

# Sustainability Appraisal (Regulation 19)

# Oxford Local Plan 2040

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# 1. Non-Technical Summary

## 1.1 Introduction

The Oxford Local Plan 2040 will update the Oxford Local Plan 2036. It will allocate sites for housing, employment and other uses, and manage development in the city. It includes measures to improve public transport, protect the historic environment and nature, reduce carbon emissions, and protect against flooding. It will be used to make decisions about planning applications.

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 plan has few negative impacts and many positive impacts. An SA/SEA ‘scoping report’ was published in July 2021 alongside an Issues Consultation for the Local Plan 2040. In September 2022, an SA/SEA alternatives report assessed the impacts of plan options as part of the development of the Local Plan Preferred Options consultation (‘Reg. 18’).

This SA/SEA report updates the scoping report, and assesses the impacts of the submission Local Plan 2040 (‘Reg. 19’).

## 1.2 Policy context

The *National Planning Policy Framework* 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. The *Environment Act 2021* will require development to deliver at least 10% biodiversity net gain. The *Levelling Up and Regeneration Bill* would make many changes, 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.

Government dropped its plans for an Oxford-Cambridge “*knowledge arc*” in 2022, as well as plans for an East-West expressway and 1 million new homes in the region: regional partnerships are expected to take forward any such work. The refresh of *Oxfordshire’s Strategic Economic Plan* is likely to promote less population and jobs growth, but still higher than natural growth rates. Work on the *Oxfordshire Plan 2050* stopped in 2022. The *Oxfordshire Infrastructure Strategy* of 2017 supports an East-West rail link between Oxford, Milton Keynes and Bedford; redevelopment of Oxford Station; and upgrades to the A34. The *Oxfordshire Local Transport and Connectivity Plan* of 2022 aims, by 2040, to replace or remove about half of current car trips in Oxfordshire, and deliver a net-zero transport network.

Oxford declared a *climate emergency* in 2019, and has set out an Action Plan for bringing about a net zero carbon city by 2040. It has been piloting a *Zero Emission Zone* since 2022, and may expand this to much of the city centre. *Low Traffic Neighbourhoods* have been in place in Cowley and East Oxford since 2021. From 2024, six *pilot traffic filters* will prevent cars but allow other forms of transport.

### 1.3 Sustainability context and existing problems

Table 1.1 summarises the current status in Oxford, and the likely situation in 2040 if the Local Plan 2040 was not in place.

Table 1.1 Current situation and likely future without the plan			
SA/SEA topic	Current situation	Likely future without plan	Summary findings
<b>1. Carbon emissions</b>	-	-	Despite an overall downward trend, carbon emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040.
<b>2. Resilience to climate change</b>	--	-	Between 2,000 and 5,000 homes are currently at flood risk. This is likely to increase with climate change. A flood reduction scheme is proposed for the west side of Oxford.
<b>3. Efficient use of land</b>	0	0	The high housing need and high cost of building on previously developed / contaminated sites means that there is more pressure to develop greenfield sites.
<b>4. Housing</b>	--	--	House prices in Oxford are very high and are likely to rise faster than average salaries. Delivering affordable housing is a priority. There is not enough capacity within Oxford to meet all of the city's housing needs to 2040.
<b>5. Inequalities and health</b>	-	-	The health of Oxford's residents is generally good, but the city's overall wealth masks local areas of poverty and health inequalities.
<b>6. Services, facilities and infrastructure</b>	+	+	The pandemic and other factors have led to the closure of some community and cultural facilities, and shown people's reliance on the Internet.
<b>7. Green infrastructure</b>	++	0	Oxford has much good quality green space. As the population increases there will be more pressure on this space.
<b>8. Traffic and air pollution</b>	--	0	Oxford's roads are congested and air quality is poor despite good bus services and high levels of cycling. The new zero emission zone, low traffic neighbourhoods and traffic filters should improve this.
<b>9. Water</b>	-	--	Oxford is in an area of serious water stress. There may not be enough water by 2040. Water quality in the area is mostly moderate but poor in some parts.
<b>10. Biodiversity</b>	-	0	Biodiversity is falling worldwide. The Environment Act requires 10% biodiversity gain in new development.
<b>11. Urban design and historic env.</b>	++	+	Oxford has a high-quality landscape and heritage. High levels of development and tourism continue to put a strain on historic sites and the landscape.
<b>12. Employment and economy</b>	++	++	Oxford has a very strong economy, with high employment. There is strong demand for research and development uses. Oxford's housing shortage cause problems for businesses.

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.
- 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.

#### 1.4 SA/SEA Framework

This SA/SEA uses the framework at Table 1.2 to assess the impacts of the Local Plan 2040 policies. An adapted framework is used for development sites.

<b>Table 1.2 SA/SEA Framework</b>	
1.	To achieve the city's ambition to reach net zero <b>carbon emissions</b> by 2040
2.	To build <b>resilience to climate change</b> , including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.
3.	To encourage the <b>efficient use of land</b> through good design and layout, and minimise the use of greenfield and Green Belt land
4.	To meet <b>local housing needs</b> by ensuring that everyone has the opportunity to live in a decent affordable home
5.	To reduce poverty, social exclusion, and health <b>inequalities</b>
6.	To provide accessible essential <b>services and facilities</b>
7.	To provide adequate green infrastructure, <b>leisure and recreation</b> opportunities and make these readily accessible for all
8.	To reduce <b>traffic and associated air pollution</b> by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry
9.	To achieve <b>water</b> quality targets and manage water resources
10.	To conserve and enhance Oxford's <b>biodiversity</b>
11.	To promote <b>good urban design</b> through the protection and enhancement of the <b>historic environment</b> and heritage assets while respecting local character and context and promoting innovation.
12.	To achieve sustainable inclusive <b>economic growth</b> , including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector

Key throughout this report:

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

## 1.5 Alternatives

The planning team considered different ways of writing the plan.

### A. Different approaches to **greenfield sites** (sites not previously developed):

A1. Direct development away from greenfield sites, but assess whether there are any Green Belt or other greenfield sites that are not important for biodiversity, flood storage, or the rest of the Green Belt.

A2. Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites.

A1 is preferred because it provides the best balance between competing sustainability objectives.

### B. Different approaches to **housing requirements**:

B1. Capacity-based / constraint-based housing requirement (thought to be c7,852 dwellings 2020-2040 at the options stage, now known to be 9,612)

B2. Housing requirement based on the government's Standard Method calculation of need. (c14,580 dwellings 2020-2040)

B3. Housing requirement that seeks to achieve and support economic growth; seek to meet full affordable housing need (more housing than B2).

B1 is preferred. It meets government requirements but prevents unsuitable sites from being developed.

### C. Different approaches to **employer-linked affordable housing**:

C1. Allow employer-linked affordable housing to be built on specified sites.

C2. Do not have an employer-linked housing policy.

C1 is preferred because having this policy in the Oxford Local Plan 2036 has resulted in some employers exploring this option. It helps to provide affordable housing.

### D. Different approaches to **Houses in Multiple Occupation (HMO)**:

D1. Allow a maximum of 20% HMOs in any area

D2. Allow new purpose-built HMOs in appropriate locations.

D3. Concentrate HMOs in certain areas

D4. Do not have any restriction on HMOs.

A combination of D1 and D2 is preferred because this approach has over time helped to manage the impact of HMOs.

### E. Different approaches to the **balance of jobs and housing**:

E1. Try to meet employment needs, but prioritise housing, even if that means that employment needs cannot be met in full within the city.

E2. Grow employment-generating uses, to try to meet all forecast job needs within the city.

E3. Provide a broad employment base, including warehouse and small light-industrial sites.

E1 is preferred. Housing needs to be prioritised because lack of housing impacts on the economy, reduces housing affordability, and can lead to overcrowding.

F. Different approaches to the **location of new employment uses**:

F1. Intensify and modernise existing employment sites, and sites in the city and district centres.

F2. Do not allow new employment-generating uses outside of existing sites.

F3. As F1, but allow new employment uses next to a few existing sites.

F4. Use national policy and other plan policies to determine new employment sites.

A combination of F1 and F2 is preferred because focusing employment use on existing sites frees up other sites for other uses, particularly housing.

G. Different approaches for **delivering net gains in biodiversity**:

G1. Deliver 10% net gain ideally on site, otherwise in the local neighbourhood or in the Nature Recovery network.

G2. Require more than the legally-required 10% net gain on certain sites.

G1 is preferred. G2 can probably not be achieved onsite for many development sites in the city. Instead, the Local Plan seeks to drive onsite greening in other, more flexible ways tailored to context of city and its constraints.

H. Different approaches to **retrofitting existing buildings**:

H1. Support energy efficiency measures for all existing buildings that are not heritage assets.

H2. For heritage assets, support energy efficiency measures where their benefits outweigh harm.

H3. Do not include a retrofitting policy.

A combination of H1 and H2 are preferred, recognising that the Local Plan needs to enable and encourage retro-fit of existing buildings wherever possible.

I. Different approaches to **parking standards**:

I1. New housing to be car-free in sites with good access to public transport and local shops, and low-car in other sites.

I2. No additional parking on non-residential sites, and less parking where there is good access to a range of facilities.

I3. All new development to be car-free.

I4. Low car but not car-free parking standards, possibly differing according to location.

The preferred alternative is a combination of options I1, I2, and I4. Oxford is a compact city where land is scarce so land for parking should be limited. However, it is not realistic to

make development low car if it is not well served by public transport and local shops, and if opportunities for parking nearby are not limited by a Controlled Parking Zone. For non residential development, the Local Plan seeks a reducing in parking.

From an original list of 84 possible **development sites** which were consulted on at regulation 18 stage, 50 have been allocated. They were individually assessed, and measures have been identified to minimise the impacts of each site.

## 1.6 Assessment of the plan impacts

The vision, themes and policies in the Local Plan 2040 have been assessed using the SA/SEA Framework of Table 1.2. Table 1.3 shows the results. Appendix A gives more details. The impact of developing individual sites has also been assessed using a modified version of Table 1.3.

**Table 1.3 Assessment of plan vision, themes, policies and sites**

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
<b>Vision</b>	++	++	+	0	++	0	+	0	+	+	+	++
<b>Themes</b>												
Healthy and inclusive	0	0	0	++	+	+	0	+ -	0	-	0	0
Prosperous with a globally important role	-?	0	0	0	+	?	0	-	-?	-?	0	++
Green, biodiverse and resilient	+	+	0	0	0	0	+	0	+?	++	0	0
Utilizes its resources with care	+	+	+	0	0	+?	0	0	+	+	0	0
Respects its heritage, high-quality design	0	0	0	-?	0	0	0	0	0	0	++	+ -
Liveable, with strong communities	+ -	0	+	0	+	++	0	+ -	0	0	0	0
<b>Policies</b>												
S1 Spatial strategy & presumption in favour of	?	0	0	?	0	0	0	++	0	0	0	+
S2 Design code & guidance	0	0	+	0	+	0	0	0	0	0	++	0
S3 Infrastructure delivery in new developmen	+?	0	0	0	0?	0+	0	+	0	0	0	0
S4 Plan viability	-?	0	0	+ -	0	0	0	-?	0	0	0	+
H1 Housing requirement	-	-	+ -	+ -	+ -	-?	0	+ -	0	?	?	+ -
H2 Delivering affordable homes	0	0	0	+	+	0	0	0	0	0	0	0
H3 Affordable housing contribution from new	0	0	0	+	+	0	0	0	0	0	0	+ -
H4 Affordable housing contributions from self	0	0	0	+ -	+ -	0	0	0	0	0	0	+
H5 Employer-linked affordable housing	+	0	?	+	?	0	0	+	0	+ -	?	+
H6 Mix of dwelling sizes (number bedrooms)	0	0	+?	+	0	0	0	0	0	0	0	0
H7 Development involving loss of dwellings	0	0	0	0	0	+?	0	0	0	0	0	0
H8 Houses in Multiple Occupation	0	0	+	+ -	+	0	0	0	0	0	0	+ -
H9 Location of new student accommodation	0	0	+	0	0	0	0	0	0	0	0	+ -
H10 Linking new academic facilities with the	0	0	0	+	0	0	0	0	0	0	0	0
H11 Homes for travelling communities	0	0	?	+	+	0	?	0	0	0	0	0
H12 Homes for boat dwellers	0	0	0	0	0	0	0	0	0	0	0	0



	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
H13 Older persons and other specialist accom	0	0	0	+	+	0	0	0	0	0	0	0
H14 Self-build & custom housebuilding	0	0	-?	+	?	0	0	0	0	0	0	0
H15 Hostels	0	0	0	+	+	0	0	0	0	0	0	0
H16 Boarding school accommodation	0	0	0	0	0	0	0	0	0	0	0	+
E1 Employment strategy	+	0	++	+?	0	0	0	+?	0	0	0	+
E2 Warehousing and storage uses	0	0	+	+?	0	0	0	+?	0	0	0	-?
E3 Affordable workspace	0	0	?	0	+	+	0	0	0	0	0	+
E4 Community employment plans	0	0	0	+?	+?	0	0	0	0	0	0	+
E5 Tourism and short stay accommodation	0	0	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 & provision of new green &	0?	+	-	+?	0	0	++	+	+?	+	+	0
G3 Provision of new green & blue features	+	+	-	+?	0	0	0	+?	0	+?	+	0
G4 Delivering mandatory net gains in biodiver	+?	0	-?	-?	0	0	+	0	+?	+?	0	0
G5 Enhancing onsite biodiversity in Oxford	0	0	0	0	0	0	0	0	0	+	0	0
G6 Protecting Oxford's biodiversity including	0	0	-?	0	0	0	+	0	0	+	0	0
G7 Flood risk and Flood Risk Assessments	0	+	+?	-?	0	0	0	0	0	0	0	+?
G8 Sustainable Drainage Systems (SuDS)	0	+	-	-?	0	0	+	0	+	+?	0	0
G9 Resilient design and construction	+?	++	0	+	+	0	0	0	+	0	+	0
R1 Net Zero buildings in operation	++	0	+?	+?	+	0	0	+?	0	+?	-?	+
R2 Embodied carbon in the construction proc	+	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
R5 Land contamination	0	0	+	0	+	0	0	0	0	0	0	0
R6 Soil quality	0	0	+?	0	0	0	0	0	0	0	0	0
R7 Amenity and environmental health impact	0	0	+?	+?	0	0	0	0	0	0	0	+?
HD1 Conservation areas	0	0	-?	-?	0	0	0	0	0	0	+	0
HD2 Listed buildings	0	0	-?	-?	0	0	0	0	0	0	0	0
HD3 Registered Parks and Gardens	0	0	-?	-?	0	0	0	0	0	0	0	0
HD4 Scheduled Monuments	0	0	-?	-?	0	0	0	0	0	0	0	0
HD5 Archaeology	0	0	-?	-?	0	0	0	0	0	0	0	0
HD6 Non-designated heritage assets	0	0	-?	-?	0	0	0	0	0	0	0	0
HD7 Principles of high-quality design	0	0	0	+?	0	0	0	0	0	0	+	0
HD8 Using context to determine appropriate	+?	0	++	+	+	+?	0	+	0	0	+?	+?
HD9 Views and building heights	0	0	-?	-?	0	0	0	0	0	0	0	0
HD10 Health impact assessment	0	0	0	+	+	0	0	0	0	0	0	0
HD11 Privacy, daylight and sunlight	0	0	-?	-?	0	0	0	0	0	0	0	0
HD12 Internal space standards for residential	0	0	-	+	0	0	0	0	0	0	0	0
HD13 Outdoor amenity space	0	+?	+?	+?	+?	0	0	0	0	0	+	0
HD14 Accessible and adaptable homes	0	0	-?	+	?	0	0	0	0	0	0	0
HD15 Bin & bike stores & external servicing	0	0	?	0	0	0	0	+	0	0	0	0
C1 Town centre uses	+	0	+	?	0	++	0	++	0	0	0	+
C2 Maintaining vibrant centres	+	0	0	0	+	++	0	+	0	0	+?	0
C3 Protection, alteration & provision of local	0	0	0	0	0	0	0	0	0	0	0	0
C4 Protection, alteration & provision of learn	0	0	+	0	0	+	-?	0	0	0	0	0

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
C5 Protection, alteration & provision of cultur	0	0	+	0	0	+	0	0	0	0	0	+
C6 Transport assessments, travel plans &	+/-	0	0	0	0	0	0	+/-	0	0	0	+
C7 Bicycle parking design standards	+	0	+/-	+/-	+	0	0	+	0	0	0	0
C8 Motor vehicle parking design standards	+	+	+	+/-	+/-	0	0	+	0	0	0	-?
C9 Electric vehicle charging	+	0	0	0	0	++	0	+	0	0	-?	0
<b>Areas of Focus</b>												
Northern Edge of Oxford	--	-	-	+/-	0	--	+	--	-?	--	0	++
Cowley Branch Line and Littlemore	-	-	++	+	++	?	?	+/-	-?	0	0	++
Marston Road and Old Road	-	0	+	+	0	+	0	+	-?	-	-	+
North of the City Centre	0	0	+	+?	0	0	0	0	0	-?	+	++
West End and Botley	-	-	++	?	0	0	0	-	0	-?	+	++

Table 1.4 is a summary of the plan's overall impacts. Other plans, projects and underlying trends will have additional impacts.

