

**Oxford Core Strategy Sustainability Appraisal and Habitats
Regulations Assessment Post-Adoption Statement**

March 2011



TABLE OF CONTENTS

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

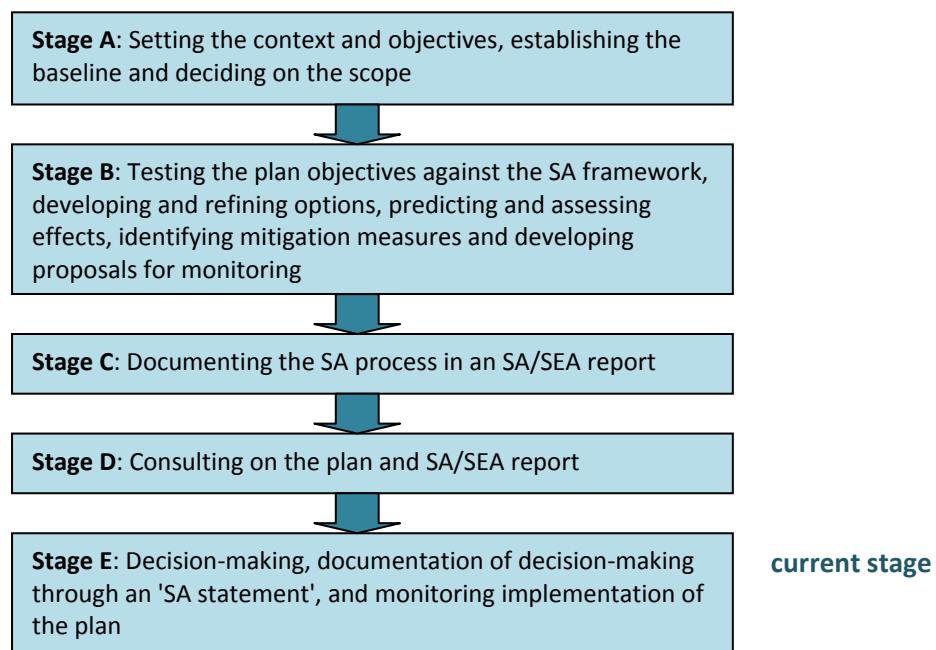
1. INTRODUCTION

After a five year development period, Oxford City Council’s Core Strategy was approved by the Planning Inspectorate in December 2010, and was adopted by the Full Council on 14 March 2011. As part of the development of the Core Strategy, its effects were assessed through a sustainability appraisal (SA) and a Habitats Regulations Assessment (HRA). This report explains how the SA and HRA processes affected the development of the Oxford Core Strategy: it is the 'SA statement' for the Core Strategy.

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

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

Figure 1.1 The sustainability appraisal / strategic environmental assessment process



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

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

The SA/SEA and HRA processes have had considerable effect on the development of the Oxford Core Strategy. They have led to a range of further studies being commissioned (e.g. on biodiversity, transport, water levels). The SA/SEA has led to Southfield Golf Course being dropped as a housing site. Most of the options for the plan that were found to be the most sustainable in the SA/SEA have been taken forward through the Core Strategy. The wording of the Core Strategy has been modified in response to consultee comments on the SA/SEA findings and the HRA, and several Development Plan Documents/Area Action Plans will take forward some of the other recommendations of the SA/SEA.

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

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

The HRA process for the Core Strategy is summarised at Section 7.

Much of the information in this report is a summary of more detailed reports which were prepared as Core Documents for the Examination in Public of the Core Strategy, and which are available in full from http://www.oxford.gov.uk/PageRender/decP/Core_Documents_occw.htm. Throughout this SA/SEA statement, 'CDx/x' refers to these Core Documents.

Acronyms used in this report

AAP	Area Action Plan
AO	alternative option (see Table 5.1)
CD	Core Document
CS	Core Strategy
EiP	Examination in Public
HRA	Habitats Regulations Assessment
O	option (see Table 5.1)
PA	preferred approach (see Table 5.1)
PO	preferred option (see Table 5.1)
SA	sustainability appraisal
SAC	Special Area of Conservation (under the Habitats Directive)
SEA	strategic environmental assessment
SPD	Supplementary Planning Document

2. HOW ENVIRONMENTAL/SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE OXFORD CORE STRATEGY

The Core Strategy has gone through a series of stages over five years, starting with evidence gathering, then issues and options, preferred options, further preferred options in response to the requirements of the South East Plan, proposed submission Core Strategy, and two sets of changes after submission. The SA was carried out in house, with periodic quality reviews by Levett-Therivel. This has allowed the findings of the SA to be fully integrated into the preparation of the Core Strategy. An SA/SEA scoping report was prepared as part of the evidence gathering stage, and the sustainability impacts of the evolving Core Strategy were subsequently assessed at each stage of plan-making. This is shown in Table 2.1.

Table 2.1. Links between Core Strategy development and SA/SEA

Date	Plan-making stage	SA/SEA stage	Comments
2005	Evidence gathering	Scoping report	The scoping report also covered Parking Standards, Transport Assessments and Travel Plans SPD, and Planning Obligations SPD
31 Jan. – 14 March 2006		Consultation with statutory consultees and others on scoping report	Responses received from County Council, Environment Agency and English Nature
early 2006	Preparation of issues and options paper	Appraisal of initial options	
16 June – 28 July 2006	Consultation on Issues and Options paper	(The appraisal was not published at the time but was subsequently incorporated into the SA report at the Preferred Options stage)	
Late 2006, early 2007	Preparation of Core Strategy Preferred Options Document	Appraisal of preferred options, preparation of initial SA report: <i>Sustainability Appraisal of the Oxford City Council Core Strategy Preferred Options – March 2007</i>	
30 March – 11 May 2007	Consultation on Preferred Options Document	Consultation on initial SA report	Three consultation responses concerning the SA report
late 2007, early 2008	Preparation of Core Strategy Further Preferred Options document (relating mainly to	Appraisal of further preferred options, preparation of addendum to the initial SA report: <i>Addendum to the Sustainability Appraisal of</i>	

Date	Plan-making stage	SA/SEA stage	Comments
	South Oxford Strategic Development Area)	<i>the Oxford Core Strategy – March 2008</i>	
7 March – 18 April 2008	Consultation on Further Preferred Options	Consultation on addendum to the initial SA report	No substantive consultation comments on addendum
Summer 2008	Preparation of Core Strategy Proposed Submission document	Preparation of final SA report: <i>Sustainability Appraisal of the Oxford Core Strategy – September 2008</i>	Addressed significant changes since the Preferred / Further Preferred Options
5 Sep – 17 Oct 2008	Consultation on Core Strategy Proposed Submission document	Consultation on final SA report	Comments on the SA received from three consultees
21 Nov 2008	Submitted Core Strategy with Statement of Representations Received and Consultation Statement		
early 2009	Addition of further detail to the Core Strategy in response to initial comments by the Inspector	Preparation of addendum to final SA report: <i>Addendum to the Sustainability Appraisal of the Oxford Core Strategy – April 2009</i>	Appraisal focused on hierarchy of centres, West End, Northern Gateway, land at Barton
3 April – 15 May 2009	Consultation on Proposed Changes (within Examination)	Consultation on addendum to final SA report	No substantive comments on addendum
July and Sep 2009	Initial Examination hearings		
Oct 2009	Examination suspended		
9 April – 21 May 2010	Consultation on Further Proposed Changes (within Examination)		Additional SA not required as the Core Strategy had already been appraised with and without the South Oxford SDA
Sep 2010	Second set of Examination hearings		
Dec 2010	Final Inspector's Report received		
14 March 2011	Core Strategy adopted		

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

Table 2.2 SA/SEA Framework for the Core Strategy

SEA objective	SEA Directive topic
To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	human health water
To encourage urban renaissance by improving efficiency in land use, design and layout	soil interrelationships
To meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home	population human health
To improve the health and well-being of the population and reduce inequalities in health	human health
To reduce poverty and social exclusion	population
To raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work	human health material assets
To reduce crime and fear of crime	interrelationships
To create and sustain vibrant communities	
To provide accessible essential services and facilities	
To make opportunities for culture, leisure and recreation readily accessible	
To reduce air pollution and ensure air quality continues to improve	air
To address the causes of climate change through reducing emissions of greenhouse gases, and ensure that Oxford is prepared for associated impacts	climatic factors
To conserve and enhance Oxford's biodiversity	biodiversity flora fauna
To protect and enhance and make accessible for enjoyment Oxford's countryside and historic environment	landscape cultural heritage
To reduce road congestion and pollution levels by improving travel choice, shortening length and duration of journeys and reducing the need for travel by car/lorry	air climatic factors
To use natural resources sustainably	water soil climatic factors
To reduce waste generation and disposal, and achieve the sustainable management of waste	material assets
To maintain and improve water and soil quality and to achieve sustainable water and soil resource management	water soil
To increase energy efficiency and the proportion of energy generated from renewable sources in Oxford	climatic factors material assets
To develop and maintain a skilled workforce to support long-term competitiveness of the region	
To ensure high and stable levels of employment so everyone can benefit from the economic growth of Oxford	
To sustain economic growth and competitiveness across Oxford	
To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	
To stimulate economic revival in priority regeneration areas.	

