

Air Quality Impacts:

Based on the information provided Natural England cannot currently agree that the Plan will not have air quality impacts on the Oxford Meadows SAC, particularly in combination with other Plans and projects in this area. In-combination impacts should be assessed fully in the subsequent Appropriate Assessment.

Chapter 4- A Green Biodiverse City that is resilient to Climate Change

Policy G1- Protection of Green Infrastructure

We welcome the inclusion of a Green Infrastructure policy. GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Natural England welcome the identification and protection of those spaces forming part of the Green Infrastructure core network G1A and G1B as identified on the policies map. However we encourage you to consider the inclusion of existing green infrastructure features such as irreplaceable and priority habitats in addition to ancient woodland, veteran trees and important hedgerows, within the protected network.

We note that there are several site allocations proposed within the plan that will impact on the GI Core network, particularly on G1B assets. G1B assets are identified as those which are supporting the G1A core network and will require re-provision to be provided in the event of any loss. In order to robustly appraise the sites for suitability and ensure that policy G1 is adhered to we suggest that site allocation policies likely to result in losses to the network include an estimate of the likely quantity of sufficient on site GI re-provision required to mitigate for any losses, the type of re-provision required and if it is not possible to provide the re-provision on site, then identification of options/locations for offsite delivery to another part of the network.

Policy G2- Enhancement and Provision of new Green and Blue Features

The plan recognises the opportunity to enhance blue corridors and we welcome the inclusion of a commitment to restore bankside and in-stream habitats and leaving a undeveloped buffer zone of at least 10 metres width. We would encourage you to identify those site allocations where these opportunities exist, and provide details of the buffer zone requirements within each of the allocation policies to ensure that these opportunities are a requirement. This would be particularly beneficial where sites are adjacent to SSSI or SAC sites and would act to enhance and strengthen the existing identified G6 ecological and G1 GI network.

Policy G4- Delivering Mandatory Net Gains in Biodiversity

Natural England welcome the inclusion of a commitment to deliver the mandatory 10% net gain in Biodiversity within local plan policy. However, we encourage you to be more ambitious and consider the shared regional principles for protecting, restoring and enhancing the environment in the Oxford to Cambridge Arc which have been written and agreed by the Arc's local partners and stakeholders.

The principles include the aspiration to deliver biodiversity net gain for all developments of 20% which reflects the Arc's world leading environmental ambitions.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where re-provision of BNG cannot be delivered on site, the plan should set out where this might be delivered elsewhere in the G6

ecological network across the plan area, in a similar way to that proposed within policy G1 for green infrastructure reversion.

Policy G6- Protecting Oxford's Biodiversity Including the Ecological Network

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Natural England welcome the commitment to safeguard key sites within Oxford's ecological network which include Oxford Meadows SAC and the numerous SSSI across the city. We encourage you to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI's and stipulate within the allocation policy that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.

We encourage you to be ambitious in terms of the protection, enhancement and strengthening of the ecological network and suggest that you include a commitment to the protection of irreplaceable habitats and priority habitats such as lowland fen, within the policy wording.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here [Habitats and species of principal importance in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england): BAP identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Natural England encourage you to consider the Oxfordshire Nature Recovery Network and emerging Oxfordshire Local Nature Recovery Strategy. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife.

Local Nature Recovery Strategies (LNRSs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRSs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. They will cover the whole of England and will be developed by Responsible Authorities (RAs) appointed by the Secretary of State, usually at a county scale. Each strategy will:

- Map the most valuable existing habitat for nature
- Map specific proposals for creating or improving habitat for nature and wider environment goals

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- Agree priorities for nature's recovery It is the government's intention that mandatory biodiversity net gain will provide a financial incentive for development to support the delivery of LNRSs through an uplift in the calculation of biodiversity units created at sites identified by the strategy.

LNRSs have also been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area. Given that national guidance on LNRSs and their relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.

Chapter 8- Development Sites, Areas of Focus and Infrastructure

Policy SPN1- Northern Gateway

Due to the close proximity of this allocation to Oxford Meadows SAC, we will require a full Appropriate Assessment to be provided in support of the Local Plan as part of the Habitats Regulation Assessment.

We encourage you to include details in the allocation in relation to the alluvial ribbon that is present in the southern most portion of the site and that this will require further detailed hydrological assessment in relation to the groundwater regime and its connectivity to the SAC. We also encourage you to include the requirement for a buffer strip to be retained between Godstow Road and the Goose Green Meadow area.

We advise that the green infrastructure provided as part of development within the SPN1 allocation be mapped and included within policy G1 green infrastructure core network as it forms part of the mitigation for recreational impacts on the Oxford Meadows SAC and should therefore be protected from development in perpetuity.

