent to listed building		Functional floodplain
553	Green belt land east of University Parks	42	Entire site within Green Belt	Located adjacent to Oxford City Wildlife Site (OCWS) (Park Farm Meadows) Entire site within Green Belt GI Network (Core)	This site is located within the New Marston Meadows SSSI 65% in Flood Zone 3b	This site is largely located adjacent to the Central (University & City) CA Part located within a View Cone		SSSI and significant amount of FZ3b.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
554	Long Meadow	11.3	Nearly entire site within Green Belt	Supporting GI	Nearly 80% in Flood Zone 3b	This site is located entirely within the Central (University & City) CA Adjacent to listed building Part located within the Historic Core Area and a View Cone		Pattern of food risk precludes development.
556	The Water Meadow	8.1	Entire site within Green Belt	GI Network (Core) Local Wildlife Site (LWS) (Magdalen Meadow)	90% in Flood zone 3b	This site is located entirely within the Central (University & City) CA This site lies within the Grade I listed Magdalen College Registered Park and Garden Adjacent to listed buildings Historic Core Area		Functional floodplain.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
557	Pixey Mead SSSI	10.7	Nearly entire site within Green Belt	Located adjacent to Local Wildlife Site Nearly entire site within Green Belt GI Network (Core) Site is Designated Common Land This site comprises two SSSIs (Pixey & Yarnton Meads and Wolvercote Meadows) Site wholly lies within Oxford Meadow SAC	Nearly 85% in Flood Zone 3b	The majority of this site is located within the Wolvercote with Godstow CA		Pattern of flood risk precludes development.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
558a	Hook Meadow and the Trap Grounds (West)	3.7	Entire site within Green Belt	GI Network (Core) Adjacent to Oxford City Wildlife Site (OCWS) (Burgess Field Nature Reserve) This site is located within the Hook Meadow & The Trap Grounds SSSI and adjacent to a SAC	Over 70% in Flood Zone 3b	n/a		SSSI and significant flood risk.
628	Seacourt Park & Ride	5.93	Part of site within Green Belt	Oxford City Wildlife Sites (OCWS) (Seacourt and Wytham Streams)	nearly 90% within FZ3b	n/a		Functional floodplain
636	Land off Mill Lane	0.33	Greenfield- grass with goal post and trees at edge.	GI Supporting Network	n/a	n/a	n/a	Put forward for assessment in 2025.

HELAA ref number	Site Name	Total site area (ha) and GB area if different	Site description	GI constraints (biodiversity, network, pitches, allotments)	Flood risk- contains FZ3b?	Statutory Heritage Designation	Green Belt review done? Which yr and outcome?	Summary- whether parcel is filtered in or out of further Green belt assessment.
670	St Hilda's College, Cowley Place	0.55	Part of site within Green Belt	Part of site within GI Network (Core) Site adjacent to Local Wildlife Site (LWS) (St Hilda's College Meadow)	About a quarter FZ3b	Site within Conservation Area Site within Historic Core Area		Only a very small part is within Green Belt so not assessed. in addition, landowner confirms no intention to develop.

Appendix 2 – Results of Green Belt assessment and further consideration of development potential

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
25	Oxford Sports Park	Most of site within Green Belt	GI supporting network	N	N	In intense sporting use, including as Oxford United training ground.
112a2	Green Belt Land at Cherwell Valley/Old Marston, (southern part of previous site 112).	greenfield- agricultural land	GI supporting network	N	N	Landowner interest but not put forward for allocation due to comments from Highways Authority that not feasible vehicular access could be obtained and would be car dependent development.

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
112b2	Green Belt Land at Old Marston	Entire site within Green Belt	Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill) Adjacent to Oxford City Wildlife Site (Victoria Arms Spinney) GI Network (Core and Supporting)	N	Y	Fundamental impacts, but still investigated further. County Council as Highway Authority clear that there is no feasible vehicular access and the site would be overly car-dependent.
112b3	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Core) Part of the site is a Local Wildlife Site (Almonds Farm and Burnt Mill)	N	N	GI core network and part LWS.
112b4	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Supporting)	N	N	No landowner interest confirmed (OPT)
112b5	Green Belt Land at Old Marston	Entire site within Green Belt	GI Network (Supporting)	N	N	No landowner interest confirmed (OPT)

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
112b6	Land at Old Marston (formerly #112b(5-6))	greenfield- agricultural land	GI supporting network	N	Part Y	No landowner interest confirmed (OPT)
114	Field at Junction of Marsh Lane and Elsfield Road	Greenfield- tree/hedge lined grass	GI supporting network.	N	N	Landowner confirmed no interest (OPT)
114a	Land at Marston Brook (Northern part)	Greenfield- pastoral and heavily treed in east.	GI supporting network	N	N	No landowner interest confirmed (OPT)
114b	Showman's Field	Greenfield site with biodiversity value	GI Core Network. LWS	N	N	Core GI network, LWS
114c	Marston Saints Sports Ground	greenfield- pitches drawn on.	GI supporting network.	Y	N	Leased and in sports use
114e	Marston Paddock Extension	Part of site within Green Belt	Site in Old Marston CA GI Network (Supporting)	N	N	Site was assessed as part of larger site 114a. This part put forward by landowner and so this separate site has been created and is proposed for allocation for housing
118	Land rear of Meadow Court Flats (formerly Land to rear of Wolvercote Social Club)	Greenfield- full tree cover.	GI supporting network.	Y	N	
136	Wildlife Corridor at River Cherwell 2	Greenfield - amenity open space/ sports pitches to the east and a play area within scattered mature trees to the west	n/a	N	Y	Magdalen College Playing Field. Watercourse on each side, only accessible by bridge from school grounds, no development potential, no landowner interest.

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
144a	Wildlife Corridor at Marston Brook (northern part)	Greenfield, meadow adjacent to watercourse with perimeter made up of mature trees; accessible green space	Local Wildlife Site (Marston Brook Meadow), Core GI network	N	N	GI core network, LWS
144b	Wildlife Corridor at Marston Brook (southern part)	Greenfield, dense mature tree cover all over site, appears to be accessible to public	Adjacent to LWS, part of supporting GI network	Y	N	GI core network, LWS
151	Wildlife Corridor at St Edward's Boat Yard	Greenfield - dense mature tree cover across the entire site	Supporting GI network.	N	N	Parcel does not have development potential- it is surrounded by water on three sides, with Port Meadow opposite on one side and Godstow Abbey on the other and no connected significant development. It has an access track to the boathouse and no potential for access to serve a development.
153	Wildlife Corridor at River Cherwell 10	Woodland and pasture adjacent to watercourse	Supporting GI network In proximity of SSSI	Y	N	GI core network
157	Wildlife Corridor at Hill Farm (site boundary updated)	Greenfield, pasture bordered on NE by A40 and with hedgerows on remaining perimeter	Supporting GI network	N	Y	Landowner confirmed no interest (OPT)

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
159	Wildlife Corridor Adjacent to Duke's Meadow	Greenfield, scrub and woodland - adjoining railway line and canal	Directly adjoins Duke's Meadow OCWS	Y	N	Site squeezed between the canal and railway with no opportunity for access that would support development.
163	Astons Eyot (#163a) and The Kidneys (#163b)	Green field, public park and nature reserve with diverse ecology including woodland, scrubland and meadows. Adjacent to watercourse	Designated wildlife site (OCWS), high level of biodiversity part of Core GI network	N	N	GI core network and OCWS
166	Banbury Road North Sports Club	MUGA with pitches for football, hockey, tennis	Supporting GI network	Y	N	Leased and high level of sports use
178	Boults Lane Recreation Ground	Greenfield, comprises of football pitches (senior and junior)	Supporting GI network	Y	N	Leased and high level of sports use
180	Brasenose Farm Allotments	Mainly greenfield- allotments in active use, some historic barns in corner converted to kitchen architect business.	GI Core Network (except barns). Adjacent to Brasenose Wood and Shotover Hill SSSI	Y	N	GI core network and allotments in active use, with historic barns at edge
183	Burgess Field (edge of Port Meadow)	Greenfield- scrub, grass, paths	GI Core Network, OCWS	N	Y	GI core network and OCWS
188	Court Place Farm – East	Greenfield- nature park	GI supporting network	Y	N	Leased and high level of sports use

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
189	Court Place Farm – West	Mix of brownfield and greenfield of the OXRAS integrated sport and leisure facility.	GI supporting network (outside of buildings)	Y	N	No landowner interest confirmed (OPT)
190	Court Place Farm Allotments	Greenfield- large allotments site, around half the site in active use.	GI Core Network	N	N	GI core network
194	Cotteslowe Park 1	Greenfield- cricket field	GI Core Network	Y	N	GI core network
195	Cotteslowe Park 2	Greenfield and brownfield. Traditional large park with formal planting, duck pond, play areas, aviary, miniature railway, community centre and collection of buildings including nursery greenhouses, depots and a cabin used as an office.	GI Core network.	Y	N	GI core network
196	Cotteslowe Park 3	Greenfield- grass playing pitches within Cotteslowe Park	GI Core Network, playing pitches	N	N	GI core network
197	Cotteslowe Park 4	Greenfield- grassland area of large Cotteslowe Park	GI Core Network	N	N	GI core network
198	Cotteslowe Park Allotments	Greenfield- western half allotments, eastern half woodland.	GI Core Network, half allotments	Y	N	GI core network, half allotments
209	Fairacres Road Allotments	Greenfield- allotments	GI Core Network	Y	N	GI core network
251	Merton College Sports Ground	Greenfield- mown college sports/recreation ground with cricket and football pitches and tennis courts	GI Supporting Network	N	N	Sports ground with no landowner interest
252	Merton Field	Greenfield- grass university playing fields- cricket pitches	GI Core network	N	Y	GI core network

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
275	Part Trinity and Magdalen Sports Grounds – North	Greenfield- grass college playing fields including cricket pitches and tennis courts	GI Supporting Network	N	N	Landowner confirmed no interest
298	St Catherine's, Exeter, and Hertford Colleges Sports Grounds	Greenfield- grass college playing fields (including two cricket pitches)	GI Supporting Network	N	N	Landowners confirmed no interest except Hertford College Sports Ground. That area made into separate site 676 within this larger site.Site in active use for sports provision. Whilst landowner has indicated interest in developing for residential use at the same time they have said their primary intent for the site is to keep it in sports use, and it has not been demonstrated that the sports facilities are surplus or can be re-provided.
311	Sunnymead Park	Heavily treed park with mown grass areas and paths.	GI Core Network.	N	N	GI core network
326	University Parks	Greenfield well-used open space with areas of pitches, mature trees, areas of semi-natural grassland and riverside vegetation.	GI Core Network, LWS/OCWS	N	N	GI core network, OCWS and LWS
431	Walton Well Road Car Park	Parking area surrounded by trees and drainage ditches	n/a	N	N	The site includes FZ3b and drainage ditches that make the developable area very small. In addition, it is currently in use as the main public car park for visitors to the south of Port Meadow. The site is also in a highly sensitive area adjacent to the SAC and SSSI. Not considered suitable for development.

HELAA ref number	Site Name	Site description	GI constraints (biodiversity, network, pitches, allotments)	Grey belt?	Potential for development to have fundamental impact	Further considerations
464	Land adjacent Seacourt P&R	Greenfield- agricultural	GI Core Network, Scheduled Monument northern part of site.	N	Y	GI Core Network, part Scheduled Monument
489	Marston – gap between SSSI	Greenfield.	GI Supporting Network	N	Y	Landowner confirmed no interest (OPT)
491	East of Wolvercote Paper Mill site (Nixey's Field)	Greenfield	GI Core Network	Y	N	GI core network
636	Land off Mill Lane	Greenfield- grass with goal post and trees at edge.	GI Supporting Network	Y	N	Landowner confirmed no interest (OPT)

Background paper 007

Title: Flood risk, SuDS and drainage

This paper addresses flood risk and new development including SuDS and drainage
Relevant Local Plan Objective(s): • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • 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
SA Objective(s): 2. To build resilience to climate change including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Water, climatic factors, human health

1. Introduction	2
2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	3
The Flood and Water Management Act, 2010.....	3
National Planning Policy Framework (NPPF).....	3
National Planning Practice Guidance (PPG)	4
New national flood and coastal erosion risk information	4
Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026.....	4
Catchment Strategic Plan, Part of our Drainage and Wastewater Management Plan (DWMP) for Oxfordshire, Swindon, Wiltshire, Gloucestershire and Warwickshire, Thames Water, 2023.....	5
Our Catchment Plan, Thames Water, 2018	5
Oxford City Council “Our Strategy” 2024-28.....	6
Oxford Local Plan 2036 Policies on Flood Risk.....	6
Oxford City Sustainable Drainage Design and Evaluation Guide	6
3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)	7
Fluvial Flooding.....	7
Surface Water Flooding	9
Sewer Flooding	9

Strategic Flood Risk Assessment (SFRA)	10
Taking account of Climate Change impacts when looking at Flood Risk	10
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	11
5. Key issues addressed through the Local Plan 2045	12
6. Appendix A - Policy options and preferred approaches	15
Policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments	17
Flood Risk and Flood Risk Assessments - Policy G7	22
Policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDs)	22
Sustainable Drainage Systems (SuDs) - Policy G8	25

1. Introduction

- 1.1 Oxford is located at the confluence of two rivers, the Thames and the Cherwell, as well as numerous watercourses. The risk from river flooding is one source of flooding that has the potential to impact development in Oxford, with other sources including groundwater, surface water and sewer flooding. The ongoing impact of climate change, including projected wetter winters and increased incidences of intense rainfall events, is likely to exacerbate these risks in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health.
- 1.2 Oxford has a history of flood events with several occurring during 2024, where a number of flood warnings were issued, temporary defences deployed, several roads closed and footpaths along the city's waterways completely obscured. Other recent flood events were at the start of 2021, with more historic flooding events occurring in January 2014, November 2012 and July 2007, each of which resulted in significant disruption to the city. This series of flood events resulted in a programme of short-, medium- and long-term measures including the development of the Oxford Flood Alleviation Scheme (OFAS) - the primary purpose of which is to reduce the risk of flooding for properties and infrastructure.
- 1.3 This background paper provides a brief overview of some of the flooding issues in the city, including SuDS and drainage. It begins by taking a look at flooding from a policy perspective, reviewing relevant policies, plans and programmes at the national, regional and local level. It then goes on to set out the current situation for flooding in Oxford, looking at each source of flooding in turn and how they present a different set of issues. Then the paper moves on to look at what would happen if we didn't produce a plan before setting out what potential

topics could be included in the new plan. Finally, it draws out some of the key issues relating to flooding.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The Flood and Water Management Act, 2010

- 2.1 This piece of legislation requires better management of flood risk, creates safeguards against rises in surface water drainage discharges and protects water supplies for consumers. It gave a new responsibility to the Environment Agency for developing a National Flood and Coastal Risk Management Strategy, and established upper tier local authorities (in our case Oxfordshire County Council) as Lead Local Flood Authorities and provided them with a range of duties.

National Planning Policy Framework (NPPF)

- 2.2 Paragraphs 170-182 of the [NPPF](#) set out the policy for planning for development in flood risk areas. It requires a sequential approach to development: sites should not be allocated, or permitted, if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. It also requires an exception test for proposed development in areas of flood risk: this requires proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Paragraphs 180-181 focus primarily on planning applications and paragraph 182 states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. It is expected that these sustainable drainage systems will provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Local Planning Authorities need to have appropriate policies in place on sustainable drainage systems.
- 2.3 Paragraph 125 (b) of the NPPF recognises that some undeveloped land can perform many functions, including flood risk mitigation. The NPPF also requires that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies. The NPPF states that the SFRA will be the basis for determining the sequential approach to development. This is important as applicants need not apply the sequential test again on sites allocated in the development plan through the sequential test.
- 2.4 The NPPF was recently updated and published in December 2024, however there were not any significant amendments to the flooding policy. A few minor amendments were made to

the September 2023 version of the Framework, which included specifically referencing that improvements to green infrastructure and other forms of infrastructure can provide opportunities to reduce the causes and impacts of flooding as well as explicitly stating that as well as development being resistant and resilient to flooding, in the event of a flood, buildings should be able to be quickly brought back into use without significant refurbishment. Additionally, a separate Annex 3 was provided which classifies flood risk vulnerability.

National Planning Practice Guidance (PPG)

- 2.5 The [Flood risk and coastal change](#) section of the PPG was last updated in September 2025. Significant amendments were made in 2022 to bring the guidance up to date and in line with the latest policy position on flood risk introduced in the updates to the NPPF in 2018 and 2021. [Paragraph 078 refers to a table](#) which sets out the definition of the different flood zones:
- Flood Zone 1 has the **lowest** probability of flooding
 - Flood Zone 2 has a **medium** probability of flooding
 - Flood Zone 3 has a **high** probability of flooding
 - Flood Zone 3b is the **functional flood plain** and this zone comprises land where water has to flow or be stored in times of flood.
- 2.6 The key difference made in 2022, is that the definition of the functional flood plain (Flood Zone 3b) changed from an annual probability of 1 in 20 (5%) or greater in any year to 1 in 30 (3.3%) or greater in any year.
- 2.7 The PPG on Flood Risk and Coastal Change provides more detailed guidance as to the application of the sequential and exception tests in the context of plan-making and planning applications. It also provides additional information on the “sequential approach to the location of the development” and provides some over-arching guidance relating to “taking flood risk into account in preparing plans”.

New national flood and coastal erosion risk information

- 2.8 In December 2024, the Environment Agency published a new report summarising the changes to the [National assessment of flood and coastal erosion risk in England in 2024](#). In March 2025, [new national flood risk assessment \(NaFRA\)](#) was also made available. Its intention is to provide a single picture of current and future flood risk from rivers and the sea, and from surface water, using both the existing detailed local information and improved national data. This includes future scenarios accounting for climate change. This new flood zone data is expected to inform any new flood risk assessments, including those undertaken at a strategic level.

Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026

- 2.9 [The Flood and Coastal Erosion Risk Management \(FCERM\) Strategy for England](#) was published in 2020, with an initial 1-year action plan showing the actions needed, published

in May 2021. The Environment Agency has recognised that a longer-term view is now needed to implement the strategy and to address this, they have worked with partners to develop a roadmap. The roadmap contains practical actions out to 2026, which once completed will help to implement the strategy's 2100 vision. These include actions such as taking forward projects and programmes that will pioneer innovative ways of boosting flood and coastal resilience and make a difference to their local communities, as well as identifying practical ways in which flood and coastal investments can contribute to wider priorities, including local nature recovery, carbon reductions and more integrated water solutions that help with both flood and drought resilience.

Catchment Strategic Plan, Part of our Drainage and Wastewater Management Plan (DWMP) for Oxfordshire, Swindon, Wiltshire, Gloucestershire and Warwickshire, Thames Water, 2023

- 2.10 [Thames Water produced a strategic plan](#) which develops a strategy for the next 25 years to meet future challenges such as climate change and population growth which could impact the sewerage and drainage systems in the region. The document also illustrates the range of investment that is required for each of the catchments across the region (including Oxford) and identifies sewage treatment works that will need to be upgraded within the next 25 years to ensure treatment capacity keeps pace with growth.

Our Catchment Plan, Thames Water, 2018

- 2.11 [Thames Water produced a plan](#) which includes an analysis of the causes of sewer flooding and pollution in the Oxford catchment. These include heavier and more intense rainfall events happening more often; deterioration within the sewerage network and blockages caused by fat, oil and grease deposits, resulting in flooding and operational issues; loss of local river flood plains; and increasing river flooding. The report notes that the foul sewers were not designed to cope with surface water. For example, in the Grandpont area, the deterioration of some of the sewers within their network has allowed groundwater into the foul sewers. At Abingdon Road, flooding from surface water sewers has also occurred as a result of high river levels and / or restriction of the outfalls due to vegetation growth.
- 2.12 The Our Oxford catchment plan is currently at the Options Appraisal stage. Thames Water are recommending an intervention comprising short-, medium- and long-term measures. Short-term activities will include their ongoing work to improve the operation of their network and their response to problems as they occur. Medium term activities will include the refurbishment of their local sewerage network to reduce pollution and foul sewer flooding. Long term activities include the review and refinement of their catchment approach based on the experience gained, and outcomes achieved from the short- and medium-term interventions.

Oxford City Council “Our Strategy” 2024-28

- 2.13 The [City Council's “Our Strategy”](#) document sets out the importance of working with partners to deliver improved flood defences and managing the increased risks of flooding in order to help the city become more resilient to climate change.

Oxford Local Plan 2036 Policies on Flood Risk

- 2.14 The Oxford Local Plan 2036 is the current development plan for the city and it contains a number of policies that relate to flood risk. In particular, Policies RE3 and RE4 set out the City Council's approach to flood risk, sustainable drainage, and also provide the policy approach in relation to water management at some of Oxford's important nature conservation sites. Policy RE3 includes strict provisions as to what development will be granted planning permission in Flood Zone 3b. Any proposal must meet all of the criteria in this policy and must be for water-compatible uses or essential infrastructure; or, where it is on previously developed land, it must represent an improvement of the existing situation in terms of flood risk.
- 2.15 Policy RE3 was informed by the Flood Risk and Sequential Test of Sites Background Paper. In line with the associated guidance in the PPG, when developing site allocation policies, the sequential test was applied if any of the potential sites were outside of Flood Zone 1. Before allocating sites in higher risk flood zones, it was demonstrated that there were no reasonable alternative sites available in areas with a lower probability of flooding that would have been appropriate to the type of development or land use proposed. Any proposals for the development of sites in Flood Zone 3a that incorporated ‘more vulnerable’ uses such as housing also required the exception test. In the case of Oxford, where previously developed sites in Flood Zone 3b were proposed, an exception test was also required. Paragraphs 1.21 to 1.59 of our Statement of Common Ground with the Environment Agency provide more detail as to how the sequential and exception tests are applied in Oxford.
- 2.16 The Flood Risk and Sequential Test of Sites Background Paper set out the individual capacities of sites within each Flood Zone and demonstrated that Oxford had insufficient capacity to accommodate its housing need within lower risk flood zones. Consequently, development sites were allocated within higher risk flood zones applying the sequential test. These sites must be accompanied by a site-specific flood risk assessment when planning permission is sought.

Oxford City Sustainable Drainage Design and Evaluation Guide

- 2.17 In 2010 the Flood and Water Management Act proposed that sustainable drainage systems (SuDS) should be used on most development and this was confirmed in a ministerial statement in 2015 introducing the ‘non statutory technical standards’ for SuDS. The [evaluation guide to sustainable drainage](#) was published in 2018 and provides a link between the design of SuDS with the evaluation requirements. The design and evaluation guide promotes the idea of integrating SuDS into the fabric of development using the available landscape spaces as well as the construction profile of buildings. This approach provides

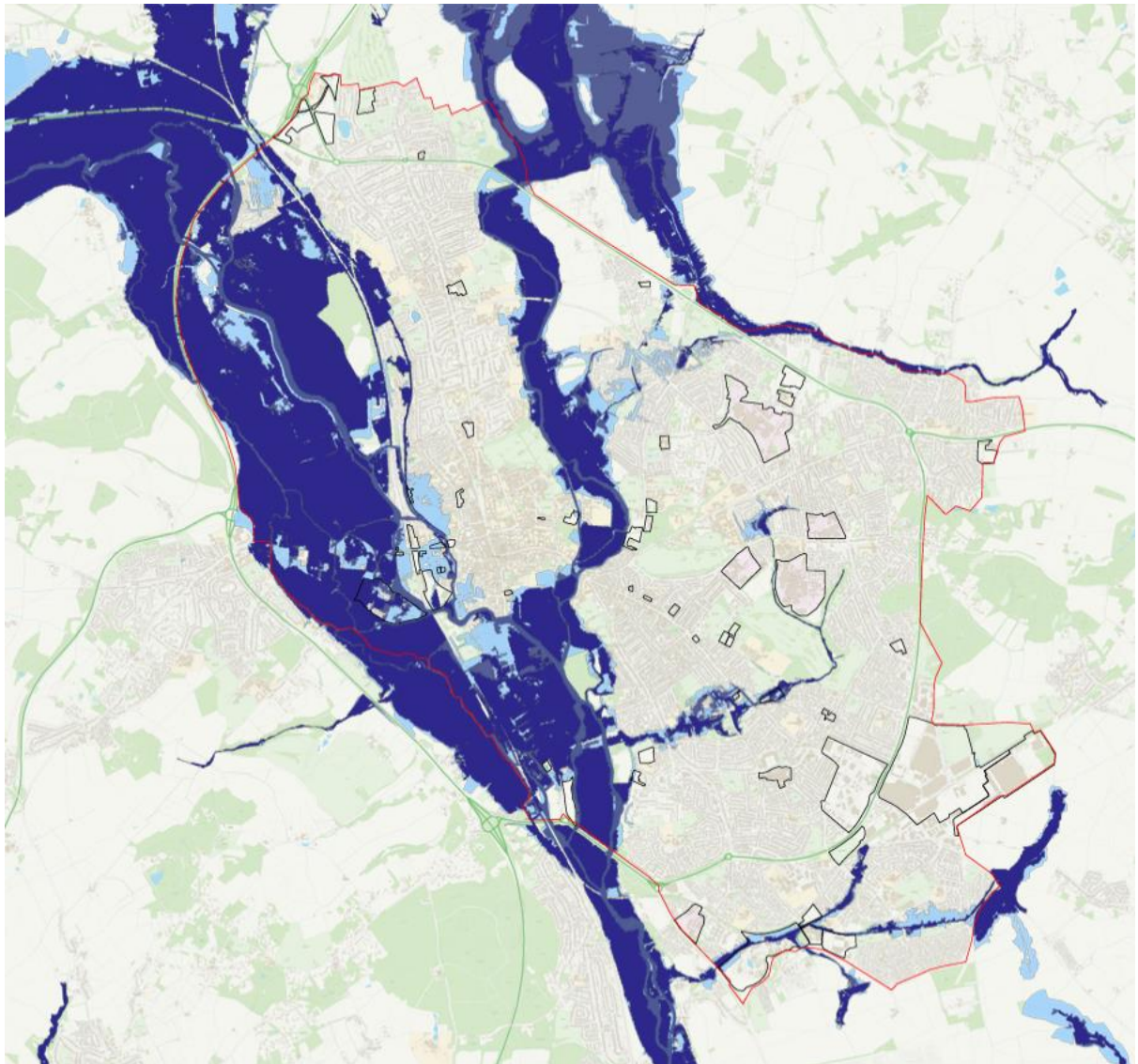
more interesting surroundings, cost benefits, and simplified future maintenance. This guide provides a background context for SuDS designs, taking into account the landscape character and local geology and provides advice on what type of SuDS is most suitable in Lye Valley; a Site of Special Scientific Interest (SSSI) with a unique nature, where special consideration to the type of SuDS must be given.

3. Current Situation (supporting Task A2 and A3 of Sustainability Appraisal)

- 3.1 In Oxford there are major technical obstacles which mean any solutions to flooding will be expensive, provide different levels of protection and not benefit everyone in the affected communities. Proposals can be brought forward that will reduce the risk to many people, but major flood defences are not a realistic option in the foreseeable future. The most sustainable way of managing flood risk in Oxford will be through a Flood Risk Management Strategy. As set out in the introduction, flooding occurs from a number of sources including groundwater, surface water, river, and sewage flooding. Each will be looked at in turn to present a current picture of what is happening in the city.

Fluvial Flooding

- 3.2 Fluvial (or river) flooding occurs when a river bursts its banks and water spills out onto the surrounding land. This type of flooding is caused by heavy rain. Fluvial flooding is the primary source of flood risk in Oxford in terms of flooding extent, the number of properties at risk and historical flood damages. Oxford is located at the confluence of the River Thames and River Cherwell, and is at risk from both watercourses independently, as well as concurrently in large flood events. As can be seen from Figure 3.1 below, large parts of Oxford are at risk from this type of flooding. Some areas of flood risk in Oxford allow the river to naturally burst its banks onto river floodplain, however other areas have properties in them.



Legend

- ▬ Oxford CC boundary
- Proposed Site Allocations

EA Flood Map for Planning

- Flood Zone 2 (0.1% - 1.0% AEP)
- Flood Zone 3a (>1.0% AEP)
- Flood Zone 3b (represented by the EA 3.3% AEP defended extent informed by the River Thames (2018) model)

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Figure 3.1 - Flood map showing risk of river flooding in Oxford (WHS, 2025)

Groundwater Flooding

3.3 According to the [Environment Agency](#), groundwater flooding:

“can happen when the level of water within rock or soil underground – known as the water table – rises. When the water table rises and reaches ground level, water

starts to seep through the surface and flooding can happen. This means that water may rise up through floors or underground rooms such as cellars or basements.”

- 3.4 The Environment Agency and British Geological Survey have investigated the nature and mechanisms behind groundwater flooding in Oxford. In the majority of cases, it has been found that local ground water is linked to river flows and has an independent response to rainfall. There is a lack of reliable data however, therefore a system of water level measurement points for future monitoring purposes has been established.
- 3.5 The Environment Agency holds and updates a groundwater flooding register identifying the locations and nature of specific groundwater flooding events. For Oxford, the groundwater register has identified 21 records of suspected ground water flooding. These occurred between 2000 and 2003 and 2007 and 2009. 15 of the incidents occurred within the city, whereas 6 were located just outside the city's boundary. Groundwater flooding tends to occur in low lying areas, with clusters of incidents in New Hinksey, Grandpont and New Botley. These three areas all lie within Flood Zone 3, so the groundwater incidents are likely to be associated with fluvial flooding.
- 3.6 Four of the incidents reported immediately to the west of the Cherwell-Thames confluence are within Flood Zone 1. The sites are located on gravels like those within the floodplain. Although the incidents took place within Flood Zone 1, the proximity of the Rivers Cherwell and Thames means that groundwater emergence is likely, especially during periods of high-water level in the two rivers.

Surface Water Flooding

- 3.7 Surface water (or pluvial) flooding happens when heavy rainfall overwhelms local drainage capacity. It is a significant risk affecting 3.2 million properties in England. Surface water flooding is **more** difficult to forecast than flooding from rivers as it is often caused by periods of intense rainfall. This is because “current meteorological methods are not able to pinpoint where or when potential intense rain will arrive, nor can they know or predict the capacity of local systems to manage the level of rainfall.” There are several high-risk areas near the city centre where surface water pools, including large parts of St Aldates and Speedwell Street to the south of the city, and George Street to the west. The Oxford City Level 1 Strategic Flood Risk Assessment (WHS, 2023) indicated that ground levels to the west and south of the city are lower than those in the city centre, which may explain why water is shown to pool in these locations. The greatest risk of surface water flooding is around certain roads pertaining to the areas of Jericho, Headington, Summertown, Woodstock Road and the city centre. Recent surface water flood incidents have been reported at the following locations:

Table 3.1 - Recently recorded surface water flood incidents

Area	Road	Year
Headington	Old Road	2020

Summertown	Summerhill Road	2020
Summertown	Water Eaton Road	2023
Woodstock Road	Blandon Close	2020

- 3.8 Most of the areas identified above tend to be located outside of the floodplains of the River Thames and River Cherwell, meaning that the main source of flooding shown in these areas is likely to originate from surface water flooding rather than from fluvial flooding.

Sewer Flooding

- 3.9 Sewer flooding is when sewage or foul water leaks from the sewerage system (through pipes, drains or manholes) or floods up through toilets, sinks or showers inside a building. The responsible authority for sewer flooding across in Oxford is Thames Water, the sewerage undertaker, who have confirmed that a total of 155 historic records of sewer flooding have been recorded within the Oxford City administrative area since records began. The most incidents have occurred in the built-up areas of New Hinksey, Grandpont, Botley, Osney and Marston.

Strategic Flood Risk Assessment (SFRA)

- 3.10 The NPPF requires local plans to be supported by an SFRA and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as Lead Local Flood Authorities (in this case, Oxfordshire County Council). The EA provides [guidance](#) on how to undertake an SFRA. The most recent SFRA was undertaken in 2023 to support the emerging Oxford Local Plan 2040 (now withdrawn). A Level 1 SFRA was initially undertaken which identified all flood risk areas, based on all sources of flooding and taking account of the latest climate change allowances. A Level 2 SFRA was then carried out as it was determined that the City Council could not allocate all land for development outside flood risk areas. The Level 2 SFRA gives more detail on the nature of the flood risks identified and where the sequential and exception tests will need to be applied. Although the Oxford Local Plan 2040 has now been withdrawn, the 2023 SFRA is based on the most up-to-date modelling available at the time, including running the associated central, higher central and upper end climate change allowances, which provided a comprehensive update to the flooding mapping for the city. The Level 1 assessment in particular therefore provides a very useful baseline (regardless of which site allocations are taken forward in the Oxford Local Plan 2045). However, any future SFRA will need to use the new flood zone data that was published by the Environment Agency in March 2025.

Taking account of Climate Change impacts when looking at Flood Risk

- 3.11 The paragraphs below summarise the approach that was taken in respect of taking account of the climate change allowances in the Local Plan 2040. The new Local Plan will have to determine if this approach is still the preferred one.

- 3.12 An important part of predicting the likely impact of flooding in the future is looking at the likely impacts of climate change. In flood risk terms, climate change is likely to bring increased wetter weather and more incidences of various types of flooding. The headline findings from the current UK Climate Projections released in 2018 (known as UKCP18) highlighted that in the most recent decade (2009-2018), the UK climate has been on average 1% wetter than 1981-2010, and 5% wetter than 1961-1990. Looking into the future, UKCP18 reported that rainfall patterns across the UK will vary, but that by 2070, under a scenario of high greenhouse gas emissions, winters will on average grow increasingly wetter and summers drier. However, despite overall summer drying trends in the future, there are likely to be future increases in the intensity of heavy summer rainfall events, particularly for urban areas in the UK, which will have an impact on the frequency and severity of surface water flooding.
- 3.13 To take climate change into account in planning for flood risk, the 2023 SFRA has been informed by the [latest guidance released by the Environment Agency](#) on how local planning authorities, developers and their agents should use climate change allowances. There are allowances for different climate scenarios over different epochs, or periods of time, over the coming century.
- 3.14 For Oxford City, the peak river flow and peak rainfall intensity allowances are relevant and have been used in any relevant modelling updates. For peak river flow, Oxford falls within two management catchment areas: Gloucestershire and the Vale Management Catchment and Cherwell and Ray Management Catchment. The [climate change allowances for the Cherwell and Ray](#) are significantly lower than those for the [Gloucestershire and the Vale](#). The majority of the Oxford administrative area lies within the Gloucestershire and Vale Management Catchment, therefore this in combination with the more precautionary climate change allowances, is why this management catchment has been deemed to be the most appropriate one to use for Oxford. More detail on how the climate change allowances have been applied to the updated hydraulic modelling can be found in the Level 1 SFRA (2023). In the emerging Oxford Local Plan 2040 (now withdrawn), we also looked at the implications of climate change on a site-specific basis as part of gaining a clear understanding about whether development proposed in higher-risk flood zones would be safe, as well as meeting the other tests set out in national policy. Climate change allowances were applied to all site allocations assessed as part of the Level 2 SFRA.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 Flood risk from a range of sources will be an ongoing challenge in the city. Climate change is projected to bring about wetter winters and more incidences of high intensity rainfall events, which is likely to increase the risks of flooding, particularly in highly urbanised parts of the city and within the flood risk zones.

- 4.2 In the absence of a new local plan, local flooding policy would still be in place until 2036, as long as the plan remained “up-to-date”. In the absence of an up-to-date local plan, development management decisions would need to be made against the national framework. As the NPPF presently contains a strong policy framework at the national level for flooding, it is unlikely that new or existing development would be adversely impacted by this change.
- 4.3 More locally, the Environment Agency is working in partnership on a major new scheme to reduce flood risk in Oxford. [The Oxford Flood Alleviation Scheme \(OFAS\) will cost around £176 million and is one of the biggest flood schemes in the country, with the aim of reducing flood risk to homes, businesses, services and major transport routes into the city.](#) The OFAS will create a new stream with wetland wildlife corridor to the west of Oxford. The intention of the scheme is to reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, as well as to the railway, Botley and Abingdon Roads, other local roads, utilities and services such as broadband. The scheme will also bring additional environmental improvements to the area, including creating new wetland which will link up existing wildlife sites. The proposed scheme is approximately 5 km long, starting just north of Botley Road and passing under the A423 Kennington Railway Bridge (Southern by-pass) to the south before re-joining the River Thames.
- 4.4 In spring 2022, the Environment Agency submitted a new planning application for the scheme to [Oxfordshire County Council, who in summer 2024, resolved to grant planning permission for the OFAS.](#) Approval is subject to the application first being referred to the Secretary of State for the Ministry of Housing, Communities and Local Government, due to the scheme’s location in the Green Belt. The Secretary of State will decide if they wish to make a determination. The Environment Agency also made a new compulsory purchase order (CPO) for the scheme. There was a public inquiry into the CPO, led by an independent inspector, which ran from 14 November 2023 to 26 January 2024. In May 2025, the [Secretary of State confirmed the CPO](#) which means the Environment Agency can progress with purchasing the land and securing the access needed to build the scheme.
- 4.5 Although a scheme like the scale of OFAS has the potential to significantly reduce flood risk to all properties in Oxford currently at risk of flooding from the River Thames, even with flood defences in place, an element of residual risk will remain in areas that are prone to flooding. Residual risk can arise from the failure of flood management infrastructure such as a breach of a raised flood defence or blockage of a surface water conveyance system.
- 4.6 In respect of sustainable drainage systems (SuDS), the absence of a local plan would not be so impactful. National policy now requires SuDS on not just major developments (over 10 dwellings), but for minor developments (fewer than 10 dwellings) within an area liable to flood from surface water or groundwater, or that are likely to increase flood risk locally, as well as for developments that need sustainable drainage solutions to be provided. The relevant policy in the current Oxford Local Plan 2036 (Policy RE4) contains a hierarchy of

SuDS approaches to apply and refers applicants to the guidance provided by either the City Council (minor development) or [County Council](#) (major development).

5. Key issues addressed through the Local Plan 2045

Introduction

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to climate change, resources and flood risk objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.
- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Impacts of Climate Change on Flood Risk

- 5.3 Addressing current and future flood risk remains a key priority for the new Local Plan. The ongoing impact of climate change includes projected wetter winters and increased incidences of intense rainfall events and this is likely to exacerbate risk of flooding in the future, with a variety of negative consequences for property, economy and ecosystems as well as human health. Although there is a need to strike a balance to ensure that other objectives such as the correct amount of housing, infrastructure etc. are also achieved, it is imperative that any new development is directed to areas with the lowest risk of flooding first, and that flood risks are well managed in new development so as to not increase flood risk elsewhere and to ensure the safety of occupants.
- 5.4 Our existing policy is performing fairly well according to feedback from specialists and the EA. Our approach to flooding also benefits from national policy providing a strong framework for addressing flooding, much of which can be applied directly to Oxford. There are however some areas where relying on national policy alone is not appropriate, as it does not take account of the local circumstances of Oxford's flood risk context, particularly in relation to extensions and also brownfield land at high risk of flooding. As the Local Plan 2036 policy has been put into use, some weaknesses and lack of clarity in how to apply the policy have also surfaced, which the Local Plan 2045 could address.

Strategic Flood Risk Assessment

- 5.5 Our current Strategic Flood Risk Assessment (SFRA) was published in 2017. In order to ensure that the SFRA is still relevant to best practice and the latest available knowledge, there is a need to undertake a new assessment to ensure that it takes account of the latest climate change predictions and modelling published at the time of the study. Climate change predictions are constantly being updated and refined and new predictions can have a notable effect on the picture of risk which we have considered as we have refined our policies (particularly our site allocations).
- 5.6 To support the Oxford Local Plan 2045 we commissioned an SFRA in order to understand the impacts of the latest modelling, including climate change predictions. The SFRA uses the EA's latest available modelling data, but also considers the detailed and area-specific 2018 model alongside this to maximise the accuracy of defining Flood Zone 3b. The SFRA assesses the risk from all sources of flooding as well as cumulative impact that development or changing land use would have on flooding. It also identifies opportunities to reduce the causes and impacts of flooding and identifies any land likely to be needed for flood risk management features and structures. The SFRA provides an evidence base to allow us to carry out a sequential test for site allocations to locate these in the lowest areas of flood risk wherever possible. It is also necessary for informing a more detailed assessment (SFRA level 2) of any allocations that need to be located in areas of higher flood risk to ensure development can happen in a safe way, historically this has been necessary in the city due to the lack of available sites that can meet our housing needs within areas of lowest flood risk.

Approach to flood zone 3b (functional flood plain)

- 5.7 The city is highly constrained by areas of flood risk, with a significant area comprising flood zone 3 – this is the area at highest risk of flooding. Flood zone 3 includes an area that is functional flood plain, referred to as flood zone 3b. National guidance is that we should not usually accept development within this area due to the high risk of flooding along with the loss of flood storage that this would incur, and our proposed approach is to continue to follow national policy and set out that development of greenfield sites within 3b would not be permitted. However, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within 3b.
- 5.8 Current policy in the Local Plan 2036 was formulated recognising that these brownfield sites can provide more sustainable locations for development than greenfield sites and that refusing further development could allow these areas to deteriorate whilst ignoring the opportunities for thoughtful redevelopment that can actually reduce flood risk in future. Many developments in these flood zones in the past have not compensated for lost flood storage or ensured suitable drainage systems, whereas new development on these same sites can make sure this does happen. The Policy in the Local Plan 2036 takes a pragmatic approach that recognises that Oxford already has significant development in areas at high risk of flooding, but that preventing redevelopment of these sites would also be preventing

opportunities to be taken for improvements to the flood risk situation, as well as sterilising sites in highly accessible locations.

- 5.9 Policy G7 in the Local Plan 2045 would broadly continue the approach of the existing plan, but would also deliver a clearer and more comprehensive approach to a range of development types including explicit reference to minor and householder development, and basement development. The policy allows some limited development within Flood Zone 3b, for water-compatible uses or essential infrastructure, as allowed for in national policy, but also on previously developed land in circumstances where the flood risk is demonstrably decreased through careful design and where all of the set of six criteria can be met, which are designed to ensure safety and improvements to flood risk management. These criteria include that the built footprint of the site is not increased and that the development does not result in an increase in flood risk vulnerability classification (so for example an office in flood zone 3b could not change to residential).
- 5.10 The approach for greenfield sites in Flood Zone 3b follows national policy, setting out that new development would not be permitted there except for water compatible uses and essential infrastructure. It is not seeking to be any more restrictive than this.

Sustainable Drainage Systems (SuDS)

- 5.11 National Policy includes some references to SuDS; however, we feel that more detail can be added in the new Local Plan, especially in regard to the design of SuDS which are specific to Oxford and have developed Policy G8 to capture this. In Oxford, a significant amount of development comes from minor planning applications, and we recognise that there is an opportunity to further help mitigate for flood risk by requiring SuDS on all new developments, including minor schemes. This would have a significant positive impact, especially considering the potential cumulative effect that numerous small developments could have on increasing overall flood risk in Oxford.
- 5.12 In addition to having SuDS on all new developments, Policy G8 is also explicit about encouraging green SuDS, that incorporate natural features, rather than grey (e.g. tanks underground). SuDS that incorporate natural green features have the benefit of bringing a wider range of additional benefits to place-making, such as making spaces for biodiversity and making spaces that are more pleasant for people. The policy therefore includes a hierarchical style approach to SuDS design, prioritising green SuDS and maximising multi-functionality. More details on this can be found in the background paper for Green Infrastructure which illustrates the benefits of multi-functionality, which although a priority, are far wider than just reducing flood risk.

6. Appendix A - Policy options and preferred approaches

The analysis set out in the previous sections of this background paper indicates that flood risk is a key issue that new development will need to consider and respond to depending on where it comes forward in the city. The process by which drainage is managed on sites is also a related consideration.

The Local Plan 2042 therefore includes proposed policies in response to the following topics:

- Addressing flood risk and requirements for flood risk assessments
- Sustainable Drainage Systems (SuDs)

For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.

Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

Table 1 - Policy options set 007a: Flood Risk and Flood Risk Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Reiterate national policy and set out requirements for when an FRA will be required, particularly where there is less certainty within national policy (e.g. extensions). Include expectations for how flood risk ought to be assessed, avoided, managed and mitigated. This will include where flood risk could be impacted off-site.	Applications for extensions are a regular occurrence across the city, including within Flood Zone 3b. Owing to the constraints within the city we are seeking to allow some householder extensions if it can be demonstrated that it will not result in a significant increase in flood risk. This option would set out greater certainty as to what is expected.	Whilst the Local Plan can set out some basic principles that should be applicable to most situations, there is likely to always be an element of site-specific context which will need to be considered and may require deviation from these principles. With more extensions permitted within Flood Zone 3b, there is a risk of cumulative impacts from increased developed footprint over time.
Option b For extensions proposed within Flood Zone 3b – set out some key principles/ requirements that will need to be met to address flood risk before these will be permitted.	This option would make explicit the City Council's expectations for when FRAs are to be submitted, and how flood risk is to be addressed in Oxford. It would ensure that where flood risk is present on a site, this is effectively assessed and then addressed in the most appropriate way through the design of the development. Despite strength of national policy regarding flood risk, it does have some weaknesses/ ambivalence towards certain	National policy is generally strong regarding when FRAs are to be expected and how they ought to be completed. Policy is also strong regarding how flood risk ought to be addressed by new development. This could result in some repetition.

	situations, for example how FRA is to be applied to extensions, and local policy can provide greater certainty regarding our expectations.	
Option c Prevent self-contained basement flats in areas at risk from fluvial flooding.	There is a higher level of risk to life in self-contained basement flats than in basement accommodation more widely when in areas of flood risk. This policy approach would make self-contained basement flats unacceptable in such an area.	Could reduce opportunities for development of sites which are otherwise in accordance with national policy and where risks could be largely addressed through specific mitigation measures. Such development is already prevented by national guidance in Flood Zone 3 and subject to an exemption test in Flood Zone 2, so a specific option would not be considered necessary.
Option d Prevent culverting of open watercourses.	Culverting of open watercourses can introduce additional flood risk in the local area due to potentially throttling water flows during heavy rainfall events as well as risks of blockages during storm events that can exacerbate flooding. It can also have detrimental effects for the quality of the watercourse, removing habitat and harming local species.	Could reduce opportunities for development of sites if the open watercourse cannot be incorporated into the scheme.
Option e Allow only water compatible uses and essential infrastructure in undeveloped Flood Zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within Flood Zone 3b, with high standard of	Allowing only water-compatible and essential infrastructure in undeveloped flood zone should not increase flood risk elsewhere or result in unnecessary net loss of functional floodplain.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of

mitigation, where built footprint of a site is not increased and where risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposals would conflict with safe access and egress requirements, they would be refused.	In Oxford there is much existing (and historic) development in areas of flood risk; it is important that those existing properties can be improved/ reused/ redeveloped to make efficient use of land. This approach would provide for careful regeneration of existing development sites but limiting further changes in built footprint should help to ensure no increase in flood risk elsewhere (with potential for improvement). Also, encourages use of brownfield land over developing on greenfield sites and can allow development close to where people already live.	water; create or increase any risks for occupants, or of flooding elsewhere. The policy would need to provide clarity on what constitutes the built footprint of a site and what conditions are acceptable under the policy – e.g. if the footprint remains the same, is it acceptable to be relocated within a site?
Option f Allow only water compatible uses and essential infrastructure in undeveloped Flood Zone 3b. However, allow limited development (e.g. redevelopment of existing structures) on brownfield within Flood Zone 3b, no restriction on built footprint change if risk is demonstrably decreased. Apply sequential test for development in other flood zones in accordance with national policy. In any circumstance where proposals would conflict with safe access and egress requirements, they would be refused.	Greenfield sites are likely to have a role as flood storage, and this option would preserve this function and help to ensure no increased flood risk elsewhere. Exemptions could be possible for specific allocated sites where the required evidence has been gathered at the Local Plan stage to support this.	This policy could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not shift flood risk elsewhere, and is in accordance with the NPPF.

Option g Prevent development of greenfield sites within Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).	Same positives as above for option b, except this option allows for a greater use (e.g. densification) of site compared with option a - as long as design of development ensures flood risk is ultimately reduced compared to pre-development.	Where development is proposed on brownfield sites in Flood Zone 3b, it will be essential for proposals to have appropriately assessed risks and be able to demonstrate that new development would not: reduce the water storage capacity of the floodplain; impede flows of water; create or increase any risks for occupants, or of flooding elsewhere. A demonstrable reduction in flood risk alongside an increase in built footprint could be very difficult to achieve in practice.
Option h Do not include a policy about flood risk but rely on national policy instead.	Simply relying on national policy could be easier for developers to understand and work with. National policy on flood risk is fairly developed and well tested and may ultimately be transferred into National DM policies.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Option a, or Option a+ combination of all or some of Option b, Option c and Option d, with either Option e or Option f or Option g. Option h is an alternative option to Option a.

High-level screening conclusion? The options are similar to each other from a sustainability perspective. National policy already provides a strong framework for managing flood risk, however the additional options proposed on top of national policy are seen as necessary due to local context.

Screened in for detailed appraisal? No

Rationale:

Options a and h are alternative options. Option a reiterates national policy and provides more detail where there is less certainty within national policy such as for extensions, whereas Option h does not have a policy and just defaults to national policy. Options b, c and d are all additional options which seek to set out key principles to consider for extensions in Flood Zone 3b; to prevent self-contained basement flats in areas at risk from fluvial flooding; and to prevent culverting of open watercourses respectively. Option e would allow limited development on brownfield land within Flood Zone 3b, where the built footprint of the site is not increased and where flood risk is demonstrably decreased and where safe access and egress requirements are mandatory. Option f is similar to Option e, except it would not restrict the size of the built footprint of the development. Option g goes further than either Options e or f as it prevents development of greenfield sites in Flood Zone 3a, but with specific exemptions (e.g. for allocated sites).

In terms of sustainability impacts, **criterion 2. Climate resilience** is the most relevant. Most of the options would score positively against this criterion as they seek to manage flood risk, albeit in different ways, for example, whether it's addressing extensions in Flood Zone 3b (Option b) or preventing culverting of watercourses (Option d), or providing more detail than what is contained in national policy (Option a). The extent of the positive impact of these options will be dependent on the implementation. The only option that would score neutral is Option h as it would propose no policy and defers to national policy. Some of the policy options would impact **Criterion 3. Efficient use of land**. Options e or f would have a minor positive impact as they both seek to allow limited development on brownfield land within Flood Zone 3b, which minimises the use of greenfield land. Depending on implementation, Option g would score neutral against this criterion, as although it wouldn't allow development on greenfield Flood Zone 3a, this more restrictive option might limit sites that could be allocated for development, where land is already constrained. Option d might even score positively against **Criterion 10. Biodiversity** as not allowing watercourses to be culverted, not only reduces flood risk (water storage) but keeps the water naturalised, potentially allowing preferable conditions for biodiversity to flourish. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Flood Risk and Flood Risk Assessments - Policy G7

For the Local Plan 2045, the preferred approach is a combination of **Options A, B, C, D and E**. This will allow for a targeted policy that responds to various considerations and potential risks arising from the local context of flood risk in the city.

Option A helps to ensure national flood risk requirements are met but also provides more certainty around expectations for FRAs where national guidance is less clear, or where there are particular local issues that applicants need to consider. **Option B** would help to ensure that extensions in particular flood risk zones are informed by FRAs that meet particular requirements. **Option C** would prevent self-contained basement accommodation in areas of flood risk because of the particular vulnerabilities associated with this type of development and the risks for occupants. Meanwhile, **Option D** would prevent culverting which can incur additional flood risk due to constraining water flows during heavy rainfall events, but also have negative impacts for ecology and wildlife that rely on the watercourses.

Option E is considered to be an important response to Oxford's particular circumstances in relation to pre-existing development in flood risk areas. The option allows only water-compatible and essential infrastructure in the undeveloped flood zone, which should mean flood risk is not increased elsewhere or that loss of functional floodplain does not occur unnecessarily. However, the option also recognises that there is sometimes historic development located in areas of flood risk that could benefit from sensitive redevelopment in order to secure more sustainable futures for these sites, whilst also taking opportunities to address existing flood risk there. However, it will be important to ensure that strict requirements are set out in the policy for when this may be acceptable.

Policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDs)

Table 2 - Policy options set 007b: Sustainable Drainage Systems (SuDs)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require SuDS on all new developments (including minors), unless this is shown not to be feasible, and include guidance on how they should be implemented.	Greener solutions have multiple benefits – so these can be maximised where green SuDs are prioritised for in the first instance.	Some sites may not be able to accommodate green solutions. Whilst well-designed SuDS can deliver multiple benefits, this should not come at

Incorporate hierarchy style approach to SuDS design, prioritising green SuDS and maximising multi- functionality.	Same benefits as Option b but with more detailed specifications on the type of SuDS to be implemented, with a priority given to green, natural features. Green, multi-functional SuDS can contribute to wider placemaking and have a variety of benefits that extend beyond water management, including improving water quality, reducing urban heat, promoting biodiversity and better placemaking.	the cost of their role as flood risk mitigation where this is required – potentially this could be complicated by seeking to deliver wider multi-functionality particularly where inappropriately designed. Additional management/ maintenance requirements for green SuDS would need to be factored into design and cost of schemes.
Option b Require SuDS on all new developments (including minor household applications), unless this is shown not to be feasible, and include guidance on how they should be implemented.	Some sites might only be able to accommodate limited ‘grey’ drainage measures (e.g. tanks). This approach would ensure that new development include SuDS wherever possible and set out guidance for how this ought to be designed. SuDS can help to reduce risks of flooding, particularly during times of intense, heavy rainfall by capturing surface water run-off and reducing pressures on sewers. Sets out that SuDS would be required on minor schemes also (which are not addressed in national policy).	Could lead to proliferation of ‘grey’ SUDs and miss out on benefits that greener solutions for SuDS design – e.g. making use of green infrastructure – can provide. SuDS may be more challenging to deliver on smaller sites where space is limited. Would need to ensure that proposals are accompanied by appropriate infiltration studies.

Option c Do not include a policy about SuDS but rely on national policy instead.	There is a variety of industry guidance about good design for SuDS which could be utilised by developers. Equally the City Council could set out its expectations in the form of supporting guidance/ technical advice note.	Guidance in national policy about SuDS is limited in terms of 'good design' and regarding wider objectives (e.g. water quality), it also only addresses SuDS on major schemes. A local policy could be more explicit in terms of what is expected/ suitable for Oxford, including on minor applications. This option would arguably not address the local context of flood risk in the city and the need for all new development to address it.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Option a, b or c are alternative to each other

High-level screening conclusion? The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

Options a, b and c are all alternatives. Option a requires SuDS on all new developments (including minors), prioritising green SuDS and maximising multifunctionality. Option b is similar to Option a except it doesn't prioritise green SuDS or multifunctionality, whilst Option c is not to have a policy and rely on national policy/ guidance instead.

In terms of SA impacts the options are most directly relevant to **criterion 2. Climate resilience** and both Options a and b would be a positive impact. Option a will also have minor positive impacts for **criterion 7. Green Infrastructure**. Potentially option b might also positively impact criterion 7 as well but it depends upon implementation, otherwise it would be neutral. Option c is expected to be neutral in impact for these criteria, as there is strengthened national policy guidance however this is lacking the detail that would help to steer the design of these measures to take account of local context. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Sustainable Drainage Systems (SuDs) - Policy G8

For the Local Plan 2045, the preferred approach is **Option A**, which would mean requiring SuDS on new development and also incorporating a hierarchy style SuDS policy that steers applicants towards prioritising green SuDS measures first, before other 'grey' solutions are selected. This approach would help to ensure that surface drainage is managed appropriately, reducing strain on sewer systems and helping to build in flood resilience into sites.

This approach would also help to ensure multi-functional benefits can be derived from SuDS design by seeking to maximise green infrastructure features that can manage drainage whilst also providing other benefits for people and the environment. It would also complement the greening aspirations of other elements of the Local Plan. An approach of having no local policy, or not prioritising green features could risk missing opportunities for multi-functional features and applicants selecting less optimal drainage solutions for their sites.