To encourage the development of a buoyant, sustainable tourism sector	
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3. HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

The SA process helped to identify preferred options for the Core Strategy: this is discussed at Section 5. In particular, studies carried out as a result of the SA helped to eliminate Southfield Golf Course from consideration as a housing site. This chapter considers other influences that the SA had on the development of the Core Strategy.

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

In addition to these incremental, 'invisible' changes, the earlier SA reports (2007-8) identified the need for additional research, guidance and more detailed plans; and the SA report of April 2009 recommended some further fine-tuning of words. These are discussed here.

Initial SA Report of March 2007

The SA report of March 2007 assessed the impact of a range of options and recommended mitigation and enhancement measures for the preferred options. Table 3.1 shows that most of the mitigation measures have been implemented, although some later than initially expected, in part because of subsequent changes required in response to changes in the South East Regional Spatial Strategy.

Table 3.1 Mitigation measures proposed in March 2007 SA report

Proposed mitigation measure	Relevant Core Strategy policies	Were the mitigation measures implemented?
Study opportunities to develop renewable energy and/or low-carbon energy sources and supporting infrastructure	Pear Tree / Northern Gateway safeguarded land; Summertown safeguarded land; Barton safeguarded land; Southfield Golf Course (if chosen for housing)	<p>A study on district heating for the West End recommended use of a biomass boiler at Westgate and Combined Heat and Power at Oxpens. The City Council was in the process of finding funding for an energy service company when the Westgate development was put on hold.</p> <p>A feasibility study for a district heating network for the University of Oxford was carried out, but found it to be too expensive.</p> <p>The Area Action Plans for Barton and Northern Gateway will consider the</p>

Proposed mitigation measure	Relevant Core Strategy policies	Were the mitigation measures implemented?
<p>Biodiversity surveys of main areas proposed for development.</p>	<p>Pear Tree / Northern Gateway safeguarded land; Summertown safeguarded land; Barton safeguarded land; Southfield Golf Course (if chosen for housing)</p>	<p>use of renewable energy.</p> <p>Pear Tree / Northern Gateway – developers commissioned a Phase I habitat survey (CD14/23) and bird report (CD14/26) in June 2007, and an ecological appraisal in May 2008 (CD14/14).</p> <p>Summertown – A Phase I habitat and Phase II botanical survey (CD14/29), and a breeding bird survey (CD14/30) were all completed in July 2007.</p> <p>Barton – An initial biodiversity assessment was carried out in October 2007 (CD14/24), and further work was subsequently carried out in 2010 to inform the AAP</p> <p>Southfield Golf Course was not chosen for housing</p>
<p>Carry out transport modelling and identify appropriate mitigation measures before the Core Strategy submission document is completed. Implementation of the mitigation measures would be by means of AAPs</p>	<p>Pear Tree / Northern Gateway safeguarded land; Summertown safeguarded land; Barton safeguarded land; Southfield Golf Course (if chosen for housing); Hospital and medical research</p>	<p>Pear Tree Scoping Transport Assessment (CD14/19) and Interim Transport Statement (CD14/20) were prepared in August 2007 and August 2008 respectively. A framework travel plan was also prepared in August 2008 (CD14/22). The results of a coarse trip generation and distribution modelling exercise were presented in August 2009 (CD15/16).</p> <p>Transport modelling for a Southern Urban Extension was prepared in February 2009 (CD 8/10).</p> <p>A preliminary transport appraisal was carried out for Barton in July 2009 (CD15/12)</p> <p>Transport modelling was also undertaken of the cumulative impacts of the housing and employment growth proposals in the Core Strategy, including land at Summertown (CD5/11)</p> <p>Southfield Golf Course was not chosen for housing, so no transport studies were carried out.</p>

Proposed mitigation measure	Relevant Core Strategy policies	Were the mitigation measures implemented?
Assess the supply and demand for hotel and short-stay accommodation in Oxford	Tourism	A study on hotel and short stay accommodation was completed in November 2007 (CD14/9)
Flooding SPD to be produced 2008/09; Completion of a Strategic Flood Risk Assessment before the Core Strategy submission document; Application of guidance in PPS25 on Development and Flood Risk and existing saved Local Plan policies	Level of housing growth; Appropriate economic growth; Flooding	This measure was overtaken by the publication of PPS25 in December 2006 and associated good practice guide in December 2009. A Strategic Flood Risk Assessment (SFRA) for Oxford was prepared in December 2007 (CD 14/25). A SRFA for site allocations is currently being prepared.
Provision should be made for incorporation of necessary infrastructure within new residential development, by making appropriate allocations in relevant DPDs	Timing of housing delivery	This will be done through the Barton Area Action Plan and the housing allocations policies in the forthcoming Site Allocations DPD. Oxford City Council will consider whether to implement a Community Infrastructure Levy.
Work on Site Allocations DPD to start in December 2008; More guidance on issues such as access, landscaping and biodiversity needs to be included in the Site Allocations DPD.	Level of housing growth; Student accommodation provision; Gypsy and traveller accommodation; Building on Oxford's economic strengths; Summertown safeguarded land; Barton safeguarded land	Work on Site Allocations DPD started in Autumn 2010. Delay was mainly due to delays in the Core Strategy Examination
Biodiversity Technical Advice Note to be issued Summer 2007	Level of housing growth; Appropriate economic growth; Biodiversity	The note has not yet been published
Work on the Pear Tree / Northern Gateway AAP is scheduled to start December 2008. The West End AAP is due to be submitted to the Secretary of State in June 2007	Appropriate economic growth	Work on the Pear Tree/ Northern Gateway AAP was put on hold pending the outcome of the Core Strategy Examination. A new start date for the AAP has not yet been scheduled. The West End AAP was adopted in June 2008.
Timetable for Green Belt review, which will need to be carried out with neighbouring authorities, needs to be agreed	Green Belt	Review will be carried out as part of the Northern Gateway AAP
Completion of appropriate assessment prior to completion of the Core Strategy submission	Pear Tree / Northern Gateway Safeguarded Land	A Habitats Regulations Assessment was prepared in September 2008 and updated in July 2009 (CD4/4- CD4/5)

Proposed mitigation measure document	Relevant Core Strategy policies	Were the mitigation measures implemented?
Include landscape guidance in AAP	Pear Tree / Northern Gateway Safeguarded Land; Southfield golf course (if chosen for housing)	Work on the Pear Tree/ Northern Gateway was put on hold pending the outcome of the Core Strategy Examination. A new start date for the AAP has not yet been scheduled. Landscape guidance will be included. Southfield Golf Course was not chosen for housing.
Consideration of potential land requirements for sustainable drainage.	Summertown safeguarded land; Barton safeguarded land	A groundwater recharge study was carried out for Peartree and Summertown in August 2009 (CD15/13). The groundwater recharge study was requested by Natural England to ensure that neither Peartree or Summertown would have an adverse effect on the hydrology of the SAC. No such report was undertaken for Barton since the site is outside the area of potential risk for the SAC. However, sustainable urban drainage systems (SUDS) will be addressed in the Barton AAP.
In conjunction with Natural England, assess the likely effect of the proposal on the Lye Valley SSSI and adjoining areas of nature conservation interest, and the likely effectiveness of mitigation measures, before the Core Strategy submission document is completed	Southfield golf course (if chosen for housing)	Ecological and hydrological reports for Lye Valley SSSI were prepared in October 2007 (CD15/6 – CD15/7). These were instrumental in confirming that no housing should be built at the site.
Detailed modelling of proposed drainage systems will be required at the application stage to demonstrate that no increase in run off will be achievable.	Southfield golf course (if chosen for housing)	Southfield Golf Course was not chosen for housing

Addendum to the Initial SA Report of March 2008

The addendum to the SA report of March 2008 focused on the impacts of the proposed South Oxford Strategic Development Area which had been included in the South East Regional Spatial Strategy. It found that the SDA would have overall positive impacts, but that it was likely to increase

air pollution on routes into the city. It recommended that the Core Strategy should promote a hierarchy of citywide and local movement networks based on sustainable modes of transport, and prioritising integrated accessibility and interchange improvements at Cowley Primary District centre.

