

**Northern Gateway Area Action Plan Sustainability Appraisal
and Habitats Regulations Assessment Adoption Statement**

July 2015



TABLE OF CONTENTS

	Page
1. Introduction	3
2. How environmental / sustainability considerations have been integrated into the Northern Gateway Area Action Plan	6
3. How the sustainability appraisal report has been taken into account	11
4. How the opinion of statutory bodies and the public have been taken into account	17
5. The reasons for choosing the plan as adopted, in the light of other reasonable alternatives dealt with	20
6. Measures to be taken to monitor the significant sustainability effects of the implementation of the Northern Gateway Area Action Plan	31
7. Habitats Regulations Assessment	39

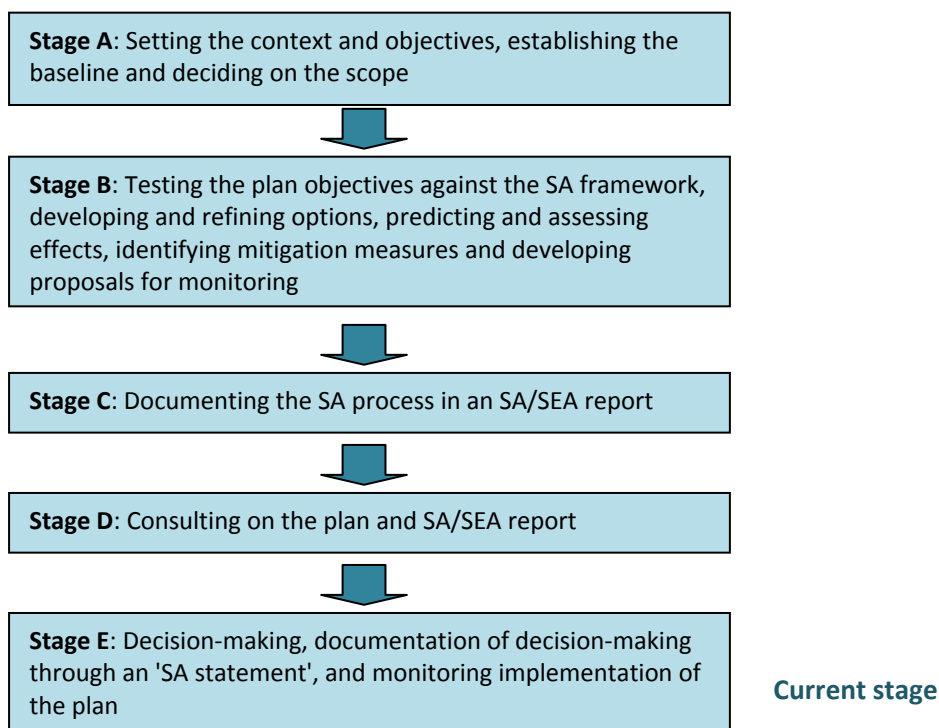
1. INTRODUCTION

1.1 After a two year process, Oxford City Council’s Northern Gateway Area Action Plan (‘the Plan’) received a positive Inspector’s Report on 15th June 2015 which stated that the Plan provides an appropriate basis for the planning of the area. The AAP went to Full Council on 20th July 2015 with a recommendation for adoption. As part of the development of the Plan, its effects were assessed through a Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA). This report explains how the SA and HRA processes affected the development of the Plan: it is the 'SA statement' for the Northern Gateway Area Action Plan.

1.2 SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. It is required by the Planning and Compulsory Purchase Act 2004, and also incorporates the strategic environmental assessment (SEA) requirements of the European 'Strategic Environmental Assessment' Directive, transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004. SA/SEA has five main stages, as shown in Figure 1.1. This report fulfils one of the requirements of Stage E, namely documentation of the decision-making process.

1.3 HRA assesses the impacts on the Natura 2000 network of internationally important nature conservation sites. It is required by the European 'Habitats Directive', transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010 (and previous similar legislation). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

Figure 1.1: The sustainability appraisal / strategic environmental assessment process



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

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

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

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

The HRA process for the Plan is summarised at Section 7.

1.6 Much of the information in this report is a summary of more detailed reports which were prepared as Core Documents for the Examination in Public of the Northern Gateway Area Action Plan, and which are available in full from <http://www.oxford.gov.uk/northerngateway>. Throughout this SA/SEA statement, 'CDx.x' refers to these Core Documents.

2. HOW ENVIRONMENTAL/SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE NORTHERN GATEWAY AREA ACTION PLAN

2.1 The Northern Gateway Area Action Plan has gone through a series of pre-production and production stages between September 2013 and March 2015, starting with evidence gathering, then options, proposed submission, and examination. The SA was carried out in-house, with periodic quality reviews by Levett-Therivel Sustainability Consultants. This has allowed the findings of the SA to be fully integrated into the preparation of the Plan. An addendum to the LDF Scoping Report for the Northern Gateway was published in November 2013. The links between the Northern Gateway Area Action Plan development and the SA/ SEA are shown in Table 2.1.

Table 2.1: Links between Northern Gateway Area Action Plan development and SA/SEA

Date	Plan-making stage	SA/SEA stage	Comments
	SA/ SEA Evidence gathering	Local Development Framework Scoping Report (incorporating Task A1)	The LDF Scoping Report was produced in January 2006 and updated in April 2011.
September - November 2013	Evidence gathering	Preparation of <i>Scoping Report for the Local Development Framework - Addendum for the Northern Gateway Area Action Plan</i> (incorporating Tasks A2-A5)	
18.11.13 – 13.12.13	SA/ SEA Evidence gathering	Consultation on <i>Scoping Report for the Local Development Framework - Addendum for the Northern Gateway Area Action Plan</i>	Updated following comments received Consultation responses summarised in CD3.4
December 2013 - March 2014	Preparation of <i>Northern Gateway Area Action Plan Options Document</i>	Preparation of <i>SA report for the Northern Gateway AAP Options Document</i> (incorporating Tasks B1-B3)	
14.2.14 – 28.3.14	Consultation on <i>Northern Gateway Area Action Plan Options Document</i>	Consultation on <i>Preferred Options SA Report</i>	Consultation responses summarised in CD3.4
April – July 2014	Preparation of <i>Northern Gateway Area Action Plan Proposed Submission Document</i>	Preparation of <i>SA Report for the Northern Gateway AAP Proposed Submission Document</i> (incorporating Tasks B3-5 and C)	SA report addressed significant changes since the Options stage
21.7.14 – 15.9.14	Consultation on <i>Northern Gateway Area Action Plan Proposed Submission document</i>	Consultation on <i>SA Report for the Northern Gateway AAP Proposed Submission Document</i> (incorporating Task D)	Responses summarised in CD3.4
24.10.14	Submitted Northern Gateway Area Action Plan	<i>SA Reports</i> submitted alongside Northern Gateway Area Action Plan	SAs found at CD1.5, 1.12 and 1.13
10.3.15 – 19.3.15	Examination hearings of Northern Gateway Area Action Plan		

Date	Plan-making stage	SA/SEA stage	Comments
15.6.15	Final Inspector's Report received		
20.7.15	Northern Gateway Area Action Plan taken to Full Council for adoption	<i>Sustainability Appraisal and Habitats Regulations Assessment Adoption Statement</i> endorsed as documents associated with the Northern Gateway Area Action Plan (incorporating task E1)	

2.2 An SA/SEA framework was used to structure each of the assessment stages. The framework covers all of the environmental topics listed in the SEA Directive, namely 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. The SA Objectives used are shown in Table 2.2.