**Table 1.4 Overall impacts of the Local Plan 2040**

SA/SEA topic	Overall impact of the plan	
<b>1. Carbon emissions</b>	+/-	The plan policies on net zero carbon, employer-linked affordable housing, building retrofits, restricted car parking and vibrant local centres promote walking, cycling and public transport. However its plans for 9,612 new homes will increase the number of people in Oxford, which will increase carbon emissions, at least in near term though broader changes such as decarbonisation of energy grid and transition to EVs should reduce this over time.
<b>2. Climate change resilience</b>	+/-	The plan policies on flood risk, sustainable drainage systems and resilience strongly support climate change resilience. Green infrastructure and limited car parking will help to prevent the urban heat island effect and support shading. Providing 9,612 new homes could, however, further urbanise the city, and increase the potential for run-off and flooding. The sites at Osney Mead and Botley Road are particularly prone to flooding.
<b>3. Efficient use of land</b>	+/-	The plan policies on housing density, more intense use of employment land, student housing, and restricted car parking all help to make most efficient use of land in Oxford. Policy H1, which aims to provide 9,612 new homes in Oxford, would require use of greenfield land, but would reduce the need for housing land

SA/SEA topic	Overall impact of the plan	
		elsewhere in Oxfordshire, where it would typically not reach the same densities and would require more parking space.
<b>4. Local housing need</b>	-	<p>Oxford currently has too few homes compared to jobs, making home ownership and market rental unaffordable for many people. There is also much in-commuting. Oxford needs 1,322 homes per year, including 740 affordable homes per year. This is more than the capacity of the city to deliver. Policy H1 provides for at least 9,612 new homes between 2020 and 2040 (481 homes per year). Policies H2-H5 aim to provide affordable homes, and policies H8-H15 focus on providing specialist accommodation for people who need temporary accommodation, students and boarding school pupils, Gypsies and Travellers, boat dwellers, and older people. Overall, the plan will reduce local housing need but there will still be under-provision which adjacent local authorities would need to fill.</p> <p>As a result of a memorandum of cooperation of 2016, the other Oxfordshire authorities' current local plans are providing for about 15,000 homes to deal with Oxford's unmet housing needs. However, Since the Oxfordshire Plan 2050 was shelved and with the Duty to Cooperate no longer being required, the other Oxfordshire authorities may be less likely in the future to provide for Oxford's outstanding housing need.</p>
<b>5. Inequalities</b>	+	The plan strongly supports walking, cycling and public transport, helping people who do not have access to a car. The Local Plan also aims to provide significant amounts of affordable housing through policies H2-H5. Its focus on healthy travel and green infrastructure also helps to address health inequalities. Policy CBLLAOF will improve access and place-making in Cowley and Littlemore.
<b>6. Services and facilities</b>	0	The plan aims to ensure that adequate infrastructure, including services in district and local centres, are available to support Oxford's housing and employment growth. The plan aims to prevent the loss of community facilities, schools and cultural sites.
<b>7. Leisure, recreation</b>	0	The plan says little about leisure and recreation. Its policies on nature would have an indirect positive impacts.
<b>8. Traffic and air pollution</b>	++	Many of the plan policies, and the plan overall, strongly support walking, cycling and public transport. This includes policies on low-car development, vibrant centres, high(er) density development, limited car parking, and bike parking. Indirectly, these will help to reduce traffic and air pollution.
<b>9. Water</b>	-	The plan says little about water quality. It expects new housing to use no more than 110 litres of water per person per day. The policies on green infrastructure, biodiversity net gain and sustainable drainage systems support good water quality. However, the planned 9,612 new homes will increase water use and run-off.

SA/SEA topic	Overall impact of the plan	
<b>10. Biodiversity</b>	+/-	The plan has strong policies to support and improve nature. Its policies on climate change, sustainable drainage and air quality also indirectly support nature. However, the planned 9,612 homes will involve building on 19 greenfield sites, reducing their biodiversity. Eight of the sites are on or next to nature conservation areas, and 10 are on or next to water bodies.
<b>11. Design and heritage</b>	-	The plan's heritage policies aim to protect the city's heritage. Its design policies promote high-quality design. However, the plan policies on renewable energy and electric vehicle charging, and the planned construction on 19 greenfield sites, will negatively affect the landscape and townscape. The proposed development include 15 in Conservation Areas and 7 that contain listed buildings.
<b>12. Economic growth</b>	+	The plan vision is to support research and development in Oxford. A key constraint to employment in Oxford is the lack of affordable housing. As such, the plan focuses on providing housing over new employment land. Job growth is planned to be mostly by building more intensely on existing employment sites. The scale of housing provision supports Oxfordshire's wider economic policies.

### 1.7 Minimising the plan's negative impacts, maximising its positive impacts

The SA/SEA makes suggestions for how to minimise the negative impacts of the Local Plan, maximise its positive impacts, and fine-tune some of the plan wording. The plan team have incorporated some of these suggestions into the plan. For the remaining suggestions, they have explained why the suggestions were not taken on board. Changes made to the plan in response to the SA/SEA suggestions include:

- Specifying what minimum proportion of the area of development sites should be provided for self-build and custom housebuilding;
- Clearer distinction between policies G1 (protection of green infrastructure) and G2 (enhancement and provision of new green infrastructure);
- Clearer links between policies G9 (resilient design) and R1 (net zero buildings);
- Clearer statement requiring bin and bike stores in new development.
- Setting out additional environmental protection measures in specific site allocation policies.

### 1.8 Monitoring the plan's impacts

The social, environmental and economic impacts of the Local Plan will be monitored, so that the plan can be changed if unexpected impacts come to light. Table 1.5 shows the proposed monitoring framework. The impacts of the plan will be monitored every year. The sustainability outcomes will be monitored every three years.

**Table 1.5 Proposed SA/SEA monitoring**

<b>SA/SEA topic</b>	<b>Monitoring of Local Plan 2040 impacts (every year)</b>	<b>Monitoring of sustainability outcomes (every 3 years)</b>
1. Carbon emissions	Contributions secured and proportion of fund spent against climate change offsetting fund	Change in per capita CO2 emissions
2. Climate change resilience	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3
3. Efficient use of land	Applications permitted on protected green space	
4. Local housing need	Net housing completions	Change in population / households
5. Inequalities	Net affordable housing completions	Index of Multiple Deprivation;
		Health dimension of Index of Multiple Deprivation
6. Services and facilities	Applications permitted for new community spaces, cultural venues and visitor attractions	Significant new community assets, cultural venues and visitor attractions
7. Leisure, recreation	Applications permitted on protected green space	
8. Transport and air quality	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford
9. Water	Applications permitted on protected peat reserves	% river length assessed as fairly good or very good for chemical quality and biological quality
10. Biodiversity	Biodiversity net gain being delivered in the city	Area (ha) in areas of biodiversity importance
		Condition of SSSIs, integrity of SACs
11. 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

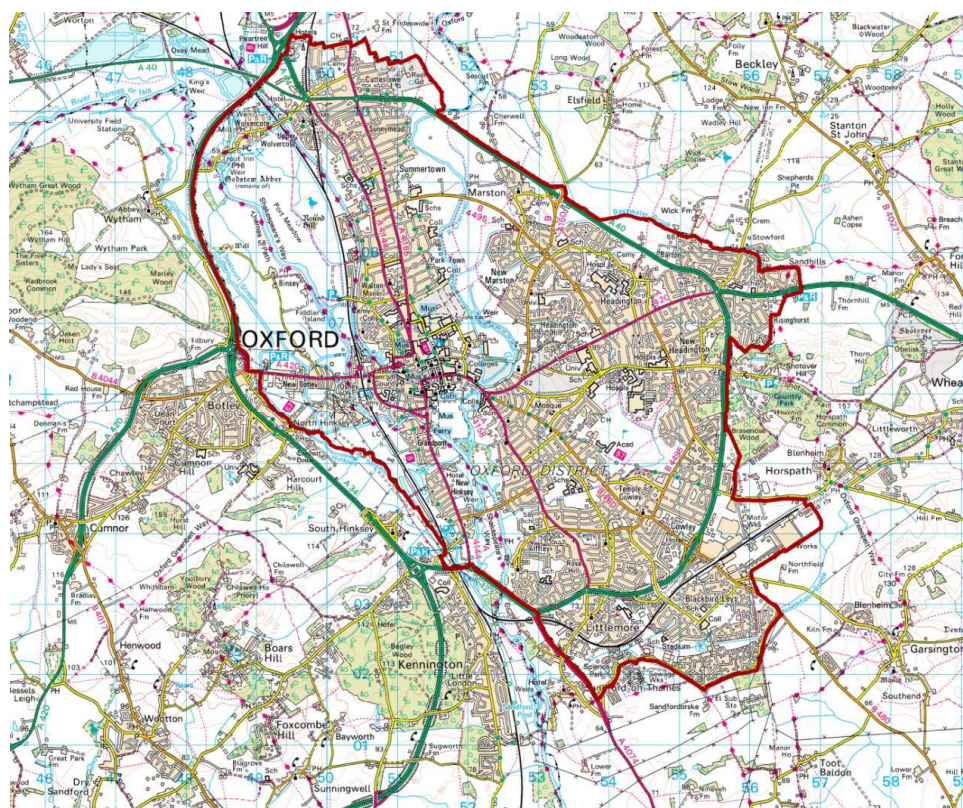
The Regulation 19 Local Plan and this SA/SEA report will be consulted on in Autumn 2023. The Local Plan will be submitted for examination in March 2024, and it is expected to be adopted in summer 2025.

## 2. Introduction

This Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) report accompanies the Regulation 19 consultation on the proposed Oxford Local Plan 2040. This chapter discusses the Oxford Local Plan 2040, SEA and SA, and the structure of the rest of this report.

### 2.1 Background to Oxford City

Oxford City Council is at the heart of Oxfordshire. It has a total area of about 46 km<sup>2</sup> (17.7 miles<sup>2</sup>), with parts of the urban area very densely developed. The built-up area extends to the administrative boundary around much of the eastern side of the city, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre (Figure 1.1).



**Figure 1.1 - Map of Oxford Map © Crown Copyright and database right 2016. Ordnance Survey 100019348.**

Oxford's population is approximately 162,000<sup>1</sup>. One-third of the population is aged between 18 and 29. Oxford is home to 42,000 students, and 5,000 businesses providing 129,000 jobs. There is a high level of in-commuting in the City: more than 40% of the city's workforce lives outside Oxford.

Oxford is a compact city with a unique and world-renowned built heritage. 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, unusually, not only constrains development in the outer cordon of the city, but also through the city's centre. 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 historic city parks and

<sup>1</sup> ONS population estimates 2021: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000178/>

nature conservation areas create pockets and corridors of green within the administrative boundary; several have national and international nature conservation designations, further constraining development.

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

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 in the growth of the region, with high future housing and economic growth.

## 2.2 The Oxford Local Plan 2040

The Oxford Local Plan 2040 carries forward and updates policies set in the Oxford Local Plan 2036. It also allocates sites for housing, employment and other uses such as retail. It provides policies for the management of development in the city, including for the preservation and enhancement of the historic environment, the conservation of nature and biodiversity, urban design, achieving the city’s net zero targets and flood risk management. It will be used in determining planning applications and to guide investment decisions across the city.

The Local Plan 2040 vision is:

“In 2040 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 our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.”

Table 2.1 shows the policies in the Local Plan.

**Table 2.1 Policies in the Local Plan 2040**

Strategy	<b>S1</b>	Spatial Strategy and Presumption in Favour of Sustainable Development
	<b>S2</b>	Design Code and Guidance
	<b>S3</b>	Infrastructure Delivery in New Development
	<b>S4</b>	Plan Viability
Housing	<b>H1</b>	Housing Requirement
	<b>H2</b>	Delivering affordable homes

Housing	H3	Affordable housing contribution from new purpose-built student accommodation	
	H4	Affordable housing contribution from self-contained older persons accommodation	
	H5	Employer-linked affordable housing	
	H6	Mix of dwelling sizes (number of bedrooms)	
	H7	Development involving loss of dwellings	
	H8	Houses in Multiple Occupation	
	H9	Location of new student accommodation	
	H10	Linking new academic facilities with the adequate provision of student accommod.	
	H11	Homes for travelling communities	
	H12	Homes for boat dwellers	
	H13	Older persons and other specialist accommodation	
	H14	Self-build and custom housebuilding	
	H15	Hostels	
	H16	Boarding school accommodation	
	Employment	E1	Employment strategy
		E2	Warehousing and storage uses
E3		Affordable workspace	
E4		Community employment plans	
E5		Tourism and short stay accommodation	
Green city	G1	Protection of the 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	Enhancing onsite biodiversity in Oxford	
	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	
Resources	R1	Net zero buildings in operation	
	R2	Embodied carbon in the construction process	
	R3	Retro-fitting existing buildings	
	R4	Air quality assessments and standards	
	R5	Land contamination	
	R6	Soil quality	
	R7	Amenity and environmental health impacts of development	
Design & heritage	D1	Conservation Areas	
	D2	Listed buildings	
	D3	Registered Parks and Gardens	
	D4	Scheduled Monuments	
	D5	Archaeology	
	D6	Non-designated heritage assets	
	D7	Principles of high-quality design	
	D8	Using context to determine appropriate density	
	D9	Views and building heights	
	D10	Health Impact Assessment	
	D11	Privacy, daylight and sunlight	
	D12	Internal space standards for residential development	
	D13	Outdoor amenity space	
	D14	Accessible and adaptable homes	
	D15	Bin and bike stores and external servicing features	



Liveable city	C1	Town centre uses
	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 venues and visitor attractions
	C6	Transport assessments, travel plans and service and delivery plans
	C7	Bicycle parking design standards
	C8	Motor vehicle parking design standards
	C9	Electric vehicle charging

### 2.3. Strategic environmental assessment (SEA) and Sustainability appraisal (SA)

The European Strategic Environmental Assessment (SEA) Directive requires planning authorities to carry out an environmental assessment as part of the preparation of land-use plans (e.g. Local Plans). SEA predicts and assesses the social, economic and environmental effects of the plan, and of other options considered while the plan was being developed. It aims to ensure that sustainable development is integrated into the plan making process. The Directive was transposed into English law through the Environmental Assessment of Plans and Programmes Regulations 2004 SI No 1633 ('SEA regulations').

Table 2.2 shows the requirements of the SEA Directive and where they are covered in the SA/SEA for the Oxford Local Plan 2040.

Table 2.2 – SEA Directive requirements and where they are covered in the SA/SEA for the Oxford Local Plan 2040	
SEA Directive Requirements	Where covered
a) an outline of the contents, main objectives of the plan or programme... ... and relationship with other plans or programmes	Sec. 2 of this report Sec. 2 of the scoping report, updated at Sec. 3.1 of this report
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	In individual Topic Papers
c) the environmental characteristics of the areas likely to be affected	In separate site appraisal forms, summarised at Table 6.2 of this report
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 Directives 79/409/EEC and 92/43/EEC;	In individual Topic Papers, summarised at Sec. 3.3 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 Topic 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. (Footnote: These	Sec. 4 and 6 of this report

effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	
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;	Sec. 7 of this report
h) An outline of the reasons for selecting the alternatives dealt with...	Sec. 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;	Sec. 2.4 and 2.6 of this report
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Sec. 8 of this report
j) a non-technical summary of the information provided under the above headings.	Sec. 1 of this report
<b>Consultation:</b> 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)	Consultation findings on the Reg. 18 plan's SA/SEA report are summarised at Sec. 3.6 of this report
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).	
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
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b>	Will be carried out after consultation on the Reg. 19 plan and this SA/SEA report
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 after plan adoption
<b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)	

In addition, the Planning and Compulsory Purchase Act 2004 requires all local planning authorities to carry out a sustainability appraisal (SA) of their Local Plans. Sustainability appraisal is an iterative process to assist in the development of a Local Plan. It is used to appraise emerging options against the three elements of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the policies in the Local Plan.

Table 2.3 shows the requirements for SA. This SA/SEA report fulfils the legal requirements for both SA and SEA; where reference is made within this document to sustainability appraisal, it also implies where appropriate strategic environmental assessment.

**Table 2.3 – The Sustainability Appraisal (SA) Process**

<p><i>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</i></p> <p>Task A1: Identify other relevant policies, plans and programmes and sustainability objectives</p> <p>Task A2: Collect baseline information</p> <p>Task A3: Identify key sustainability issues and problems</p> <p>Task A4: Develop the SA framework</p> <p>Task A5: Consult the consultation bodies on the scope of the SA report</p> <p><i>Stage B: Developing and refining alternatives and assessing effects</i></p> <p>Task B1: Test the Local Plan objectives against the SA framework</p> <p>Task B2: Develop the Local Plan options including reasonable alternatives</p> <p>Task B3: Evaluate the likely effects of the Local Plan and alternatives</p> <p>Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects</p> <p>Task B5: Propose measures to monitor significant effects of implementing the Local Plan</p> <p><i>Stage C: Prepare the SA report</i></p> <p><i>Stage D: Seek representations on the SA report from consultations and the public</i></p> <p><i>Stage E: Post adoption reporting and monitoring</i></p> <p>Task E1: Prepare and publish post-adoption statement</p> <p>Task E2: Monitor significant effects of implementing the Local Plan</p> <p>Task E3: Respond to adverse effects</p>
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This SA/SEA has been undertaken by Oxford City Council and Levett-Therivel sustainability consultants. Table 2.4 shows the stages in the development of the Oxford Local Plan 2040 and its SA/SEA.

**Table 2.4 – Stages in development of the Oxford Local Plan 2040 and its SEA**

Plan stage	SA/SEA stage	Date
Early engagement – Issues Consultation <a href="https://www.oxford.gov.uk/downloads/download/1235/oxford_local_plan_2040_-_issues_stage_topic_papers">https://www.oxford.gov.uk/downloads/download/1235/oxford_local_plan_2040_-_issues_stage_topic_papers</a>	SA/SEA scoping report <a href="https://www.oxford.gov.uk/downloads/file/7647/occ_local_plan_2040_-_sustainability_appraisal_scoping_report">https://www.oxford.gov.uk/downloads/file/7647/occ_local_plan_2040_-_sustainability_appraisal_scoping_report</a>	July 2021
Preferred options (Regulation 18) consultation <a href="https://www.oxford.gov.uk/downloads/download/1325/oxford_local_plan_2040_-_preferred_options">https://www.oxford.gov.uk/downloads/download/1325/oxford_local_plan_2040_-_preferred_options</a> <a href="https://www.oxford.gov.uk/downloads/download/1324/oxford_local_plan_2040_-_preferred_options_background_papers">https://www.oxford.gov.uk/downloads/download/1324/oxford_local_plan_2040_-_preferred_options_background_papers</a>	Preferred options SA/SEA report <a href="https://www.oxford.gov.uk/downloads/file/8122/occ_local_plan_-_sustainability_appraisal_of_selected_policy_options">https://www.oxford.gov.uk/downloads/file/8122/occ_local_plan_-_sustainability_appraisal_of_selected_policy_options</a>	September 2022
Pre-submission (Regulation 19) consultation	This report	Autumn 2023
Submission of the Local Plan for examination		March 2024
Expected adoption of Local Plan (subject to timings of examination)		June 2025

## 2.4 Habitat Regulations Assessment and Health Impact Assessment

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.