Background paper 008

Carbon reduction and climate resilient design

This paper addresses carbon reduction in new development and how the Local Plan will support the city's transition to net zero carbon. The paper also addresses climate resilient design and adapting the built environment to the changing climate of the future.
Relevant Local Plan Objective(s): • Ensure Oxford is ready for a net zero carbon future. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040. 2. To build resilience to climate change, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
SEA theme(s): Climatic Factors, Air

1. Introduction	1
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	2
National and international context	2
Regional and local context	4
Other relevant plans/programmes/strategies	5
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	6
Primary sources of greenhouse gas emissions in the city	6
Carbon emissions associated with buildings in operation	8
Embodied carbon emissions during construction	8
Energy supply and grid capacity	10
Fuel poverty	11
Climate change risk and the need for adaptation	12
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	13
5. Key issues addressed through the Local Plan	14
Introduction	15

Ensuring new development is net zero carbon in operation	15
Addressing energy efficiency and setting energy use targets	16
Requirements for renewable energy generation on new development	17
Additional considerations which have informed the approach to net zero carbon	17
Energy offsetting mechanism	18
Addressing embodied carbon in the construction process	19
Supporting the retrofit of existing buildings	20
Ensuring new development is resilient to climate change	21
Appendix A – Policy options and preferred approaches	22
Policy options set 008a (draft policy R1): Net zero carbon buildings in operation	23
Policy options set 008b (draft policy R2): Embodied Carbon	29
Policy options set 008c (draft policy R3): Retrofitting existing buildings including heritage assets	33
Policy options set 008d (draft policy G9): Resilient design and construction	38

1. Introduction

- 1.1 The Council has a legal duty, as set out in Section 19(1A) of the Planning and Compulsory Purchase Act 2004, to ensure that the new Local Plan includes policies that, taken as a whole, have been designed to secure action on climate change. This is reflected in national policy, which sets out that the planning system should help to: 'shape places in ways that contribute to radical reductions in greenhouse gas emissions', and that Local Plans should take a proactive approach to mitigating climate change. In recognition of the need to take action on climate change, the Council [declared a climate emergency](#) in 2019 and has committed to achieving net zero carbon emissions as a city by 2040.
- 1.2 Alongside the transport network, the built environment is a primary contributor to Oxford's carbon dioxide emissions, a potent greenhouse gas which is causing global climate change. The power used to heat and operate buildings, as well as the resources used within the construction process, all have a role in these emissions. In order to meet national and local commitments on mitigating climate change, it is essential that new development being built in the city is designed for a net zero carbon future, and that existing development is retrofitted to reduce its carbon footprint. It is also important that new development is designed to be resilient to the impacts of the changing climate – e.g. flood risk and overheating – which could be more common in future.
- 1.3 This background paper firstly sets out key context in the form of existing policy analysis, current situation in the city and the likely situation without a new Local Plan. It then goes on to discuss the key topics and options for policies that will need to be considered in the preparation of the Local Plan 2042.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National and international context

Climate Change Act 2008

- 2.1 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as in response to the Paris Agreement, most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels).
- 2.2 Under the Act, the government is required to set five-year caps on emissions (known as carbon budgets) twelve years in advance and publish its proposals and policies for meeting these budgets. Most recently, the sixth carbon budget enshrined a target of 78% reduction in carbon emissions for the period from 2033 to 2037, whilst the seventh carbon budget is expected to be set in 2025.

Planning and Compulsory Purchase Act 2004

- 2.3 Sets out the current structure for the English Local Planning framework and includes, within section 19 (as amended by the Planning Act 2008), the legal duty to ensure that, taken as a whole, planning policies contribute to climate change mitigation and adaptation.

Planning and Energy Act 2008

- 2.4 The Planning and Energy Act (2008) makes provision within Section 1 for a local planning authority to include policies within its development plan that require development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations, provided these policies are reasonable, not inconsistent with national policies, and compliant with usual provisions around plan making as set out in section 19 of the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework (NPPF)

- 2.5 Chapter 14 of the NPPF sets out the government's requirements for how the planning system should address the challenge of climate change, particularly paragraphs 161 to 169. For the first time, the updated wording in para 161 that opens the chapter now explicitly references the transition to net zero by 2050, stating that: The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It goes on to flag the need for shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, and conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 2.6 Para 162 sets out that plans should take a proactive approach to mitigating and adapting to climate change, footnote 53 clarifies that this should be in line with the objectives and provisions of the Climate Change Act 2008, which legislates for net zero carbon emissions by 2050. Para 164 (b) discusses the need for planning development in ways that help reduce greenhouse gas emissions, such as through its location, orientation and design.
- 2.7 Paras 165 flags the importance of securing energy from renewable sources and the role of plans in helping to enable this. In particular, it sets out the need for providing a positive strategy for energy from these sources; considering identifying suitable areas for renewable and low carbon energy and supporting infrastructure; and identifying opportunities for development to draw energy from such sources. Para 167 also highlights that significant weight should be given to the need to support energy efficiency and low carbon heating improvements to existing buildings.

National Planning Practice Guidance (PPG) including National Design Guide/Model Design Code

- 2.8 National guidance supporting planning policy is set out on the Planning Practice Guidance [climate change webpage](#), although much of this now dates back to 2019 or earlier (with some sections dating to 2015). Whilst some of the guidance, including key legislation planners should take into account and general advice on climate change mitigation measures that could be applied through planning process are still of relevance, other sections appear to have been overtaken by recent policy developments (such as guidance around the 2015 Ministerial Statement as discussed below).
- 2.9 The National Design Guide (2019) which now forms part of the PPG includes guidance on what government considers to be ‘good design’ and breaks design down into 10 key topics. There is a section on “Resources” which sets out that “well-designed places and buildings follow the energy hierarchy” as well as containing some other general design guidance which can help local authorities with preparing more locally specific design guidelines.

Written Ministerial Statements on Plan Making (2015 and 2023)

- 2.10 There are two WMSs that have been published since the above legislation which have some relevance to the topic of energy and carbon, but also serve to confuse policy and local authorities’ powers.
- The first, published in 2015, set out the expectation that local authorities should not set energy efficiency standards with requirements above the equivalent to level 4 within the withdrawn Code for Sustainable Homes. It should be noted that an update to Building Regulations during that same year meant that they had already superseded the old Code for Sustainable Homes standard.
 - The more recent WMS, published in December 2023, indicates that Local Authorities cannot set their own targets based on actual energy use in buildings and dissuades them from going beyond national standards. It sets out that “*Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale...*” Where policies are proposed that do go beyond national standards, the WMS sets out that these should be supported by viability evidence that shows development would remain viable, with a focus on housing affordability and supply. It also states that such policies should be expressed as a percentage uplift of a dwelling’s Target Emission Rate (TER) calculated using the Standard Assessment Procedure (SAP) of Building Regulations.

Regional and local context

Oxford’s climate emergency declaration and the Zero Carbon Oxfordshire Partnership (ZCOP)

- 2.11 In January 2019, Oxford City Council members unanimously declared a climate emergency and agreed to create a citizens assembly in Oxford to help consider new carbon targets and additional measures to reduce emissions. This was followed in February 2021, by signing the Zero Carbon Oxford Charter, and the creation of a new Zero Carbon Oxford Partnership (ZCOP) for the city along with the setting of a local target of achieving net zero carbon emissions as a city by 2040 (ten years ahead of the UK net zero carbon target). The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.
- 2.12 The ZCOP has previously developed a [Roadmap and Action Plan](#) (published 2021) for the city which identifies the primary sources of carbon emissions in city at present and the key milestones that are needed in relation to decarbonising different aspects of life in Oxford in order to meet the net zero target of 2040. The roadmap highlights the large-scale changes and the challenging nature of the transition to full decarbonisation which is needed across various sectors, such as expansive retro-fit of existing buildings to decarbonise heating and increase fabric efficiencies, large amount of micro-renewable installation on rooftops to increase clean energy generation as well as ongoing increases in EV charging infrastructure to support decarbonisation of transport.

Oxford Local Plan 2036

- 2.13 Policy RE1: Sustainable design and construction sets out the Council's expectations regarding carbon emissions in new development. The policy requires new development to achieve reductions in carbon emitted beyond those set out in national Building Regulations. The targets are increased at intervals throughout the plan period, beginning at 40% reduction, before moving to 50% by 31 March 2026, and then zero carbon after 2030 (for residential development).
- 2.14 Other policies in the adopted Local Plan that have a role in contributing to reductions in carbon emissions in the city, include:
- Policies that encourage and enable sustainable/active travel and the transition to electric vehicles (policies M1 to M5),
 - Policies relating to protecting and enhancing Oxford's green and blue infrastructure network (policies G1 to G8).

Other relevant plans/programmes/strategies

Future Homes/Buildings Standard – Building Regulations reforms

- 2.15 Outside of the planning system, a review of national Building Regulations has also been ongoing with staged plans to implement the Future Homes Standard (dealing with residential development) and Future Buildings Standards (non-residential development). These reforms to the technical requirements within Building Regulations are intended to deliver higher standards of energy efficiency and carbon reduction across all new buildings through Building Control process. The first stage of these reforms came into

effect in 2022 and was presented as an interim uplift to Building Regulations that would result in homes producing 31% less CO2 emissions compared to current standards. It also included updates to other technical standards such as on ventilation, the performance gap, overheating and EV charging.

- 2.16 Further changes, expected in 2025, will result in new homes producing at least 75% lower CO2 emissions than those built to previous Building Regulations standards, as well as being 'zero carbon ready'. This means that, even if the new buildings are still emitting some emissions, these should reduce to zero over time (e.g. with the continued decarbonising of the energy supply sourced from the national grid as fossil fuels are phased out of the system). The reforms only affect the performance standards of buildings that are addressed by Building Control (e.g. regulated energy systems), meaning the current proposals would not deliver full net zero development, nor address embodied carbon/energy.

Oxfordshire Climate Vulnerability Assessment (2024)

- 2.17 The County Council have produced a climate risk vulnerability assessment for the county which identifies how climate change could impact various sectors within Oxfordshire. The assessment identifies the city as being an area with increased climate risk to hazards such as overheating and flooding, both now and in the future.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Primary sources of greenhouse gas emissions in the city

- 3.1 Analysis of the greenhouse gas emissions that are generated across the city is challenging with varying estimates depending upon the methodology and data sources used. The Department for Energy Security and Net Zero (formerly BEIS) publish [statistics](#) on per capita emissions yearly and these show an overall trend of reducing per capita emissions for Oxford since 2005, as can be seen in Figure 3.1.

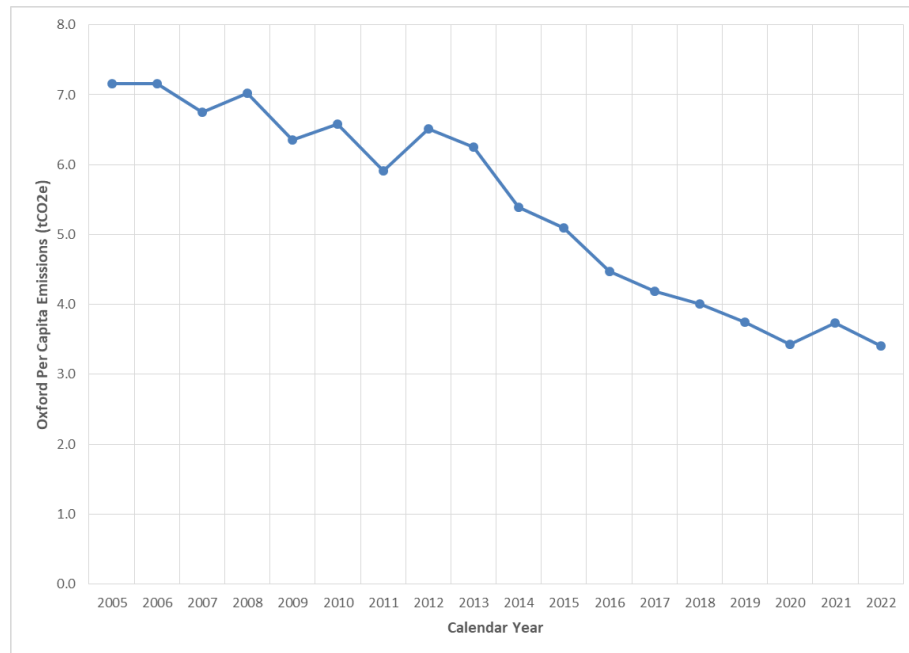


Figure 3.1 - Per capita emissions of carbon dioxide (tCO₂ equivalent) for Oxford according to Local Authority Greenhouse Gas Emissions statistics (2005-2022) Sourced from the [Department for Energy Security and Net Zero statistical release](#) (June, 2024)

- 3.2 The underlying summary accompanying the statistics above highlights that the national pattern in declining emissions, which the city's own performance tracks with, has largely been due to reductions in emissions from power stations and industrial combustion. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a large reduction in the amount of coal, which is a carbon intensive fuel, and increasing use of renewables. A small increase in emissions was noted in 2021 for the majority of Local Authorities, including Oxford, due to COVID-19 restrictions easing and colder temperatures in that year increasing the use of heating in buildings. For the most recent statistical release (2022), per capita emissions for the city had decreased in line with much of the rest of the country. The national decrease in emissions associated with 2022 was attributed largely to milder weather reducing heating demands and potentially the impact of higher energy prices.
- 3.3 The Zero Carbon Oxford Partnership's [Roadmap and Action Plan](#) (2021) identified the key sources of emissions in Oxford as part of its work in defining a roadmap to net zero by 2040. This was an assessment of all greenhouse gas emissions across the city (not just carbon, as is highlighted in the government data above) and drew upon data from both BEIS and from the SCATTER cities tool as well as local sources, to produce a sector-by-sector breakdown of emissions in the city. Whilst the baseline data informing the analysis is now a few years old (2018 was the baseline year), the sector-by-sector profile as shown in Figure 3.2 clearly highlights the major impact of the built environment on emissions, with buildings being the primary source of emissions resulting from the city, and this is not

considered likely to have changed in the intervening period. Transport was the second largest contributor though this is a much smaller proportion of emissions as a whole.

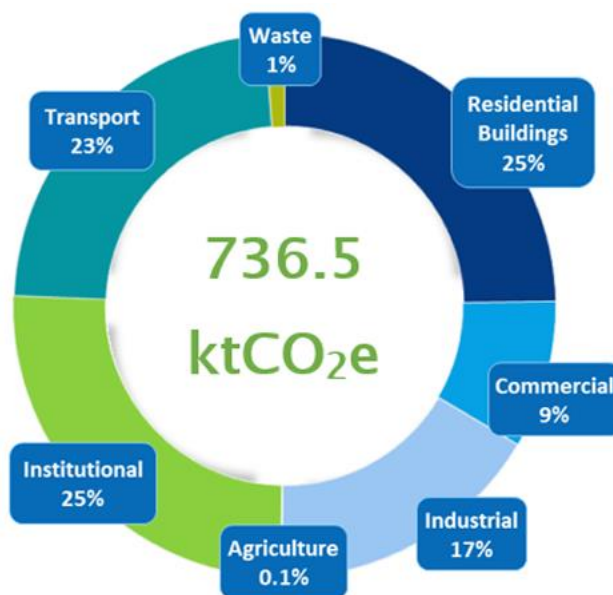


Figure 3.2 - Sector-by-sector greenhouse gas emissions in Oxford (2018 baseline year as used in the Zero Carbon Oxford Partnership Action Plan)

Carbon emissions associated with buildings in operation

- 3.4 As the ZCOP work notes, the primary reason for the major contribution buildings are making to Oxford's carbon footprint is the use of fossil fuels for heating. However, other sources within buildings include gas used for cooking, as well as emissions associated with electricity use (where this is not sourced from renewables). The majority of the emissions associated with buildings are from buildings that are already in existence. This flags a significant need for retro-fitting to happen alongside ensuring that new development does not exacerbate the problem.
- 3.5 The Building Regulations reforms embodied through the Future Homes and Future Buildings Standards (as discussed in section 2) should help to ensure new buildings make a much smaller contribution to this existing carbon footprint. Until grid energy is decarbonised, however, where these buildings rely on power from the national grid for their operation then there will still be some associated emissions from them without applying further standards via local policy.

Embodied carbon emissions during construction

- 3.6 The carbon associated with buildings in operation is not the only source of emissions that need to be addressed as the city moves towards net zero carbon by 2040. There is an embodied carbon cost of the materials used in the built environment in the construction,

maintenance, redevelopment and demolition processes. Carbon dioxide can be emitted in various ways as part of the processes but equally, carbon can be sequestered through careful design choices (e.g. use of natural materials like wood). As operational energy becomes zero carbon, the embodied carbon cost of new development will become the primary source of emissions that needs to be addressed and this will be a growing area of focus in future years.

- 3.7 Addressing the issue of embodied carbon is closely tied with the concept of a circular economy (Figure 3.3). The Low Energy Transformation Initiative (LETI), in its [Embodied Carbon Primer](#), define the circular economy as a system that is ‘restorative or regenerative by intention and design’. In this regard, products, buildings and systems are designed in a way that considers not only how these can be repaired and reused easily, but also how the energy and materials used to construct them can be remanufactured and recycled at the end of their life. This approach enables reductions in the raw materials we extract from the environment over time, our energy demands and the impacts we have upon the wider environment, and by extension, carbon emissions associated with the construction process.

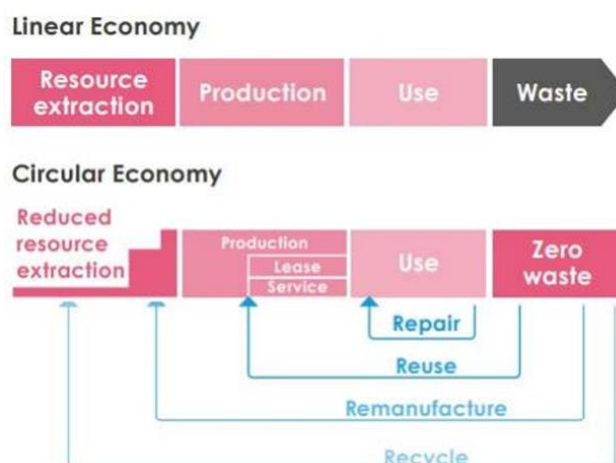


Figure 3.3 - The stages of a linear economy versus a circular economy (source: [LETI Embodied Carbon Primer](#))

- 3.8 But embodied carbon is an even more challenging and complex aspect of net zero carbon design to address than operational carbon. There is much ongoing research and emerging guidance with varying levels of understanding at present in relation to the different stages of a building's life cycle. As UKGBC [note](#), most of these embodied emissions occur early during the construction stage and this is typically the focus at present. Perhaps reflecting the emerging nature of this topic, it is not currently addressed through a consistent set of national standards, though this is something that has been repeatedly called for through an amendment to Building Regulations as highlighted in this recent [House of Commons Committee report](#).
- 3.9 The emerging nature of our understanding of the topic and how to effectively address it makes formulating policy challenging, particularly because there are many difficult

questions that the development management process must grapple with when considering embodied carbon and how it is balanced with other place-making objectives, and there are not always definitive answers. For example:

- Is it more sustainable to retain an energy inefficient building or demolish to provide a highly energy efficient replacement?
- How should we balance out the benefits of long-life materials that may have a high carbon cost to produce, as opposed to shorter lived materials which will need replacement more quickly but have a low carbon cost to produce?
- How do we balance out issues of carbon reduction alongside other important choices in delivering high-quality design that contributes to making the places we wish to see in Oxford?

Energy supply and grid capacity

- 3.10 Across the UK, there are national trends in new sustainable technologies which are of increasing popularity and that also form important context to the new Local Plan policies. The uptake in electric vehicles has been growing, leading to increased demand for EV charging infrastructure. Equally, we are seeing increasing uptake in electric solutions for heating our properties instead of fossil fuel burning boilers, such as Air Source Heat Pumps. The uptake in these technologies is likely to continue and most likely speed up and will result in increasing demands for electricity and increased pressure on the national and local energy grid infrastructure.
- 3.11 The [Oxfordshire Energy Strategy \(2018\) and associated delivery plan \(2019\)](#), supported by the Stage 1 work of the [Oxfordshire Infrastructure Strategy \(OXIS\)](#) commissioned by the Oxfordshire local authorities, previously identified that the electricity grid across the county is already constrained. The OXIS work concluded that annual electricity consumption across the county to 2040 is expected to increase due to three reasons: continued increase in the number of domestic and non-domestic buildings; the transition to electric vehicles; and the decarbonisation of heat. These factors will not only increase annual consumption but will also increase peak demand and will necessitate ongoing work by the Distribution Network Operators to meet future demands through upgrades and reinforcing of the grid so that constraints can be reduced and additional generation capacity (e.g. solar PV) incorporated. Whilst this work is some years old now, the high-level messages about future needs are unlikely to have changed, though there is emerging work such as Local Area Energy Planning across the County and an updated OXIS emerging which may update this picture in due course.
- 3.12 Looking beyond Oxford, the current Government has recently published an action plan for meeting a target of securing a clean power grid by 2030 (in advance of the previous 2035 commitment) as it seeks to ensure that the majority of the country's energy demand is generated by clean, renewable sources, backed up with gas only during generation shortfalls. National decarbonisation actions to date have already supported reducing per capita emissions in the city, which is likely to continue, however, it seems reasonable to hold a 2030 or 2035 net zero target with some caution. Recent assessments have

highlighted that the pace and lack of investment to date has put targets for decarbonisation of grid in doubt, for example, the Climate Change Committee [flagged](#) multiple uncertainties based on lack of strategy and direction for rollout of renewable energy generation. In their most recent [2024 report to parliament](#), they continue to note that pace of delivery in rollout of renewable energy capacity needs to increase radically if net zero targets are to be achieved. A new 2030 clean power target suggests this required increase in pace is even more pressing.

Fuel poverty

- 3.13 The [Oxfordshire Joint Strategic Needs Assessment](#) (JSNA) defines a household as being in fuel poverty if:
- they have a fuel poverty energy efficiency rating (FPEER) of band D or below; and
 - if they are to spend their modelled energy costs, they would be left with a residual income below the official poverty line.
- 3.14 Three factors therefore affect fuel poverty: household income, fuel prices and household energy consumption. Buildings that demand a lot of energy to heat and run, combined with high energy prices (e.g. as has been seen subsequent to global instability in face of crisis like war in Ukraine and covid recovery), and pressures on household incomes can serve individually and cumulatively to exacerbate fuel poverty.
- 3.15 The Oxfordshire JSNA identifies that Oxford City is significantly worse than the Oxfordshire or regional averages on fuel poverty, whilst the other Oxfordshire districts are each significantly better than average (Figure 4). The 2024 update, which reports on 2021 and 2022, indicates that fuel poverty worsened across the county including in Oxford with its score increasing from 10% to 11.2% (+1.2%). The picture of fuel poverty within the city is unequal; there are twelve areas in the city with more than 10% of their households in fuel poverty, with the highest proportion (East Central Oxford) and lowest in (North Central Oxford) (Figure 3.4).

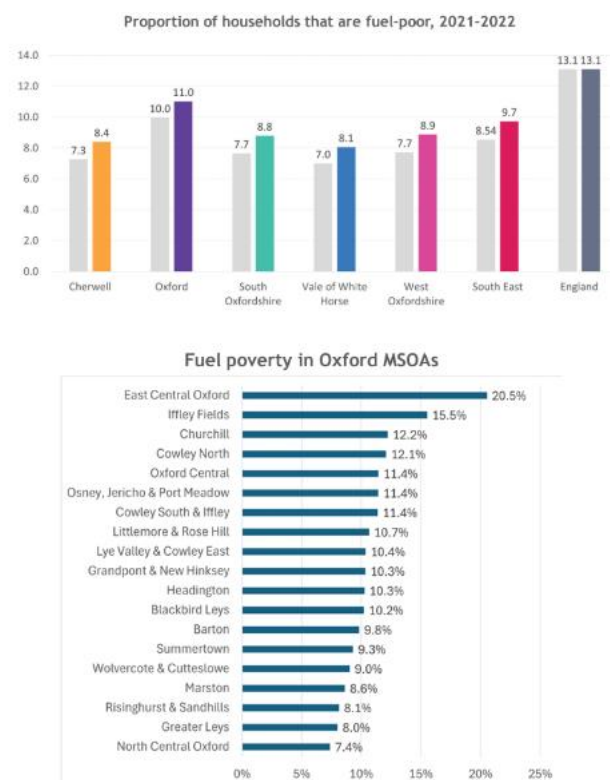


Figure 3.4 - Percentage of households in fuel poverty across Oxfordshire in 2021 and 2022 (top) alongside a breakdown of fuel poverty across different parts of Oxford in 2022 (bottom) (source: [Joint Strategic Needs Assessment](#) 2024)

Climate change risk and the need for adaptation

- 3.16 The impacts of greenhouse gas emissions such as carbon dioxide are in exacerbating the global problem of climate change, however, even if emissions were to be cut to zero today, the climate would continue to change because emissions in the atmosphere will persist for some time. The risks from climate change such as milder, wetter winters; coupled with increasing periods of intense and prolonged rainfall; as well as hotter, drier summers, will impact everyone in Oxford, but could be especially pronounced for more deprived communities and those living in poor health (as is discussed further in the health and wellbeing background paper).
- 3.17 Oxford has various characteristics that lead to climate change risks. A significant amount of land is exposed to flood risk from the two rivers, and other water courses running through the city. Despite areas of abundant green space, other areas are intensely urbanised and lacking in any green features, reflecting the constrained nature of parts of the city which brings additional challenges. For example, water runs off these artificial surfaces easier and there is less storage available in the form of green features and soils which can exacerbate flood risk (e.g. surface water flooding or overwhelming drainage systems). Also, the lack of green features exposes the city to additional overheating risk and the urban heat island effect as artificial surfaces absorb and reradiate heat, shading is reduced and the natural cooling effects of vegetation are reduced.

- 3.18 Recent research by the Oxfordshire County Council as part of their County-wide [Climate Vulnerability Assessment 2024](#) identifies Oxford as having some of the most at risk areas in the county for future climate change in respect of flooding and heat waves. The assessment highlights that confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymeade, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas.
- 3.19 The picture is similar for flooding, with the county work identifying a number of wards in the city as being in the top ten with highest flooding risk at present (Blackbird Leys, Holywell, Hinksey Park, Littlemore, Marston and Northfield Brook). The subject of current and future flood risk is explored further in the Flood risk background paper and will be an important factor in the updated Strategic Flood Risk Assessment.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 In the absence of a new local plan, the existing Oxford Local Plan 2036 policies would continue to apply. Policy RE1: Sustainable design and construction, sets out the carbon reduction requirements that proposals for new-build residential developments and new-build non-residential developments of 1000m² or more need to demonstrate through submission of an energy statement. At time of writing, this requirement is a 40% reduction over the current Building Regulations baseline.
- 4.2 However, Policy RE1's requirements are not fixed over time, instead, they step up and require an increase in carbon reductions against the current Building Regulations baseline in 2026 and 2030 for residential developments, and 2026 for non-residential developments. The policy ultimately requires Zero Carbon homes from 2030, although this requirement does not apply to new build non-residential developments and as such the requirement for those types of development the expectation would remain at a 50% reduction from 2026 onwards.
- 4.3 Policy RE1 applies only to regulated carbon emissions, excluding those unregulated emissions from any policy requirements. Meanwhile, the policy is also very limited in setting requirements in relation to actions that can reduce embodied carbon emissions within the construction process. Additionally, the Local Plan has minimal control over existing buildings and cannot force through owners to undertake retro-fit works, which will leave the existing retro-fit challenge to be addressed in other ways.

- 4.4 Beyond the plan period (past 2036), in the absence of a new local plan, the policies for planning in national planning policy as set out in the NPPF would take on increasing prominence. Whilst recent updates to the NPPF highlight the role of planning in supporting transition to net zero carbon, there is no specific requirement for net zero carbon development despite the national legislated target of being a net zero carbon country by 2050.
- 4.5 Of course, if the proposals are progressed as previously consulted on, then national standards set through Buildings Regulations are expected to become tighter in future with the introduction of the full Future Homes and Future Buildings Standards. This will support further reductions in some emissions associated with new development. As touched upon earlier in this paper, these proposed updates however do not currently address the full operational energy demands of buildings, ignoring unregulated energy loads not controlled through Building Regulations and associated with up to 50% of energy demand in a new building. They also do not address embodied carbon/energy. As these elements are also not touched by Local Plan 2036, the emissions associated with them would remain unaddressed without a new Local Plan.
- 4.6 Nationally, we are likely to see continued drop in emissions related to grid electricity used in development in line with the government's [clean power target of 2030](#), which is ahead of previous 2035 net zero grid commitments. However, the national scale rollout of renewable energy generating technology needed to support a net zero grid has, to date, suffered from lack of strategy and investment at the required pace to achieve such targets.
- 4.7 In the short term at least, without additional mitigation measures in place to address emissions from new development via a new Local Plan, then any additional growth can be expected to result in an increase in emissions.
- 4.8 In relation to climate change risk. The impacts of climate change are likely to continue to be felt, even with radical reductions in greenhouse gas emissions, but could become more severe if trends in emissions do not reduce. The Oxfordshire Climate Vulnerability Assessment 2024 indicates that six of the city's wards which were discussed in the last section remain in the top ten at risk from overheating for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county) and five remain in the top ten for flooding (Holywell and Hinksey Park are replaced by other wards in the county).

5. Key issues addressed through the Local Plan

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to carbon reduction and achieving net zero carbon objectives. Under each of these topics, there were various options for policy

approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Ensuring new development is net zero carbon in operation

5.3 The Local Plan's influence over carbon reduction is primarily about making sure new development does not add to the challenge of decarbonisation in the city, either by emitting additional emissions or by introducing costly retrofitting burdens for future occupiers. In the absence of net zero carbon standards in national policy, including current or future Building Regulations, this means that the new Local Plan needs to ensure that new development is net zero carbon.

5.4 At its simplest, net zero carbon design essentially means ensuring that new buildings do not contribute net additional emissions into the atmosphere whilst in use. Most directly, emissions from buildings comes from the burning of fossil fuels for heating (e.g. within boilers), as well as for cooking. Indirectly, emissions are also associated with fossil fuels used to power the energy grid. A growing consensus has developed around several metrics which relate to energy use in net zero carbon buildings in operation which have guided the formulation of policy R1:

- **A maximum energy allowance for total Energy Use Intensity (EUI)** – Encouraging energy efficient design by limiting the overall annual energy use needed to operate the building. Also important for addressing challenge of rising energy costs and fuel poverty by reducing energy costs for occupants. Targets for total EUI vary depending on type of development.
- **A maximum energy allowance for space heating** – having a specific limit on energy used for heating - driving a focus on thermal efficiency (in line with a fabric first approach). Choice of heating technology will influence overall energy demands (some systems are more efficient than others) - and can also address cooling needs.
- **Requiring enough on-site energy generating capacity to match total EUI** – to be net zero carbon in operation energy demands need to be met renewably and ideally through on-site energy generation which matches the development's total EUI. Encouraging greater decentralised energy production through more onsite renewables (especially if coupled with energy storage) also reduces strain on the wider energy grid and increases energy security.

5.5 Additionally, whilst recent (and further planned) tightening of Building Regulations will make direct burning of fossil fuels for energy in new buildings more challenging in future, Policy R1 specifically sets out that these systems will not be permitted. This will have benefits not only for avoiding direct carbon dioxide emissions, but also avoiding costly future retrofits for occupants, as well as for local air quality.

Addressing energy efficiency and setting energy use targets

5.6 With direct fossil fuel burning omitted from new buildings, the focus of design then needs to be on energy efficiency. Policy R1 requires that design of development is led by the principles of the energy hierarchy which helps to ensure buildings are as efficient as possible. These principles can be applied to various scales of development, from a simple extension up to a multi-building development and seek to guide energy efficient design through several different levels of action, which the National Design Guide summarises in the following way:

1. Reduce energy need (be lean) – through passive design measures
2. Be efficient in energy use (be clean) – use energy efficient systems such as heat networks for lighting, heating/cooling, operation etc.
3. Source energy from renewables (be green) – source remaining energy needs from renewable technologies, including decentralised sources.

5.7 The policy sets targets for total operational energy used in the building via an Energy Use Intensity (EUI) target, which is the total energy used by the development in a year as measured at the meter divided by the gross internal area (m²). The use of EUI as the key performance metric accommodates for both regulated and unregulated energy sources to that comprise all operational energy uses in the building. The EUI calculation also allows for easier verification of real world performance of the building as built and can better represent how the building will perform in terms of energy use.

5.8 Additionally, alongside the total energy use/EUI target, the policy also sets a target for the energy associated with space heating. This is because the primary source of energy use in our buildings is the energy used for heating (and cooling) and it is important to ensure that the overall energy balance of the building is not overly dedicated to space heating alone. A space heating target helps to promote a ‘fabric-first’ approach to design and encourage more efficiently designed buildings that take less energy to heat (and cool).

5.9 These targets help to reinforce the first couple of steps in the energy hierarchy by promoting reductions in energy use through careful design choices. Additionally, the requirements will have other important benefits. For example, buildings with an inefficient layout or poor fabric efficiency, take more energy to keep comfortably warm (or cool), which is a particular issue when coupled with high energy prices which can increase risk of fuel poverty.

5.10 When coupled with other design features, they can also help to reduce the risks of overheating by maintaining a comfortable temperature indoors all year round (reducing heat infiltration during summer). Equally, in the context of the known constraints on existing electricity infrastructure, more efficient design helps to reduce additional energy demand being imposed by new development and the carbon emissions associated with grid electricity whilst power plants still rely on some level of fossil fuels.

5.11 The policy includes specific energy targets for EUI and space heating. In setting the specific targets for the total energy demand/EUI and space heating requirements, the Council has considered a range of sources. This includes recommendations from national industry best

practice such as produced for the [UK Net Zero Carbon Standard](#), the [Low Energy Transformation Initiative](#) (LETI), the Committee on Climate Change, and others. It also includes a review of technical feasibility studies produced to inform similar adopted or emerging Local Plan from other local authorities (as summarised in the separate Net Zero Carbon Technical Feasibility literature review), as well as previous engagement responses on the development of the Local Plan (and the withdrawn Local Plan 2040).

5.12 In particular, the various sources above identify that whilst residential developments tend to be more standardised in energy performance, non-residential development typically have more variety and generally higher energy demands which can only be reduced so far. There are also particular challenges for high energy demand uses, such as those associated with some types of healthcare, as well as research (e.g. labs). This has led to Policy R1 including varying EUI targets for residential and non-residential uses, as well as an additional allowance for high energy demand uses to justify exceeding targets where necessary through their application (having made every effort to ensure other elements of the policy are met).

Requirements for renewable energy generation on new development

5.13 The other factor intrinsic to net zero carbon design is ensuring that the energy needs which cannot be designed out through efficient design are being met through clean, renewable sources wherever possible (step 3 in the energy hierarchy). Policy R1 therefore sets out that the overall EUI figure for the development needs to be met with sufficient renewable energy generation which should ideally be installed onsite. Keeping operational energy demands as lean as possible by meeting the minimum targets referenced earlier helps to reduce the amount of onsite renewables needed.

5.14 It is acknowledged that some types of development will struggle to match total energy demand through installation of sufficient onsite renewables. This is particularly the case for high energy demand uses, as well as constrained sites with limited roof space (e.g. for rooftop solar PV). The policy allows for different ways to overcome this challenge, including installing renewables offsite on land elsewhere that is within control of the applicant. Equally, there is an allowance for making a contribution into the Council's energy offsetting fund (discussed further below), which would utilise financial contributions from the applicant to pay for installation of an appropriate amount of renewables, or potentially other energy saving retrofit measures, elsewhere in the city.

Additional considerations which have informed the approach to net zero carbon

5.15 Whilst policy R1 has a number of prescriptive targets which relate to the performance of the building as outlined above, it is also important to highlight that the approach continues the existing LP2036 one of being technology agnostic. In practice, this means that flexibility is retained for applicants to justify the most appropriate technologies for their site in order to attain the targets and the policy is future-proofed where new technologies arise in future.

5.16 In relation to heating/cooling, often air source heat pumps are likely to be most effective, particularly as these systems are much more efficient than other systems like direct electric heating. However, the policy also encourages applicants to consider connection into heat

networks where this could offer a more sustainable option. The policy also supports the development of new energy centres and heat networks in recognition of the role these can play in supporting decarbonising of the city's energy systems.

5.17 The policy includes minimum energy performance targets which should be feasible for most development and that are comparable to best practice for net zero carbon development today. However, the Council acknowledges that there are likely to be challenges for some types of development, and where difficulties arise, the policy seeks to set out a clear and consistent approach to how these challenges should be dealt with through the planning process. In summary, this includes:

1. An allowance for non-residential uses with exceptionally high energy demands to align with a higher Energy Use Intensity target where it can be robustly justified, including the measures taken to limit this.
2. An allowance for offsetting as a last resort where the particular challenge of providing enough onsite renewables to meet total EUI cannot be fully met.
3. Where any other individual performance target cannot be met due to specific constraints of an application, the policy requires the proposal to demonstrate net zero carbon overall (in no circumstances will direct fossil fuel burning be a permitted solution to meeting needs). It also sets out a clear set of steps that an applicant should follow to meet the overall spirit of the policy.

Energy offsetting mechanism

5.18 Whilst the full process for the energy offsetting mechanism, including full offsetting costs, will be outlined in the Energy and Carbon Technical Advice Note, an indicative process and approach to pricing offset contributions is outlined below:

1. Applicants work through the policy criteria and clearly set out in their Energy and Carbon Statement how they have met this criteria.
2. Where any criteria cannot be met, applicants should set out robust justification for why the proposal is unable to meet the requirements. Justification should only relate to technical feasibility (e.g. site/design constraints).
3. The Energy and Carbon Statement should set out the total energy demand that needs to be offset because it is unable to be met through onsite renewable energy generating installations provided by the applicant. This would be devised by working out the total operational energy demand of the development per year, compared with the average annual renewable energy generation that can be achieved through installed renewables. The deficit in demand that cannot be met by renewables will be what is to be met through offsetting.
4. An S106/developer contribution will be agreed with the applicant as part of the planning application. The cost will cover the provision of an equivalent amount of renewable energy generation (or energy saving) elsewhere to match deficit onsite.

5.19 Policy R1 is focused on ensuring energy efficient development, meaning buildings designed to specified total energy use and space heating targets, as well as ensuring that all

energy needs are then met through sufficient renewable energy generation. Offsetting is only to be relied upon where a development is unable to meet its full energy needs through onsite generation, as such, the offsetting funds are envisaged to be utilised to support alternative energy generation schemes (or potentially to reduce energy demands in existing buildings) elsewhere in the city. The most practical way of delivering the offsetting requirement is likely to be the installation of rooftop solar elsewhere in the city, as such it is envisaged that the standard offset pricing is linked to the cost of providing comparable solar pv.

5.20 The energy offset fee is envisaged to be based upon the average cost for installing equivalent solar pv (per kwh) according to the regularly published national costs figures from the government. This would provide for a standard and transparent costing, which could be kept updated as the average cost changes over the lifetime of the plan. Administrative costs (e.g. 10% the offsetting fee) would be incorporated on top of the average solar pv installation cost as part of the overall offsetting payment. This would account for the Council's time and resource in establishing the offset fund as well as identifying, developing and managing appropriate offset projects.

5.21 It is envisaged that the pricing of these contributions would be published clearly on the Council website as part of the TAN, or separately, and updated regularly in line with the changing national cost of installing comparable renewables.

Addressing embodied carbon in the construction process

5.22 Despite the challenges identified earlier in this paper with addressing embodied carbon in the construction process, the Local Plan's Policy R2 is aimed at reducing embodied carbon through careful design choices. The policy sets out that all new development should demonstrate how the design process has considered embodied carbon emitted during the construction stage via their Energy and Carbon statement and includes a set of principles which are intended to be used as a framework guiding applicants in how to do this. The principles have been formulated to tackle the key drivers of carbon emissions (mainly at the construction phase) though not all will be relevant for every application and will depend on the context of the site and the type of proposal.

5.23 On larger scale development, the policy also requires completion and submission of Whole Life Cycle Carbon Assessment (WLCCA) demonstrating how embodied carbon has been quantified and reduced through the design process. Whole life/lifecycle carbon assessment is a process which details the predicted carbon emissions associated with each stage of a building's lifecycle, although the policy is focussed on upfront emissions related to construction specifically as these are most within the control of the applicant and design process.

5.24 Whilst the requirement for WLCCA is focussed on the largest developments, as these are likely to have the most significant carbon impacts, smaller scale development may still find WLCCA to be a useful way of evidencing how they have followed the other elements of the policy – but it is not a requirement.

5.25 Unlike Policy R1, Policy R2 does not set specific targets for reduction in emissions. The framing of the individual requirements set out above are, however, considered to be a pragmatic

step forward driving development in Oxford to start seriously thinking about issues of embodied carbon alongside designing to net zero carbon in operation from adoption of the Local Plan. In this way, the policy is intended as a stepping stone which lays a foundation for more rigorous requirements in future iterations of the Local Plan that can be further developed as industry knowledge on the subject and best practice matures (and if national policy continues to fail to take action). The approach also allows for a degree of flexibility on an application-by application basis where the balance between embodied carbon savings and other important placemaking issues which could ultimately result in a more sustainable development cannot be resolved easily.

5.26 The intention is to expand on the guidance for addressing principles as part of a supporting Technical Advice Note to accompany the policy, this will also allow the Council to signpost various independent guidance and best practice and keep this list updated as new references become available.

Supporting the retrofit of existing buildings

5.27 Beyond new development, there is a significant need for retrofitting existing buildings to meet net zero carbon goals, as well as to deliver climate adaptation. Many retrofitting measures, including installation of renewable energy generation technologies like solar panels, are classed as permitted development under the General Permitted Development Order (GDPO). This means that planning permission would not usually be required for such works – unless the buildings are listed or within a conservation area or if the works are more extensive than what is covered by the GPDO.

5.28 As these buildings have already gone through the planning process, the Local Plan has limited influence over them, except for where they come forward for planning permission associated with redevelopment in future. The Local Plan seeks to set out a clear signpost of support through Policy R3 for applications which involve retrofitting that would require permission.

5.29 Oxford has a high preponderance of older and historic buildings and many of these buildings will also require retrofitting in future, however, their particular qualities require additional consideration which policy R3 also makes clear. For example:

- Some types of retrofit that would be commonplace for most buildings, such as fabric efficiencies and improved air tightness, can be inappropriate for older buildings which rely on passive ventilation to control issues like moisture build up. Applying such measures to historic buildings can lead to problems of damp build up that can impact health of occupants and the building.
- Additionally, the Council also has a statutory duty towards protecting the historic environment which the Local Plan must also balance. In the case of designated assets, some solutions may not always be suitable, or will need to be carefully designed, especially where they might cause conflict or cause harm to the special features for which a building is protected.

5.30 The difficulty is that every historic building is different, and solutions that may be acceptable in some cases will be much more harmful in others. This variation in harm occurs even at the building scale, with certain facades being more sensitive than others. Policy R3 reinforces the position that the Council will recognise the public benefit of retrofit measures, however, in every case this will need to be balanced out against potential for harm. This is an important caveat which reflects our responsibility towards preserving Oxford's unique heritage and ensuring change is managed in the right way for these features. To aid applicants, the policy includes some general principles which proposals should demonstrate have been addressed in the design rationale for any intervention to aid in securing the most successful application.

5.31 A key aspect of the policy is the explicit reference to the need for taking a **Whole Building Approach** to retrofitting traditional buildings (including designated buildings). This is a way of ensuring that alterations to buildings are informed by a careful and methodical understanding of the context of the asset, its surroundings, and how it performs so that the correct interventions are selected for the sustainability of the structure and the health of occupants. This is particularly important for avoiding harm to valuable heritage features, but also for ensuring that improper retrofit measures that might cause harm to the functioning of the building and/or occupants' health are avoided. By showing that a proposal has been informed in this way, the applicant will be better positioned for a successful application.

5.32 The Local Plan policy is but one tool to help encourage retrofit of existing buildings. An update to the Council's existing Technical Advice Note on retrofitting historic buildings, available on the website [here](#), will also help elaborate on the policy requirements with additional guidance and useful resources.

Ensuring new development is resilient to climate change

5.33 The Local Plan includes a range of policies which seek to drive more climate resilient design in new development. Most directly, policy G9, seeks to ensure applicants consider current and future climate projections and use this to inform their design. It also sets out a range of resilience measures that should be included where applicable, including measures to address overheating, water use, flooding.

5.34 Naturally, policy G9 crosses over with various other policies, particularly in chapter 4, including requirements for greening (which can bring multiple adaptation benefits in terms of managing water run off, flood risk and cooling); as well as for dealing with flood risk. Equally, there is some overlap with requirements for Health Impact Assessment, which would increasingly need to consider health risks posed by climate change.

5.35 More broadly, the Local Plan's policy G1 seeks to protect a network of green space in the city, and climate resilience was one consideration in defining the GI network, with spaces providing for significant amounts of flood storage (areas with more than 50% flood zone 3b) being assigned to the core GI network. Protecting open spaces will not only help

to ensure resilience against climate change in terms of people's health, but also help wildlife to adapt to climate change by being able to move through the city as easily as possible.

Appendix A – Policy options and preferred approaches

Policy options set 008a (draft policy R1): Net zero carbon buildings in operation

It is clear that the built environment contributes overwhelmingly to Oxford's existing carbon footprint as existing buildings contribute to emissions arising from the energy used to heat and power them. New buildings coming forward in the city will only add to these emissions unless they are designed to operate as net zero carbon buildings (which do not emit net additional carbon dioxide emissions in order to function).

Whilst the current Local Plan already requires improvements in carbon dioxide emissions over national building regulations standards, the current requirements do not ask for net zero carbon design. National buildings regulations are expected to be updated in future, and require net zero carbon ready development, but these will not deliver true net zero carbon buildings in operation (because Building Regulations does not address all energy sources in a building – only 'regulated' energy sources).

The options for policy that have been considered for the Local Plan therefore relate to how much further local standards should go beyond what is asked for in national building regulations now or in future. They also include whether or not to allow for off setting on trickier sites.

Table 1 - Policy options set 008a Net zero carbon buildings in operation

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Specify design in accordance with energy hierarchy principles (including fabric-first) for all new development and permit no fossil fuel use in new buildings.	Designing in accordance with the energy hierarchy will help to ensure buildings are as efficient as possible from the ground up. Energy use is the primary source of carbon emissions from buildings in operation, tackling this will support carbon reduction but also potentially help address issues of fuel poverty and reduce demand on the wider energy grid.	Different types of application will have varying opportunity to apply the energy hierarchy – for example, it may be easier to take a fabric first across a new self-contained dwelling, compared with an extension to an existing dwelling. This could add complexity or confusion in the design process. There may be circumstances where there is a need for relying on fossil fuel systems – potentially where grid

	Preventing any additional fossil fuel combustion heating systems will help to reduce the need for retrofit later. This could also ensure that new development does not contribute further to air pollution, including NO2 levels, but also Particulate matter levels (PM) in the city. Direction of travel, including previous updates to Building Regs already (and will further) disincentivizes fossil fuel systems like gas boilers. Policy would lock in local commitment and ensure all new development accords with it from adoption of the plan.	constraints are unable to support fully electric systems for example. Equally, there may be opportunities for future technology advances to enable the transition of fossil fuel systems to cleaner sources (e.g. infrastructure and gas boilers being upgraded to function using hydrogen), although this is highly uncertain.
Option b Mandate net zero carbon in operation (applying to <u>regulated</u> energy only) from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as the primary calculation. Set targets for: - regulated energy use in the building, and - energy use associated with space heating, and - this energy use to be met through equal amount of new renewable energy generation (ideally onsite). Encourage net zero unregulated energy to be addressed as part of overall	Regulated energy use is a well understood area of operational energy consumption and there is good understanding about how to decarbonise it. It is currently addressed as part of Local Plan 2036 so would keep in line with current practices. Assessing net zero carbon performance using an Energy Use Intensity (EUI) calculation would measure energy use as recorded at the meter and is more reflective of performance. Measuring via EUI instead of traditional carbon % reduction targets allows for better comparisons of performance between buildings also.	The option is not in line with the government's current policy guidance for Local Authorities. A more prescriptive policy, with specific targets could limit innovation and become outdated more quickly, whilst also making for an overly technical policy. It may be difficult to set targets that are realistic for the range of building types that could come forward under non-residential development (e.g. schools, offices, warehouses etc). Encouraging net zero unregulated energy through the policy would not be as strong

approach where possible (e.g. seek opportunities to reduce, and to meet through additional renewable generation capacity).	Policy would still encourage developers to address unregulated energy where possible, which may secure some additional benefit for energy use/emissions associated with this type of energy use, but would not make it compulsory.	of a requirement as requiring it. This could have implications for power grid capacity considering expected increasing demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing climate change, or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.
Option c Mandate net zero carbon in operation (applying to <u>regulated and unregulated</u> energy) from adoption of the Plan. Measure performance using Energy Use Intensity (EUI) as primary calculation. Set targets for • total energy use (regulated and unregulated) in the building, and • energy use associated with space heating, and • this energy use to be met through equal amount of new renewable energy generation (ideally onsite).	Similar positives to option b, however, option c would resemble a more reaching policy encapsulating decarbonising of unregulated energy sources also. Unregulated energy can be a significant component of the total operational energy use of a building and it will need to be decarbonised in the same way as regulated energy in order to meet future net zero targets. This option would seek to ensure unregulated energy needs are met through sufficient on-site generation wherever possible, potentially reducing demands for power from the main power grid. This policy option is considered to be the most well-aligned with the measures	Similar negatives to option b, however, option c is likely to be much more challenging. Again, the option is not in line with the government's current policy guidance for Local Authorities and strays further in scope (than option a). Unregulated energy use is predominantly determined by occupant behaviour within the building once in operation, something that planning policy and the design/ construction process has limited influence on. There could be particular challenges for high energy demand, non-residential uses, such as healthcare and research (such as labs) with bespoke equipment needs central to their operation. Some flexibility may need to be built into targets used in such a policy.

	needed to accord with the city's 2040 Net Zero Carbon target (and roadmap/action plan) as well as the national net zero 2050 target. It should help boost micro-generation of renewable energy across the city and mitigate need for future retrofitting. It also accords with the majority of industry guidance for designing to net zero carbon in operation e.g. (LETI, BRE GROUP etc).	More constrained sites and/or certain buildings (e.g. with limited roof space) may struggle to meet unregulated energy demands through on site renewables and may be pushed towards other forms of offsetting.
Option d Mandate 'net zero ready' buildings, in line with the principles in the proposed Future Homes/Buildings Standard (which apply to regulated energy only). Measure compliance via national Building Regs calculations (e.g. SAP/ SBEM) demonstrating carbon reduction over notional building. Encourage net zero unregulated energy to be addressed as part of overall approach where possible. (e.g. seek opportunities to reduce, and to meet through additional renewable generation capacity)	This approach represents a less advanced one to options b and c but would be closer to the direction of travel outlined by central government in its consultations on the Future Homes/Buildings Standard. It would mandate the requirement for net zero ready homes from the Local Plan's adoption, even if the national standards are delayed or watered down and would seek to ensure that no further retrofit is needed to new developments in the future to bring them to net zero as the national grid decarbonises. Recognising that the proposals set out in FH/BS do not currently address unregulated emissions, this policy would still encourage developers to address unregulated energy through ensuring sufficient on-site renewable energy	Net zero ready development as currently set out in the Future Homes/Buildings Standard does not address total operational energy of buildings and would omit emissions associated with unregulated energy. Development built to this standard would not be net zero in terms of regulated energy until the national grid has fully decarbonised either, thus would be responsible for continued emissions. Encouraging net zero unregulated energy through the policy would not be as strong of a requirement as requiring it. This could have implications for power grid capacity considering expected increasing demands on electricity nationally with the shift to net zero. Ultimately, this option could risk the city not meeting its targets in addressing

	generation and to demonstrate this via submission of EUI calculations.	climate change, or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.
Option e For challenging typologies of development that have exhausted all onsite options to meet operational energy demand in line with other policy requirements, accept offsetting as a way to mitigate impacts through paying to provide offsite retrofitting to existing buildings elsewhere. Set out strict principles for how/when this would be accepted including that this option is a last resort . This would be framed as 'energy offsetting' (rather than carbon offsetting) and tied to the energy calculations of demand versus generation for the development.	Due to the constrained nature of many sites in the city, it may be difficult to incorporate technologies such as renewables onsite (or find spaces offsite) to balance out energy use, thus offsetting may be necessary. It could be an option where all other approaches are exhausted. Collection of an offset fund could potentially create a pot of money which could be utilised to deliver carbon reduction measures elsewhere in the city (e.g. existing buildings in need of retrofit).	There is the risk, as evidenced elsewhere with similar schemes, that offsetting could be more attractive than delivering onsite measures leading to poorer performing buildings. Offsetting shifts the problem of carbon emissions elsewhere and does not address the real need to deliver truly net zero buildings from the beginning. Offsetting projects would need to be identified, resources would need to be found to monitor their delivery, manage the fund, and ultimately ensure a 1-to-1 offset in carbon emissions between the project and the contributing development.
Option f Set no local standards on net zero carbon design of new buildings. Conform with the approach advocated by the Written Ministerial Statement 2023 and rely on national standards set out in Building Regulations, including the upcoming uplifts associated with Future Homes/Building Standard which is envisaged to deliver 'net zero ready' development from 2025 onwards.	Similar to option d but not setting any expectation/local direction on net zero carbon design standards. This option would mean greater consistency for developers building in Oxford compared to elsewhere and less complexity in the planning application process. At the design stage, regulated emissions are the primary area that can be influenced thus Building Regs process could achieve this.	This approach ignores the local context of Oxford, such as its 2040 local net zero carbon target. Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed (at time of writing the results of the last consultation on the options it proposed have not even been released).

		Even when in place, the updated building regs will not deliver net zero carbon until the grid is decarbonised, it will also not address unregulated/embodied carbon (in its current proposed form). Ultimately, this option would be even more likely (than other options) to risk the city not meeting its targets in addressing climate change or achieving local (2040) or national (2050) net zero goals, particularly where national grid takes longer to decarbonise.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - various options/combinations e.g. A+B, A+C, A+D, E, F

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: In terms of options, it would be appropriate to consider having a policy or not as there is no specific NPPF demand either way, though local context supports the inclusion of some sort of policy, the considerations then are how far such a policy goes in requirements. The options that the Council has considered represent various approaches to setting policy for new development to deliver upon net zero carbon in operation through use of various combinations of requirements relating to: types of energy addressed (e.g. regulated or unregulated); use of specific targets for energy use (space heating and total); requirements for renewable energy generation; as well as the methodologies for calculating performance (e.g. SAP or EUI). Whilst options b, c, d and f, represent four alternative approaches, some of the options (options a and e) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside one of the other options, as with option e (offsetting) which is less likely to stand alone.

In terms of sustainability impacts, the different options all relate primarily to levels of mitigation that the Local Plan could ask for in relation to new developments' energy use and carbon emissions and would be assessed against similar criteria within the SA assessment framework – particularly criteria **1. Carbon emissions**, **2. Resilience to climate change**, but also potentially **5.**

Inequalities (because of potential influence on fuel poverty) and **11. Urban design** (because higher standards may push towards more standardised design styles/shapes in buildings and limit design innovation). As the differences between the options are essentially in how they propose to technically implement net zero carbon design, as well as in how far they push in terms of standards applicants must meet, there would be some variety in the extent of any impact each option would incur against the SA criteria – particularly the extent of positive impact under criteria 1. 2. and 5. and variation between neutral or minor negative impact under criteria 11. (because as standards get stronger and potentially limit design). Option f would mean no local policy requirements, however, this is likely to still be accompanied by some positive impact for criteria 1. 2. and 5. because of the expected tightening of national building regs to move new development towards being net zero ready, although the positive impact is going to be reduced and would take longer to begin to take effect (it is likely to be negative/neutral in the immediate term). Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Net Zero Carbon buildings in operation – Policy R1

The preferred approach is to take forward a combination of **options A, C and E**. Whilst the approach would risk not aligning with central government expectations (because it sets energy standards for development that exceed national standards), this approach is considered necessary to ensure new development does not compromise the city's ability to meet net zero carbon targets in future.

The combination of **options A and C** will help reduce need to retro-fit buildings in future and also help to address risks of fuel poverty for occupants of new buildings by reducing energy demands to operate buildings and drive renewable energy onsite, which can help with bills. Equally, driving more energy efficient buildings are important for reducing burdens on the wider energy grid.

The addition of **option E**, which makes an allowance for offsetting is considered to be a necessary and pragmatic approach, recognising that delivering net zero buildings in operation will be challenging for some typologies. It should only be allowed for as a last resort, once all onsite options for meeting the rest of the policy have been explored. Where utilised, the offsetting mechanism could help to deliver retro-fitting of existing buildings, which is also a potential positive (though the preference is for the mechanism to be used sparingly, if at all).

Policy options set 008b (draft policy R2): Embodied Carbon

In addition to the carbon dioxide emissions related to a building whilst it is in operation, there is also an upfront embodied carbon cost associated with constructing them as was touched upon earlier. Embodied carbon in construction can be influenced by a wide range

of factors, from the types of materials used in construction, to where these are sourced from and how they are processed, making this topic a highly complex one, subject to various considerations. As set out in Section 3 of this paper, the balance between addressing embodied carbon and achieving other place-making concerns in the planning process is not always clear either.