Table 2.2: SA/SEA Framework for the Northern Gateway Area Action Plan

SEA objective	SEA Directive topic
1. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	human health water
2. Encourage urban renaissance by improving efficiency in land use, design and layout and to create and sustain vibrant communities	Population human health material assets soil interrelationships
3. Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home	Population human health
4. Improve the health and well-being of the population and reduce inequalities in health	human health
5. Reduce poverty and social exclusion and reduce crime and fear of crime	population human health material assets interrelationships
6. Raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work	
7. Provide accessible essential services and facilities	
8. Provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all	
9. Conserve and enhance Oxford's biodiversity	biodiversity flora fauna
10. Protect and enhance the historic environment and heritage assets	landscape cultural heritage material assets
11. Reduce traffic congestion and associated air pollution by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car or lorry	air climatic factors
12. Maintain and improve soil and water quality and manage water resources	water soil
13. Increase energy and resource efficiency (including minimising waste) and renewable energy, with the aim of mitigating and adapting to climate change	water soil climatic factors material assets interrelationships

14. Achieve sustainable economic growth (includes the development of a dynamic, diverse and knowledge-based economy	
15. Stimulate economic revival in deprived areas	
16. Promote sustainable tourism and the development of a cultural offer that all sections of the community can enjoy	

3. HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

3.1 The SA process helped to identify options for the Northern Gateway Area Action Plan: this is discussed at Section 5. This chapter considers influences that the SA had on the development of the Northern Gateway Area Action Plan.

3.2 Because of the tight integration of plan-making and SA discussed at Section 2, it has not always been possible to identify those changes made specifically as a result of the SA: many minor changes / comments suggested by the SA have been incorporated directly into the Northern Gateway Area Action Plan without being formally documented.

SA Report for the Options Document of February 2014 (CD1.13)

3.3 The SA Report of February 2014 assessed the impact of a range of options for policies. The SA findings of the sustainability appraisal were then taken into account in the development of the policies in the Proposed Submission Document. Table 3.1 sets out some examples of how the policies have been shaped by the SA.

Table 3.1: Ways in which the July 2014 SA Report shaped the Proposed Submission Document

SA Objective	How were the SA considerations integrated into the next stage of the AAP?
SA Objective	SA considerations integrated into the next stage of the AAP
1: Flooding	The SA identified potential surface water flood risk concerns due to the increase in built surface area. This has been taken into account in the AAP policies and through measures in the Design Code relating to SUDs and other drainage solutions.
2: Urban renaissance and land efficiency	The SA identified that the 'gateway' concept was likely to deliver sustainability benefits so this has been taken forward as a theme running through the AAP. A Design Code was commissioned to support good design and help achieve efficient use of land.
3: Meeting housing needs	The SA identified that provision of affordable housing at the current policy level (50% as set out in the Affordable Housing SPD) would have most sustainability benefits. Therefore the AAP will be delivered in this context and does not seek to set an alternative rate of affordable housing.
4: Improve health and well-being	The conclusions from the SA about health are reflected several policies in the AAP including the provision of cycling and walking opportunities, higher than standard provision of green open space, and transport measures to address levels of air pollution in the AQMA.
5: Reduce poverty, social exclusion, crime and fear of crime	The AAP policies include several measures which should help to address the issues raised in the SA, including promoting non-car modes to support access to jobs, and provision of affordable housing.
6: Educational achievement and acquiring work skills	The AAP policies do not include provision of any schools on site, but this is because the evidence base indicates it is appropriate to accommodate through capacity in nearby schools. The policies do support growth of the universities and other higher educational institutes. The policies also support good access to the site from other parts of the city so that if there are training/apprenticeships available then they are accessible to more people.
7: Accessible services and facilities	The SA identified mainly positive impacts and those measures are reflected in the AAP policies, including leisure facilities provision via the hotel and community use of school facilities, and a higher level of open space provision, and an extension to the park and ride capacity.
8: Green infrastructure, leisure and recreation	The AAP policies seek to increase the positive benefits through provision of higher open space requirements, and also to closely link it to the residential areas to ensure that it is usable and accessible space.

SA Objective	How were the SA considerations integrated into the next stage of the AAP?
9: Biodiversity	The AAP recognises the concerns raised in the SA of the Options, and sets out a clear statement in a policy dedicated to protection of the SAC. An HRA has also been carried out to inform the policy and to address SA concerns.
10: Historic environment	The AAP policies and the Design code (Appendix to the AAP) pick up the concerns about the Wolvercote Conservation Area and the potential negative impacts on heritage.
11: Traffic congestion and sustainable travel	Further transport modelling work has been carried out since the SA of the Options. This has enabled the policy to identify a specific package of transport measures to clarify how the sustainability issues related to transport will be addressed and mitigated.
12: Soil and water quality, resources and surface runoff	The AAP policies, and the Design Code Appendix, seek to address drainage issues, for example by incorporating SUDs into the new built form.
13: Energy and resource efficiency, and adaptation to climate change	The policy takes forward the preferred option of an on-site renewable energy scheme, to help mitigate climate change impacts. The policies also support walking/cycling/public transport options to encourage reduced emissions from cars related to the development.
14: Achieve sustainable economic growth.	The SA identified mainly positive impacts on the objective, and the higher employment levels have accordingly been carried forward into the policies. Indeed the floorspace previously identified for the emergency services centre has also now been added to the employment allocation to increase it further.
15: Stimulate economic revival in deprived areas	The SA previously identified that it may be challenging to have direct impact on some of the priority regeneration areas because they are not within or adjoining the Northern Gateway area. These factors cannot be changed because the locations are fixed, however the policies do seek to make Northern Gateway more accessible so this should help support ripple-out to other parts of the City.
16: Sustainable tourism and culture	The SA previously identified that the benefits will be limited to some extent because most tourist activity is focussed on the historic centre of the City. This factor cannot be changed but the policies do seek to improve visitor experience by allocating the hotel onsite, and by improving accessibility from the north and west, through urban design and travel experience improvements.

SA Report for the Proposed Submission Document of July 2014 (CD1.5)

3.4 The SA Report of July 2014 recommended mitigation and enhancement measures for the draft policies of the Proposed Submission Document. Table 3.2 shows that most of the mitigation measures were been implemented.