The SA also identifies that development could contribute to congestion on local roads, but that up-to-date transport modelling data would not be available until Oxfordshire County Council's Central Oxfordshire model was in place; and that the County Council was in the process of carrying out a review of school capacity in Oxford, so it was not possible to assess the SDA's impact on facilities in Oxford at the time. The SA recommended that the transport model should be used when it became available to assess the potential traffic generation on roads within the City, and that appropriate mitigation measures could be implemented by means of an Area Action Plan. It also noted that further research on school capacity was needed, and should inform the Core Strategy submission document and any subsequent AAP.

Oxfordshire County Council modelled traffic in the South Oxford SDA in February 2009 (CD8/10). The future of the South Oxford SDA was put in doubt when the Treasury Solicitor decided not to contest legal challenges to the South East Regional Spatial Strategy relating to the SDA. The Secretary of State revoked Regional Spatial Strategies in July 2010. Although a subsequent legal challenge means that they are still temporarily extant, the South Oxford SDA is unlikely to progress soon, and no further work on school capacity has been carried out.

Final SA Report of September 2008

The final SA report recommended some additional mitigation measures associated with the South Oxford SDA. These again referred to transport modelling, although they noted that the South Oxfordshire Core Strategy was at a less advanced stage of preparation than the Oxford Core Strategy, making it potentially difficult to identify a full package of transport mitigation measures. It also noted that the Secretary of State's Proposed Changes to the draft South East Plan indicated that a Green Belt review would be required to accommodate the SDA, and that this would be done collaboratively with South Oxfordshire District Council. Again, as noted above, these requirements have been put in doubt by the expected abolition of the Regional Spatial Strategy.

Addendum to the Final SA Report of April 2009

The Inspector appointed to examine the Oxford Core Strategy raised some initial concerns about the submitted document, and asked the City Council to produce more detailed explanation and specific guidance. In response, the City Council produced a set of proposed changes to the Submission Core Strategy. These changes added more detail but did not make any fundamental changes to the original strategy. The SA report of April 2009 considered only those proposed changes that could have significant impacts that had not previously been appraised:

- CS1: Hierarchy of centres
- CS5: West End
- CS6: Northern Gateway
- CS7: Land at Barton

The only significant mitigation measures proposed by the SA relate to CS7: "Provide a wildlife corridor along Bayswater Brook for recreational and biodiversity interest; Conserve or relocate

allotments and football ground". These measures are being integrated into the emerging Barton Area Action Plan.

Inspectors' report of December 2010

The SA reports were part of the evidence presented by Oxford City Council at the Examination stage. Planning Inspectors David Fenton and Stephen J Pratt reviewed the reports and concluded that

"Alongside the preparation of the DPD the Council carried out a parallel process of Sustainability Appraisal (SA) (CD4/1). An Addendum was subsequently prepared (April 2009) to consider the relevant changes to the plan introduced by the Revised Submission Document (CD4/2). I am satisfied that these documents meet the requirements of the SA regulations. They provide a clear audit of the process by which the Council reached its preferred strategy.

The SA must also fulfil the requirements of the European Strategic Environment Assessment (SEA). In response to criticisms that the SA did not meet the requirements of the SEA Regulations in respect of the historic environment, and the view that the SA might not therefore be legally compliant, the Council commissioned an external audit of the SA from sustainability consultants. (Appendix 2, CD16/8) That review concluded, in general terms, that the SA fulfils the SEA Directive with the possible exception of its monitoring requirements.

Oxford, particularly its central area, is undoubtedly an area of exceptional historic quality and international importance and it is somewhat surprising that the SA does not give the historic environment a greater profile. .. Nevertheless, I am not persuaded that the deficiencies discussed at the hearings are so fundamental, individually or cumulatively, as to significantly bring into question the adequacy or legality of the SA, and in turn lead to the Core Strategy being found unsound. "

The Inspectors' report recommended some limited changes, including support for school provision at West End, Barton and potentially Summertown; strengthening of Policy CS18 on the historic environment; amendments to the range of students eligible to occupy new purpose-built student accommodation; and changes to the way the Northern Gateway and land at Barton are illustrated on the Proposals Map. The report notes that *"None of these changes should materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken."*

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

As was discussed in Section 2, successive rounds of SA report were prepared and made available to statutory consultees, neighbouring local authorities and the public as the Core Strategy evolved. All the documents were put on Oxford City Council's website. CDs of the SA were mailed to the statutory consultees at each stage, although at scoping report stage the consultation letter included a website link. Overall, few responses to these reports were received. The responses, and changes made to the SA and Core Strategy in response, are discussed below.

Scoping report of July 2005

Consultation on the scoping report was from 31 January to 14 March 2006. The following organisations were consulted regarding the scoping report:

- Countryside Agency
- English Nature
- English Heritage
- Environment Agency
- GOSE
- South East England Regional Assembly
- Oxfordshire County Council
- Cherwell District Council
- South Oxfordshire District Council
- Vale of White Horse District Council
- West Oxfordshire District Council

Oxfordshire County Council, English Nature (now Natural England) and the Environment Agency responded with a range of relatively minor recommendations. The comments received were taken into account and used to inform subsequent issues of the Scoping Report relating to other Development Plan Documents and Supplementary Planning Documents. Key changes made as a result of these comments are outlined below:

- **Other relevant plans, policies, programmes & sustainability objectives:** addition of 'Code for Sustainable Homes'; Review of Waste Strategy 2000 Consultation Document (DEFRA Feb 2006); Countryside and Rights of Way Act 2000; Thames Waterway Plan (River Thames Alliance); Catchment Abstraction Management Plan.
- **Baseline information:** Addition of indicator 2 – development on previously developed land; indicator 5 – percentage of population of working age claiming key benefits; indicator 6 – proportion of pupils achieving 5 GCSEs A* - C or NVQ equivalent; indicator 7 – level of domestic burglaries, violent offences and vehicle crimes; indicator 12 – emissions of greenhouse gases (CO² estimates and Kyoto/UK Government targets); indicator 13 – UK BAP

species found in Oxford; indicator 14 – information regarding Local Nature Reserves; indicator 18 – per capita consumption of water; indicator 19 - energy use.

- **Sustainability Appraisal Framework:** Amend Sustainability Appraisal Framework objective 18 by adding reference to soil so that it reads: ‘To maintain and improve water **and soil** quality and to achieve sustainable water **and soil** resource management.’

Initial SA Report of March 2007

Only Natural England, the Environment Agency and GOSE responded to the Initial SA Report. Natural England's response of 18 May 2007 to the Initial SA Report was broadly positive, but it expressed concerns about the Southfield Golf Course housing option and recommended further studies in line with the recommendations of the Initial SA Report:

"We would conclude that these sites [east and west golf course] are unlikely to be sustainable options. Development on either of these sites would go against the preferred option for biodiversity that has been put forward in the plan. However we cannot make a proper judgement on the potential impacts of development on the interest features of the Lye Valley SSSI and on the surrounding areas of biodiversity interest without a full ecological and hydrological survey. We would advise that these sites should only be brought forward if it can be demonstrated to Natural England that the proposals will not have adverse impacts on the interest features of the SSSI and the surrounding areas of high ecological value."

As was noted at Table 3.1, ecological and hydrological reports were prepared for Lye Valley SSSI in October 2007 (CD15/6 – CD15/7), and were instrumental in confirming that no housing should be built at the site. This removal of a site for a large number of new homes from the plan contributed towards the decision to adopt a lower housing target in the submitted plan.

The Environment Agency requested clarification on what each of the options was being assessed against, particularly for those options that were preferred approaches, while GOSE commented on the lack of a ‘business as usual’ option in many cases. The final SA Report was amended to clarify which of the options was the business as usual (i.e. continuation of the Local Plan policy approach), and a business as usual option was added where this had been omitted.