The City Council has undertaken a Habitat Regulations Assessment, in close consultation with Natural England. Natural England flagged concerns about air quality and had emphasised the need to undertake air quality modelling in their representations at the Regulation 18 consultation.

At the time of writing, preliminary findings from the air quality modelling are showing that the amount of development proposed in Oxford is not of such an order of magnitude as to trigger Natural England's vehicular screening requirements. At this stage, we consider that impacts of development in Oxford 'alone or in-combination' with other plans and programmes, is unlikely to have a significant impact on the integrity of the Oxford Meadows SAC with regard to air quality. Recreational pressure at the meadows has also been assessed and mitigation measures have been suggested through a Stage 2 – Appropriate Assessment. The findings of the HRA will inform this SEA/ SA.

A separate Health Impact Assessment has also been carried out for the Local Plan.

## 2.5 Difficulties in compiling the SA/SEA

No significant difficulties were encountered in compiling the SA/SEA.

## 2.6 Structure of this report

This report was prepared by Oxford City Council with support from Levett-Therivel sustainability consultants. It comprises an update of Stage A of Table 2.3, and Stage B.

Chapter 3 provides an update of Stage A of Table 2.3 (policy context, sustainability context, existing problems, SA/SEA framework)

Chapter 4 appraises the plan vision and objectives

Chapter 5 presents and appraises alternatives to the plan

Chapter 6 appraises the plan policies and sites

Chapter 7 presents mitigation measures to minimise the plan's negative impacts and maximise its positive impacts

Chapter 8 sets a monitoring framework for the plan

Chapter 9 discusses next steps

## 3. Scoping: summary and update

### 3.1 Introduction

Sections 3.2 – 3.4 of this chapter update the SEA/SA scoping report of July 2021 in terms of policy context, sustainability context and existing sustainability problems. Section 3.5 presents the SA/SEA framework used in Chapters 4-6 to appraise the Local Plan.

The 2021 scoping report was made available to statutory consultees (Environment Agency, Natural England, English Heritage) and the public for 6 weeks in July 2021. Section 3.6 discusses the comments received from that consultation, and how they have been taken into account in this report.

The following colour coding system will be used throughout this SA/SEA:

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

### 3.2 Task A1 update: Policy context

Much of the policy context for the Oxford Local Plan 2040 has changed since mid-2021. At a national scale, the **Environment Act 2021** gives government new powers to set binding environmental targets for issues such as air quality, water, biodiversity, and waste reduction. From January 2024 (April 2024 for small sites), it will also require planning applications to deliver at least 10% biodiversity net gain, based on a DEFRA Biodiversity Metric.

The government's **Levelling Up and Regeneration Bill**, which was at the report state in July 2023, would impose far-reaching changes to the planning and SA/SEA processes, including:

- 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.

In June 2022, government dropped its plans for an Oxford – Milton Keynes – Cambridge “**Ox-Cam knowledge arc**”, which would have included an ‘East-West expressway’ and 1 million new homes in the arc. Instead, regional partnerships are expected to take forward any such work. The refresh of **Oxfordshire’s Strategic Economic Plan** is likely to promote levels of population and jobs growth for Oxfordshire that are less challenging, but still significantly higher than natural growth rates.

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.

Work on an **Oxfordshire Plan 2050** (and associated national government funding) stopped in August 2022 as the Oxfordshire authorities were not able to agree an approach to planning for future housing needs in Oxfordshire.

The **Oxfordshire Local Transport Plan 2022** (LTP5) has as targets, by 2040, to deliver a net-zero transport network; replace or remove about half of car trips in Oxfordshire; almost double the number of cycle trips; and halve road fatalities of life-changing injuries.

At the local scale, Oxford has been piloting a small city centre **Zero Emission Zone** since February 2022, and is considering expanding this to much of the city centre. **Low Traffic Neighbourhoods** have been in place in Cowley and East Oxford since 2021. From 2024, pilot **traffic filters** will be located at St. Cross Road, Thames Street, Hythe Bridge Street, St. Clement's Street, Marson Ferry Road and Hollow Way: these would prevent cars but allow public transport, HGVs and mopeds/motorbikes. All of these changes aim to reduce the use of cars; facilitate public transport, walking and cycling; and improve air quality in Oxford.

In December 2022, Oxford City Council approved a £4.65 million package to progress work on re-opening the **Cowley Branch line** to passengers, although no date has been set for the actual re-opening.

### 3.3 Task A2 update: Sustainability context

The [topic papers](#) that accompany the plan and this SA/SEA update the sustainability context:

- [BGP1: Housing need including exceptional circumstances](#)
- [BGP2: Affordable housing \(including first homes\)](#)
- [BGP3: Housing mix](#)
- [BGP4: Houses in multiple occupation \(HMO\)](#)
- [BGP5: Specialist housing need](#)
- [BGP6a: Oxford's economy \(including strategy and employment land supply\)](#)
- [BGP6b: Inclusive Economy](#)
- [BGP7: Green infrastructure including appendix A](#)
- [BGP7: Green infrastructure appendix B](#)
- [BGP8: Biodiversity including Source Pathway Receptor Analysis \(SPRA\)](#)
- [BGP9a: Flood risk and sustainable drainage systems](#)
- [BGP9b: Flood risk and sequential test of sites](#)
- [BGP10: Carbon reduction and net zero carbon development](#)
- [BGP11: Natural resources including air, water, soil/land quality](#)
- [BGP12: Health and wellbeing](#)
- [BGP13: Heritage](#)
- [BGP14: Transport and movement](#)
- [BGP15a: Site assessment process \(urban design and assessment of housing capacity\)](#)
- [BGP15b: Site selection and allocation](#)

Table 3.1 summarises the current situation, and the likely situation if the current Local Plan 2036 continued but no new Local Plan 2040 was prepared.

**Table 3.1 Current situation and likely future without the plan**

SA topic	Current situation	Likely future without plan	Summary findings
<b>1. Carbon emissions</b>	-	-	<p>Per capita carbon emissions in Oxford have dropped by more than 40% since 2005, principally in line with decarbonisation of the national grid. Despite overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. The Local Plan can seek new net zero buildings but has limited powers in other respects, for instance, requiring more energy efficiency measures for existing homes. Greater energy efficiency and renewable energy requirements can also conflict with other priorities, such as providing affordable homes owing to viability issues.</p> <p>Outside of planning, there will be an ongoing need for significant retro-fitting of existing development, and behaviour change. The city's Net Zero Carbon Action Plan identifies the key steps/milestones that need to be met to secure net zero by 2040. The Zero Carbon Oxford Partnership aims to drive this through various initiatives (Local Plan 2040 is one part of the response).</p>
<b>2. Resilience to climate change</b>	--	-	<p>Between 2,000 and 5,000 homes are currently at flood risk. This is likely to increase with climate change. A flood alleviation scheme is proposed for the west side of Oxford. Given constraints on development in Oxford, there could be increased pressure to locate development in areas of higher flood risk. 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. Resilience building will need to be achieved through variety of responses: Local Plan policies are one tool in the longer term, but other actions will also be needed.</p>
<b>3. Efficient use of land</b>	0	0	<p>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 unsuitable locations).</p> <p>Soil quality, development density and protection of undeveloped land have been good to date. The higher costs associated with dealing with any remaining contaminated sites could affect viability and increase pressure to develop greenfield sites.</p>

SA topic	Current situation	Likely future without plan	Summary findings
<b>4. Housing</b> Need and supply	--	--	<p>The housing need figure is identified through the Housing and Economic Needs Assessment, and considered in the context of the Housing and Economic Land Availability Assessment which assesses capacity in Oxford. The housing need in Oxford is for 1,322 new dwellings per year. However, there is not enough capacity within Oxford to meet all of the housing needs to 2040. Some of Oxford's housing needs will need to be met outside the city. Owing to the limited number of sites to deliver large-scale development, 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 proposal. There is also limited opportunity to deliver affordable housing from those developments.</p> <p>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).</p> <p>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, and promoting home ownership models which are still not affordable in the Oxford context.</p> <p>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.</p>
Affordable housing	--	--	
Students and student accommodation	-	0	
<b>5. Inequalities and health</b> Inequality	-	--	<p>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.</p> <p>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.</p> <p>The health of Oxford's residents is generally good, but there is great variation: for instance, men in wealthier parts of the city</p>
General health	+	+	
Health and housing	-	--	



SA topic	Current situation	Likely future without plan	Summary findings
			live more than 13 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Oxford residents' 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.
<b>6. Services, facilities and infrastructure</b> Community facilities	0	0	Availability of services and facilities plays a key role in quality of life. The pandemic and other factors have meant that some community and cultural facilities are closing and others have been supported as people realised the value of these 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.
'Grey' infrastructure	+	+	Wastewater treatment and energy infrastructure are likely to be adequate for the plan period. Transport is covered under 8. (Traffic and air pollution), and water infrastructure is covered under 9. Water.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
<b>7. Green infrastructure and biodiversity</b>	++	0	Oxford has a wide range of green spaces which are generally of good quality. However as Oxford's population increases there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. It is unlikely that new large public open spaces will be created, 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.
<b>8. Traffic and air pollution</b> Air quality	-	0	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. All of Oxford is an Air Quality Management Area for NO <sub>2</sub> , and there are air quality 'hot spots' at many major road junctions. Most of the city centre's air pollution comes from buses. The pandemic lockdown sharply reduced traffic, but traffic levels

SA topic	Current situation	Likely future without plan	Summary findings
Traffic levels and congestion	--	-	<p>have since grown to be greater than pre-pandemic levels. 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.</p> <p>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. The national phasing of petrol/diesel cars and shift to electric vehicles will help to improve air quality.</p>
<b>9. Water</b> Water resources	-	--	<p>Oxford is in an area of serious water stress. Water resources are currently adequate but may not be by 2040. This will be exacerbated with increased demand for water from a growing population. Thames Water is proposing a large new reservoir at Abingdon.</p> <p>Water quality in the Thames catchment is mostly moderate but 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.</p>
Water quality	-	?	
<b>10. Biodiversity</b> Nature conservation areas	- +	0 0	<p>Biodiversity is plummeting worldwide and in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally (irrespective of the Local Plan).</p> <p>Nature conservation areas such as Oxford Meadows SAC are currently relatively well protected, and policies in the Plan protect all green spaces identified as being of high biodiversity value at a local, regional or national level.</p>
<b>11. Urban design and historic environment</b>	++	+	
<b>12. Employment and economy</b> Employment	++	++	<p>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</p>

SA topic	Current situation	Likely future without plan	Summary findings
Unemployment	++	++	economy and a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges. 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.
Education, skills and employability/ training	+	?	Oxford Economic Strategy includes a vision to deliver a more 'inclusive economy.' The city includes 9 areas amongst the most deprived in UK. Oxford's population overall is highly skilled, but 22% of people of working age have low or no qualifications.
Regeneration and economic revival	0	0	This disparity is strongest in the most deprived areas of the city. 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.  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.

### 3.4 Task A3 update: Existing problems

The policy context of Task A1 and sustainability context of Task A2 identified a range of issues and problems that could inform and affect the development of the Oxford Local Plan 2040. Table 3.2 summarises these.

Table 3.2 Sustainability issues and problems for the Oxford Local Plan 2040	
SA objective	Key sustainability issues and problems
1. To achieve the city's ambition to reach net zero carbon	<ul style="list-style-type: none"> <li>• Oxford is still very far away from achieving its 2040 target of net zero emissions and Local Plan cannot deliver it alone.</li> <li>• Retrofitting existing developments will be a significant challenge</li> <li>• New development must not further contribute to climate change</li> <li>• Policy should embed the energy hierarchy into the design of new buildings (fabric first, reducing energy use, mitigating remaining emissions)</li> </ul>

SA objective	Key sustainability issues and problems
emissions by 2040	<ul style="list-style-type: none"> <li>• Embodied carbon is an ongoing challenge to be addressed as part of the construction process</li> <li>• There is potential for supporting larger amounts of renewable energy generation across city through greater uptake of micro-renewables in new development, and for supporting mitigation of emissions from the existing built environment.</li> </ul>
2. To build <b>resilience to climate change</b> , including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	<ul style="list-style-type: none"> <li>• Between 2,000 and 5,000 properties in Oxford are at risk from river flooding, and additional properties are at risk of groundwater, surface water and sewer flooding. The Oxford Flood Alleviation Scheme is expected to reduce this number</li> <li>• The Local Plan 2040 will need to take long term flood risk into account, including the impacts of climate change and how this could change flood risk in the city</li> <li>• New development should not exacerbate flood risk or overheating, such as through hard surfaces increasing surface run off into sewers, or exacerbation of the urban heat island effect.</li> <li>• 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.</li> <li>• There will be residual risks of flooding after applying the sequential approach to locating development and incorporating defence measures.</li> </ul>
3. To encourage the <b>efficient use of land</b> through good design and layout, and minimise the use of greenfield and Green Belt land	<ul style="list-style-type: none"> <li>• The plan must aim to use suitable brownfield sites and other underutilised land as a preferred option for development.</li> <li>• An increase in minimum housing density should be considered where a sufficient level of infrastructure is present.</li> <li>• 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.</li> <li>• 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</li> <li>• The City Council should only release land from the Green Belt or alter the boundary in exceptional circumstances.</li> <li>• The plan should consider a more comprehensive approach to Oxford's Green Belt.</li> </ul>
4. To meet <b>local housing needs</b> by ensuring that everyone has the opportunity to live in a decent affordable home	<ul style="list-style-type: none"> <li>• Housing costs in Oxford are very high, land available for housing is very limited, and affordable housing has historically been difficult to provide.</li> <li>• 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.</li> <li>• A continued reliance on smaller sites is likely to increase pressure on existing infrastructure.</li> <li>• 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.</li> <li>• 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.</li> </ul>

SA objective	Key sustainability issues and problems
	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<p>5. To reduce poverty, social exclusion, and health <b>inequalities</b></p>	<ul style="list-style-type: none"> <li>• Oxford has high levels of health inequalities across the city.</li> <li>• Covid and the cost of living crisis have exacerbated inequalities and harmed health for many.</li> <li>• Oxford’s higher-than-average levels of activity and lower-than-average levels of obesity need to be maintained and improved.</li> <li>• 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.</li> <li>• 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.</li> </ul>
<p>6. To provide accessible essential <b>services and facilities</b></p>	<ul style="list-style-type: none"> <li>• The pandemic has led to the closure of some community and cultural facilities. Post-pandemic there may be changes in the way some services are delivered and facilities are run. Protection of facilities may become more difficult, given changes to government policy on permitted development.</li> <li>• 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.</li> <li>• New infrastructure must address the climate emergency (low carbon, climate resilient). Natural solutions will be important in ensuring the resilience of infrastructure.</li> <li>• Infrastructure needs to help people to live healthy, active lives (e.g. walking/cycling, GP surgeries).</li> <li>• The city generally and its infrastructure should be adaptable to future changes in technology.</li> <li>• 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.</li> </ul>
<p>7. To provide adequate green infrastructure, <b>leisure and recreation</b> opportunities and make these readily accessible for all</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Infill development within the city, particularly on garden land, can provide some green infrastructure and habitat for wildlife.</li> <li>• Increased recreational pressure and water quality impacts (run-off from roads etc.) as a result of new development puts pressure on green infrastructure and biodiversity.</li> </ul>
<p>8. To reduce <b>traffic and associated air pollution</b> by improving travel choice, shortening</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• All of Oxford is an Air Quality Management Area because of NO<sub>x</sub>, which mostly comes from vehicles. Tackling emissions from domestic and non-domestic sources is likely to improve air quality.</li> </ul>

SA objective	Key sustainability issues and problems
journeys and reducing the need to travel by car/ lorry	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Restrictions in car use in the city must be supported via a strong and affordable public transport infrastructure network.</li> <li>• Improvements in renewable 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.</li> <li>• Improvements to cycling and walking infrastructure must be inclusive and the benefits shared by all of Oxford's residents.</li> <li>• Improved public transport connections between the city and surrounding areas will improve the integration of settlements throughout Oxfordshire.</li> </ul>
9. To achieve <b>water</b> quality targets and manage water resources	<ul style="list-style-type: none"> <li>• Oxford is already in an area of serious water stress.</li> <li>• Increased demand for water is likely to put more pressure on water resources. Additional water efficiency measures will need to be investigated at through the plan-making process.</li> <li>• Climate change, particularly incidences of hotter, drier summers may exacerbate water supply issues and create increased water shortages.</li> <li>• Nutrients from wastewater could impact local water bodies, causing eutrophication. 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.</li> </ul>
10. To conserve and enhance Oxford's <b>biodiversity</b>	<ul style="list-style-type: none"> <li>• The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure. Air pollution from increased vehicle movements also impacts other sensitive sites.</li> <li>• Three SSSIs out of the twelve in the city are in unfavourable condition and two are partly in unfavourable condition.</li> <li>• 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.</li> <li>• Climate change is likely to impact habitats and species distribution.</li> <li>• Off-site areas for biodiversity net gain stemming from development will probably be needed in response to the Environment Bill.</li> </ul>
11. To promote <b>good urban design</b> through the protection and enhancement of the <b>historic environment</b> and heritage assets while respecting local character and context and	<ul style="list-style-type: none"> <li>• Potential impacts of new development proposed in the plan on areas of archaeological and historical value should be considered.</li> <li>• 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 does not adversely affect heritage assets, important townscape features and local character.</li> <li>• Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city.</li> <li>• Green spaces and features should be woven into the urban fabric.</li> <li>• Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets.</li> </ul>

SA objective	Key sustainability issues and problems
promoting innovation.	<ul style="list-style-type: none"> <li>• Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.</li> </ul>
12. To achieve sustainable inclusive <b>economic growth</b> , including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/visitor sector	<ul style="list-style-type: none"> <li>• Employment in Oxford is high and likely to continue growing, but is constrained by the availability of appropriate housing. Ensuring the right balance of employment and housing growth is fundamental to ensuring Oxford's growth.</li> <li>• State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages.</li> <li>• Employment growth in Oxford is likely to continue to be in the key sectors of healthcare and STEM, especially those involving R&amp;D. Without appropriate skills &amp; training, those jobs will not be accessible to local people.</li> <li>• Ensuring expanded and robust digital infrastructure is available in as many settings as possible aligns with the expectations of flexibility to work and study anywhere.</li> <li>• Expanded ability to work remotely could provide work and educational opportunities for a wider range of people, overcoming locational constraints and financial/environmental costs associated with travel.</li> <li>• It is unlikely that significant new sites will be identified for employment. The focus will be on redevelopment and renewal of existing sites.</li> <li>• Dramatic changes, accelerated by the pandemic, are likely to the makeup of city and district centres, shifting from retail-dominated to other uses. Employment and education uses may have opportunities to fill in gaps in the form of co-working spaces, R&amp;D spaces and other forms.</li> <li>• 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.</li> </ul>

### 3.5 Task A4: SA/SEA Framework

An SA/SEA Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. Development of the Local Plan 2040 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). 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.