Table 3.2: Mitigation measures proposed in July 2014 SA Report for Proposed Submission Document

Policy	Proposed mitigation measure (task B5)	Were the mitigation measures implemented?
MP1 model policy	None identified	N/A
NG1 Green Belt	None identified	N/A
NG2 Mix of uses	Could include a visitor centre to encourage and inspire local schools into the knowledge-based industries, particularly for those from more deprived areas of the City.	Text included to read: "The focus of the site is on the knowledge economy which could be seen as being quite exclusive, so an element of outreach to demystify the sector and encourage in particular local young people, to consider a future in these fields could be beneficial for the sector and the city as a whole."
	Policy should specify local scale retail only because larger scale (eg 4-	Policy states: "In line with the Core Strategy allocation the City Council considers it is important to limit the

Policy	Proposed mitigation measure (task B5)	Were the mitigation measures implemented?
	5,000sqm) is likely to attract shoppers generating even more car traffic to this congested area and around the ring road, which would have negative sustainability impacts eg on transport objectives.	retail uses to a local scale rather than to create more destination shopping facilities which would attract more visits to the area. This approach is in line with the NPPF which seeks to ensure the vitality of existing centres. Limiting the retail uses to a local scale on the Northern Gateway site ensures that the development does not compromise the vitality and viability of the district centre of Summertown.”
	Would be helpful if the supporting text explained that the leisure and other facilities associated with the hotel, as well as open spaces for recreation, will be available for public use.	Text added to read: “The development of a hotel with leisure facilities provides the opportunity for associated leisure facilities that would be open to non-hotel-residents.”
NG3 employment	Could increase benefits by requirement for use of local labour in construction	Text added to Delivery section to read: “Where there are chances to link local people and businesses to the economic opportunities arising from the development or associated supply-chains, the City Council will be encouraging their uptake.”
	Policy could encourage a range of unit sizes so that it can accommodate firms of all sizes, from new starts through to established local firms, to major inward investors. This will create a community of businesses and enable firms to move to larger premises within the development as they grow, without undue disruption to their labour force or supply chains.	Text included to read: “A range of unit sizes on the site would help to encourage firms of all sizes and offer the opportunity for business growth within the development. This would foster the business community within the site, enabling firms to expand without having to relocate with the disruption that inevitably causes to their labour force and supply chains.”
NG4 sustainable travel	Good connectivity for pedestrians and cyclists to adjoining areas will assist with integration of the new community, and to ensure access to services and facilities	Added text to policy on Sustainable travel: “Provision of high quality pedestrian and cycle links from the site to nearby residential areas and facilities (including local schools) and connecting with existing Rights of Way”
	Ensure connections to the new Oxford Parkway train station to offer a realistic alternative to driving to the site for those travelling longer distances.	Text added to 2 nd bullet point of policy on Sustainable travel: “Provision of a high quality cycle link to the new Oxford Parkway Railway Station (connecting with the Banbury Road cycle path, through Five Mile Drive)” Beyond the AAP boundary the new railway station at Oxford Parkway offers a significant opportunity for sustainable longer distance travel, particularly into London. As part of the works to the railway line a new footbridge will be provided offering a safe crossing of the line and reconnection of the existing public right of way to the new station. The City Council will work with partners to facilitate further improvements to this public right of way. An additional cycle link will be provided between the Northern Gateway and the new railway station connecting with the Banbury Road cycle path (National Cycle Route 51) through Five Mile Drive.
NG5 highway access	Design Code should encourage use of permeable surfaces/materials in construction of new roads or paths	New text added: “SUDS techniques include a wide range of potential measures including permeable surfaces (e.g. car parking)...SUDS features should also

Policy	Proposed mitigation measure (task B5)	Were the mitigation measures implemented?
		be designed to provide visual and recreational amenity as much as drainage infrastructure.”
NG6 car parking	None identified.	N/A
NG7 design and amenity	Use design and layout to encourage recreation and leisure at <i>appropriate</i> adjoining areas and not unduly increase visitor pressure on the adjoining SAC. Eg improve pedestrian and cycle connections to the canal towpath instead, or to Cutteslowe Park (classified as a large/city park and of high quality).	New text added: “Improvements to the pedestrian and cycle network (set out at Policy NG4) will also offer opportunities for residents and employees to access more strategic areas of green infrastructure such as the large City Park at Cutteslowe and the Neighbourhood Park at Five Mile Drive Recreation Ground.”
	Inclusion of multi-purpose SUDs (eg soft landscaped open space) could help to address not only surface water issues but other sustainability objectives such as amenity too.	New text added: “SUDS features should also be designed to provide visual and recreational amenity as much as drainage infrastructure.”
	Resource efficiency and climate change mitigation benefits could be helped if policy encourages exemplar building sustainability standards.	Existing policies (Core Strategy, NRIA SPD, and Sites and Housing Plan) already encourage energy efficient buildings across the City, and onsite renewables, so would apply to Northern Gateway too. Text included: “Traditionally the eco-standards that a development will be built to would be secured at the outline planning application stage however at the Northern Gateway buildings will be required to be constructed to the standards in place at the time of the subsequent reserved matters applications and thereby factoring in any tightening of requirements over time.”
	Specifying ‘green’ open space could help to secure biodiversity benefits and water management, in addition to other benefits of open space	Policy and text amended to specify Green open space
	Climate change mitigation and adaptation measures should be incorporated more explicitly into the Design Code. It includes measures such as material use, and orientation, which relate to climate change but does not clearly make the link for the reader.	Design Code refers to ‘environmental responsibility’ which would encompass climate change. In addition existing policies in the development plan set out the Council’s clear intentions about mitigating climate change.
NG8 Oxford Meadows SAC	Policy should seek active habitat creation as part of green infrastructure, to support and join up wildlife corridors.	Already in CS12 but new text added: “The City Council will seek active habitat creation on the site, linked to the provision of green infrastructure. In particular opportunities will be taken to create links between natural habitats and join up wildlife corridors.”
	Amend section heading to ‘Biodiversity and the Oxford Meadows SAC’ to clarify that the AAP is seeking to protect biodiversity more widely than just that in the SAC.	Section heading amended, and text expanded to refer to wider biodiversity features, such as retention of existing hedges.
NG9 energy and resources	Design principles should include sustainable construction methods to encourage sustainable use of materials, and adaptation measures on buildings such as high insulation	Already elsewhere in the development plan in CS9 and HP11, and additional text added “The City Council places great emphasis on the use of energy and resources within buildings and requires information on the efficiency, renewable energy and use of materials

Policy	Proposed mitigation measure (task B5)	Were the mitigation measures implemented?
	standards to reduce energy consumption.	as part of planning applications “.
NG10 phasing and implementation	Including a requirement for local labour/training opportunities during construction phases would have a more positive impact on the objectives	Text added to read: ““Where there are chances to link local people and businesses to the economic opportunities arising from the development or associated supply-chains, the City Council will encourage their uptake.”
	Policy should encourage infrastructure and enabling works to go in first, ahead of the main development or occupation, to minimise the impact of construction traffic on this already-congested part of the City, and to ensure that sustainable transport alternatives are available from the outset for occupiers to encourage sustainable habits from the start.	New text added: “Delivery of the required infrastructure in the area, and the mitigation measures associated with the Northern Gateway development will be key to a successful outcome. The Core Strategy recognises that “...mitigation measures must be implemented in accordance with the agreed phasing, with full implementation prior to the occupation of the final development phase”. ¹ The delivery of infrastructure at the earliest possible opportunity will be pursued, and advanced delivery of mitigation measures will be prioritised.” And “Delivery of measures to encourage sustainable choices such as pedestrian and cycle improvements, an energy centre and on-site open space provision, will be prioritised to ensure that new residents and occupiers are able to exercise those choices from the earliest possible opportunity.”
NG11 delivery of infrastructure	None identified	N/A
Design code (Appendix)	To have permeable surfaces on all car parking areas to address flood risk	In US03 (page 29) of Design Code AAP Design Principles
	The design coding should encourage permeability and greater accessibility to support integration with adjoining areas and support vibrant communities.	Include permeability, legibility and connected streets and these are developed further in the Design Code
	Urban design should also encourage integration with adjoining areas and should not be inward-looking.	AAP Design Principles include permeability, legibility, connected streets, public and private realm and active frontages. These are developed further within the Design Code

3.5 The SA Report of July 2014 also assessed those new or amended policies in the Proposed Submission Document (those that had not been assessed at the previous stage). The assessment predicted the effects of the new policies and recommended mitigation where appropriate. Table 3.2 identifies those policies where additional mitigation measures were proposed.