The stronger and more explicit a policy is, the more challenging it could be to implement, particularly as national guidance and industry understanding is still emerging. Nevertheless, whilst the current Local Plan is not explicit in requirements to reduce embodied carbon, it is important that development at least begins to consider and take action to address this topic in order to mitigate impacts on the wider environment and climate change. The options for policy relate to how far the Local Plan should go in requiring applicants to address embodied carbon.

Table 2 - Policy options set 008b: Embodied Carbon

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include high level principles for limiting embodied carbon, including the importance of retaining existing buildings where possible. Guidance would be expanded upon in accompanying technical advice note (TAN).	A strong set of principles for addressing embodied carbon (an area where industry guidance/learning is more limited at present) would ensure the issue is not ignored, whilst leaving flexibility for applicants to respond in the most suitable way per application. Providing more detailed guidance in an accompanying TAN would allow for expectations to be expanded upon and guidance to be regularly updated considering evolving knowledge/guidance which is less developed than for addressing operational energy.	This is an area of evolving guidance and understanding and broad principles could be difficult to formalise in policy. Equally, principles need to retain a level of flexibility to enable innovation and adaptation to specific context of individual sites and schemes.
Option b <i>Unless superseded by future updates to Building Regulations (or other national policy).</i>	Requiring larger development to measure embodied carbon at the construction stage will allow for improved understanding of the embodied carbon	Assessment methods for measuring embodied carbon in construction can be resource intensive and could be challenging for some smaller scale major

Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology and require applicants to demonstrate specific actions taken to reduce this as much as possible. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and reduced.	problem. It will enable a more informed approach to addressing the issue and requiring applicants to demonstrate how they have taken action to reduce it will be an important step forward in delivering net zero construction. This could be expanded upon in future iterations of the local plan as national guidance and understanding on this issue grows.	development – setting an alternative/appropriate threshold for where these would be required may require further consideration. Demonstrating actions to reduce embodied carbon in major schemes is less prescriptive than setting a fixed maximum target for embodied carbon. It also risks a lack of clarity for applicants about how far the Council expects them to go in justifying their approach in an application and in the level of detail they will be asked to provide.
Option c <i>Unless superseded by future updates to Building Regulations (or other national policy).</i> Set more specific requirements for major development requiring a measurement of embodied carbon during construction through a recognised methodology. Require applicants to demonstrate that they have kept embodied carbon levels to within a specific maximum target for embodied carbon on new developments. Applicants would complete and submit a Whole Life Cycle Carbon Assessment demonstrating how embodied carbon has been quantified and how they have aligned with policy target.	Same benefits as option C but going further requiring that embodied carbon levels are kept to within a certain limit. This is likely to have more effect at reducing overall embodied carbon footprint of new development. Clear targets could also provide greater clarity to applicants about the level of action the Council expects them to take/demonstrate in order to address embodied carbon in the design process.	Setting specific targets to comply with will reduce the level of flexibility for applicants to respond to various drivers influencing design of proposals on particular sites. Rigid targets may not be achievable on some sites in the city and this more prescriptive approach to policy would make their redevelopment more challenging. Setting specific targets could be challenging at policy level considering the complexities of accounting for it in construction processes and the evolving nature of guidance/industry knowledge on this issue. Equally, it may be challenging for applicants to deliver upon

		or satisfactorily respond to in a planning application. Alongside net zero carbon in operation, targets for embodied carbon are likely to have additional viability impacts.
Option d Do not include any policy requirement setting principles or targets/requirements for measuring embodied carbon.	There is potential for future updates to national policy/ Building Regs that would address embodied carbon, which may render reference in the plan unnecessary.	Previous updates to Building Regs have been slow historically, and Future Homes/Buildings Standard is not yet guaranteed. Even when in place, the updated building regs will not deliver net zero carbon until the grid is decarbonised, it will also not address unregulated/ embodied carbon.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Yes, various options (e.g. options A alone, A+B, A+C, D)

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: Option a proposes setting general principles for applicants to follow in order to take action on reducing embodied carbon, whilst options b and c represent alternative ways of setting further standards for larger scale developments. Both options b and c require these types of applications to submit evidence showing they've quantified their embodied carbon and quantifying how much they have reduced this, however, option c goes further and sets a specific target that should not be exceeded. Option d is to set no local policy requirements for addressing embodied carbon.

In terms of sustainability impacts, the impacts arising from the options most directly relate to SA **criterion 1. Carbon Emissions**. For this criterion, option a is likely to have a slight positive impact, though will depend upon implementation, and may not result in any significant reductions in embodied carbon emissions. Option b and c have increasingly positive impacts as they begin to set

standards for quantifying the emissions and actual reductions secured, so are likely to have more meaningful impact, though they will not negate all emissions so the positive impact would be minor overall. Option C is

Embodied carbon in the construction process – Policy R2

The preferred approach for this topic is a policy that comprises of **options A and B**. The policy approach would essentially act as a stepping stone, introducing requirements for the city where very little currently exist, but also recognising that embodied carbon is an area of complex topic and one where understanding is still emerging.

Option A would apply to all proposals, but the principles it would propose will vary in relevance depending on each specific site context and type of development proposed. The principles would act as important considerations to guide applicants when designing their proposals, whilst remaining flexible enough to respond to the varying context that each application for development is brought forward in. **Option B** would seek to push larger developments towards taking more explicit action in addressing this topic. Whilst the option does not impose specific targets to limit embodied carbon to, which some may feel limits the effectiveness of the policy, it would help to ensure the largest schemes with the most significant potential impacts are transparently calculating embodied carbon and specifically demonstrating the types of measures they propose to reduce this and by how much.

The options together will help to improve awareness and understanding around this topic which will be of increasing pertinence in future. They will form an important step forwards towards potentially more stringent requirements in future, either locally or nationally.

Policy options set 008c (draft policy R3): Retrofitting existing buildings including heritage assets

The Local Plan will have limited influence over existing buildings that have already gone through the planning process, yet the earlier analysis in this background paper highlights that these buildings collectively form a significant source of carbon emissions which will need to be retro-fitted to help achieve local and national net zero targets. Many retro-fitting measures, such as fabric efficiency and installation of renewables, can be undertaken without planning permission, but where permission is required the Local Plan can help applicants to approach these projects in the right way.

This is particularly important for traditional buildings and heritage assets which can have special qualities which need to be conserved (particularly where these benefit from national designation). It will also help avoid problems of maladaptation which could lead to negative impacts for occupants' health (e.g. impairing passive ventilation processes many of these buildings rely on and that

is essential for avoiding damp build up). The options set out for this topic therefore mostly focus on how the Local Plan policy should treat applications impacting traditional and historic buildings.

Table 3 - Policy options set 008c: Retrofitting existing buildings including heritage assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.	This policy recognises the high priority afforded to the retrofit need in the city and seeks to ensure that retrofit measures that require planning permission will be supported wherever possible – particularly where demonstrable benefits for climate (mitigation or adaptation) can be evidenced. It highlights that as a starting point, such measures are presumed to be acceptable on planning grounds. This additional certainty is intended to support and encourage more occupants to pursue retrofit projects.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. Whilst this policy would highlight the importance which we assign to supporting retrofitting measures in existing buildings, there will be other material considerations which have to be weighed up against this policy and could still ultimately be determined to outweigh this presumption in favour.
Option b In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm.	This option addresses the retrofit need in the context of historic buildings and heritage assets and responds to the particular challenges present in the need to balance heritage considerations. It guides applicants to follow Whole Building Approach in order to ensure retro-fit maximises opportunities for	Same negatives as for option a as well as the following: Listed buildings and other heritage assets are afforded statutory protection which is over and above that given through planning controls. Great weight is given to preserving or not harming the

Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note (updated from the current version of TAN 15 supporting Local Plan 2036). This additional supporting guidance could expand on this complex topic such as by flagging measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit.	carbon reduction/climate adaptation and minimises potential for harm to the asset or its occupants (e.g. through maladaptation). Same benefits as option a, however, this option would seek to provide further certainty for how retrofit of heritage assets will be considered through the planning application process. It would provide clarity on how to approach design of retrofit projects for these assets, setting out the key issues the Council would want to see addressed in an application for it to be successful. Yet this option would also benefit from leaving flexibility for approaching each project in a way that is tailored to the specific context of the site and the particular features for which it is protected. Would also help to address the complexity in navigating how harm to heritage assets needs to be balanced with benefits of retrofit (e.g. carbon reduction/climate adaptation) in the decision-making process.	significance of these heritage assets, and this must be borne in mind when considering measures of change to buildings or retrofitting measures to combat or mitigate the impacts of climate change. In supporting retrofitting of older buildings, a policy will have to take account of the protection afforded to heritage assets and the need to preserve their values. Setting out principles that applicants would be expected to follow, as opposed to specific measures that would be acceptable or not, would still leave a fair amount of site-specific analysis for occupants to undertake. They would still need to set out project-specific justification for why a particular design (and set of retro-fit measures) has been selected. There is a risk that this quite complex topic of retro-fitting heritage assets remains a challenging one to navigate for applicants.
Option c In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate	Similar benefits as options above but without the additional flexibility for approaching site specific considerations relevant to retro-fit of heritage assets as is offered in option b.	Same negatives as above aside from the point about flexibility as is offered in option b which seeks only to set out key principles to follow.

adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on this through guidance in an updated version of Technical Advice Note 15.	Listing specific retrofit measures that would be more or less suitable in a policy potentially provides greater certainty to applicants as to which measures would be more appropriate versus those that would be viewed as more harmful in a heritage context. It might reduce some of the uncertainty around what would be acceptable for such applications.	In addition, option c's approach of setting out specific measures in the policy that may cause more or less harm would have its own potential negatives. This is because it is likely that identifying a strict list of measures that cause less harm in a policy will be challenging when the character and value of heritage assets and their setting varies so much across the city. Such a policy is likely to be highly complex to present in the Local Plan and subject to many caveats because it is unable to grapple with the level of detail needed to be truly helpful to applicants (and likely better suited to an optional Technical Advice Note instead). Ultimately, decisions will still have to be made on a case-by-case basis, thus the benefits of this approach may be undermined.
Option d Do not include policy addressing retrofitting of existing buildings and/or heritage assets.	The local plan has limited direct influence on retrofitting of existing properties unless they need planning permission (many small-scale improvements are considered permitted development and would not). Any such policy can only be supportive, as and when such measures do require planning permission. It would also be limited by the need for balancing other	This would ignore the significant need for pursuing retrofit projects on existing buildings in the city to reduce our carbon footprint. Any policy in the plan is likely to have limited effect in directly driving retrofit measures, however, by highlighting that such measures would be supported and providing clarity on what is most appropriate where, this could help to

	relevant planning issues in the decision-making process (such as any potential harm to protected heritage features).	avoid the planning system being seen as a barrier to uptake where such measures are planned and require planning permission.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Yes (e.g. options A, A+B, A+C, D)

High-level screening conclusion? - the options should be screened in for detailed appraisal

Screened in for detailed appraisal? - Yes

Rationale: Option a sets out a presumption in favour of retro-fitting for non-heritage buildings, meanwhile, options b and c are alternative approaches for how local policy could support retro-fit on heritage assets and represent alternative approaches which could be combined with option a. Option d would mean no local policy requirements in relation to retro-fitting.

Options a, b and c would all likely have some positive impact for **SA criterion 1. Carbon Emissions** and **SA criterion 2.**

Resilience to Climate Change through establishing a local policy environment that is as supportive and enabling of retro-fit of existing buildings in order to achieve carbon reductions/energy efficiency or climate adaptation. Option b and c would have slightly more positive impact as they would also relate to the city's various historic buildings. Local Plan policy cannot enforce retro-fit of existing buildings and, in relation to historic assets, there are also other competing considerations that may limit the positive impact, meaning the options are likely to result in minor positives at best. Whilst Options b and c might increase the scope for positive impact against criteria 1. and 2., because these options would explicitly support sensitive retro-fit on heritage assets, they do also introduce the potential for harm to the special characteristics for which many are designated – thus resulting in a potential negative impact against **SA criterion 11 Urban Design and Historic Environment**, though the extent of this impact would depend upon implementation and types of assets that are retro-fitted, but should be reduced through following the key principles such a policy would set out. Option D would result in neutral impacts against the criterion because it would neither cause additional harm (indeed emissions are likely to continue to reduce in some respects e.g. as national grid decarbonises), nor will it result in specific positive impacts (there is no national requirement to undertake retro-fitting).

The balance between competing priorities of reaching net zero through retro-fit and also continuing to preserve and enhance the historic environment which is intrinsic to Oxford is a complex one. Whilst the potential sustainability impacts arising from the

options are not expected to be significant, the extent of negative impacts under options b and c could vary. Based on this initial screening, it is suggested that the option set should be scoped in for further detailed appraisal.

Retro-fitting existing buildings including heritage assets – Policy R3

The preferred approach for policy addressing retro-fitting in the new Local Plan is a combination of **options A and B**. This would make it clear that the Council supports retro-fitting existing buildings, but that for traditional buildings and heritage assets this support is contingent on applicants demonstrating they have approached the design of retro-fit projects in the right way.

Option B includes that the policy would set out the need for taking a Whole Building Approach to retro-fitting traditional buildings and heritage assets along with some other key principles to follow. It would then refer applicants to a more detailed Technical Advice Note, which can be kept updated as regularly as needed, to provide additional guidance. This would ensure that the key considerations that an applicant needs to address as part of their application are set out in the policy. However, it would allow flexibility to take into consideration varying contextual factors that might need to guide design on a case-by-case basis, as there is unlikely to be a one-size-fits-all solution that will work for every building and site in the city.

The option set was scoped in for testing through the Sustainability Appraisal (SA) to better understand the effects of each option and any potential for significant effects. The SA testing indicates that this preferred approach would have the most sustainability benefits according to the SA testing, although potential for negative impacts in terms of the historic environment would need to be mitigated through careful wording of the policy in terms of guidance for applications impacting traditional buildings/heritage assets.

Policy options set 008d (draft policy G9): Resilient design and construction

Oxford is at risk from climate change, particularly in relation to increased flood risk, water stress, overheating and more intense weather events generally. Climate resilience will be supported by various policy areas in the Local Plan, and various climate adaptations such as greening can have multiple benefits not just for making places that are healthier and more comfortable for people. A specific policy could be beneficial in ensuring that the key issues of relevance are flagged to applicants and in guiding them towards considering future climate as part of their design process. The options presented below relate to what this policy approach could look like.

Table 4 - Policy options set 008d: Resilient design and construction

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a discrete adaptation/ resilience policy, whilst continuing to address risks in other policies where relevant. Ask applicants to demonstrate how they have designed in accordance with policy via the design checklist or a separate checklist. Cross referencing to other relevant policy requirements (e.g. flooding) as well as incorporating other specific requirements such as: • Need for climate resilience impact assessment; • Details of a cooling strategy (for the building and surrounding spaces in large schemes, addressing alignment and shading) intrinsic to the design (not having implications for carbon use), including measures for addressing overheating risk for lifetime of development; • Measures to conserve/recycle water; • Flood resistance/resilience measures; • Supporting infrastructure such as electricity supply and broadband	Would set out a strong position/stance on the issue of climate adaptation and building resilience to climate impacts which could negatively impact on health and wellbeing. Bringing the range of policy areas into one checklist, ensuring applicants are looking at them through the lens of climate resilience, could be helpful. Would specifically pick up on issue of overheating, a key risk in the city moving into the future, and require applicants to detail what measures they have included in design/construction to address this and maintain thermal comfort for occupants during hot summer periods. Likely to go further than what is asked for in Building Regs alone.	Many aspects of climate adaptation will be dealt with through other policies, there is a danger of repetition e.g. with health, flood risk, design, and GI. Will need to find a consistent and concise way for applicants to demonstrate they have met these policy requirements without forcing them to repeat work in multiple places in their application. The design checklist would be one means of doing this. Could allow for cross-referencing to evidence prepared to meet other policy requirements where relevant.

designed to function in extreme weather conditions (such as prolonged periods of very high temperatures or heavy rainfall).		
Option b Require major development to achieve certification against a recognised sustainability assessment e.g. BREEAM/HQM.	There are several sustainability certification schemes in existence which are well recognised by industry such as BREEAM. These schemes often take a holistic view of design and ensure that considerations like climate change are weighed up alongside other design measures. Certification would ensure a high standard of sustainable design in major developments and help to ensure consistency across for applicants.	Schemes such as BREEAM are not specifically focused on climate resilience/adaptation alone, it is usually one element that is assessed amongst a range of sustainability considerations. Points that underpin certification can usually be scored across a variety of categories – though we could require points in certain places as we do at present with requiring 4 points under the water topic of BREEAM under RE1. This option would force applicants to pursue independent certification with a particular provider, though we could specify that any equivalent is acceptable to provide more flexibility. Relying on this kind of certification alone may not fully maximise climate resilience objectives. Likely to incur additional costs and resource demands for applicants.
Option c Address climate risks as theme purely through other policies e.g. design flood	Ensures resilience/adaptation is central to thinking across local plan policy framework.	Climate resilience aspects can be lost amongst other objectives when they are not given sufficient consideration.

risk, green infrastructure. No requirement for specific policy addressing issue.	Avoids repetition of requirements/considerations set out in other complementary policy areas (e.g. flooding and green infrastructure).	There are some specific adaptive measures, and wider sustainable construction issues which may not easily fit into other policy areas without making them overly long/ unwieldy.
Option d No policy on climate adaptation/resilience – rely on national guidance.	Some elements of building resilience to climate change will necessarily be covered elsewhere e.g. flood risk requirements are strong in NPPF, overheating within building regs.	Ignores local context – e.g. heritage, dense urban environment, as well as identified climate risks facing the city in future. National policy hasn't traditionally been particularly strong on adaptation. Could miss opportunities to tie together benefits for many complementing agendas – e.g. health, air quality.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Either option A, B, A+B, C, C+B, or D

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? - No

Rationale: The options represent different approaches to incorporating requirements for applicants to deliver climate resilient design into local policy or not. Option a would be to have a bespoke policy with a checklist of requirements for them to address where relevant and option c would instead scatter these requirements across other policies. Option B would instead require applicants to achieve certification against an independent sustainability certification scheme, which could be standalone or in combination with option A or C. Option D would be to have no local policy requirements about climate resilient design.

Most directly these policy options relate to **criterion 2. Resilience to climate change**, although the wide-ranging nature of climate resilient design means that these policy options can indirectly impact a variety of other criteria such as **criterion 7. Green Infrastructure** (where resilience measures include greening), **criterion 5 inequalities** (where resilient design reduces health risks

from climate change), though this is more dependent upon implementation and challenging to appraise. In relation to criterion 2, however, the options are all likely to represent minor positive impacts, other than option d, with the differences between them being more about how a local policy approach is implemented through the local plan. Option D is assumed to be neutral (because national policy has enough requirements to at least ensure some level of risk mitigation such as through national guidance on addressing flooding and Building Regs addressing overheating to some degree). Overall, the differences between the options are not significant enough in sustainability terms to warrant being scoped in for a detailed appraisal.

Resilient design and construction – Policy G9

The preferred approach is **Option A**. This acknowledges climate risk as a key issue for health and wellbeing of people and the sustainability of the wider city and will allow the Local Plan to guide applications in considering future climate change as part of the design process. The key issues of concern relevant to Oxford and its particular climate change risks can be set out in the policy and applicants can be encouraged to incorporate resilience measures to address them through the design process.

There is likely to be overlap with other policy areas, e.g. requirements for addressing flood risk, or providing green infrastructure, and information provided to meet other policy requirements can be used to support meeting this policy's requirements. The policy will help to ensure that these aspects of design are approached through the lens of adapting to climate change in particular, which may not always be the focus, and will help reduce the chances of opportunities for resilience building being missed.

Background paper 009

Title: Natural Resources including air, water, soil quality

This paper addresses the protection of Oxford's natural resources including the quality of air, water and land/soil.
Relevant Local Plan Objective(s): • Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.
Relevant SA Objective(s): 8. To reduce traffic and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve water quality targets and manage water resources.
SEA theme(s): Water, air, climatic factors, soil, material assets, landscape

1. Introduction	1
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	2
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	8
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	14
5. Key issues addressed through the Local Plan	16
Appendix A – Regulation 18 Policy options sets	18
Policy options set 009a (draft policy R4): Air quality assessments and standards	19
Policy options set 009b (draft policy R5): Water quality and resources	22
Policy options set 009c (draft policy R6): Soil quality	25
Policy options set 009d (draft policy R7): Contaminated land	28
Policy options set 009e (draft policy R8): Amenity and environmental health impacts of development	29

1. Introduction

1.1 This background paper addresses the topic of environmental quality and natural resources in the city. In particular, it focuses on three aspects of Oxford's environment: the quality of air, land (including soils), and water and the issues that relate to these different aspects of the environment.

1.2 Oxford is a small city with a tightly drawn administrative boundary and contains a number of physical and policy constraints which means that land must be used prudently. Where land is available, it needs to be used in the most efficient way possible while ensuring that there is no harm to the city's natural environment, human health and well-being.

1.3 The issue of poor air quality is multi-faceted and has various causes which are discussed in greater detail later. It is an important topic for the Local Plan to address because air pollution has a direct link with health and well-being and has been evidenced to cause and exacerbate health problems. Poor air quality also has negative impacts for the wider natural environment, especially our most sensitive ecological habitats.

1.4 Oxford has a long history of settlement with different parts of the city having been used for a variety of types of development in the past, some of which can leave behind a legacy of contaminated materials and other pollution which is another issue the planning process needs to address. The development process can play an important role in helping to identify historic contamination and contributing to its remediation to make it safe for future generations, however, where this is not carried out appropriately, people can be brought into contact with harmful pollutants that can damage health. Equally, it is important to ensure that the quality of our soils is protected as these act as important natural capital which supports the environment in a number of ways, from mitigating flood risk and supporting healthy habitats, to acting as important sinks of carbon which could otherwise be released into the atmosphere exacerbating our impacts on climate change.

1.5 Water quality issues have been brought to the forefront of planning since the introduction of the [Water Environment Regulations](#), which seek to ensure that the biological and chemical quality of watercourses in England and Wales reach a "good standard". Key concerns for the Local Plan to address include whether the availability of sufficient water resources for the existing and future population of Oxford. Also, that the quality of the water environment is preserved from further harm arising from new development, particularly because certain nature sites rely on certain amounts and quality of water to maintain the particular habitats and species for which they are protected.

1.6 The paper also considers wider issues of pollution such as impacts of noise and light which are also important for new development to address where necessary.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

2.1 There are a range of national and local plans, policies and strategies which form important context for the policies of the new Local Plan. Those of most relevance to the natural resources policies are summarised below.

National Planning Policy Framework (NPPF)

2.2 The NPPF addresses topics of natural resources and environmental quality in several sections. In particular, paragraph 187 of the [NPPF](#) states that policies should contribute to and enhance the natural and local environment in a number of ways including:

- Protecting and enhancing soils (in a manner commensurate with statutory status or identified quality in the development plan)
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

2.3 Paragraphs 196 to 201 of the [NPPF](#) set out various requirements relating to ground conditions and pollution including:

- Ensuring that sites are suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- Ensuring that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment
- Policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, (including presence of Air Quality Management Areas and Clean Air Zones). Identify opportunities to

improve air quality or mitigate impacts such as through traffic and travel management, and green infrastructure.

2.4 Paragraph 124 of the [NPPF](#) sets out principles for effective use of land and strongly emphasises making as much use as possible of previously developed or “brownfield” land (paragraph 125(c) unless it would conflict with other policies in the NPPF. Paragraph 125 also sets out that plans should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production. It also sets out that plans should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

2.5 Water supply and wastewater treatment is briefly referenced in the [NPPF](#), including that strategic policies should set out a strategy for and make provision for infrastructure to address this (paragraph 20(b)). Also, take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications of water supply (paragraph 162).

National Planning Practice Guidance, including National Design Guide

2.6 The Planning Practice Guidance (PPG) provides additional support for interpreting the policies of the NPPF related to these topics, for example:

- [Air quality guidance](#), covering topics such as: the air quality considerations planning and local plans address; information sources available to assess air quality; detail required within air quality assessments; and how can air quality impacts be mitigated.
- [Water supply, wastewater and water quality guidance](#), which sets out how this should be addressed within planning processes as well as where information can be obtained with respect to the water environment.
- The [natural environment](#) provides guidance on issues such as agricultural land quality, soil protection and brownfield land of environmental value.
- Land quality, is in several places including in guidance about [contaminated land](#) and [land stability](#), about how the planning processes should interpret and address these issues as well as potential mitigation measures.
- The [National Design Guide](#) sets out ten components of what the government considers to be good design. One of these components is the efficient use of resources including issues of prudent use of resources and factoring risks of pollution into the design process.

The Environment Act 2021

2.7 The [Environment Act 2021](#) does not revoke or replace the Environment Act 1995, but it does make amendments to strengthen and enforce adoption of the environmental provisions. The Act includes requirements for the Secretary of State for DEFRA, to set long-term legally binding targets on air quality, biodiversity, water, resource efficiency and waste reduction within the UK. Part 5 of the Act also aims to tackling discharge of sewage and places several duties on water companies regarding monitoring of water quality near storm overflows and sewage disposal works to secure a reduction in the adverse impacts of discharges from storm overflows.

Air Quality: other specific context

Air Quality Standards Regulations 2010 (as amended) and Air Quality Strategy

2.8 The European Directive 2008/50/EC was transposed to UK law through the UK [Air Quality Standards Regulations 2010](#). This legislation sets legally binding limits for concentrations in outdoor air of air pollutants that impact public health such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). Key limits are:

- the annual mean standard for NO2, which is 40 µg/m3 for humans and 30 µg/m3 for vegetation.
- Targets for fine particulate matter (PM2.5) set through the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, which require a maximum annual mean concentration target of 10µg/m3 to be achieved by 2040 (the AMCT), and a population exposure reduction target of 35% compared to 2018 to be achieved by 2040 (the PERT). Defra is [developing guidance](#) on how to consider PM2.5 targets in planning decisions.

2.9 The [UK Air Quality Strategy](#) sets out the UK government's plans for dealing with all sources of air pollution. The Environment Act 1995 Part IV of the Environment Act 1995 requires the Secretary of State to publish a national Air Quality Strategy and established the system of local air quality management. The Act also requires local authorities to regularly monitor air pollution in their areas against national targets and to take action where it is found that these targets are unlikely to be met. If areas are found to be in exceedance of the legal limit values and improvements are necessary, those areas need to be designated Air Quality Management Areas, and an Action Plan need to be developed and put in place by the local authority which set up the actions that are going to be put in place to address air quality.

Oxford City Air Quality Action Plan 2021-2025

2.10 Oxford City Council is committing to becoming the first UK Local Authority to set a local annual mean NO₂ target in a citywide AQAP. The [Oxford Air Quality Action Plan 2021-2025](#) sets an ambitious target of meeting a local annual mean (Nitrogen Dioxide) NO₂ target of 30µg/m³ by 2025. The overall objective of this AQAP for the whole of the Oxford City area is to achieve a local annual mean NO₂ target of 30 µg/m³ by 2025 “30 by 25”.

2.11 The Plan sets out 30 actions and measures that will be delivered by Oxford City Council and partners, via four priority areas of intervention:

- a) Developing partnerships and public education;
- b) Support for the uptake of Low and Zero emission vehicles;
- c) Reducing emissions from domestic heating, industry and services;
- d) Reduce the need to travel, explore opportunities for modal shift and increase the uptake of sustainable transport.

2.12 Progress against the targets is reported annually in the [Air Quality Annual Status Report](#), the most recent was published in June 2024.

2.13 The Council has produced a 2025 [source apportionment study](#), which has updated the known picture of the contribution of various sectors (e.g. transport, domestic, industry, etc) to the levels of the multiple air pollutants in the city. This work will then inform a new Air Quality Action Plan in 2026, following the public consultation which took place at the end of 2025.

Land Quality: other specific context

Oxfordshire County Council Minerals and Waste Plan

2.14 Oxfordshire County Council has an adopted [Minerals and Waste Core Strategy](#) which sets out the over-arching county policy for minerals and waste in Oxfordshire to 2031.

Land Quality Strategy for Oxford (2020)

2.15 This City Council strategy seeks to ensure that Oxford’s residents and the natural environment are not exposed to unacceptable risks from land contamination and to improve our environment for a sustainable future. The strategy seeks to achieve this through working with developers, landowners and other key stakeholders to manage risks from land contamination effectively and efficiently. The first objective of the strategy is “To deal with contamination through development control and building control wherever

possible”. In order to achieve this, the strategy sets out that it seeks to “ensure that land contamination is taken into account when developing planning policy documents”.

Water Quality: other specific context

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

2.16 These [regulations](#) aim to improve and integrate the way water bodies are managed in England and Wales. They require England and Wales to reach good chemical and ecological status in inland and coastal waters by 2027.

Thames River Basin District Management Plan, Environment Agency 2022

2.17 River Basin Management Plans provide a framework for the protection and enhancement of water environments at a river basin scale, as part of implementing the Water Framework Directive.

2.18 The [Thames River Basin District Management Plan](#) (updated 2022) covers a wide area including Oxford, and it identifies a number of significant water management issues impacting upon the river basin as a whole, (though not necessarily reflective of Oxford specifically) including issues relating to physical modifications to water bodies; pollution from waste water; pollution from towns, cities and transport; changes to the natural flow and level of water; negative effects of invasive non-native species; and pollution from rural areas.

Thames Water’s Water Resources Management Plan 2024

2.19 Thames Water recently published its updated [Water Resources Management Plan](#) (WRMP) which sets out how the company will provide a secure and sustainable supply of water to their customers, whilst protecting the environment, over the next 75 years. WRMPs are important strategic plans that set out the preferred programme for managing water resources in the Thames Water supply area. The plan sets out forecasts of supply and demand, including the expected shortfalls in the future due to pressures such as climate change and population growth. It also sets out a programme of planned interventions to ensure that water resources within the Thames Water area are appropriately managed, including demand reduction measures like addressing leaks, and larger more strategic measures including water transfers and a new reservoir in the Abingdon area.

Thames Water's Drainage and Wastewater Management Plan

2.20 [Thames Water's Drainage and Wastewater Management Plan](#) (DWMP) addresses future pressures on our wastewater service and sets out their approach and the investment needed to deliver a sustainable service that manages wastewater for the area and protects the environment. The DWMP covers a 25 year period and was published in May 2023.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Air quality

3.1 The City Council declared an Air Quality Management Area (AQMA) for Nitrogen Dioxide (NO₂) in central Oxford in 2003, which was expanded in 2005. Despite good progress being made as part of the responses enacted to address these designations, significant breaches of the national objectives for NO₂ still existed and additional hotspots were identified. Following further detailed assessments of air quality, a city-wide AQMA was declared in September 2010. In 2021 the Council published its Air Quality Action Plan (AQAP) prepared to address poor air quality in the city covers the period from 2021-2025 and includes an ambitious headline target to “achieve a local mean NO₂ target of 30µg/m³ by 2025”.

3.2 Air pollution can have a variety of causes including tail pipe emissions from transport, the wearing of tyre and brake pads, as well as emissions from heating sources within buildings (e.g. gas boilers). The pollutants are comprised of various substances including nitrogen dioxide, ozone, and particulate matter (small particles of solids like soot and dust). The latest [Air Quality Annual Status Report](#) (published June 2025 and reporting on 2024 observations) indicates that the transport sector continues to be the largest contributor (44%) to total emissions of Nitrogen Oxides (NO + NO₂) in the city, followed by combustion from industry and services (30%), domestic combustion (26%), and others: waste, agriculture, solvents, nature (<1%).

3.3 The Council's [annual air quality status report](#) (published June 2025 and reporting on 2024 observations) indicates the following in terms of current situation:

- Air pollution levels have significantly improved in the city of Oxford over the last few years since the launch of the Air Quality Action Plan (AQAP) 2021-2025. Nitrogen Dioxide (NO₂) is the pollutant of greatest concern in Oxford, it is

emitted from high-temperature combustion processes and is generally concentrated around busy roads due to its short lifetime. Across the city, it is estimated to have decreased on average by 10% in 2024 compared to 2023. Despite this, there are still air quality challenges to address.

- Only one of the 118 sites that the city monitors for NO₂ levels were in breach of the UK's legal annual mean limit value for this pollutant: Headington Hill (TF19), though this is not an area of primary concern (i.e. where members of the public are likely to be regularly present for a period of time).
- Only four of the 118 sites were in breach of Oxford's local annual mean target for NO₂ (30 µg/m³) – this target is the city's local commitment laid out in the city's AQAP, and which is expected to be achieved across the city by 2025. Those locations are St Clements (DT55), Headington Hill (TF19), and Oxford's ring road (TF31 and TF36).
- The reduction in NO₂ levels are likely linked with reductions in transport levels in the city seen recently, which are also expected to have been influenced by the closure of the Botley Road in April 2023 for improvements to the railway station, as well as the influence of the Zero Emission Zone. Annual mean for particulate matter (PM_{2.5} and PM₁₀) levels is measured in fewer locations than NO₂ (at AURN St Ebbes, representing urban background and Oxford High Street, representing roadside). For PM_{2.5}, annual mean levels recorded at the city's two monitoring locations were of 6 and 7 µg/m³ respectively. These are below the current UK legal annual mean limit of this pollutant (10 µg/m³) but slightly above the WHO recommended annual mean (5 µg/m³). Annual mean PM₁₀ levels were recorded as 9 and 13 µg/m³ respectively and have seen reductions of 0% and 7% at the city's monitoring sites compared with the levels measured at these sites in 2023. Values are well within compliance with the UK's annual mean limit value of 40 µg/m³, and just below the 15 µg/m³ guideline value recommended by WHO for this pollutant.
- Ozone is measured at one site in Oxford and levels exceeded the legal air quality objectives for this pollutant 114 times, during a total of 15 days in 2024, compared with 113 times over a total of 15 days during 2023. Therefore, AURN St. Ebbes has not met the AQ objectives for this pollutant in 2024. These breaches were likely caused by periods of warmer weather, linked with south-eastern winds coming from Europe, which brought pollutants that contributed to ozone formation.
- The report also details various positive steps that have happened over the last year with regard to addressing transport emissions. For example, the County

secured £3.6 million funding from the Department of Transport to triple its public EV chargers; the City and County held Air Quality Action Plan workshops; and the City and Canal & River Trust launched 'eco-moorings' for the first time along the Aristotle Canal for charging e-boats.

3.4 Long-term exposure to air pollution has been linked to chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term increases in levels of air pollution are associated with a range of health impacts, including lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. It can be particularly detrimental for society's most vulnerable individuals including the children, the elderly, and those with long-term health conditions. Air quality was legally recognised as a contributing factor in the death of an individual in the UK for the first time in 2020. The issues of poor air quality affect everyone, but there are often inequalities in exposure towards those living in more deprived communities for reasons such as: living in poorer quality buildings; reduced access to open space and green infrastructure; proximity to busier main roads where pollution is worst.

3.5 Poor air quality can also have negative impacts on sensitive habitats, particularly near to sources of emissions like roads with deposits of substances like nitrogen altering the suitability of the environment for certain species and changing the makeup of the ecosystem over time. Previous iterations of Habitats Regulations Assessment (HRA) have flagged that air quality impacts are a particular sensitivity that risks the habitats and species of the Oxford Meadows Special Areas of Conservation (SAC). The HRA which has been published alongside the Regulation 19 Local Plan should be referred to for additional detail.

Land quality/soils

3.6 Oxford contains several wedges of agricultural land. The best and most versatile agricultural land (Grades 1, 2, and 3a) is considered to be a national resource and should not be lost. Most of the agricultural land in Oxford is not of this quality, however, there are some parcels of Grade 2 agricultural land north of Binsey and in the Cherwell Valley.

3.7 Oxford has seen significant industrial change to the present day in fact Oxford's industrial history has resulted in a substantial amount of land affected by contamination. Almost all of the former major industrial sites have now been remediated and redeveloped, such as Lucy's in Jericho and the former car factory site in Cowley. However, there remain a number of smaller sites that have the potential to be affected by contamination.

3.8 In 1989, Oxford City Council commissioned a review of former landfill sites in the city. It was a comprehensive review that allowed the city council to manage the risks associated with those sites. A review of council-owned allotment sites was also carried out in the 1990s following some concerns about the quality of the land for growing produce. Since then, some council-owned land, such as former depots, has been redeveloped for housing and the necessary site investigations and remediation has been secured through the planning process.

3.9 Oxford City Council maintains a public Contaminated Land Register in accordance with the relevant legislation. There are currently no entries on the Contaminated Land Register. It is worth noting that the register does not include the details of sites that have been remediated through the planning process. There is the possibility that contaminated sites which have not been identified remain and thus could be added to the register in the future.

3.10 Oxford also has a number of peat-rich soil deposits which are located in several locations across the city. Peat rich soils are particularly valuable natural features which not only act as important storage for carbon (carbon sinks) but are also important for managing/storing water and also for retaining archaeological deposits. Historic British Geological Survey/Natural England mapping has these identified at Dunstan Park, around the Churchill Hospital and Lye Valley, as well as along Littlemore Brook in the south of the city. Engagement with Natural England officers previously suggests that this mapping was only approximate and that a future project is likely to result in refinements to this mapping (discussed further in Section 5). Indeed, the Council is aware of the potential for deposits more widely in the city despite historic development having likely removed much of what was once present.

Water resources/water quality

3.11 The Council has produced a separate Water Cycle Scoping Study which should be referred to for a detailed assessment of water conditions in the city. This follows best practice for preparing such studies as set out by the Environment Agency. The following is a summary of the situation in relation to water resources (supply and quality).

3.12 In terms of water supply, the city remains in an area of serious water stress as identified by the EA and this is the basis for the more stringent water use limits imposed by Building Regs which the Local Plan 2036 requires of new development. Thames Water are responsible for water supply for the city and their Water Resources Management Plan (see earlier in this background paper) notes several key challenges facing the management of the water supply for the region in the future: a growing population, climate change and the

need to protect the environment. By 2050, without taking action, the plan projects a water supply shortfall for the region of 1060 million litres per day, which increases to 1100 million litres per day by 2075. In order to tackle the shortfall, the plan proposes a variety of measures including leakage reduction, smart meter installation, free water efficiency measures and advice for customers, as well as new water supply schemes.

3.13 Water quality issues are ongoing in the city, with the majority of watercourses either classified as moderate or poor in ecological status for a variety of reasons. Oxford is located within the Thames River Basin District which is covered by the [Thames River Basin Management Plan](#) (TRBMP) which was last updated by the Environment Agency in 2022. As part of this update, revised condition assessments are available showing the variety of reasons for the condition of water quality in waterbodies, in particular:

- Agricultural practices (poor nutrient management)
- Sewage discharge
- Invasive species
- Urbanisation
- Global pollutants (uPBTs) - causing all waterbodies across country to currently be classed as fail for chemical status

3.14 Some of these stressors are not within the Local Plan's influence, for example, pollution arising from agricultural practices within the catchment, as well as the influx of invasive species into watercourse or the chemical contamination arising from global pollutants. Others are more within the influence of planning policies that guide the quality of new development, for example the treatment of urban run-off arising from urbanisation, as well as the pressures on wastewater infrastructure leading to sewage discharges (though this is partial in relation to new development, as there is already a significant proportion of existing development that new planning policies are not able to influence).

3.15 There are known capacity concerns in relation to wastewater infrastructure in the city and upgrades are required to the Wastewater Treatment works which services the city to address current capacity problems and future needs. On 20 March 2025, following a rigorous process to find a solution to the existing concerns, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford Sewage Treatment Works, this will help provide the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward. Separately, [Thames Water's Drainage and Wastewater Management Plan](#) (covering the period 2025 to 2050), proposes various measures to address targets for addressing known issues with the wastewater and drainage systems across their region which will include

Oxford. The Council has been engaging with representatives of Thames Water and the EA during preparation of the Local Plan 2040 and continues to do so on throughout the preparation of the new Local Plan 2045.

3.16 Groundwater is another important element of the city's water environment and the Environment Agency includes various pieces of [guidance](#) in relation to its protection. The quality of groundwater and the way it flows below the ground can be particularly important for maintaining the healthy functioning of various sensitive ecological sites around the city, including the Oxford Meadows SAC and SSSIs such as the Lye Valley. New development coming forward in particular areas needs to ensure that risks of introducing pollutants into groundwater are mitigated sufficiently but also that subterranean development, such as introduction of basements, does not interrupt water flows.

3.17 Climate change is likely to put additional pressures on the water environment in future. Drier, warmer summers could put pressure on water supply and the quality of waterbodies in the city, as well as impacting the more sensitive habitats that rely on a certain hydrological profile to support species that exist there. Equally, more intense rainfall events could put additional pressures on wastewater systems and result in additional releases of pollutants into waterbodies without appropriate mitigation measures in place.

Other impacts on the environment

3.18 The development process can have other impacts on the environment and people's health unless sufficient mitigations are put in place. In denser urban areas, sources of different types of amenity impact and pollution can be more common and their impacts increased. For example,

- Impacts of noise pollution arising from construction processes as well as when a development is in operation and from other sources such as traffic can have a variety of health impacts such as sleep disturbance, impairing concentration and causing stress in people whilst also disturbing wildlife.
- Impacts of dust released arising from during construction processes like demolition and processing materials can exacerbate air pollution
- Impacts from odour, including where development arises in proximity to particular odour sources such as sewage treatment works or industrial uses.
- Excessive artificial lighting can impair natural functions of wildlife such as birds and insects.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 The policies of the adopted Local Plan 2036 would continue to apply. There would also be national policy which affords various protections and requirements for addressing issues of pollution/contamination of air, land and water. This would be supported by the range of other associated environmental legislation, including what was touched upon in the policy context section.

4.2 Whilst air pollution arises from various sources, it is predominantly transport-related emissions (particularly fossil fuel burning engines) which is responsible for the bulk of pollutants in Oxford. The Local Plan has limited influence on transport emissions as the Council is not the highways authority. However, there are a number of schemes proposed for Oxford through the [Local Transport and Connectivity Plan](#) (LTCP) and the [Central Oxfordshire Travel Plan](#) (COTP) which, in combination, should improve air quality by reducing emissions associated with transport. These include: traffic filters, low traffic neighbourhoods (LTNs), and the zero-emission zone (ZEZ). These are likely to bring benefits even without a new local plan as they are being driven via different work-programmes and funding. The Transport background paper 012 explains these programmes in more detail.

4.3 Nationally, transport-related emissions are expected to continue to reduce as transport shifts towards electric vehicles with the phasing out of new petrol/diesel engines (previously this was delayed to 2035, although the current government have pledged to bring this date forward to 2030). Indeed, Oxford is already shifting public transport to electric modes, with the recent delivery of [159 electric buses which will help to shift 69% of the total bus mileage operating in the city to electric](#). There are likely to remain air quality impacts from brakes/tyres, however, small improvements could also occur in this regard as technologies improve.

4.4 Government proposals to phase out gas boilers in domestic heating, alongside tighter Building Regulations and general improvements in the efficiency of these systems, are also likely to bring improvements in relation to domestic sources of air pollutants in the absence of a new Local Plan, at least for new buildings. The effect of these improvements in reducing the sources of emissions from existing buildings will likely take more time as the retro-fitting of existing stock is a significant challenge. These issues are explored more in the Background paper 008 Carbon Reduction and Climate Resilient Design.

4.5 In terms of efficient use of land, development pressures will continue in the city regardless of a new Local Plan, with high demand for land for housing and commercial

uses in particular; pressure for higher density development; and a continued reliance on previously developed land (which also now has greater emphasis in the 2024 NPPF updates). The absence of an up-to-date Local Plan could potentially increase the pressure for development on greenfield sites within the city boundary, including open spaces which could be used for agricultural land. This could have subsequent implications for degrading soils if unmitigated, including areas of more carbon-rich peat reserves which have not already been lost, as well as the potential to have an adverse impact on the amenity of residents and visitors to the city. With use of previously-developed land, there is also likely to be a continued need to address issues of contaminated land including appropriate remediation where necessary to ensure that people do not come into contact with harmful pollutants.

4.6 In terms of water resources, Oxford is already in an area of water stress, and climate change may exacerbate this. Increased development and associated population growth will also put more pressure on water resources without appropriate mitigations. Thames Water has various plans in place to address water supply and wastewater treatment which will likely have benefits for Oxford. To be most effective, these will also need to be combined with appropriate water efficiency measures in homes and businesses, which a new Local Plan could help to implement for new developments only (not for retrofitting) as is the case with the extant Local Plan 2036. A new Local Plan would also provide infrastructure providers like Thames Water with the best certainty over the location, scale, and type of future development expected to come forward in the city allowing them to better plan for future needs.

4.7 In relation to water quality, Local Plans have varying levels of influence over the different factors negatively impacting the quality of the water environment in the city. Without a new Local Plan, problems associated with urbanisation and sewage discharge could be exacerbated as the current Local Plan policies grow out of date, meanwhile impacts of pollution relating to agriculture, or invasive species in the environment are likely to persist without other types of interventions outside of planning. There are various infrastructure upgrades and improvements that will need to be carried out by Thames Water in order to address existing capacity concerns and meet demands for the future, which will support improvements to the water environment by addressing problems of sewage discharges. Again, having an up-to-date Local Plan can help ensure that there is a clear picture of how future development will come forward in order to help inform those upgrades. Whilst the current Local Plan sets policies that help to mitigate water quality impacts from new development (e.g. SUDs policies), a new Local Plan will help to ensure the right policies are in place up to 2045 in order to mitigate impacts of future growth and complement the upgrades to infrastructure that also need to be put in place.

5. Key issues addressed through the Local Plan

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to impacts on natural resources. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

5.3 The new Local Plan continues the approach of the Local Plan 2036 in addressing different elements of natural resources and environmental quality across a number of policies. Overarching across all the topics discussed in this paper is policy R8 Amenity and Environmental Health impacts of development which covers a wide range of issues that can arise during the construction and operational phases of development. The policy sets out various impacts a development may need to mitigate including various types of pollution such as noise and vibration, light, as well as impacts of odour. This is supported by requirements for construction management plans as set out in policy C6. The Local Plan then also includes several bespoke policies which address particular issues that need more nuanced responses.

Air

5.4 Policy R4 sets out requirements in relation to air quality including requirements for Air Quality Assessments on major developments as well as general requirements with regard to designing to mitigate impacts of poor air quality, particularly on sensitive receptors. Air quality limits of new development are expected to fall in line with the local target for Nitrogen Dioxide (NO₂) as set within the Council's Air Quality Action Plan, this is intended to ensure that the standards of development are aligned with the wider strategy for addressing poor air quality in the city. With the shift towards electric vehicles and electric forms of heating in buildings (as opposed to burning fossil fuels), it is expected that accordance with this target should become increasingly manageable over time.

5.5 Additional policy requirements set out elsewhere in the Local Plan, including those related to net zero carbon buildings (Policy R1) which restrict burning of fossil fuels in new development, as well as policies promoting walking/cycling/wheeling in Chapter 7 will also support air quality.

Water

5.6 The Local Plan 2045 includes a new water focussed policy—Policy R5—which addresses both the use of water (water resources) and protection of the water environment in the city (water quality). This is an important policy which responds to various pressures on water in and around the city and requires applicable proposals to submit a water awareness statement as part of their application setting out how the policy’s requirements have been met.

5.7 The policy sets requirements that seek to promote prudent use of water including the tighter water use restriction of Building Regulations, as well as more general water saving/efficiency measures. This is important for seeking to mitigate impacts on water resources, which we know from the Council’s Water Cycle Study are under pressure now and increasingly so in future due to factors like increased demand from population growth and hotter, drier summers due to climate change.

5.8 Additionally, the policy seeks to protect the water environment from the impacts of new development, seeking to ensure that proposals demonstrate that development will not have an adverse impact on the quality of controlled water bodies and groundwater. The policy works in tandem with a range of policy requirements across the Local Plan, such as:

- Policy G2 encouraging buffers along watercourses which seek to protect and enhance these areas where development happens adjacent to them.
- Policy G6 setting out the protection and mitigations required where development could potentially have an impact on ecological sites including those that are particularly sensitive to impacts on water quality (and/or flows of surface/groundwater and groundwater recharge).
- Policy G8 setting out requirements for multi-functional green Sustainable Drainage Systems (SuDS) which are important for helping to filter contaminants of surface water run off.

Land and soils

5.9 There are two policies in chapter 5 which deal with land and soils, policies R6 and R7. Policy R7 addresses the potential for presence of land contamination. This policy is largely unchanged from the currently adopted policy within the Local Plan 2036, with minor revisions including reference to sustainable remediation practices. It seeks to ensure applications are accompanied by appropriate investigation of land contamination where it could be present and that remediation efforts are put in place where necessary to ensure it is made safe.

5.10 Another new policy for the Local Plan, first proposed as part of the withdrawn Local Plan 2040, is Policy R6 which addresses soils and peat reserves. The purpose of these requirements are to help mitigate impacts on soils, which are a resource which takes a very long time to replenish, but one that can be impacted in various ways through development (e.g. compaction from heavy equipment during construction, sealing off by overuse of artificial surfaces etc). General requirements are included which encourage more sustainable use of soils, and whilst these will be more relevant on greenfield sites, it is important that they are considered in any development which affects soil where this could be a risk as these are important resources.

5.11 Additionally, the policy also includes requirements for preserving remaining peat reserves in the city, of which there are several recorded reserves in Oxford. Previous engagement with Natural England on mapping of peat across the UK has identified that existing mapping can be patchy and subject to some uncertainty. Indeed, the new national peat map published by Natural England in 2025 does not appear to currently identify any of the previously recorded deposits in the city on Natural England's old mapping or that appear on British Geological Survey records, although the guidance associated with this new mapping indicates it is subject to some uncertainties based on how deposits have been modelled. As such, the historic mapping has been utilised as the basis of the policies map layer as the Council is fairly confident that this acts as a good indicator for significant existing deposits in the city based on existing knowledge of ground conditions in the city.

5.12 To accommodate for uncertainties in existing mapping, the policy also includes a requirement for investigations within 200m of the previously recorded reserves identified on the policies map if proposing development on undeveloped land. This requirement is considered to be a pragmatic solution so that the development process is informed by a sound understanding of below ground conditions in areas with a higher likelihood of deposits being found. It will also help to ensure that the Council is provided with sufficient information to make a determination about impact of proposals on other peat deposits in the city when applications come forward.

Appendix A – Regulation 18 Policy options sets

Policy options set 009a (draft policy R4): Air quality assessments and standards

Whilst air quality is improving in the city, it is important that new development is designed with appropriate consideration for existing pollutant exposure in area, potential impacts on users of the development (including sensitive users), and also the potential for the new development to exacerbate existing issues. Whilst the key pollutant of concern in the city to date has been Nitrogen Dioxide, there are a range of other pollutants which have impacts on people's health that need to be considered, including particulate matter. These various pollutants can have a range of sources including transport, boilers, manufacturing and construction processes. The city's Air Quality Action Plan (currently being updated), includes local targets for air quality that are more stringent than national targets and it is important that new development is aligned with this.

The policy options set out include requirements for undertaking air quality assessments and demonstrating that proposals have considered the range of pollutant sources during operation but also construction and that any significant impacts on air quality are mitigated. There is also an option for requiring new development to align with the city's locally set air quality targets as outlined in the latest Air Quality Action Plan. There is also an alternative option of having no locally set policy on air quality.

Table 1: Policy options set 009a: Air quality assessments and standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require Air Quality Assessments (AQAs) for all major developments, and any other development considered to have a potentially significant impact on air quality. The AQA must consider all the different sources of air pollution during operational and construction phases (including but not	Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality across Oxford is key to safeguarding public health and the environment. The whole of the city was declared an AQMA in September 2010. A policy in the Oxford Local Plan can influence and seek improvements in air quality at both a local and strategic level. For example, the	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

limited to: transport, heating, dust generated from construction activities, etc). Any resultant significant impacts on air quality inside an AQMA must be mitigated.	encouragement of active travel options reduces dependence upon use of private cars, the majority of which are currently non-electric vehicles (EVs). The Air Quality Action Plan (AQAP) has been produced as part of the City Council's statutory duties and it outlines actions to be taken to improve air quality in Oxford 2021-2025. Key objective is to bring NO2 emissions into legal compliance as soon as possible and to go beyond legal compliance.	
Option b Require all new major developments within the city's AQMA to comply with the locally-set, more stringent, air quality standard for Nitrogen Dioxide (NO2) set out in the city's latest air quality action plan (AQAP) (currently a target of 30µg/m3) as well as compliance with current national air quality objectives (unless superseded by local standards).	This target would set an ambitious standard for accepted Nitrogen Dioxide emissions from all new development in recognition of the rigorous target the City Council has set locally within its Air Quality Action Plan (AQAP). The standard would potentially become more challenging if the AQAP is updated with tighter standards in future. The target is currently 10ug/m3 lower than the UK's current annual mean limit value for this pollutant.	A more stringent target will set a higher standard for new development in the city which could be considered more onerous for applicants. This is an additional standard to the requirements that developments currently follow in the current local plan.
Option c Do not include a policy about air quality assessments but rely on other regulatory regimes.	None identified	This option is not considered to be reasonable due to the poor air quality across the city, and the whole city already covered by an AQMA. Relying upon national legislation ignores the Oxford context and the city's ambition to go beyond national targets.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? a or b or a+b, or c

High-level screening conclusion? - the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: These options are about whether to set local policies about air quality (options a and b) or to rely on national policy and regulatory regimes (option c). The whole of Oxford is covered by an Air Quality Management Area (AQMA) so air quality is a sustainability issue of particular relevance to Oxford. Historically there have additionally been air quality ‘hotspot’ areas identified, where pollutant levels were of even greater concern than the rest of the city, although in recent years the levels at the majority of these hotspots have now reduced significantly as a result of various measures to improve air quality (as set out in the Oxford Air Quality Action Plan), such that they no longer warrant bespoke policy measures for those areas. The AQAP sets more stringent targets for air quality than national targets, and as the monitoring in the AQAP report sets out, those more ambitious targets are being met in recent years, so it would be a reasonable approach for LP2042 to continue to set ambitious targets to tackle the issue of air quality.

In terms of sustainability impacts, options a and b could potentially help to meet **criterion 8 reduce traffic and associated air pollution**, because although the options aren't about traffic, they encourage consideration of air pollution and as emissions from transport are one of the biggest contributors in Oxford then any AQA would need to consider the operational impacts which would include transport (as well as other sources of air pollutants). This is partly however subject to implementation. Option b is likely to have the greatest positive impact because that sets stringent targets whereas option a only requires consideration of air quality but does not set targets. Option c would be neutral because it does not go beyond the national policy baseline and sets no targets, however emissions from transport are likely to continue to reduce under this scenario as the national transition away from fossil fuel transport and heating sources continues. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Air quality assessments and standards – Draft policy R4

The preferred approach for the Local Plan policy is to have a local policy that addresses air quality so as to ensure that impacts on health, particularly for the most sensitive groups, are fully considered and that progress on improving the city's air quality continues. This recognises that this issue is an important one locally, as well as a particular objective to be addressed by the new Local Plan, and responds to the ongoing AQMA designation which covers the entire city.

This means a combination of **options A and B**, with option A helping to ensure that new development fully considers the issues of relevance in relation to existing air quality issues in the area, but also how a proposal could be impacted by this or could impact upon it via submission of an Air Quality Assessment. Option B will also help to ensure that new development is designed in a way that is aligned with the city's local objectives for addressing air quality, including aligning with the local air

quality targets which are tighter than national targets in relation to Nitrogen Dioxide (for which past exceedances are the reason for which the city's AQMA designation is in place).

Policy options set 009b (draft policy R5): Water quality and resources

The city is subject to various issues impacting the water environment. Oxford is in an area of water stress and this stress is likely to increase due to climate change, meaning that it is imperative that new development uses water prudently and minimises waste. Equally, watercourses around the city are subject to pollution from various sources which impact on their ecological status, some of which is associated with the development process (e.g. urbanisation increasing pollutant run off; pressures on wastewater systems leading to sewage discharges). Whilst the Local Plan cannot fully protect or mitigate all of the ongoing challenges facing the water environment (which is subject to actions carried out by stakeholders across the wider catchment), it can help to ensure that the impacts from new development are fully considered and appropriately mitigated.

Various design choices can help to address pressures on the water environment, from the way services and water fittings are implemented within buildings, to the way that green infrastructure and sustainable drainage systems are incorporated in areas around buildings. As such, one option would be to ensure that considerations affecting water are spread throughout relevant policies of the Local Plan to ensure a wholistic approach to assessing new development. Alternatively, because issues impacting the water environment are so pronounced, and subject to increasing concern, it may be more appropriate to include a bespoke policy addressing these requirements, though there may be some repetition/crossover with other policy areas. The options also include requirements for separating foul and surface water in when designing drainage for new sites, to reduce pressure on the sewage system.