GOSE commented that where options were regarded as equally acceptable, care would be needed to explain how the options in the submission version of the DPD were selected. A new table was added to the final SA Report to explain the policy changes between the Preferred/Further Preferred Options and the proposed submission document. This included an explanation of how the options in the proposed submission document were selected in cases where all the options were considered to be equally acceptable at Preferred Options stage.

Addendum to the SA Report of March 2008

No substantive comments were made on this report.

Final SA Report of September 2008

English Heritage, Natural England and Worcester College/Kier Developments sent in responses that related specifically to the Final SA Report, and the Oxfordshire City and County Archaeological Forum commented critically on how archaeological issues had been dealt with in both the Core Strategy and the SA. The Statement of Representations Received (CD2/2) summarises these representations as follows:

"The Oxfordshire City and County Archaeological Forum claim that, in respect of the historic environment, the Sustainability Appraisal, which is an integral part of the Strategy, falls well short of adequately complying with the legal requirements of the information that must be required under UK SEA Regulations reflecting EU SEA Directive 2001/42/EC. As a result, the Forum considers that the Core Strategy is deficient in many respects with regard to how far it would meet one of its key objectives, which is to conserve Oxford's exceptional historic environment which is of international importance. English Heritage does not raise such significant concerns about the SA, but comments that there appears to be no indication of monitoring in relation to impacts upon the historic environment, which could be significant and need to be resolved."

Although no changes were made to the SA for the Core Strategy in response to these representations, these comments and discussions at the Examination led to a meeting being held with representatives of the Oxfordshire City and County Archaeological Forum, and the addition of more detail regarding the city's heritage to the Core Strategy itself as part of the Proposed Changes published in April 2009. The City Council's Heritage and Specialist Services team are producing a Heritage Plan which will advise on various aspects of the historic environment including archaeological strategy, conservation areas and guidance on the skyline, setting and views of Oxford.

Addendum to the Final SA Report of April 2009

No substantive comments were made on this report

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

Different alternatives (or options) were considered at different stages of the Core Strategy development process, and were assessed and compared as part of the SA process. Oxford City Council's Examination statement (CD16/8) explains how options were developed, assessed and chosen during the development of the Core Strategy. The background paper on links between the stages of DPD production (CD5/1) shows the evolution of, and consultation outcomes of, the Core Strategy policies from issues and options, to preferred options, further preferred options and submission document. The Final Sustainability Appraisal of September 2008 describes what options were rejected early in the SA process and not subject to full appraisal, what other options that were subject to full appraisal, and the reasons for choosing the 'preferred options' of the SA.

The range of options considered was constrained by Oxford's status as a growth point and Regional Hub, the lack of available land, the Green Belt, the flood plain and nature conservation designations. Options that were *not* considered included options contrary to national guidance and emerging regional policy, and policies that were already covered in the adopted West End Area Action Plan. Table 5.1 shows, for each Core Strategy topic, what options were considered in the SA and, in blue shading, what options were finally chosen for the Core Strategy. In the final column, it summarises the SA's comparison of the options.

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

Key:
AO1, AO2 etc. – alternative options to the preferred option PO
O1, O2 etc. – options considered, with no one preferred option
PA = preferred approach, with no reasonable options
PO = preferred option from the SA process
blue highlighting = option chosen for inclusion in the final Core Strategy

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
Housing growth	<ul style="list-style-type: none"> • O1 – Further infill developments and sub-division of family houses into flats throughout the city • O2 – Identifying certain areas where higher density housing could be promoted • O3 – Allowing some existing employment sites to be redeveloped for housing • O4 – Allocating some Safeguarded Land for housing • O5 – Allowing some other greenfield land within the City to be used for housing • O6 – Seeking to review the Green Belt 	<p>O1 and 2 seem the most sustainable. However, O1 will not be able to satisfy the need for more housing and is unlikely to meet housing targets in Oxford. O2 will help to reduce the need for housing on greenfield sites, but it may not be possible to introduce higher densities in many areas due to Oxford's historic environment and view cones. O3 would help to meet housing needs, but many of the environmental impacts are unclear because they depend on the location and type of use of the employment sites to be redeveloped. The redevelopment of existing employment uses would</p>

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	<p>boundary outside the City</p> <p>Chosen option: A combination of O1, O2, O4 and O5. In view of the expected abolition of the Regional Spatial Strategy, O6 could only be implemented if adjoining Districts propose Green Belt reviews through their LDF's.</p>	<p>represent a loss in jobs, economic growth and competitiveness across Oxford. O4, O5 and O6 would lead to loss of Greenfield land, increase flood risk and jeopardise biodiversity. They would also increase traffic, pollution, and affect water and soil quality.</p> <p>The City and District centres, which include the West End strategic site, were considered suitable for higher density housing. However, in other residential parts of the city, outside the City and District Centres, an approach that favoured higher density developments was not pursued due to environmental constraints and the need for a balanced mix of housing types.</p>
Employment	<ul style="list-style-type: none"> • O1 – Relaxing existing protection of key employment sites • O2 – Releasing Safeguarded Land for employment use • O3 – Releasing Green Belt land outside the City for employment use 	<p>O1 would help to meet local housing needs and associated services, and would not affect undeveloped green areas, but evidence from the employment land review suggested that these sites were needed in order to sustain Oxford's economic potential. O2 was the preferred option, based on the evidence from the employment land review which suggested that a strategic employment site of around 17ha should be brought forward in order for Oxford to continue its economic growth. The South East Plan did not provide a clear steer as to whether employment land should be incorporated into the South Oxford Strategic Development Area (O3).</p>
Level of housing growth	<ul style="list-style-type: none"> • PO - Plan for predicted population growth (550 dwellings per annum (dpa) over 20 years) • AO1 – Exceed the predicted population growth (>550 dpa) • AO2 – Continue to meet the target in the Oxfordshire Structure Plan/ Oxford Local Plan (433dpa) • AO3 - Meet the housing target set out in the draft South East Plan (350dpa) 	<p>The PO is the most sustainable option, and scores more highly than O2 and O3 in meeting housing need and sustaining mixed communities. During most of the SA process, Oxford's housing target had yet to be finalised in the South East Plan, so the Core Strategy needs to be flexible enough to reflect.</p>

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	Chosen option: 400dpa	
Timing of housing delivery	<ul style="list-style-type: none"> • O1 – Manage housing supply on identified sites across the Core Strategy period • O2– Allow housing to be delivered on identified sites as soon as they are available 	O2 would be unlikely to lead to a sustainable and stable level of housing growth throughout the plan period. Unmanaged growth could lead to an overprovision of dwellings early in the Core Strategy period. O1 is consistent with the “Plan, monitor and manage” approach of national planning guidance.
Mix of housing	<p>PO - Provide a balanced mix of housing across Oxford, with higher density/ smaller units in the City and district centres</p> <p>AO1 – Deliver higher density/smaller units throughout Oxford</p> <p>AO2 – Leave the market in all cases to determine the appropriate mix and densities</p>	Larger strategic sites provide more opportunities to secure the appropriate infrastructure to support housing than small infill development. Positive impacts associated with the chosen option include encouraging urban renaissance , supporting vibrant communities and helping to meet local housing needs. Most of the negative impacts identified, such as increased pressure on water resources and air quality, would be likely to arise wherever the housing is located in a compact city like Oxford.
Affordable housing from residential development	<ul style="list-style-type: none"> • PO - Residential developments on qualifying sites should provide 50% affordable housing on site • AO1 – 60% affordable • AO2 – 40% affordable but all would be social rented housing • AO3 - 50% of residential floorspace rather than 50% of all dwellings 	AO1 would lead to the highest proportion of affordable but could result in fewer housing schemes coming forward due to reduced land values. It may also need to be reduced to prevent schemes becoming unviable. AO2 is least sustainable as it does not contribute enough to housing needs.
Affordable housing from commercial development	PA - Continue to provide affordable housing from commercial development	This was assessed in the SA for Affordable Housing SPD.
Student accommodation provision	<ul style="list-style-type: none"> • PO –Require increases in academic floorspace to be matched by an increase in purpose built accommodation; students living outside university accommodation to reduce to 2,500 per university in 2016 and 2,000 by 2026. • AO1 – As above but without the second condition 	The PO is the most sustainable as student housing can be built to higher densities than ordinary residential accommodation, thus making efficient use of land. Providing more purpose built accommodation would also free up other residential properties and help to reduce the student imposed skew on rental values
Gypsy and traveller	PA – Set criteria which will form a framework for site allocations through	Criteria should ensure that provision of gypsy and traveller accommodation