¹ Oxford Core Strategy 2026 (2011) Policy CS6
<http://www.oxford.gov.uk/Library/Documents/Core%20Strategy/Oxford%20Core%20Strategy%202026.pdf> p.50

Table 3.3: Assessment of amended policies in the Proposed Submission Document

New or amended policy	Findings of the SA Update Report	SA reflected in final policy?
NG10: Phasing and Implementation	<p>The SA found that: “this new policy effectively takes the section of the consultation Document about ‘Implementation and Delivery’, clarifies how it would be applied, and ‘upgrades’ it into a policy. It adds detail to the implementation and delivery of the AAP but does not substantially change the overall strategy.</p> <p>This new policy establishes the requirement for the phasing of the construction of the site to be fully considered, and also the environmental impacts of the construction phase. This can help to have environmental as well as economic benefits.”</p>	Yes
NG11: Delivery of Infrastructure	<p>The SA found that: “this new policy effectively takes the commentary in the supporting text for the options on transport, clarifies how I would be applied, and ‘upgrades’ it into a policy. It adds detail to the implementation and delivery of the AAP but does not substantially change the overall strategy.</p> <p>“This new policy establishes the requirement for infrastructure to be provided and in a timely manner. Identifying the potential funding streams for infrastructure helps to demonstrate the policy is deliverable. Overall this should help to deliver a sustainable development with appropriate infrastructure alongside the new land uses.”</p>	Yes

Inspectors' Report

3.6 The SA reports were part of the evidence presented by Oxford City Council at the Examination stage. Planning Inspector Christine Newmarch reviewed the reports and concluded that in terms of the legal requirements (including the SA/SEA regulations): *“I conclude that the Plan meets them all..(a) SA has been carried out and is adequate.”* (Paragraph 139, Report on the Examination into Northern Gateway Area Action Local Plan, 15 June 2015).

4. HOW THE OPINION OF STATUTORY BODIES AND THE PUBLIC HAVE BEEN TAKEN INTO ACCOUNT

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

SA Report for the Options Document of February 2014

4.2 The SA Report of February 2014 was published alongside the Northern Gateway Area Action Plan Options Document for consultation. The following organisations were consulted regarding the scoping report:

- Statutory Consultees - Environment Agency; English Heritage; Natural England
- Other bodies considered appropriate to consult at this stage – Highways Agency; Oxfordshire County Council; Cherwell District Council; South Oxfordshire District Council; West Oxfordshire District Council; Vale of White Horse District Council

4.3 The above listed statutory and appropriate bodies were contacted and the SA was drawn to the attention of all those consulted as part of the Options consultation. Whilst most of the comments received at the Options stage were in relation to the Options themselves rather than the SA per se, some of the comments related to issues that the SA seeks to address so they were also reviewed through the SA process. The comments about sustainability issues were reviewed and a judgement made on whether the issues suggested were significant enough to warrant alterations to the SA framework or to the earlier stages of the appraisal. Two responses to the consultation made direct reference to the Sustainability Appraisal. These were made by Cherwell District Council and the Northern Gateway Consortium (see Appendix A of the final SA Report).

SA Report for the Proposed Submission Document of July 2014

4.7 The SA Report of July 2014 was published alongside the Northern Gateway Area Action Plan Proposed Submission Document for consultation. Again the above listed statutory and appropriate bodies were contacted and the SA was drawn to the attention of all those consulted as part of the Proposed Submission consultation.

4.8 Ten respondents made sixteen representations that related to the Sustainability Appraisal. These comments included:

- concern from respondents that too much weight had been given to economic factors over social and environmental considerations;
- concern that insufficient evidence had been provided to assess landscape, heritage and visual impacts of the development;
- that the likely positive effects on the environment by not developing the site have been overlooked;
- that the SA was not robust or reliable enough to consider the full impact of the environmental consequences in terms of traffic and air quality

4.9 The SA assessments and conclusions were reviewed in light of these comments, and on balance none of these objections would have fundamentally altered the assessment made in the SA, nor the way that the SA has informed any of the policies in the AAP.

5. THE REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES DEALT WITH

5.1 Different alternatives (or options) were considered at different stages of production of the Northern Gateway Area Action Plan, and were assessed and compared as part of the SA process. The Consultation Statement (CD3.4) sets out how issues raised at earlier stages of production were addressed and carried forward into the Submission AAP. The Sustainability Appraisal Report of February 2014 describes what options were rejected early in the SA process and not subject to full appraisal, what other options that were subject to full appraisal, and the reasons for choosing the 'options' of the SA.

5.2 Options that were *not* considered included options contrary to national guidance, and policies in the Core Strategy were not duplicated. Table 5.1 shows for each policy the options that were presented in the Options Document; the findings of the SA; and the final policy. The blue highlighting indicates which options were finally chosen in the Plan. In the final column, it summarises the SA's comparison of the chosen options. The SA played an important role in the evaluation and decision-making around the selection and evaluation, and assessment of options.

5.3 The Options Document was the first formal stage in the production of the Northern Gateway Area Action Plan, setting out a range of options for consultation. These options were based on technical studies, collaboration with the local community and other stakeholders, and on the responses to the informal consultation in late 2013.

5.4 The Proposed Submission Document took the process onto the next step, reviewing the responses to the Options Document and any new background evidence to develop proposed wording for the policies.

Table 5.1: Options considered in the SA, and information about the choice of preferred option

Topic	Options presented at Preferred Options Document	Summary of findings from options comparison in the SA Report	Final policy of Northern Gateway AAP
Type of employment	<p>Preferred Option: Ensure the employment development directly relates to the knowledge economy of Oxford (science and technology research, bio-technology and spin-off companies from the universities and hospitals)</p> <p>Alternative Option: Ensure a set proportion (for example 85%) of the development directly relates to the knowledge economy of Oxford</p>	<p>The options follow from Core Strategy Policy CS6, the thrust of which is that employment at Northern Gateway must be strongly linked to key sectors – knowledge-based industries, often relating to the universities and hospitals, or built on Oxford’s knowledge-based clusters, however there is flexibility for B class uses that provide an essential service for Oxford. The Preferred Option therefore envisages limiting all employment to activities directly related to Oxford’s knowledge economy. The alternative option allows greater flexibility for the site to provide other types of B1 employment (i.e. those providing an essential service to Oxford).</p>	<p>NG3: Employment</p>
Primary mix	<p>Preferred Option: Maintain employment focus for the site whilst achieving good levels of housing provision</p> <p>Alternative Option 1: Reduce focus on employment uses and increase the levels of housing provision</p> <p>Alternative Option 2: Reduce provision of housing and maximise development of employment uses</p>	<p>The Preferred Option most closely mirrors Core Strategy Policy CS6. Alternative Option 1 recognises evidence of acute housing need in Oxford: this is presented as an alternative option because of the potential unsuitability of some parts of the site for housing, and because it would reduce further the limited supply of employment land in Oxford. Alternative option 2 reflects that an employment growth strategy seeks to ensure that Oxford makes the fullest possible use of its strengths as a favoured location to expand the knowledge-based economy.</p>	<p>NG2: Mix of uses</p>