Table 2: Policy options set 009b: Water quality and resources

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a bespoke policy on water resources and water quality. This would include various requirements such as	Ensures that water quality is addressed separately in any development. Having a bespoke policy is a clearer way of presenting the various requirements for water use and water quality for applicants and also decision	This could result in unnecessary repetition in the Local Plan and additional information being prepared for a proposal that would have already been undertaken as part of the SuDs design, and would have already been considered in assessing any potential impacts of the proposal on water quality.

requiring measures to limit water use and conserve water, including meeting the tighter Building Regs water use limits. Also, measures to mitigate impacts on water quality, such as use of Sustainable Drainage Systems (SuDs).	makers, and transparently demonstrating compliance with Water Framework Directive requirements.	
Option b Do not have a bespoke policy but instead incorporate water resources/ quality considerations into other policies about managing the impacts of development.	This approach ensures that water quality is addressed through approaches such as: ensuring water use is limited to certain standards in new development through resilient design and construction; the use of <u>SUDs</u> in development; and the provision of evidence in any planning application submitted which demonstrates that there would not be a negative impact on water quality.	Previous feedback on the Local Plan 2040 from the Environment Agency flagged concerns about this approach including that there was potential for it to result in elements of water quality being overlooked. It is also potentially a more complicated way of presenting the policy position rather than having a bespoke policy.
Option c Expect that foul water is separated from surface water drainage on development sites. Require a Foul and Surface Water Drainage Strategy for all new build residential development and non-residential development above a certain threshold.	Would ensure that appropriate consideration is given to foul water drainage and how this is handled on site regarding sewer system. Would ensure that design of foul water drainage is appropriately informed by strategy on larger developments.	Additional requirements placed upon developers in order to achieve planning permission.

Option d Do not include any policy direction about water quality but rely on other regulatory regimes and national policy.	The NPPF includes high level guidance about water quality and drainage (paragraph 182).	Would not address Environment Agency concerns raised at LP2040.

Initial sustainability appraisal screening of options sets		
Is there only one option or are there various options we could take? Option a or b or d (they are alternatives) or combination with option c		
High-level screening conclusion? the options are similar to each other from a sustainability perspective		
Screened in for detailed appraisal? - No		
Rationale: These options are about whether to set local policy requirements about water quality (options a or b) or to rely on national policy and regulatory regimes (option d). Option c would require additional information to be submitted in relation to foul and surface water drainage which is important for reducing impacts on sewer network. Options a, b and c would score positively for criterion 9 water quality targets, but option a would set out the requirements in a single policy whereas in option b the issue of water quality would be woven into other relevant policies through the plan (the requirements themselves are not expected to differ, the choice is principally in how they are presented). Option d will be neutral in some respects because there are regulatory regimes that should prevent deterioration of water quality in various ways, alongside Thames Water’s own responsibilities for addressing this challenge, however, there could potentially be some negative impacts where national standards are not considered enough, particularly in light of known challenges with water quality in the city and this makes this option unlikely to be reasonable to take forward. Overall, it is considered that the sustainability impacts from the options do not differ significantly enough to warrant them being scoped in for further detailed appraisal.		

Water quality and resources – Draft policy R5

6.7 Again, the preferred approach for the Local Plan policy is to have a local policy that addresses the issues of water resources and water quality. Whilst the local plan will not be able to fully address the various stressors on the water environment which arise from various sources such as climate change, pollution from land use management like some agricultural practices, as well as the actions of stakeholders beyond the city, it can still help to ensure the impacts from new

development are appropriately considered and mitigated. Previous feedback on the Local Plan 2040, which proposed addressing water issues across various policies instead of one policy, suggested that stakeholders such as the Environment Agency wanted to see a bespoke policy which would provide more clarity and better signpost this as a key issue facing the city.

6.8 As such, the preferred approach is a combination of **Options A and C**. **Option A** will mean setting out a policy with various requirements for how development should address conserving water, including that they follow the optional tighter standard for water use limits, as well as incorporating other water saving measures. It also means including requirements for how water quality should be preserved, which would have overlap with other policies in the plan such as use of sustainable drainage measures. The preferred approach would also include **option C** which is to ask applicants to ensure foul water is separated from surface water in drainage systems, which can help reduce the strain on wastewater systems, and, on larger developments, go further and ensure their application is supported by a foul and surface water drainage strategy which can fully set out how these issues have been considered.

Policy options set 009c (draft policy R6): Soil quality

Earlier sections of the background paper identify that construction practices and inappropriate design of new development can have harmful impacts for soils, of which Oxford has varying quality. Soils are important for providing a range of benefits, from supporting green infrastructure and habitats, to flood storage and locking up carbon. In particular, Oxford has several areas of particularly valuable peat deposits, which are especially important carbon sinks as well as sources of archaeological deposits. Whilst existing mapping identifies several recorded deposits, there is potential for additional areas of deposits in undeveloped land nearby which have not been officially recorded.

The options set includes an option for setting out requirements to ensure new development considers its impact on soils, regardless of their quality, and seeks to adapt design and construction practices to help ensure sustainable management of soils and mitigate harmful impacts. In addition, there is an option for having additional requirements in relation to protecting peat reserves because of their particular range of benefits they provide, which would focus on the known peat deposits, but could also incorporate requirements for investigating and addressing potential undiscovered deposits nearby.

Table 3: Policy options set 009c: Soil quality

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out requirements/principles for conserving and enhancing soils.	Construction practices, including use of heavy machinery, below ground construction and reworking of soil layers can have detrimental impacts on long-term health of soils. Incorporating standards within policy to guide design and construction would help to ensure the least impactful practices are followed wherever possible to avoid and mitigate impacts. Preserving soil health could help to secure multiple benefits in the long term, including for biodiversity, flood risk (improved flood storage) and climate change (healthier soils can better lock up carbon).	Different sites and types of proposed development will result in a variety of considerations and different solutions that will be needed. Unlikely to be a one-size-fits-all solution that a policy could guide applicants towards. Asking applicants to tailor construction processes to avoiding impacting soil quality e.g. through avoiding loss, erosion, compacting soils with heavy machinery is likely to impose additional challenges for design and construction and potentially incur additional cost and resource.
Option b Set out additional standards for the protection of peat reserves including no loss/dewatering of these reserves.	This approach would help to ensure that some of the most valuable types of substrate, not only for locking up carbon, but also archaeological remains, are preserved where they still remain. This is particularly important as peat deposits take a significant period of time to develop. The most pragmatic approach would be to focus this policy requirement on the known areas of recorded peat deposits in the city according to public mapping from Natural England with a precautionary buffer area, whilst treating the surrounding areas with an element of caution, focusing requirements for additional investigation only to proposals on undeveloped sites in the vicinity.	Known, publicly accessible mapping of peat reserves that applicants could rely upon is potentially patchy. Whilst it seems most appropriate to focus requirements for additional investigation to areas within or around recorded deposits, the approach could potentially miss out on unknown deposits located more widely across the city. Requirements for additional investigations within the buffer zones to known reserves will incur additional cost and resource from applicants, though this could be reduced by focusing on undeveloped land where potential for underlying peat is potentially higher.
Option c	None identified	National policy is fairly limited in guidance for conserving soils and peat so a lack of local policy may

No additional policy for addressing soil quality or protection of peat.		lead to further deterioration and loss of peat (which is effectively irreplaceable).

Initial sustainability appraisal screening of options sets		
Is there only one option or are there various options we could take? - either option A, B, A+B, or C High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: The options represent varying levels of protection that local plan policy could provide for soils, with option a setting out general requirement and guidance, and option b setting out additional protections for peat reserves (which could theoretically be standalone or in combination with option a). Option c would mean setting no local policy. The sustainability impacts relate most directly to SA criterion 3. Efficient Use of Land with option a and b representing minor significant impacts for protecting soils. Admittedly, the additional protections for peat could have negative impacts for the same criterion at the site scale in a select number of locations in the city where development capacities of sites in proximity to peat reserves could be limited by their additional protection (although these circumstances are expected to be quite limited). Option b would also represent an additional indirect positive impact for criterion 1. Carbon Emissions because it would help to ensure that the most carbon-rich reserves recorded in the city (peat reserves are typically significant carbon sinks) would be protected from further loss arising from the development process – although these resources are not factored into the city’s specific net zero target roadmap. Option c is likely to be a minor negative impact for criterion 3. in relation to soil quality because there is little specific guidance in national policy alone that development would need to follow, thus without local guidance development has a far greater likelihood of coming forward in ways that degrade soils. The same is likely true for criterion 1. although the impact of option c may be closer to neutral in this regard as peat reserves in the city do tend to occur near to waterbodies or within areas of green space that mean they may benefit from additional protections that could mitigate some of the harm, although these are not specific to conserving below ground deposits like peat. Overall, the sustainability impacts are unlikely to be significant or to differ much between the options and screening in for detailed appraisal is not considered necessary.		

Soil quality – Draft policy R6

6.11 To ensure impacts on soils are fully considered and opportunities for sustainable soil measures incorporated, the preferred approach is to follow **Option A and B** and include a local policy on soil quality. **Option A** will allow the Council to set

out various principles which applicants will need to follow, depending on the context of the site. This should help to ensure that future development mitigates impacts on soils as much as possible and ensure the issue of soil quality has greater prominence than in the current Local Plan.

6.12 In addition, **Option B** would help to respond to concerns flagged about the Local Plan needing to protect remaining peat reserves in the city as part of the previous Local Plan 2040 preparation and would recognise the particularly important role these deposits serve as carbon sinks and sources of archaeology which will be hard to replace if lost. It is acknowledged that mapping of peat reserves in the city is subject to some uncertainty, however, the focus on the recorded reserves according to publically accessible Natural England mapping would be bolstered by a buffer zone that seeks to ensure proposals nearby sufficiently investigate potential for peat on their sites and respond accordingly.

Policy options set 009d (draft policy R7): Contaminated land

Many of Oxford's past major industrial sites have been subject to remediation to address potential land contamination in the past, however, there is potential for additional contamination on smaller sites across the city due to Oxford's long history of settlement. Whilst national policy already sets various requirements for developers to address contamination, there is the option to set out specific local policy expectations for ensuring that potential contamination is investigated and appropriately mitigated, with the alternative option being not to include a local policy at all.

Table 4: Policy options set 009d: Contaminated land

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires the submission of details of investigations of any site suspected to be contaminated and details of remedial measures which must then be carried out.	This would be a continuation of the existing policy (currently set out in policy RE9). This approach ensures that there will be no threat to the health of future users or occupiers and no adverse environmental impacts.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

Option b Do not include a policy about land quality but rely on national planning policy and other regulatory regimes.	NPPF includes general policies about ground conditions and pollution and remediation.	This option is not considered to be optimal as the relatively large proportion of brownfield sites in Oxford means that there are more sites with potentially contaminated land than in other areas.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) High-level screening conclusion? - the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: The options presented are either to have a local policy that requires applicants to demonstrate they have sufficiently investigated potential for land contamination where relevant (and carried out sufficient remediation) or not to have a local policy. In terms of sustainability impacts, the options relate most directly to SA criterion 3. efficient use of land and would also indirectly impact upon 5. Inequalities (in relation to impacts on health). Option a would likely have a minor positive impact for criterion 3. in that it would allow for the efficient reuse of brownfield land through ensuring the previous contamination is investigated and remediated, ensuring this land can be brought back into use. It would have neutral or slight positive impacts for criterion 5. in that it would help ensure any harm to future occupiers' health is avoided, though the sites may not have been suitable for redevelopment at all without appropriate action to address any existing contamination too. Option B is likely to have a neutral impact across the criteria, as there is at least national policy guidance about addressing contamination, as well as other environmental quality legislation. The options are not considered to have significant sustainability impacts to warrant further detailed sustainability appraisal.

Contaminated land – Draft policy R7

6.14 Whilst national policy is already fairly strong on requirements for considering contaminated land, the preferred approach is to follow **Option A** and set out a local policy for addressing contaminated land. This would allow the Local Plan to clearly set out the specific local context of contamination in Oxford and provide applicants with a steer on the Council's expectations for how potentially contaminated sites are investigated and remediated.

Policy options set 009e (draft policy R8): Amenity and environmental health impacts of development

The constrained nature of the city means that development is often coming forward in close proximity to existing uses with various amenity implications where design has not considered this existing context. New development can have various impacts either as part of the construction process, or once in operation, particularly in relation to noise, dust and vibration, but also in other respects, such as glare, emission of pollutants and other forms of nuisance. These impacts can affect not only people but also the wider environment. Equally, the operation of existing uses nearby can impact upon users of a new development if a proposal is brought forward without due consideration. These existing uses may mean appropriate mitigation needs to be incorporated as part of the new development to ensure a reasonable and healthy environment for new occupants.

Some of these considerations, particularly those arising from the construction process and transport movements, will be factored into the production of construction management plans which would be required elsewhere in the Local Plan (discussed more in background paper 012/ draft policy C6). However, an option has also been considered for a broader amenity policy that could address these issues as a whole, alongside an option not to include a local policy.

Table 5: Policy options set 009e: Amenity and environmental health impacts of development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc. Continue to require that impacts of developments must be mitigated to ensure that the amenity of communities, occupiers	This approach ensures that any potential threat to the residents, future occupants and existing communities from the development are assessed and mitigated appropriately. This is not a prescriptive policy but one that ensures that the impacts of development are comprehensively considered and mitigated where applicable. This option should provide greater protection to the health and wellbeing of the population.	Additional assessment/modelling requirements for applicants which adds to the information they would need to submit with a planning application.

and residents are protected.		
Option b Do not include a policy but rely on national planning policy and other regulatory regimes.	Relying on regulatory regime would be familiar to developers and not unreasonable burden.	Regulatory regimes may provide the minimum standards of protection, however, having a local policy helps to ensure the impacts of development are properly considered and assessed in the local context of Oxford.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - either option a or b (they are alternatives) High-level screening conclusion? - the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: One option is to include local policy that sets standards for protecting amenity and environmental health from the impacts of new development, and the other is to not include a local policy. The nature of this policy option set is that it is likely to impact upon a range of SA criteria such as 8. traffic and associated air pollution, 9. Water Quality, and 5. Inequalities (the health element of this), due to the broad range of considerations it addresses. However, as it is focussed on ensuring mitigation to avoid negative impacts from new development this is likely to result in neutral impacts overall for these criteria. Option b would potentially therefore result in minor negatives for the same criteria, where development could come forward and cause amenity/environmental health consequences, however, this impact is mitigated by the presence of various other types of environmental health legislation and national requirements that could reduce these negatives, although it is less likely these would align with local objectives. Overall, the sustainability impacts of the options are not significant or different enough from each other to warrant further detailed appraisal.

Amenity and environmental health impacts of development – Draft policy R8

6.17 Again, the preferred approach for the Local Plan is following **Option A** to include a local policy on amenity and environmental health impacts of development. This recognises that the nature of the many constrained sites in the city means

that applicants need to consider a variety of impacts from their development on the surrounding area and vice versa and allows the Council to set out the key issues it wants to see applicants address.

6.18 The local policy can help ensure issues like noise, dust and vibration are considered as well as other impacts, to ensure that amenity for occupiers and neighbours as well as impacts on wider environment are sufficiently mitigated, although not all issues will be relevant to all applications. There is likely to be some crossover with other policies, such as the requirements for Construction Management Plans, however this policy would address broader issues like the impacts arising from the development once in operation too (not just the construction stages). Without a local policy, some of these considerations risk being missed, or not being sufficiently addressed upon submission of an application, potentially delaying the decision process.

Background paper 010

Title: Health and Wellbeing

This paper addresses: Regeneration, geographical spread of new development, accessibility of areas of deprivation, availability of green space in areas of deprivation and availability of essential services/facilities in areas of deprivation.
Relevant Local Plan Objectives: • Provide access to affordable, high-quality and suitable accommodation for all. • Curate a built environment that supports and enables people to be physically and mentally healthy.
SA Objective(s): 5. To reduce poverty, social exclusion, and health inequalities .
SEA theme(s): Human health, population, material assets.

1. Introduction	1
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	1
National Planning Policy Framework (Dec 2024)	1
National guidance documents	2
The Marmot Report and 2020 update	2
Marmot Places.....	3
Regional supporting strategies	3
Local Transport Connectivity Plan 2022-2050 (LTCP5).....	4
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	5
Levels of General health	6
Active Travel	8
Isolation and loneliness.....	9
Air Quality.....	10
Inequality and health outcomes	11
Health Deprivation	13
Employment Deprivation	14
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	15

What trends do data show?	15
Health and wellbeing in the context of the climate emergency	16
Considerations for the new Local Plan	16
5. Key Issues addressed through the Local Plan	18
Health Impact Assessments	18
Privacy, Daylight and Sunlight.....	19
Internal Space Standards for Residential Buildings	20
Outdoor Amenity Space	20
Appendix A - Policy options and preferred approaches	22
Policy options set 010a (Draft Policy HD10): Health Impact Assessments	23
Policy Options Set 010b (Draft Policy HD11: Privacy, Daylight and Sunlight).....	24
Policy options set 010c (Draft Policy HD12:) Internal Space Standards for Residential Buildings	27
Policy Options Set 010d (draft Policy HD13): Outdoor Amenity Space.....	30
Policy Options Set 010e (Draft Policy HD14): Accessible and Adaptable Homes	32

1. Introduction

- 1.1 The causes of poor health and wellbeing do not arise by chance and cannot be explained by genetics alone. It is now recognised that the built environment can have a significant impact on health and health inequality. The way that areas are designed and constructed can have a tangible impact on many of the wider determinants on health and wellbeing, such as peoples' activities, communities, economies and lifestyles.
- 1.2 Furthermore, health is not consistent across the population and stark inequalities often exist across population groups, even over small areas. Health and wellbeing are strongly correlated with levels of socio-economic deprivation, for example, with those living in the most deprived areas typically facing worse health inequalities compared to those living in less deprived areas.
- 1.3 As such, there are many indicators of health and wellbeing which can be influenced by planning. This paper highlights a range of physical and mental wellbeing indicators, which together begin to build a general overview of the health of Oxford's population.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

- 2.1 The **National Planning Policy Framework (NPPF)** updated in December 2024 is explicit in its support for healthy place shaping. It states in paragraph 96 that:

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

- 2.2 The NPPF further seeks to promote healthy lifestyles and wellbeing with requirements that have implications for placemaking, including restrictions on the location of hot food takeaways (paragraph 97), positive planning for the provision of shared spaces and community facilities, avoiding the unnecessary loss of such facilities, and ensuring an integrated approach to considering the location of housing, economic uses and community facilities (paragraph 98).

- 2.3 **Planning Practice Guidance (PPG)** sets out that plan-making bodies will need to discuss emerging strategies early with bodies such as NHS England and local clinical commissioning groups, while maintaining an awareness of the potential impacts of development on health infrastructure.

National guidance documents

- 2.4 **NHS England Long Term Plan (Jan 2019)** aims to ensure that the nation's future health is given high regard when planning and designing places. "*Wider action on prevention will help people stay healthy and also moderate demand on the NHS. Action by the NHS is a complement to – not a substitute for – the important role of individuals, communities, government, and businesses in shaping the health of the nation*". Lessons have already been learned from healthy new town demonstrator sites around the UK and principles for

healthy place making have been incorporated into the NHS [‘Putting Health into Place’ guidance](#).

The Marmot Report and 2020 update

- 2.5 The Marmot report of 2010 “[Fair Society, Healthy Lives](#)” stated that there must be prioritisation of policies that both reduce health inequalities and mitigate climate change by improving active travel, the availability of good quality open and free spaces, the food environment in local areas and energy efficiency of housing across the social gradient. It also suggested that planning, transport, housing, environmental and health systems should be fully integrated to address the social determinants of health in each locality.
- 2.6 Ten years on from that review, [an update published in 2020](#) by the Institute of Health Equity, highlighted various negative observations on health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health. It highlighted that the original recommendations made in 2010 are still relevant, and increasingly so, in many cases.

Marmot Places

- 2.7 The Institute has promoted the concept of ‘Marmot Places’, which are areas where local authorities and policy makers recognise that health inequalities are largely shaped by the social determinants of health and pursue policies and interventions that aim to improve health equity. Such interventions are based on the 8 Marmot Principles, and there is a commitment by such places to improve health equity over the short, medium and long term by:
1. Developing and delivering approaches, interventions and policies to improve health equity.
 2. Strengthening their health equity systems.
 3. Involving communities in the identification of the drivers of poor health and in the design and implementation of actions to reduce them.
 4. Broadening advocacy on health equity and engaging with other Marmot Places to share knowledge, roll out best practice alongside partners in local regions and nationally.

Regional supporting strategies

- 2.8 The [Oxfordshire Joint Health and Wellbeing Strategy \(2024-2030\)](#) sets out how the NHS, Local Government and Healthwatch will work together as the Oxfordshire Health and Wellbeing Board, to improve health and wellbeing in Oxfordshire. The vision of this strategy is:

“To work together in supporting and maintaining excellent health and well-being for all the residents of Oxfordshire”

- 2.9 To achieve this vision, the Health and Wellbeing Board propose to focus on:

- *Agreeing a coordinated approach to prevention and healthy place-shaping.*
- *Improving the resident's journey through the health and social care system (as set out in the Care Quality Commission action plan).*
- *Agreeing an approach to working with the public so as to re-shape and transform services locality by locality.*
- *Agreeing plans to tackle critical workforce shortages.*

2.10 Cutting across all of these priorities is a commitment to shift the focus to the prevention of ill health, reducing the need for treatment and care whilst also tackling health inequalities.

2.11 **Oxfordshire Local Industrial Strategy (July 2019):** Oxfordshire's LIS Vision Statement aims to position Oxfordshire as one of the top three global innovation ecosystems by 2040, building on the region's world leading science and technology clusters to be a pioneer for the UK in emerging transformative technologies and sectors. The LIS recognises the importance of planning for the health and well-being of communities and integrating the concept of healthy place shaping in developing communities. It also recognises the importance of 'inclusive growth' to ensure that the benefits of economic growth are felt by those in more deprived communities, thereby addressing the problem of income inequality that is a key cause of health inequalities.

Local Transport Connectivity Plan 2022-2050 (LTCP5)

2.12 The [LTCP5](#) was published in July 2022 and follows on from the previous **Local Transport Plan 2015-2031 (LTP4)**. The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there. The objectives of the strategies are to reduce the need to travel, reducing reliance on individual private car use and promoting alternative modes such as walking, cycling and public or shared transport as natural first choices.

2.13 There is a greater emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

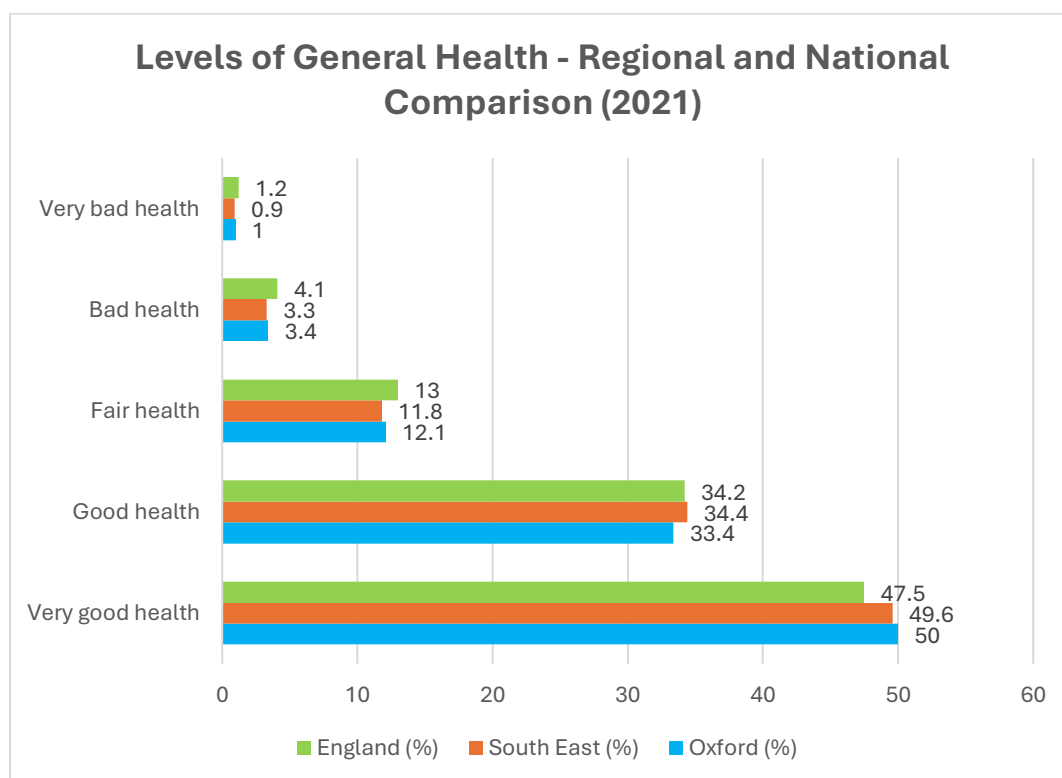
2.14 There are direct implications on public health and wellbeing, and the policies specifically focus on healthy place-shaping. The creation of liveable neighbourhoods, that are made up of communities where social connections are easy and local amenities and services are readily accessible, and where active travel (walking, cycling) is a viable option and car journeys are minimized. There is a greater ready availability of public or shared transport, and an environment that incentivizes active travel. The promotion of a net zero or 'decarbonised' transport network can also have impacts in terms of air quality.

- 2.15 **The Joint Strategic Needs Assessment Annual Summary Report 2023:** The Joint Strategic Needs Assessment (JSNA) monitors trends in the health and wellbeing of Oxfordshire's population and assesses changing patterns of need and demand for services across the county. Much of the data set out in this paper is taken from this report.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Levels of General health

- 3.1 In 2021, 50% of Oxford residents described their health as “very good”, increasing from 48.3% in 2011. Those describing their health as “good” fell from 33.8% to 33.4%. the proportion of Oxford residents describing their health as “very bad” was 1.0% (similar to 2011), while those describing their health as “bad fell from 3.9% to 3.4%.
- 3.2 Figure 3.1 shows a higher percentage of people in Oxfordshire report good or very good health than in the South East or in England. Oxford has a higher level of people reporting good or very good health than the national and regional average, but at a lower level than the last reporting in 2021. Compared across the county, Oxford has a lower level than West and South Oxfordshire districts.



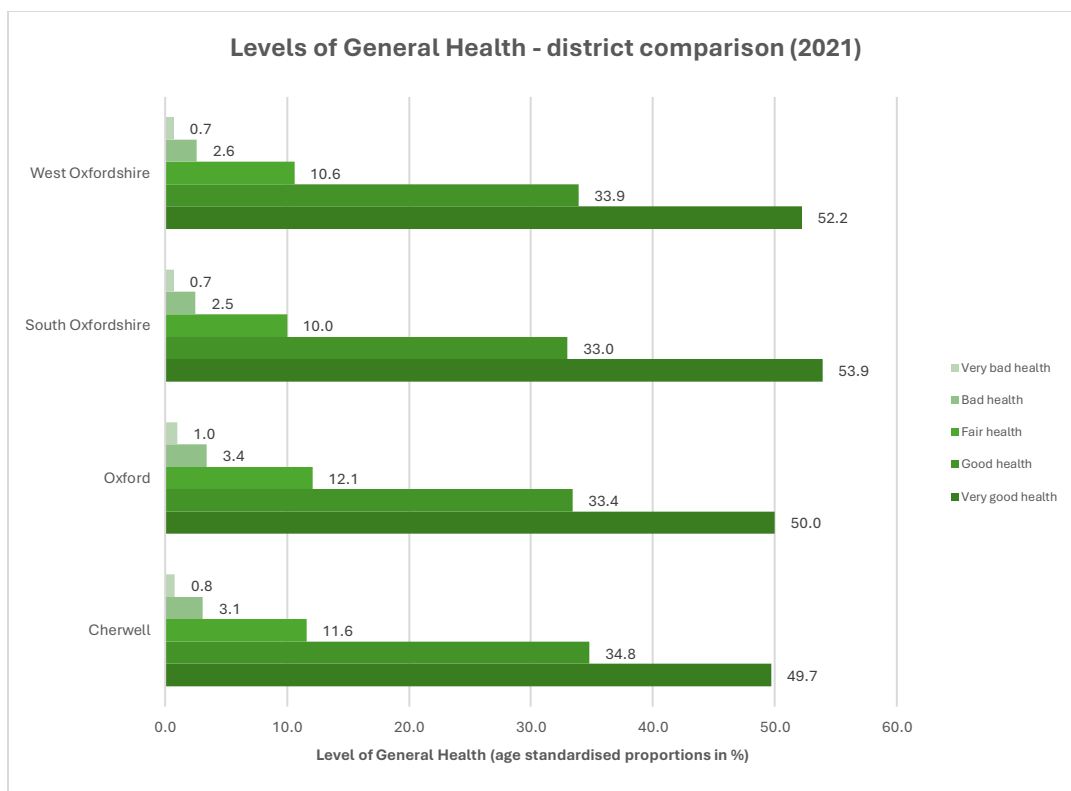


Figure 3.1 - Level of reported health – regional, national, and district comparison (Census 2021)

3.3 Figure 3.2 shows a range of health indicators and how Oxford compared to the benchmark of South East England and England. For several indicators, Oxford performs better than the benchmark, for example for life expectancy at birth (female), percentage of physically active adults, and Year 6: prevalence of obesity (including severe obesity).

Indicator	Period	Oxford		Oxon		England		England		Best
		Recent Trend	Count	Value	Value	Value	Worst	Range		
Life expectancy and causes of death										
Life expectancy at birth (Male, 3 year range)	2021 - 23	—	-	80.4	81.3	79.1	73.1		83.4	
Life expectancy at birth (Male, 1 year range)	2023	—	-	80.6	81.6	79.3	73.4		83.2	
Life expectancy at birth (Female, 3 year range)	2021 - 23	—	-	83.9	84.9	83.1	78.9		86.5	
Life expectancy at birth (Female, 1 year range)	2023	—	-	83.4	84.5	83.2	78.2		86.8	
Under 75 mortality rate from all causes New data	2024	➡	322	312.3	250.8	329.4	563.5		191.9	
Under 75 mortality rate from cardiovascular disease	2024	➡	67	68.4	51.4	74.3	138.9		33.8	
Under 75 mortality rate from cancer	2024	➡	111	108.0	102.1	117.9	169.0		74.6	
Suicide rate	2022 - 24	—	38	9.4	9.4	10.9	20.6		4.6	
Injuries and ill health										
Killed and seriously injured casualties on England's roads	2024	—	-	-	67.0*	89.8*	-	Insufficient number of values for a spine chart	-	
Emergency Hospital Admissions for Intentional Self-Harm	2023/24	↓	210	100.6	97.3	117.0	342.5		36.1	
Hip fractures in people aged 65 and over	2023/24	➡	120	560	519	547	849		120	
Percentage of cancers diagnosed at stages 1 and 2	2022	➡	245	59.3%	60.2%	56.8%	48.0%		66.8%	
Estimated diabetes diagnosis rate	2018	—	-	66.8%	67.2%	78.0%	54.3%		98.7%	
Estimated dementia diagnosis rate (aged 65 and older)	2025	➡	1,152	64.7	63.0*	65.6	45.3		94.2	
> 66.7% (significantly) similar to 66.7% < 66.7% (significantly)										
Behavioural risk factors										
Admission episodes for alcohol-specific conditions (under 18 years)	2021/22 - 23/24	—	15	17.3	18.3	22.6	75.2		3.8	
Admission episodes for alcohol-related conditions (Narrow)	2023/24	➡	574	445	414	504	890		240	
Smoking Prevalence in adults (aged 18 and over) - current smokers (APS) New data	2024	—	-	9.9%	7.5%	10.4%	20.8%		2.4%	
Percentage of physically active adults	2023/24	—	-	73.4%	73.9%	67.4%	48.9%		81.1%	
Overweight (including obesity) prevalence in adults, (using adjusted self-reported height and weight) (18+ yrs)	2023/24	—	-	49.6%	58.6%	64.5%	77.2%		42.6%	
Child health										
Under 18s conception rate	2022	➡	17	6.0*	9.2	13.9	34.4		4.2	
Smoking status at time of delivery	2024/25	➡	59	5.5%*	5.5%*	6.1%	13.2%		2.2%	
Infant mortality rate	2022 - 24	—	16	3.7*	2.4	4.2	8.7		1.2	
Year 6 prevalence of obesity (including severe obesity) (10-11 yrs)	2024/25	—	250	19.0%	17.8%	22.2%	30.7%		9.7%	
Deprivation score (IMD 2019)	2019	—	-	16.7	11.7	21.7	45.0		5.5	
Inequalities										
Smoking prevalence in adults in routine and manual occupations (aged 18 to 64) - current smokers (APS) New data	2023	—	-	*	15.3%	19.5%	54.8%		2.4%	
Inequality in life expectancy at birth (Male)	2021 - 23	—	-	9.6*	5.4*	10.5*	17.2		0.5	
Inequality in life expectancy at birth (Female)	2021 - 23	—	-	8.5*	4.8*	8.3*	14.9		0.3	
Children in relative low income families (under 16s)	2023/24	↑	4,189	16.7%	11.7%	22.1%	44.6%		5.6%	
Wider determinants of health										
Children in absolute low income families (under 16s)	2023/24	↑	3,562	14.2%	9.8%	19.1%	40.7%		4.7%	
Average Attainment 8 score	2023/24	—	-	46.4	46.4	45.9	36.1		58.3	
Percentage of people in employment	2024/25	➡	79,200	73.5%	82.4%	75.7%	61.0%		88.1%	
Homelessness: households owed a duty under the Homelessness Reduction Act	2023/24	➡	792	15.1	9.6*	13.4	30.6		2.9	
Violent crime - hospital admissions for violence (including sexual violence)	2021/22 - 23/24	—	130	23.2	15.6	34.2	170.5		6.3	
Winter mortality index	Aug 2021 - Jul 2022	➡	20	7.5%	12.6%	8.1%	30.1%		-11.5%	
Health protection										
New STI diagnoses (excluding chlamydia aged 24 years and under) per 100,000	2024	↑	1,001	606	358	482	2,903		126	
TB incidence (three year average)	2022 - 24	—	76	15.4	7.2	8.5	42.1		0.7	

Figure 3.2 Health indicators, Oxford compared to benchmark of Oxfordshire and England (Department of Health and Social Care, 2023)

Active Travel

- 3.4 The latest Sport England data (November 2023-24) shows that the South East of England Region had a lower proportion of adults (33%) participating in active travel (at least twice in the last 28 days) compared to Oxford City (56%)
- 3.5 There has been a rise in active travel in all districts since November 2020-21. However, active travel remains lower than before the coronavirus pandemic which may be due to changes in active travel because of home working.

— Participation in the last 28 days : At least twice in the last 28 days by Active travel
Nov 23-24

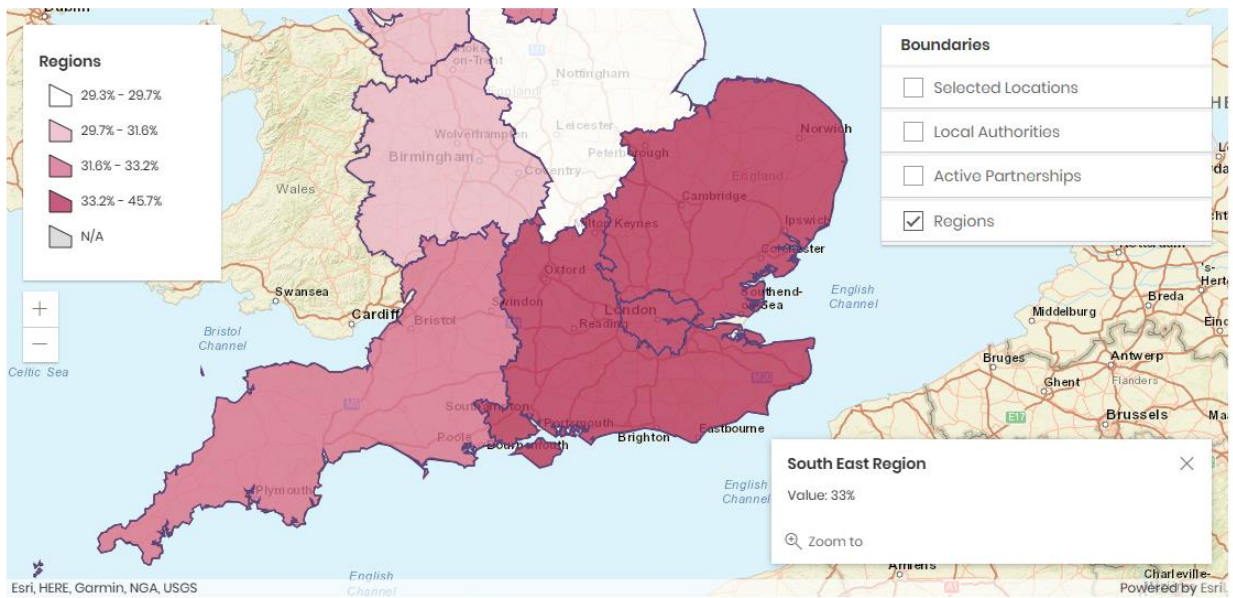


Figure 3.3 Regional participation in active travel (Sport England, 2026)

— Participation in the last 28 days : At least twice in the last 28 days by Active travel
Nov 23-24

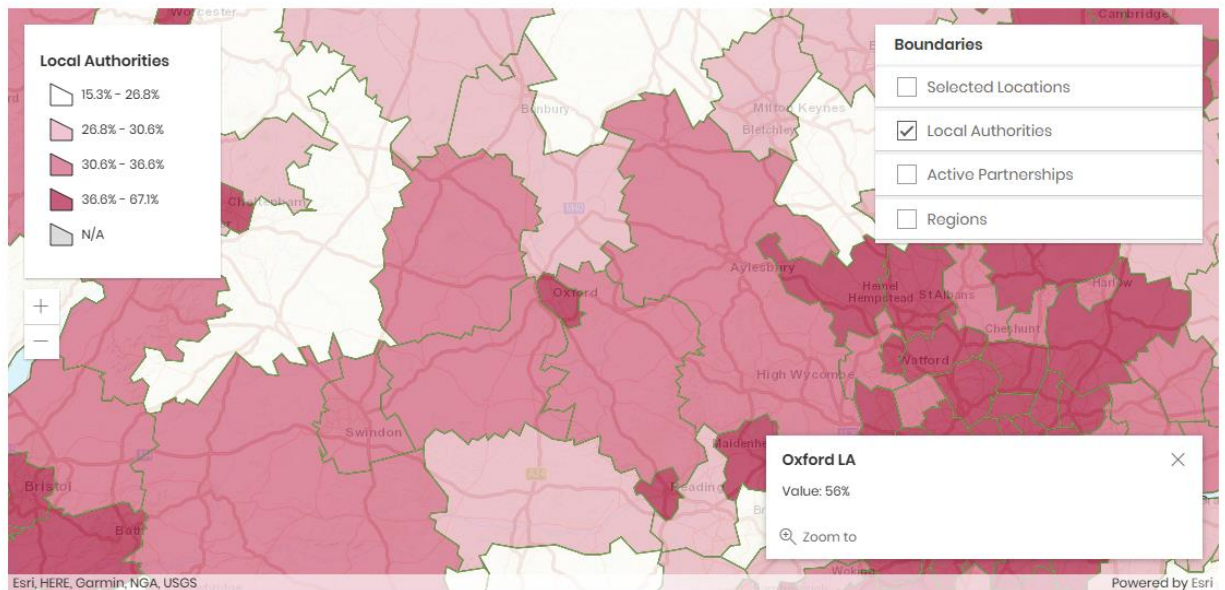


Figure 3.4 Oxford participation in active travel (Sport England, 2026)

Isolation and loneliness

- 3.6 Various national and international research studies have linked social isolation and loneliness with adverse health outcomes, including higher mortality rates. Social engagement has also been found to be a driver of quality of life. The coronavirus pandemic has had a notable impact on the way people live their lives and as such, reported levels of loneliness in Great Britain have increased since spring 2020.

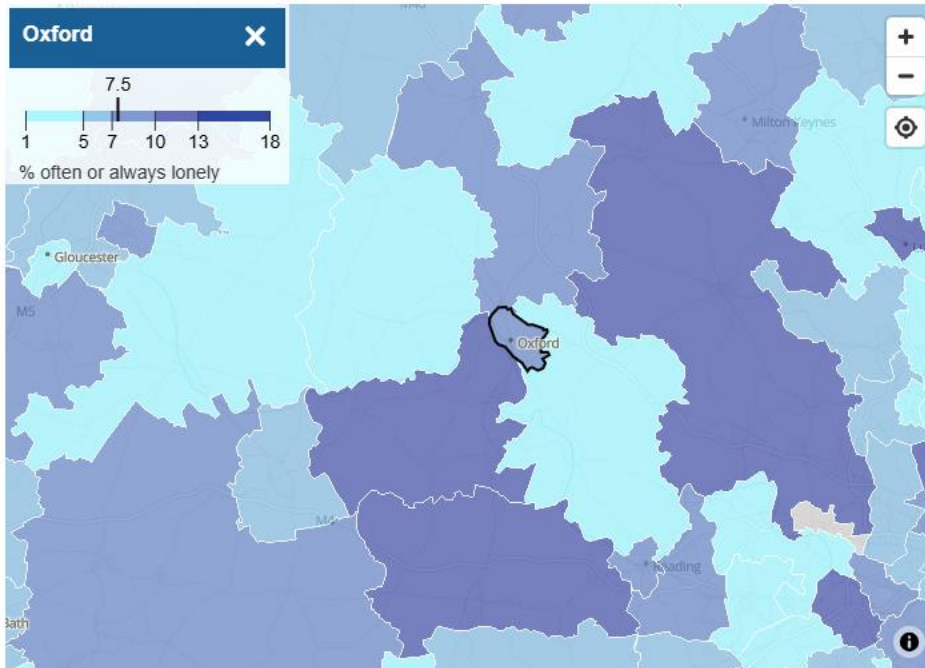


Figure 3.5 Loneliness rates by local authority (Office for National Statistics, 2021)

Air Quality

- 3.7 In September 2010 Oxford City Council made an Air Quality Management Order declaring the whole of the city as an AQMA, to include the 7 localised hotspots where pollution levels of nitrogen dioxide have exceeded national objectives. It is one of 13 designated Air Quality Management Areas in Oxfordshire, where air quality objectives are not being met. The latest (2020) modelled air pollution data from DEFRA indicate that sites with the highest readings for Nitrogen Dioxide (NO₂) in Cherwell, Oxford and West Oxfordshire have each seen a slight increase since 2020.

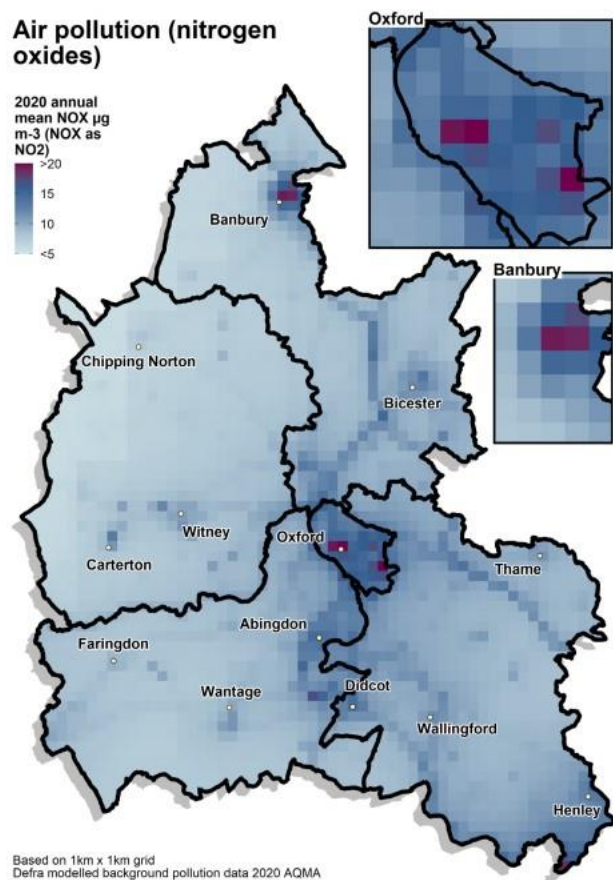


Figure 3.6 - Air pollution in Oxfordshire (Source: Defra modelled background pollution data via Oxfordshire JSNA 2023)

Inequality and health outcomes

- 3.8 Despite the relative levels of economic prosperity in Oxford, there are still great inequalities within the city. This is reflected in health outcomes and life expectancy. At ward level it can be observed that the life expectancy tends to negatively correlate with the level of deprivation.

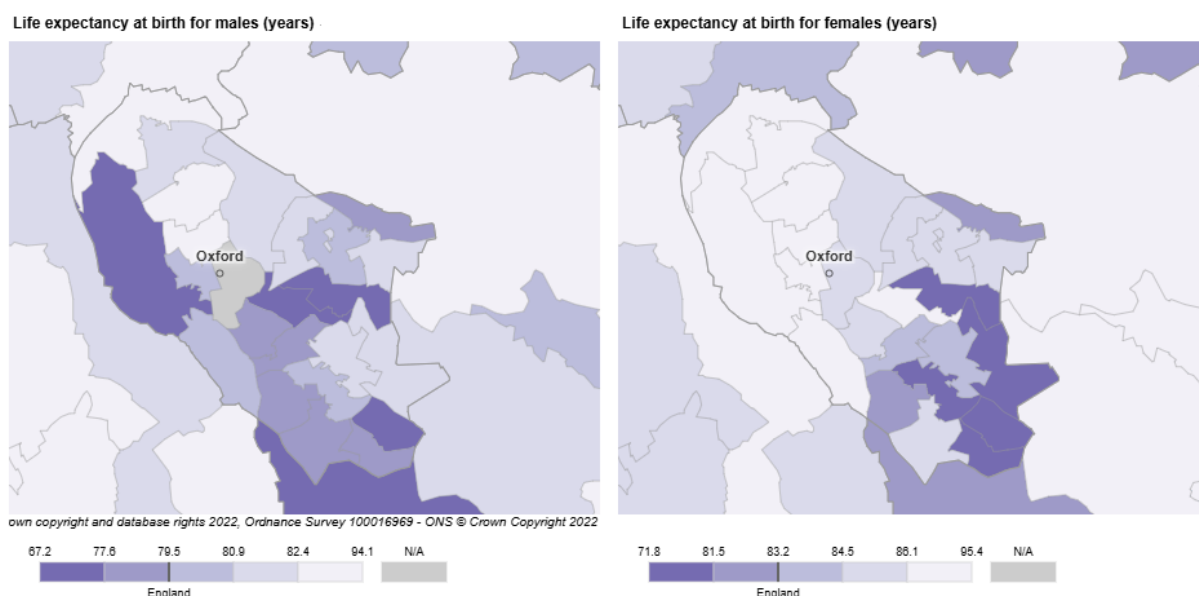


Figure 3.7 - Comparative life expectancy across Oxford wards: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Table 3.1 - Life expectancy compared across wards in Oxford. Source: Office of Health Improvement and Disparities analysis (accessed 6 January 2025)

Ward	Life expectancy at birth for males	Life expectancy at birth for females
Barton & Sandhills	79.4	81.8
Blackbird Leys	74	80.9
Carfax & Jericho	80.6	90.8
Churchill	76.7	81.1
Cowley	80.2	79.5
Cuttleslowe & Sunnymead	81.6	88.5
Donnington	79	83.3
Headington	79.5	85.5
Headington Hill & Northway	81.4	85.5
Hinksey Park	80.6	86.1
Holywell	N/A - not available	85
Littlemore	78.5	85.4
Lye Valley	80.9	81.3
Marston	81.2	85.1
Northfield Brook	77.7	79.7
Osney & St Thomas	77.3	86.3
Quarry & Risinghurst	81	84.9
Rose Hill & Iffley	78.6	82.5
St Clement's	76.1	87.7
St Mary's	79	85.3
Summertown	87	87.1
Temple Cowley	82	83.5
Walton Manor	85.4	89.1
Wolvercote	83.3	90.9

Health Deprivation

- 3.9 The Health domain of the Index of Multiple Deprivation is the official measure of relative deprivation in England. Within Oxford, there is wide variation in the level of health deprivation, as shown in Figure 3.8. Areas of the city with high levels of health deprivation include Blackbird Leys. The majority of least health deprived areas, as shown by Figure 3.8 are located within the north of the city.

3.10 In 2025, only 1 of Oxford's Lower Super Output Areas (LSOAs) fell into the 20 per cent most deprived, compared with 2015, where 12 of Oxford's LSOAs fell within the 20 per cent and 2 LSOAs in the 10 per cent most deprived nationally.

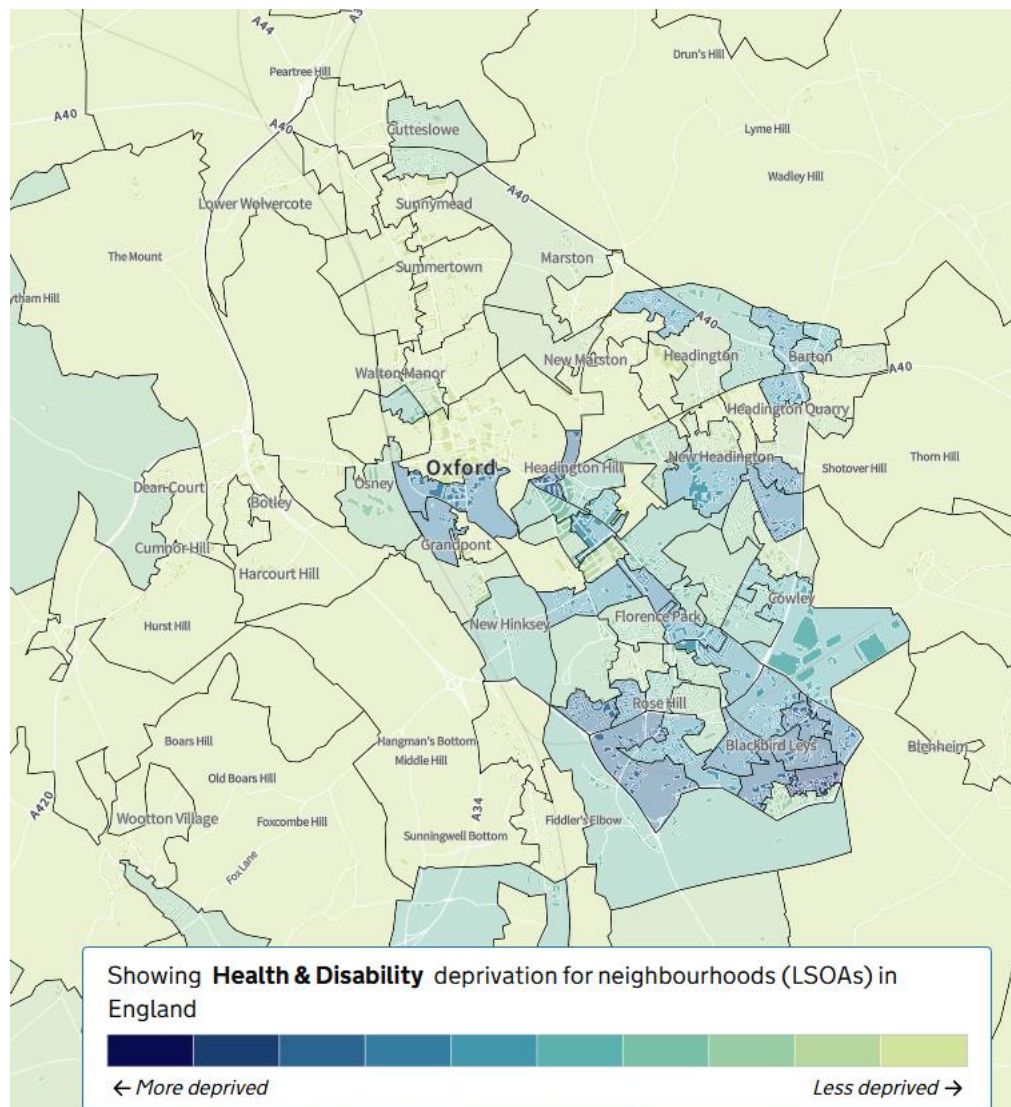


Figure 3.8 - Health deprivation and disability in Oxford (English indices of deprivation 2025)

Employment Deprivation

3.11 Being in employment has been linked to improved health and particularly mental health. Figure 3.9 shows the proportion of the working-age population involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities. There are no areas in Oxford within the 10% most deprived areas in England for this indicator, but a number of areas, predominantly in the south of the city, fall within the 20% most deprived areas in England for employment deprivation.

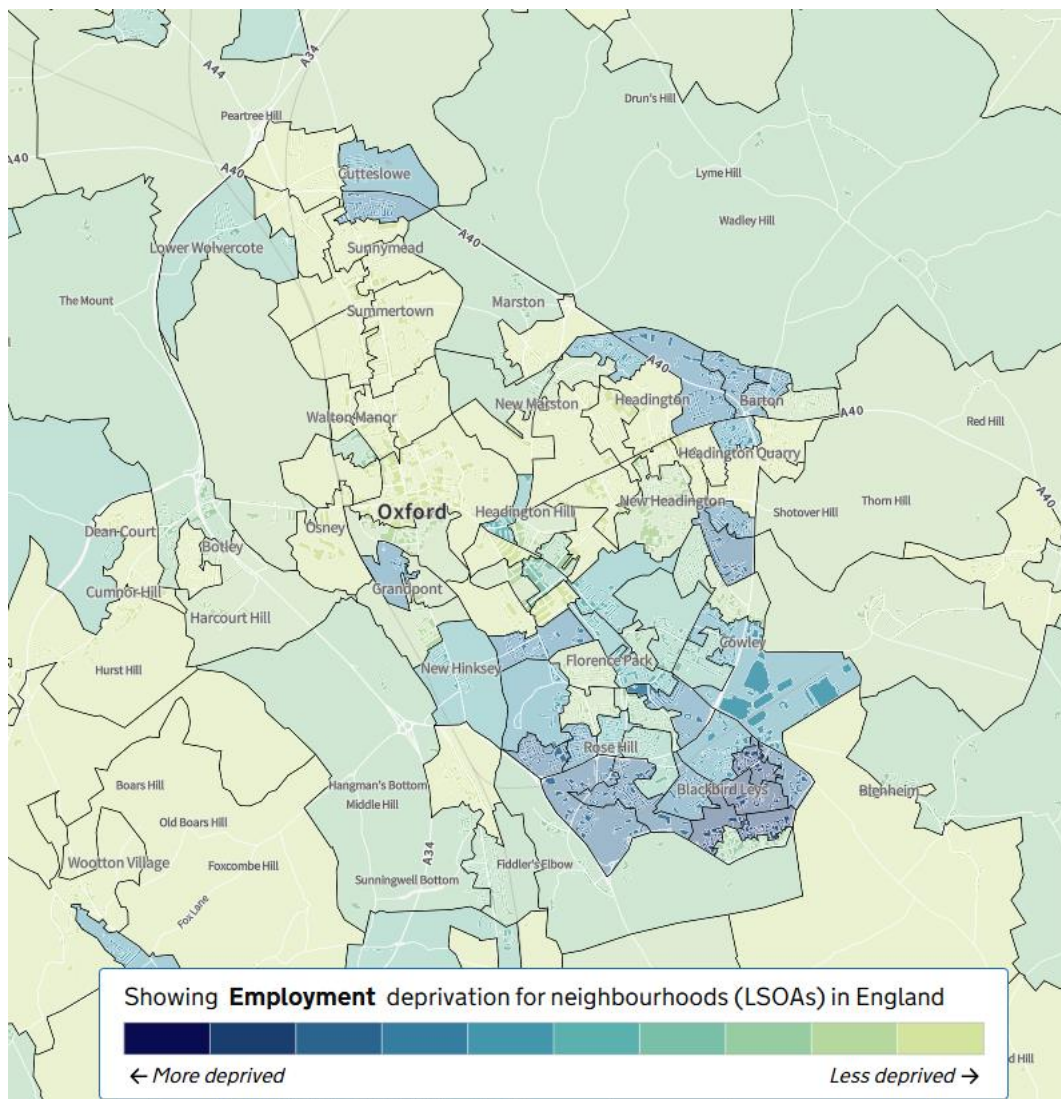


Figure 3.9 - Employment deprivation in Oxford (Oxfordshire County Council 2019)

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

What trends do data show?

- 4.1 For Oxford as a whole the trends indicate an overall improvement in overall measures of good health, which is likely to be the result of improvements to services and treatments, specific interventions and an increase in awareness and education of lifestyle factors in particular. This is positive when taking into consideration the broader national picture of health and wellbeing in England, which highlights various negative observations of health equity across England, including a stalling in improvements to life expectancy, an increasing health gap between the wealthiest and poorest parts of the country, and that people are spending more of their lives in poor health.