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
accommodation	the Site Allocations DPD.	would be provided in a sustainable location.
Building on Oxford's economic strengths	<ul style="list-style-type: none"> • PO – Provide space for science/ technology, education, biotech and spin-off companies from the universities and hospitals. Build on Oxford's strengths. • AO1 – Promote greater diversity in the range and type of employment uses • AO2 – Allow the market to determine the range and type of employment uses 	The three options would have broadly similar impacts, but AOs 1 and 2 would not build so effectively on Oxford's knowledge based economy. AO1 might, however, be more effective in promoting a broad range of employment that would better meet the needs of those currently unemployed.
Protecting Oxford's employment sites	<ul style="list-style-type: none"> • PO - Protect key employment sites. • AO – Allow the release of key sites to other uses 	The PO would be the most sustainable. Several former employment sites, particularly in the canal corridor, have recently been developed. If Oxford's economic prosperity and diversity is to be maintained, a range of employment sites must be protected.
Appropriate economic growth	<ul style="list-style-type: none"> • PO - 'managed growth' (one reserve site 17.5 ha, West End 2ha, new jobs created 4,500). • AO1 – minimal growth (no new allocations, limited amount in West End, new jobs 1,000) • AO2 – medium growth (one reserve site and urban extension 37.5 ha plus West End) • AO3 – 'higher growth' (two reserve sites and urban extension 57.5 ha plus West End, new jobs created 12,500). 	AO1 would not meet Oxford's forecasted need for employment land. The provision of new employment land must be balanced with new housing provision, else more commuters will be attracted to Oxford: in this regard, AO3 would have significant impacts by generating traffic and developing on greenfield land. AO2 is the same as the PO within the city boundary, but proposes an urban extension outside the city boundary, which is beyond the scope of the plan.
Sustainable tourism growth	<ul style="list-style-type: none"> • PO – Improve existing tourist attractions; protect and diversify the range and amount of short-stay accommodation • AO1 – Promote major tourism growth • AO2 – Constrain tourism growth 	AO1 would have significant adverse environmental impacts in terms of traffic growth and air pollution, while AO2 would have adverse economic impacts by preventing the further development of tourism, a key component of the Oxford economy
Location of retail growth	<ul style="list-style-type: none"> • PO - Oxford's retail hierarchy: <ol style="list-style-type: none"> 1. City centre 2. Primary district centre (Cowley centre/ Templars Square); 3. Secondary district centres (Summertown, Headington, 	All three options are sustainable, but the PO has substantial sustainability benefits in terms of providing local jobs and improving accessibility to retail services for Blackbird Leys residents.

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	<p>Cowley Road and new centre at Blackbird Leys);</p> <p>4. Edge-of-centre locations; and</p> <p>5. Neighbourhood shopping centres</p> <ul style="list-style-type: none"> • AO1 – As PO, but treat all district centres the same. • AO2 – As PO, but omit new district centre at Blackbird Leys. 	
Community safety	PA – Work with others on reducing crime, e.g. through good design	PA is considered to be a sustainable approach
Sports facilities	<ul style="list-style-type: none"> • PO - Ensure that residents have access to a variety of indoor and outdoor sports facilities. Priority for new facilities to areas with a significant shortage of such facilities. • AO – Provide fewer but better quality facilities 	Both options could potentially be sustainable, though the AO would not be if it resulted in the loss of a significant number of facilities and people were no longer able to satisfy their sporting aspirations
Green space	<ul style="list-style-type: none"> • PO - Ensure that residents have access to green space in line with recommended standards. Priority for new space to areas with a significant shortage. • AO – Ensure some access, but adopt a lower standard than recommended 	PO has substantial benefits in terms of recreational provision, protecting Oxford’s countryside and historic environment, but could reduce the area available for housing. Green space is an important part of the quality of people’s environment.
Primary care	PA – Ensure provision of high quality convenient local health services	PA is positive as it is likely to make a broader range of facilities accessible to local residents without having to visit a hospital.
Hospitals and medical research	<ul style="list-style-type: none"> • O1 – Continue to locate new medical facilities in Headington. • O2 – As above when this would be the best location, but locate new medical research elsewhere in Oxford • O3 - Restrict new healthcare and medical research facilities to avoid worsening traffic • Chosen option – A combination of O1 and O2 which applies a sequential approach to new medical research facilities starting with existing sites in Headington and Marston 	There is no clear PO: all three options would have different impacts.
Access to education	PA - Ensure provision of the necessary educational facilities	PA likely to have positive benefits in terms of improving educational standards and a skilled workforce
Oxford	PA – Do not allocate land for Oxford	Approach of making the most efficient

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
Brookes University	Brookes University use (except purpose built student accommodation) but improve connections between campuses and promote high-quality design	use of current land, rather than requiring the allocation of additional areas for development, makes a lot of sense in sustainability terms. Could be impact on local transport.
University of Oxford	<ul style="list-style-type: none"> • O1 - Continue to locate new university related development on existing university sites at higher densities, but do not encourage the University's expansion into other areas of Oxford • O2 – As above, but allow expansion into new areas of Oxford for some activities 	There is no obvious PO. O1 could lead to longer journeys with corresponding environmental impacts. O2 could lead to university developments occupying land that could otherwise be used for housing or other essential services and facilities.
Townscape and urban design	PA – Development proposals should protect and enhance Oxford's landscape and townscape character, and contribute to local distinctiveness	Sustainable approach
The historic environment	PA – Conserve/enhance the historic environment. Do not permit development that affects views of Oxford	Sustainable approach but could limit the amount of land available for housing.
Energy and natural resources	PA - Require new developments to achieve the highest standard of sustainable design, construction techniques, and natural resources use and management	PA should achieve high standards for those developments to which it relates. However, the NRIA does not relate to smaller developments.
Flooding	<ul style="list-style-type: none"> • PO – Prevent infill residential development in flood zone 3a but be flexible for other community uses. Do not allow inappropriate development in the functional floodplain. Apply PPS25 sequential approach. • AO - Allow new infill developments in flood zone 3a provided they are on previously developed land and a flood risk assessment shows that the development is safe. Do not allow inappropriate development in the functional floodplain. Apply PPS25 sequential approach. 	The PO is sustainable as it will significantly contribute to ensuring that flooding is not accentuated in Oxford, though this will reduce the opportunities for housing developments in flood risk areas
Waste and recycling	PA - Ensure provision of sites and facilities for aggregate recycling and local waste management and treatment	Sustainable approach
Biodiversity	PA - Ensure that development does not result in a net loss of biodiversity; take	PA, if implemented to its full extent, should result in Oxford's biodiversity

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	opportunities to enhance biodiversity.	resource being maintained and perhaps even enhanced.
Oxford's short term transport infrastructure	<ul style="list-style-type: none"> PO – Reduce car based travel by improving accessibility for public transport, pedestrians and cyclists within Oxford AO - Support significant improvements to car-based infrastructure whilst maintaining other existing transport networks 	The PO is sustainable, while the AO would have significant adverse environmental impacts. In the long term, however, the PO would not provide the level of mitigation required. The PA relating to Oxford's long term transport infrastructure will be needed
Oxford's long term transport infrastructure	PA - Consider innovative approaches to Oxford's transport problems, e.g. rapid transit system, new or enlarged railway station, workplace parking levy, East-West Rail	Given the Highways Agency forecast that the A34 between Didcot and the M40 is likely to become one of the most congested roads in the country over the plan period, one or more of the innovative approaches are likely to be needed for development in Oxford and elsewhere in the county to be sustainable
Hierarchy of centres	<ul style="list-style-type: none"> PA (City centre) – The City centre to be the main location for developments attracting many people and for higher density development; promote renaissance of the West End through an AAP PA (District centres) - District centres should be the location for retail, leisure, employment and other uses serving district-level needs, and for medium to high density development; Cowley centre/ Templars Square to become a Primary District centre; a new mixed-use District centre to be developed at Blackbird Leys Chosen option (proposed changes) – As for City and District Centres PAs, but merged, and with a paragraph on neighbourhood centres 	<p>City centre is a sustainable location for locating developments that attract large numbers of people and should make opportunities for culture, leisure and recreation readily accessible. Development in the West End will encourage an urban renaissance of this area and the more efficient use of land, large areas of which are currently used for car and coach parking.</p> <p>The District centres are sustainable locations for retail, leisure, employment and other uses serving district level needs.</p>
Regeneration areas	PA – Promote regeneration in areas of greatest deprivation, notably Blackbird Leys, Barton, Northway, Wood Farm and Rose Hill	PA would have significant sustainability benefits in terms of improving the existing housing stock, reducing poverty and social exclusion, and encouraging the urban renaissance of these areas.
Brownfield land	<ul style="list-style-type: none"> PO – Development to be allowed on brownfield land subject to other policies in the Core Strategy. No 	No option pursued in full. There is not much difference in impacts between the options. Allowing an earlier start would