Policy SPE1- Government Buildings and Harcourt House

Natural England welcome the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI and that any proposals coming forward will require a hydrological assessment and SuDS. However, due to its proximity to the SSSI and the presence of open mosaic priority habitat at the site and the site's likely high biodiversity value, we are concerned that development here will impact on the wider ecological network to which the SSSI is linked, potentially resulting in the fragmentation of linkages. Further information should be provided to evidence whether this site is deliverable.

Policy SPE3- Headington Hill Hall and Clive Booth Student Village

As with policy SPE1, we welcome the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI and that any proposals coming forward will require a hydrological assessment and SuDS. There are pockets of land within this allocation that are deciduous woodland priority habitat and are allocated as part of the G1 core network, therefore protection should be afforded to those areas that are present on the site. Re-provision should be delivered onsite in the first instance or to another part of the network.

Policy SPCW3- Manor Place

As with the above policies, we welcome the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI and that any proposals coming forward will require a hydrological assessment and SuDS. There are pockets of priority habitat located within this allocation which will contribute to the ecological network and the site as a whole will likely be of high biodiversity value given the habitats present here and its location next to the River Cherwell.

We would encourage you to identify the requirement for a buffer strip to be put in place of at least 10m from the River Cherwell as per Policy G2 to ensure that this is clear within the allocation policy.

Policy SPS8- Bertie Place Recreation Ground

Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.

This site is identified as a supporting G1B asset of the protected green infrastructure network and is

in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network

Policy SPS13- Land at Meadow Lane

Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. We encourage you to identify the requirement for a buffer strip to be put in place of at least 10m from the watercourse to the west of the site as per Policy G2 to ensure that this blue infrastructure is maintained and strengthened.

This site is identified as a supporting G1B asset of the protected green infrastructure network and is in close proximity to the SSSI with a likely high biodiversity value particularly in relation to the invertebrate interest present which will contribute to the strengthening and enhancement of the ecological network, therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.

Policy SPS15- Redbridge Paddock

As above, Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.

This site is identified as a supporting G1B asset of the protected green infrastructure network and is in close proximity to the SSSI, contributing to the strengthening and enhancement of the ecological network, therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Due to the potential high biodiversity value of this site and potential for fragmentation of linkages impacting on the SSSI, further information should be provided to evidence whether this site is deliverable.

Policy SPE 6- Churchill Hospital, Policy SPE 7- Nuffield Orthopaedic Centre, Policy SPE 8- Warneford Hospital, Policy SPS 11- Cowley Marsh Depot, Policy SPS 16- Crescent Hill, Policy SPS18- 474 Cowley Road & Policy SPS1 ARC Oxford.

The above allocations fall within the Lye Valley SSSI impact risk zone. The Lye Valley SSSI is a lowland fen spring fed system and is highly sensitive to changes in water quantity and quality. We welcome wording within the allocation policies which states that planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI.

We understand that the council is currently undertaking a hydrological study of the site, which will inform a Supplementary Planning Document which will better inform decision making for planning matters in this area. The Local Plan policy wording should ensure that this can be delivered in due course.

We encourage you to be ambitious, particularly in relation to those allocations which adjoin the Lye Valley SSSI such as Policy SPE 6- Churchill Hospital. We suggest that for these site allocations you consider requiring a higher minimum target score for the Urban Greening Factor than that set out in policy G3. This is due to the increased importance in this area for natural surface cover which in turn ensures that the hydrological processes on which the Lye Valley SSSI depends are maintained.

SPE 8- Warneford Hospital contains pockets of G1B green infrastructure as identified in the protected network and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network

Policy SPE 17- Jesus and Lincoln College Sports Ground

We welcome wording within the policy to ensure that development causes no adverse impact to the Lye Valley SSSI. This allocation in its entirety is part of the protected G1B green infrastructure network therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.

Sites of Least Environmental Value

In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Local plan evidence on the natural environment

A Sustainability Appraisal and Habitats Regulations Assessment appropriate assessment will need to be undertaken before the final version of the Local Plan is submitted. We may need to reconsider our response in light of any of the findings of these assessments.

For more information on sources of local plan evidence on the natural environment, please see the associated document, attached in the covering email for this Local Plan response. Natural England would welcome discussion with Oxford City Council on the emerging Local Plan SA and HRA.

We look forward to receiving the appropriate assessment as requested above and providing further advice in due course.

If you have any queries relating to the advice in this letter please contact me on

[REDACTED]

Yours sincerely

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Thames Solent Team