- 4.2 The data does show, however, that there are several areas where Oxford performs below the local or national average, where more focus is needed to secure similar improvements. It also demonstrates that there are significant health inequalities within the city, typically linked with levels of socio-economic deprivation, which need to be a priority for future health interventions and strategies.

Health and wellbeing in the context of the climate emergency

- 4.3 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford, but for those living in poor health, the risks are exacerbated. Indeed, regardless of our achievements in relation to climate mitigation (cutting carbon emissions), climate is expected to change in the future due to historic greenhouse gas emissions that have already 'baked in' changes in the climate system.
- 4.4 The impacts of hotter summers and prolonged heat wave events for example have been shown to be particularly threatening for those with pre-existing health conditions such as heart and lung disease, as well as the young and the elderly. The ongoing stress that is caused by flooding events, and just the threat of flooding, can be taxing on residents' mental health and this is likely to be a particular issue for those already in poor mental health.
- 4.5 Climate-related risks are further compounded by the particular challenges faced by those living in high socio-economic deprivation. As was evidenced earlier in the paper, those living in more deprived areas in the city are more likely to be living with worse health and wellbeing thus potentially being at higher risk from stresses related to climate change. Furthermore, those living in areas of deprivation may have fewer resources (financial and material) to adapt to changing climate, for example finding it harder to afford cooling measures to cope with high heat in the summer, or to pay for insurance that can cover damages during a flood event. There is also the issue that some may be living in poorer quality accommodation, which is ill-equipped to function in future climate.
- 4.6 Recent research by the Oxfordshire County Council as part of their County-wide Climate Vulnerability Assessment 2024 confirmed that current heat wave risk is concentrated in the most urban parts of the county and is only exacerbated in future according to different projections for 2050. Eight of the ten wards in Oxfordshire with the highest current heatwave risk are located in the Oxford City (Barton and Sandhills, Blackbird Leys, Cutteslowe and Sunnymede, Carfax and Jericho, Holywell, Littlemore, Northfield Brook and Walton Manor), including some in higher deprivation areas. Six of these wards remain in the top ten for 2050 projections (Littlemore and Walton Manor are replaced by other wards in the county).

Considerations for the new Local Plan

- 4.7 Good health includes physical, social and mental wellbeing going beyond simply the absence of illness and care of persons who have become ill. The Local Plan has a role to

play in considering all of the aspects that impact on an individual's health and to help influence positive health and wellbeing outcomes across all parts of the city.

- 4.8 Indeed, health and wellbeing is a wide-ranging topic that will be influenced by many, if not all, of the policies within the Local Plan. The emerging Local Plan aims to integrate health and wellbeing considerations in a variety of areas, including:
- 4.9 **High quality housing** – The type of housing someone lives in can negatively impact on their health and wellbeing in a number of ways if it has not been appropriately designed. Poorly designed housing that provides inadequate levels of daylight or ventilation; overcrowding; injuries in the home; or inadequate heating or cooling of the building can all have direct and indirect impacts on physical and mental health. This is an issue that has become more prevalent throughout the Covid-19 pandemic, which saw the population forced to spend greater amounts of time at home in general, as well as for work and exercise. However, housing standards and quality are largely governed by the Government's nationally set building standards and cannot be influenced by local planning policies.
- 4.10 **Transport and accessibility** – Improving access and movement around the city is important for an individual's health and wellbeing for several reasons. Improving the connections between places can help people to integrate with their communities and reduce the chances of social isolation. Availability, quality and choice of modes of transport are also important not only for facilitating travel to employment, healthcare and social facilities, but also for ensuring people can utilise active travel methods such as walking and cycling, over the car. Transport emissions can also cause adverse health impacts on human health: the local plan can play a role in reducing these and the effect they have on people.
- 4.11 **Social infrastructure** - Provision of social infrastructure is vital for vibrant neighbourhoods, and this can include uses such as schools; health centres; local food shops; public buildings, local workplaces and open spaces. Neighbourhoods which enable residents to have good access to goods and services and which provides opportunities for social interaction such as in parks can improve social interaction and promote a feeling of community.
- 4.12 **Natural environment** – The quality of the environment and in particular, access to green space can have a positive impact on health and wellbeing, through increased physical activity and mental health benefits stemming from taking a break from heavily urbanised environments. Healthy environments can also provide opportunities for local food growing which can help promote healthy diets and active lifestyles. Poor air quality can be one aspect of an unhealthy environment and is an important issue in Oxford with impacts on a range of health problems including asthma and cardiovascular diseases.
- 4.13 **Climate resilience** – Much of what is being built today will be around for the next 50-100 years and thus will need to be able to function and respond to the projected changes in climate that Oxford will face in the future. Development that is able to keep residents cool during warm summer weather will be essential in order to reduce risks from heat stress,

whilst flood resistance (keeping water out) and resilience (allowing quick clean up and drying out) measures will help to reduce danger to life and the ongoing stresses that flooding can cultivate. This issue will be particularly important for the most vulnerable communities in the city.

- 4.14 **Health inequalities** - Whilst working to ensure that negative impacts on health and wellbeing are avoided and positive impacts maximised for everyone, it will also be important for the new Local Plan to work towards reducing the health inequalities that exist in the city. This could take the form of targeted interventions in particular areas in need, as well as ensuring that the issues of health inequality are considered throughout the planning process.
- 4.15 **Health Impact Assessment** - The current Local Plan requirement for HIAs on new development is likely to remain an important approach to ensuring that developers consider issues of health and wellbeing throughout the development process. Furthermore, to ensure that health and wellbeing considerations have been embedded sufficiently through the Local Plan, the Council's intention is that the development of its constituent policies should be informed by a high level Health Impact Assessment (HIA). There is no single, nationally applied standard for how local plan HIAs ought to be conducted, though there is a range of guidance and examples of best practice that the Council can draw upon. Work being undertaken at the county level will also help guide the approach, and it will also be important to engage with colleagues in Public Health on this process throughout.

5. Key Issues addressed through the Local Plan

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to health and wellbeing objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. It is important to note that some policy reference numbers have been updated as a result of amendments made post the Regulation 18 consultation.

- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Health Impact Assessments

- 5.3 As was set out earlier in the paper, there are clearly health and wellbeing challenges affecting the communities within Oxford. Inappropriate or poorly designed development has the potential to exacerbate some of these issues if these are not sufficiently incorporated into the design process. For this reason, the Local Plan 2045 continues with a requirement of major

development needing to undertake a Health Impact Assessment (now: Policy HD7) as with the previous Local Plan.

- 5.4 The purpose of Health Impact Assessment (HIA) as part of the planning application process is to ensure that the design of new development is tailored to the particular local health context of the area where it is proposed. Producing an HIA should be far more than just a tick box exercise; the process seeks to ensure that the impacts of new development do not further exacerbate negative health trends, whilst also helping to identify and take up opportunities to ameliorate these conditions and secure positive impacts that support wellbeing. The policy sets out the high level requirements that applicants are expected to follow, including undertaking analysis of the local context and presenting appropriate data on these conditions and then using this to demonstrate how they have addressed the design of their development informed by this understanding. Where impacts are identified, these need to be appropriately addressed (and mitigated where necessary) and details of any monitoring required to ensure mitigations are successful should also be provided.
- 5.5 Whilst the policy sets out the high-level requirements that the Council will look for to ensure that a proposal has demonstrated that health impacts have been appropriately addressed as part of the design process, there are a number of different methodologies available for how Health Impact Assessments can be specifically undertaken in practice. The policy is supported by an Appendix which sets out more specifics as to the kind of format that the HIA should follow and refers applicants to the toolkit that has been specifically developed by Oxfordshire County Council and that was approved for use by all six Oxfordshire Local Authorities by the Future Oxfordshire Partnership (formerly known as the Oxfordshire Growth Board) on 26 January 2021. The toolkit includes briefing notes as well as a checklist that will help applicants to focus their analysis on the key issues of relevance. A Technical Advice Note (TAN) also contains information to support the preparation of HIAs.
- 5.6 Ultimately, ensuring that new development undertakes HIA will help to support higher quality design in the city. The policy is designed to be flexible enough to allow applicants to tailor the level of information they provide as part of the HIA to be proportionate to the scale of the development, whilst also ensuring that the key elements are addressed (such as being informed by relevant contextual data). In this way, HIAs provided should include enough information to allow the Council to make an informed judgement as to any potential negative or positive impacts for health and wellbeing in the city, without being overly burdensome to applicants.

Privacy, Daylight and Sunlight

- 5.7 Ensuring all homes are built with adequate privacy, daylight and sunlight (both internal and external) helps to ensure the wellbeing of residents. It is also important to consider the impacts on neighbouring residential properties to ensure they do not lose their sense of privacy. This is particularly important in the context of Oxford, where high density development is expected in some areas of the city to make efficient use of land.

- 5.8 The policy approach will ensure that new development provides adequate daylight and privacy and will not reduce privacy and daylight in existing development to an unacceptable level.

Internal Space Standards for Residential Buildings

- 5.9 It is important to ensure that new homes are of an adequate size and layout to provide high quality, functional homes that meet the needs of a wide range of people and take into account how those needs might change over time. This should apply to development at all scales, from large strategic sites to infill development, which represents an important contribution to meeting Oxford's housing need.
- 5.10 The pressure to deliver more homes leads to increased pressure to deliver smaller homes. This could result in housing that is unacceptable in terms of internal space because it doesn't offer occupiers appropriate living standards or meet the national aim that everyone should have access to a decent home. The pressure to make efficient use of land, and the fact that dense development is to be required, makes it particularly necessary to ensure that the internal living environment of new homes is adequate.
- 5.11 The policy has been carefully informed by a consideration the local need for space standards and the viability impact of taking such an approach and the approach is to adopt the optional nationally described standards. In addition, minimum bedroom sizes for HMO are governed by the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018.
- 5.12 The policy will ensure that new developments are designed and built to provide adequate space for occupants. It will be important to ensure that designs maximise the useable space within housing, through functional layout, and provide scope to adapt and modify housing to meet future requirements. The demand for housing in Oxford means that a small proportion of larger and family homes will be provided in the form of flats or apartments; ensuring adequate space and quality environments will play a crucial role in changing the perception of apartments and their suitability as family homes.

Outdoor Amenity Space

- 5.13 The adequate provision of outdoor amenity space is a key factor in supporting the physical and mental health and wellbeing of residents. It provides a space to dry clothes, grow plants and vegetables, and can provide shade and limit urban heat-island effects. In addition, if the space is designed with permeable surfaces it can contribute towards flood risk management.
- 5.14 Where high density development and subdivision of properties are expected and where many sites are infill development, high standards for the delivery of good quality outdoor amenity space becomes increasingly important to ensure the health and wellbeing of residents.

- 5.15 New homes should provide some open space that allows the occupants to enjoy fresh air and light in privacy. The policy will ensure that appropriately sized balconies/private terraces and private/ shared garden space is provided for residents.
- 5.16 The policy approach will ensure that both public and private amenity and garden spaces are well designed and ensure that it is clear how these spaces are used without the need for extensive signage, avoiding narrow pathways to link spaces, optimising sunlight, and ensuring principles of good landscape design are incorporated.

Accessible and Adaptable Homes

- 5.17 Housing provision across the city should meet the needs of everyone and new homes need to be accessible to all, including those with disabilities. As such, it is important to consider the demands and requirements people will have from their homes and how this may change over time. Homes need to be built with the flexibility to be adapted to the changing needs of residents. Adaptability is important to respond to changes to the size and compositions of households, and an ageing population.
- 5.18 Providing opportunities for residents to maintain their independence is important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs. In addition, housing needs to be adapted to support those with chronic health conditions and specialist housing needs. Ensuring we build homes that can be adapted to meet people's longer-term needs is an important part of good design.
- 5.19 The policy approach is to provide enhanced accessibility or adaptability through Requirement M4(2) Accessible and adaptable dwellings and/or M4(3) Wheelchair user dwellings in 'Approved Document M: access to and use of buildings. To ensure provision of housing to meet the range of needs that will exist in Oxford and because of the advantages of dwellings that can adapt to changing needs, requirements for accessible and adaptable dwellings are set out in the policy.
- 5.20 Oxford has a markedly young population compared to neighbouring districts and the UK, mainly because of the substantial number of students. The trend of Oxford having a younger population than average is set to continue; however, people are living longer and there will be an increase in the number of older people resident in the city. As it is likely that Oxford will have a greater proportion of older residents making up its population, there will be changing housing requirements over the Plan period. The Census 2021 showed 5.3% of the population of Oxford are 75 or over. This is lower than the national average, but that represents a section of the population more likely to need adaptable homes in order to remain living in them for longer. The Census 2021 shows that 29% of households in Oxford have one or more people with a disability. Some of those households will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them. The Government has found that 34% of disabled people have had to make adaptations to their homes [UK Disability Survey](#)

[research report, June 2021 - GOV.UK](#). Therefore, at least 10% of homes should be adaptable, but given the increasingly aging population and the proportion that are already over 75, the policy requires that 15% of market homes meet Category 2 Standards of Part M of the Building Regulations.

- 5.21 Some typologies of development will not be suitable for providing homes that meet M4 requirements because these require level access to the front door and so must have lifts. As well as installation costs they have ongoing maintenance costs (which are likely to affect residents' ground rents). This will affect viability and will not be feasible unless a certain number of units are served by one lift shaft. This will be less likely on lower blocks of flats. There may be other options, such as provision of one and two bed units in terraced houses instead of flats, maisonettes with accessible homes below and so on. But these options will often not be feasible, in which case the policy allows schemes with fewer or no dwellings that meet Part M of the Building Regulations.

Appendix A - Policy options and preferred approaches

Policy options set 010a (Draft Policy HD10): Health Impact Assessments

The process of undertaking Health Impact Assessment (HIA) ensures that development promotes and contributes to a healthy living environment, by requiring that local context and particular issues are assessed and then addressed through the design process. The benefit of HIA is greatest when it is conducted at the earliest opportunity to inform the design process. The current local plan requires the undertaking of HIA for major development and the options below set out alternative approaches with respect to continued HIA requirements.

Table 7.1 - Policy options set 010a: Health Impact Assessments

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require an HIA for all developments over a certain size- for example for major developments (as currently). This requirement could be integrated with others such as demonstrating resilient design and construction.	A checklist based template is straightforward and would keep the process fairly streamlined. The intention of this approach is that healthy design is considered from the outset and therefore factored in.	This may be seen as an extra administrative burden on developers, and on those assessing applications.
Option b Include a requirement for HIAs, not just based on a size threshold but other factors such as socioeconomic, health or environmental factors that could trigger the need for a more extensive HIA. Wider categories for	More development is subject to an HIA, which ensures issues are properly considered and addressed at an early stage of the development.	There is limited evidence that expanding the range of development will bring additional benefits. This may create an onerous process where the drawbacks outweigh any benefits.

development that will be subject to an HIA.		
Option c No specific policy requirement, rely on NPPF.	Less burden on developer who will cover off the points in an HIA as part of application process.	Not having a policy makes it harder to have a consistent metric to assess schemes.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? A, b or c (they are all alternatives).

High-level screening conclusion? the options are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? No

Rationale:

The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible services/facilities, resilience to climate change etc). Option a and b are likely to have a minor positive impact on inequalities (and option b is likely to be a slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as whilst there is some discussion over what health and wellbeing considerations should factor into planning proposals, there are not explicit requirements, so there is much more potential for development to come forward in unhealthy way. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Health Impact Assessments – Policy HD10

The preferred approach is to take forward **option A**. This option is a continuation of the approach followed by the currently adopted 2036 Local Plan, whereby it is a policy requirement for applicants for qualifying development schemes (currently major development) to submit an HIA. This approach is considered to be the most appropriate for assessing schemes that are the most likely to have an impact on the health and wellbeing of the contexts in which they are set in.

Policy Options Set 010b (Draft Policy HD11: Privacy, Daylight and Sunlight)

There are many factors in the built environment that can affect our health and wellbeing, but it is particularly important to ensure that the places where we spend so much of our daily lives, such as our homes and workplaces, enable us to be healthy and happy. The recent Covid pandemic, with the need for social distancing and the shift to home working for some people, has highlighted the importance of having a healthy home setting for us all, and of particular importance to this internal environment is having ample daylight and privacy.

Table 7.2 - Policy options set 010b: Privacy, Daylight and Sunlight

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Extend the policy to also include expectations for daylight, privacy and sunlight for new non-residential buildings (types to be specified but likely to include offices and similar workspaces, potentially healthcare facilities but may exclude manufacturing and warehouses, retail units), to ensure good working conditions and to ensure consideration of impacts on neighbouring buildings. This will also need to be	These requirements for non-residential buildings may prevent buildings with a large mass, which would have the benefit of more appealing design. It is also likely to reduce energy use due to minimising the need for electric lighting (and potentially also improving natural ventilation). The working environment would also be healthy. Helps meet BRE sunlight/daylight guidance.	This may be restrictive to certain building needs or may affect viability due to reducing the potential for subdivision of a building, or for large machinery. Its application is unlikely to be possible universally so the policy must specify when it applies and when it does not.

considered alongside shading and overheating impacts.		
Option b Include a policy with requirements to ensure adequate daylight, privacy and sunlight to new residential developments.	This would ensure new development provides adequate daylight and privacy and does not reduce privacy and daylight in existing development to an unacceptable level.	This may be too restrictive for certain buildings and/or may impact upon viability due to reducing the potential for subdivision. This needs to be considered alongside considerations of sustainable design and construction, such as avoiding overheating.
Option c Do not include a policy on privacy, daylight or sunlight for any type of development.	This would provide more flexibility for design to reflect the location and other factors.	This could result in poor quality design in new development that does not have sufficient daylight or privacy for its occupants and could reduce daylight or privacy to neighbouring development to an unacceptable level.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options (A+B, C)

High-level screening conclusion? The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities**, as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion. Option a and b are likely to have a minor positive impact on inequalities (and option b is likely to be a slightly more positive impact because it incorporates a greater area of the city/more development). Option c is likely to be a minor negative, as it may result in a greater potential for poor quality development – building regulations include standards for window sizes/orientation, daylighting design and good practice for daylight levels, however they do not explicitly state minimum requirements for daylight/sunlight or privacy.

Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Privacy, Daylight and Sunlight – Policy HD11

The preferred approach is to take forward a combination of **options A and B**. This approach will ensure that policy requirements include minimum standards that can be expected for the amenity of occupiers of development (with respect to privacy, access to daylight and sunlight), in terms that can be measured and monitored, and it also allows policy to specify the types of development for which these standards will apply – including the option of having requirements that apply to non-residential development. This will broadly follow the policy approach as followed by the currently adopted 2036 plan.

Policy options set 010c (Draft Policy HD12:) Internal Space Standards for Residential Buildings

New homes, whether they are infill plots or on larger sites, need to be of an adequate size and layout to provide high quality functional homes that meet the needs of a wide range of people. The pressure to build more homes can lead to the building of smaller homes if standards aren't set, which could result in housing being built that does not provide future occupants with appropriate living standards.

Table 7.3 - Policy options set 010c: Internal Space Standards for Residential Buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Apply Nationally Described Space Standards. In flatted schemes, require communal areas to be designed to enable neighbours to meet and interact, for example some fixed seating, wider	Following the Nationally Described Space Standards should ensure that developments maximise the useable space within housing through functional layout and provide scope to modify	Oxford is highly constrained spatially and by adopting these standards it could result in reducing the number of houses being delivered. It may become unnecessary to have this policy if the intended national development management policies cover this (which should not be repeated or contradicted in local plans).

areas of corridor or lobby space.	layouts for future needs. Design of developments can be important in helping people avoid social isolation and loneliness. In flats, communal areas that allow neighbours to interact is likely to facilitate successful inter-generational living. Including these standards is important in Oxford because development pressure is so great and heights are constrained, so without requirements housing could be inadequately small.	
Option b Do not include a policy on internal space standards (if the national standards are not adopted locally then they do not apply).	Does not restrict homes being delivered where space is so limited. If space requirements are written into national policy this will become the preferred option as having a local policy will be unnecessary.	Having no space standards for self-contained dwellings could result in the delivery of housing that is of poor quality with an unacceptable amount of internal space for its occupants.
Option c Include a policy but do not follow the Nationally Described Space Standards.	Provides more flexibility for the delivery of new homes which is so urgent in Oxford.	Government policy is very clear that either the nationally described standards are followed or there is no requirement included in plans, so it is very unlikely that this approach could be justified.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Yes

High-level screening conclusion? The options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities**, as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion. Option c is unlikely to be justified, as it will contradict current national policy and if implemented will most likely encourage the development of schemes with poor quality of space for occupants. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

Internal Space Standards for Residential Buildings – Policy HD12

The preferred approach is to take forward is **option A**. Government policy does not allow much flexibility for authorities to set bespoke standards, and as such the approaches available to plans are for national space standards to be followed, or no standards to be specified. A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Policy Options Set 010d (draft Policy HD13): Outdoor Amenity Space

The adequate provision of outdoor amenity space is important as it supports the physical and mental health and wellbeing of residents. Well-designed outdoor amenity spaces enhance the immediate and surrounding areas and provide much needed open spaces for residents, particularly those who do not have access to their own private garden.

Table 7.4 - Policy options set 010d: Outdoor Amenity Space

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include an outdoor amenity space requirement for all residential units, with size standards. This could allow flexibility between communal and private space and balconies would be included to ensure flats are deliverable. Include a requirement for outdoor areas	This would ensure that outdoor amenity space provided as part of new development would be well designed and provides more certainty about the level of provision. Requiring space for meetings and interactions may help to reduce loneliness and social isolation.	This could be too prescriptive, and the amount required may not be deliverable or viable. There is no requirement currently for communal outdoor amenity space for flats- it may be hard to know how to set this in a way that can be justified.

where neighbours can meet or interact.		
Option b Include a policy that sets out broad principles required for amenity space for housing but no size requirement.	This approach would be less prescriptive but encourage good design by setting out broad principles.	Potential for poor design and quality and not a large enough quantity of outdoor amenity space to serve needs.
Option c Set a requirement for outdoor amenity space for larger non-residential developments.	This approach ensures biggest non – residential schemes have well designed outdoor amenity for users of the development and, if well landscaped, this enhances the attractiveness of the design and potential for benefits of green spaces such as biodiversity and enhancing wellbeing.	Private amenity space at workplaces should not be needed if there is adequate public open space in an area and in living places. This would not represent the most efficient use of land. Management plans would be needed to ensure it does not become neglected.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various (A, B, A+C, B+C)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The most relevant criterion that may be applicable to these options is **criterion 5. Inequalities**, as their implementation may have an impact on the quality of living spaces, which can often serve as an indicator of levels of poverty and social exclusion.

Depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. greening, accessible services/facilities, resilience to climate change etc). **Criterion 3. efficient use of land**, may be relevant as there may be implications for design of buildings and site layout. Overall, the likely sustainability impacts are not expected to be significant and not complex enough to warrant a detailed appraisal.

Outdoor Amenity Space – Policy HD13

The preferred approach is to take forward is **option A**. A key objective for the plan is that housing tenures and types are of the highest quality possible and most conducive to promoting the health and wellbeing of occupants. To secure these objectives in a way that is suited for monitoring and enforcement, following the nationally described space standards which have universal familiarity and application.

Policy Options Set 010e (Draft Policy HD14): Accessible and Adaptable Homes

Housing provision across the city needs to ensure that it meets the needs of everyone whatever age and stage of life. Homes need to be built with the flexibility to be adapted to the changing needs of residents. These changes include adaptations in the size and compositions of households, helping successful intergenerational living, with adult children and older parents moving back into the family home and an ageing population. Providing opportunities for residents to maintain their independence is very important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs.

Table 7.5 - Policy options set 010e: Accessible and Adaptable Homes

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek to ensure that a % of affordable homes and market homes (dependent on needs, viability and practicality but currently 100% affordable and 15% market) are constructed	This approach future proofs the housing stock.	The standards can be too onerous and impact upon site viability.

to accessible and adaptable homes standards set out in Part M4(2) and M4(3) of the Building Regulations. For M4(3) for Social Rent these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation.		
Option b Introduce specific exceptions to the requirement for accessible and adaptable homes for practical reasons, for example provision of lifts is disproportionately expensive for flats of less than three or four storeys or for a small number of flats (fewer than 10) sharing one lift core, so upper floors would not need to conform.	Rather than lowering the percentage generally to ensure accessible/adaptable homes are achievable in all situations, this allows a generally high percentage, whilst avoiding situations where there are practical reasons that limit the amount of accessible and adaptable homes that can be provided.	This may encourage low-rise flats, or one bed houses, to circumvent the policy, which may often not be the most efficient use of land or the most suitable design for the area.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	Rely on the NPPF to deliver the policy framework for delivering accessible and adaptable homes.	This could result in homes being built that are not sufficiently adaptable to the changing requirement of residents which is not an effective approach to meeting residents both current and future needs. Retrofitting houses to meet needs in the future is more costly and an inefficient use of resources.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options (A, B, A+B, C)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The options most directly influence **criterion 5. Inequalities** but depending on the implementation of the options, they are likely to impact other criteria in the SA framework indirectly where these have a relationship to healthy design (e.g. accessible services/facilities). Option a and b are likely to have a minor positive impact on inequalities as there is an explicitly requirement for development to integrate accessibility and adaptability in their designs. Option c is likely to be neutral, as compulsory national policy requirements are likely to apply in most circumstances - particularly building regulations. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Accessible and Adaptable Homes – Policy HD14

The preferred approach is to take forward is a combination of **options A and B**. This approach would ensure that a sufficient amount new additions to the city's housing stock is future proofed in line with the projected demographic trends for the aged population and the current needs of residents with mobility issues. Option B in particular will allow the policy to be sufficiently flexible for situations where accessible/adaptable homes are difficult to achieve for practical reasons while ensuring a sufficient amount is still delivered.

Background paper 011

Title: Urban Design, Placemaking, Heritage and Archaeology

This paper addresses: Principles of high-quality design, the historic environment of Oxford including designated heritage assets.
Relevant Local Plan Objectives: • Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. • Protect and enhance our valued and important heritage.
SA Objective(s): 11. To promote good urban design through the protection and enhancement of the historic environment and heritage assets while respecting local character and context and promoting innovation.
SEA theme(s): Cultural heritage, landscape.

1. Introduction.....	3
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal).....	3
The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance (PPG)	3
National Design Guide.....	5
Listed Building Act	5
Oxford Local Plan 2036.....	5
Other relevant plans/programmes/strategies	6
Conservation Area Appraisals	6
Assessment of the Oxford View Cones (Oxford City Council).....	6
High Buildings Study (LDA, 2018).....	7
Cowley Branchline Densification Study (LDA, 2025)	7
A Character Assessment of Oxford in its Landscape Setting (LUC, 2002) and update Addendum Report (LUC, 2022).....	7
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	8
Context of the city.....	8
Historical context and heritage assets in the city.....	9

Encouraging high-quality urban design	11
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	12
5. Key Issues addressed through the Local Plan 2045.....	13
Introduction	13
Overall approach to different types of historic assets	13
Promoting the principles of good design	14
Appendix A – Regulation 18 Policy options sets	16
Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets.....	17
Designated Heritage Assets – draft policy HD1, HD2, HD3, HD4.....	19
Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets	19
Non-designated Heritage Assets – draft policy HD5.....	21
Policy options set 011c (draft policy HD6): Archaeology	21
Archaeology – draft policy HD6	24
Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings	25
Principles of high-quality design of buildings – draft policy HD7.....	27
Policy options set 011f (draft policy HD9): Views and Building Heights.....	27
View Cones and High Buildings - draft policy HD9	30
Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features.....	30
Bin and Bicycle Stores and External Servicing Features – draft policy HD15.....	33

1. Introduction

- 1.1 The importance of high quality design in creating places where people feel safe and rooted and want to be is well recognised. Good design can create or enhance unique character, but is also about functionality, helping to make a place that is attractive for walking and cycling, that feels safer from crime and vehicle traffic and can help stimulate social interaction. Good design means resources are used more efficiently and maintenance costs are reduced. Good design is also linked to health and wellbeing, making space for nature, as well as building resilience to climate change.
- 1.2 Understanding of existing character, whether that is from natural or built features, is the starting point of creating good design. Strongly linked to that is identifying and understanding heritage assets. Heritage assets are strongly protected in national policy. In recent years there has been a subtle change in national policies that require the significance of heritage assets to be weighed up against the potential benefits of new development. There is also an increased understanding of the wide range of things that contribute to the importance of heritage assets, which includes the significance placed on them by local people.
- 1.3 The Council has a duty to protect and enhance historic environment through the Local Plan, this is important for delivering sustainable future for city. The historic environment is important for supporting wellbeing and economic growth too, particularly in Oxford, where it acts as a significant draw for tourists globally every year and helps to contribute to the special character of the city. Protections for the historic environment are not about ensuring no development happens to them full stop, instead the focus is on managing change so it happens in right way so we preserve historic environment for benefit of future generations.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

The National Planning Policy Framework (NPPF) 2024 and Planning Practice Guidance (PPG)

- 2.1 The NPPF (2024) places significant weight on good design as a means of bring about sustainable development, creating “better places”, and bringing about development that is suitable and appropriate for the communities where it takes place. Paragraph 135 sets out how planning policy and decisions should ensure that development:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and*

effective landscaping;

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

2.2 There is the expectation that design policies are developed alongside local communities in order to reflect the aspirations and defining characteristics of the local area (paragraph 132). The NPPF further requires that the greatest possible amount of clarity on what is expected with respect to design outcomes and requirements is facilitated as early as possible in the development process (para 126). It promotes the use of tools such as design guides and codes within instruments like local plans and supplementary planning documents to create a framework setting design standards and requirements, with the level of detail or prescription tailored to the specific setting.

2.3 Continued engagement during the development of emerging individual schemes is also encouraged, with the onus placed on local authorities and to some extent applicants/developers to ensure early local involvement in the evolution of schemes (paragraph 132). Local authorities are expected to be proactive in using methods such as design reviews, workshops and assessment frameworks such as Building for a Healthy Life to ensure design quality (paragraph 138).

2.4 Paragraphs 202 to 221 of the NPPF contain policies specific to the historic built environment and heritage assets. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance.

2.5 Heritage significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence, but also from its setting.

2.6 'Great weight' is to be given to conservation and clear and convincing justification is required for all grades of harm, including through change to the setting. Justification must be on the grounds of public benefits that outweigh that harm (paragraphs 208 and

209). Public benefits will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations. In order to make a sound decision, a planning authority needs to understand from the applicant the significance of any heritage asset affected (paragraph 211). This may require some investigative work, but the information to be supplied with the application should be proportionate to the asset's importance and the potential impact.

National Design Guide

- 2.7 The [National Design Guide](#) (updated January 2021) is a material consideration and forms part of national planning guidance setting out the characteristics of well-designed places and demonstrating what the government considers good design to mean in practice. The guide outlines and illustrates ten characteristics of good design falling under the topics of Climate, Character and Community. The characteristics range from context, identity and built form, through to nature, public space, movement, and the uses on the site including homes and buildings, the resources used to construct them and their life span. Each is discussed in detail in the guide but are illustrated in the circular diagram in Figure 2.1.

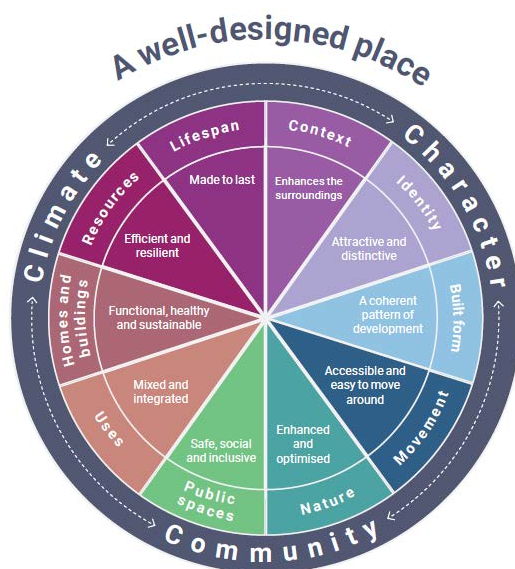


Figure 2.1 - Ten characteristics of good design (DCLG National Design Guide 2021)

Listed Building Act

- 2.8 The Planning (Listed Buildings and Conservation Areas) Act 1990 provided listed buildings and conservation areas with additional protections relating to the granting of planning permission. It created special controls for the demolition, alteration or extension of buildings, objects or structures of potential architectural or historic interest.

Oxford Local Plan 2036

- 2.9 Existing policies from the Oxford Local Plan 2036 are working to protect the historic environment in Oxford. The design and conservation policies can be found in Chapter 6 ‘Enhancing Oxford’s heritage and creating high quality new development’. The plan promotes high quality design and placemaking through Policy DH1:

Policy DH1: High quality design and placemaking

Planning permission will only be granted for development of high quality design that creates or enhances local distinctiveness.

All developments other than changes of use without external alterations and householder applications will be expected to be supported by a constraints and opportunities plan and supporting text and/or visuals to explain their design rationale in a design statement proportionate to the proposal (which could be part of a Design and Access Statement or a Planning Statement), which should cover the relevant checklist points set out in Appendix 6.1.

Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development as set out in Appendix 6.1.

- 2.10 In order to protect Oxford's unique historic environment described above, further policies in Chapter 6 include:

- Policy DH2: Views and building heights
- Policy DH3: Designated heritage assets
- Policy DH4: Archaeological remains
- Policy DH5: Local Heritage Assets
- Policy DH6: Shopfronts and signage
- Policy DH7: External servicing features and stores

Other relevant plans/programmes/strategies

Conservation Area Appraisals

- 2.11 Appraisals have been written for a number of our conservation areas, some of which are currently being updated. These documents detail the locations and characteristics which contribute to each area’s architectural or historic importance, as well as opportunities for enhancement. They are available to view on the conservation webpages under [conservation areas](#).

Assessment of the Oxford View Cones (Oxford City Council)

- 2.12 View cones are drawn as triangles from important viewing points to encompass the width of the area containing buildings that constitute Oxford’s historic skyline. A View Cones Assessment has been prepared to examine the significance of views, identifying their special qualities. The View Cones Assessment sets out a methodology for heritage

assessment of the Oxford views and applies this to each of the view cones. It describes and analyses the important features of the view cones. The study enables a greater understanding of the significance of all parts of the view cones, i.e. not just the skyline. It is designed to aid understanding of the impact of proposals on views.

- 2.13 The 10 identified view cones do not represent an exhaustive list of viewing points that provide an important view of Oxford's skyline. There may be glimpses of the famous skyline in other locations, and tall buildings in particular that are proposed outside of the view cones might still have an impact on the historic skyline.

High Buildings Study (LDA, 2018)

- 2.14 The High Buildings Study is in two parts-the Evidence Base Report and the Technical Advice Note. The Evidence Base Report (EBR) summarises the current 'baseline' of Oxford and has utilised mapping and 3D city wide modelling. The 'baseline' analysis looks at townscape character areas, how the city is structured such as through identifying the location of the city centre, district centres, and the main transport routes, as well as the current nature of building heights across the city. The EBR looks at the geographical distribution of heritage assets within the city and the ways in which setting contributes to the heritage significance of these assets and their potential to be affected by high buildings. The EBR also considered where future growth in the city is planned or may be anticipated. The EBR concludes by identifying 'Areas of Greater Potential' for high buildings. These are areas that are relatively unconstrained by heritage considerations and also represent opportunities for high buildings such as at district centres and transport nodes. The Technical Advice Note (TAN) is a guidance document that supports policy within the Local Plan 2036 and aims to shape the growth of Oxford positively.

Cowley Branchline Densification Study (LDA, 2025)

- 2.15 The intention of this study is to give guidance to guide the opportunities for growth and regeneration within this Area of Focus. This includes opportunities that may arise from the planned investment in the Cowley Branch Line and associated walking, cycling and public transport connection to the stations from existing and future residential and commercial neighbourhoods. The study aims to guide development so that it extends the compact and mixed-use development of Oxford's core and district hubs to within the area of change, limiting sprawl and inefficient use of land, and maximising connectivity and availability of facilities and services.

A Character Assessment of Oxford in its Landscape Setting (LUC, 2002) and update Addendum Report (LUC, 2022)

- 2.16 The report was commissioned in recognition of the importance of the city's landscape and townscape and the changes it faces. The assessment looks at the component parts of the city, including its villages and neighbourhoods, and their individual characteristics

which make up the city as a whole. It considers the historic, cultural and architectural associations, open places, wildlife and natural habitats and perceptual characteristics that combine to create Oxford's sense of place. The study helps in understanding which open spaces in the city are important in landscape terms, which areas of the city are sensitive to change and merit protection and opportunities for enhancement.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Context of the city

- 3.1 Key to Oxford's character is the fact that it is located in a floodplain overlooked by surrounding ridges, which create a backdrop to the 'dreaming spires'. These ridges provide an important backdrop to Oxford's cityscape. Oxford's setting is defined by agricultural vales to the north and south, wooded hills to the east and the west and river valleys extending through the urban core of the city. The river corridors running either side of Oxford's historic core are also an essential part of its special character and landscape setting.
- 3.2 Oxford's character is also defined by its unique built environment. The iconic skyline and architecture produced by the limestone colleges and towering spires create a world famous urban environment. As set out in the Oxford Local Plan 2036: *"It is important that design choices about building heights are informed by an understanding of the site context and the impacts on the significance of the setting of Oxford's historic skyline, including views in to it, and views within it and out of it. Taller buildings will be possible in many locations, but they must be designed to ensure they contribute to the existing character, and do not detract from the amenity of their surroundings."*

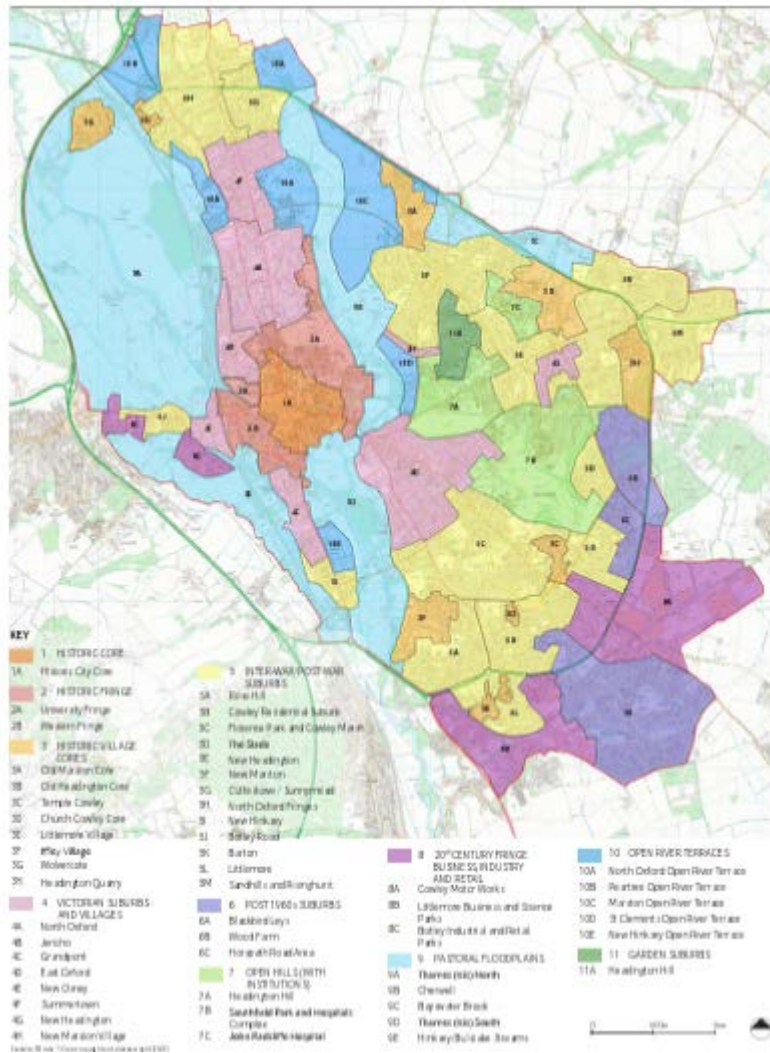


Figure 3.1 - Landscape character areas of Oxford as identified in the Character Assessment of Oxford in its landscape setting and updated using research for the Heritage Assets Register Project

Historical context and heritage assets in the city

- 3.3 Oxford contains buildings spanning every major period of British architectural history from the 11th century onwards. Oxford's extensive history of settlement and cultural significance has contributed to a wide array of statutory designations across the city which are of national importance for ongoing protection for the benefit of future generations. The city hosts around 1,500 listed buildings, with the proportion of grade I and II* as a total of all listed buildings being more than twice the national average. Statutory listing protects both the inside and outside of a building, as well as fixtures and fittings (like windows, doors or staircases) and subsidiary buildings that form the 'curtilage' of the building. Alterations can only be made to a listed building if the Local Planning Authority (LPA) grants Listed Building Consent for any changes that might affect the special architectural or historic interest of the building.

3.4 There are 18 Conservation Areas designated across the city at present³. Conservation area designation is afforded to areas to identify that they have special architectural or historic interest that makes them worth protecting and improving. They include a diverse range of qualities from the compact college environment found in the city centre, the open green space found in the Headington Hill Conservation Area, to the vast meadows in Wolvercote and Godstow. Architectural styles and landscape qualities are diverse, but they all have the common element of containing features that contribute to our historic past. Oxford's Conservation Areas are as follows:

- Bartlemas
- Beauchamp Lane
- Binsey
- Central (University and City)
- Headington Hill
- Headington Quarry
- Iffley
- Jericho
- Littlemore
- North Oxford Victorian Suburb
- Old Headington
- Old Marston
- Osney Town
- Oxford Stadium, Sandy Lane
- St Clement's and Iffley Road
- Temple Cowley
- Walton Manor
- Wolvercote with Godstow

3.5 In addition to Listed Buildings and Conservation Areas, there are other important national heritage designations in the city including 10 scheduled monuments and 15 Historic Parks and Gardens which form an important component of the wider green infrastructure network.

3.6 Aside from national designations summarised above, there are a number of locally designated assets which have been identified on the [Oxford Heritage Asset Register](#). This is a register of buildings, structures, features or places that make a special contribution to the character of Oxford and its neighbourhoods through their locally significant historic, architectural, archaeological or artistic interest. Locally listing does not establish the same level of protection as national listing in of itself.

3.7 Beyond these formally registered local assets, the city then also hosts a large number of traditional buildings (e.g. those built prior to modern methods of construction that arose in the 20th century) which also contribute to the wider character of Oxford. These other

buildings may still benefit from special qualities or features that are characteristic of older construction/architectural styles which warrant protection where possible, and may also require more careful approaches to redevelopment that reflect the unique ways these buildings function (e.g. passive ventilation) compared with modern buildings built today.

- 3.8 Three of Oxford's heritage assets are currently on Historic England's Heritage at Risk Register, which identifies sites most at risk as a result of neglect, decay or inappropriate development. These are the Church of St Thomas the Martyr, St Thomas Street (condition poor, priority category D - slow decay; no solution agreed), Minchery Farmhouse (condition poor from slow decay, no solution, priority C), and Church of The Holy Family, Blackbird Leys (condition very bad, priority A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed).
- 3.9 The features below ground also make an important contribution to Oxford's rich heritage and the city has a rich archaeological abundance comprised of features that were deposited at various points in the past from prehistoric times to the modern day. The unique archaeological heritage of the city encompasses a wide variety of asset types. Notable assets include prehistoric domestic, ritual and funerary sites located across north Oxford and the remains of an important Roman pottery manufacturing industry to the south and east of city. The town is also distinctive for its middle-late Saxon urban remains, its emergence as a major cloth trading town in the Norman period and for the numerous assets associated with Oxford's development as an international centre for academic study including the remains of multiple religious institutions, academic halls and endowed colleges. Other assets of particular note include the town defences, the distinctive remains associated with the medieval Jewish Community and the Royalist Civil War defences.

Encouraging high-quality urban design

- 3.10 Oxford continues to develop exciting new buildings at the forefront of modern architectural design. 4 of the 13 2021 RIBA south award winners were new buildings in Oxford, 6 of 13 in 2022, 3 of 11 in 2023, 2 of 6 in 2024 and 2 of 6 in 2025. Many of these award winners are within the historic core of Oxford and respond sensitively to that context, whilst successfully achieving modern and functional design that meets its brief.
- 3.11 Oxford City Council have been running the Oxford Design Review Panel (ODRP) for over 10 years. It is run in house by the Urban Design team with a highly experienced panel of 40 members. Design Review is an independent and impartial evaluation process conducted by a panel of built environment experts and was set up to ensure that there is a consistently high standard of design for significant built environment projects. It aims to embed best practice in urban design into the planning process. The panel promotes high quality design to help create better buildings, streets and public spaces in the city and all major development proposals are encouraged to engage with ODRP before a planning application is submitted.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 There is an on-going development pressure on historic assets and this is likely to remain the same over the coming years. However, a strong suite of historic environment policies remains in place within the Oxford Local Plan 2016-2036. There are areas where fairly significant amounts of development area expected, and these have 'Area of Change' policies within the Oxford Local Plan 2036, intended to help manage change within these areas.
- 4.2 The factors that enable the development of successful new buildings that are modern yet integrated are varied, and many will remain. The existing Local Plan policies such as DH1 ensure the design of proposals responds to its context from the start of the process and that sufficient information is submitted to allow a thorough understanding of the design implications. After 2036, Policy DH1 will no longer be a current policy and the NPPF will be the framework under which planning applications are determined. Although the proposed changes to the NPPF appear to reflect a move towards greater emphasis on 'beautiful' design, this would still lack the detail and specificity which is reflected in local level policies, particularly in a city like Oxford.
- 4.3 In addition to well-designed buildings, it is attention to walkability, landscaping, layout and availability of services that are vital to a positive experience of a place, wellbeing and health. The Oxford Local Plan 2036 identified areas of change. Without a new plan these areas of change may not provide guidance for the right areas.
- 4.4 Local level policies are able to focus on a level of detail which applies to the specific setting of the local area, for example Policy DH2 of the Oxford Local Plan 2036: Views and building heights, relates specifically to Oxford's view cones and its iconic skyline. In the absence of this local specificity in planning policies, there would be greater risk that the level of detail which the city needs in order to protect Oxford's uniqueness would be lost.
- 4.5 One of the legacies of the COVID-19 pandemic and the response to it has been a change in the way that people use the public realm, arguably engendering a greater appreciation of what is, and is not, on one's doorstep. There are clear links between urban design and health and wellbeing, and it is more important than ever that places are designed with an awareness of the impacts on these. In times of social distancing, design can also help reduce perceptions of risk. Designs that allow for safe social interactions and that help to instill a sense of community are very important. This means places designed to give space for people to interact safely and to feel comfortable in, with access to nature and opportunities for outdoor recreation and with an emphasis on designing spaces for people, not cars.

- 4.6 The risks from climate change, such as milder, wetter winters and hotter, drier summers, will impact everyone in Oxford. Design should respond to the challenges of climate change. Buildings will need to help adaptation to climate change, for example by being well insulated and naturally ventilated to deal with potentially hot summers, reducing the risks and damages of flooding events, ensuring biodiversity is maintained, ensuring there are green spaces to absorb rainwater and reduce flood risk, and to provide natural shade in the summer.
- 4.7 In terms of our contribution to climate change, the running of buildings is responsible for 81% of carbon emissions of Oxford, 29% of the total being from the running of residential dwellings². In Oxford there is a careful balance that needs to be struck between preserving heritage value and retro-fitting buildings to reduce their carbon contributions. However, we take as a starting point that historic buildings are inherently sustainable. The inherent embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) of historic buildings means that their retention and care is consistent with modern concepts of sustainability and with the ambitions of reducing carbon emissions. The 'whole building approach' seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

5. Key Issues addressed through the Local Plan 2045

Introduction

- 5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. In some cases the review of the options has resulted in changes to the names or references of the policy taken forward to the 2045 plan. The running order of the policies in the plan may also have been amended from the Regulation 18 stage.
- 5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Overall approach to different types of historic assets

- 5.3 At Regulation 18 stage, the preferred option was for the plan to include a suite of policies separately addressing each type of designated heritage asset were proposed in order that the nuances of the local context relevant to each can be more clearly conveyed.

Following the consultation, it was noted that while the historic environment of Oxford is of particular national significance and uniqueness, the proposed policies directly reflect national policy approaches with no deviation of note. Although not having policy could not be justified because of the unique environment, it was considered that that the best approach for the Plan would be to have a consolidated policy that addresses all relevant types of heritage asset within the city – to avoid unnecessary repetition and facilitate conciseness. Nuances and specifics on the local context can be captured in the policy supporting text or within site allocation policies as required.

- 5.4 There are a number of locally significant heritage assets which the Local Plan also sets out protections for through policy HD4. These non-designated heritage assets may or may not be identified in the Oxford Heritage Asset Register but still have a local relevance that, whilst not being of merit for national-level designation, is still important for supporting the wider character of the city. The policy protection afforded to these assets is not as strong as national designated assets but sets out requirements for mitigating impacts and avoiding their loss in line with the level of significance that they are deemed to warrant.
- 5.5 There is a significant archaeological presence across the city as was flagged earlier in the paper, and where possible it is important that this is preserved from loss through inappropriate development. At times, information is limited to there being knowledge of potential for archaeology only, thus the policy seeks to ensure that where necessary applicants undertake the appropriate investigation to identify any potentially valuable finds and undertake suitable mitigation to prevent their loss. In particular, the policy flags the City Centre Archaeological area as an area with known high concentrations of archaeology.

Promoting the principles of good design

- 5.6 National guidance on good design is clear that heritage considerations are an important contextual factor which should inform good design, and as such the Council is keen to ensure that these are factored into the design process for development in Oxford. The Local Plan includes an overarching design policy (policy HD1) which sets out principles of good design for Oxford including requiring applicants to utilise the design guidance held within the appendix to ensure a comprehensive approach to design of new development. This design guidance includes a checklist to prompt applicants to take appropriately address the relevant design considerations within the design rationales for their schemes.
- 5.7 The emphasis of the assessment will be on a design process that is clearly explained and justified, and a demonstration that the proposed development is one that works well for its intended uses and is responsive to the immediate and wider context.

Appendix A – Regulation 18 Policy options sets

- A number of potential topics for policies derive from the analysis set out in the previous sections. These will be important for delivering upon the various Local Plan 2045 objectives that seek to ensure that development at all scales in the city is of the highest design quality, and that Oxford's visual character and street scene, and its unique skyline and views in and out of the city are preserved and enhanced.
- The Local Plan 2045 therefore includes proposed policies to address aspects both protection and enhancement of different elements of the historic environment as well as a number of policy areas seeking to guide applicants towards high-quality design.
- For each potential policy, options for the specific approach that could be taken for the Local Plan 2045 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.
- Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). A summary of this screening process is included at the end of each options set table.

Policy options set 011a (draft policies HD1, HD2, HD3, HD4): Designated Heritage Assets

- A cornerstone of good design is about ensuring proposals are informed by an understanding of existing context and designed to respond to this positively. In Oxford, a key part of this context is defined by the presence of heritage assets, and many of these have been designated for their national and local importance. There are a variety of designated assets in the city, from conservation areas and historic parks/gardens, to listed buildings and scheduled monuments, and their protection is not only about the features of the assets themselves, but often also about their wider setting.

Table A.1 - Policy options set 011a: Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a set of policies relating to designated assets that reflects the NPPF (including Conservation Areas, Listed Buildings, Registered Parks and Gardens, and Scheduled Monuments), that set out how impacts on designated heritage assets will be assessed, when mitigation is required, and how harm should be balanced against benefits, including Oxford-specific detail in relation to what harm and benefits may be for different types of assets in Oxford/in different parts of Oxford.	This could set out Oxford-specific considerations, giving local detail to the direction of the NPPF and helping to ensure local context is considered in proposals and decision making. It gives more clarity for applicants.	A list of potential harms and benefits in Oxford could never be definitive and will not precisely fit all situations. It is important it does not take over from case-by-case consideration based on specifics of the case.
Option b Include a policy or set of policies for designated heritage assets (e.g. listed buildings, conservation areas) that reflects the NPPF but does not include	Ensures that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist.	Policy wording covers a lot so is long and can be unwieldy to read through and understand. This approach relies on overarching principles that may not address specific design issues. The policy would not have to include all

Oxford-specific detail in relation to harm and benefits.		designated assets, for example there is not scope for a policy that does much more than repeat national guidance in relation to scheduled monuments and important parks and gardens. Generally, this approach of largely repeating national guidance is unnecessary.
Option c No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on delivering well-designed places, which it is not necessary to repeat.	It might be difficult to ensure proposals reflect Oxford context, risk of non – compliance with NPPF by not having more specific policies.

Initial sustainability appraisal of options sets

Is there only one option or are there various options we could take? A or b or c

High-level screening conclusion? the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? No

Rationale:

These options are about protecting designated heritage assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and b prioritise the protection of Oxford's designated heritage assets, ensuring the assessment, prevention or where necessary mitigation of harm. Option c would provide no local steer on the protection of designated heritage assets, but rely on national policy and guidance.

The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option c would have a more neutral impact as it would rely on national policy. There is no direct national policy,

but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Designated Heritage Assets – draft policy HD1, HD2, HD3, HD4

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.
- As such the preferred option is option A. A suite of draft policies is proposed, that explain how the NPPF approach should be applied to different types of designated heritage asset, and which includes more detail than the NPPF and will enable the supporting text to include Oxford-specific information. This will help ensure Oxford's designated heritage assets are understood and responded to appropriately in the planning process.

Policy options set 011b (draft policy HD5): Non-Designated Heritage Assets

- There are several historic buildings and other assets which do not meet the requirements for protection of a national designation, but which are of importance to the city for their locally significant heritage values. Oxford City Council maintains a list of local heritage assets known as the Oxford Heritage Asset register (OHAR). The OHAR provides the opportunity to identify those elements of Oxford's historic environment particularly valued by local communities. Locally important heritage assets can be added to the list when they are identified, if they meet the criteria. The current policy ensures that heritage assets of local importance will be a material consideration when determining planning applications. Buildings and structures on OHAR are not given any statutory protection from demolition.

Table A.2 - Policy options set 011b: Non-Designated Heritage Assets

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach

Option a Include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for assessing whether an asset has locally important heritage interest, and how to identify non-designated heritage assets.	This is very helpful in adding clarity and highlighting the importance of local assets and ensuring something of their significance is reflected in new proposals.	There is a risk the list could be seen as definitive, and it is then considered that anything not on the list has no heritage value.
Option b No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF has specific direction on local heritage assets, so it is not necessary to repeat it and that would aid conciseness of the Plan.	It might be difficult to ensure proposals reflect Oxford context, or to argue that something is a heritage asset if it is not clear that they are considered important in Oxford and what the criteria for defining them is.

Initial sustainability appraisal of options sets

Is there only one option or are there various options we could take? A or B

High-level screening conclusion? the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? No

Rationale:

These options are about how to protect local heritage assets in a manner appropriate to their significance. Option a would add clarity and highlight the importance and significance of such assets within a local context, whereas option b would rely solely on national policy and guidance.

Option a would score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the option would also require new design to mitigate against any potential harm, and respond to local context. Option b would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good

design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Non-designated Heritage Assets – draft policy HD5

- The preferred approach for the Local Plan 2045 policy is to have a local policy that elaborates on the NPPF approach to non-designated heritage assets. The policy approach needs to align with the NPPF, but by including a policy there is the opportunity to reference the Oxford Heritage Asset Register and also to reiterate how non-designated heritage assets may be identified.
- As such the preferred option is option A. A draft policy is proposed that sets out how non-designated heritage assets will be considered, which is in accordance with the NPPF. In addition it sets out routes by which a non-designated heritage asset may be identified.

Policy options set 011c (draft policy HD6): Archaeology

- Just as with its built environment, Oxford has a rich archaeological heritage that has been progressively built up from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. New development presents opportunities to unearth and discover new archaeological remains which need to be fully realised, equally, it has the potential to harm or destroy these assets where their presence is not appropriately investigated, and impacts are not carefully mitigated.
- The policy options are intended to address the presence of archaeology, our preferred approach is to continue to define the City Centre Archaeological Area and require a holistic management plan for the colleges which are areas of known archaeological significance whilst also flagging those important features could be found elsewhere in the city. Where features could be present, we would require appropriate assessments and information gathering that can define character, significance and extent of any deposits so that these are not missed or lost. We would also positively support proposals which are designed to enhance or to better reveal the significance of the asset.

