Examination of the Oxford Local Plan 2045 – Stage 2 Hearings: Statement on behalf of Christ Church

Matter: Matter 14 – The Natural Environment

Issue: Issue 2: Urban Greening Factor – Policy G3

Hearing Date: 08 December 2026 (Morning Session)

The following comments on selected questions in the MIQ's are submitted on behalf of Christ Church (ChCh). ChCh is one of the largest Oxford College's and a significant landowner in the City.

Issue 2: Urban Greening Factor – Policy G3

Q1 **Is it sufficiently clear what is meant by "an appropriate proportion of natural green surface cover" for the purposes of Policy G3? How will the policy be implemented and how will it be effective?**

Q2 **Is it clear to users of the Plan what the submission of a completed Urban Greening Factor assessment would entail? What is the justification for this requirement and is it sufficiently flexible enough to be effective?**

Q3 **Are the requirements set out in Policy G3 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?**

1. Policy G3 is not considered justified, effective or consistent with national policy.

2. It is unclear what is meant by "*an appropriate proportion of natural green surface cover*". The policy does not adequately define this. As a result, it is not clear what level of greening is required without undertaking a separate technical assessment.

3. The requirement for a completed UGF assessment introduces an additional layer of evidence alongside mandatory Biodiversity Net Gain requirements. It has not been clearly demonstrated why this separate assessment is necessary.

4. The policy is likely to be difficult to implement effectively on constrained urban sites where development proposals must balance the delivery of housing and commercial development, infrastructure, access, servicing and other policy requirements within limited site areas. Whilst the supporting text states that applicants have flexibility in how minimum scores are achieved, the policy provides little flexibility where green space losses occur and does not contain the same opportunities for off-site compensation that are available through Biodiversity Net Gain.

5. ChCh is concerned that the policy could unnecessarily constrain otherwise sustainable development opportunities, including schemes capable of delivering wider public benefits such as housing.

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6. Policy G3 duplicates elements of Policies G1, G2 and G4, and the need for a separate UGF assessment has not been demonstrated to be necessary, viable or deliverable across all forms of development in the City. Accordingly, the policy should be deleted, with matters relating to green infrastructure and biodiversity addressed through Policies G1, G2 and G4 and national Biodiversity Net Gain requirements.