Table 3.3 shows the SA/SEA Framework for the plan objectives, alternatives and policies. Table 3.4 shows the framework for sites. Both are discussed in more detail in the scoping report.

Table 3.3 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 <b>carbon emissions</b> by 2040	<ul style="list-style-type: none"> <li>• Building standards, energy efficiency</li> <li>• Renewable energy</li> <li>• Active travel, public transport</li> <li>• Waste reduction</li> <li>• Sustainable construction practices</li> </ul>	Climatic Factors, Air

SA Objective	Issues covered	SEA Themes
2. To build <b>resilience to climate change</b> , including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	<ul style="list-style-type: none"> <li>• Flooding</li> <li>• Building design and layout</li> <li>• Overheating</li> </ul>	Water, Climatic Factors
3. To encourage the <b>efficient use of land</b> through good design and layout, and minimise the use of greenfield and Green Belt land	<ul style="list-style-type: none"> <li>• Building densities and layout</li> <li>• Greenfield land</li> <li>• Green Belt</li> <li>• Biodiversity generally</li> <li>• Biodiversity designated sites</li> </ul>	Soil, Material Assets, Biodiversity
4. To meet <b>local housing needs</b> by ensuring that everyone has the opportunity to live in a decent affordable home	<ul style="list-style-type: none"> <li>• Housing numbers</li> <li>• Housing size</li> <li>• Affordable housing</li> <li>• Specialist accommodation, e.g. care homes, gypsies/travellers, homeless shelters</li> <li>• Student accommodation</li> </ul>	Material Assets, Population, Human Health
5. To reduce poverty, social exclusion, and health <b>inequalities</b>	<ul style="list-style-type: none"> <li>• Regeneration</li> <li>• Geographical spread of new development</li> <li>• Accessibility of areas of deprivation</li> <li>• Availability of services and infrastructure in areas of deprivation</li> </ul>	Population, Human Health, Material Assets
6. To provide accessible essential <b>services and facilities</b>	<ul style="list-style-type: none"> <li>• Daily needs met within a short walk/cycle ride</li> <li>• Thriving city/local centres</li> <li>• Retail/shops</li> <li>• Community facilities, health care/GP, schools</li> <li>• Facilities for young people, children's play areas</li> <li>• 'Grey' infrastructure: wastewater treatment, transport, energy etc.</li> </ul>	Material Assets, Human Health
7. To provide adequate green and blue infrastructure, <b>leisure and recreation</b> opportunities and make these readily accessible for all	<ul style="list-style-type: none"> <li>• Green and blue infrastructure</li> <li>• Leisure facilities</li> <li>• Playing fields and public open space (for all of the above, distribution/ location as well as sheer quantity)</li> </ul>	Landscape, Biodiversity, Human Health
8. To reduce <b>traffic and associated air pollution</b> by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry	<ul style="list-style-type: none"> <li>• Walking, cycling</li> <li>• Reducing reliance on the private car</li> <li>• Public transport, incl. train station and branch line</li> <li>• Commuting and housing/ jobs balance</li> <li>• Parking</li> <li>• Electric vehicle charging points, zero emission zones,</li> <li>• Air quality and links to transport</li> <li>• AQMA</li> </ul>	Air, Climatic Factors



SA Objective	Issues covered	SEA Themes
9. To achieve <b>water</b> quality targets and manage water resources	<ul style="list-style-type: none"> <li>• Water use</li> <li>• Water quality</li> <li>• SuDS, buffers on streams etc.</li> </ul>	Water, Biodiversity
10. To conserve and enhance Oxford's <b>biodiversity</b>	<ul style="list-style-type: none"> <li>• Habitat Regs Assessment, esp. air quality and recreational disturbance</li> <li>• SSSIs, Local Nature Reserves etc.</li> <li>• Biodiversity more generally (e.g. hedges, un-built up areas)</li> <li>• Biodiversity net gain</li> </ul>	Flora, fauna, biodiversity
11. To promote <b>good urban design</b> through the protection and enhancement of the <b>historic environment</b> and heritage assets while respecting local character and context and promoting innovation.	<ul style="list-style-type: none"> <li>• Listed buildings and archaeology</li> <li>• Setting/curtilage</li> <li>• Conservation areas</li> <li>• Good design, beauty</li> <li>• View cones</li> <li>• High buildings</li> </ul>	Cultural Heritage, Landscape
12. To achieve sustainable inclusive <b>economic growth</b> , including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector	<ul style="list-style-type: none"> <li>• Jobs, incl. knowledge-based jobs</li> <li>• Visitor economy</li> <li>• Locations for start-up ventures</li> <li>• Jobs for local unskilled residents, apprenticeships</li> <li>• Keeping the high street alive amidst changing shopping habits, changes to permitted development etc.</li> <li>• Cultural provision</li> </ul>	Population, Material Assets

**Table 3.4 SA/SEA framework for sites**

<b>SA Objective 1:</b> To achieve the city's ambition to reach net zero <b>carbon emissions</b> by 2040	
<i>See SA Objective 8 for decision-making criteria.</i>	
<b>SA Objective 2:</b> To build <b>resilience to climate change</b> , including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	
<b>Decision-making criteria:</b> Is the use proposed suitable given the flood zone of the site?	
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/ buildings?

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)

**Decision-making criteria:** Will the site be on Green Belt land?

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 significant quantities of net new housing?

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

**Decision-making criteria:** Will it improve the availability of decent affordable housing?

Category	Affordable Housing provision
-	Site is allocated for housing but would provide no affordable housing
0	Site is allocated for use other than housing or is not allocated
+	Site provides up to 50% affordable housing
++	Site provides more than 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?

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?

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.

See also SA Objective 8.

**SA Objective 7:** To provide adequate green and blue infrastructure, **leisure and recreation** opportunities and make these readily accessible for all

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

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?

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

**Decision-making criteria:** Is the site within an Air Quality Management Area?

Category	Air Quality
--	Site is within an Air Quality Management Area (AQMA)
-	Site is adjacent to an 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?

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 it protect and enhance existing flora, fauna and habitats?

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

Category	Archaeology
--	Site contains a nationally important archaeological site (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
-	Site lies on the edge of a conservation area or of a site on the RPG
0	Site is not in or on the edge of a conservation area or site on the RPG

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
<b>Category</b>	
<b>View Cones</b>	
-	Site lies within a view cone
0	Site lies outside of a view cone
<b>Category</b>	
<b>High Buildings Area</b>	
-	Site lies within the City Council's locally designated high buildings area.
0	Site lies outside the City Council's locally designated high buildings area.
<p><b>SA Objective 12:</b> To achieve sustainable inclusive <b>economic growth</b>, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector</p> <p><b>Decision-making criteria:</b> Will it support key sectors that drive economic growth?</p> <p>Will it increase the quantity and quality of employment opportunities?</p>	
<b>Category</b>	
<b>Employment Opportunities</b>	
0	Do not allocate/ allocate for employment use
++	Allocate site for employment use

### 3.6 Task A5: Consulting on the SA/SEA

The Preferred Options Consultation Report of May 2023 reviews comments made on the Regulation 18 Local Plan and its SA/SEA. Table 3.1 summarises the consultation findings that relate to the SA/SEA, and explains how they have informed this SA/SEA report.

**Table 3.1 Consultation comments on the Reg. 18 SA/SEA consultation**

Reg. 18 consultation comment on the SA/SEA	Response to comment
SA does not appropriately consider the climate emergency/ ecological emergency and the impacts of continually growing population. SA does not address climate adaptation (as a distinct need from mitigation) enough. Consultee highlights work from EA which the Oxford work needs to dovetail with; also their own adaptation work which has previously been submitted to council.	<p>The two first SA/SEA objectives relate to climate change mitigation and adaptation, and SA/SEA objective 7 relates to biodiversity. Sec. 6.4 of this report discusses the Local Plan's overall impacts on climate and biodiversity.</p> <p>The Council recognises the important role of climate change adaptation and has set out a number of policy options under chapter 4 of the Preferred Options document which were intended to cumulatively address this issue within the limits of the Local Plan's influence. This was supported by a climate risk background paper which we included as part of the consultation. We have developed these options into a set of policies in the Regulation 19 consultation which address the various climate risks the city faces – from flooding to overheating. We have prepared these policies with reference to a range of resources and strategies both</p>

Reg. 18 consultation comment on the SA/SEA	Response to comment
	national as well as local including emerging climate risk assessment work being undertaken by the county council.
Economic growth does not seem to fully consider potential growth in remote working, nor does LP encourage it enough.	The demand for employment space has remained high despite increased hybrid and home working for office-based workers because of demand from the R&D market (particularly smaller offices and conference settings).
Concern that findings/data is not current or reflective of immediate issues; a lot of work is borrowed from the last Local Plan with updating. Concern about errors with site descriptions in SA, unclear on weight given to it at this stage.	The material prepared as part of the Regulation 18 consultation was supported by the most up-to-date data that could be accessed at the time, including where necessary (and where it was deemed still of relevance) work from the last Local Plan. The preparation of supporting evidence including updated studies on various topics is an iterative process and resource intensive process and has been ongoing over last couple of years and these will be referenced in the Regulation 19 consultation. Where errors have been identified, we have made best efforts to ensure these are corrected for the Regulation 19 consultation.
Feels there should be a separate consultation on the SA and its scoring before any further progress on Local Plan.	There have already been two consultations on the SA scoring: at the scoping and the Regulation 18 process.
SA brings into question the sustainability of the preferred options and indicates need for significant change	The purpose of the SA process is to identify the sustainability of different alternatives, to inform subsequent plan-making. Some alternatives that are not the most sustainable locally may be more sustainable or preferred overall: for instance high density development in Oxford may be more sustainable than the same number of dwellings being built at lower density outside Oxford.
Overconcentration on home rather than accommodation, Oxford has an unusual population mix consisting of key workers and students, most of whom will want rooms/small flats not large homes. Also overconcentration on providing space inefficient family homes which impacts ability to deliver medium/high density accommodation.	Policy H6 requires, for affordable accommodation, that 30-35% are 1 bedroom homes, and 25-35% are 2 bedroom homes. Policies H8-H15 focus on providing specialist accommodation for people who need temporary accommodation, students and boarding school pupils, Gypsies and Travellers, boat dwellers, and older people.
Disagreement with analysis/scoring of alternative S2b in objectives 7, 9, 10, 11, 12. Feels S2b should score better than other, e.g. adequate blue/green leisure - S2b is clearly better for leisure. Losing green-space brings more population in (increasing demand) and reduces greenspace so increases demand and reduces supply. Under SA	Minor adjustments were made to the scoring of objectives 10 and 11 to clarify that S2b would have more negative impacts on biodiversity and the landscape than S2a. Objectives 7 and 9 on recreation and water already show this. For Objective 12, S2b would restrict economic growth more than S2a so the scores have remained unchanged.

Reg. 18 consultation comment on the SA/SEA	Response to comment
objective 12, an unhealthy, overcrowded and undesirable city will not support economic growth.	
For SA objective 7, Natural England suggest the use of the biodiversity net gain metric 3.1 and Environmental Benefits from Nature Tool at this stage of plan making in order to establish a baseline position and inform the SA evidence base.	The Council has not used these tools specifically to establish a baseline, however, the site allocations in the Local Plan have been prepared in liaison with expertise from the Council's Environmental Sustainability team and other officers, including Ecology, Air Quality, Flooding, Land contamination and tree officers in order to help inform the wording of the policies. More broadly, we have used a range of environmental information to inform the Local Plan approach, including an updated Green Infrastructure study, Strategic flood Risk Assessment, reference to the emerging Oxfordshire Nature Recovery Network and other data sources as referenced in the individual background papers.
The following types of plans relating to the natural environment should be considered where applicable to plan area: green infrastructure strategies, Biodiversity plans, Rights of Way Improvement Plans, River Basin Management Plans, Relevant landscape plans and strategies.	Where relevant, these types of plans have been used to inform the Local Plan and are referenced in the associated background papers and evidence base

## 4. Assessing the Local Plan vision and themes

The July 2021 issues consultation proposed a draft vision and objectives. These have since changed, with the plan objectives having been replaced by six themes. The vision has also been changed to emphasise Oxford's global role in research and development in the life sciences and health sectors. Table 4.1 shows the appraisal of the vision and themes of the Regulation 19 Local Plan, using the SA/SEA framework of Table 3.3.

**Table 4.1 SA/SEA appraisal of the Local Plan vision and themes**

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
<b>Vision:</b> (see Sec. 2.2)	++	++	+	0	++	0	+	0	+	+	+	++
<b>Themes</b>												
Oxford will be a healthy and inclusive city to live in	0	0	0	++	+	+	0	+	0	-	0	0
Oxford will be a prosperous city with a globally important role in learning, knowledge and innovation	-?	0	0	0	+	?	0	-	-?	-?	0	++
Oxford will be a green and biodiverse city that is resilient to climate change	+	+	0	0	0	0	+	0	+	++	0	0
Oxford will be a city that utilizes its resources with care, protects the air, water and soil and aims for net zero carbon	+	+	+	0	0	+	0	0	+	+	0	0
Oxford will be a city that respects its heritage and fosters design of the highest quality	0	0	0	-?	0	0	0	0	0	0	++	+-
Oxford will be a liveable city with strong communities and opportunities for all	+-	0	+	0	+	++	0	+	0	0	0	0



## 5. Assessing the Local Plan alternatives

The Preferred Options SA/SEA report of September 2022 explains how the plan alternatives were identified, and provides the detailed appraisal of the policies. This chapter summarises the findings of that report.

All of the policies in the Regulation 18 draft plan were reviewed. Where there was only one uncontroversial approach to the policy; where all the alternatives would have similar sustainability impacts; or where alternatives were unlikely to have significant sustainability impacts, no alternatives were considered. Alternatives were available for the following policies:

1. Approach to greenfield sites
2. Housing requirement for the plan period / H2. Housing need for the plan period
3. Employer linked affordable housing
4. Houses in Multiple Occupation
5. Employment strategy / Allowing housing on existing employment sites
6. Location of new employment uses
7. Delivering mandatory net gains in biodiversity in Oxford
8. Retrofitting existing buildings including heritage assets
9. Motor vehicle parking design standard
10. Focusing town centre uses in district centres

For each of these policies, alternatives were appraised using the SA/SEA framework of Table 3.3, and an explanation is provided for why the preferred alternative was chosen. Section 5.11 describes the site selection process for development sites in the Local Plan.

### 5.1 Approach to greenfield sites

The alternatives considered were:

S2a. Assess all greenfield sites and set out reasons for their protection. Direct development away from protected greenfield sites. However, do not have a blanket protection of all greenfield sites. Do include policies to maximise efficient use of land on brownfield sites. This will include a review of Green Belt to assess whether there are any sites in the Green Belt that could come forward, that are not biodiversity sites or flood storage and would not have an unacceptable impact on the integrity of the remaining Green Belt.

S2b. Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites.

SA Objective	S2a	S2b
1. Climate change	0	-?
2. Carbon change resilience	0	0
3. Efficient use of land	+/-	+
4. Local housing needs	-	-
5. Inequalities	0	0
6. Services and facilities	0	0
7. Leisure, recreation	-	-?
8. Traffic and air pollution	?	
9. Water	-	-?
10. Biodiversity	-	-?
11. Design, heritage	-	-?
12. Economic growth	+	?

S2a is preferred because it is considered to be the best balance between competing sustainability objectives. It protects the greenfield sites with the greatest benefits for the environment. However, it also recognises that greenfield sites in Oxford are likely to have sustainability benefits for housing and other developments compared to many sites further away from the city, because people are able to walk, cycle and use public transport easily. There is a great need for housing and other developments for social and economic reasons.

## 5.2 Housing requirement and need for the plan period

The alternatives considered were:

H1a. Set a capacity-based / constraint-based housing requirement (estimated at c7,852 dwellings 2020-2040 at the options stage, now confirmed to be 9,612)

H1b. Set a housing requirement in the Plan based on the identified housing need / H2a. Define housing need based on the Standard Method calculation of need. (approx. 14,580 dwellings 2020-2040)

H2b. Set a housing requirement based on achievement and support of economic growth, i.e. plan housing to support the forecast increase in workers. Set affordability-based target i.e., seek to meet full affordable housing need.

(This appraisal assumes that the economic growth led housing requirement is significantly greater than the need based on the Standard Method)

SA Objective	H1a	H1b / H2a	H2b
1. Climate change	0?	-	--
2. Carbon change resilience	-	-/--	--
3. Efficient use of land	?		
4. Local housing needs	-	+	++
5. Inequalities	-	-	+
6. Services and facilities	0?	+/-	+/--
7. Leisure, recreation	-	-/--	--
8. Traffic and air pollution	-	-/--	--
9. Water	-	-/--	--
10. Biodiversity	0?	-	--
11. Design, heritage	?		
12. Economic growth	0	+	++

H1a is preferred. The Government sets the Housing Delivery Test, whereby local planning authorities must show that they are delivering the number of houses in their housing requirement. Local authorities also need to show a 5-year supply of land for housing. If these test are not met, the policies in the Plan have less weight. Setting a requirement above assessed capacity risks unsuitable sites being developed, with potential sustainability impacts. Need is assessed differently, with co-operation with neighbouring authorities to try to get the unmet need met outside of but close to the city.