Table A.3 - Policy options set 011c: Archaeology

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the City Centre Archaeological Area. For all sites where archaeological deposits or features are suspected, require the incorporation of sufficient information to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant.	There are known to be archaeological deposits of significance across the whole city centre area, so defining this area to flag this up front and ensure assessments are carried out from the start of the process would help to bring certainty. This sets out from the start exactly what is expected which aids certainty for developers.	By defining an area there is a danger that areas outside of this will not be considered from the outset for their potential archaeological importance. To mitigate this a policy would also need to ensure it was made clear that there is potential for archaeological deposits across the city. This adds length and detail to the policy.
Option b Require a holistic management plan for key historic college owned and occupied sites in the City Centre Archaeological Area when development is proposed. These should take a holistic view of the whole college site and should consider features that should guide the location of new development within the site, including best location for basements in terms of impacts on archaeology (and cumulative impacts).	Colleges sites are almost certain to have archaeological interest, as well as being long-term owners with extended interest in their significant sites, which they are custodians of. Where developing in an area with such significant archaeology it is important that development is considered holistically and located in the best way within a site.	This does require up front work from the colleges.
Option c Where proposed development would impact on archaeological or	This follows the NPPF approach so adds clarity that this would be expected. If the other parts of the	This adds length and detail to the policy which may not be necessary as

paleoenvironmental features and deposits, it will only be supported where the harm to such deposits and features can be eliminated or where, by agreement, mitigated to an appropriate level, conserving the remains and the significance of the archaeological or paleoenvironmental asset better revealed and understanding of that significance enhanced (by agreed measures).	NPPF approach are to be in a policy tailored to Oxford then it would be confusing not to include this also.	it is at least partly covered in the NPPF.
Option d Map more areas as archaeological areas where it is known there are likely to be deposits/not allocate sites where archaeological deposits or features are expected to be present and require heritage assessments with potential desk-based assessments if needed.	There are other known areas of deposits, although none to the extent of the city centre. We could define these on the policies map to help flag the high likelihood of deposits in these areas, which would ensure they weren't overlooked and would add certainty for developers from the start of the process.	This risks suggesting that areas that aren't mapped are unlikely to have deposits. It might be safest to rely on initial investigations for individual sites as they come forward, which can be done in advance for allocated sites.
Option e Do not include a policy about archaeology but rely on national policy instead.	This avoids any repetition with national policy and keeps the plan focused on things that are not already covered in national policy.	Given the importance of the heritage of Oxford and its rich archaeological record it should be highlighted in the local plan. Having no specific policy would miss the opportunity to highlight this importance from the start or to tailor the policy approach to Oxford.

Initial sustainability appraisal of options sets

Is there only one option or are there various options we could take? A, b, c, d, or e, or a combination of a, b, and c
High-level screening conclusion? the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? No

Rationale:

These options are about protecting archaeological and paleoenvironmental assets, to ensure that the significance of valued and important heritage is conserved and that understanding of the value and importance is enhanced. Options a and c would have a positive impact, options b and d do not directly apply restrictions and therefore are more likely to be neutral on their own. Option e does not provide local context, but relies solely on national policy and guidance.

The options would all score positively against criteria **11. Good urban design and the historic environment** by seeking to protect and conserve existing heritage assets that contribute to the wider environment of the city. Additionally, the options would also require new design to mitigate against any potential harm, and respond to local context. Option e would have a more neutral impact as it would rely on national policy. There is no direct national policy, but it does promote good design. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Archaeology – draft policy HD6

- The preferred approach for the Local Plan 2045 is to have a local policy that defines the city centre archaeological area and that also provides guidance for when archaeological deposits are impacted. The city centre area has such a wealth of deposits, that it is almost a certainty that development will impact on them. Therefore, it is worth being upfront and setting out the starting point that deposits are likely to be found. The sets out a clear expectation that there is efficient use of land in all schemes. The policy sets out criteria to be considered in determining a site's capacity, following the same approach, but applying that to specific heritage types, and also adding additional guidance in the policy where relevant and Oxford specific information in the supporting text. Given the significance of heritage in Oxford, it is important that the local plan contains a suite of heritage policies to enable application of the NPPF approach in Oxford, with a detailed expectation of requirements.
- As such the preferred option is option A combined with Option C.

Policy options set 011d (draft policy HD7): Principles of high-quality design of buildings

- High quality design needs to show a good response to its surroundings as well as considering how buildings and spaces interact and function. From the materials selected to build a structure, to the provision of green open space, layout of pedestrian routes and provision of shops/amenities, design of places needs to take account of and balance many considerations in order to be successful.

Table A.4 - Policy options set 011d: Principles of high-quality design of buildings

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy that requires high quality design and include a checklist to set out key principles of what this means in detail (including principles for materials, layout, potentially secure by design, etc.), requiring that the Design and Access statement or other submission alongside the planning application covers the relevant aspects of good design. Exempt householder applications and changes of use without external alteration from needing to include answers to the relevant checklist questions in their submission.	Would help ensure that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Specific aspects of design addressed using checklist. Sets standards for high quality design for relevant schemes, reflects importance placed on creating distinct places in planning framework.	Types of development that checklist may apply to are limited e.g. householders and change of use not covered. Householder applications should still aspire to high design quality. Checklist can be generic, with overarching principles that may not address design quality issues affecting specific development types e.g. residential dwellings, hotels etc. The alternative is to expand the scope of checklists including becoming more prescriptive. Assessment of schemes may rely on some level of subjective judgement which might be point of contention with applicants and lead to drawn out negotiation and argument. May be onerous to apply and may require extensive officer time.

Option b Include householder applications and/or changes of use applications in the requirement to follow the checklist.	Even if there are no significant external changes of use, they may have an impact on the character of an area. Householder extensions also have an impact. Smaller applications are not necessarily simple and the cumulative impact of poor-quality design and a low expectation for householder applications can have a significant impact on the overall quality, character and particularly appearance of a place.	The impacts on design can be assessed without a checklist for these smaller applications. Many of the urban design principles will not be applicable to these or householder extensions. This approach could be quite onerous without necessarily adding significant value.
Option c include a generic design policy but be less specific e.g. have requirements for good quality design but do not rely on a checklist.	Potentially more flexibility for developers to bring forward compliant schemes and more quickly. Easy to compare requirements to NPPF and other authority baselines.	It might be difficult to ensure proposals reflect Oxford context.
Option d No specific policy, rely on NPPF requirements or National Design Guide as template.	NPPF update has more specific direction on delivering high quality design.	It might be difficult to ensure proposals reflect Oxford context, risk of non-compliance with NPPF by not having more specific policies.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Option a, b, c, or d High-level screening conclusion? the options are similar to each other from a sustainability perspective Screened in for detailed appraisal? No

Rationale: Options a, b, and c are all alternatives and generally cover how far a policy goes with setting design guidance/requirements (e.g. detailed checklist or more simple). Option C would be considered as an addition to either option a or b and would expand the types of applications it applies to.

In terms of sustainability impacts... Most directly the options would impact **criterion 11. Urban Design**, but depending on the implementation of the options, they are likely to impact other criteria in the SA framework also (e.g. sustainable construction, greening, health and wellbeing etc). Option d and E are likely to have a neutral impact, but options A and B are likely to have a more positive impact because they are more prescriptive and specific about what would be considered good design in the city, potentially, option A might achieve a significant positive for this reason. Overall, the sustainability impacts between the options are similar to each other from a sustainability perspective, it is not considered necessary to scope in for detailed appraisal.

Principles of high-quality design of buildings – draft policy HD7

- The preferred approach for the Local Plan 2045 is to have a local policy that requires high quality design and that links to a checklist that sets out what needs to be considered in order to demonstrate high quality design. This policy approach is not prescriptive, but does ensure a thorough consideration is given to all aspects of high quality design.
- As such the preferred option is Option A. Option B is very similar, but would also require use of the checklist for householder and change of use (with no external alterations). This is not justified, because the approach would not be proportionate to the scale of those developments. Option C or D would not provide sufficient design guidance.

Policy options set 011f (draft policy HD9): Views and Building Heights

- Oxford has an iconic skyline, which includes the ‘dreaming spires’, as well as several special views into the historic core which are detailed in the Oxford View Cones assessment. These features mean that the city is particularly sensitive to the impacts of taller buildings, and care needs to be taken over the design and placement of such development where it is proposed so that taller buildings do not negatively impact on views of the iconic skyline.

Table A.5 - Policy options set 011f: Views and Building Heights

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Continue to define the area within a 1,200 metre radius of Carfax tower as the Historic Core Area. This area contains all the buildings that comprise the historic skyline, so new developments that exceed 18.2m in height will intrude into the skyline. Require that any buildings above this height are limited and bulk, only thin, delicate and of the highest design quality, demonstrated by stringent appraisals to inform and explain design choices.	This option gives a nuanced approach to assessing heights, which aims to avoid harmful uniform heights but also ensure positive impacts. It does not prevent unwanted intrusion into the skyline because there is a rigorous process to prevent it, but it also still allows fantastic additions to the skyline.	Uniform heights can still occur. An element of judgement is introduced without a set height limit (even though a rigorous policy and process should prevent harm).
Option b Continue to refer to the High Buildings Technical Advice Note (TAN) (or an updated version) as the key evidence base for deciding appropriate heights, designing higher buildings and appraising applications.	The High Buildings TAN contains useful guidance specific to Oxford that helps positively shape design choices in relation to building heights. The guidance is already in place and has been used successfully to inform many applications and decisions.	The guidance can't itself prevent designs that are harmful to character and not justified and this would need to be in conjunction with other policy requirements. It will be necessary to make it clear that local townscape considerations still apply too.
Option c Continue to define view cones, which are the areas within a view from historic viewing places from where the 'dreaming spires' can be most clearly seen. Include a policy that requires	This approach has been successful over a long period of time. Although views of the spires may have altered over time because of growth of vegetation, there are not buildings in the view cones that prevent the viewing, enjoyment and understanding	The approach is limited to views from defined viewing points.

design within the view cones to avoid harming the views of the spires.	of the spires. These are long established as the key viewing points, and the protection, especially in combination with policies relating to the central area, has conserved the important views over time.	
Option d Include an absolute height limit in the city centre that does not interfere with the spires.	This would protect the views of the historic spires as they are.	An absolute height limit can be set lower than it potentially needs to be in order to make sure everywhere is low enough not to interfere with the dreaming spires. Any innovation or change is stifled. This approach can lead to uniform heights, leaving unwanted horizontal line that harms the foreground of views and the setting of historic assets and prevent the spires and towers to be properly discerned, detracting from their significance.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations of options e.g. option a, a+b, a+b+c, b+c+d High-level screening conclusion? the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: Of the options – option a does potentially allow higher buildings, meanwhile option d is a hard restriction in heights in the city centre. Option B is about making reference to the high buildings TAN to guide design considerations and option C is about incorporating view cones into a policy and including particular considerations in relation to applications within these zones.

In terms of sustainability impacts – key criteria these options are relating to is criterion 11. Urban Design/Historic Environment. All the options would likely have a positive impact for this criterion (at least in terms of supporting the historic environment). The options also potentially have an impact on criterion 12. Economic Growth, because option a is not a hard restriction, it is likely to have a neutral impact on economic growth. Option D is likely to be a negative impact. Option C potentially also has a minor negative impact for criterion 3. Efficient use of land – limiting heights potentially limits development options/density?

Overall, there are unlikely to be significant sustainability impacts from the options that would warrant testing through a detailed Sustainability Appraisal.

View Cones and High Buildings - draft policy HD9

- The preferred approach for the Local Plan 2045 policy is to have a local policy that sets guidance for what a high building is and sets criteria for guiding appropriate height and analysing impacts. The preferred approach is also to define an area within 1,200m radius of Carfax tower as needing very strong justification for any building over a set height. The preferred approach is also to continue to define view context. Taken together, these elements of the draft policy ensure that the important skyline is protected, but do also allow flexibility for well-designed schemes of height, with supporting guidance showing how to determine appropriate heights in different parts of the city.
- As such, the preferred option is a combination of a, b and c. An absolute height limit is not considered appropriate as it does not offer flexibility and could have other significant negative impacts, such as uniform height being introduced.

Policy options set 011g (draft policy HD15): Bin and Bicycle Stores and External Servicing Features

- It is important to ensure that new development is designed with appropriate consideration for bin and bicycle storage and also external servicing features. The Local Plan 2045 seeks to increase the uptake of cycling further to help Oxford achieve its ambitions of improving air quality, reducing congestion and encouraging healthy lifestyles. The Local Plan also seeks to ensure that bins and external servicing features are considered at the initial stages of the design process so they can be designed in

at an early stage rather than being considered as an afterthought which can result in negative impacts on the appearance and amenity of an area. The policies in Chapter 6 of the Local Plan include guidance on bin, bicycle storage and external servicing features whilst the policies in Chapter 7 include bicycle parking design standards.

- The policy options set out below include requirements for the design of these areas. There is also an alternative option of having no locally set policy on bin and bicycle storage and external servicing features.

Table A.6 - Policy options set 011g: Bin and Bicycle Stores and External Servicing Features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Requires that bin and bicycle stores and external servicing features should be considered from the start of the design process and set criteria to ensure they meet practical needs but do not detract from the overall design, that external servicing features are integrated into the design or positioned to minimise their impact and that high quality materials are used. Include compulsory requirements, setting out binding design codes depending on location, building type etc, and requiring fire-safe spaces with adequate electric supply for charging.	Applying a discrete policy ensures considered design of these areas and not just as an afterthought; it helps alignment with other objectives of plan e.g. encouraging active, sustainable travel; effective waste management etc. This can bring in a far greater level of clarity in terms of design requirements, ensuring high design quality, public amenity etc. There is less chance for this area to be overlooked or for poorer quality to be introduced by stealth or negotiation. There are many consistent key principles that can be written into policy, to raise the awareness of the need for good design of these areas from the outset, and to be consistent with increasing e-bike ownership, etc.	Adding further burden to developers in bringing forward schemes; may be too onerous to apply or enforce.
Option b		

No specific policy, rely on NPPF.	NPPF update has specific direction on delivering high quality design.	It may be difficult to ensure proposals reflect Oxford context; difficult to ensure consistent standards and design quality if proposals are always assessed on case-by-case basis; difficult to require a minimum level of servicing without policy.

Initial sustainability appraisal of options sets

Is there only one option or are there various options we could take? - Option a or Option b

High-level screening conclusion? - the options are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: Option a or Option b are alternatives to each other and represent the choice between having a specific local policy or not.

In terms of sustainability impacts, the two options relate to **criterion 11. Good urban design, criterion 8. to reduce traffic and associated air pollution and criterion 1. car emissions.** Option a would have a minor positive impact for all criteria above. It would help with urban design, potentially reducing the risk of bin storage being unsightly and could help encourage the use of active travel modes. Option b would have a minor negative impact as whilst there is national policy on delivering high quality design, this is not specific to the Oxford context and could result in poor quality design of either bin storage and/or cycle storage areas. Poorly designed cycle storage could deter the use of bicycle which could exacerbate congestion or air quality issues if people chose to travel by car instead. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Bin and Bicycle Stores and External Servicing Features – draft policy HD15

- The preferred approach for the Local Plan 2045 policy is to have a local policy that requires bin and bicycle stores and external servicing features to be considered at the outset of the design process. This will help to ensure a higher quality design. It would also help to meet other Local Plan 2045 objectives including encouraging active travel and effective waste management.
- As such the preferred option is option A. The draft policy includes a set of criteria that should be considered. Option B is to not have a bespoke policy but to rely on the NPPF. This may result in inconsistent standards of bin and bicycle storage provision, which may have negative implications including on the urban realm.

Background paper 012

Transport

This paper addresses: Oxford's circumstances around Transport and Movement
Relevant Local Plan Objective(s): • 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. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040 8. To reduce traffic and associated air pollution by improving travel choice, encouraging active travel, shortening journeys, and reducing the need to travel by car/lorry.
SEA themes: Air, Climatic Factors, Material Assets

1. Introduction.....	2
2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	3
Plans Policies and Programmes	3
National Planning Policy Framework (NPPF)	3
Regional Policy and Strategy	3
Local Transport and Connectivity Plan (LTCP)	4
Central Oxfordshire Travel Plan (COTP)	5
Oxfordshire Housing and Growth Deal	6
Department for Transport's Local Growth Fund and Homes England's Housing Infrastructure Fund (HIF)	6
Bus Service Improvement Plan (BSIP).....	6
Oxfordshire Rail Corridor Study	7
Oxfordshire Connect	7
Electric Vehicle (EV) Charging Strategy	7
Transport/ Traffic Modelling.....	8

Oxford Local Plan 2036.....	8
Corporate Plan	8
Oxford Climate Emergency	9
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	10
Motor Vehicle Parking	17
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)	19
5. Key issues addressed through the Local Plan	19
Introduction	19
Transport Assessments/Statements, Travel Plans and Service and Delivery Plans	20
Cycle and Powered Two Wheelers Parking	20
Motor Vehicle Parking Design Standards	21
Electric Vehicle Charging	21
Appendix A – Policy options and preferred approaches	22
Policy options set 012a (draft Policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans	22
Transport Assessments, Travel Plans and Service and Delivery Plans – Policy C6:.....	24
Policy options set 012b (draft Policy C7): Bicycle Parking Design Standards	24
Policy options set 012c (draft Policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards	27
Cycle and Powered Two Wheelers Parking Design Standards – Policy C7	29
Policy options set 012d (draft Policy C8): Motor Vehicle Parking Design Standards	29
Motor Vehicle Parking Design Standards – Policy C8	33
Policy options set 012e (draft Policy C9): Electric Vehicle Charging	33
Electric Vehicle (EV) Parking – Policy C8	35

1. Introduction

- 1.1 This paper focuses on Oxford's transport system. It provides a context for considering this subject by providing a brief summary of the relevant national and local plans, policies and

programmes that currently exist and will influence change in the future. There is a section on the current situation which includes some key information about existing and emerging strategies. As part of an assessment of the current situation some of the key challenges and future trends that are likely to impact on the transport system are identified. The next section explores what would happen without a new Local Plan and the potential difficulties that the city would face in terms of transport and connectivity. Finally, it discusses what the emerging Local Plan 2045 could do to meet the objectives of both existing and emerging policies and strategies.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

Plans Policies and Programmes

National Planning Policy Framework (NPPF)

- 2.1 The [NPPF](#) (December 2024) indicates (paragraph 109) that transport issues should be considered from the earliest stages of plan-making. This should involve identifying and pursuing opportunities to promote walking, cycling and public transport use. It states (paragraph 111) *“Planning policies should: [...] b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils [...] d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).”* In terms of parking, the framework specifies (paragraph 112-113) that policies should take into account the availability and opportunities for public transport.

Regional Policy and Strategy

- 2.2 England's Economic Heartland (EEH), the subnational transport body stretching from Swindon in the west to Cambridge in the east published its [Transport Strategy: Connecting People, Transforming Journeys](#) in February 2021. Although a non-statutory document, this strategy sets out a policy framework designed to deliver the EEH's ambition to support sustainable growth and improve quality of life and well-being through a world-class, decarbonised transport system which harnesses the region's global expertise in technology and innovation to unlock new opportunities for residents and businesses, in a way that benefits the UK as a whole. Informed by a programme of technical work, taken forward in collaboration with partners within the Heartland and Government, the strategy is guided by four key principles:
- Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040;
 - Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel;
 - Supporting the regional economy by connecting people and businesses to markets and opportunities; and

- Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact.

2.3 There are various relevant strategies listed below:

- The EEH have produced multiple connectivity studies (see here: <https://englandseconomicheartland.com/publications-and-papers/publications>) for areas in Oxfordshire which helps to identify opportunities for partnership working and develop the case for regional funding and further scheme development.
- Transport mode-based evidence studies and strategies have also now been produced. These include:
 - The Active Travel Strategy ([Part 1](#) (March 2022) and [Part 2](#) (July 2023)) which identifies cross boundary opportunities to improve active travel;
 - The [Regional Bus Strategy](#) (July 2022) which identifies opportunities to improve cross boundary bus movements;
 - The [Mobility Hubs Business Case Guidance](#) (March 2023) which provides practical guidance and advice in developing business cases and undertaking appraisal for mobility hub proposals;
 - The [Improving the North Cotswold Line](#) strategic narrative (January 2025) and [The case for reinstating Oxford-Swindon-Bath-Bristol rail services](#) (January 2025) which both aim to improve services along their corridors, Hereford, Worcester and Oxford and Oxford-Swindon-Bath-Bristol respectively.

Local Transport and Connectivity Plan (LTCP)

2.4 The [LTCP](#), adopted in July 2022 and updated in November 2024 is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents.

2.5 The headline targets in the LTCP include:

By 2030:

- Replace or remove 1 out of every 4 current car trips in Oxfordshire;
- Reduce car vehicle miles driven in Oxfordshire by 10%;
- Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week; and
- Reduce road fatalities or serious injuries by 50%.

By 2040:

- Deliver a net-zero transport network; and
- Replace or remove an additional 1 out of 3 car trips in Oxfordshire

By 2050:

- Have zero, or as close as possible, road fatalities or serious injuries; and
- Deliver a transport network that contributes to a climate positive future

2.6 These are to be achieved by reducing the need to travel, discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice. The LTCP vision and policies will be used to influence and inform how we manage transport and the types of schemes implemented. The latest [LTCP monitoring report](#) covering 2023-2024 was published in November 2024.

2.7 The LTCP is supported by a number of strategies and plans which are relevant to Oxford. These include the [Active Travel Strategy](#) (July 2022) which focuses on active travel modes; the [Mobility Hub Strategy](#) (July 2023) which focuses on transport interchanges across the county to improve the way we travel and to better integrate different transport modes; the [Freight and logistics strategy](#) (July 2022) which addresses some of the challenges with the movement of goods in Oxfordshire; the [Innovation Framework](#), (October 2021) which sets out guidance as to how to consider innovation within planning and development; the [Digital Infrastructure Strategy](#) (updated summer 2022) which sets out how to continue to improve both fixed and mobile digital connectivity in collaboration with partners, suppliers, and central government, the [Central Oxfordshire Travel Plan](#) (COTP) (August 2023) which sets out the transport plan for the central Oxfordshire area from 2023 to 2050, with a focus over the period to 2032 and the [OxRAIL 2040: Plan for Rail](#) (November 2025) which aims to deliver on high-level policies on rail and public transport described in the LTCP.

Central Oxfordshire Travel Plan (COTP)

2.8 The COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors (Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley). The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets. For Oxford these include the following:

- an expanded [zero emission zone](#) (ZEZ) - an expansion of the pilot ZEZ launched in February 2022;
- strategic [traffic filters](#) - intended to reduce traffic levels in Oxford by managing the use of certain roads in the city by private cars; and
- a [workplace parking levy](#) - an annual charge to businesses with 11 or more staff parking spaces within the Oxford ring road. The funds raised from a WPL would be set aside to improve transport in and around the city.
- Improving priority and safety of sustainable modes through implementation of the Oxford [Local Cycling and Walking Infrastructure Plan](#) (LCWIP) (March 2020) and the Oxfordshire Strategic Active Travel Network (SATN) sets out priority infrastructure measures fundamental to achieving a step change in cycling and walking in Oxford in terms of infrastructure. This includes [low traffic neighbourhoods](#) (LTNs), and the introduction of active travel routes (Quickways,

Quietways and Connector Routes). Whilst there are no specific targets for improving overall walking levels, the LCWIP supports measures to provide appropriate infrastructure for those with mobility issues, children and older people.

- The introduction of a Central Oxfordshire Movement and Place Framework (COMPF). A joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration.

Oxfordshire Housing and Growth Deal

- 2.9 The Oxfordshire Leaders Joint Committee (formerly the Future Oxfordshire Partnership) secured £215 million of Government investment for new homes and infrastructure across Oxfordshire in 2017, of which £60m is for affordable housing and £150m is for infrastructure improvements. Within Oxford City, funding from the Housing and Growth Deal is being used alongside match funding and other developer funding to fund technical work for infrastructure improvements that include a number of measures set out in the COTP, as well as complementary development work to support the reopening of the Cowley Branch Line; a new pedestrian and cycle bridge between Oxpens and Osney Mead and the Environment Agency's planned Oxford Flood Alleviation Scheme (OFAS).

Department for Transport's Local Growth Fund and Homes England's Housing Infrastructure Fund (HIF)

- 2.10 Oxfordshire County Council has secured funding from the above for improvements between Eynsham and Oxford. The A40 improvement programme which will improve the commutes of current and future residents as well as visitors to Oxford, includes a new bus lane between Eynsham and Oxford and upgraded walking and cycling facilities along the route.

Bus Service Improvement Plan (BSIP)

- 2.11 In March 2021 the Department for Transport published a new long-term national strategy for buses in England titled [Bus Back Better](#). This asks local authorities and bus operators to work in partnership to develop ambitious plans to deliver better bus service in their area. [Oxfordshire's Bus Service Improvement Plan](#) was adopted in October 2021. It is reviewed annually with the latest update in June 2024. The [Oxfordshire BSIP delivery plan 2025-26](#) which includes improvements in the Oxford City area was approved in March 2025.
- 2.12 In March 2022, Oxfordshire County Council was awarded funding from the government's [Zero Emission Bus Regional Areas \(ZEBRA\) scheme](#). With additional funding from the council and bus companies Stagecoach and the Go Ahead Group, the ZEBRA scheme will deliver 159 electric buses and supporting charging infrastructure to Oxfordshire. Electric buses are now operational on many routes covering Oxford, helping to improve air quality within the city, reduce CO2 emissions and make bus travel a more attractive option.

Oxfordshire Rail Corridor Study

- 2.13 [The Oxfordshire Rail Corridor Study](#) (ORCS) (June 2021) was jointly funded by the Department for Transport, Future Oxfordshire Partnership (now named the Oxfordshire Leaders Joint Committee) and other partners. It focuses on the movement of people and goods across the rail network in Oxfordshire, with particular emphasis on how rail can support growth and development across the County and the wider region and inform strategic decisions. The study identifies several strategic capacity requirements on the rail network as well as a need for better connectivity between key rail hubs within the county. For Oxford City, the introduction of East-West rail services from Milton Keynes/ Bletchley to Oxford require improvements to the capacity and upgrades at Oxford Rail Station which are being undertaken. Further service enhancements are also identified to enable new passenger services via the Cowley Branch Line to London with two new stations on the Branch Line. The study also identified a need for increases in freight path availability particularly between Didcot and Oxford, including 4- tracking of the rail line between Oxford Station and Radley.

Oxfordshire Connect

- 2.14 Oxfordshire Connect is a programme to upgrade Oxford Station and includes expanding the railway infrastructure and improving the local road network. The works include the replacement of the Botley Road bridge to enable upgrades to Oxford station, the wider railways and road, cycle and pedestrian routes as well as signalling and track upgrades. The outcomes the programme will bring include:
- A bigger, better station for everyone;
 - More services with East West Rail;
 - Additional rail capacity for the future; and
 - An improved and safer road layout.

Electric Vehicle (EV) Charging Strategy

- 2.15 The [Oxfordshire Electric Vehicle Infrastructure Strategy](#) (OEVIS), adopted by Oxfordshire County Council in March 2021 sets out policies and plans to support the transition to zero emission road transport. This will help Oxfordshire to achieve net zero carbon, reduce air pollution, and deliver key transport initiatives such as the Oxford Zero Emission Zone (see above). The strategy is among the first of its kind in the UK and has been a collaborative piece of work between the County and five district councils of Oxfordshire.
- 2.16 Of the 17 OEVIS policies, those of most relevance to policy makers are Policy EVI 7 and Policy EVI 8:

Policy EVI 7: The Councils will seek to include statements & policies supportive of EV charging infrastructure and, where appropriate, references to the Oxfordshire Electric Vehicle Infrastructure Strategy in their planning standards and guidance;

Policy EVI 8: The Councils will benchmark nationally, and between themselves, each seeking to set minimum standards for the quantity of EV charging to be provided in developments in their planning requirements.

- 2.17 Oxford City has adopted its own [Electric Vehicle Infrastructure Strategy](#) (July 2022) and has installed a number of EV charge points across the city as part of the '[Go Ultra Low Oxford](#)' project.

Transport/ Traffic Modelling

- 2.18 The transport/ traffic model used to inform the Oxford Local Plan 2045 is the County Council's Oxfordshire Strategic Model (OSM). Background Paper 012a provides a discussion of how that model has been used to inform plan-making in the city.

Oxford Local Plan 2036

- 2.19 The [Oxford Local Plan 2036](#) is the current adopted Local Plan. The plan aims to reduce carbon emissions, encourage the use of sustainable transport modes and make the best use of land. Section 7 contains strong policies to help realise this strategy:
- Policy M1 seeks to promote sustainable transport choices by prioritising walking, cycling and public transport.
 - Policy M2 seeks the submission of Transport Assessments/Statements and Travel Plans from development proposals that will have significant transport implications, with the intention of reducing car travel and encouraging the use of sustainable transport.
 - Policy M3 requires new residential development to be car free in Controlled Parking Zones and no increases in parking provision and ideally a reduction, in all other areas. For non-residential developments the policy aspirations are to keep parking levels to an operational minimum, with a shift towards more sustainable travel modes. A low standard for car parking provision means that a greater proportion of scarce land can be used for providing homes and avoids issues of parking creating poor urban design. Reduced car parking, and therefore car ownership and car trips, is likely to reduce air pollution and noise levels. Fewer cars using the roads improves the attraction of walking, cycling, and spending time in the public realm.
 - Policy M4 seeks the provision of electric charging points in new developments.
 - Policy M5 addresses cycle parking provision.

Corporate Plan

- 2.20 [Oxford City's Council's Strategy 2024-28](#) was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:
- Good, affordable homes;
 - Strong, fair economy;
 - Thriving communities;
 - Zero Carbon Oxford; and
 - Well-run Council.

2.21 The strategy identifies that achieving a Zero Carbon Oxford will require a citywide effort, involving local and national government, businesses, institutions and citizens. To help achieve a Zero Carbon Oxford, priorities for the City Council include:

- Decarbonising homes and other buildings and securing the additional funding required to meet the target of becoming a zero carbon council by 2030 and a net zero city by 2040;
- Maintain and improve parks, green spaces, biodiversity and access to nature; and
- Develop low carbon infrastructure and support households, businesses and institutions to save energy and cut emissions.

2.22 Commitments to achieve these priorities include:

- Ensuring all homes and other buildings are built to high standards with good energy efficiency;
- Maintain and improve biodiversity in our green spaces and access to nature in the city; ensure building projects support biodiversity by providing land for OX Place and other developers to use for Biodiversity Net Gain locally when exceptional circumstances mean it cannot be delivered on the building site itself; and
- Working with partners to deliver a Local Area Energy Plan for Oxford to support decarbonisation and infrastructure development.

2.23 To help enable a strong fair economy, the City Council commits to maximising the local benefit from investment in a new station for Oxford, and continuing to work for the Cowley Branch line extension (which received £120m of government funding in October 2025).

2.24 The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. It is underpinned by the Medium-Term Financial Strategy 2026-27 to 2028-29 that sets out the financial priorities and commitments over the next three years. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators (see the [Annual Business Plan 2025 to 2026](#)). In turn the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

Oxford Climate Emergency

2.25 In January 2019, Oxford declared a climate emergency and in autumn 2019 was the first city to hold a Citizen's Assembly on Climate Change. Since 2019 work has continued to tackle the climate emergency and Zero Carbon Oxford is the goal for Oxford to achieve net zero carbon emissions across the city as a whole by the year 2040, 10 years ahead of the legal deadline set by Government.

2.26 In February 2021, the Zero Carbon Oxford Partnership was created, comprising a group of leaders from Oxford's main institutions and employers, including the universities, hospitals, businesses and other organisations. The [Zero Carbon Oxford roadmap and Action Plan](#)

was published in July 2021 outlining how the 2040 target can be achieved. Zero Carbon Oxford projects include [Energy Superhub Oxford](#), Europe's most powerful electric vehicle charging hub; Oxford Zero Emission Zone (see above), introduced by Oxfordshire County Council and Oxford City Council to improve air quality, cut carbon emissions, and move towards zero emission travel in the city; and Go Ultra Low Oxford which provides electric car charging solutions for Oxford residents who do not have a driveway.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

- 3.1 Oxford is a city recognised for its high levels of walking and cycling however, the LCWIP identifies that cycling conditions, provision and routes are often very poor. The cycling section of the Active Travel Strategy and the Oxford LCWIP sets targets to increase both commuter cycling and all cycling trips in Oxford by 50% by 2031.
- 3.2 Figure 3.1 shows the number of cycle trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of cycling trips per week in Oxford fell from 2019 to 2021, which is most likely because of the Covid 19 pandemic. Since 2021 the number of trips has increased but have not returned to those recorded pre pandemic. Notably, the surveys were conducted during different months in each year which does have an impact upon cycling take up.

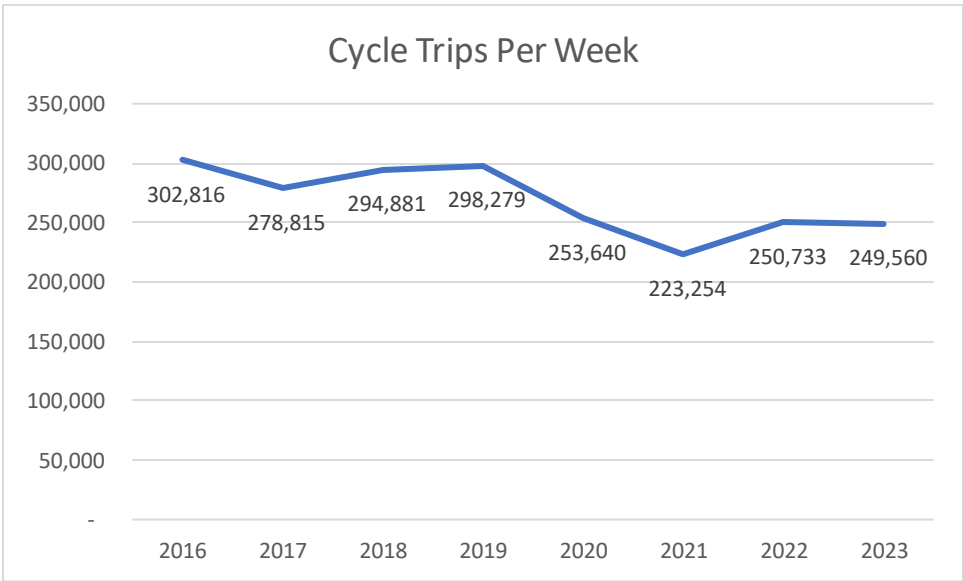


Figure 3.1 - Total number of cycle trips per week 2016 – 2023

- 3.3 Figure 3.2 shows the number of walking trips per week in Oxford City between 2016 and 2023. This data is calculated using Sport England's Active Lives Survey. The data shows that the number of walking trips per week has fluctuated over the years, with the lowest

number of trips occurring during 2017. More recent data shows that the number of trips has been increasing since 2021 and now exceeds the previous recorded high in 2018.

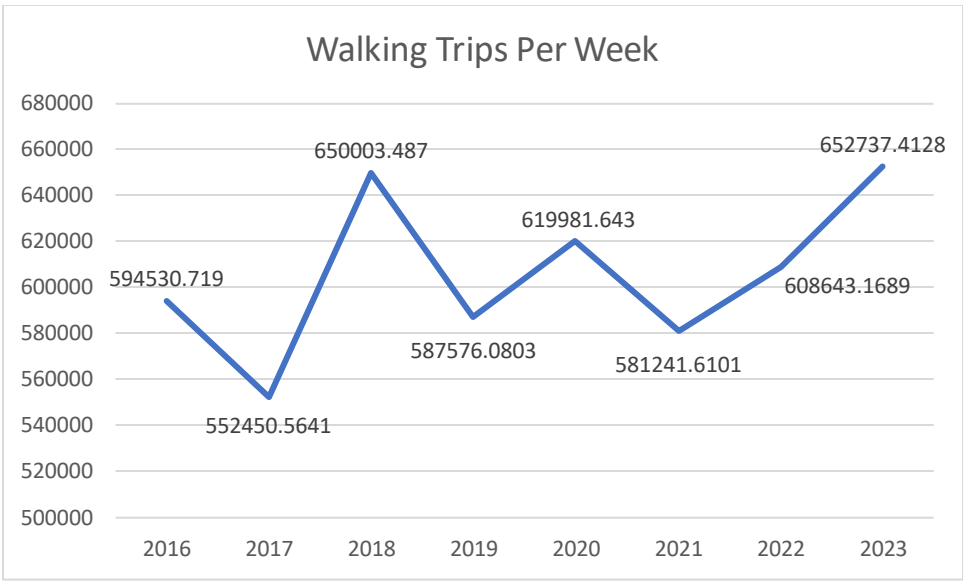


Figure 3.2 - Total number of walking trips per week 2016 – 2023

- 3.4 In terms of commuter travel, Figure 3.3 shows a comparison of the transport mode share of Oxford with the rest of Oxfordshire and nationally. This comparison uses data from the 2021 census which was undertaken during the COVID-19 pandemic. Census Day was in March 2021 during the national lockdown and although the census addressed questions related to Travel to Work, it did not collect any workplace address information for those working at home, including those following government guidance to do so. Furthermore there were large numbers of people still being supported by government furlough schemes and it is not clear whether the Office of National Statistics (ONS) guidance issued in relation to this question was followed; some people may have provided travel information for the last time they worked, or they may have answered with their behaviours on Census Day.
- 3.5 Notwithstanding the above, the data which includes a ‘working from home’ category (that accounts for residents who live in Oxford and work remotely (i.e. do not commute)) shows that when compared to the rest of the Oxfordshire and nationally, Oxford has a much higher share of people commuting to work on foot and by bicycle or bus. Consequently, the percentage of people travelling to work by train, or by car or van is much lower than national averages.

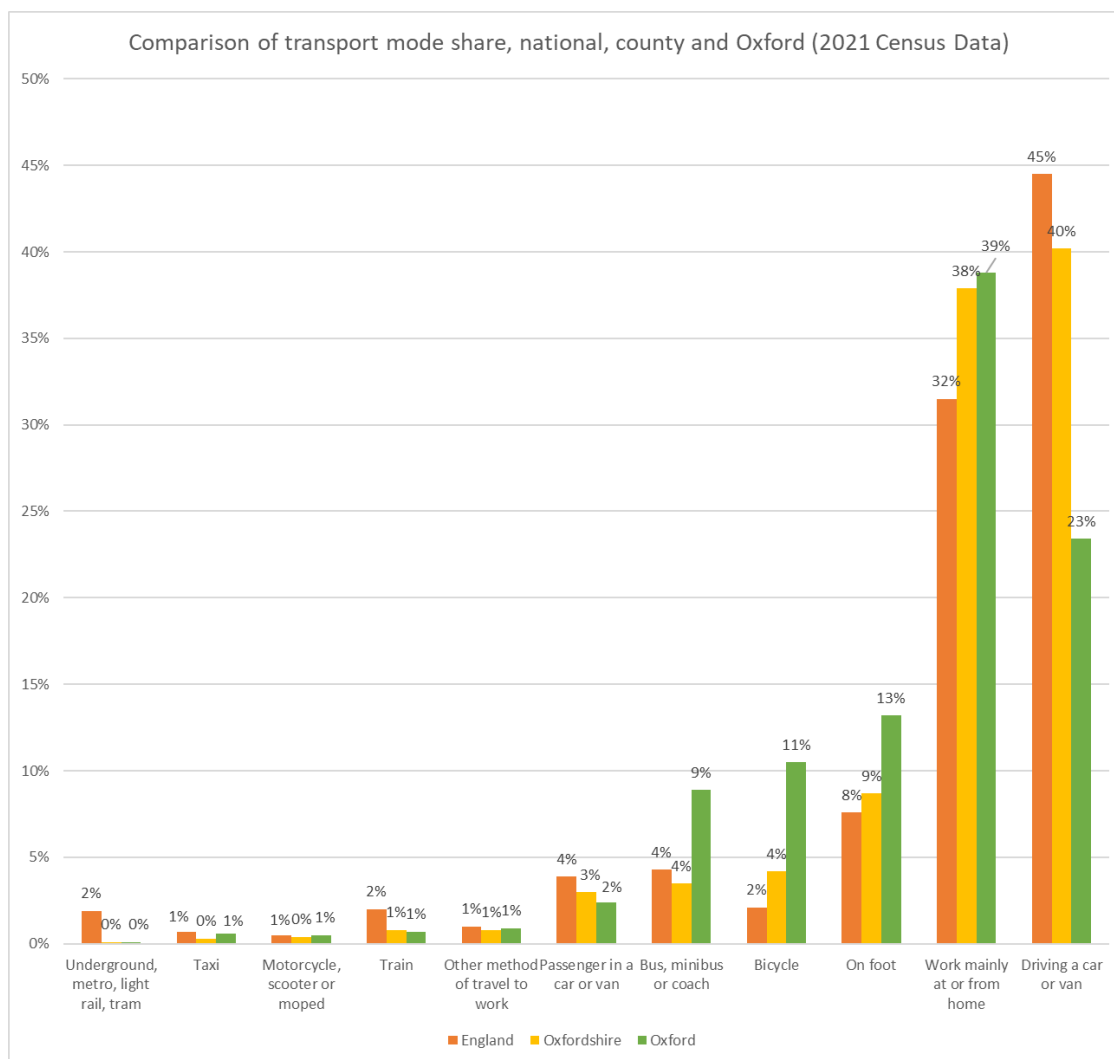


Figure 3.3 - Transport mode share for Oxford, Oxfordshire and England (2021 Census)

3.6 Whilst it is not possible to analyse origin destination by mode of transport from the 2021 census dataset, it is possible to review the journey origin data for commuters to Oxford. At the time of the 2021 census, a total of 92,047 people worked in Oxford, including 34,732 who worked from home or had no fixed place of work, and 28,973 who travelled within the area. Excluding those 'working from home' and those 'who lived within the Oxford boundary', the largest movement into Oxford was from the Vale of White Horse, followed by Cherwell and South Oxfordshire as shown in Figure 3.4 below.

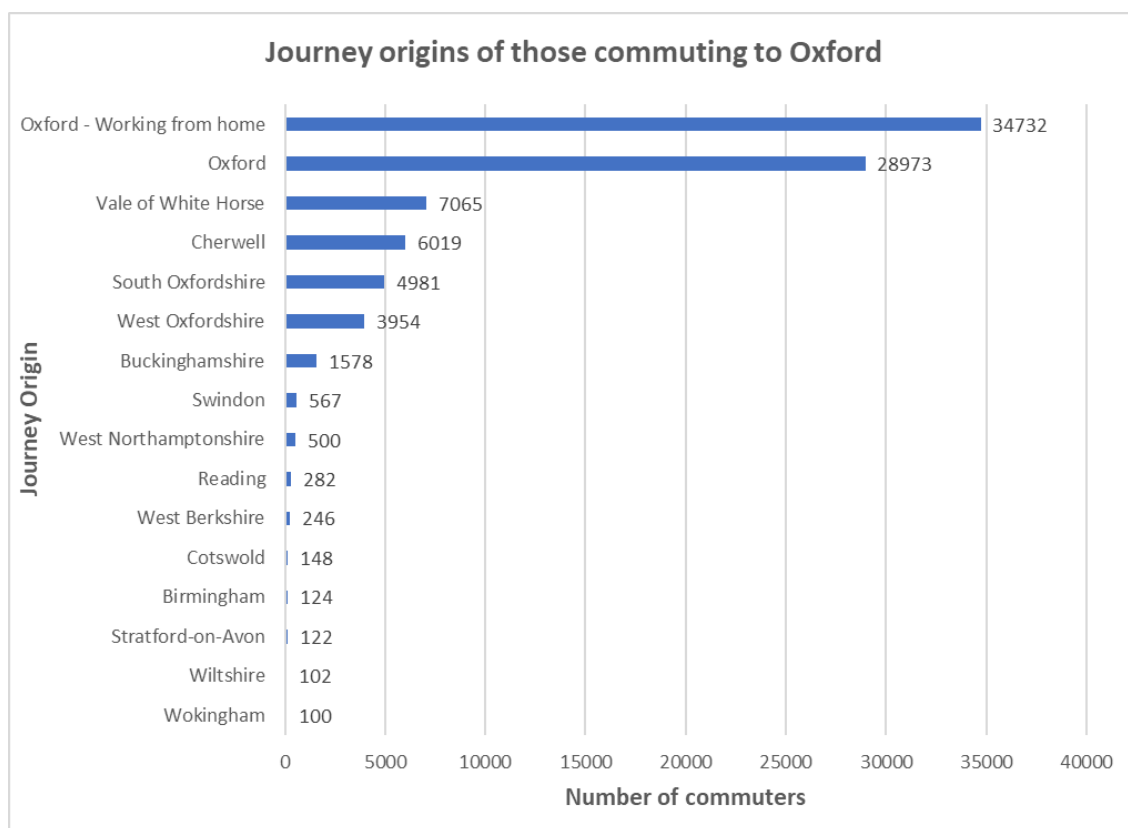


Figure 3.4 - Journey origin data for commuters to Oxford.

- 3.7 Within Oxford itself, it is possible to review the origin and destination of working people within specific wards of the city by using the [Origin-Destination Explorer](#) and then using the [Census 2021 Maps](#) to identify Middle Super Output Areas (MSOAs). Table 3.1 below identifies origin and destination data for wards in the east of the city that are either near or contain areas of employment (e.g. the Science Park, ARC Oxford (former Oxford Business Park), BMW, and the Headington hospitals). The data set for Oxford (all wards) has also been included as a reference point.

Area (MSOA)	Lived here	Worked here	Lived and worked here	Travelled to another area to work	Travelled from another area to work	Go (out) to work to:	Come to work from:
Oxford	73,324	92,047	63,705	9,619	28,342	Vale of White Horse (2,292), South Oxfordshire (1,702), and Cherwell (1,638)	Vale of White Horse (7,065), Cherwell (6,019), and South Oxfordshire (4,981)
Littlemore & Rose Hill	5,500	5,293	2,484	3,016	2,809	Oxford Central (418), Lye Valley and Cowley East (403), Headington (374)	Greater Leys (160), Blackbird Leys (157), Cowley South and Iffley (151)
Blackbird Leys	3,116	2,240	1,062	2,054	1,178	Lye Valley and Cowley East (386), Headington (261), and Oxford Central (257)	Greater Leys (123), Littlemore and Rose Hill (106), and Lye Valley and Cowley East (79)
Greater Leys	3,332	1,479	1,098	2,234	381	Lye Valley and Cowley East (348), Headington (284), and Oxford Central (253).	Blackbird Leys (64), Littlemore and Rose Hill (42), Cowley South and Iffley (26)
Cowley North	4,076	2,862	1,938	2,138	924	Oxford Central (452), Headington (316), and Lye Valley and Cowley East (223)	Cowley South and Iffley (66), Littlemore and Rose Hill (57), Lye Valley and Cowley East (49)

Cowley South and Iffley	5,482	4,478	2,611	2,871	1,867	Oxford Central (549), Lye Valley and Cowley East (429), Headington (335)	Littlemore and Rose Hill (205), Greater Leys (121), and Blackbird Leys (118)
Lye Valley and Cowley East	4,064	8,713	1,916	2,148	6,797	Headington (533), Oxford Central (316), and Churchill (203)	Cowley South and Iffley (429), Littlemore and Rose Hill (403), and Blackbird Leys (386)
Headington	5,166	16,693	3,402	1,764	13,291	Oxford Central (345), Churchill (273), East Central Oxford (78)	Barton (821), Churchill (723), and Risinghurst and Sandhills (693).

Table 3.1 - Origin Destination Data for city wards

- 3.8 Table 3.1 shows that the largest movement of people out of Littlemore and Rose Hill, Cowley North and Cowley South, Iffley and Headington was to Oxford Central. The largest movement of people out of Blackbird Leys and Greater Leys was to Lye Valley and Cowley East, and the largest movement of people out of Lye Valley and Cowley East was to Headington.
- 3.9 The strategic road network around Oxford is primarily served by the A34, A40, A420, and the ring road. Within Oxford, key arterial routes accommodate large amounts of vehicular traffic; sharing these with strategic bus routes that connect Oxfordshire's principal towns and settlements (such as Abingdon, Banbury, Bicester, Didcot, Kidlington, Thame, Wantage, and Witney) as shown in Figure 3.5. Banbury, Bicester, and Didcot, as well as a number of smaller villages are also connected to Oxford via the railway network. Together, the bus and railway network provide opportunities for commuter traffic from neighbouring authorities to access the city by sustainable modes. National Cycle Routes 5 and 57 also provide access to the National Cycle Network, with connections to Bicester, Didcot, Kidlington and Thame; as well as several smaller villages on these routes.

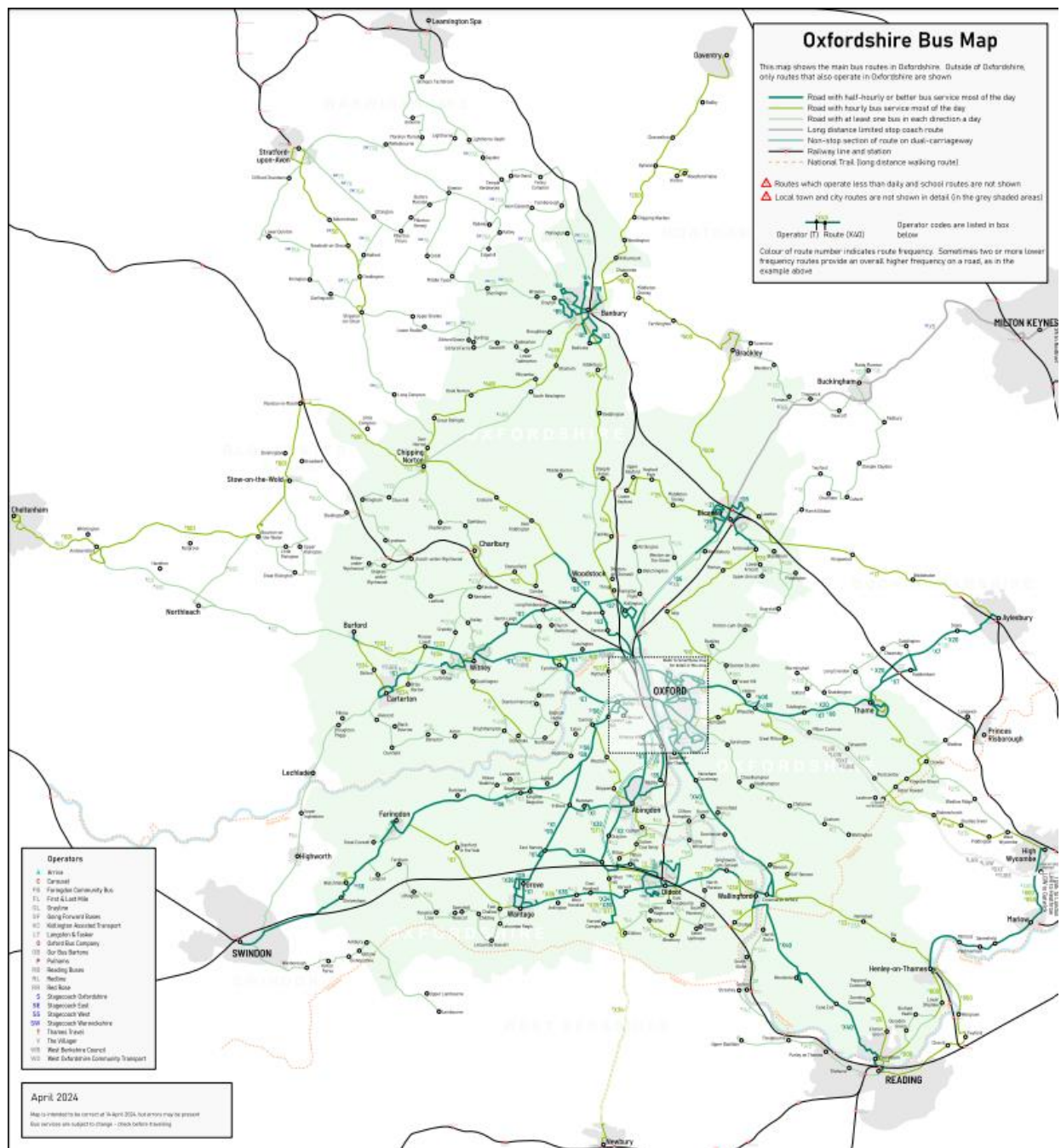


Figure 3.5 - Oxfordshire Bus Map (reproduced here with permission of Oxfordshire County Council)

3.10 Despite having very good bus services and higher levels of cycling and public transport use than many comparable cities in the country, congestion on Oxford's main roads is endemic. The entire city of Oxford has been a designated Air Quality Management Area (AQMA) for NO₂ since 2010 and whilst air pollution levels have significantly improved in the city over the last few years, Oxford City Council is aware that there's still more to be done. The latest [Air Quality Annual Status Report](#) (published June 2025 and reporting on 2024 observations) indicates that the transport sector continues to be the largest contributor (44%) to total emissions of Nitrogen Oxides (NO + NO₂) in the city, followed by combustion from industry

and services (30%), domestic combustion (26%), and others: waste, agriculture, solvents, nature (<1%). The Natural Resources background paper (BGP.9) provides more information on air quality in the city and the strategies that are in place to improve it.

Motor Vehicle Parking

- 3.11 In a compact city like Oxford where there are many competing demands on space, it is important to consider whether using large areas of land for parking of vehicles is appropriate. Vehicle parking is usually an inefficient use of land. However, there will be those who need to drive or who drive to access certain areas at certain times and for particular types of trips. The needs of people to access services and potential impacts on local centres if there is not enough parking must be balanced against the negative effects of car traffic generation.

Public Car Parking in City and District Centres

- 3.12 With regards to public parking provision, the current Local Plan's strategy is that in the city centre, levels of public parking will be maintained at approximately the same levels, with a discouragement of arrivals during network peaks. Meanwhile, within district centres it is to maintain roughly current levels of public parking.

Residential Parking

- 3.13 The current Oxford Local Plan 2036 permits only low levels of residential parking for new residential developments. The majority of the city has an excellent existing level of public transport provision, as well as good connectivity by walking and cycling, therefore, in certain circumstances, Policy M3 of the Local Plan requires residential developments to be "car free"; that is they will have no general parking spaces provided for residents. Policy M3 allows for some parking however, for example for disabled and visitors, ensuring there are not negative consequences for accessibility for the elderly, disabled and vulnerable groups.

Controlled Parking Zones (CPZ)

- 3.14 Large parts of the city are already covered by a CPZ (an area where parking is only permitted in designated parking bays, and the rest of the kerbside space is restricted by yellow lines) as shown on the map in Figure 3.6 below. Where CPZs have been implemented they have been extremely successful in removing commuter parking. Further expansion of CPZs is currently being rolled out by Oxfordshire County Council, and Oxford City Council supports these measures and efforts to ensure that increases in residential population and/or in visitors do not bring about increases in the number of vehicles parked in an area. In CPZs, new developments with little private parking are less likely to have a negative impact on surrounding areas, as parking cannot be displaced to the street. Over time it is likely that most streets in the city will be covered by parking restrictions.