Scale of employment uses	<p>Preferred Option: Place no upper limit on the quantum of employment development but leave it to design constraints to determine the appropriate level</p> <p>Alternative Option 1 (Baseline scenario): Provide up to 80,000m² of employment development (based on that indicated in Core Strategy)</p> <p>Alternative Option 2: Provide up to 55,000m² of employment development (based on policy allocation up to 2026 in the Core Strategy without the indicated development beyond that)</p> <p>Alternative Option 3: Provide up to 90,000m² of employment development (based on Core Strategy indication and additional 10,000m² as alternative to emergency services centre)</p>	All options reflect the need to build on Oxford's economic strengths, in line with Core Strategy Policy CS6. The Preferred Option goes beyond the Core Strategy allocation, but is consistent with objectives to achieve sustainable economic growth in Oxford, and would provide maximum flexibility to achieve this. Alternative Option 1 reflects most closely Core Strategy Policy CS6, which sets a target for up to 55,000m ² of employment floorspace to be delivered by 2026, and up to a further 25,000m ² beyond the Core Strategy period. Alternative Option 3 is a further alternative consistent with Policy CS6, which assumes the potential emergency services centre will not come forward. Alternative Option 2 tests a level of employment development well below the total Core Strategy allocation of 80,000m ² , which given site constraints is a realistic alternative.	NG2: Mix of uses
Residential uses	<p>Preferred Option: Provide a mid-sized development of homes (e.g. up to 500 homes)</p> <p>Alternative Option 1 (Baseline scenario): Provide a smaller number of homes (e.g. up to 200 homes, based on the policy allocation up to 2026 in the Core Strategy)</p> <p>Alternative Option 2: Provide a larger number of homes (e.g. up to 800 homes)</p>	The Preferred Option goes beyond Core Strategy Policy CS6 by proposing more homes on the site than originally envisaged. This recognises the significant unmet housing need in Oxford, and is consistent with the Core Strategy's aim to that everyone has access to a decent home, suited to their household's needs, at a price they can afford. Alternative Option 1 reflects Policy CS6 most closely. Alternative Option 2 provides for the highest level of homes, which would most likely necessitate less employment but is a reasonable alternative given the size of the Northern Gateway site.	NG2: Mix of uses
Retail uses	<p>Preferred Option: Provide small retail units of an appropriate local scale on the site (e.g. up to 2,500m² gross floorspace)</p> <p>Alternative Option 1: Remove the retail uses to facilitate more development of primary uses</p> <p>Alternative Option 2: Provide for a mid-sized supermarket on the site (e.g. around 4,000m²)</p> <p>Alternative Option 3: Provide for a mid-sized supermarket (e.g. around 4,000m² gross) and some smaller retail units (e.g. up to 2,500m² gross)</p>	The Preferred Option would provide for complementary retail units at a small scale, appropriate for serving the new development. Alternative Option 1 would remove the retail use and free up land for other uses. Alternative Option 2 goes beyond Policy CS6, recognising that a larger retail unit might aid delivery and provide an alternative retail format. Alternative Option 3 also goes beyond Policy CS6, but provides the greatest range of retail services.	NG2: Mix of uses

Hotel with leisure uses	<p>Preferred Option: Provide a hotel on the site (e.g. up to 180 bedrooms) with associated leisure facilities (e.g. restaurant and gym)</p> <p>Alternative Option: Remove the hotel to facilitate more development of primary uses</p>	The Preferred Option is to provide a hotel, with associated leisure uses, which is a complementary use permitted by Policy CS6. The alternative would be to not pursue this use.	NG2: Mix of uses
Emergency Services Centre	<p>Preferred Option: Remove the emergency services centre to facilitate more development of primary uses</p> <p>Alternative Option: Provide an emergency services centre on the site (e.g. up to 10,000m2). Make policy provision for this allocation to revert to employment use if not delivered by a particular phase of the development.</p>	The Core Strategy Policy CS6 allows complementary uses, including potentially an emergency services centre. The Preferred Option removes this as a potential use, which in turn would free up more land for other uses.	N/A
Services area	<p>Preferred Approach: Encourage refurbishment of the services area to further enhance the approach to the city</p>	The Preferred Approach, to encourage refurbishment of the services area, adds specificity to Core Strategy Policy CS6.	Para. 5.10-5.11
Affordable housing	<p>Preferred Approach (Baseline scenario): Use the existing policy approach of requiring at least 50% of homes to be affordable</p>		Para. 5.17
Dwelling sizes	<p>Preferred Option (Baseline scenario): Use existing policy approach (set out in Balance of Dwellings SPD)</p> <ul style="list-style-type: none"> 1 bedroom homes: 10-15% 2 bedroom homes: 25-30% 3 bedroom homes: 40-55% 4+ bedroom homes: 10-15% <p>Alternative Option 1: Increase the proportion of smaller (1 and 2 bedroom) homes</p> <p>Alternative Option 2: Increase the proportion of larger (3 and 4+ bedroom) homes</p>	The Preferred Approach for affordable housing reflects the Core Strategy and Sites and Housing Plan: as it is the baseline scenario, it has not been tested in this SA. The Preferred Option reflects the currently adopted Balance of Dwellings SPD, which in turn supports Core Strategy Policy CS23. Alternative Option 1 recognises that higher densities can be achieved by providing smaller units, which may be appropriate for a 'gateway' development. Alternative Option 2 responds to the appropriateness of an edge-of-city site such as Northern Gateway to accommodate more, larger family dwellings.	Para. 5.18

<p>Access and Highways Measures</p>	<p>Preferred Option: Full transport solution:</p> <ul style="list-style-type: none"> • Cutteslowe roundabout improvements • Wolvercote roundabout improvements • Full signalisation of Pear Tree roundabout • Construction of off-site strategic link road between the A40 and A44 (Loop Farm roundabout) • Construction of single-carriageway site access road with junctions to A40 and A44 • Secondary site access from A40 & A44 • Public realm and environmental improvements to A40 and A44 <p>Alternative Option: mitigate impact of development: As above but:</p> <ul style="list-style-type: none"> • Partial signalisation of Pear Tree roundabout • Construction of dual-carriageway on-site link road and site access road with junctions to A40 & A44 	<p>The Preferred Option proposes a comprehensive highways improvement scheme. A key element would be the construction of an off-site link road to allow direct access between the A40 and A44, removing the need for much traffic to pass through the congested Wolvercote Roundabout. The Alternative Option is considered appropriate to mitigate the impact of additional travel arising from the development (but not necessarily general traffic growth in the area). This reflects closely the approach set out in Core Strategy Policies CS6 and CS13.</p>	<p>NG5: Highway access</p>
<p>Park and Ride capacity</p>	<p>Preferred Option: Provide a multi-storey P&R site with around 500 additional spaces</p> <p>Alternative Option 1: Extend P&R provision at surface level with around 500 additional spaces</p> <p>Alternative Option 2: Extend P&R provision further, with around 750 additional spaces in a multi-storey</p> <p>Alternative Option 3: Extend P&R provision further, with around 750 additional spaces at surface level</p> <p>Alternative Option 4 (baseline scenario): Maintain the existing level of parking (around 1,050)</p>	<p>The Preferred Option and Alternative Options 1, 2 and 3 respond to Core Strategy Policy CS6, which envisages regeneration of the Park and Ride site, and Policy CS14, which seeks to improve the capacity and attractiveness of Park and Ride in Oxford. The Preferred Option and Alternative Option 2 would see Park and Ride spaces re-provided or expanded within a decked car park that would be the least space-hungry option. Alternative Options 1 and 3 would see enlargement at surface level.</p>	<p>NG5: Highway access</p>
<p>Park and Ride location</p>	<p>Preferred Option (baseline scenario): Retain the Park and Ride facilities at the current location</p> <p>Alternative Option 1: Relocate the existing Park and Ride within the site (to opposite side of A44)</p>	<p>The Preferred Option represents the current status. Alternative Option 1 envisages relocating the site within the AAP area, the alternative being the opposite side of the A44.</p>	<p>NG5: Highway access</p>