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	<p>development on strategic greenfield sites before 1 April 2011</p> <ul style="list-style-type: none"> • AO1 – As above, but allow development on strategic greenfield before 1 April 2011 • AO2 – As above, but no development on strategic greenfield sites before 1 April 2016 • Chosen option – As above, but no development on strategic Greenfield sites will in practice come forward before 2013 	<p>be more beneficial in allowing much needed housing to be provided, whereas a later date might help to encourage more priority to be given to developing brownfield land.</p>
Green belt	<p>PA – The North Oxford Gateway AAP and Site Allocations DPD will consider the potential for any small-scale review of the Green Belt.</p>	<p>Review would be small-scale, so the impacts whether positive or negative are likely to be small-scale, unless the land involved was in a sensitive location.</p>
Pear Tree/ Northern Gateway safeguarded land	<ul style="list-style-type: none"> • PO – Site for mixed use employment including an emergency services centre. An Area Action Plan would bring forward this area. • AO1 – Site for residential and complementary mixed use development. • AO2 – Safeguard from development to 2026. 	<p>The PO would benefit Oxford's economy but would increase air pollution and road congestion unless the Northern Gateway AAP incorporates significant transport mitigation. Pear Tree would not be a good location for housing due to noise and air pollution from the surrounding roads.</p>
Summertown safeguarded land	<ul style="list-style-type: none"> • PO – Site for residential development • AO – Safeguard from development to 2026 	<p>This site is a sustainable location for new residential development and would provide the opportunity to create new areas of public open space and improve footpath links in the Cherwell Valley.</p>
Barton safeguarded land	<ul style="list-style-type: none"> • O1 – Safeguard from development to 2026. • O2 – Site for residential and complementary mixed uses • O3 – Site for hospital and university use. • O4 – Site for employment and mixed uses, for example emergency services. • O5 – Site for commercial/retail development 	<p>There is no PO for this site. Developing the land for housing would help to meet Oxford's housing needs and could provide a new City Park. Hospital/university and employment uses would benefit Oxford's economic prosperity. Employment or commercial/retail development would significantly increase road congestion and pollution. Fewer traffic impacts may occur with medical research that is linked to the Headington hospital sites. Barton is thus probably a more sustainable location for residential or medical research linked to the Headington Hospitals than for employment or retail.</p>

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
Southfield Golf Course – East	<p>O1 – Develop for housing</p> <p>O2 – Do not develop for housing</p>	<p>Southfield East is not as environmentally sensitive as S. West, and is close to existing employment and services. However it is also close to the Cowley Green wedge and the southern part of Lye Valley SSSI. Significant mitigation measures would be required to prevent it having an adverse impact on these sensitive environmental assets</p>
Southfield Golf Course - West	<p>O1 – Develop for housing</p> <p>O2 – Do not develop for housing</p>	<p>The site has ready access to local services but is very environmentally sensitive. Developing it for housing would have adverse biodiversity and landscape impacts, and access to the site would be difficult. These impacts would be difficult to mitigate.</p>
Developer contributions	<p>PA – Developments to be permitted only where necessary infrastructure, services etc. to support them are in place or will be provided when needed.</p>	<p>Sustainable approach that will ensure that necessary infrastructure and services are available to serve new development.</p>
South Oxford Strategic Development Area	<ul style="list-style-type: none"> • PO – Produce a joint Area Action Plan with South Oxfordshire DC for 4,000+ new dwellings, community facilities and other uses. Integrate the new community into the urban fabric of Oxford • AO – Do not produce a joint AAP • Chosen option – SDA not pursued after the Treasury Solicitor decided not to contest legal challenges to the South East Regional Spatial Strategy relating to the SDA. 	<p>The PO would have more benefits for Oxford in terms of objectives such as creating vibrant communities, providing accessibility to essential services and stimulating economic revival in regeneration areas. This would particularly be the case if a joint AAP includes the south eastern part of the City</p>
Blackbird Leys centre	<ul style="list-style-type: none"> • PO – Promote a mixed-use District centre • AO – Promote regeneration in the existing Blackbird Leys centre, but without encouraging its expansion 	<p>The PO would provide more local employment, improve accessibility to a range of services, add vibrancy and act as a focal point for regeneration activities. It should also help to improve links with neighbouring communities.</p>
Access and transport and the SDA	<ul style="list-style-type: none"> • PO – Secure accessibility for the South Oxford SDA through a hierarchy of movement networks based on good bus access and a local network of routes that prioritise walking and cycling. Prioritise access improvements at Cowley Primary 	<p>The PO would provide for a range of travel choices, reduce the need to travel by private vehicle, and increase the opportunities for walking and cycling. It would also provide better access to health and other facilities and services throughout the City. It would also</p>

Core Strategy topic	Summary of options	Summary of findings from options comparison in the SA Report and information from CD16/8
	District Centre. <ul style="list-style-type: none"> • AO1 – As above, but focusing only on bus access • AO2 – As above, but focusing only on walking and cycling, and links to Cowley Centre • Chosen option – SDA not pursued after the Treasury Solicitor decided not to contest legal challenges to the South East Regional Spatial Strategy relating to the SDA. 	contribute towards the SA economic objectives, including economic growth and economic revival of regeneration areas, by improving accessibility and transport links between the SDA and surrounding areas (Blackbird Leys, Greater Leys and Littlemore) as well as the City centre.
Cultural and community development	<ul style="list-style-type: none"> • PO – Protect/enhance existing cultural and community facilities, unless equivalent new or improved facilities, where foreseeable need justifies, can be provided • AO1 – As above, but protect all existing cultural and community facilities • AO2 – Do not protect existing facilities 	The PO is flexible in terms of its approach to potential opportunities for locating new facilities in accessible areas, particularly where there is a deficiency in cultural or community facilities.

In most cases, the preferred, most sustainable option from the SA was also chosen as the basis for the Core Strategy. However in a few cases, the final Core Strategy incorporates a different option from the preferred option from the SA.

- Level of housing growth – the final Core Strategy makes provision for an annual average of 400 dwellings a year. This accords with the target in the South East Regional Spatial Strategy and reflects further work on the evidence base after the Preferred Option stage (e.g. Southfield Golf Course was not taken forward for housing, and the Strategic Housing Land Availability Assessment found that the provision of 11,000 dwellings over a 20 year period was unlikely to be deliverable)
- Timing of housing delivery - given the very high levels of housing need in Oxford, it was decided not to include a policy in the Core Strategy that would have managed housing supply across the Core Strategy period. The Council is treating the housing provision target as a minimum and therefore does not wish to prevent sites from coming forward if they comply with all other relevant policies. Another factor taken into account was that Oxford’s designation as a Growth Point involved some frontloading of housing provision to meet a target of 5,692 dwellings by 2016.
- Student accommodation provision – the alternative option, rather than the preferred option, was taken forward to the final plan. The universities, particularly Oxford Brookes, made a strong case that the proposed targets for further reduction of student numbers living outside university-provided accommodation was unattainable.

- Brownfield land - The SA found little difference between the impacts of the different options. The final Core Strategy incorporates the preferred option. Given that the Core Strategy was only adopted in March 2011, it is clear that no development could take place on the strategic sites before 1st April 2011. In practice, it is unlikely that any development will take place before 2013 at the earliest.
- South Oxford SDA - The submitted Core Strategy included the preferred option from the SA, but this policy was deleted from the Core Strategy before adoption following the Government's decision not to contest legal challenges to the South East Regional Spatial Strategy relating to the South Oxford SDA. It therefore became evident that there was no realistic prospect of the SDA coming forward in the short-medium term.