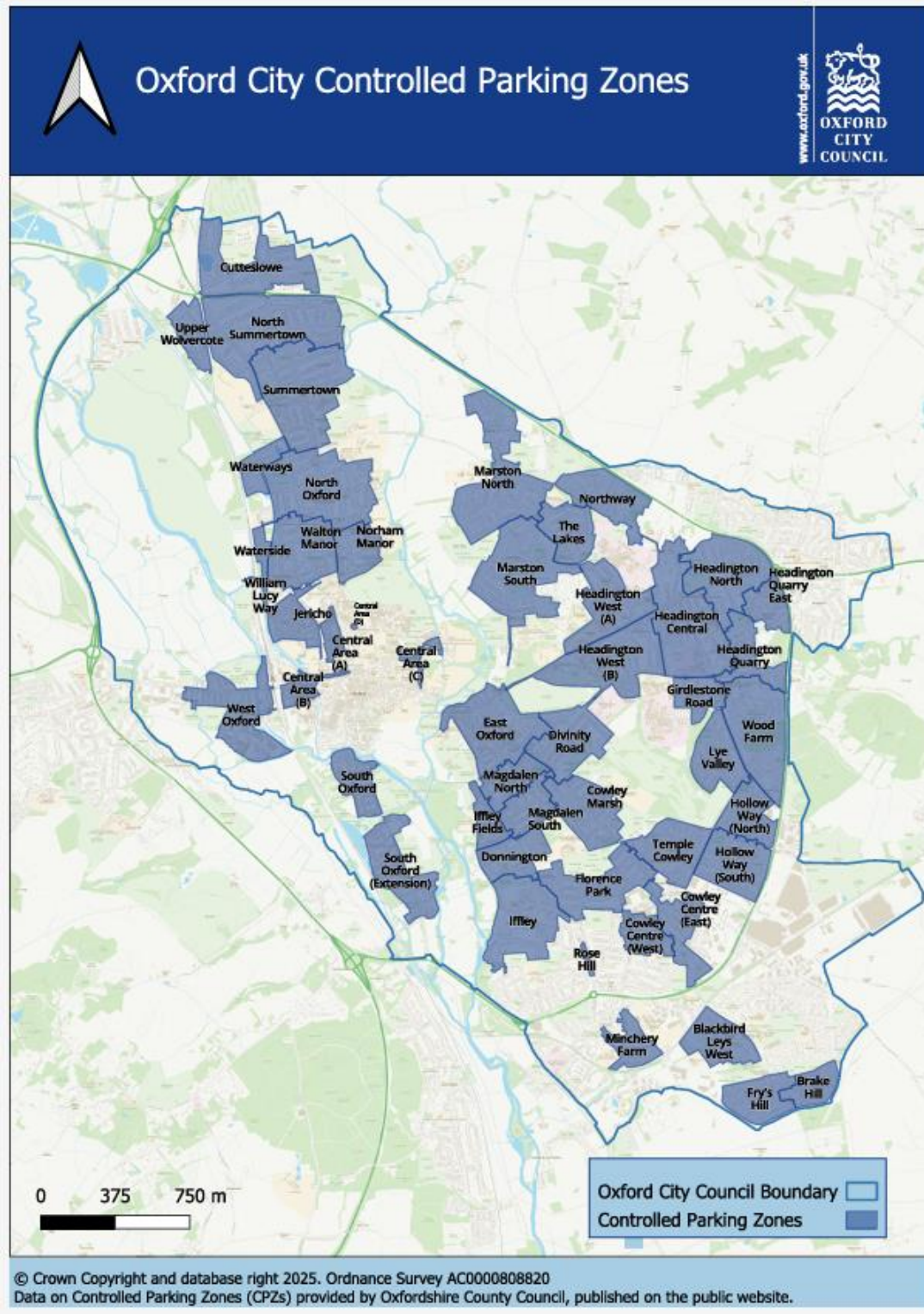


Figure 3.6 Controlled parking zones in Oxford (November 2024 Oxfordshire County Council)

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

- 4.1 Without a new Local Plan, the policies within the current Local Plan 2036 would remain in place until 2036 or until they become otherwise out of date. At this point the National Planning Policy Framework would take over as a default. These policies should help deliver increased use of sustainable modes of transport within Oxford. The residential car parking policies should help reduce car ownership on new build developments. Other policies seek to safeguard land for the reopening of the Cowley Branch Line for passenger services and support the redevelopment of Oxford Rail Station.
- 4.2 With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Both Oxfordshire County Council and Oxford City Council are preparing detailed measures for implementing the Central Oxfordshire Travel Plan. This will include traffic filters, the introduction of a workplace parking levy, and an extended zero emission zone in the city centre.
- 4.3 Without a new Local Plan, these measures will still come forward, but the existing policies will remain as drafted when the plan was adopted in 2020 and in time, will become out of date whereas the evidence base and influencing strategies as described above, will have continued to develop and evolve, and the urgency with which we need to address the climate emergency will also have increased. A new Local Plan provides the opportunity for the existing policies to evolve and be further developed to ensure that the issues affecting Oxford are addressed.

5. Key issues addressed through the Local Plan

Introduction

- 5.1 The analysis set out in the previous sections of this background paper indicate that the Local Plan 2045 will need to take account of existing and emerging transport strategies for Oxford including those that the County Council as LHA are leading on. These strategies will help shape policies that encourage travel by sustainable modes, such as walking, wheeling, cycling, and public transport, helping to continue to address the transport sector's contribution to climate change in Oxford.
- 5.2 The Regulation 18 consultation identified a number of transport and movement topics that could be addressed through implementation of a policy. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The tables identified potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and helped inform the preferred position set out for consultation.

- 5.3 Additionally, the options sets were considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.
- 5.4 The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period. The tables are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan 2045.
- 5.5 This section will now discuss the key issues that are being addressed through the Local Plan 2045 in response to the topics and how the policies respond to them. The proposed policies are as follows:
- Transport Assessments/Statements, Travel Plans and Service and Delivery Plans,
 - Cycle Parking and Powered Two Wheeler Parking,
 - Motor Vehicle Parking Design Standards, and
 - Electric Vehicle Charging

Transport Assessments/Statements, Travel Plans and Service and Delivery Plans

- 5.6 The Plan sets out the requirements relating to the submission of Transport Assessments/ Statements, Travel Plans, Delivery and Service Management Plans and Construction Management Plans in support of development proposals. This has been included to ensure that major new development proposals seek to optimise active travel and public transport opportunities and aim to limit the increase in car journeys which would contribute to air pollution and congestion.
- 5.7 The requirements for Transport Assessments/ Statements are set out in Policy C6 and Appendix 7.2. Travel Plan requirements are set out in Policy C6 and Appendix 7.3. The requirements for Delivery and Service Management Plans and Construction Management Plans are set out in Policy C6.

Cycle and Powered Two Wheelers Parking

- 5.8 The Plan seeks to ensure that adequate parking provision is made for these modes of transport in new developments. The parking design standards for cycle and powered two wheelers is set out in Policy C7 and Appendix 7.4. The standards largely align with Oxfordshire County Council's Parking Standards for New Developments, with

some elements tailored to the local context. Following feedback from the Regulation 18 consultation the title of the policy has been amended from 'Bicycle' to 'Cycle' as this is considered a more inclusive term. The direct reference to 'Motorcycle' within the policy title has also been removed as was not considered necessary as 'Powered Two Wheeler' includes motorcycles.

Motor Vehicle Parking Design Standards

- 5.9 The Plan seeks to reduce opportunities for parking in different types of development across the city. The parking standards for residential and non residential developments are set out in Policy C8 and Appendix 7.6. The standards align with Oxfordshire County Council's Parking Standards for New Developments.

Electric Vehicle Charging

- 5.10 Infrastructure for the charging of electric vehicles is addressed by Part S of the Building Regulations. To ensure that chargers are well located and designed for ease of use, the requirements for electric vehicle charging for both residential and non residential developments are included in Policy C8 which includes reference to the Oxfordshire County Council Street Design Guide to ensure suitable provision for off-plot parking.

Appendix A – Policy options and preferred approaches

Policy options set 012a (draft Policy C6): Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

Key tools to appraise and determine the transport impacts of a development proposal are Transport Assessments (TA)/Statements (TS), Travel Plans (TPs), Construction Management Plans (CMPs) and Service and Delivery Plans (SDPs). TA/Ss are a comprehensive and systematic approaches to ensure that the transport impacts of the development are properly considered and where appropriate include measures to help mitigate development impact. TPs are a package of measures tailored to suit the needs of an individual site and focus on reducing dependence on the private car. CMPs set out measures to minimise and mitigate the impacts of construction traffic and SDPs set out measures that will be introduced to minimise impacts of servicing and delivery traffic and are required to be submitted for development proposals that will affect the city centre or district centres and also for sites in close proximity to residential areas.

The options for the policy that have been considered for the LP2045 relate to the extent of requirements for submission of TAs/TSs, TPs, Construction Management Plans and SDPs in support of development proposals.

Table 1 - Policy options set 012a: Transport Assessments/ Statements, Travel Plans and Service and Delivery Plans

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require transport assessments/ statements and travel plans to review transport impacts and show transport measures proposed to mitigate them, for all development that is likely to have significant transport implications.	This approach will encourage measures that reduce the need to travel and manage congestion. In addition, more sustainable modes of travel are promoted as part of these assessments. Transport Assessments/Statements should include, for example, targets associated with the proportion of journeys made to and from the development site by travel modes more	These requirements could be seen as an extra burden on developers and those assessing applications. Travel Plans, to be effective, need monitoring, managing and where necessary enforcing. If the proposal is for employment activities, employers need to ensure that employees abide by the Travel Plan with appropriate sanctions for non-compliance.

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
	sustainable than the private car, and measures such as bus passes.	
Option b Require transport assessments/statements to also include construction management plans and service and delivery plans, where relevant.	Including construction management plans and service and delivery plans as part of the assessment process will also help to mitigate the impacts of construction, freight and service vehicles by requiring consideration of measures to minimise any issues that may arise, such as managing delivery times or construction materials. This is particularly important in busy and confined areas such as the city centre and for sites near residential areas.	These requirements could be seen as an extra burden on developers and those assessing applications.
Option c Do not include a policy requiring transport assessments/statements, travel plans, construction management plans or service and delivery plans.	Not requiring these reduces the burden on developers and assessors.	The assessment and mitigation of transport impacts of development schemes are crucial to their success or failure. Requiring an assessment as part of a planning application is the only way to secure the required information on which to make a sound planning decision. Without a requirement to assess and manage traffic impacts there may be an increase in congestion and a lack of encouragement and provision for active travel.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, Option a & b or Option c

High-level screening conclusion? - the options are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: Option a could either be stand alone or incorporated alongside option b. Option b is not strictly an alternative, but rather an additional option that could be added to a policy. Option c is the alternative.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution and criterion 6. to provide accessible essential services and facilities** and the level of sustainability impact is unlikely to vary significantly between option a and b. Both option a and option b would have a minor positive impact for access. Option a and b would have a minor positive impact for air quality; however, option b would potentially have a slightly more positive impact as it would also require consideration of construction traffic management and service and delivery plans which could result in further traffic reduction and associated air pollution (dust and fumes from equipment). Option c would have a minor negative impact as there is no direct national policy, and without any requirements in place it could exacerbate current congestion and air quality issues. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Transport Assessments, Travel Plans and Service and Delivery Plans – Policy C6:

For the Local Plan 2045, the preferred approach is to take forward a combination of **Options A and B**. Together these options will help to encourage measures that reduce the need to travel, manage congestion and consider from the outset how more sustainable modes of travel can be promoted. The requirement for Construction Management Plans and Service and Delivery Plans will also help mitigate the impacts of the development.

Policy options set 012b (draft Policy C7): Bicycle Parking Design Standards

If travel by sustainable modes of transport such as bicycle is, to be encouraged, it is important to ensure that there is secure bicycle parking in residential and employment developments. The options for the policy relate to how far the Local Plan 2045 should go in relation to levels of parking required for bicycles.

Table 2 - Policy options set 012b: Bicycle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require high levels of secure bicycle parking either indoors or external for residential and non-residential schemes to achieve best design outcomes.	The provision of a high level of well-designed cycle parking will help to encourage cycling across the city which brings positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthy lifestyles. This could increase the number of people cycling to work, to the shops, for health appointments, to school etc. as they will be confident that their bike will be parked in a safe secure way which would reduce the risk of theft or vandalism. This is particularly important with the rise in e-bikes. Also well designed bike parking can enhance the public realm.	Providing well designed secure cycle facilities could add to build costs and take up space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.
Option b Set more specific requirements for the type of bicycle parking for residential developments and workplaces to make sure e-bikes, trailers, tricycles etc. can be accommodated. Require higher levels of well-designed and secure bicycle parking and ensure that showers and lockers are provided to support staff.	More specialist types of bikes are increasingly common providing the option of cycling to a wider range of people. They also have more complex storage and charging requirements which won't necessary be met if the requirement for them is not set out clearly. Although showers are currently required for offices over 500m2 and most other non-residential uses over 2500m2	This adds an extra requirement for space and potentially cost, which may compete with other requirements.

	this approach encourages more provision for cyclists.	
Option c Lower the residential and non-residential bicycle parking standards from existing levels.	There is no loss of amenity space or indoor living space. This approach would help to reduce build costs for the scheme.	If insufficient or poorly designed bicycle parking is provided in new development, it is likely that bicycles will be parked informally in inappropriate areas causing clutter and obstruction. It provides no encouragement for future residents to consider cycling and embracing a more active and healthier lifestyle – lower levels of cycle parking may make it more difficult for people to store bikes and as such bike ownership could drop as travelling by bike is not practical without secure storage. There are already concerns across the city about bicycle parking stress and concerns about security particularly from those with more expensive bikes which are more at risk from being stolen. If Oxford is to become a cycling city reducing the levels of parking provision would be a disincentive to people who might be considering how to travel around the city other than by private car.
Option d No local policy standards	Not requiring these reduces the burden on developers.	Bicycles may be parked in inappropriate areas, potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d

High-level screening conclusion? - the options are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: All options are standalone and represent various levels of cycle parking that the local plan could ask for.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (supporting active travel options) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting active travel). Option a and option b would both have a minor positive impact for all the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some cycle space but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three criteria, as whilst there is potential for a developer to still provide cycle parking provision this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other less sustainable forms of transport e.g car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Policy options set 012c (draft Policy C7): Motorcycle and Powered Two Wheelers Parking Design Standards

Parking provision for motor cycle and powered two wheelers is also important and should be considered at the design stage to ensure the most efficient use of land and encourage the use of this mode of transport. The options for the policy relate to how far the Local Plan 2045 should go in relation to levels of parking for these vehicles.

Table 3 - Policy options set 012c: Motorcycle and Powered Two Wheelers Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a	The provision of a high level of well-designed parking would	Providing well designed secure facilities could add to build costs and take up

Require high levels of secure motorcycle and powered two-wheeler parking for residential and non-residential schemes to achieve best design outcomes.	reduce the risk of theft or vandalism. Also well designed parking can enhance the public realm.	space within the development which could be used to enhance the design in other ways and may result in the loss of public amenity areas.
Option b Set more specific requirements for the type of parking for residential developments and workplaces and ensure that showers and lockers are provided to support staff who use these modes of travel.	Although showers are currently required for offices over 500m ² and most other non-residential uses over 2500m ² this approach encourages more provision for those who use motorcycles and powered two wheelers.	This adds an extra requirement for space and potentially cost, which may compete with other requirements.
Option c Lower the residential and non-residential motorcycle and powered two-wheeler parking standards from existing levels.	There is no loss of amenity space. This approach would help to reduce build costs for the scheme.	If insufficient or poorly designed parking is provided in new development it is likely that motorcycles and powered two wheelers will be parked informally in inappropriate areas causing clutter and obstruction.
Option d Do not set any parking standards for motorcycles and powered two wheelers.	Not requiring these reduces the burden on developers.	Motorcycles and powered two wheelers may be parked in inappropriate areas potentially reducing the space available for parking motor vehicles and/or causing an obstruction.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, Option b, Option c or Option d
High-level screening conclusion? - the options are unlikely to have significant sustainability impacts
Screened in for detailed appraisal? - No

Rationale: All options are standalone and represent various levels of parking for motorcycles and powered two wheelers that the local plan could ask for.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Option a and option b would both have a minor positive impact for all the criteria however option b's prescriptive approach will depend on site context and could be harder to achieve on smaller sites, and easier to achieve on bigger sites thus whether it has slightly more or slightly less positive effect than option a will depend on implementation. Option c would have a neutral impact, it has the potential to provide some parking provision but what is provided could be unusable as for example it could be of poor quality. Option d is likely to have a minor negative impact against all three criteria, as whilst there is potential for a developer to still provide parking for motorcycles and powered two wheelers this could be as an afterthought and may be of poor quality or poorly located so that it is unattractive. Under option d it is assumed that occupiers would be pushed to other forms of transport e.g. car. Overall, the difference between the sustainability impacts of the different options are unlikely to be significant so it is not considered to warrant a detailed appraisal.

Cycle and Powered Two Wheelers Parking Design Standards – Policy C7

For the purposes of the Local Plan 2045 it was considered that merging the requirements of both Cycle and Powered Two Wheeler Parking into the same policy would be the best way forward. The preferred approach for Cycle parking is a combination of **Option A and Option B** which together are considered to bring positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthier lifestyles. The preferred approach for powered two wheeler parking is **Option A** which is considered to bring positive benefits as the provision of well designed and dedicated parking areas reduces the risk of theft or vandalism and can also provide enhanced public realm for example by reducing opportunity for inappropriate parking of these types of vehicles.

Policy options set 012d (draft Policy C8): Motor Vehicle Parking Design Standards

Setting the right level of parking for motor vehicles can positively influence design outcomes, ensure the most efficient use of land and encourage residents to consider alternative options to using a private car. If standards are too low, a potential unintended effect is that parking is displaced to surrounding streets that do not have any parking restrictions. Although Controlled Parking Zones (CPZs) can prevent this from happening there are still parts of the city that are not included within a CPZ or where parking restrictions are not in

place 24 hours a day, 7 days a week. Whilst the LP2045 will have limited influence over the implementation of new or review of existing CPZs within the city, where planning permission is required, the levels of parking for motor vehicles can be considered.

The options set out below therefore focus on how parking levels could be considered in applications for both residential and non residential developments. For residential developments, low car would mean no car parking spaces allocated to a particular housing unit, instead, only a number of shared spaces and spaces for blue badge holders, service and delivery vehicles, including for working drivers. For non-residential developments, low car would mean either a reduction in existing car parking spaces where there is good accessibility for the area or provision of a number of shared spaces and spaces for blue badge holders, service and delivery vehicles. 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). For non-residential development, the standards seek car free development or operational use only with supporting evidence, which means applicants are able to justify higher levels of provision according to their site's needs which can result in significantly more provision.

Table 4 - Policy options set 012d: Motor Vehicle Parking Design Standards

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car ownership and car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer, and parents may feel more confident allowing their children to cycle or walk if there is less traffic on the roads.	Although sites are low car it could result in parking being displaced to other streets which are not restricted. In some parts of the city outside of the centres there are insufficient realistic alternative transport options other than using the car. Some occupations require employees to have a vehicle or take a vehicle home – many such jobs are low paid (e.g. mobile carers; maintenance trades; mini-cab drivers; etc.). Many households also work outside of the city; away from the

	Supports the use of car clubs across the city. Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	city or district centres; have children to take to school on the way to work; or work outside of the usual operating hours for bus services. Households that include persons in these occupations risk being excluded from housing that might best meet their needs, if low car schemes become predominant in new housing developments. Having low car parking provision for larger family dwellings for sale may impact on the viability of schemes, and the ability to deliver affordable housing.
Option b Adopt parking standards for residential developments	Ensures that the design of car parking is properly considered and encourages private car ownership. Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.
Option c Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.	A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements could encourage people to walk and cycle as they may feel safer.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution. The inadequate provision of parking at a site could lead to displaced parking on nearby streets creating parking stress elsewhere if there is no CPZ in operation.

	Supports the most efficient use of land, opportunity to create well designed external spaces. Low car developments can give proper and adequate consideration as to where the parking would be located to ensure good design is delivered.	
Option d Adopt parking standards for non-residential developments.	Ensures that the design of car parking is properly considered Levels of car parking provision would be consistent with other developments throughout the City.	More land would be used for parking and there would be more cars in the city adding to congestion, air and noise pollution.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a + c, Option a + d, Option b + c, Option b + d
High-level screening conclusion? - the options are likely to have significant sustainability impacts
Screened in for detailed appraisal? - Yes

Rationale: The options represent various levels of motor vehicle parking that the local plan could ask for. Assuming that options b and d are allowing a greater level of parking on sites than low car as in options a and c.

In terms of sustainability impacts, the different options all relate to **criterion 8. to reduce traffic and associated air pollution** (reducing reliance on the private car) **criterion 1. carbon emissions** and **criterion 11. good urban design** (assuming that high quality urban design would include supporting travel). Whilst all options allow for parking, options a and c could be neutral to positive as this would likely drive reductions in the amount of parking across residential and non-residential sites. Options b and d would potentially be neutral to negative in terms of impact against the same criteria, this would depend upon implementation e.g.

being more neutral where a site already has car parking and the standards would not allow for increases, but negative where provision is currently below the standard and there would be scope to increase levels of car parking.

In addition, option b may also have an indirect positive impact on **criterion 4 Local housing needs**, improving viability of new residential development because increased car parking can be provided. Option c, may have indirect impacts on **criterion 12 economic growth**, depending upon implementation, potentially having a neutral impact in terms of viability on new non-residential development where there is existing parking provision, or a more negative impact where there is no existing provision and they are unable to provide as much car parking which could impact viability.

Overall, there are varying sustainability impacts across the criteria depending on whether low car options are selected or not. As there is uncertainty about the impacts and whether they will be significant or not, the options should be screened in for further detailed appraisal.

Motor Vehicle Parking Design Standards – Policy C8

For the Local Plan 2045, the preferred approach is to have a policy that is supportive of parking design standards.

The preferred option is a combination of **Options A and B and Option C** as they push for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport but accept that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability.

The options set was tested through the Sustainability Appraisal with the options having varying impacts. Seeking low car where possible will help to maximise positive sustainability impacts but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward.

Policy options set 012e (draft Policy C9): Electric Vehicle Charging

The increase in ownership and use of electric vehicles has placed greater demand for charging infrastructure in both residential and commercial developments as well as in public spaces such as public car parks, leisure centres and shopping centres. The current

local plan does not include a policy to address Electric Vehicle Charging and although the delivery of infrastructure for charging vehicles is now covered by Building Regulations the options considered for LP2045 relate to how much further local design standards could go beyond what is being asked for in national building regulations.

Table 5 - Policy options set 012e: Electric Vehicle Charging

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Seek the provision of electric vehicle charging infrastructure on all new residential developments with a dedicated parking space and on all non-residential development providing additional car parking bays. Where there is no dedicated parking space and on street parking is proposed, appropriate infrastructure should be incorporated to enable the charging of electric vehicles on the street. All blue badge and car club parking bays must be electrified.	The NPPF indicates that when setting parking standards, policies should take into account an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. The provision of electric vehicle charging infrastructure for residential and non-residential developments supports the NPPF. It may also increase the market value of homes and non-residential developments. Demand on the electricity grid can be assessed at the time of application.	The requirement for the provision of EV infrastructure could lead to additional costs being incurred by developers for example there may not be adequate grid capacity
Option b Specify design standards for EVs being installed – e.g. in relation to impact on streetscape, safety etc.	This could help to ensure that a particular local context is considered (e.g. minimising harm to heritage assets or cluttering the street).	Design standards could change quite rapidly as technology develops. It might be challenging to be too specific at the Local Plan level (e.g. site context could differ a lot across the city). It might be better to direct applicants to other guidance/TANs.

Option c Do not seek any electric vehicle charging infrastructure on new residential developments or on non-residential developments and do not set any local design standards.	Associated costs of providing this infrastructure are not incurred by landowners/ developers.	Residents of new developments or employees at workplaces who have electric vehicles would not have access to charging infrastructure at their own property

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - Option a, Option a + b, or Option c

High-level screening conclusion? - the options are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: Option a is about requiring new EV charging points, Option b is about adding design considerations to the policy, and option c is an alternative to option a (or a+b) and essentially leaving standards to national regs.

In terms of sustainability impacts, the options relate to **criterion 8. Traffic and Air Pollution**, as well as **criterion 11 Urban design** (reducing harm to the amenity and local context from new EV equipment) and **1. Carbon emissions** (supporting occupiers to adopt lower carbon transport options). Options a and b both have minor positive impacts for criteria 8 and criteria 1 because they can support occupiers to choose low carbon transport options. Option a potentially has a minor negative impact on criterion 11, particularly where new EV equipment clutters up streetscape or causes harm to nearby heritage assets due to poor quality design. Option b would have a neutral impact for criterion 11 because it helps to ensure the harm to urban realm and heritage is mitigated. Option c would have a neutral impact for criteria 8 and 1, because Buildings Regs will require charging infrastructure to support EVs for most new development, however it would again potentially have a minor negative impact for criterion 11, for the same reasons as discussed under option a above. In conclusion, the sustainability impacts arising from the different options would be minor, and are not considered to warrant a detailed appraisal.

Electric Vehicle (EV) Parking – Policy C8

For the purposes of the Local Plan 2045 and following feedback received at Regulation 18 it was considered that merging the EV parking requirements with the Motor Vehicle Parking Design Standards would be the best way forward. The preferred approach is a

combination of **Option A and Option B**. Whilst recognised that EV infrastructure is part of Building Legislation, the NPPF makes it clear that if setting parking standards, policies should take into account the provision of spaces for charging plug-in and other ultra low emission vehicles. Option A seeks the provision of EV infrastructure on all residential developments and on non-residential developments that would provide additional parking spaces. It also includes the provision of EV parking for blue badge and car club parking bays. Option B goes further by including reference to design standards that could help to ensure that EV infrastructure does not cause harm to a particular local context, for example in Conservation Areas.

Background paper 012a

Transport: Traffic and Air Quality Modelling

This paper addresses: Transport Modelling
Relevant Local Plan Objective(s): • 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. • Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040 8. To reduce traffic and associated air pollution by improving travel choice, encouraging active travel, shortening journeys, and reducing the need to travel by car/lorry.
SEA themes: Air, Climatic Factors, Material Assets

1. Introduction	1
Context.....	2
Traffic Modelling	2
2. Strategic Road Network	2
Modelling outputs.....	2
Discussions with key stakeholders: National Highways	3
Discussions with key stakeholders: Natural England.....	4
3. Local Road Network	4
Modelling Outputs	4
Demand Management Measures	4
4. What this means for Oxford's Local Plan 2045.....	6

1. Introduction

- 1.1 This topic paper supplements Transport Background Paper (012). This paper begins by providing a short contextual summary of Oxford's traffic issues. It then goes on to discuss the traffic modelling undertaken (using the County Council's Oxfordshire Strategic Model)

in relation to the strategic and local road networks. It also highlights, in the case of the Strategic Road Network, discussions with relevant key stakeholders. It sets out how the use of traffic modelling has informed the development of the Oxford Local Plan 2045. Finally, it considers the implications of transport modelling that has been undertaken, on Oxford's Local Plan 2045, drawing some conclusions based on the findings.

Context

- 1.2 As a medieval city, Oxford's often narrow streets are unsuited to motorised vehicles – particularly to high levels of motorised vehicle use. In fact, peak period traffic congestion has been a persistent problem. Within the city centre for instance, a clear conflict exists between cars, buses and delivery vehicles, all of which compete for the limited available space with pedestrians and cyclists. The city's tightly drawn administrative boundary means that access to the Strategic Road Network (SRN) is limited to several junctions on the A34. More details can be found in Background Paper 012: Transport.

Traffic Modelling

- 1.3 The City Council has undertaken bespoke traffic modelling to look specifically at the impacts of planned growth contained within the Oxford Local Plan 2045, on the Strategic Road Network (SRN). This was carried out using the County Council's Oxfordshire Strategic Model (OSM). The OSM model outputs are expressed in terms of the change in Annual Average Daily Traffic (AADT) flows. This means they can be used to assess the impacts of planned growth in Oxford on the section of the SRN closest to Oxford – i.e. the A34. It is important to note that they are also very helpful in informing the air quality assessment as required by the Habitat Regulations Assessment (HRA).
- 1.4 In order to assess the impact of the Local Plan on the Local Road Network, the City Council has benefited from access to the local network modelling carried out by the County Council: [Oxford Trail Traffic Filters Transport and Traffic Forecasting Report \(October 2022\)](#). This modelling carried out to assess a [proposed demand management intervention](#) (see Background Paper 012: Transport for more details) takes account of assumed future growth across the five Districts of the County. For Oxford this modelling uses the levels of growth proposed in the Local Plan 2036, this included higher land use assumptions than are being proposed through the Oxford Local Plan 2045 (see section 4 below).

2. Strategic Road Network

Modelling outputs

- 2.1 Significance thresholds are used to determine when changes in traffic volume - often from new development - require further assessment. The "significance" thresholds for both transport assessment work and air quality work are 1,000 AADT or more for cars/ LGVs (Light Goods Vehicles) and 200 AADT or more for HDVs.

- 2.2 Table 2.1 below shows the predicted change in Annual Average Daily Traffic (AADT) flows on the A34 resulting from the growth proposed in the Oxford Local Plan 2045. These outputs show that the two-way change for cars/ LGVs, on the A34 (northbound and southbound) is 274 AADT, while the change in Heavy Duty Vehicles (HDVs) is –49 AADT.
- 2.3 The AADT changes identified in Table 2.1 are therefore below their respective “significance” thresholds, both for air quality assessment work and for transport assessment work. This means that as the modelled outputs are below each of their respective thresholds, the impacts are not likely to be significant. In this instance, the change in AADT is used as a proxy for changes to the critical load or level of certain pollutants (e.g., Nitrous Oxides – NOx).
- 2.4 An advice note, published by Natural England entitled ‘[Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitat Regulations](#)’ sets out that widely acknowledged Environmental Benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to the thresholds for changes in traffic flow, as set out in the Design Manual for Roads and Bridges.

Table 2.1 Change in AADT on the A34 resulting from the Oxford Local Plan 2045

	AADT (DS-DM) Cars/ LGVs	AADT (DS-DM) HDVs
A34 (northbound)	-48	-7
A34 (southbound)	+322	-42
Total (Two-way change)	+274	-49

Source: Oxford City Reg. 19 Habitat Regulations Assessment

Discussions with key stakeholders: National Highways

- 2.5 Following representations made by National Highways at Regulation 18 stage of the Local Plan (a summary of which is contained in the [Oxford Local Plan Regulation 18 Stage Consultation Report](#)), City Council Officers met with colleagues from National Highways on 15 October 2025 to discuss the key issues raised.
- 2.6 At the meeting, officers explained that the neither the total (two-way) change, nor the individual (northbound or southbound) carriageway changes in AADT, exceeded the significance thresholds set out above (i.e., 1000AADT or more change for cars/ LGVs; or 200 or more change for HDVs). At the meeting, both parties agreed that all of the issues raised as part of the National Highways response to the Regulation 18 consultation had been satisfactorily resolved. Following the meeting, the City Council Officers provided colleagues from National Highways with a short note of the meeting which set out the key issues that were discussed, a short, written response those issues, and a note of the outcomes of the meeting.

- 2.7 On 4 November 2025, National Highways confirmed that they were happy with the note, which confirmed that all the issues raised within National Highways' response to the Oxford Local Plan Regulation 18 consultation had been satisfactorily resolved. One final point to note is that, at the meeting, both parties recognised the value of producing a Statement of Common Ground as a way of formally documenting the agreed position of each organisation going forward. The intention is to agree a Statement of Common Ground between National Highways and Oxford City Council on the Oxford Local Plan 2045 to accompany submission.

Discussions with key stakeholders: Natural England

- 2.8 Following the Regulation 18 consultation, the City Council received a response from Natural England. City Council Officers have met with Natural England on a number of occasions. A detailed account of the correspondence with Natural England is set out in the Regulation 19 version of the Habitat Regulations Assessment.

3. Local Road Network

Modelling Outputs

- 3.1 The recent traffic modelling undertaken by Oxfordshire County Council (for the traffic filters project) has shown that, without intervention (i.e inclusive of predicted growth, but without the traffic filters project), there would be a negligible overall change to the current situation. Table 2.2 (below) includes data from the [Oxford Trial Traffic Filters Transport and Traffic Forecasting Report \(October 2022\)](#). It shows the predicted change in demand for car use both within, and to/ from the city between 2018 (the model base year) and 2024 (the assumed start year for the scheme (but without its implementation)).

Table 2.2 Sectorised demand for car use (12-hour period, 2018 BY vs 2024 DM)

Mode/ Sector	2018 BY	2024 DM	Change	% Change
Car (person trips)				
Within city	130,675	123,307	-7,368	-6%
To/ from city	159,323	164,909	5,586	4%
Combined	289,988	287,785	-2,213	-1%

(Source: Oxfordshire County Council, Oxford Trial Traffic Filters Report (October 2022))

- 3.2 Additional spatial analysis undertaken within the report showed the main changes in the city were the result of re-routing due to the six East Oxford Low Traffic Neighbourhood Schemes. The report noted that elsewhere in the city, there was generally no change in traffic flows, or in some cases, small increases and recognised that maintaining the existing situation would not address the existing challenges faced by the city.

Demand Management Measures

- 3.3 The County Councils "Core" Transport Schemes are a suite of transport demand management measures. These measures are needed because, on much of the city's road

network, the amount of traffic has resulted in significant congestion, and associated problems relating to air quality, public transport service reliability and cycle and pedestrian safety issues. On-going traffic congestion issues also impact the ability of the County Council to achieve the vision, aims objectives and headline targets set out in the Local Transport and Connectivity Plan, which include to:

- Reduce 1 in 4 car trips by 2030
- Deliver a net-zero transport network by 2040 and
- Have zero, or as close as possible, road fatalities or life-changing injuries by 2050

3.4 Given Oxford's medieval origins, there is insufficient physical space to overcome the city's long-standing traffic and congestions problems through engineering efforts (e.g., through increasing road capacity or the introduction of basic bus priority measures. The implementation of the comprehensive suite of transport demand management measures (included within County Council's "Core" transport schemes) has been shown to reduce demand for private car use in the city. The Core transport schemes include:

- Traffic Filters
- Low Traffic Neighbourhoods
- Workplace Parking Levy
- Zero Emission Zone

3.5 The Oxford Trial Traffic Filters Report (October 2022) considered the change in overall demand for a variety of different sectors. Table 2.3 (below) shows the predicted change in demand for car trips within and to/ from the city. It shows the changes in demand both with (2024 DM) and without (2024 DS) scheme implementation for the assumed scheme start year (2024).

Table 2.3 Sectorised demand for car use (12-hour period, 2024 DM vs 2024 DS)

Mode/ Sector	2024 DM	2024 DS	Change	% Change
Car (person trips)				
Within city	123,307	98,541	-24,766	-20%
To/ from city	164,909	162,973	-1,936	-1%
Combined	287,785	261,514	-26,271	-9%

(Source: Oxfordshire County Council, Oxford Trial Traffic Filters Report (October 2022))

3.6 The report shows that implementation of the traffic filters would reduce car person trips within the city by 20%. The spatial analysis accompanying the data shows that as a result of the route restrictions, car journeys through the city would be discouraged. This would result in a clear reduction of traffic volumes in the city centre, and on the majority of main 'arterial' routes into and out from the city centre, (e.g., Abingdon Road, London Road, Cowley Road). The report also showed reductions in traffic volumes at the Eastern Arc.

3.7 The reduction in some car person trips (particularly those to the city centre) would mean that some drivers would change their behaviour and travel by alternative modes (i.e., bus, rail, Park and Ride, walk or cycle). However, the report did note that there may be some

increases of traffic of the ring road, as drivers chose to divert their route away from the restricted roads. In this context, it is important to note that the Traffic Filters modelling impacts were factored into the assessment of the growth proposed in the Oxford Local Plan 2045 on the Strategic Road Network, discussed above.

4. What this means for Oxford's Local Plan 2045

- 4.1 Oxford is in a somewhat unique position in identifying site allocations, they tend to be located in with existing access to (or at least close proximity to) the current road network, thus not requiring critical site-specific infrastructure interventions to be delivered. The site allocations proposed within the Local Plan 2045 are generally of a non-strategic nature, i.e., no sites are allocated for more than 500 homes, and no 'new' land is proposed for employment uses. In addition, many of the plan's site allocations were previously allocated within adopted development plans.
- 4.2 The County Council's comprehensive suite of demand management measures, mean that even with the inclusion of the predicted level of growth, the modelled outputs have demonstrated sizeable reductions in car trips associated with the city's resident population.
- 4.3 The Oxfordshire Strategic Model (OSM) (which was used to undertake the traffic and transport modelling and analysis that underpins the County's assessment of the traffic filters) contains within it, regularly updated housing and jobs figures for Oxford city. At the time the traffic filters transport and traffic modelling report was produced (i.e., October 2022), the OSM contained the housing and jobs numbers (or 'land use assumptions') that were used to inform the adopted Local Plan 2036.
- 4.4 The traffic modelling undertaken to inform the Local Plan 2036 included higher land use assumptions than are being proposed through the Oxford Local Plan 2045. As such, the County Council's assessment of traffic filters included assumptions that 11,724 homes would be delivered in the plan period, and 944,939sqm of commercial floorspace. The Local Plan 2045 however has a lower housing requirement (9,267 homes) and less commercial floorspace (circa 550,000sqm) than was assessed in the County Council's traffic and transport modelling that was undertaken to support the traffic filters. Therefore, even with the later end date and accounting for previous delivery, the transport model factors in the assumed growth level to 2045.
- 4.5 As such, given that the traffic and transport modelling undertaken that underpins the suite of demand management measures being implemented by the County Council already includes, embedded with the modelled scenarios, more homes and jobs than are proposed within the Oxford Local Plan 2045. This, coupled with the inclusion of the bespoke traffic modelling undertaken for the primary purposes of Habitat Regulations Assessment. Also, by virtue of the location of the Oxford Meadows SAC, has assessed the impact of the Local Plan 2045 on the SRN.

- 4.6 As set out above, the package of demand management measures being implemented by the County Council, is the most suitable intervention for the levels of growth proposed in the Local Plan 2045 and the specific circumstances (outlined above) within Oxford.
- 4.7 It is worth noting that although the traffic filters trial has not yet commenced, the County Council has introduced a temporary congestion charge at the locations where the traffic filters are to be sited. While the temporary congestion charge was only introduced in October 2025 so, at the time of writing has only been operational several months, early indications are that traffic volumes in the city (particularly in the city centre), are lower, with associated traffic reductions at the main arterial routes into and out from the city. This, as predicted in the report, has increased the reliability of bus services as well as reducing traffic congestion, and its associated issue.

Background paper 013

Liveable city

This paper addresses community and cultural facilities, healthcare, schools, leisure and recreation and retail.
Relevant Local Plan 2045 Objectives: • 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.
Relevant SA Objective(s): 6. To provide accessible essential services and facilities .
SEA theme(s): Material Assets, Human Health

1. Introduction	1
2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	2
National and international context	2
Oxford City Council's Thriving Communities Strategy	4
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	5
Existing community and leisure facilities	5
Existing Schools and Colleges	7
Existing GP practices	8
Importance of retail to Oxford's economy	8
Changes in shopping habits	8
Footfall and vacancy rates	9
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of the Sustainability Appraisal)	9
5. Key issues addressed through the Local Plan 2045	9
Introduction	10
Town centre uses	10
Community, cultural, leisure and learning facilities	11
Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres	13

Policy options set 013b (Draft Policy C2): Maintaining vibrant centres	16
Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities	17
Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities	20
Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions.....	22
Policy options set 013f (proposed policy C4): Provision of New Learning and Non- Residential Institutions.....	25
Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions	26
Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions	28

1. Introduction

1.1 This paper focuses on Oxford as a liveable city looking more specifically at the community and cultural facilities that help foster a sense of community and belonging, enhancing health and wellbeing.

1.2 The paper provides a context for considering the subject by providing a brief summary of the relevant national and local plans, policies and programmes that currently exist and will influence change in the future. This paper identifies some of the key challenges and future trends that will impact on these facilities. The paper then explores what would happen without a plan and the potential difficulties that the city would face.

2. Policy Framework/ Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National and international context

National Planning Policy Framework (NPPF)

2.1 The NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 recognises that this comprises achieving three overarching objectives, which are independent but need to be pursued in mutually supportive ways. These comprise economic, social and environmental objectives. The social objective is required 'to support strong, vibrant and healthy communities, ... and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being' (para 8b); 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of development, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure)' (para 20). 'Non- strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level....' (para 29). Chapter 8 of the framework addresses the promotion of healthy and safe communities suggesting that planning policies and decisions should aim to achieve healthy, inclusive and safe places which 'enable and support healthy lives...' (para 96c).

2.2 The framework also states that 'to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should a) plan positively for the provision and use of shared spaces, community facilities (such as

local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services' (para 98). Finally the framework suggests that 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed' (para 200).

Oxford Local Plan 2036

2.3 The [Oxford Local Plan 2036](#) is the current adopted Local Plan. The policy approach to cultural and community facilities is to make accessible a diverse range of facilities; seek to protect existing facilities; and support improvements and more intensive use of existing sites. Section 8 contains strong policies to help realise this strategy:

2.4 Policy V7 on infrastructure and cultural and community facilities seeks to improve access to social and community infrastructure in particular from new development and protect and retain existing cultural and community facilities. The policy also indicates that planning permission will be granted for the alteration and expansion of existing schools, primary healthcare facilities and community centres; and that new schools, primary healthcare facilities and communities centres will receive planning permission where the City Council is satisfied that a number of criteria have been met.

2.5 Policy G5 on existing open space, indoor and outdoor sports and recreation facilities seeks to protect indoor sport and leisure facilities. The policy also indicates that the City Council will, where the opportunity to do so arises, seek public access to private and institutional facilities (e.g. those owned by colleges and private schools) through sharing schemes and joint user agreements. This is considered further within the Public Open Space and Outdoor Sport topic paper.

Corporate Plan

2.6 [Oxford City's Council's Strategy 2024-28](#) was approved by the Council's Cabinet in July 2024. Its five priority areas of focus are:

- Good, affordable homes;
- Strong, fair economy;
- Thriving communities;
- Zero Carbon Oxford; and
- Well-run Council

2.7 To help support thriving communities the Council Strategy aims to focus on areas of highest inequality to improve health, wellbeing, skills and employment opportunities and equal access for everyone. The priorities are:

- working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities
- Championing diversity and inclusion in our own work and community partnerships
- Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions

2.8 The strategy is designed to be used as a framework to guide thinking and decision-making and resource allocation. To support the delivery of the strategy, the Council will produce an annual Business Plan that will set specific priorities for the year ahead and report on progress against agreed key performance indicators. In turn, the Business Plan will be complemented by Oxford City Council's annual Budget that will allocate resources against the priorities set.

[Oxford City Council's Thriving Communities Strategy](#)

2.9 The [Thriving Communities Strategy 2023-2027](#) brings together leisure, culture, and Oxford City Council's work with communities to tackle inequalities. These inequalities are detailed in [Oxfordshire's Joint Strategic Needs Assessment](#) (June 2023) which provides information about the county's population and the factors affecting health, wellbeing, and social care needs. The City Council aims to tackle inequalities by encouraging well-designed neighbourhoods and parks where healthy lifestyles are the norm (sometimes called healthy place shaping), developing skills, ensuring growth is inclusive, strengthening communities and improving access. The strategy is about connectivity and collaboration – ensuring we effectively join up our efforts to help create a more equal city. The strategy sits alongside the Housing, Homeless and Roughsleeping Strategy, Citizen Experience Strategy, Oxford's Economic Strategy, and the Net Zero Action Plan.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Existing community and leisure facilities

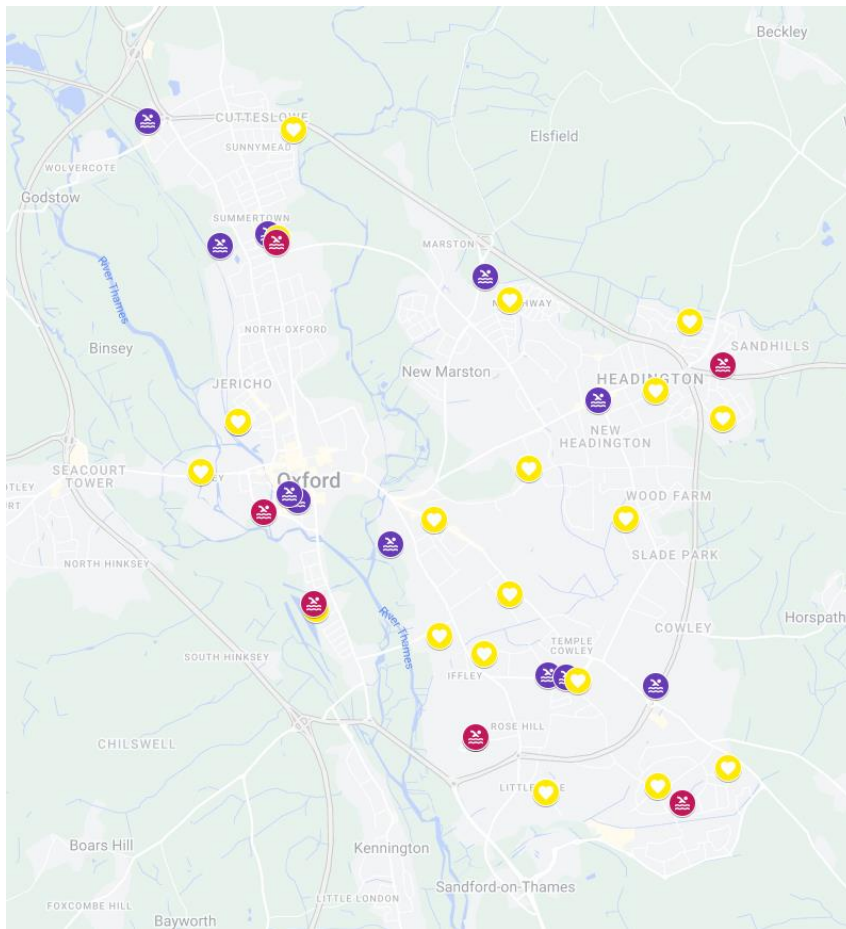


Figure 1. Existing community and leisure facilities ([Google, 2024](#))

-  City Council leisure centre
-  Commercial leisure centre
-  Community centre

3.1 Oxford's leisure centres provide a range of indoor sports including swimming pools, gyms, sports halls, crèches, spinning studios, children's soft play, community and group exercise halls and squash courts. A number of these leisure centres operate on a commercial basis (e.g. provide private membership options). Some leisure centres also provide opportunities for outdoor sports but this is not addressed within this topic paper.

3.2 Oxford City Council Leisure Centre Locations:

- Barton Leisure Centre,
- Ferry Leisure Centre,
- Leys Pools and Leisure Centre,
- Rose Hill Community Centre Gym,
- Hinksey Heated Outdoor Pool,
- Oxford Ice Rink

3.3 There are 23 community centres located across the city owned by the City Council but managed by Community Associations: Barton Neighbourhood Centre, Blackbird Leys, Bullingdon, Cheney, Cuttleslowe, Donnington, East Oxford, Florence Park, Headington, Jericho St Barnabas, Jubilee 77, Littlemore, North Oxford, Northway Sports Centre, Regal, Risinghurst, Rose Hill, South Oxford, The Asian Cultural Centre, The Venue@Cowley, West Oxford, and Wood Farm Community Room. These community centres offer welfare, educational and recreational activities that residents can get involved in. These can include health and fitness opportunities (e.g. yoga classes), sports (e.g. judo and dance), dedicated groups/sessions for parents and children and the elderly, junior and youth entertainment (e.g. Scouts and Guides) and religious groups. Tenants are granted community leases subject to a number of criteria being met by applicant organisations.

3.4 In addition to leisure and community centres there are a number of commercial facilities in the City that overlap with leisure. These include cinemas and theatres, public houses (including social enterprise venues), live music- venues, nightclubs, bowling, karting, laser combat, private leisure centres/ gyms, children's soft play areas (Partyman), escape rooms, indoor golf and cricket and climbing walls.

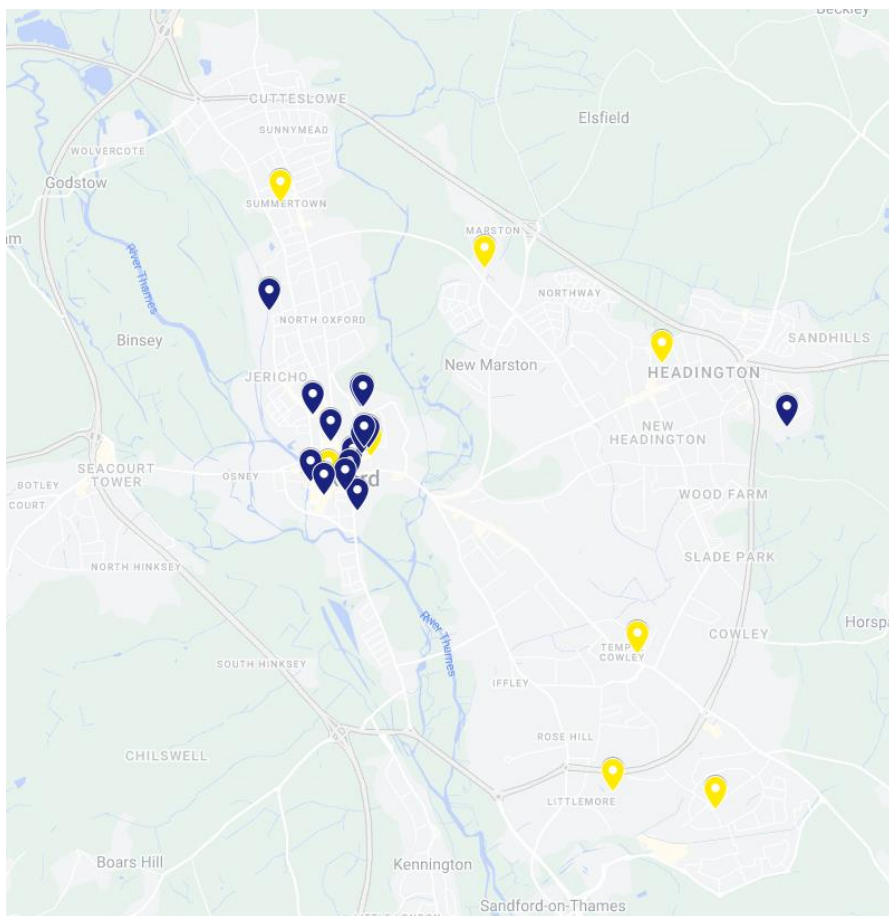


Figure 2: Existing Cultural facilities in Oxford (Google 2024)



Museums and Attractions



Libraries

3.5 Cultural facilities in the city include 8 libraries (Barton, Blackbird Leys, Cowley, Headington, Littlemore, Old Marston, Oxford Westgate and Summertown), 13 museums and numerous places of worship. Some of these facilities are commercial, e.g. Theatres, and some venues are linked to the universities. Oxford City has a rich variety of religious communities. As well as offering dedicated places of worship many of the religious facilities offer opportunity for more general community use in a similar way to community centres e.g. church halls.

3.6 There are also a number of leisure and community facilities across the City's schools and universities which are made available for community use through user agreements. There are clearly links between leisure and community facilities and infrastructure: further information can be found in the Infrastructure Topic Paper (015).

Existing Schools and Colleges

3.7 Oxford has over 50 primary schools which are well distributed across the city, allowing easy access to local schools. Secondary schools in Oxford are also distributed fairly evenly across the city, meaning they are also easily in reach of where people live. Secondary schools include Cheney School, Greyfriars Catholic School, Matthew Arnold School (just outside the city boundary, in Botley), Oxford Spires Academy, The Cherwell School, The Oxford Academy, and The Swan School. In addition, there are a number of public schools across the city. The secondary schools vary considerably in terms of their performance. In 2025 (the most recent year performance comparison information is available for) the Cherwell School had an attainment 8 score of 58.3, well above the English state school average of around 46. At the other end of the scale, The Oxford Academy had an attainment 8 score of 33.5, which is below average.

Existing GP practices

3.8 The 2022 Health and Care Act set up new Integrated Care Systems (ICSs) across England, with each ICS having two core parts, an Integrated Care Board (ICB) and an Integrated Care Partnership (ICP). Oxford city is part of the NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB). The ICB decides how to spend the NHS budget and plans how to improve people's health, deliver high quality care and get better value for money.

Importance of retail to Oxford's economy

3.9 Oxford is a sub-regional centre which provides a wide range of services and facilities to both the city's residents and those living in the sub-regional catchment area. As such it plays an important role in Oxford's economy. The vibrancy and vitality of Oxford's centres needs to be maintained and enhanced in the future to ensure that they can continue to perform their function and continue to make a significant contribution towards the economic, social and environmental objectives for achieving sustainable development. Oxford is a world-class city with a prosperous economy and a historic core that attracts tourists from around the world. The city centre fulfils many functions both regional and local and will continue to be the main focus for retail together with a wide range of leisure and cultural uses.

Changes in shopping habits

3.10 Retail patterns and behaviours have been changing in recent years with a growth in online shopping, which was only accelerated by the impacts of the Covid-19 pandemic. However, market predictions indicated that there will still be an important role of destination shopping where shopping becomes part of a broader day out linked with eating out and other

leisure activities. When online shopping is so easy there must be other draws to encourage people to visit centres.

Footfall and vacancy rates

3.11 The continued success of Oxford city centre is highly reliant on footfall from tourists, students and office workers, although the impact on spend is not that closely linked to footfall in Oxford, as many of those who usually visit the city centre are not high spenders. For example, students, day tourists and office workers contribute to a lot the footfall in the city centre in normal times, but do not spend very much money. The Authority Monitoring Report 2023/24 shows a city centre footfall comparison of the 2022/23 and the 2023/24 monitoring periods. This comparison shows that for the majority of the year footfall is higher each month during 2023/24 than 2022/23. On average 2023/24 saw more than 100,000 more people per month than in 2022/23. The highest footfall was in August 23, with about 3 million people recorded over that month, surpassing pre-pandemic levels. The vacancy rate of units in the city centre was 5.6% in 2023, compared to an average of 12.5 across the south. This compares to 12.6% in September 2020.

3.12 Therefore, there are many signs that change can be managed in a way that is bespoke to the city's needs, and that will maintain a successful and vibrant centre. The flexible policies introduced in the Oxford Local Plan 2036 have enabled us to respond to the changing retail scene in a way that is appropriate to Oxford; for example the conversion of the Boswell's department store to a hotel has maintained an active frontage with a restaurant open to the public on the ground floor.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of the Sustainability Appraisal)

4.1 It is important that we continue to protect and enhance the city's existing leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use (e.g. housing). This could be detrimental not only to people's health but also their wellbeing. In the absence of a new Local Plan, we would be reliant on the planning policies within the existing Local Plan 2036. Beyond 2036 it would only be national policies that would offer protection and these may not necessarily be detailed or specific enough to protect the diverse range of leisure and community facilities across the city. It seems that demand for retail and service floorspace in key locations such as the city centre and district centres may reduce and change in the future, reflecting the continued growth in online shopping and changes to working practices.

5. Key issues addressed through the Local Plan 2045

Introduction

5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to liveable city objectives. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan. The approaches in the submission draft Plan align with the preferred approaches at Regulation 18.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

5.3 The retail and service sector play an important role in Oxford's economy and help to offer a range of job opportunities to local people. The city centre is an important destination for visitors from both overseas and the UK, and is attractive for business trips and conferences. The city centre, district centres and local centres provide a diverse range of uses and services, including retail, pubs, restaurants and offices, together with cultural and entertainment venues, which are important to the functioning of a city and people's well-being. These help to meet the needs of local residents, visitors to the city and those working in Oxford.

5.4 Opportunities for new cultural, community and entertainment uses, together with those in the hospitality sector and residential where appropriate could potentially be at the forefront of a renaissance in the city's key centres.

Town centre uses

5.5 Whilst there may be a move to online shopping, our city centre and local centres have been and will continue to be important for people socially. There are also advantages in terms of clustering uses that attract a lot of people in accessible locations so that a variety of needs can be met in one place, making travel simpler and more likely to be by sustainable modes. The uses also then help to support each other and maintain the strength of these centres, helping them thrive.

5.6 Policy C1 requires new town centres uses to follow a sequential test that looks to locate town centre uses in the defined centres first, and only if it can be shown that there

are no suitable opportunities in these centres may edge of centre and then other locations be considered. This is to try to keep a concentration of uses in the centres, trying to avoid competition that draws people away from established centres, and trying to avoid town centre uses in locations that are not well served by sustainable travel modes. Town centre uses are defined in the NPPF and include a wide range of uses such as shops, restaurants, gyms, health centres and offices. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres.

5.7 Retail is no longer a specific Use Class, and the introduction of Use Class E for most commercial uses allows significant flexibility in existing centres. In the Oxford Local Plan 2036, retail frontages were protected. The approach of the Oxford Local Plan 2045 Policy C2 is to protect active frontages at ground floor level, with a threshold percentage of Use Class E. This is to ensure continued activity and interest in these centres so they continue to support and offer a range of facilities and act as a hub.

5.8 To be able to apply this approach it is necessary to define the centres. Being a compact city, Oxford already has a range of centres that are in easy reach of people across the city. If local centres are defined, these should be considered the same as district centres and the city centre in terms of them being a preferred location for town centre uses. However, the NPPF is very clear that it should not include small parades of shops of purely neighbourhood significance.

Community, cultural, leisure and learning facilities

5.9 The importance of adequate availability of community and cultural facilities is evident. The functions they provide can be as a meeting place, a place for leisure and fitness, a place for community and interest groups to meet and so on. Cultural community and leisure facilities help to support strong communities, healthy lifestyles, wellbeing, and a sense of community and belonging. There has been a change in the cultural and leisure landscape as a result of Covid-19, which has in some ways perhaps just accelerated changes. It is important that we continue to protect and enhance the City's existing cultural, educational, leisure and community facilities, otherwise there is a risk that these facilities could be lost to or replaced with another land use. This could be detrimental not only to people's health but also their wellbeing Policies C3, C4 and C5 set criteria to ensure new facilities are located appropriately and potential impacts are mitigated. Existing facilities are also protected. Some flexibility is built-in to ensure changes in needs can be responded to, and to allow, for example replacement facilities that are equally accessible that are achieved by combining and sharing spaces in an enhanced and improved facility, ensuring the most efficient use is made of assets.