Public transport	<p>Preferred Option: Full transport solution: provision of:</p> <ul style="list-style-type: none"> enhanced bus services along A40 & A44, with connection to Oxford Parkway rail station interchange facility/bus hub new bus stops/lay-bys & covered waiting facilities with Real Time Passenger Information Widen and/or reallocate road space along the A40 fronting the site to provide priority for buses Widen and/or reallocate road space along the A44 fronting the site to provide priority for buses further bus priority measures at junctions with pre-signals bus priority measures northbound on Woodstock Road <p>Alternative Option: Mitigate impact of development: provision of:</p> <ul style="list-style-type: none"> enhanced bus services along A40 & A44, with connection to Oxford Parkway rail station new bus stops/lay-bys & covered waiting facilities with Real Time Passenger Information Widen and/or reallocate road space along the A40 fronting the site to provide priority for buses Widen and/or reallocate road space along the A44 fronting the site to provide priority for buses 	The Preferred Option is a comprehensive package of improvements, to provide enhanced bus services connecting to the Parkway Station, extensive bus priority on the main approaches to Northern Gateway, light-controlled bus priority at junctions, improvements to bus stops and laybys, and an interchange/bus hub. This is more than is likely to be necessary to meet the Core Strategy's requirements. The Alternative Option is to deliver less extensive bus priority measures, bus stop improvements and enhanced bus services.	NG5: Highway access
Pedestrian and Cycle Links	<p>Preferred Option: Provision of:</p> <ul style="list-style-type: none"> high-quality, convenient cycle/footpath routes to nearby residential areas/services improved and additional crossings of the A40 & A44 to link development areas good-quality, convenient routes within the site and alongside the A40/A44 a high-quality, convenient cycle/footpath link to Oxford Parkway <p>Alternative Option (baseline scenario): As above but without:</p> <ul style="list-style-type: none"> a high-quality, convenient cycle/footpath link to Oxford Parkway 	The Alternative Option clarifies the requirements of Core Strategy Policy CS6 and Policy CS13 to prioritise access by walking and cycling, along with public transport, as part of a package of measures to mitigate the impact of development and provide good connections for future occupiers. The Preferred Option goes beyond these requirements by also providing for a bespoke link to the nearby Parkway Station.	NG4: Sustainable travel
Travel planning	Preferred Approach (baseline scenario): Require a Transport Assessment and Travel Plan as part of any planning application to demonstrate how the development will contribute to sustainable travel and the mitigation of any significant traffic impacts if the Transport Assessment shows this to be necessary	The Preferred Approach for a Transport Assessment and Travel Plan reflects Core Strategy CS13. As this would in any case be required whether or not a policy were included in the AAP, it has not been tested in this SA report.	Para. 6.4-6.5

Operation of car parking	<p>Option 1: Provide workplace parking in shared communal facilities for efficiency</p> <p>Option 2: Encourage workplace charging across the site</p> <p>Option 3: Introduce a Controlled Parking Zone within the site and in neighbouring areas</p>	The options for parking management are not mutually exclusive. They are all, however, based on a preferred approach of communal (unallocated) parking provision for the various commercial uses, which increases efficiency of use and minimises land take. Workplace charging would encourage use of modes other than single occupancy car to access the site. A Controlled Parking Zone may be necessary to help overall parking management, and prevent commuter parking in neighbouring areas.	NG6: Car parking
Parking standards	<p>Preferred Option: Compared to the standard policy approach, be more restrictive on parking standards for employment and retail uses (destination parking) but not on residential parking (use city-wide standards to reflect car ownership)</p> <p>Alternative Option 1: Tighten up parking standards for all uses across the site (beyond city-wide standards)</p> <p>Alternative Option 2 (Baseline scenario): Use existing city-wide parking standards</p>	The options stem from adopted Local Plan policies (OLP TR.3, S&H Plan HP16) which set maximum standards, and therefore allow lower amounts of parking in particular circumstances. Preferred Option seeks lower standards for employment and retail units, which is seen as an effective means of mitigating car journeys to the site in combination with public transport, cycling and walking infrastructure, whilst recognising the different purpose served by residential parking to be maintained at city-wide standards. Alternative Option 1 would also lower parking provided for residential uses to below city-wide maximum standards, which would encourage or require lower car ownership. Alternative Option 2 is the baseline scenario.	NG6: Car parking
Urban design	<p>Preferred approach: A design code for the Northern Gateway will be produced that will set out the broad parameters for the urban design and layout, related to the different uses proposed.</p>	The Preferred Approach requires production of a Design Code alongside the AAP, to set a framework of parameters guiding how new buildings and spaces will work together to achieve a high quality design befitting to its context.	NG7: Design and amenity
Scale and massing	<p>Option 1: Permit taller buildings (especially at particular locations) to provide the required development and maintain larger areas of the site as open space/landscaping</p> <p>Option 2: Restrict building heights to a lower level acknowledging that more of the site would need to be built out to provide the levels of development</p>	Option 1 encourages the use of higher buildings as a design feature, to provide distinctive landmarks and help users navigate around the development. Option 2 would limit building heights but would also require greater site coverage. The development of one of these options will ultimately be informed by a visual impact analysis of the site.	NG7: Design and amenity

Landscape and Open Space	<p>Preferred Approach: Provide useable and good quality open space around the office/employment buildings</p> <p>Option 1 (Baseline scenario): Use city-wide standard of providing at least 10% of the site area that is developed for housing, as public open space</p> <p>Option 2: Make provision for a greater proportion of residential site area as open space (e.g. 15%)</p>	The Preferred Approach relates to the office and employment development, and provides a policy requirement to maintain open space on the site rather than a very high level of site coverage. Options 1 and 2 relate to residential development. Option 1 is the baseline scenario for residential, as it is the same as Policy HP9 in the Sites and Housing Plan. Option 2 sets a higher than city-wide requirement for residential public open space	NG7: Design and amenity
Gateway	<p>Preferred option: Provide opportunities for landmark buildings (at particular locations) within the development and frame views to help create a gateway feel</p> <p>Alternative option: Do not pursue the gateway concept for the development</p>	The Preferred Option pursues the 'gateway' concept through use of building design to give a gateway feel to the northern approach into Oxford. The alternative option would not pursue this aspiration.	NG7: Design and amenity
Green Belt	<p>Preferred Approach (baseline scenario): Carry out a highly focussed review of the inner Green Belt boundary to identify whether exceptional circumstances exist to justify removing those portions within the AAP boundary from the Green Belt</p>	The Preferred Approach reflects Core Strategy Policies CS3 and CS6, and carries out the Core Strategy commitment to carry out a focused Green Belt review. The approach makes clear that the principle of exceptional circumstances will have to be demonstrated for any change to the boundaries to occur. This approach is the same as the Core Strategy (Policy CS3: Green Belt and para. 3.4.39 bullet 3) and as such represents the baseline scenario. It has not, therefore, been assessed as part of this SA as the Core Strategy SA has already tested this policy.	NG1: Green Belt
South of A40 Green Belt	<p>Option 1: Move the inner Green Belt boundary back to the track that runs through the site so that there is no Green Belt to the east of the track but that the fields designated as a Site of Local Importance Nature Conservation and Public Open Space (Goose Green) are maintained within the Green Belt</p> <p>Option 2: Move the inner Green Belt boundary back to the canal corridor so that there is no Green Belt to the east of the canal</p> <p>Option 3 (baseline scenario): Maintain the inner Green Belt boundary at the current position</p>	Option 1 would, subject to demonstration of exceptional circumstances, see the Green Belt boundary moved south-west to align with the boundary of the AAP area. Option 2 would see the boundary moves further still to the natural boundary formed by the Oxford Canal, which would remove green belt designation from the SLINC and Goose Green, however the designations (as Site of Local Importance for Nature Conservation and as Public Open Space) protecting this land would remain. Under Option 2, the AAP boundary would also be amended to include this area. Option 3 would see no change to the Green Belt designation south of the A40	NG1: Green Belt