6. MEASURES TO BE TAKEN TO MONITOR THE SIGNIFICANT SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE CORE STRATEGY

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

A detailed framework has been prepared to monitor the implementation of Oxford’s Core Strategy: the results of this monitoring are expected to be published as an Annual Monitoring Report in December each year. This framework covers most of the significant environmental, social and economic effects of implementing the strategy. Table 6.1 shows this monitoring as those indicators labelled '(CSx)'. The SA and HRA processes have suggested a limited number of additional monitoring indicators. These are shown highlighted in blue at Table 6.1, along with an explanation of why monitoring of these indicators is necessary.

Table 6.1 shows

1. monitoring indicators that aim to measure likely effects of the core strategy identified in the SA and HRA for the Core Strategy,
2. who would monitor the indicators and how frequently,
3. targets (positive) that the Core Strategy will try to achieve,
4. thresholds (negative) of impacts that would trigger remedial action by the City Council, and
5. information about why the indicator has been proposed.

Table 6.1. SA monitoring framework

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
Population	Total no. residents	Oxfordshire County Council, Office of National Statistics	n/a	n/a	Context data on which SA predictions are based
	No. students	Univ. of Oxford, Oxford Brookes Univ.			
1. Flooding	Permissions contrary to Environment Agency advice on flooding grounds (CS11)	Oxford City Council, annual	0% approved contrary to formal objection		Significant areas of Oxford are in flood zone 3 – the Strategic Flood Risk Assessment for Oxford noted that about 5000 properties are at risk of flooding in Oxford
	% developments accompanied by a Flood Risk Assessment (CS11)		100% of developments of 1ha in flood zone 1; 100% of developments in flood zone 2 or above		
3. Housing	Total no. of net additional dwellings in Oxford (CS22)	Oxford City Council, annual	Relative to 2006/07: 5692 by 31 March 2016 8000 by 31 March 2026		The Core Strategy's housing allocation for Oxford is 8,000 to 2026.
	No. students living outside university accommodation (CS25)		All increase in student numbers to be met by increase in purpose-built student accommodation		If >3000 students live outside university-provided accommodation, no additional planning permission given for additional teaching or administrative accommodation
	Mix of housing completed by house size (CS23)	Oxford City Council, annual	95% of schemes to comply with Balance of		

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
			Dwellings SPD		
	Improve standard of housing (CS3)	Oxford City Council	100% of homes in regeneration areas exceed Decent Homes Standard		
	% of new-build housing on qualifying sites achieving Building for Life criteria (CS18)	Oxford City Council, annual	95% to achieve level 14 or above		
2. / 4. / 6.–10. Urban renaissance, health, education, crime, vibrant communities, services and facilities, culture, leisure, recreation	Publicly accessible open space, outdoor sports and recreation facilities (CS21)	Oxford City Council	5.75 hectares / 1000 population		The SA noted that all of these topics would be positively affected by the Core Strategy. Most of them are interrelated (e.g. health is related to provision of health facilities; education to schools) so they are considered jointly. Provision of many of these services are outside the remit of Oxford City Council. Oxford's most deprived ward in health deprivation terms was Carfax; it rated in the worst 1% in the country.
	Quality of existing green spaces (CS21)	Oxford City Council	Renew and increase Green Flag status for parks in Oxford		
	Access to community facilities (CS20)	Oxford City Council,	100% of developments that result in the loss of a community facility to make equivalent alternative provision or improvements to existing provision (unless the existing use is and will continue to be redundant)		
	Index of health deprivation for Oxford's 'super output areas'	CLG, periodic	Improve ranking, particularly of Carfax		
	Density of residential	Oxford City Council	City and district centres		

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
	development (CS1)		to deliver higher density residential development than within the wider District Area		
	Provision and improvement of local primary healthcare facilities (CS15)	Oxford City Council, annual	As per CS15 monitoring		
	Provision and improvement of local educational facilities (CS16)		As per CS16 monitoring		
	Provision of other social infrastructure (CS17)		As per CS6, CS7, CS14, CS16, CS17, CS20, CS21 and CS22		
	% of new developments that comply with 'Secured by Design' (CS19)		100%		
5. Poverty, regeneration areas	% affordable housing completions (CS23)	Oxford City Council, annual	50% on qualifying sites 150/yr in 2008-10 200/yr in 2010-12		Lack of affordable housing is a significant problem in Oxford
	Extent of deprivation in Oxford relative to all areas nationally (CS3)	CLG, periodic	Reduce number of super output areas in Oxford in the 20% most deprived in England		Regeneration of Oxford's deprived areas – particularly at Barton, Blackbird Leys, Northway, Rose Hill and Wood Farm – is a priority of the Core Strategy.
	No. households living in temporary accommodation (CS24)	Oxford City Council	698 in 2008/09 577 in 2009/10 536 in 2010/11		Oxford compares poorly with other

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
	Timely progress of a regeneration plan for each of the regeneration areas in conjunction with other departments (CS3)	Oxford City Council	Timetable to be agreed corporately		areas of the South east in terms of overcrowded households. Almost one-third of Asian or Asian British people in Oxford live in overcrowded households.
11. / 12. / 15. / 19. Air pollution, climate change, road congestion and pollution, energy efficiency, renewable energy	NOx levels in Oxford, particularly at Binsey and at Oxford Meadows SAC near the A34	Oxford City Council, periodic; also through Northern Gateway AAP	Progressive decrease in NOx, NO and ozone levels	30µg/m3 NOx (threshold level for vegetation) triggers action	Air quality at Oxford Meadows adjacent to the A34 was identified as a possible problem in the HRA
	Inner and outer cordon traffic counts (CS14)	Oxfordshire County Council	Inner cordon: no growth Outer cordon: no more than 0.2% average annual growth		Air Quality Management Area covers the whole city Increased congestion and air pollution was identified as a key likely impact of increasing people living and working in Oxford
	% people travelling to work by private motor vehicle	Census, every 10 years	No increase in current level of 43.3%		
13. Biodiversity	Condition of Port Meadow SSSI; integrity of Oxford Meadows SAC	Natural England		significant 'in combination' impact	Core Strategy should not, 'in combination', significantly affect the integrity of Oxford Meadow SAC
	Change in populations of biodiversity importance (CS12)	Thames Valley Environmental Records Office	No net reduction in BAP priority habitats and species, i.e. 96 priority species, 326.7 hectares priority habitat		
	Change in areas of biodiversity importance (CS12)		No net reduction in SAC (177.1ha), SSSI (278.2ha), CONS (63.5ha), SLINC (202.5ha), LNR (11.5ha,		

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
			3 sites), RIGS (2)		
14. Countryside and historic environment	No. heritage assets at risk (CS18)	Oxford City Council, annual	No net increase from 0 Registered Parks and Gardens, 0 Conservation Areas, 1 Listed Building, 2 Sched. Monuments		Oxford's heritage contributes to the quality of life of its residents, and helps to support its economy, including tourism. The proposed monitoring aims to respond to points made at the Core Strategy Examination.
	No. developments involving demolition or substantial demolition of a listed building, or of a building or structure that contributes to the character/appearance of a Conservation Area (when contrary to officer's/English Heritage recommendation) (CS18)		0		
	Development of a Heritage Plan for Oxford City (CS18)		Completion by 2015		
	Length of footpaths, bridleways and permissive rights of way per person	Oxfordshire County Council	No decrease		Footpaths and bridlepaths allow access to the countryside and to services, and support good health
	Inappropriate development in the Green Belt (CS4)	Oxford City Council, annual	None unless specifically allocated by the LDF		By allocating sites in the LDF to meet identified needs, pressures for speculative development on Green Belt or other greenfield land should be reduced.
	% of new dwelling completions on previously developed land (CS2)		2009/14: 90+% 2014/26: 75+%		
	Employment developments on previously developed land (CS2)		No development on greenfield unless specifically allocated		By allocating sites in the LDF to meet identified needs, pressures for speculative development on Green