## 5.3 Employer linked affordable housing

The alternatives considered were:

H5a. On specified sites which would be listed in the Plan allow schemes that are available for employees who work for a specific organisation at a rent level affordable to them (as agreed with the local authority. Partial rent forms such as shared ownership may be possible if part remains in the ownership of the employer. Those on student placements may be considered employees).

H5b. Do not consider an employer linked housing policy.

SA Objective	H5a	H5b
1. Climate change	+?	0
2. Carbon change resilience	0	0
3. Efficient use of land	?	0
4. Local housing needs	+	0
5. Inequalities	?	0
6. Services and facilities	0	0
7. Leisure, recreation	0	0
8. Traffic and air pollution	+	0
9. Water	0	0
10. Biodiversity	+/-	0
11. Design, heritage	?	0
12. Economic growth	+	0

Including an employer-linked policy (H5a) is preferred. It enables housing to come forward on sites that wouldn't otherwise be suitable for general market and affordable housing, and it is restricted to these types of sites. It enables employers to provide accommodation for their staff, at affordable levels. This will help support the economy and services in the city, such as the hospitals, also reducing commuting distances for some of the staff. The housing would be affordable to the staff, so it has social benefits also.

#### 5.4 Houses in Multiple Occupation

The alternatives considered were:

H8a. Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage (currently this is 20%).

H8b. Allow new purpose-built HMOs in appropriate locations.

H8c. Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.

H8d. Do not have any restriction on HMOs.

SA Objective	H8a	H8b	H8c	H8d
1. Climate change	n/a			
2. Carbon change resilience	n/a	+	n/a	n/a
3. Efficient use of land	+			
4. Local housing needs	-/+	+	-	+/-
5. Inequalities	+	+	-	-
6. Services and facilities	n/a			
7. Leisure, recreation	n/a			
8. Traffic and air pollution	+			
9. Water	n/a			
10. Biodiversity	0			
11. Design, heritage	0	?	-	-
12. Economic growth	0	0	0	+

The preferred alternative combined options H8a and H8b to form the policy. This combination of options scored well against most of the sustainability objectives. The combination is preferred because this approach has over time helped to manage the impact of HMOs. It does not prevent

them, but recognises they are an important housing type. However, it also recognises that over-concentration of them may have negative impacts. Focussing HMOs in certain areas only means they may not be available where people want them, and those areas could have more significant impacts. No restriction means that these potential impacts on the local community could be widespread.

## 5.5 Employment strategy / Allowing housing on employment sites

The alternatives considered were:

E1a./E3a. 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. This would mean making the best use of the city and district centres and existing prime employment sites, primarily through the delivery of continued employment uses at these locations. It could also mean allowing an element of housing to come forward on employment sites. (See options on “enabling housing on existing employment sites”; “making best use of employment sites”; and “location of new employment uses”, below.); Allow an element of housing delivery on existing employment sites (if other policy requirements, for example around flood risk, are met).

E1b./ E3b. Allow growth of employment-generating uses throughout the city, including on sites not already in that use and outside of the city and district centres, to try to meet all forecast need within the city; Maintain employment sites for employment or commercial uses. Do not further diversify uses to include housing as well.

E1c. Focus on Oxford providing a broad employment base, trying to protect a wide range of employment-generating uses including those that don’t make efficient use of land. This would include protection of warehouse sites and small light-industrial sites, for example, as well as key sites such as the MINI plant and Science Area.

SA Objective	E1a / E3a	E1b / E3b	E1c
1. Climate change	0	--?	?
2. Carbon change resilience	+	-	?
3. Efficient use of land	+	0	-
4. Local housing needs	+	-	+/-
5. Inequalities	+/-	-?	+
6. Services and facilities	?	?	?
7. Leisure, recreation	n/a		
8. Traffic and air pollution	++	--	?
9. Water	0	-	-?
10. Biodiversity	0	--	-?
11. Design, heritage	n/a		
12. Economic growth	-	++/+	+

See text under option 5.6 for full explanation of how preferred alternative was derived.

## 5.6 Location of new employment uses

The alternatives considered were:

E4a. Support new employment uses through intensification and modernisation of existing sites, including hospitals and universities, other Category 1 and 2 employment sites (E.g., supporting office and R&D in Oxford’s West End and recognising innovation clusters such as the Business Park, Science Park Oxford North and Old Road Campus), together with the City and District Centres (subject to the role and function of each respective centre).

E4b. Do not allow any new employment-generating uses outside of existing sites (i.e., do not allow loss of existing housing sites outside of city and district centres to employment-generating uses).

E4c. As well as intensification on existing sites and in the city centre and district centres, allow new employment uses in a very few locations specified as suitable, which would be only adjacent to existing sites, potentially requiring this expansion to be part of mixed-use schemes only.

E4d. Rely solely on national policy and other policies within the plan (e.g., hierarchy of centres) to determine proposals for new employment floorspace in the city.

The appraisal assumed that E4b would allow no new employment sites; E4d would allow new uses in district/city centres plus edge of town; E4c would allow some existing employment sites to expand, potentially into housing or greenfield land; E4a would be similar to E4d but with a greater focus on themed employment clusters.

SA Objective	E4a	E4b	E4c	E4d
1. Climate change	0			
2. Carbon change resilience	+	0	+	?
3. Efficient use of land	-	0	+	?
4. Local housing needs	-	0	-	-
5. Inequalities	-	0	+/-	-
6. Services and facilities	n/a			
7. Leisure, recreation	0	0	-	0
8. Traffic and air pollution	-/--	0	-/--	-
9. Water	0			
10. Biodiversity	-	0	-/--	-
11. Design, heritage	?			
12. Economic growth	++	0	+	+

The preferred alternative for the employment strategy (policy E1) combines aspects of options E4a, E4c and E4d. The two appraisal tables set out above (Table 5.5 and 5.6) show the sustainability benefits of combining options E1a/ E3a from Table 5.5 with options E4a and E4b from Table 5.6. Option E1a provides a clear ambition to meet Oxford's employment need on land within the city. Option E4a supports the intensification and modernisation of existing employment sites in the city and Option E4b provides a clear steer that new sites coming forward outside existing employment sites and the city and district centres should be resisted. Finally, E3a suggests that an element of housing could be suitable on the city's employment sites.

The Employment Land Needs Assessment shows that there is sufficient employment land available within the plan period across existing employment sites to meet the city's employment needs. This means that there would be no additional unmet employment need as a result of this approach. Allowing an element of housing on employment sites subject to certain specified criteria means that there are likely to be positive sustainability benefits for meeting local housing needs. Not allocating new employment sites in the city enables the existing clusters to intensify. Allowing an element of housing on the employment sites provides an opportunity to diversify single use areas to incorporate an element of housing where landowners are supportive of this approach.

## 5.7 Delivering mandatory net gains in biodiversity in Oxford

The alternatives considered were:

G4a. Set out a hierarchy for how 10% net gain as required through Environment Act should be delivered, particularly where on-site net gain is not possible. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery within Oxfordshire, if no opportunities are available in the city, would be sought within the opportunity areas of the forthcoming Local Nature Recovery Strategy, and the Oxfordshire Nature Recovery Network. Payment to a body managing schemes would be the final option in the hierarchy

G4b. Require higher than 10% net gain on certain sites, in excess of the minimum requirements of the Environment Act.

G4c. Do not include a policy addressing biodiversity net gain requirements as set out in Environment Act, defer to national guidance/policy.

National policy already recommends a hierarchical approach to delivering biodiversity net gain, with on site being preferable, near the site next best and so on, and purchasing national level statutory biodiversity credits from government as a last resort. G4a however proposed to set out more locally specific criteria for guiding any offsite delivery (tying this to areas of land identified as most suitable for ecological enhancement as set out in the Nature Recovery Network). For this reason, G4a and G4c were appraised together.

SA Objective	G4a/ G4c	G4b
1. Climate change		+
2. Carbon change resilience		n/a
3. Efficient use of land	-?	-?
4. Local housing needs	-?	-
5. Inequalities		n/a
6. Services and facilities		n/a
7. Leisure, recreation	0/+	+
8. Traffic and air pollution		n/a
9. Water	+	+
10. Biodiversity	0	+
11. Design, heritage		n/a
12. Economic growth	0	0/-?

The preferred alternative is to set out a local hierarchy for where net gain should be delivered in line with option G4a, although this has been slightly modified following further analysis of where opportunities for net gain delivery are likely to be within the city. The policy sets out that net gain should be provided onsite, or where unfeasible, within an area identified in the Nature Recovery Network, (preferably within the city in the first instance). The areas within the Nature Recovery Network have been identified as having the most potential benefit for enhancement for biodiversity so are the preferable locations for offsite delivery in the first instance, preferably as local to the site as possible.

Setting a target beyond 10% net gain was considered unlikely to be deliverable for many development sites in the city due to the various constraints on the sites and the Environment Act's very specific requirements for how net gain needs to be delivered. A higher policy target would ultimately result in greater proportions of offsetting payments being secured for delivery in other locations rather than onsite: this is explored further in the background paper on Green Infrastructure and Biodiversity. Instead, the Local Plan maintains a consistent 10% target in line with

the national requirements but encourages higher delivery where possible. However, because onsite delivery of ecological enhancements is considered an important objective for the Local Plan, policy G5 (enhancing onsite biodiversity) and policy G3 (urban greening factor) provide a robust framework for securing a range of greening and biodiversity measures onsite that go beyond habitat creation: they have been designed in a way that can work more flexibly for the various constraints on sites specific to Oxford. This more bespoke approach is considered to be in keeping with the spirit of going beyond the minimum required nationally as was proposed in the alternative option G4b and should secure more direct onsite delivery of features to support nature throughout the city.

## 5.8 Retrofitting existing buildings including heritage assets

The alternatives considered were:

R3a. 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.

R3b. 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 benefits that may outweigh harm. Be explicit in setting out a set of key principles to follow, potentially flagging which measures 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.

R3c. Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

SA Objective	R3a	R3b	R3c
1. Climate change	+	+	0
2. Carbon change resilience	+	+	0
3. Efficient use of land	n/a		
4. Local housing needs	+	+	0
5. Inequalities	n/a		
6. Services and facilities	n/a		
7. Leisure, recreation	n/a		
8. Traffic and air pollution	n/a		
9. Water	n/a		
10. Biodiversity	n/a		
11. Design, heritage	0	0	0
12. Economic growth	n/a		

The preferred alternative is a combination of options R3a and R3b as is set out in policy R3. This approach recognises that the Council needs to encourage retro-fit of existing buildings wherever possible and clearly sets out that the starting point will be to support this. It also recognises that Oxford has a significant proportion of traditional buildings which require a more nuanced set of considerations to be factored into design of retro-fit, and requires applicants to ensure these are factored into their proposals in order to minimise harm to these assets.

In this way, the policy tries to provide more clarity to help applicants plan for retro-fit of traditional buildings so that these are retro-fitted in the right way for these types of buildings. This should ensure that climate change benefits can be delivered without coming at the expense of the buildings' special features and qualities, which make an equally important contribution to the sustainability of the city in terms of heritage and the various benefits these provide.

## 5.9 Motor vehicle parking design standard

The alternatives considered were:

DH7a. Seek car free residential development across the city, subject to criteria to ensure accessibility to public transport and local shops, and low car in locations not suitable for car free. Car free would mean no spaces allocated to a house, but parking would be available to meet disabled and operational needs, for car clubs and potentially for those who can demonstrate a need for a personal vehicle for work that needs to be parked near home (potentially in a designated area within the site) (work vans, health visitors for example). The policy will consider setting a threshold for different levels of car free, because the larger strategic sites (over 50 units) have more scope for successful carpooling and more space for essential vehicles. The policy will set design guidance to ensure the parking provision makes the most efficient use of land, is landscaped, and allows for car free street design. The approach to car free development would be assessed against whole plan viability as set out in Strategic Policy Option S4.

DH7b. Do not allow any additional parking on non-residential sites which are proposed for redevelopment. Seek a significant reduction where there is good accessibility to a range of facilities.

DH7c. Require all new development to be car free across the city.

DH7d. Adopt low car but not car free parking standards. These could still vary by accessibility of the area of the city. These could be the same level of parking standards as for the rest of Oxfordshire, or potentially reduced from this but not car free, for example 1 car per 2 homes and additional parking for new non-residential developments.

The appraisal assumed that DH7c is the most restrictive as it applies to employment as well as residential parking; DH7a is next most restrictive; DH7b would be closest to the current situation; and DH7d would be less restrictive than the current situation.

SA Objective	DH7a	DH7b	DH7c	DH7d
1. Climate change	0			
2. Carbon change resilience	+	0	++	-
3. Efficient use of land	+	0	++	-
4. Local housing needs	+/-	0	++/--	0
5. Inequalities	+/-	0	++/--	+/-
6. Services and facilities	n/a			
7. Leisure, recreation	n/a			
8. Traffic and air pollution	+	0	++	0
9. Water	?			
10. Biodiversity	?			
11. Design, heritage	n/a			
12. Economic growth	-?	0	--	0

The preferred alternative is a combination of options DH7a, DH7b and DH7d, and is set out in Policy C8. This policy seeks to reduce parking in new development and supports low car developments. Maximum car parking standards would not be required for the development but there would only be dedicated parking spaces for service and delivery vehicles, blue badge holders, car clubs and visitors. Oxford is a compact city where land is scarce so the amount of land given over to parking should be limited. However, Policy C8 recognises that it is not realistic or practical to make developments low car if they are not well served by public transport, local shops and within a Controlled Parking Zone: in these instances the parking standards set out in the Plan's appendices would be applied.



For non residential development the intention is to seek a downward pressure on parking, and the level of parking on the site will be determined in the light of the submitted transport assessment or travel plan which will encourage a shift towards sustainable modes of travel.

## 5.10 Focusing town centre uses in district centres

The alternatives considered were:

C1a. Define the district centres as on the map above as areas that are highly accessible and include a broad range of facilities including shops, hospitality, community and leisure facilities. These include: City centre, Blackbird Leys, Cowley Centre, Cowley Road, Summertown, Headington. Identify the character of each area, strengths and weaknesses, and provide design guidance to ensure new developments enhance the character and attractiveness of these areas to encourage people to visit and linger and a sense of belonging. Allow new Use Class E uses in the district centres, including: Retail, cafes and restaurants; Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres); Health centres, GPs and clinics; Offices. Also allow: Community facilities (see options below), residential including student accommodation (where compliant with any policy on active frontages); Visitor attractions, Hotels, Flexible work-spaces, co-working spaces and live-work units.

C1b. Define local centres to include those on the map above, to ensure protection of facilities within 15 minutes' walk, which are: St Clement's, Walton Street and Little Clarendon Street, High Street east, Rose Hill, and Underhill Circus (not previously designated as a local centre). Allow new Use Class E uses in local centres, including: shops, cafes and restaurants; Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres); Health centres, GPs and clinics; Offices; Encourage flexible work-spaces, co-working spaces and live-work units. Do not allow student accommodation, hotels or visitor attractions (Sui Generis uses including cinemas, concert halls, dance halls).

C1c. Include a policy that sets out a sequential approach for locating new town centre uses based on: centres (city, district and local) first, then edge of centres and only out-of-centre locations where no alternative sites are available. Applicants would be required to demonstrate how they have applied the sequential approach if they are proposing town centre uses outside the centres, looking at edge of centre first. Include criteria that will be used to assess applications for town centre uses outside of the existing centres, including accessibility by public transport, that negative impacts on the road network can be mitigated, that there is no harm to adjoining land uses. Require an impact assessment for retail and leisure proposals outside of centres (currently required for those of 350m<sup>2</sup> 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 transport.

C1d. Do not include a policy that sets a sequential approach requirement or criteria for town centre use proposals outside of centres.

SA Objective	C1a	C1b	C1c	C1d
1. Climate change	n/a			
2. Carbon change resilience	+	+	+	0
3. Efficient use of land	+	+	+	0
4. Local housing needs	n/a			
5. Inequalities	0			
6. Services and facilities	++	++	+	0
7. Leisure, recreation	n/a			
8. Traffic and air pollution	++	++	+	0

9. Water	n/a			
10. Biodiversity	n/a			
11. Design, heritage	n/a			
12. Economic growth	+	+?	+	0

The preferred alternative is a combination of options C1a, C1b and C1c as set out in Policy C1. This policy sets out the hierarchy of centres and ensure that town centre uses are directed to the city centre, district and local centres. The city and district centres are very accessible and include a broad range of facilities including shops, offices, community and leisure facilities. Their role in creating liveable neighbourhoods is very important in ensuring that local residents can access a wider range of facilities by walking. Local centres are suitable for Class E uses (shops, offices, cafes etc.) and local community facilities, but not student accommodation or hotels. Small parades of shops serving a very local function are not considered as local centres (NPPF definition), although they are locally significant and help to create liveable cities.

### 5.11 Site selection process

The Local Plan 2040 includes 50 site allocations. The site audit, [https://www.oxford.gov.uk/downloads/file/5563/bgp20\\_-\\_sites\\_audit](https://www.oxford.gov.uk/downloads/file/5563/bgp20_-_sites_audit), gives information about how these sites were appraised and chosen.

At the Preferred Options stage 471 sites across Oxford were identified. These were identified from a range of sources, including previously allocated sites; West End AAP identified sites; other sites from the Strategic Housing Land Availability Assessment; calls for sites inviting landowners to nominate their sites; employment sites of greater than 0.25 ha; stakeholder consultation etc. A three stage process was then followed to identify which of these potential sites should be included as proposed site allocation policies in the Local Plan.

**Stage 1:** Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. All sites underwent a Stage 1 filter process. Sites were rejected for allocation for development at Stage 1 only if 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;
- Already at an advanced stage in the planning process (i.e. development has commenced).

**Stage 2:** Assessment against the SA/SEA objectives. All sites that had passed the Stage 1 filter process were considered against the SA/SEA objectives of Table 3.4. Sites were scored accordingly, however sites were only rejected for allocation for development at Stage 2 if they:

- Were considered to be part of Oxford's Green Infrastructure network as determined in the Green Infrastructure Study;
- Had no clear access.