Appendix A- Policy options and preferred approaches

Policy options set 013a (draft policy C1): Focusing Town Centre Uses in Existing Centres

Table 1: Policy options set 013a: Focusing Town Centre Uses in Existing Centres

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Allow and protect town centre uses in the city centre, and district centres first.	This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, and helps ensure that facilities are focused in these locations that can be easily reached by sustainable modes. The concentration of uses also means various needs can be fulfilled in one trip, encouraging people to stay longer. This approach helps to ensure town centre uses are concentrated in existing centres, where there are already good transport facilities (and other facilities such as public toilets, as well as parking for those who need to use it).	The wide range of uses allowed in district centres could lead to competing demands or a particular use could become dominant, which may not be that which is most needed by the community (for example student accommodation or hotels). The policy options relating to active frontages, below, will be important in mitigating this. Use Class E covers a wide variety of facilities, and it includes healthcare such as GPs. This approach would mean new GP surgeries would be expected to be located in district centres and would need to work through a sequential test to show other options are not feasible, which may limit options for locating GPs. However, it is important that GPs are easily accessible, so this approach is justified.
Option b As well as larger district centres, also define local centres.	Local centres are significantly smaller than the district centres, with less variety of uses, but they should be supported as they provide facilities locally in enough variety to serve a range of needs and they help ensure local access. These locations are less likely to be transport hubs and are more tightly woven into residential areas, so may need a slightly different policy approach to district centres.	These local centres vary in character. Defining them as centres means that restaurants and gyms could be introduced into quieter areas and they may attract more people than can easily access the centres.

Option c Apart from for town centre uses, distinguish between city and district centres and local centres in terms of the other types of uses permitted. For example, do not allow student accommodation in local centres, but in larger centres only (if local centres are defined, according to the NPPF they are 'town centres' and so suitable for all main town centre uses).	This ensures that the uses that are most likely to be unsuitable for smaller centres are concentrated only in larger centres, minimising disruption and negative impacts, whilst still encouraging town centre uses in smaller centres to maintain good access to facilities and services.	This limits sites available for sui generis uses, which might still be popular locally.
Option d Do not distinguish between centres at all and allow the same uses in any defined centre.	This increases the range of uses that would be accepted in local centres and increases the locations where needs for student accommodation, hotels and visitor and cultural venues could be met.	Local centres are small and not as suitable for hotel uses, visitor attractions and student accommodation. They generally don't have such strong accessibility and uses that attract a lot of people at once and are less compatible with quiet residential areas could create negative impacts.
Option e Require an impact assessment for retail and leisure proposals outside of centres of a smaller threshold than the default 2,500m² in the NPPF (currently required in OLP2036 for those of 350m² or more), demonstrating that there will be no adverse impact on the vitality and viability of the existing centres, and that there is good accessibility by walking, cycling and public	In the context of Oxford, a proposal of 2,500m² is large, and much smaller proposals outside of centres could potentially have negative impacts. This approach would pick up a larger number of proposals, ensuring negative impacts are avoided or mitigated.	This approach involves an oversight of a larger number of retail and leisure proposals.

transport, and potentially including other criteria such as that there would not be unacceptable harm to adjoining land uses.		
Option f Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.	The NPPF sets out this approach, so there may be no need to repeat it in local policy.	The NPPF references accessibility and connectivity to centres as criteria for assessing proposals but there are no other locally specific criteria. The Local Plan gives the opportunity to define centres and expectations for them.

Initial sustainability appraisal screening of options sets		
Is there only one option or are there various options we could take? - a, a with b, c with a&b, d with a&b, e with a/a&b/a&b&c, f High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: The NPPF directs town centre uses to town centres. The local plan can define these areas where town centre uses are to be directed. Town centres may or may not include local centres. There are uses that are not town centre uses that may be most suited to accessible locations. The options explore various ways of defining centres and suitable uses. The options relate primarily to criterion 6. Essential facilities, and criterion 12. Economic growth. Also, they are supporting of the air quality/transport criterion, because protecting centres/guiding uses to these areas helps to support a public transport network and helps people access their needs in sustainable ways. There are slightly different approaches within the options, but largely they all represent minor positives, apart from option for no policy which will be neutral.		

Focusing Town Centre Uses in Existing Centres – Proposed policy C1

The preferred approach for the Local Plan 2045 is to include a policy that defines the city centre, district centres and local centres. These centres should be the focus for new main town centre uses. The preferred approach is to distinguish between the larger centres and the local centres particularly in terms of student accommodation, which would not be considered suitable in the local centres.

The preferred approach is therefore a combination of **options A, B, C and E**.

Policy options set 013b (Draft Policy C2): Maintaining vibrant centres

As well as considering what types of uses should be permitted in what types of centres, it is necessary to consider how to protect those existing centres so that they remain vibrant and sustain people's local access to facilities and services.

Table 2: Policy options set 013b: Maintaining vibrant centres

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Designate frontages in the city centre and all district and local centres and require that a high proportion of this remains as Use Class E on the ground floor. The proportion to be set based on maintaining current thresholds, with some leeway for flexibility.	Having 'active' uses at the ground floor helps maintain the vibrancy of centres. Commercial, business and services are uses that attract a lot of people, so these are most beneficially located in the centres, where there are good transport connections, and where there is the benefit of people accessing a variety of facilities at the same time. There would still be a lot of flexibility with this approach to have other uses such as housing on the upper floors.	Permitted development rights that allow a change from Use Class E to housing could mean that the policy threshold is breached without any planning permissions being granted, and that would remove any flexibility for the remaining frontage, and limits the potential of the policy to maintain an active frontage. This will need a strong definition of an active frontage.
Option b Designate frontages in the city centre and all district and local centres but do not require a proportion to remain as commercial, business and services uses - only set criteria for what is expected in a ground floor frontage to bring activity and vibrancy to centres in terms of design and uses.	This approach allows complete flexibility, in the spirit of the change to the Use Class Order. It has flexibility to be applicable whatever future changes to the Use Class Order may occur. Criteria can help to ensure that shop fronts contribute to the design and character of existing buildings and their surroundings and give protection to Oxford's historic shopfronts.	Because the locations where many commercial uses can be located will be so limited, it is important to try to protect them where they are most suitable. Without this protection, there could be a weakening of district centres and the city centre as places where people can access a broad range of facilities at once, and easily, by walking, cycling and public transport.

Option c Do not designate active frontages.	Checking the proportion of active frontages, or assessing whether a proposal maintains an active frontage, does take some time, which would be avoided with this approach.	This approach does nothing to protect the vitality of local centres, so would not help to achieve the aim of a 15-minute city.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b or c, or a with elements of b High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts Screened in for detailed appraisal? - No Rationale: Key criteria are 6. Services and 12. Economic growth (keeping high streets alive), potentially indirect impacts on 11. Urban design. Option a and b are both likely to have a minor positive for criterion 6 and criterion 12 because it would support protecting thriving centres (local and district) and maintaining a vibrant street atmosphere. Option b potentially also might have a minor positive impact against 11. Urban Design because incorporating criteria could include considerations about design of shop fronts and reflecting local character. Option c (no local policy) means no protection and would be scored as a neutral impact (it would not actively make the frontages disappear, just means no further protection through local policy). Overall, these are not scoped in for detailed appraisal because impacts are unlikely to be significant.

Active Frontages – Proposed policy C2

The preferred approach for this topic is to include a policy that sets thresholds for the proportion of Use Class E (commercial use) to remain at ground floor level, and also to set criteria to ensure an active frontage. Ensuring a level of activity at street level is vital for the continued success of the centres, as is trying to maintain a range of commercial activity.

The preferred approach is therefore **Option A**, with elements of **Option B**.

Policy options set 013c (draft policy C3): Protection and Alteration of Existing Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table 3: Policy options set 013c: Protection and Alteration of Existing Local Community facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect local shared spaces and community assets with a policy that would resist their loss, unless set criteria can be met, for example they are to be replaced.	This approach recognises the importance of local community assets and shared spaces and that these make a valued contribution to the health and wellbeing of local residents. The starting position is that these should be protected from loss. The approach recognises that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate market-led research and evidence to be provided to underline this case. Promoting 15-minute city concepts is a key aspiration for the Local Plan, defining accessibility in these terms will help to ensure that any re-provision does not force people to use less sustainable modes of transport to continue to use the facility (e.g. car).	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need or overriding demand. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.

Option b Include a policy where planning will be granted for alteration and expansion of existing local community assets with relevant evidence from market research, although potentially preventing F2 shops from expanding so they become Use Class E and could be lost to housing or other commercial uses.	This would recognise the particular importance of community assets to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service.	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.
Option c Do not have a policy protecting local community assets - rely on national policy, or future national development management policies.	The NPPF does provide support for the provision of ‘accessible services’ that reflect current and future needs and support communities. It highlights the importance of achieving healthy, inclusive and safe places which ‘enable and support healthy lifestyles’ and ‘promote social interaction’. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? -

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: With the absence of a specific national policy, it would be appropriate to consider having a policy. The local context supports the inclusion of such a policy, with several potential approaches for its formulation. The options under consideration by the Council explore different strategies for protecting and modifying existing community facilities. These approaches aim to safeguard these facilities, ensuring they are preserved unless it can be demonstrated that they are no longer needed or that a suitable replacement exists.

In terms of sustainability impacts, the different options all score against **criterion 5. inequalities** and **criterion 6. services and facilities** and the level of sustainability impact is unlikely to vary significantly between the options. Option a would have a neutral impact as it offers a cohesive approach to protecting existing local community facilities and outlines a strict criterion which needs to be met in order for the loss of a facility. However, there is still a chance that a community facility could be lost which poses social inequality and health threats, outlined in criterion 5, as communities won't have easily accessible facilities to socialise and exercise. Option b offers a minor positive impact as there is opportunity to expand and alter existing facilities without the risk of development becoming all Class E, preventing the loss of community facilities to housing and commercial use. This also limits the likelihood of social and health inequalities occurring. Option c would have a neutral impact as it would rely on national policy. Although there is no direct national policy, the NPPF does promote healthy and safe communities - it just doesn't outline how to achieve this. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

Protection, alteration and new local community facilities – Proposed policy C3

The preferred approach for policy addressing community facilities is to generally support new facilities in accessible locations, encouraging community use of facilities if they are private. The preferred approach is also to protect existing facilities unless strict criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities to local communities.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013d and A and B of option set 013c.**

Policy options set 013d (proposed policy C3): Provision of New Local Community Facilities

Local Community Facilities include local shops, meeting places, sports venues, ancillary open space, cultural buildings and public houses. These uses can be very important to communities and individuals.

Table 4: Policy options set 013d: Provision of New Local Community Facilities

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Generally, support the provision of new local community assets in the city. These should be in an accessible location by walking, cycling and public transport.	These facilities can form an important part of the social fabric of an area, and can support positive health and wellbeing both physical and mental. In combination with option A of Protection and Alteration options above, which seeks to protect existing space, this option would support new facilities coming forward where these would make a positive contribution to the city. Promoting active travel through walking/cycling as part of an accessible city is a key aspiration in the Local Plan.	Whilst this option would support provision, it would not define exactly what is needed and where. Community assets would not always automatically be approved, which would be because they were not suitable, but which may limit opportunities.
Option b Seek to secure community use agreements on all new community and leisure facilities, particularly those within schools and colleges, as well as existing facilities that come forward for redevelopment.	There are a range of private sports facilities in the city which offer limited public use as well as those that are entirely restricted to members of those institutions, including schools and colleges. Where access is opened up to the wider community, this could help improve the range of access to facilities.	Management and operational requirements of certain private facilities, such as those belonging to schools and colleges may restrict wider access for safety/ security reasons. It is likely that community use agreements would need to be explored on a case-by-case basis.
Option c Do not have a policy addressing provision of new local community assets; rely	The NPPF does provide support for the provision of 'accessible services' that reflect current and future needs and support	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this

on national policy, or future national development management policies.	communities. It highlights the importance of achieving healthy, inclusive and safe places.	requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? -

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts

Screened in for detailed appraisal? - No

Rationale: In terms of options, it would be appropriate to consider having a policy as there is no specific national policy or guidance. Local context supports the inclusion of some sort of policy, with potential options for how best to formulate a policy. The options that the Council have considered represent various approaches to setting policy for the provision of new local community facilities.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities** and the level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it allows new facilities to come forward. Option b would also have a slight positive impact as it would ensure public access to new or existing and expanded facilities. Option c would have a neutral impact as it would rely on national policy. There is no direct national policy, but it does promote healthy and safe communities. Whilst option a represents a cohesive policy approach, some of the options (options b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b as this would be less likely to stand alone and option c is less likely to be incorporated at all. There is also a sustainability impact link to **criterion 5. inequalities** as option a is trying to encourage new facilities to come forward and option b is looking at opening up access to previously private facilities to the wider community. This can facilitate social inclusion and access to recreational facilities which in turn links to good health. Whilst options a, b and, c represent three alternative approaches, some of the options (option a and b) are not strictly alternatives, but rather additional options for a policy to cover and, whilst option a could stand alone, it could also be incorporated alongside option b, as option b is less likely to stand alone. Option c would unlikely be implemented. Overall, the sustainability impacts are not considered significant for any of the criteria, regardless of the option. Additionally, the relevant SA criteria associated with these impacts do not differ notably between the options, so a detailed assessment is not deemed necessary.

Policy options set 013e (proposed policy C4): Protection and Alteration of Learning and Non-residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table 5: Policy options set 013e: Protection and Alteration of Learning and Non-residential Institutions (including Schools, Libraries and Places of Worship)

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect existing learning and non-residential institutions with a policy that would resist their loss, unless justified by meeting a set of criteria such as that there is no longer a need or it is no longer feasible in that location, and/or that suitable re-provision can be made.	This approach recognises the importance of learning and other non-residential institutions. These make a valued contribution to the health and wellbeing of local residents and also are important in learning and skills development, potentially helping overcome inequalities. The starting position is that these should be protected from loss, but this approach is flexible, recognising that there may be times when existing facilities are no longer needed, or could be replaced with alternative provision that meets a greater need in the local area. It allows for flexibility in such incidences but would require appropriate evidence to be provided to underline this case.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Set out that permission will be granted for alteration and expansion of existing learning and non-residential institutions.	This would recognise the particular importance of learning and non-residential institutions to local neighbourhoods and would provide added certainty that applications for development on these sites that would enable them to expand or to provide a better level of service.	The constrained nature of many sites in the city means that, in reality, it may be difficult for many of these facilities to expand – thus the policy may have limited benefit.

Option c Do not have a policy protecting learning and non-residential institutions- rely on national policy, or future national development management policies.	The NPPF does provide support for the provision and use of community facilities (such as public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. It identifies that planning policies should guard against the unnecessary loss or valued services and facilities, particularly where this would reduce the communities ability to meet its day-to-day needs. It is likely that new national development management policies could set out a framework for when loss of facilities is acceptable and may make a local policy redundant.	This option does not provide detailed guidance and advice on how this provision should be made. The Local Plan is the policy vehicle for ensuring that this requirement is planned for to meet the needs of both existing and future demand.

Initial sustainability appraisal screening of options sets Is there only one option or are there various options we could take? - a, b, a and b, or c High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts. Screened in for detailed appraisal? -No Rationale: The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for educational infrastructure (paragraph 20). Previous evidence suggests that it is likely that need over the plan period can be met on existing sites, but it will be important that sites are protected. The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to criterion 6. to provide accessible essential services and facilities and criterion 5 to reduce poverty, social exclusion and health inequalities. The level of sustainability is unlikely to vary significantly between the options. Option a would have a minor positive impact as it protects existing uses in most cases. Option b would also have a slight positive impact as it would support expansion of existing facilities. Option c could have a negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.

Protection, alteration and new learning and non-residential institutions – Proposed policy C4

The preferred approach for policy addressing learning and non-residential institutions is to generally support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities unless, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

The preferred approach in the draft Local Plan is therefore a combination of **options A and B of option set 013e and A of option set 013f.**

Policy options set 013f (proposed policy C4): Provision of New Learning and Non-Residential Institutions

Schools, libraries and places of worship all play an important part in servicing the needs of Oxford's communities so their protection is likely to be important. These uses generally fall into Use Class F1 of the Use Class Order 2020.

Table 6: Policy options set 013f: Provision of New Learning and Non-Residential Institutions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include criteria for assessing the suitability of proposals for learning and non-residential institutions such as schools, with criteria for assessing the suitability of unallocated sites that may be proposed for these uses, which will include issues such as likely impacts on amenity and traffic and whether they can be mitigated, including access,	Whilst these uses will always bring benefits to the community, there is potential for them to be sited in unsuitable locations, where traffic is generated, where there are problems with access or it causes disruption to local residents; this approach would prevent that happening.	This could prevent much needed uses coming forward if the site is assessed as not suitable.

accessibility, size of site and neighbouring uses.		
Option b Restrict the locations where these uses would be allowed, for example to defined centres only, or to arterial roads and centres.	Some broad location types will, by their nature, be more likely to be suited to this kind of use, and this policy approach is upfront about those, reducing the need to assess against broad criteria.	This may rule out sites which would be very suitable for these beneficial uses.
Option c Do not have a policy for provision of new learning and non-residential institutions.	These uses bring benefits for the community, and this approach maximises the flexibility for them to be brought forward, in any location (suitable as long as other policy requirements are met).	This could lead to proposals in unsuitable locations, which generate traffic, have access issues, which are not close to other facilities for linked trips and which are not as easily accessible.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? - a, b, a and b, or c High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts. Screened in for detailed appraisal? -No Rationale: The NPPF says that a positive approach should be taken to meeting communities' needs in terms of education and development that will widen choice in education. However, it is also the case that not all locations are likely to be suitable for this type of development. Options are therefore set out that explore potential policy approaches to new learning and non-residential institutions, that supports them to varying degrees and that also ensures they are in appropriate locations. The options that the Council have considered represent various approaches to setting policy for the provision of new learning and non-residential institutions. In terms of sustainability impacts, the different options are all relevant to criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inequalities. The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option c, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Provision of the facilities depends on them coming forward, so all options have a neutral to mildly positive impact.

Policy options set 013g (Draft Policy C5): Protecting Cultural, Social and Visitor Attractions

Most cultural venues and visitor attractions such as theatres, nightclubs, pubs, casinos and concert halls are classed in the planning system as ‘Sui Generis’, which means use cannot switch to or from them without planning permission and proposals can all be considered on their own merits. These attractions can be important to people’s experience and enjoyment of the city, both for visitors and residents, which may warrant their protection, with varying needs of flexibility as it will be necessary to respond to changing interests and demand.

Table 7: Policy options set 013g: Protecting Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Protect cultural, social and visitor attractions in their current use, and include a criteria-based policy that only allows their loss or change to another attraction or community use if justified against a clear set of criteria that includes requirements for viability and marketing evidence, or replacement.	This approach would help guard against the loss of valued social, recreational and cultural facilities. It would help ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. It is important that evening economy uses can flourish and co-exist with other uses especially where they are found near one another.	It will be difficult to be specific about what evidence would be sufficient to be used to demonstrate that there is no longer a need, or overriding demand, or it is no longer feasible to continue. It is likely to differ from case-to-case, but more guidance may be helpful in providing clarity in such situations.
Option b Protect cultural, social and visitor attractions for those uses (but not necessary the exact use they are in, for example a cinema could be	This approach continues to protect facilities that may be important to people in the local area, or wider area, whilst allowing greater flexibility to respond to changing tastes and demand, for example if visitor numbers to cinemas has fallen so much as to affect their	This would mean that facilities such as pubs, which can be very important to local communities, could potentially change to an attraction that may attract more visitors, but which does not perform the same community function. Facilities such as pubs are often not in centres, so their change to

lost to a pub, or even loss to a community facility could be set out as acceptable in principle). This approach would still include a criteria-based policy that only allows their loss if justified against these.	viability, a currently more popular use would be allowed in principle (subject to other policies and criteria being met).	another use, which is essentially a new use, could conflict with policies that try to direct these uses that attract lots of people to the defined centres.
Option c Do not include a policy that protects existing venues.	This approach leaves the market to respond flexibly to demands and market conditions.	This approach would not help guard against the loss of valued facilities and venues.

Initial sustainability appraisal screening of options sets	
Is there only one option or are there various options we could take? - a, a and b or c High-level screening conclusion? - the options are similar to each other and are unlikely significant sustainability impacts. Screened in for detailed appraisal? - No Rationale: The NPPF requires that strategic policies set out an overall strategy that includes sufficient provision for cultural infrastructure (paragraph 20). The options that the Council have considered represent various approaches to setting policy for the protection and expansion of existing cultural, social and visitor attractions. These options most directly relate to criterion 12. Economic growth, particularly the element that relates to cultural provision and tourism and to criterion 6. to provide accessible essential services and facilities and criterion 5 to reduce poverty, social exclusion and health inequalities. Having a policy has a minor positive impact, helping to ensure these facilities are protected for the benefits they provide in terms of jobs, attracting visitors to the city and contributing to social and cultural well-being. Option c could have a minor negative impact, as only national policy could be relied on if loss of a facility was proposed, and there is a risk facilities could be lost.	

Policy options set 013h (Draft Policy C5): Provision of New Cultural, Social and Visitor Attractions

Related to options set 013g about protecting cultural, social and visitor attractions, this options set considers provision of new attractions – what types and where they might be most suitable, and bring most benefits.

Table 8: Policy options set 013h: Provision of New Cultural, Social and Visitor Attractions

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses. This may specifically encourage some Sui Generis uses that are considered will fill gaps in provision or be particularly beneficial.	Potential benefits include prevention of impacts such as congestion and providing economic opportunities from locating new uses in accessible and sustainable locations.	The design of new facilities would need to be carefully considered otherwise there could be a potential for conflict with Oxford's historic assets, which has the potential to undermine the city's historic character. Allows for possibility of locating tourist assets away from existing transport hubs.
Option b Allow new cultural, social and visitor attractions in defined centres only.	This approach would continue to encourage new facilities in the most sustainable and accessible locations. In these locations, they also have potential to attract people who will use the other existing facilities of these centres and help to support them. This gives further potential to enhance the vibrancy of the city and district centres.	Potentially increases pressure in these centres as so many uses would only be allowed there. That may also limit these facilities because of competition for a limited number of sites. Has the potential to reduce variety of uses in these locations.

Option c Do not allow new cultural, social or visitor attractions	This could limit the negative impacts of visitors and tourists on Oxford's transport system and communities.	This approach would have a potential negative impact to Oxford's tourism industry and economy. It may not limit visitors, but would just limit their experience. It was also limit opportunities for residents. It could contribute to a decline of the city centre and district centres, with fewer visitors. It would limit opportunities for new attractions that may contribute to the wider understanding and appreciation of Oxford's unique history or increase its accessibility to people and opportunities for enjoyment.
Option d No Policy. Rely on other policies in the Local Plan and national policies where applicable.	Provides flexibility for the provision of these uses.	Reliant on other policies to mitigate any potential negative impacts on transport, heritage, and wider environment.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? - a, a & b, b, c, d

High-level screening conclusion? - the options are similar to each other and are unlikely to have significant sustainability impacts.

Screened in for detailed appraisal? -No

Rationale: The NPPF says that plans should take into account and support the delivery of local strategies to improve society and cultural well-being. Therefore it is appropriate for options to explore potential policy approaches to support these facilities to varying degrees and that also ensures they are in appropriate locations. Visitor attractions and cultural facilities can attract large numbers of people and therefore have impacts on local amenity, and it is important they are accessible. The options that the Council have considered represent various approaches to setting policy for the provision of new cultural, social and visitor attractions.

In terms of sustainability impacts, the different options are all relevant to **criterion 6. to provide accessible essential services and facilities and to criterion 5. to reduce poverty, social exclusion and health inequalities and 12. Economic growth**, particularly the

element that relates to cultural provision and tourism. The level of sustainability is unlikely to vary significantly between the options. Option a and b allow new facilities to come forward, but with certain restrictions to ensure they are appropriately located. Option d, which is to have no policy, means that proposals would be assessed against other policies of the plan and the NPPF, which would be generally positive. Option c allows no new facilities, but would not affect directly existing facilities, which already ensure a range of provision.

Protection, alteration and new learning and non-residential institutions – Proposed policy C5

The preferred approach for policy addressing protection, alteration and provision of cultural venues and visitor attractions is to support new facilities in accessible locations, if set criteria are met. The preferred approach is also to protect existing facilities as cultural and visitor attractions (allowing flexibility amongst these types of uses) unless criteria are met, and to allow alteration and expansion of existing facilities. This approach recognises the importance of these facilities, whilst also ensuring they are appropriately located, recognising that they may have transport and amenity impacts.

The preferred approach in the draft Local Plan is therefore a combination of **option A of option set 013g and A and B of option set 013h.**

1528

Background paper 014

Grey and Digital Infrastructure

This paper addresses the provision of grey infrastructure (including roads, rail, sewers and energy) and digital infrastructure (including telecoms and broadband) to meet the community's needs and support the growth of the city.
Relevant Local Plan 2045 Objectives: • 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. • Curate a built environment that supports and enables people to be physically and mentally healthy. • The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.
Relevant SA Objective(s): 1. To achieve the city's ambition to reach net zero carbon emissions by 2040. 6. To provide accessible essential services and facilities. 8. To reduce traffic congestion and associated air pollution by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. 9. To achieve water quality targets and manage water resources.
SEA theme(s): Water, climatic factors, material assets, human health, landscape, population and air.

1. Introduction	3
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)	3
National Planning Policy Framework (NPPF)	3
Planning Practice Guidance (PPG)	4
Oxford Cambridge Growth Corridor	4
Oxfordshire Local Transport and Connectivity Plan (LTCP)	5
Local Cycling and Walking Investment Plan (LCWIP)	5
Local Area Energy Plans for Oxfordshire	5
Oxford Local Plan 2036 (Infrastructure Policies)	6
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	6
How is infrastructure funded?	7
Analysis of current infrastructure provision	8
Utilities: Water resources	8
Utilities: Wastewater treatment	8

Utilities: Energy	9
Digital Infrastructure	11
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal).....	12
5. Key Issues through the Local Plan 2045.....	12
Overall policy approach	12
Land Safeguarded for Infrastructure Policy	13
Appendix A – Regulation 18 Policy options sets	14
Policy Option set 014a (draft Policy S3): Infrastructure Delivery in New Development.....	15
Policy Options Set 014b (draft Policy I1): Digital Infrastructure to support New Development.....	17

1.Introduction

1.1 Infrastructure generally consists of facilities and services that meet the needs of the local population and help support development and growth.

1.2 Infrastructure is often broken down into broad sub-groups. These sub-groups are usually made up of following infrastructure categories:

- Physical infrastructure (such as transport, utilities infrastructure);
- Social infrastructure (such as schools, healthcare and community centres);
- Green and blue infrastructure (such as parks, waterways and cemeteries) and
- Digital infrastructure (such as high-speed internet, mobile telecoms and smart grid energy)

1.3 Infrastructure needs can arise from deficiencies in current provision; additional requirements to support new development; or as the result of increased demand due to population growth. This topic paper focuses on physical and digital infrastructure. It sets out an overview of the policy context relating to transport infrastructure provision. However, a more detailed discussion on transport infrastructure can be found in Background Paper 12 – Transport. A discussion about social infrastructure can be found in Background Paper 013 - Liveable city and a discussion on green and blue Infrastructure is covered in Background Paper 005a – Green Infrastructure.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (NPPF)

2.1 Infrastructure provision and delivery to support new development has become increasingly recognised as an important national planning priority in recent years. The most recent NPPF (December 2024), acknowledges the importance of new, upgraded, and/ or expanded infrastructure that is required to support the developmental aims and ambitions of the Labour administration.

2.2 Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk, and provision of minerals and energy; and community facilities (such as health, education and cultural infrastructure).

2.3 Paragraph 35 of the NPPF sets out that Plans should set out the contributions expected from development and that this should set out the levels and types of infrastructure required providing such policies do not undermine the viability of the plan. Both physical and digital infrastructure (both of which are relevant to this topic paper) are included.

2.4 Paragraph 77 of the NPPF sets out that the supply of large numbers of new homes should be “supported by the necessary infrastructure and facilities”. While Chapter 6 of the NPPF sets out the Government’s approach to the supporting economic growth through the planning system. The NPPF now includes digital infrastructure as one of the Government’s five named key sectors supported by the NPPF to “meet the needs of a modern economy”. It also sets out that planning policies should make provision for “new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries”. While Paragraph 86 sets out the importance of delivering infrastructure and associated improvements, where it is recognised that identified inadequacies are a potential barrier to investment.

2.5 Chapter 10 of the NPPF recognises the importance of digital infrastructure and sets out that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. The NPPF also stresses the importance of plans supporting the expansion of next generation mobile technology and sets out that full fibre connections should be prioritised to existing and new developments.

Planning Practice Guidance (PPG)

2.6 The Planning Practice Guidance section on Plan-making refers to infrastructure within several different contexts. A selection of these are set out below:

- The potential need for additional cross-boundary infrastructure;
- Understanding if there are barriers to investment (e.g., lack of housing, infrastructure, etc.);
- In working out developer contributions, a proportionate evidence base should include a plan-level viability assessment;
- Providing confidence that new homes will be supported by appropriate infrastructure in a timely manner and providing policy support for identified deficiencies.
- To be able to demonstrate that any critical infrastructure required to support the level of growth proposed in the plan is deliverable within a reasonable timeframe;
- To use the Infrastructure Funding Statement to support infrastructure delivery throughout the plan period.

Oxford Cambridge Growth Corridor

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

Oxfordshire Local Transport and Connectivity Plan (LTCP)

2.8 The [LTCP5](#) was published in July 2022 and follows on from the previous Local Transport Plan 2015-2031 (LTP4). The vision is of a net zero travel system for the county that protects the environment and makes for a better quality of life for communities that live there.

2.9 The LTCP is supported by a number of supporting strategies. The objectives of these strategies are to reduce the need to travel, reduce reliance on individual private car use and to promote alternative modes of transport such as walking, cycling and public/ shared transport as natural first choices.

2.10 There is a strong emphasis on promoting a 'decarbonised' transport network, air quality and productivity on a sustainable basis, which includes highlighting role of digital infrastructure in enhancing connectivity and reducing the need to travel.

Local Cycling and Walking Investment Plan (LCWIP)

2.11 Local Cycling and Walking Investment Plans (LCWIPs) are being prepared for several parts of Oxfordshire. The [Oxford City LCWIP](#) was adopted by Oxfordshire County Council in March 2020. The plan sets out evidence in relation to achieving a 50% increase in cycling in Oxford. The City LCWIP:

- Lays out a comprehensive cycle network to focus expenditure for best value;
- Identifies a list of infrastructure improvements for both walking and cycling based on best practice and the Cycle and Walking Design Guides;
- Summarises the evidence for supportive measures, such as Low Traffic Neighbourhoods and controlled parking zones; and
- Provides cost estimates for these schemes that can be used in future bids and in planning decisions.

Local Area Energy Plans for Oxfordshire

2.12 In February 2025 an announcement was made that all the Oxfordshire authorities including all district councils and the county council (supported by the Oxfordshire Leaders Joint Committee) are to deliver a Local Area Energy Plan (LEAP) for the county. This will help address climate change and provide recommendations for the development and improvement of energy-related policies, regulations and incentives including securing cleaner, more affordable energy.

Oxford Local Plan 2036 (Infrastructure Policies)

2.13 The Oxford Local Plan 2036 contains several policies relating to infrastructure. These policies help support new development by ensuring that appropriate infrastructure is provided in

a timely manner. For instance, Policy V8 – Utilities, requires planning applications to be supported by information that capacity issues have been explored with the appropriate utilities providers and sets out that development will not be supported without sufficient evidence regarding utilities capacity. Whereas Policy V9 – Digital Infrastructure, supports development that delivers full-fibre broadband connection speeds and appropriate electronic communications infrastructure provided that a set of criteria are met.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

3.1 Infrastructure investment usually either comes directly from new development in the form of developer contributions or direct delivery, or indirectly, through the attraction of central and local government funds associated with new development. Through Local Growth Funds 1 and 2, the [Oxfordshire Local Enterprise Partnership \(LEP\)](#) secured £118.4m to support dynamic economic growth funding numerous infrastructure projects. They were also awarded £24.16m, as part of Local Growth Fund 3, enabling the support more projects to benefit local people and business.

Infrastructure needs can change over time, for instance, as changes in demographics occur, or new technologies emerge, investment in infrastructure does not always keep up with the pace of development, especially in areas where the cumulative effects of smaller developments are felt more acutely, such as in Oxford. When this happens, a deficit is created which can impact on the existing and future population.

3.2 Figure 1 shows the development pressure arising from the planned growth set out in the Local Plan 2036. This area-based analysis divided the city into four broad sectors, each of which has planned housing growth of more than 1,000 units. Development pressure also exists adjacent to the boundary of the city with new around 4,800 new homes planned adjacent to the city's South Infrastructure Area. In addition, there are more than 1,100 homes proposed outside the East Infrastructure Area. A similar number of new homes are also planned (around 1,400) adjacent to the Oxford's North Infrastructure Area. Although these developments are outside the city there is the potential for them to put pressure on existing infrastructure facilities and services in the city.

3.3 Figure 1 also shows the locations of the city's Category 1 employment sites. This shows that there is a cluster of existing employment sites located in the south of the city, which is presently not well-served by public transport. Important infrastructure projects such as the redevelopment of Oxford Station and the re-introduction of passengers on the Cowley Branch Line will improve the connectivity and accessibility of these, and other employment sites in the south of the city across the county and the wider growth corridor.

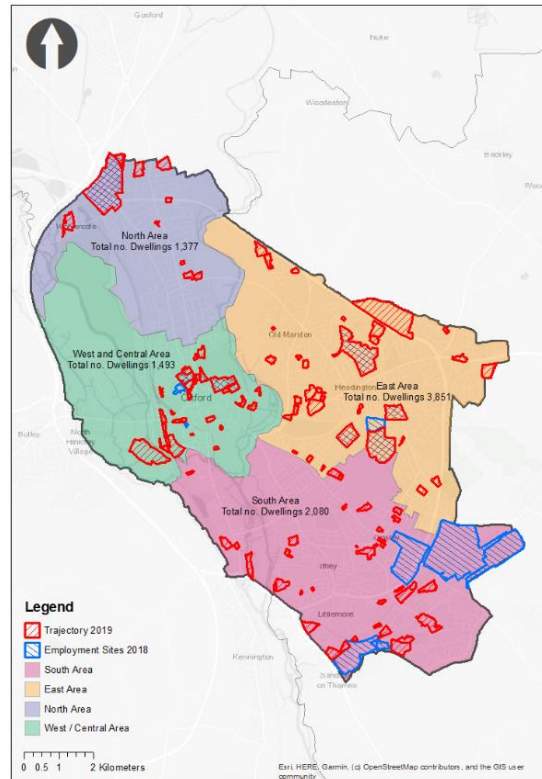


Figure 1: Area-based analysis of the Local Plan 2016-2036 requirements for ca. 11,000 new homes and 25ha of new employment land in Oxford. This map only shows Category 1 employment sites (LP2036)

How is infrastructure funded?

3.4 Currently in Oxford, Section 106 (S106) agreements and the Community Infrastructure Levy (CIL) are the main mechanisms in place for generating funds from development to be invested in infrastructure to help mitigate the impacts of development. S106 agreements can set out legal obligations for on-site infrastructure needs, are often on major sites and can include affordable housing contributions. CIL is a charge levied on the new floor space of new developments and is accumulated from developments across the city to be reinvested into infrastructure needs of the city.

3.5 The City's [Infrastructure Funding Statement \(IFS\)](#) summarises the amount of developer contributions obtained, allocated and spent in the previous financial year. CIL receipts for the 2023/24 monitoring year were just over £5.67 million and S106 contributions in 2023/24 were just over £190,000. The S106 money received was put towards a variety of contributions including affordable housing, highways management, air quality monitoring, and community facilities. Non-financial S106 contributions included public open space, affordable housing and footpath links.

3.6 [Oxfordshire County Council's Infrastructure Funding Statement \(IFS\)](#) is also available online and identifies income and expenditure for education, highways and public transport, fire service, libraries and other county responsibilities.

Analysis of current infrastructure provision

Utilities: Water resources

3.7 Thames Water has a duty to maintain the security of the water supply, and every five years they produce a Water Resources Management Plan (WRMP) which sets out how they plan to meet customer's needs while protecting the environment over the plan period. The latest version WRMP24 [published in October 2024](#) looks ahead to 2075.

Utilities: Wastewater treatment

3.8 The Oxford sewer network manages demand from over 250,000 customers sited in Oxford and the surrounding areas. The catchment is served by the Oxford Sewage Treatment Works (STW), located just outside the city boundary to the south of the city, and Littlemore Pumping Station.

3.9 The Oxford STW is one of the most important structural assets with respect to future development in Oxford. In the past, it has benefitted from some increases in capacity. However, recently further upgrades to the Oxford STW facility have been shown to be needed. These upgrades are to ensure that the Oxford STW is able to both meet current and future demand for growth in the city and the surrounding area.

3.10 Thames Water, the Environment Agency and Oxford City Council met several times in 2024 to discuss the progress of the upgrades required to improve treatment capacity at the Oxford STW. The purpose of these meetings was to provide confidence and evidence that the planned and proposed growth in the surrounding area can be realised in full (and any wastewater arising from it could be satisfactorily dealt with at the Oxford STW). Thames Water has kept Oxford City Council updated and involved in its capacity upgrade discussions. On 20 March 2025, following a rigorous process to find a solution to unlock new homes, an announcement was made that the EA, Thames Water and Oxford City Council agreed a scheme to provide the capacity needed at the Oxford STW. Thames Water has presented a clear, fully costed and funded programme of work that provides the confidence and certainty that water quality will be protected and communities in the area will have the water services they need, allowing projected growth to come forward.

3.11 The City Council has commissioned a new Water Cycle Study to accompany the preparation of the Local Plan 2045 which will analyse the current situation in the water environment, The Water Cycle Study looks at how the likely development proposed through the new Local Plan could potentially impact the water environment.

Utilities: Energy

3.12 Scottish Southern Electricity Networks (SSE) is responsible for delivering electricity distribution across southern England, including Oxford. Throughout the development of the Local

Plan 2036 the Council liaised with SSE in relation to the likely impacts of proposed development allocations in the plan on their networks; and to ensure that any upgrades to the network that may be required to serve the proposed levels of development will be provided in a timely manner. Continuing these conversations to support the production of the Local Plan 2045 are an important part of infrastructure planning especially as more details are known about the quantum and distribution of development.

3.13 Oxford has set out ambitious objectives in relation to cutting carbon emissions and moving towards being a net zero city by 2040. Renewable energy generation technology is likely to play an important role in this endeavour and there is a variety of renewable energy infrastructure schemes around the city.

3.14 The online platform '[The Peoples Power Station](#)' which was developed by the Low Carbon Hub maps a variety of renewable energy and energy efficiency projects across Oxfordshire and a snapshot of the distribution for Oxford is included in Figure 2, which shows that most installed schemes in the city involve small-scale solar photovoltaics. This reflects the constrained nature of Oxford, and the relatively high density of the existing built-up area means that there are limited opportunities for some larger-scale renewable energy projects (e.g., solar farms). However, the city's higher densities also present opportunities for certain renewable energy projects (e.g., district heating), which need numerous potential users within close proximity to one another.

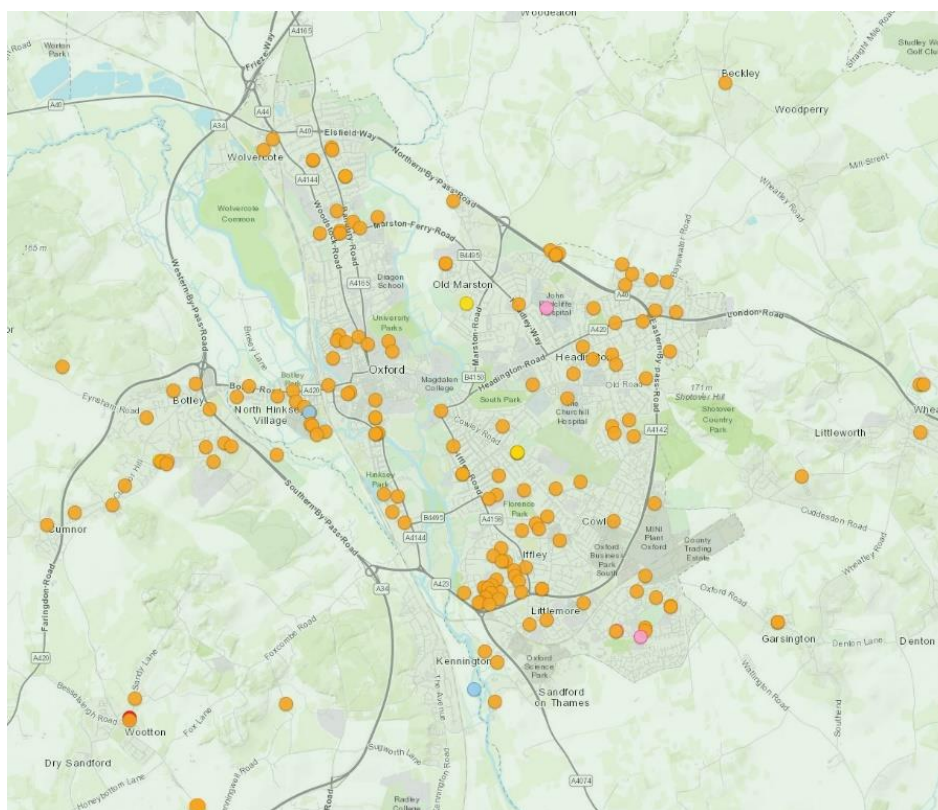


Figure 2: Renewable energy generation schemes in and around Oxford. Orange markers indicate solar photovoltaics, yellow is solar thermal, pink is combined heat and power, and blue is hydro. Source: People's Power Station (accessed 13 January 2025)

3.15 Renewable and low-carbon energy technologies are currently secured in new developments to comply with the policy requirements of the Local Plan 2036. As such they are usually negotiated through commitments secured through the development management process and are therefore generally funded and provided by developers.

3.16 As well as electricity, gas supply is often regarded as an essential utility provision in new development. The national high pressure gas transmission system is owned by National Grid, but the lower pressure local distribution network in the Oxford area is owned by Scotia Gas Network (SGN).

3.17 As part of the development of the Local Plan 2036, SGN assessed all identified sites to identify if there would be any likely issues with the gas network. The results of the network capacity assessment showed that most of the sites would be unlikely to have any issues connecting to the gas network. It will be important to ensure that any new sites identified through the Local Plan 2045 are able to be satisfactorily accommodated within the existing network.

Digital Infrastructure

3.18 Oxfordshire County Council's [Digital Infrastructure Programme](#) aims to improve digital infrastructure across the county and their work includes bespoke projects such as delivering GigaHubs with Full Fibre broadband including at more remote locations including village halls, GP surgeries, schools and other public buildings. Other important work involves the delivery of gigabit-capable broadband to around 10,000 premises in Oxfordshire and driving to deliver 5G technology in Oxfordshire as part of a wider regional project across England's Economic Heartland.

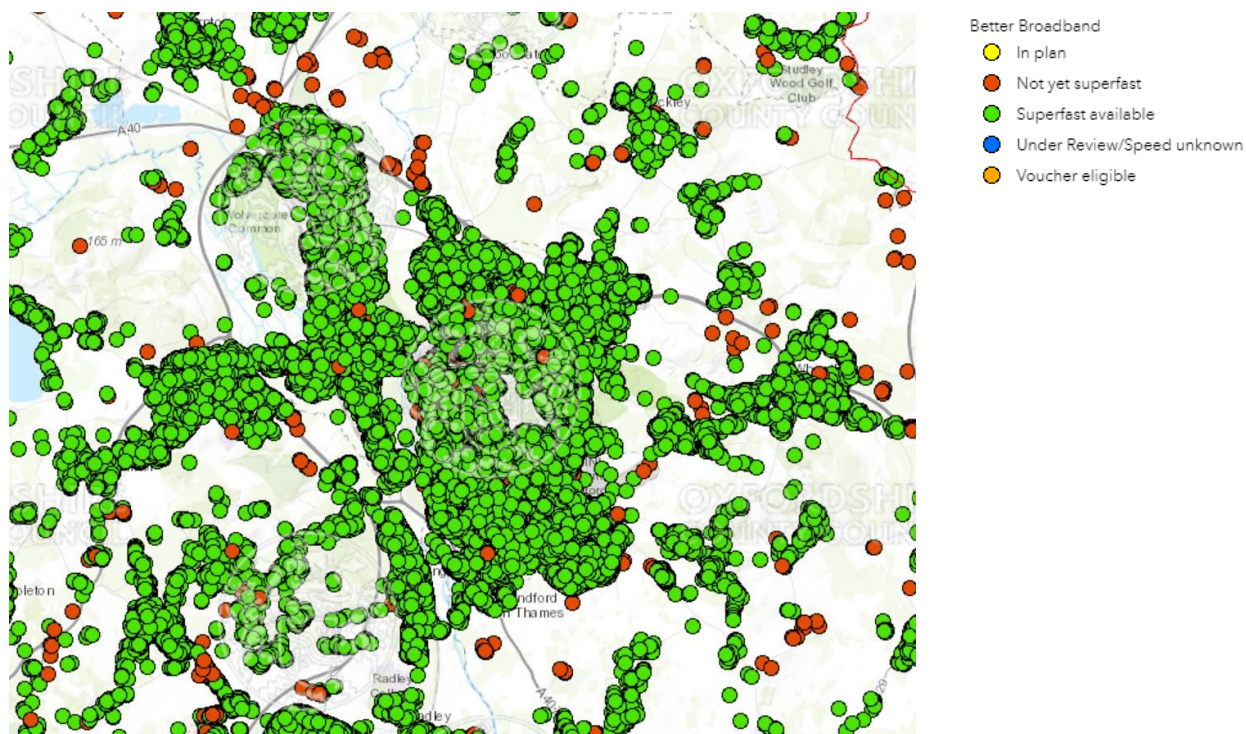


Figure 3: Map of broadband coverage in Oxford City. Source: [Digital Infrastructure Oxfordshire](#).

3.19 Good broadband connections are essential for many highly skilled jobs. Oxford is well covered by superfast broadband connections (speeds of >24Mbps). Figure 3 shows the availability of superfast connections across the city is now widespread, although there are still some areas where improvements are needed. Good broadband connections can help support a range of employment opportunities including supporting opportunities that enable flexible and hybrid working styles.

3.20 The County Council has been undertaking work in relation to the roll out of full fibre for commercial buildings, with the aim that this will also support the delivery of high-quality digital infrastructure to surrounding residential properties. Another County Council project is supported by a funding source available from central government which can only be used for the 'final 20%' harder to reach properties and ensure that they have 'superfast' connectivity. Although it is often used to support the delivery of broadband outside of urban areas the fund may apply to some areas of Oxford.

Another important aspect of digital connectivity is coverage of telecoms and mobile phone networks. Coverage varies across the city based upon which of the four main mobile network operators are being used to provide this service, with higher generations of network (up to 5G which is currently being rolled out nationally), being able to offer increased performance and download speeds.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

4.1 Infrastructure is needed to mitigate the impacts of new development and support its delivery. A new Local Plan provides an opportunity to review and update the existing infrastructure requirements identified to support the current adopted plan. Without a new plan, any infrastructure schemes needed to support the delivery of new additional development (not previously identified within the current Local Plan) may not be delivered in a timely manner.

4.2 Discussions with key stakeholders and infrastructure delivery partners is an important aspect of the plan-making process because key stakeholders can identify infrastructure and funding gaps needed to support development. Having a clear and up-to-date understanding of the likely future development in an area can assist infrastructure partners with infrastructure planning and funding programmes which often do not align with the Local Plan making process. The likely trends without a new Local Plan could mean that key critical infrastructure issues are not identified at an early stage and this could result in delays to infrastructure delivery. A new Local Plan provides an opportunity to identify and address issues with infrastructure providers and key stakeholders to ensure that infrastructure is delivered in a timely manner to support mitigate the impacts of development.

5. Key Issues through the Local Plan 2045

Overall policy approach to infrastructure provision

5.1 Infrastructure is often delivered by third party providers, whose delivery plans are not always synchronised with the development planning process. Therefore, the Local Plan provides an opportunity to update third-party providers with development projections. The inclusion of infrastructure policies provides a framework by which specific infrastructure needs for different types of development can be identified as much as possible in a transparent and predictable way. Overall this can assist with ensuring infrastructure is delivered in a timely manner to support development.

Land Safeguarded for Infrastructure Policy

5.2 The plan includes a new policy (policy I2: Land Safeguarded for Infrastructure), which did not form part of the Regulation 18 consultation document. The purpose of the policy is to show within the Local Plan 2045, certain infrastructure schemes that are covered by other consenting regimes which fall outside of the jurisdiction of Oxford City

Council's planning powers. The Policy itself covers two specific infrastructure schemes – the Oxford Flood Alleviation Scheme, and East West Rail. The County Council is the determining authority for the Oxford Flood Alleviation Scheme, while East West Rail is a Nationally Significant Infrastructure Project (NSIP). Both infrastructure schemes are at stages within their respective consenting regimes where it is appropriate to include information relating to these schemes within the city's Local Plan 2045. Each scheme is considered in turn. The land safeguarded for the East West Rail Project was the subject of a Safeguarding Direction in November 2025 which introduced specific procedural requirements for development proposals within the affected area. While the Oxford Flood Alleviation Scheme is at an advanced stage in the County Council's development management process.

5.3 Effectively, there are two policy options that were considered. Either to include a policy or not. Neither option is considered to have any significant effects on the sustainability objectives identified within the SA Framework. This is because the safeguarding of land identified within either infrastructure scheme does not significantly affect the ability of locations identified for development that have been identified in the Oxford Local Plan 2045, to come forward. Also, any assessment of whether there was a policy or not would be likely to be broadly similar. However, the inclusion of a policy would be likely to help to support a more transparent and joined-up approach between the different consenting regimes.

5.3 Policy I2: Land Safeguarded for Infrastructure is therefore a policy which provides information about strategic infrastructure schemes (i.e., that cover more than one local authority area) and provides bespoke procedural undertakings for each of the identified schemes. The City Council considers that, on balance, given that such a policy would not give rise to any likely significant effects, and would be likely to help support a more transparent approach, the City Council has therefore included such a policy within the Local Plan 2045.

Appendix A – Regulation 18 Policy options sets

- The Local Plan 2045 includes proposed policies that aim to facilitate provision of physical and digital infrastructure in support of development in Oxford. For each potential policy, options for the specific approach that could be taken for the Local Plan 2045 have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.
- Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report). A summary of this screening process is included at the end of each options set table.

Policy Option set 014a (draft Policy S3): Infrastructure Delivery in New Development

5.6 National policy requires local plans to make sufficient provision for a range of different types of infrastructure. This option set looks at two options - Option A considers introducing a policy to require development proposals make a contribution towards or deliver the infrastructure required to meet identified needs. Option B, in contrast considers the positive and negative consequences of not introducing such a policy.

Table 5.1 Policy options set 014a – Infrastructure Delivery in New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option A Include a policy that sets out how and when development proposals are expected to contribute to, or deliver the infrastructure required to meet identified needs. Make specific reference in the policy to the Infrastructure Delivery Plan (IDP) and set out a selection of specific infrastructure projects. Support the use of on- and off-site contributions and identify appropriate delivery mechanisms (e.g., S106, S278, CIL) to support the timely delivery of infrastructure.	Provides clear advice about how and when infrastructure delivery is needed to mitigate the impacts of development. The IDP forms a key part of the evidence base which helps to demonstrate that there is a funding gap and that contributions from development can be sought. Setting out the specific infrastructure projects in the policy can help the plan achieve its vision.	No specific reference about how best to delivery infrastructure projects that are themselves resilient to future climate change impacts. Policy only explicitly mentions rail and bus infrastructure requirements.
Option B Do not include a policy that supports infrastructure delivery in new development.	Limited or uncertain positive consequences of this approach	Likely to cause uncertainty about future infrastructure requirements and associated costs, all of which need to be negotiated through the development management process. This could lead to delays in the infrastructure provision and result in a more resource-intensive development management process, which could

		increase the time taken to determine planning applications. Would not identify and may not result in the delivery of key infrastructure projects required to support the plan's vision.
Initial sustainability appraisal screening of options sets		
Is there only one option or are there various options we could take? Option A High-level screening conclusion? Significant effects unlikely Screened in for detailed appraisal? No Rationale: Option A is unlikely to have significant effects on the SA objectives. This is in part because the policy provides a mechanism to support the timely delivery of infrastructure, which itself mitigates the identified impact the level of growth proposed in the plan. When considered against the SA objectives, option is likely to have neutral or minor positive effects on SA Objective 6 Services and Facilities, and may support increased accessibility and connectivity through delivering rail, bus and active travel measures which are likely to have an overall neutral or minor positive effect on SA Objective 8 Transport and air quality as a shift away from non-car modes is more likely with the delivery of improved rail, bus and active travel infrastructure.		

Infrastructure Delivery in New Development – draft Policy S3

The preferred approach for the Local Plan 2045 draft policy to take forward is **option A**. This is because the local plan needs to enable infrastructure to be delivered in order to mitigate the impact of the development it proposes. The draft policy provides the mechanism to seek contributions for, or deliver the identified infrastructure needed to support the growth proposed in the plan.

Policy Options Set 014b (draft Policy I1): Digital Infrastructure to support New Development

Table 5.2: Policy options set 014b: Digital Infrastructure to support New Development

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require the provision of high-speed digital infrastructure (integration of gigabit ready physical infrastructure, future proofed construction to allow for integration if not immediately available) in all development, including residential, employment and conversions.	Ensures that development schemes connectivity is delivered in a consistent and measurable manner. Compliance with NPPF (para 119) and building regs.	There may not be any need for specific policy as building regs and NPPF already contain provisions for digital infrastructure and connectivity.
Option b Have no specific policy on digital infrastructure, rely on national planning policy.	NPPF already has permissive approach to communications infrastructure (paras 119 – 123), and local authorities are directed to make decisions on planning grounds only, which can already be covered by other relevant policies in plan. There is already growing provision of high quality infrastructure.	NPPF only addresses the provision of infrastructure by service providers, with no specific requirements for levels of connectivity and access at individual user level. NPPF also requires a specific policy so not having one will be in contravention.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B) High-level screening conclusion? the options are similar to each other from a sustainability perspective Screened in for detailed appraisal? No Rationale: The options most directly influence criterion 6. Services and Facilities and may also have relevance to criteria 5. Inequalities, as uneven access to high quality digital services may be an indicator of spatial and socioeconomic inequality. There may also be relevance to criteria 1 and 8 as enhanced connectivity could potentially reduce the need for some journeys. The impacts are not

expected to be more than minimal in the context of the other policies in the plan. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal.

Digital Infrastructure for new development – draft Policy I1

The preferred approach for the Local Plan 2045 draft policy is to take forward **option A**. This approach ensures compliance with the NPPF, which is supportive of infrastructure provision and requires a specific policy. It also allows the local plan to make specific requirements and set standards at individual scheme level with regards the type of development, level of connectivity, access and type. It will be possible to ensure delivery of infrastructure at a consistent level that can be effectively monitored, and which is response to the local/regional needs of the city's employers and residents.

New Policy Options Set 014c added since Regulation 18 (draft Policy I2): Safeguarding land for infrastructure

Table 5.2: Policy options set 014c: Safeguarding land for infrastructure

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include a policy setting out land safeguarded for provision of infrastructure (specifically the Oxford Flood Alleviation Scheme and East West Rail)	Ensures clarity and flags upfront where provisions from other regimes will require involving other bodies. Helps to be clear about what land is needed for successful delivery of these specific infrastructure schemes. The inclusion of a policy would be likely to help to support a more transparent and joined-up approach between the different consenting regimes.	There may not be any need for specific policy as land is already safeguarded outside the Planning regime.
Option b	The land is already safeguarded so there is no need to bring a policy into the Local	Not including the policy or adding the safeguarded land to the policies map

Have no specific policy safeguarding land for infrastructure, rely on national planning policy and other regimes.	Plan to ensure that the land is protected from other development that would prevent the infrastructure being developed.	misses the opportunity to flag this issue at an early stage so that landowners can design their proposals accordingly.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B) High-level screening conclusion? the options are similar to each other from a sustainability perspective Screened in for detailed appraisal? No Rationale: The options most directly influence criterion 6. Services and Facilities. Overall, the likely sustainability impacts between the options are not significant and not complex enough to warrant a detailed appraisal. The safeguarding of land identified within either infrastructure scheme does not significantly affect the ability of locations identified for development that have been identified in the Oxford Local Plan 2045, to come forward.

Digital Infrastructure for new development – draft Policy I1

The preferred approach for the Local Plan 2045 draft policy is to take forward **option A**. This approach ensures compliance with the NPPF, which is supportive of infrastructure provision and adds clarity to the Plan. It helps support a more transparent approach, and ensures the need to respond to the safeguarding requirements is flagged at an early stage.

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