Pear Tree Farm Green Belt	<p>Option 1 (baseline scenario): Maintain the inner Green Belt boundary at the current position so that Pear Tree Farm continues to be within the Green Belt</p> <p>Option 2: Move the inner Green Belt boundary back to the administrative boundary of the City Council so that, that part of, Pear Tree Farm is no longer within the Green Belt</p>	Option 1 would see no change to the Green Belt at the northern extremity of the site. The Core Strategy already commits the Council to carrying out a Green Belt review, therefore the status quo is not the baseline scenario and is assessed as a variant from the baseline. Option 2 would, subject to demonstration of exceptional circumstances, see the Green Belt boundary moved to align with the city administrative boundary.	N/A
Drainage	<p>Preferred Approach: Only permit development where it has been shown:</p> <ul style="list-style-type: none"> • that it will not result in changes to the hydrological regime of the Oxford Meadows Special Area of Conservation; and: • through a Flood Risk Assessment that it will not increase flood risk either on the site or elsewhere 	The Preferred Approach re-emphasises the policy framework set out in the Core Strategy. As the Preferred Approach is the same as the Core Strategy (Policy CS11 – Flooding and paragraph 3.4.40) it represents the baseline scenario. It has not, therefore, been assessed as part of this SA as the Core Strategy SA has already tested this policy.	NG8: Oxford Meadows SAC
Energy and resources	<p>Preferred Approach: Use existing energy and resource efficiency policy framework as a basis. Require buildings to meet the current standards of energy efficiency and renewable energy in place at the time of reserved matters applications. Support the development of a shared/district renewable energy scheme within the site.</p>	The first part of the Preferred Approach restates the Core Strategy policy framework. As the preferred approach is the same as the Core Strategy (Policy CS9) it represents the baseline scenario. It has not, therefore, been assessed as part of this SA as the Core Strategy SA has already tested this policy. The second part of the Preferred Approach reflects national policy (NPPF) and Core Strategy CS9 in supporting the development of a central energy centre as a more energy efficient means of providing energy to individual buildings.	NG9: Energy and resources
Air quality and Noise	<p>Preferred Approach: Only permit residential development where it can be shown that future residents will benefit from a good quality living environment both in terms of noise and air quality.</p>	The Core Strategy and Saved Policies of the Local Plan seek to protect existing and future residents from any noise or air quality impacts, or other sources of nuisance. As the Preferred Approach pulls together policy requirements from the Core Strategy (supporting text to Policy CP6 – Northern Gateway) and Oxford Local Plan 2001-2016 (Policies CP.19, CP.21 & CP.23) it represents the baseline scenario. It has not, therefore, been assessed as part of this SA as the Core Strategy SA has already tested this policy.	NG7: Design and amenity

Nature conservation	Preferred Approach: Only permit development that does not have an impact on the integrity of the Oxford Meadows Special Area of Conservation	The Core Strategy, supported by a Habitat Regulations Assessment, requires the fullest regard for any impacts on the Oxford Meadows SAC. This Preferred Approach is the same as the Core Strategy (paragraph 3.4.41) and as such represents the baseline scenario. It has not, therefore, been assessed as part of this SA as the Core Strategy SA has already tested this policy.	NG8: Oxford Meadows SAC
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6. MEASURES TO BE TAKEN TO MONITOR THE SIGNIFICANT SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE NORTHERN GATEWAY AREA ACTION PLAN

6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require local authorities to “monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”

6.2 A detailed framework has been prepared to monitor the implementation of the Northern Gateway Area Action Plan. This framework covers most of the significant environmental, social and economic effects of implementing the strategy. The SA process has suggested a limited number of additional monitoring indicators.

6.3 Table 6.1 shows the monitoring indicators that aim to measure likely effects of the plan, targets to be achieved, and where the monitoring will take place and be reported. In most cases the monitoring will be carried out by the City Council and the results will be reported in the Annual Monitoring Report.

Table 6.1: SA Monitoring Framework

Sustainability Objective	Indicator	Target	Where monitored?
Objective 2: Encourage urban renaissance by improving efficiency in land use, design and layout and to create and sustain vibrant communities	Design code and site master plan respond to evidence base and set out appropriate design principles to guide development and create a positive ‘gateway’	100% of schemes approved comply with the Design Code	AMR
Objective 3: Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home	Number of new homes built at Northern Gateway	Up to 500 homes provided	AMR
	Mix of housing size	100% of residential schemes to comply with mix in Balance of Dwellings SPD	AMR
	Number of affordable housing	50% provision of affordable homes	AMR
Objective 6: Raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work	Ensure adequate access to school provision in adjoining areas	All residents to be within walking or cycling time to a primary and secondary school	AMR
Objective 7: Provide accessible essential services and facilities	% of population within 3km of one or more primary schools, and one or more GP surgeries, with spare capacity (and accessible by walking and cycling)	All residents to be within 30 minutes public transport travel time of key services	AMR
Objective 8: Provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all	Access to and the use of open spaces and leisure facilities	As a city wide average ensure that 5.75ha open space is maintained per 1,000 population	AMR
	Provision of onsite open space	15% provision, including 15% within residential areas	AMR