**Stage 3:** Assessment against the Local Plan Preferred Options Strategy and deliverability considerations. All sites that had passed the Stage 2 assessment were considered at Stage 3. Sites were rejected for allocation for development at Stage 3 only if:

- 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.

In total, 387 sites were rejected at Stage 1, 2 or 3. The remaining 84 sites were all taken forward and subjected to further detailed assessment. This assessment considered:

- Detailed assessment of each individual site including SA/SEA;
- Protecting sites for employment uses (Category 1, 2 and 3 sites);
- Protecting sites that are identified as part of the Green Infrastructure Network.
- Protecting the Special Areas of Conservation (SACs), Special Areas of Scientific Interest (SSSI), Local Nature Reserves, Local Wildlife Sites, Wildlife Corridors and other sites with biodiversity interest (those with protected species);
- Protecting playing pitches and allotments – unless criteria can be met such as replacement facilities provided nearby or improvements to nearby facilities or demonstration they are surplus to requirements;
- Protecting pubs;
- Protecting community facilities, allowing loss under certain circumstances, such as replacement nearby; or improvement to nearby facilities; or demonstration they are surplus to requirements; or that opportunities have been explored for multi-use;
- Protecting existing state primary and secondary school sites and supporting extensions and more extensive uses on site;
- Identifying sites where employer linked housing could be provided; and
- Likely deliverability of the site.

Of the 84 sites included at the preferred options stage, 50 have been allocated. Some of the other sites have been merged. Others were not allocated because of issues such as limited site capacity, the site being within an Area of Focus<sup>2</sup>, planning permission already having been granted, or landowners no longer being interested in developing their sites: Table 5.1 provides further information. Table 6.2 lists the 50 allocated sites and shows their sustainability impacts.

**Table 5.1 Preferred Options sites that have not been taken forward, and reasons for this**

Preferred Options Sites	Reason not taken forward
<b>Central and West Area</b>	
Science Area and Keble Road Triangle 062	Academic and research uses only. Within North of City Area of Focus. No need for allocation
Radcliffe Observatory Quarter (ROQ) 579	Academic and research uses only. Within North of City Area of Focus. No need for allocation
Oxford University Press, Walton Street - Cat 1 Employment Site	Category 1 employment site. No site allocation
Oxford Railway Station 075	Covered by West End Area of Focus
Worcester Street Car Park 081	Combined with 070 and 624 to form Nuffield Sites
Oxford Centre for Innovation 448	Category 1 employment site. No site allocation.
Units 1 and 2, 135-137 Botley Road 607a	Employment only. Within West End Area of Focus.
Faculty of Music 021	Uncertain whether site will be available in plan period (HELAA Appendix A)
Oriel College Land at King Edward St and High St 044	No confirmed interest from landowner to develop within plan period (HELAA Appendix A)

<sup>2</sup> An area of focus sets out design principles and infrastructure commitments over a wider area providing relative certainty for development proposals within that area – as such, site allocations are not needed in these areas for certain uses/quantum of development

<b>Preferred Options Sites</b>	<b>Reason not taken forward</b>
Sites adjacent to the east of Osney Bridge to the north and south of Botley Road 613	No need for allocation given proposed use
Site to the south of Cripsey Place 614	Capacity less than 10 (HELAA Appendix C)
Osney Warehouse and St Thomas School 616	Capacity less than 10 (HELAA Appendix C)
St Stephen's House, Norham Gardens 609	Current use is student accommodation. Landowner wishes to intensify use. No need for allocation as existing student accommodation.
1-3 Cambridge Terrace 611	Capacity less than 10 (HELAA Appendix C)
<b>East Area</b>	
Old Road Campus 043	Site built out. Category 1 employment site. Any future developments would be assessed against other policies in the plan.
Barton Community Centre and Underhill Circus 354	Not allocated but instead upgraded to a local centre
Oxford Trust Wood Centre for Innovation 437	Not allocated but now a Category 1 employment site
Park Farm 462	Change in landowner circumstances. No interest to develop in plan period
Carpenters Yard 446	Capacity less than 10
Valentia Road 329	Capacity less than 10
Former Bartlemas Nursery School 346	Capacity less than 10
Halliday Hill/ Westlands Drive 602	Permission granted. Site at an advanced stage. Likely to commence before plan adopted.
<b>North Area</b>	
Jordan Hill Business Park 512	Site in use for economic function. No landowner interest to develop.
Frideswide Farm 107	Permission granted. Site at an advanced stage. Likely to commence before adoption of plan.
Pear Tree Farm 590	combined with 001 to form "Northern Gateway" Allocation
Summertown House Apsley Road 580	No intention to develop within the plan period.
Wychwood Tennis Courts, Charlbury Road 623	No evidence that sports use is surplus or could be re-provided. Site not available.
<b>South Area</b>	
Court Place Gardens 013	Development has commenced on site. Due for completion in plan period.
Northfield Hostel 039	Small number of homes remaining (less than 10)
Between Towns Road on corner of St Luke's Road 95a2	Planning permission granted. Site at advanced stage. Likely to commence before adoption of plan.
Royal British Legion Club, Lakefield Road 604	Complex land ownership issues, unlikely to be resolved within plan period.
Workshops Lanham Way 98	Planning permission granted. Site at an advanced stage. Likely to commence before adoption of plan.
Grandpont Car Park 106	No landowner interest.
Littlemore House (former Littlemore Park, SAE Institute) 401	Site suitable for intensified economic uses. No allocation needed.

## 6. Assessing the Local Plan policies and sites

### 6.1 Introduction

This chapter assesses the impacts of the Local Plan 2040 policies and allocated sites. Section 6.2 assesses the sustainability impacts of the plan policies; Section 6.3 assesses the sustainability impacts of the allocated sites; and Section 6.4 discusses the overall impacts of the Local Plan.

### 6.2 Task B3: Predicting the impacts of the Local Plan policies

Table 6.1 summarises the impacts of the plan policies, using the SA/SEA framework of Table 3.3. More details are available at **Appendix A**.

**Table 6.1 Summary assessment of the Local Plan 2040 policies**

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
S1 Spatial strategy & presumption in favour of sustainable development	?	0	0	?	0	0	0	++	0	0	0	+
S2 Design code & guidance	0	0	+	0	+	0	0	0	0	0	++	0
S3 Infrastructure delivery in new development	+?	0	0	0	0?	0+	0	+	0	0	0	0
S4 Plan viability	-?	0	0	+-	0	0	0	-?	0	0	0	+
H1 Housing requirement	-	-	+-	+-	+	-?	0	+	0	?	?	+-
H2 Delivering affordable homes	0	0	0	+	+	0	0	0	0	0	0	0
H3 Affordable housing contribution from new purpose-built student accommodation	0	0	0	+	+	0	0	0	0	0	0	+
H4 Affordable housing contributions from self-contained older persons accommodation	0	0	0	+-	+-	0	0	0	0	0	0	+
H5 Employer-linked affordable housing	+	0	?	+	?	0	0	+	0	+-	?	+
H6 Mix of dwelling sizes (number bedrooms)	0	0	+?	+	0	0	0	0	0	0	0	0
H7 Development involving loss of dwellings	0	0	0	0	0	+?	0	0	0	0	0	0
H8 Houses in Multiple Occupation	0	0	+	+-	+	0	0	0	0	0	0	+-
H9 Location of new student accommodation	0	0	+	0	0	0	0	0	0	0	0	+-
H10 Linking new academic facilities with the adequate provision of student accom	0	0	0	+	0	0	0	0	0	0	0	0
H11 Homes for travelling communities	0	0	?	+	+	0	?	0	0	0	0	0
H12 Homes for boat dwellers	0	0	0	0	0	0	0	0	0	0	0	0
H13 Older persons and other specialist accommodation	0	0	0	+	+	0	0	0	0	0	0	0
H14 Self-build & custom housebuilding	0	0	-?	+	?	0	0	0	0	0	0	0
H15 Hostels	0	0	0	+	+	0	0	0	0	0	0	0
H16 Boarding school accommodation	0	0	0	0	0	0	0	0	0	0	0	+-
E1 Employment strategy	+	0	++	+	0	0	0	+?	0	0	0	+
E2 Warehousing and storage uses	0	0	+	+	0	0	0	+	0	0	0	-?
E3 Affordable workspace	0	0	?	0	+	+	0	0	0	0	0	+

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
E4 Community employment plans	0	0	0	+?	+?	0	0	0	0	0	0	+
E5 Tourism and short stay accommodation	0	0	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 & provision of new green and blue features	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
G5 Enhancing onsite biodiversity in Oxford	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
G7 Flood risk and Flood Risk Assessments	0	+	+?	-?	0	0	0	0	0	0	0	+?
G8 Sustainable Drainage Systems (SuDS)	0	+	-	-?	0	0	+	0	+	+?	0	0
G9 Resilient design and construction	+?	++	0	+	+	0	0	0	+	0	+	0
R1 Net Zero buildings in operation	++	0	+?	+?	+	0	0	+?	0	+?	-?	+?
R2 Embodied carbon in the construction process	+	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
R5 Land contamination	0	0	+	0	+	0	0	0	0	0	0	0
R6 Soil quality	0	0	+?	0	0	0	0	0	0	0	0	0
R7 Amenity and environmental health impacts of development	0	0	+?	+?	0	0	0	0	0	0	0	+?
HD1 Conservation areas	0	0	-?	-?	0	0	0	0	0	0	+	0
HD2 Listed buildings	0	0	-?	-?	0	0	0	0	0	0	0	0
HD3 Registered Parks and Gardens	0	0	-?	-?	0	0	0	0	0	0	0	0
HD4 Scheduled Monuments	0	0	-?	-?	0	0	0	0	0	0	0	0
HD5 Archaeology	0	0	-?	-?	0	0	0	0	0	0	0	0
HD6 Non-designated heritage assets	0	0	-?	-?	0	0	0	0	0	0	0	0
HD7 Principles of high-quality design	0	0	0	+?	0	0	0	0	0	0	+	0
HD8 Using context to determine appropriate density	+?	0	++	+	+	+?	0	+	0	0	+?	+?
HD9 Views and building heights	0	0	-?	-?	0	0	0	0	0	0	0	0
HD10 Health impact assessment	0	0	0	0	+?	0	0	0	0	0	0	0
HD11 Privacy, daylight and sunlight	0	0	-?	-?	0	0	0	0	0	0	0	0
HD12 Internal space standards for residential	0	0	-	+	0	0	0	0	0	0	0	0
HD13 Outdoor amenity space	0	+?	+?	+?	+?	0	0	0	0	0	+	0
HD14 Accessible and adaptable homes	0	0	-?	+	?	0	0	0	0	0	0	0
HD15 Bin & bike stores & external servicing	0	0	?	0	0	0	0	+	0	0	0	0
C1 Town centre uses	+	0	+	?	0	++	0	++	0	0	0	+
C2 Maintaining vibrant centres	+	0	0	0	+	++	0	+	0	0	+?	0
C3 Protection, alteration & provision of local community facilities	0	0	0	0	0	0	0	0	0	0	0	0

	1. Carbon emissions	2. Climate change resilience	3. Efficient use of land	4. Local housing need	5. Inequalities	6. Services and facilities	7. Leisure, recreation	8. Traffic, air pollution	9. Water	10. Biodiversity	11. Design, heritage	12. Economic growth
C4 Protection, alteration & provision of learning and non-residential institutions	0	0	+	0	0	+	-?	0	0	0	0	0
C5 Protection, alteration & provision of cultural venues and visitor attractions	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 parking design standards	+	0	+-	+-	+	0	0	+	0	0	0	0
C8 Motor vehicle parking design standards	+	+	+	+-	+-	0	0	+	0	0	0	-?
C9 Electric vehicle charging	+	0	0	0	0	++	0	+	0	0	-?	0
<b>Areas of Focus</b>												
Northern Edge of Oxford	--	-	-	+-	0	--	+	--	-?	--	0	++
Cowley Branch Line and Littlemore	-	-	++	+	++	?	?	+-	-?	0	0	++
Marston Road and Old Road	-	0	+	+	0	+	0	+	-?	-	-	+
North of the City Centre	0	0	+	+?	0	0	0	0	0	-?	+	++
West End and Botley	-	-	++	?	0	0	0	-	0	-?	+	++

Of the Local Plan policies assessed in Table 6.1, the Northern Edge of Oxford Area of Focus policy was assessed as scoring a number of potentially very negative impacts, particularly under objectives 1, 6, 8 and 10. This AoF is linked to the delivery of the Northern Gateway (Oxford North), which includes delivery of a strategic employment site that was part of the Council's employment strategy at the time of the Core Strategy. There were no other options for meeting the city's identified employment need at that time other than through the delivery of an employment-led mixed-use development at this location.

The majority of the identified sustainability impacts relate to potential for encouraging car use due to the site's distance from services and also the proximity to roads, as well as potential impacts on the SAC. This area is very well served by public transport, including frequent bus services, park and ride facilities and Oxford Parkway. There is also potential for a new district centre in an urban extension site in Cherwell. Therefore, whilst the site is potentially hindered due to distance from sustainable locations, key will be the policy approach to minimise parking, ensure continued good access to public transport and to make sure there are good walking and cycling routes to and through sites and into the surrounding area (as well as ecological sites protections policy in relation to preserving the SAC). In addition, the Area of Focus policy itself provides a number of infrastructure interventions which are intended to help mitigate some of the potentially negative impacts associated with development proposed at and near the northern boundary of the city's administrative area, including mitigating impacts on the SAC.

### 6.3 Task B3: Predicting the effects of the site allocations

Table 6.2 summarises the impacts of the site allocations, using the SA/SEA framework of Table 3.4. More details on the individual site assessments are available separately as part of the consultation evidence base here:

**Table 6.2 Summary assessment of the Local Plan 2040 site allocations**

	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilit	Public open space	Biodiversity	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Archaeology	Conservation area	Listed building	View cone	High building area	Employment
Central and West area																								
SPCW01	0	0	0	0	++	I	0	I	I	+	+	+	+	-	+	+	-	0	-	-	-	0	-	I
SPCW02	0	0	0	0	++	I	0	0	I	0	+	-	+	+	+	+	-	0	-	-	-	0	-	0
SPCW03	--	0	-	0	++	I	0	0	I	-	-	0	-	-	+/-	-	-	-	-	-	-	-	-	0
SPCW04	--	-	0	0	I	I	0	+	+	-	-	+	+	-	+	+	-	-	0	-	-	0	-	0
SPCW05	--	-	0	0	++	+	0	I	I	+	+	+	-	-	-	-	-	-	-	0	0	-	-	+
SPCW06	--	-	0	0	++	I	0	I	I	+	+	+	-	-	+	-	-	-	-	-	-	-	-	+
SPCW07	--	--	0	0	++	I	0	I	I	+	-	+	+	-	-	-	-	-	0	-	0	-	-	+
SPCW08	--	--	0	0	0	0	0	0	0	0	+	0	+	-	-	-	-	0	0	0	0	0	0	0
East area																								
SPE01	0	0	0	0	++	I	0	I	+	+	+	-	+	-	-	+	-	0	-	-	-	-	0	I
SPE02	--	0	-	0	++	+	0	0	+	0	+	-	+	-	-	+	-	-	0	-	-	-	0	0
SPE03	0	0	0	0	++	I	0	I	I	-	+	-	+	-	+	-	-	0	-	-	-	-	0	0
SPE04	0	0	0	0	I	I	0	I	I	-	+	-	+	-	-	-	-	-	0	-	0	0	0	I
SPE05	0	0	-	0	++	+	0	0	0	-	+	-	+	+	+	-	-	0	0	-	0	0	0	0
SPE06	0	0	0	0	I	I	0	I	I	-	+	-	-	+	-	-	-	-	-	0	0	0	0	I
SPE07	0	0	0	0	I	I	0	I	I	0	+	-	+	-	-	-	-	0	-	0	0	0	0	I
SPE08	0	0	0	0	I	I	0	I	I	-	+	-	-	+	-	-	-	0	0	-	-	0	0	I
SPE09	0	0	-	0	++	+	+	0	0	+	+	-	+	-	+	-	-	0	-	0	0	0	0	0
SPE10	0	0	-	0	++	+	0	I	+	0	+	-	-	-	-	-	-	0	0	0	0	0	0	0
SPE11	0	0	-	0	++	+	0	0	+	0	+	-	-	-	-	-	-	0	0	0	0	0	0	0
SPE12	0	0	-	0	++	+	0	0	+	+	-	-	-	-	-	-	-	0	0	-	0	0	0	0
SPE13	0	0	0	0	I	I	0	0	I	+	+	-	+	+	+	+	-	0	0	0	0	-	0	I
SPE14	0	0	0	0	I	I	0	0	I	0	+	-	-	-	+	-	-	0	0	0	0	0	0	0
SPE15	0	0	0	0	++	+	0	I	+	-	+	-	-	-	-	-	-	0	0	0	0	0	0	I
SPE16	0	0	0	0	++	+	0	0	I	+	+	-	+	-	+	+	-	0	-	0	0	-	0	0
SPE17	0	0	-	0	++	I	0	I	+	+	+	-	+	+	+	+	-	0	-	-	-	-	0	0
SPE18	0	0	0	0	++	I	0	0	I	+	+	-	-	-	-	-	-	0	-	-	-	-	0	0
SPE19	0	0	-	0	++	I	+	0	I	+	-	-	-	-	+	-	-	0	-	-	-	-	0	0
SPE20	0	0	0	0	I	I	0	0	I	+	+	-	+	-	+	-	-	-	0	-	-	-	0	I
SPE21	0	0	0	0	++	+	0	-I	0	+	+	-	+	-	+	+	-	0	0	0	0	-	0	0
North area																								
SPN1	0	0	-	0	++	+	0	++	++	-	+	-	+	-	-	-	-	0	0	-	0	0	0	+
SPN2	0	0	-	0	++	+	0	0	+	0	+	+	-	-	-	-	-	0	0	0	0	0	0	0
SPN3	0	0	0	0	++	+	0	++	+	+	+	-	-	+	+	+	-	0	-	-	-	0	0	+
South area																								
SPS01	0	0	0	0	I	I	0	I	I	+	+	-	+	-	+	-	-	0	-	-	-	0	0	+
SPS02	--	-	0	0	++	+	++	I	+	+	+	I	+	-	+	-	-	-	0	0	0	0	0	+
SPS03	--	-	0	0	++	+	++	I	+	+	+	I	+	-	+	-	-	-	0	0	0	0	0	+
SPS04	0	0	0	0	I	I	0	0	I	0	+	-I	-	-	-	-	-	0	0	0	0	0	0	0
SPS05	--	-	0	0	I	I	0	0	I	-	+	-	-	-	-	-	-	-	-	0	-	0	0	+
SPS06	0	0	-	0	++	+	+	0	-	0	+	I	+	-	-	-	-	0	0	0	0	0	0	0
SPS07	0	0	0	0	I	I	0	I	I	+	+	-	-	-	-	-	-	-	-	0	0	0	0	+
SPS08	--	-	-	0	++	+	0	I	-	0	+	-	+	-	+	-	-	-	0	0	0	0	0	0
SPS09	0	0	0	0	++	++	++	++	+	+	+	-	+	-	+	+	-	0	0	-	-	0	0	I
SPS10	--	0	-	0	++	++	++	I	-	-	+	-	+	-	+	-	-	-	0	0	0	0	0	0



	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilit	Public open space	Biodiversity	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Archaeology	Conservation area	Listed building	View cone	High building area	Employment
SPS11	-	-	0	0	++	+	0	0	+	+	+	-	+	+	+	+	-	0	0	0	0	-	0	0
SPS12	0	0	0	0	++	+	0	0		+	+	-	+	-	+	+	-	0	-	-	-	0	0	0
SPS13	-	0	-	0	++	+	0	0		-	+	-	-	-	-	-	-	0	-	-	0	-	0	0
SPS14	0	0	-	0	++	+	+	0	+	+	+	-	+	-	+	-	-	0	-	-	0	0	0	0
SPS15	-	0	-	0	++	+	0	0	+	0	+	-	-	-	-	-	-	-	-	0	0	0	0	0
SPS16	0	0	0	0	++		0	0	0	+	+	-	-	-	+	-	-	0	0	-	0	0	0	0
SPS17	0	0	-	0	++	+	+	0	0	+	+		+	+	-	-	-	0	0	0	0	0	0	0
SPS18	-	-	+	0	++	+	0	0	0	-	+	-	+	+	-	-	-	0	0	0	0	0	0	0

Table 6.2 suggests that two of the proposed site allocations would have a significant number of negative sustainability impacts.