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
					Belt or other greenfield land should be reduced.
16. / 17. / 19. Natural resources, waste generation and disposal, energy efficiency and renewable energy	Water use per person per day	Thames Water	130 litres, from 164 litres in 2004		South East Plan SA has identified water use as being a key problem in the South East.
	Developments complying with NRIA requirements (CS9)	Oxford City Council, annual	100% compliance	NRIA minimum standard is 1 pt	
	Average % energy produced by on-site renewables in new developments (CS9)		20% on-site renewable energy from qualifying sites throughout the plan period		Oxford's Natural Resource Impact Analysis SPD sets out standards for new developments in terms of energy efficiency, renewable and low-carbon energy, water consumption and materials
	Residential waste per household (CS10)	Oxfordshire Joint Municipal Waste Partnership	2008/09 – 725kg 2009/10 – 723 kg 2010/11 – 715 kg		Although the Core Strategy has no direct impact on waste generation and recycling, it has indirect impacts in terms of site layout, recycling of construction materials etc.
	Rate of total household waste recycling and composting in Oxfordshire (CS10)		40%+ by 31 March 2010 45%+ by 31 March 2015 55%+ by 31 March 2020		
18. Water and soil quality	Quality of Oxford's rivers	Environment Agency, every 6 years as part of RBMP	Achievement of 'good' status by 2027 at the latest		The Water Framework Directive requires all inland waters to achieve at least 'good status' by 2015, or if this is not possible, then 2021 or 2027. SUDS are a key way of achieving this in an urban environment.
	Incorporation of Sustainable Urban Drainage System in all relevant new developments	Oxford City Council			
20. Skilled workforce, high employment,	Total no. new Use Class B jobs created in Oxford (CS27)	Oxford City Council, annual	7500+ by 2026		Oxford has an important role to play in the future prosperity of the area and further economic growth is envisaged to reflect its position
	% economically active	NOMIS, quarterly	Increasing		

Topic (by SA objective)	1. Indicator	2. Who monitors, how frequently	3. Target	4. Threshold for remedial action	5. Reason for monitoring
economic growth, economic innovation	New retail, office and leisure development in the City Centre and district centres	Oxford City Council, annual	As per targets set in the Core Strategy monitoring framework		
	Average length of stay	Oxford City Council, sporadic	Increasing		Most sustainable tourists are those that stay longer and spend more
	Average spend		Increasing		
	Supply of short-stay accommodation (CS32)		Net increase		

7. HABITATS REGULATIONS ASSESSMENT

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

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

The HRA for the Oxford Core Strategy was carried out in house with support by Levett-Therivel sustainability consultants and in consultation with Natural England. The legal requirement for HRA of plans arose in early 2006, when the SA/SEA scoping report for the Oxford Core Strategy had already been prepared. The screening stage of the HRA was carried out in 2007, and ruled out most of the impacts of the Core Strategy from the need for further analysis. However it found that the Core Strategy could have significant impacts on the Oxford Meadows Special Area of Conservation (SAC) with regard to air pollution, water quality, the hydrological regime and recreational pressure. This meant that the appropriate assessment stage was required.

The appropriate assessment stage of the HRA looked further at the four outstanding issues. It concluded that air quality impacts on the SAC would not be significant, in part because background air quality is expected to improve in the future. It concluded that water quality impacts on the SAC would not be significant, in part because effluent from Oxford's wastewater treatment work discharges downstream of the SAC, and in part because other measures can control these impacts. Development at Peartree/Northern Gateway was identified as having a possible impact on the hydrology of the SAC, but would be mitigated through a Local Plan policy on drainage and run-off¹.

A report by the Environment Agency also suggests that the way that water in the River Thames is controlled makes it unlikely that runoff from the proposed employment development at Peartree would significantly affect the SAC's hydrology. In terms of recreational impacts, the Core Strategy's proposed strategic housing sites were found to be far enough away from Port Meadow to limit the amount of additional recreational pressure on the SAC; and the development and improvement of green areas in other parts of Oxford through the Core Strategy was felt to further reduce this pressure. The resulting HRA report of September 2008 (CD4/4) concluded that the Core Strategy,

¹ This has now been superseded by Core Strategy Policy CS11 on flooding which states that "*Unless it is shown not to be feasible, all developments will be expected to incorporate sustainable drainage systems or techniques to limit run-off from new development, and preferably reduce the existing rate of run-off*"; and Core Strategy Policy CS12 on biodiversity, which states that "*International and national sites (the SAC and SSSIs): These must be protected from any development that will have an adverse impact.... Opportunities will be taken (including through planning conditions or obligations) to: maintain, restore and add to the network of unimproved flood meadows within the Thames and Cherwell flood plains...*"

with the mitigation measures proposed, would not have a significant impact on the integrity of any Natura 2000 sites.

In response to comments by Natural England, mainly in relation to hydrology and air quality issues, an updated HRA was produced and submitted to the Examination in July 2009 (CD4/5). This updated report also concluded that the Core Strategy would have no significant effects on site integrity. The City Council further considered the impacts on Oxford Meadows SAC of siting about 200 homes at Northern Gateway. This would particularly affect recreational impacts, since the Northern Gateway site is located about 500 metres from the SAC, so recreational pressure could potentially increase as a result of the housing. An addendum to the HRA, specifically relating to recreational impacts, was included within the Further Proposed Changes to the Submission Core Strategy, published in April 2010 (CD1/3). Subsequent to this, the City Council, Natural England and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) submitted a joint statement to the Examination in September 2010 (CD16/77). This included agreed wording to be inserted into the Core Strategy to ensure that there will be no adverse effects on the integrity of the Oxford Meadows SAC from development at the Northern Gateway.

The Inspectors referred to the HRA in their report. They summarised the HRA process, and recommended the need for some further work at a more detailed planning stage for the Northern Gateway and Summertown areas, to confirm that the Core Strategy would not have a significant impact on the Oxford Meadows SAC (para. 3.12). In particular, they concluded:

"None of the land within the indicative boundary [of the Northern Gateway] has intrinsic ecological merits that would prevent development being considered here (CDs 14/23 and 14/26). Natural England has indicated that it is satisfied that the HRA shows that some development could go ahead without an adverse effect on integrity of the Oxford Meadows SAC, but an adverse effect on integrity from the proposed levels in the strategic allocations cannot be ruled out at this stage. It is seeking a strengthening of the Core Strategy to make specific reference to the issues to be addressed at the AAP stage and the Council's commitment not to pursue an option that would give rise to significant impacts on the SAC that could not be fully mitigated. That reflects the detailed studies undertaken (CD15/13 to 15/15) and I recommend the wording be added to the policy, which cover issues of water hydrology and air quality. I have no reason to believe that hydrology and air quality issues are insurmountable, but they will need to be addressed firmly in any master-planning work that is carried out. (para. 4.148)..."

In order to make the Core Strategy sound, the following changes should be made:

- i. The addition of the following to Policy CS6: "Development is dependent upon the securing of measures designed to mitigate the impact on the local and strategic road networks, acceptable to both the Highways Agency and Highways Authority. The mitigation measures must be implemented in accordance with the agreed phasing, with full implementation prior to the occupation of the final development phase." and*
- ii. The addition to the policy of the wording in paragraph 3.1 of the additional statement by Natural England, dated 7 September 2009, reference M8NG/CR28/1. (para. 4.154)*

Part ii of this recommendation was incorporated into the Examination Changes at Appendix A2 of the Inspectors' report.

The Core Strategy has incorporated these requirements as part of the Delivery and Partnership section for Policy CS6 (Northern Gateway):

“The Council will require the Area Action Plan to be supported by a full hydrological risk appraisal to demonstrate that there will be no change in the hydrological regime of Oxford Meadows SAC, in terms of water quantity or quality. This will form part of an Appropriate Assessment which will be undertaken for the Area Action Plan to meet the requirements of the Habitats Regulations. The current groundwater recharge will be maintained, including the incorporation of sustainable urban drainage systems, such as porous surfacing, grassy swales and infiltration trenches.

The Area Action Plan must also be supported by more detailed air quality modelling and analysis to show that there will not be any localised adverse effects on the integrity of the SAC resultant from construction or increased road trips on roads within 200m of European sites.

The Area Action Plan must also be supported by an assessment to show that there will not be any effect on the integrity of the SAC from recreational pressure arising from the development.

If the results of these further assessments show that part of the Strategy cannot be delivered without adverse impacts on Oxford Meadows SAC, which cannot be fully mitigated, then the plan will only make provision for level and location of development for which it can be concluded that there will be no adverse effect on the integrity of the SAC, even if this level is below that in the strategic allocation”.

Following adoption of the Core Strategy, a final version of the HRA will be published to bring together the previously published material and to reflect the wording incorporated into the Core Strategy.