Sustainability Objective	Indicator	Target	Where monitored?
Objective 9: Conserve and enhance Oxford's biodiversity	Quality of SAC condition	No reduction in % of the site in favourable condition, including in terms of air quality, recreational impacts and water quality	AMR
Objective 10: Protect and enhance the historic environment and heritage assets	Development responds appropriately to the setting of the Wolvercote and Godstow Conservation Area and Port Meadow, and does not adversely affect the setting of any listed buildings	Submission of, and agreement with the Council, of a Landscape Character Analysis and Visual Impact Analysis in advance of applications	AMR
Objective 11: Reduce traffic congestion and associated air pollution by improving travel choice, shortening length and duration of journeys and reducing the need to travel by car/lorry	Proposals informed by a comprehensive Travel Plan	Submission of a transport assessment and comprehensive Travel Plan to accompany outline application	AMR
	New or improved links for cyclists, pedestrians and public transport	100% of approved permissions to comply with minimum cycle parking standards, and provision of new links and improvements	AMR
	Protect air quality	Air quality within the AQMA does not significantly worsen	AMR
Objective 12: Maintain and improve soil and water quality, manage water resources and reduce surface water runoff and reduce surface water flood risk	Groundwater quality related to the SAC	No adverse effects on integrity of the SAC in terms of hydrology	AMR
Objective 13: Increase energy and resource efficiency (including minimising waste) and renewable energy, with the aim of mitigating and adapting to climate change	Climate change mitigation and adaptation measures incorporated into design eg SUDS	100% of all qualifying development to comply with NRIA SPD requirements	AMR
	Delivery of shared energy scheme	Shared/renewable energy delivered	AMR
Objective 14: Achieve sustainable economic growth (includes the development of a dynamic, diverse and knowledge based economy)	Total amount of new employment space created	Deliver up to 90,000m2 new floorspace phased over the Plan period	AMR
	Employment focussed on knowledge-based and high-tech companies and operations	100% of employment Permissions demonstrate a link to knowledge economy. Overall increase in knowledge-based economy jobs in the City	AMR
	Number of apprenticeships and training schemes offered during both the construction phases and upon occupation	100% applications to consider this option	AMR
	% local people employed in construction	100% applications to consider this option	AMR

7. HABITATS REGULATIONS ASSESSMENT

7.1 Habitats Regulations Assessment involves up to four consecutive stages, with the conclusions of each stage determining whether the next stage is required:

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

7.2 Oxford City Council undertook a Habitats Regulations Assessment (HRA) "in-house", with auditing undertaken by Levett-Therivel Sustainability Consultants. The HRA was published in July 2014 (CD1.7). The HRA for the Northern Gateway Area Action Plan covered stages 1 and 2 as detailed above. The screening stage ruled out some impacts from the Northern Gateway Area Action Plan based on the assessment that was undertaken at the Core Strategy stage. The screening stage concluded that further work was required to determine the likely significance of the impact of the Northern Gateway Area Action Plan on the Oxford Meadows Special Area of Conservation (SAC) in relation to the following conservation objectives: Air Quality; Balanced Hydrological Regime and Water Quality; and Recreational Pressure. This further work was undertaken as part of an Appropriate Assessment (stage 2 above).

7.3 The appropriate assessment stage considered the potential for impacts of the Northern Gateway Area Action Plan on the Oxford Meadows SAC in terms of the relevant conservation objectives for the site – Air quality; Balanced Hydrological Regime/ Water Quality; and Recreational Pressure. The HRA included a section on each of these.

7.4 In terms of Air Quality, a Preliminary Air Quality Assessment was undertaken. This was submitted as evidence to the Examination (CD4.34). The HRA documented the key findings from the Preliminary Air Quality Assessment, which was based on a whole year's worth of monitoring data. An air quality model was developed which was used to predict the baseline air quality along 200m transects at various points around the Oxford Meadows SAC. Future baseline scenarios were also modelled, with and without the Northern Gateway Area Action Plan in order to work out the likely impacts of Nitrogen Deposition associated with the development. The air quality model took a precautionary approach in terms of how predicted vehicle emission improvements were taken into account in the development of the predicted future scenarios. Given the results of the air quality modelling, it is considered that the Northern Gateway Area Action Plan is not likely to have a significant effect on the integrity of the SAC in terms of this conservation objective.

7.5 In terms of the Balanced Hydrological Regime and Water Quality, additional evidence was provided to support the HRA and the Area Action Plan. An Interim Hydrological Note was provided as supporting evidence at the Proposed Submission Stage, and a Full Hydrological Statement was submitted to the Examination. These reports demonstrated that although there was an area of alluvium that runs along the southern-most portion of the land to the south of the A40. The HRA suggested mitigation for this, and this wording was put taken to the Area Action Plan. Namely that should development be proposed on the area of differing geology on the land to the south of the A40 that further survey work would be required. The AAP also proposed a buffer strip of green

infrastructure along this same area of land. The HRA concluded, that given the mitigation proposed, that the Northern Gateway Area Action Plan is not likely to have a significant effect on the integrity of the Oxford Meadows SAC in terms of this conservation objective.

7.6 In terms of recreational pressure, Natural England were consulted early in the process and agreed that the visitor survey data used to inform the HRA for the Sites and Housing Plan was appropriate to be used for the Northern Gateway Area Action Plan. In terms of recreational pressure, the survey data and analysis, which used a methodology agreed in partnership with Natural England demonstrated that the Northern Gateway Area Action Plan is not likely to have a significant effect on the integrity of the Oxford Meadows SAC in terms of this conservation objective. Notwithstanding this, the Area Action Plan proposed an additional amount of public open space to be included as part of this development. The AAP therefore proposed 15% of the site to be used as publicly accessible open space, as opposed to the 10% that is usually associated with developments in the city.

7.7 In-combination impacts were also assessed as part of the HRA. Other plans and programmes that were considered are listed at Table 2.2 of the HRA. In-combination impacts were also considered as part of the appropriate assessment stage when the impact of the Northern Gateway AAP was assessed against the conservation objectives for the Oxford Meadows SAC.

7.8 In terms of Air Quality, other planning documents within Oxford's Local Plan were considered – namely the Core Strategy and Sites and Housing Plan. In-combination impacts were also examined in terms of the Local Plans for the surrounding district authorities and the County Council's Minerals and Waste Plan. The HRA for the Northern Gateway AAP concluded, in terms of "in-combination" impacts, that there is unlikely to be, given the best available evidence, any significant in-combination effects in terms of air quality on the Oxford Meadows SAC.

7.9 In-combination impacts were also assessed in terms of potential impacts of the Northern Gateway on the Balanced Hydrological Regime/ Water Quality. The HRA assessed known sites on or near the Gravel Terrace and noted the conclusions of the HRA for the Sites and Housing Plan which included the use of saved policies from the Oxford Local Plan 2001-2016; a requirement for project level assessment for the highlighted sites, should basement development be proposed; and the use of appropriate Sustainable Drainage Systems to be provided in all the highlighted developments to ensure that the amount of surface water that is recharged to groundwater is maintained.

7.10 The section on recreational impacts also looked at potential impacts of the Northern Gateway AAP 'in-combination' with other plans and projects. In particular, the Core Strategy and the Sites and Housing Plan were considered that because the of the reasons previously set out in the HRAs for the Core Strategy and the Sites and Housing Plans there were unlikely to be any 'in-combination impacts'. The potential impact of the closest residential development outside of the City boundary likely to have an 'in-combination impact' was also considered and the HRA concluded that this development would also be unlikely to have an 'in-combination' impact on the Oxford Meadows SAC.

7.11 The Inspector referred to the HRA in paragraphs 102-125 of her report. The report goes into detail about each of the conservation objectives and how the Northern Gateway AAP could potentially impact upon them. The most pertinent paragraph – 125 is reproduced below:

"125. The matters identified in the CS [Core Strategy] for further investigation, hydrological risk, air quality, and recreational pressure have been the subject of further study to support the AAP. Natural England is satisfied with the HRA for the AAP and the conclusions drawn

from it. The AAP provides safeguards for the biodiversity of the area, and is supported by more detailed evidence than the CS. Assessments should be proportionate to the level of detail proposed, and more detailed mitigation measures are not required for the soundness of the AAP. I am satisfied that the AAP HRA is satisfactory and the AAP is sound in relation to biodiversity.”

7.13 Prior to the adoption of the Northern Gateway Area Action Plan, a final version of the HRA was published to bring together the previously published material.