- SPCW03, Land off Manor Place, is partly in flood zone 3, seemingly distant from local services, and in an area with sensitive heritage assets, all of which are negative based on the criteria of Table 3.4. However, only a small amount of the site is in flood zone 3b; the site is proposed for graduate accommodation so access to e.g. primary and secondary schools is less essential; and the accommodation can be designed to be in keeping with the conservation area and nearby listed buildings.
- SPCW07, Osney Mead, there are no insurmountable constraints at this site however flood risk is an issue with most of the site in flood zone 2 or higher and some parts of the site in flood zone 3b. The SFRA Level 2 shows issues with access and egress and if left unmitigated, this is likely to have implications for the type of uses that can safely be delivered. For the Local Plan 2036 wording was agreed with the Environment Agency to overcome an objection on flood risk grounds. It will be important for new development to address the specific requirements set out in the policy and the broader flood risk policy to be found acceptable. It is also relatively far from local services, however, the Local Plan proposes the site as an extension of the city centre so this increases the potential for a wide range of class E uses including small scale retail and other uses that activate frontages at ground floor level.

## 6.4 Overall impacts of the Local Plan

Table 6.3 shows the overall impacts of all of the Local Plan 2040 policies and sites; and the cumulative impacts of the Local Plan 2040 plus other plans, projects and existing trends.

**Table 6.3 Overall and cumulative impacts of the Local Plan 2040**

SA/SEA topic	Overall impact	Cumulative impact	
<b>1. Carbon emissions</b>	+/-	+	<p>The Local Plan 2040 expects new housing to be net zero carbon (R1); promotes employer-linked affordable housing that will reduce the need to commute (H5); encourages building retrofits that reduce carbon emissions (R3); restricts car parking with indirect benefits for carbon emissions (C8); requires electric vehicle charging points to be provided (C9); and supports vibrant local centres that can be accessed by walking, cycling and public transport (C2). More generally, the Local Plan refers to “being prepared for a net zero carbon future” meaning that we are enabled to live our lives in ways that do not contribute to exacerbating climate change further, e.g. sourcing our heat and power for buildings from renewables, being able to travel in active and sustainable ways. Providing homes in Oxford, where access to services and facilities by non-car means is easier than in more rural areas, also helps to reduce carbon emissions. However the provision of 9,612 new homes (H1) will increase the number of people in Oxford, with associated carbon emissions during construction and operation. The overall effects of the Local Plan on carbon emissions are likely to be roughly neutral.</p> <p>Cumulatively with other policies, for instance, national policies on electric vehicles and the provision of electricity by renewable means, carbon emissions are likely to go down, although not at the speed needed to achieve a net-zero carbon Oxford by 2040.</p>
<b>2. Climate change resilience</b>	+/-	+	<p>The plan policies on flood risk (G7), sustainable drainage systems (G8) and resilience (G9) strongly support climate change resilience. More indirectly, policies promoting green infrastructure (G2, G3) and minimising car parking (C8) will help to prevent the urban heat island effect and support shading. The provision of 9,612 new homes (H1) will, however, further urbanise the city, and increase the potential for run-off and flooding. Seven allocated sites (six in the Central and West Area) are partly in flood zone 3b, and another seven are partly in flood zone 2 or 3a. Sites SPCW07 (Osney Mead) and SPCW08 (Botley Road retail units) have constrained egress in the case of flooding, as well as being partly in flood zone 3b. The overall effects of the Local Plan on climate resilience are likely to be roughly neutral.</p> <p>Development upstream of Oxford is likely to increase runoff, leading to increased flooding in Oxford. The Oxford Flood Alleviation Scheme, expected to be in operation by 2030, will reduce the risk of flooding to about 1000 properties in Oxford, leading to a cumulative improvement in climate change resilience.</p>
<b>3. Efficient use of land</b>	+/-	+/-	<p>The plan policies on housing density (HD8), intensification and modernisation of employment land (E1), providing space-efficient</p>

SA/SEA topic	Overall impact	Cumulative impact	
			<p>housing for students and short-term accommodation (H8, H9), and limiting parking spaces (C8) all help to make most efficient use of land in Oxford. Policy H1, which aims to provide 9,612 new homes in Oxford, would have significant impacts on greenfield land. Nineteen of the allocated sites are in greenfield land, with Northern Gateway (SPN1, 29.7ha) and Oxford Science Park (SPS5, 26.5ha) by far the largest of these. None of the allocated sites are on Green Belt land (although some are on land that was formerly Green Belt, but which was removed from the Green Belt under the Local Plan 2036). Providing housing land within Oxford will reduce the need for housing land elsewhere in Oxfordshire, where it would typically not reach the same densities and would require more parking space.</p> <p>The plan's green infrastructure, biodiversity and heritage policies reduce the 'efficiency' of land used for housing, but provide necessary safeguards for nature and heritage.</p> <p>Overall, the plan would have significant negative impacts on greenfield land, but significant positive impacts in terms of optimising development density and reducing the need to build elsewhere. Cumulatively with other Local Plans, again it would reduce the amount of undeveloped land, but less than under other alternatives.</p>
<b>4. Local housing need</b>	-	--	<p>Oxford needs 1322 homes/year including 740 affordable homes/year. More information on this is in the Housing Need Consultation of Feb. 2023. Policy H1 provides for at least 9,612 new homes between 2020 and 2040 (481 homes/year). Policies H2-H5 aim to provide affordable homes, and policies H8-H15 focus on providing specialist accommodation for people who need temporary accommodation, students and boarding school pupils, Gypsies and Travellers, boat dwellers, and older people. Overall, the plan will reduce local housing need but there will still be under-provision which adjacent local authorities would need to fill.</p> <p>As a result of a memorandum of cooperation of 2016, the other Oxfordshire authorities' current local plans are providing for about 14,300 homes to deal with Oxford's unmet housing needs. However, since the Oxfordshire Plan 2050 was shelved, and without the Growth Deal, the other Oxfordshire authorities may be less likely in the future to provide for Oxford's outstanding housing need.</p>
<b>5. Inequalities</b>	+	--	<p>Indirectly, the Local Plan will help to redress Oxford's inequalities. The plan strongly supports walking, cycling and public transport, helping people who do not have access to a car. Its focus on healthy travel and green infrastructure also helps to address health inequalities. Policy CBLAOF aims to improve access and place-making in Cowley and</p>

SA/SEA topic	Overall impact	Cumulative impact	
			<p>Littlemore. The Local Plan also aims to provide significant amounts of affordable housing through policies H2-H5, and housing for vulnerable groups such as transient workers, people experiencing homelessness, Gypsies and Travellers, and older people through policies H8-H15.</p> <p>However, Oxford continues to have some of the most expensive housing in the country compared to income, and this is unlikely to change soon. The plan cannot provide the amount of affordable housing that is needed in the city. Nationally, austerity and the cost of living crisis have hit deprived communities particularly hard, and this is likely to continue at least in the short term.</p>
<b>6. Services and facilities</b>	0	0	<p>Policy S3 aims to ensure that adequate infrastructure is available to support Oxford's housing and employment growth. Policies C1 and C2 on town/district/local centres also support the provision of services and facilities, and policies C3-C5 aim to prevent the loss of community facilities, learning institutions and cultural venues. The redevelopment of the Oxford train station, work towards a Cowley Branch Line, and other transport works (e.g. traffic filters) aim to ensure that services and facilities are easily accessible.</p> <p>The provision of 9,612 new homes, and the consequent increase in population, will increase pressures on existing services and facilities. However overall the plan, cumulatively with other plans and projects, is unlikely to significantly change access to services and facilities.</p>
<b>7. Leisure, recreation</b>	0	0	<p>The plan says little about leisure and recreation. Policy G1 on protection and G2 on enhancement of green and blue infrastructure would have a positive impact; policies G4, G6 and G8 on nature conservation would support leisure and recreation; but policy C4 could allow some school playing fields to be built on. Policy C5 aims to protect cultural venues. More widely, Oxfordshire's planned Nature Recovery Network may improve the provision of leisure and recreation, but these benefits are likely to be limited for Oxford residents.</p>
<b>8. Traffic and air pollution</b>	++	++	<p>Many of the plan policies, and the plan overall, strongly support walking, cycling and public transport. This includes policies on low-car development where there is good access to services (S1), vibrant centres and high(er) density development which reduce the need to travel (HD8, C1, C2), limited car parking (C8), and provisions for bicycles (HD15, C7).</p> <p>Cumulatively with other City Council policies on zero emission zones, low traffic neighbourhoods and traffic filters, this should significantly improve air pollution and, to a lesser extent, traffic levels in Oxford.</p>

SA/SEA topic	Overall impact	Cumulative impact	
<b>9. Water</b>	-	--	<p>The plan says little about water quality or water resources. Policy G9 requires new housing to achieve water consumption of 110 litres/person/day. Indirectly, the policies on green infrastructure, biodiversity net gain and sustainable drainage systems (G2, G4, G8) will support good water quality. However, these are unlikely to outweigh the negative impact on water resources and water quality of a significant increase in new housing.</p> <p>The plan, cumulatively with other pressures - including existing water stress, significant development in adjacent local authorities, and climate change - is likely to have a significant negative impact on water resources. Water quality is also likely to worsen with increased runoff and pressures on the region's wastewater treatment systems.</p>
<b>10. Biodiversity</b>	+/-	-	<p>The Local Plan supports biodiversity through its policies on biodiversity protection, enhancement, net gain, and green infrastructure (G2-G6). Indirectly, the plan policies on climate change (R1, R2), sustainable drainage (G8), and air quality (R4) will also support biodiversity. However, the provision of 9,612 homes will involve building on greenfield land, reducing its biodiversity. Eight allocated sites are on or adjacent to designated nature conservation sites (SPCW02, SPCW03, SPE04, SPE08, SPN1, SPS5, SPS10); and ten include or are adjacent to significant water bodies (e.g. SPCW02, SPCW03, SPCW06, SPCW07, SPE06, SPS2, SPS5, SPS7, SPS10, SPS15).</p> <p>Cumulatively, biodiversity has been plummeting nationally. Adjacent local authorities are building significant development in the Green Belt, also negatively affecting biodiversity.</p>
<b>11. Design and heritage</b>	-	0	<p>The local plan's heritage policies (HD1-HD6) are protective rather than focusing on enhancement. Policies SD2 and HD7 both promote high-quality design; policies G2 and G3 will indirectly improve design through green infrastructure; and resilience is a key component of good design (G9). Renewable energy (R1) and electric vehicle charging infrastructure (C9), and construction in greenfield locations (H1, C4) could negatively affect the land/townscape. Fifteen allocated sites are in Conservation Areas; and seven (SPCW04, SPE03, SPE08, SPE18, SPE19, SPE20, SPS09) contain listed buildings or walls.</p> <p>The NPPF and National Design Guide promote heritage protection and good design. Cumulatively with the Local Plan, change is likely to be insignificant.</p>
<b>12. Economic growth</b>	+	++	<p>The Local Plan vision is to support Oxford's excellence in research and development in the life sciences and health sectors. However, a key constraint to employment in Oxford is the shortage of affordable accommodation. As such, the plan focuses on providing housing</p>

SA/SEA topic	Overall impact	Cumulative impact	
			<p>(including employer-led housing) over providing new employment land, with employment growth planned to be primarily through the intensification of existing employment sites (E1, H5). This will indirectly support economic growth by ensuring that the city remains a attractive for employers and employees. The scale of housing provision supports Oxfordshire’s wider economic policies. Policy E3 also supports affordable workspaces, which can act as starting points for new businesses.</p> <p>Oxford will continue to be the economic heart of Oxfordshire, with Oxfordshire’s Strategic Economic Plan promoting high levels of housing and employment growth despite a bleaker national picture.</p>

The Local Plan’s main **direct** impacts are likely to be the provision of housing, including affordable housing with associated benefits for health and inequality; more energy-efficient development with associated climate change benefits; higher density development with land use efficiency benefits but possible negative townscape impacts; a neutralisation of biodiversity impacts through its policies on net biodiversity gain, urban greening etc.; and development

**Indirectly**, the Local Plan will encourage walking, cycling and public transport, with associated benefits for health, air quality and congestion. It encourages a gradual shift from employment land to housing land (but keeping jobs in the city by intensifying existing employment sites), and supports for high-tech employment, thus helping to indirectly support the local and regional economy. The plan’s environmental policies help to protect and enhance the city’s green areas, indirectly improving air quality, recreation, and climate change adaptation.

The Local Plan’s main **short-term, temporary** impacts are the construction of new homes, with associated loss of greenfield land, dust, noise, traffic and other impacts. The plan responds to an increase in the city’s population, helping to reduce housing need. **Long-term, permanent** impacts of the plan include a gradual improvement in the city’s jobs-housing balance, reduced car traffic and air pollution, reduced carbon emissions, increased provision of affordable housing, reduced deprivation, and support for the region’s economy; but also increased urbanisation, an intensification of development and probably taller buildings, and increased water stress.

## 7. Mitigating the Local Plan's impacts

### 7.1 Task B4. Mitigating negative impacts of the Local Plan policies

Table 7.1 shows suggestions for mitigating negative impacts of the Local Plan policies and enhancing their positive impacts, based on the policy appraisal of **Appendix A**. It also shows the planning team's response to these suggested mitigation measures.

**Table 7.1 Suggested mitigation measures for plan policies and planning team response**

Draft policy	SA recommendations / suggested mitigation	Planning team response
H2 Delivering affordable homes	Does the policy need to specify that the affordable housing will be affordable 'in perpetuity'?	This is not permitted under Right to Buy.
	Should the policy specify that students would not be allowed to bring any cars, and park anywhere in Oxford, rather than not parking on site?	An old version of the 2036 plan policy tried to do this, but the Inspector changed it because it was considered unimplementable. The intention is for the city's Controlled Parking Zone expansion to deal with this.
H11 Homes for travelling communities	Does the policy need to say anything about maximising the density of development?	Difficult to determine what this should look like in practice, e.g. caravans per hectare
H12 Homes for boat dwellers	Should the policy say anything about providing services for boat dwellers, e.g. supporting the delivery of water provision, storage, communal areas?	The policy requires there to be access to services such as potable water and waste disposal. It is not considered feasible for new residential moorings to be able to ensure there are communal areas or storage.
H14 Self-Build & Custom housebuilding	Need to specify the 'proportion of the site area' left for self-build?	This policy will be amended to state a proportion.
H16 Boarding school accommodation	Boarding school accommodation really shouldn't be causing much of a traffic impact at all (except when boarders are initially being delivered and finally picked up). Is 'severe impact' too generous here?	Agree, but it needs a threshold and this level is generally used in Transport Appraisals. The term 'unacceptable' is too vague.
Green city policies	Do Policies G1-G6 all apply to all developments? Can they be rationalized, e.g. using one checklist or calculator?	G1, G2, and G5 and G6 will relate to all developments. G3 is only mandated for major developments, though encouraged for others. We have considered whether requirements could be rationalised further but this would be challenging. G4-G6 have very specific focus on supporting biodiversity, whilst G1-G3 could support biodiversity but have a broader focus. G1 and G6 deal with protection of Green Infrastructure and designated sites specifically (which is

Draft policy	SA recommendations / suggested mitigation	Planning team response
		subject to different and more prescriptive considerations than other types of green space).
G1 Protection of the Green Infrastructure	<ul style="list-style-type: none"> <li>Clarify wording on important hedgerows in the final paragraph.</li> <li>The first sentence of this policy refers to enhancement of GI. Refer to Policy G2 as part of that?</li> </ul>	Hedgerows are addressed in the earlier section of the policy thus were not covered by this section which we were trying to make clear in the wording, but agree the caveat is not helpful and confuses things so have amended. The policy has been amended make a clearer distinction between G1 and G2.
G3 Provision of new Green and Blue features – Urban Greening Factor	Unclear what developments would require this, and how it differs from biodiversity net gain and Green Infrastructure enhancement policies.	The policy sets out that the specific targets are expected of major development. This was not so clear in the supporting text, so we have amended this. The considerations set out in G2 are essentially the design standards that the Green Infrastructure provided to meet requirements of G3 should follow. Biodiversity Net Gain as set out in G4 is a statutory requirement focussed purely on habitat creation and must meet specific requirements set out in DEFRA Metric. Meanwhile, the greening under G2 and G3 could support biodiversity but also a range of other green functions.
G4 Delivering mandatory net gains in biodiversity	Reduce duplication/overlap: there seems to be duplication between para. 5 and paras. 3 and 4.	We have amended the policy wording to reduce duplication as suggested.
G9 Resilient Design and Construction	Should this policy cross-refer to policy R1 on renewable energy, for instance requiring any air conditioning units to be powered by renewables?	We have amended the reference to passive cooling to include reference to energy efficient features and cross ref to R1 as suggested. We will also expand on this consideration in the design appendix.
	Is it worth specifying that passive cooling includes shade trees, and linking that to the urban greening policy? The one big sustainability concern about this policy is whether it will involve the installation of air conditioning units where they otherwise might not be, with associated impacts on energy consumption.	Policy R1 should ensure that all energy demands (including those for cooling) are met through onsite renewables (or else offsetting). We agree however that passive cooling (and this would include green features to a degree), should be the preference. The amendment addressed above (cross ref to R1) should help reinforce this. It is difficult to cover every potential measure that policy G9 could include so do not propose to amend further. We will however also



Draft policy	SA recommendations / suggested mitigation	Planning team response
		discuss adaptation measures part of the design guide appendix and will address this point there also.
R1 Net Zero buildings in operation	<p>Clarify the OCC policy towards wood fuel /pellet burners: are they 'zero carbon'? Are wood burners allowed at all in new build?</p> <p>Are there any concern about double-counting of off-site offsetting, e.g. 1000 households contribute to an offsite solar farm which only provides 800 homes worth of energy?</p>	<p>Depending on fuel source it could be argued that they are carbon neutral. The policy is agnostic on technology used for space heating/renewables, so in effect does not explicitly support or ban them and we would not propose to run through every tech option within the policy (in part to future-proof against changing technologies). However, their installation could come into conflict with air quality policy and smoke control areas, so there may be other considerations which make the inappropriate.</p> <p>The way offsetting is delivered (where an applicant has paid into the Council's fund) would need to be managed through a transparent and logical process which will fall under the management of the fund. This will need to include avoiding double-counting. This is not considered to be something the policy wording can directly address.</p>
R2 Embodied carbon in the construction process	If an existing building is very energy inefficient, should it still be re-used rather than replaced?	The answer will depend on the circumstances of each proposal and there is not a simple yes or no. In effect, this will form part of the 'robust exploration' of feasibility of retaining building as is covered under part A. A TAN will likely expand on what this means (including energy efficiency of existing building).
R3 Retro-fitting existing buildings	Can the policy be made stronger, e.g. require energy efficiency level X, renewable energy provision etc. for all refurbishments?	Policy RE1 comes into effect for a lot of new development including where it affects existing builds - e.g. conversion or extension of existing buildings. Whilst not all of RE1's standards apply, it still enforces certain standards of retro-fit there - e.g. follow energy hierarchy. It is tricky to go further here, as we cannot force buildings to be retro-fitted - instead this policy seeks to provide clarity that the council will wherever possible look positively on such applications where they come forward.

Draft policy	SA recommendations / suggested mitigation	Planning team response
HD1 Conservation Areas to... HD6 Non-designated heritage assets	Is it possible to enhance conservation areas/listed buildings/ etc? If so, should that be encouraged here, and possibly ideas provided about what such enhancement could look like?	The emphasis in the National Planning Policy Framework and therefore the policy is weighing up harm to significance against benefits the scheme bring, and mitigating harm- so enhancement would be welcome but is not the intention of the policy.
HD4 Scheduled Monuments	Policies HD1-HD3 each includes a statement explaining the circumstances under which planning permission would not be granted, e.g. exceptional, wholly exceptional, substantial harm. Does this policy need something similar?	This has now been amended to be consistent with the other policies.
HD8 Using Context to Determine Appropriate Density	Does the policy need to say anything about minimum density? Otherwise b. suggests that the density of new development should be 'anchored' at the existing density of the neighbourhood where the development is proposed.	The policy gives an indicative (very high) density for city and district centres of 100dph
HD10. Health Impact Assessment	Ensure that the Technical Advice Note includes health issues regarding climate change (e.g. need for shading); also active travel.	The Technical Advice Note will need to expand on the relevant considerations that HIAs may need to cover which would include these considerations. Requirements under policy G9 (Resilient design) also address the need for considering the risks of climate change on occupants (such as overheating) and set out measures to address these e.g. requiring applicants to incorporate a cooling strategy into the design approach.
HD15 Bin and Bike Stores and External Servicing Features	The policy does not REQUIRE bin or bike storage, or explain how much must be provided.	Words added to policy about requirement, meanwhile it is envisaged that the TANs would provide the details behind the policy
C1 Town Centre Uses	Are any new Local Centres needed, for instance in Littlemore, Oxford North, or Osney Mead/West End/Botley Road?	Areas have been assessed as to whether they qualify as Local Centres and the Barton Underhill Circus added from previous plan
C2 Maintaining vibrant centres	Does the City Centre section need to say anything about Westgate v. Cornmarket?	Both are considered important and the evidence suggests no additional need, but no pressing need to 'shrink' the area of the city centre protected for active frontages and mixed use.

Draft policy	SA recommendations / suggested mitigation	Planning team response
	Does the policy need to say anything about public art; maintenance/enhancement of existing public spaces in the centres; shading, e.g. by trees or sails/structures as resilience to future climate change?	These points are all covered in the design appendix, but also public realm and Green Infrastructure is referred to for a number of the centres in the policy.
C6 Transport Assessments, Travel Plans and Service and Delivery Plans	Can anything more be said to encourage zero carbon transport, e.g. car-free development; Transport Plan should show how new development will be zero carbon in terms of transport as well as housing?	This is covered by approach to low car (term instead of car free ) policy C9
C7 Bicycle and Powered Two Wheelers Parking Design Standards  Policy C9: Electric Vehicle Charging	Can something be said that links provision of on-site renewables with electric vehicle charging? Shading of parking bays would also support resilience to climate change.	We would envisage that this is a level of detail that could ultimately be picked up by one of the Technical Advice Notes (TAN) supporting the new Local Plan.
Northern Edge AOF	Clarify that future development requires an appropriate assessment which must consider hydrology as well as air pollution impacts on Oxford Meadow SAC	Air quality and hydrological impacts for the plan will be addressed by the Local Plan HRA.
Cowley Branch Line and Littlemore AOF	Will the redevelopment of the Blackbird Leys centre provide adequate services/facilities for the area, or are more required?	The focus is on maintaining provision.
	Can more publicly accessible green space be provided as part of the redevelopment of the area: for instance could a walking/cycling route between Blackbird Leys and Littlemore be provided via the Oxford Science Park? Or alongside the future Cowley Branch Line?	The policies for individual sites mention where there is potential for enhanced sustainable travel routes.
	Development at Kassam and Oxford Science Park would need to be flood-resistant.	Applicants will need to refer to the main policy for this.
Marston Road and Old Road AOF	This area may be prone to HMOs, and especially to HMOs that might be turned into student accommodation in the future. This may require specific standards to be put in place to help maintain the character of the area.	The HMO policy sets a maximum concentration of HMOs, over which new HMOs will not be permitted. This applies everywhere. Likewise, student accommodation is limited to particular locations anyway.

Draft policy	SA recommendations / suggested mitigation	Planning team response
	Specify that accommodation in the area is expected to be car-free (student accommodation, employer-linked housing)	Probably not needed to repeat the requirements of the low car policy, as they will not be applied in any bespoke way to this area.
North of the City Centre AOF	Specify that all housing development (maybe all development) in this area is expected to be car-free	As above
West End and Botley AOF	Development should be required to be flood-resilient (e.g. with parking on the ground floor)	This is picked up by the flood risk policy.
	Given the good public transport in the area, should most or all new housing be car free?	The low car policy sets out the parking requirements.

## 7.2 Mitigating negative site-specific impacts

Where development on allocated sites is likely to have significant impacts, the site allocation policies of the Local Plan (Chapter 8 of the plan) include mitigation measures to minimise or obviate those impacts. Many of these refer to the plan's development management policies. These include mitigation measures related to:

- A. Tall buildings (HD9 Views and Building Heights)
- B. Urban design (HD7 Principles of High-Quality Design)
- C. Buffer area around adjacent wildlife site (G6 Protecting Oxford's Biodiversity)
- D. Walking, cycling, public transport
- E. Protection of view cone (HD9 Views and Building Heights)
- F. Protection of archaeology (HD5 Archaeology)
- G. Provision/protection of community facilities (C3 Protection, Alteration and Provision of Local Community Facilities)
- H. Protection of biodiversity, HRA related (G6 Protecting Oxford's Biodiversity)
- I. No net loss of biodiversity, urban greening (G1 Protection of Green Infrastructure, G3 Provision of New Green & Blue Features – Urban Greening Factor)
- J. Compensation re. green belt
- K. Conservation area management (HD1 Conservation Areas)
- L. Air quality management (R4 Air Quality Assessments and Standards)
- M. Provision of public open space (G2 Enhancement & Provision of New Green and Blue Infrastructure)
- N. Listed building management (HD2 Listed Buildings)
- O. Protection of water body / SuDS (G8 Sustainable Drainage Systems)
- P. Protection from flood risk / sequential approach (G7 Flood Risk and Flood Risk Assessments)

As part of the SA/SEA process, the site assessments, which are summarised at Table 6.2 of this SA/SEA, were compared to the wording of the site allocation policies in Chapter 8 of the Local Plan. Table 7.2 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 in the site allocation policies (the letters relate to the mitigation measures listed above). This allows for a cross-check to ensure that all significant impacts are mitigated.

**Table 7.2 Mitigation measures (letters) for negative impacts identified as part of the site assessment process (red and amber in Table 6.2)**

	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilit	Public open space	Biodiversity	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Archaeology	Conservation area	Listed building	View cone	High building area	Employment
Central and West area																								
NCC AOF								G		I							L							A
SPCW1												D	D	D	D	D			F	K	N			
SPCW2												D	D	D	D	D		O	F	K	N			
SPCW3	P		I							I	D	D	D	D	D	D		O	F	K	N	E		
SPCW4	P	P						M		H	D	D	D	D	D	D	L	O		K	N			
SPCW5	P	P								I		D	D	D	D	D		O	F				E	A
SPCW6	P	P								I		D	D	D	D	D	L	O	F	K	N	E	A	
SPCW7	P	P						M			D	D	D	D	D	D		O		K		E	A	
SPCW8	P	P								I		D	D	D	D	D		O		K				
East area																								
MROR AOF										I		D	D	D	D	D	L				B	K		A
SPE1										I		D	D	D	D	D	L	O	F	K	N	E		
SPE2	P		I					M		I		D	D	D	D	D		O		K	N			
SPE3										H		D	D	D	D	D	L	O	F	K	N	E		
SPE4										I		D	D	D	D	D		O		K				
SPE5			I							I		D	D	D	D	D				K				
SPE6										I		D	D	D	D	D		O	F					
SPE7										I		D	D	D	D	D		O	F					
SPE8								G		I		D	D	D	D	D		O	F	K	N			
SPE9			I					G				D	D	D	D	D	L		F					
SPE10			I	J				M		I		D	D	D	D	D	L			K				A
SPE11			I	J						I		D	D	D	D	D	L			K				
SPE12			I	J						I	D	D	D	D	D	D	L			K				
SPE13												D	D	D	D	D							E	
SPE14										I		D	D	D	D	D	L	O						
SPE15								G		I		D	D	D	D	D	L							A
SPE16										I		D	D	D	D	D			F				E	
SPE17			I					G		I		D	D	D	D	D		O		K	N	E		
SPE18										I	D	D	D	D	D	D			F	K	N			
SPE19			I							I	D	D	D	D	D	D	L		F	K	N			
SPE20										I		D	D	D	D	D		O		K	N	E		
SPE21								G				D	D	D	D	D	L						E	
North area																								
NEO AOF										I	E		D	D	D	D				B				A
SPN1			J	J				G		H		D	D	D	D	D	L		F	K				
SPN2			I					M		H	I		D	D	D	D	D							
SPN3			I							I		D	D	D	D	D			F	K	N			
South area																								
CBLL AOF										I		D	D	D	D	D								A
SPS1										I		D	D	D	D	D			F	K	N			A
SPS2	P	P						M		I		D	D	D	D	D		O						
SPS3	P	P								I	C		D	D	D	D		O	F					
SPS4										I		D	D	D	D	D	L							A
SPS5	P	P	I							I	C		D	D	D	D		O	F		N			A
SPS6			I					G	M	I		D	D	D	D	D		O	F					A

	Flood zone	Flood egress	Prev. devel. land	Green Belt	Housing provision	Affordable housing	Regeneration	Community facilit	Public open space	Biodiversity	Bus stop	Rail station	Primary school	Secondary school	GP	Post office	Air quality area	Water body	Archaeology	Conservation area	Listed building	View cone	High building area	Employment
SPS7										I		D	D	D	D	D		O	F					
SPS8	P	P	I					G	M	I		D	D	D	D	D		O						
SPS9										I		D	D	D	D	D				K	N		A	
SPS10	P		I							I		D	D	D	D	D		O						
SPS11	P	P								I		D	D	D	D	D		O					E	
SPS12										I		D	D	D	D	D			F	K	N		A	
SPS13	P		I							I		D	D	D	D	D		O	F	K			E	
SPS14			I					G	M	I		D	D	D	D	D			F	K			E	
SPS15	P		I	J						I		D	D	D	D	D		O	F	K				
SPS16			I					G		I		D	D	D	D	D				K				
SPS17			I							I		D	D	D	D	D	L							
SPS18	P	P								I		D	D	D	D	D			I					

This comparison identified some impacts flagged in the site assessments that had not initially clearly been mitigated in the site allocation policies. Subsequently the team have 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 because of subsequent work that has refined the initial site assessment findings or where an overarching policy elsewhere in the Local Plan will address the issue without need for more site specific guidance. For example:

- For air quality the whole city is an Air Quality Management Area (AQMA) which was why all sites scored double negative in initial site assessment. The reason the whole city was declared an AQMA was because there are a number of hotspots dispersed across the area generally corresponding with high traffic areas, so the decision was taken to declare the whole city AQMA. When drafting policy mitigation, further analysis was undertaken to determine proximity of sites to these hotspots and where sites were in proximity, additional wording is included in the policy. A generic policy also applies across the city for air quality.
- Where lack of access to a service such as bus stop or rail station has been noted as a negative impact, the focus on policy mitigation is generally around setting out that proposals will need to consider measures that can support active travel and improve connectivity to services in wider area where the expected growth from the site is not expected to generate enough demand for a new stop.
- In relation to tall buildings, in certain locations such as the West End area it was considered that there is more pressure on building heights so we have included specific reference to policy HD9, however in other locations this was not deemed as necessary (for example SPCW3 and SPCW4. Equally some sites are covered by the guidance in the area of focus which references policy HD9 where it is deemed necessary such as SPCW1 and SPCW2.

## 8. Monitoring the Local Plan's impacts

The City Council have been monitoring the effectiveness of the current Local Plan 2036 every year, and making the findings public in Authority Monitoring Reports, which are available at

[https://www.oxford.gov.uk/downloads/download/420/annual\\_monitoring\\_report](https://www.oxford.gov.uk/downloads/download/420/annual_monitoring_report). As part of this some (but not all) of the monitoring 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.

Reflecting these realities, Table 8.1 aims to propose a realistic SA/SEA monitoring framework. It is in two sections. The first section relates to Local Plan outcomes; 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 relates to more long-term sustainability outcomes; would be monitored every 3 years; link to some environmental standards; 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. They also aim to act as a step towards the government’s proposed Environmental Outcome Reporting.

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**

SA/SEA topic	Monitoring of Local Plan 2040 outcomes (every year)	Monitoring of sustainability outcomes (every 3 years)	Target/standard
1. Carbon emissions	Contributions secured and proportion of fund spent against climate change offsetting fund (assumes that all other developments are net zero carbon)	Change in per capita CO2 emissions	Net zero carbon city by 2040
2. Climate change resilience	Applications permitted against Environment Agency flood risk advice	Change in no. homes in flood zone 3	Reduction of homes in flood zone 3
3. Efficient use of land / 7. Leisure and recreation	Applications permitted on protected green space		Resist loss of protected green space
4. Local housing need	Net housing completions	Change in population / households	
5. Inequalities	Net affordable housing completions	Index of Multiple Deprivation	Reduced deprivation
		Health dimension of Index of Multiple Deprivation	
6. Services and facilities	Applications permitted for new community spaces, cultural venues and visitor attractions	Significant new community assets	
8. Transport and air quality	Air quality progress: NOx, PM10, PM2.5	Modal split of journey in Oxford	City/UK air quality standards
9. Water	Applications permitted on protected peat reserves	% river length assessed as fairly good or very good for	Water Framework

<b>SA/SEA topic</b>	<b>Monitoring of Local Plan 2040 outcomes (every year)</b>	<b>Monitoring of sustainability outcomes (every 3 years)</b>	<b>Target/standard</b>
		chemical quality and biological quality	Directive targets
10. Biodiversity	Biodiversity net gain being delivered in the city	Area (ha) in areas of biodiversity importance	No reduction
		Condition of SSSIs, integrity of SACs	Good condition and integrity
11. 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	



## 9. Next steps

Any comments on the Regulation 19 plan and this SA/SEA report should be submitted as part of the draft submission Local Plan 2040 consultation, more details can be found on the website:

Local Plan 2040 general webpage:

[https://www.oxford.gov.uk/info/20067/planning\\_policy/1460/oxford\\_local\\_plan\\_2040](https://www.oxford.gov.uk/info/20067/planning_policy/1460/oxford_local_plan_2040)

Consultation webpages:

<https://consultation.oxford.gov.uk>

The Local Plan will be revised as appropriate after this consultation, and is expected to be submitted for examination in March 2024. 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 June 2025.