

Statement of Common Ground between Oxford City Council and Natural England

Submission Draft (Regulation 19) Oxford Local Plan 2040

March 2024

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Natural England for the Oxford Local Plan 2040. This SoCG reflects and confirms the current position on matters agreed by both parties with regard to the Duty to Cooperate.

1.2 Oxford City Council is producing a new Local Plan covering the period to 2040. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Local Plan. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and Duty to Cooperate

2.1 Natural England are the governmental body advising on issues relating to the natural environment in England, including its protection and restoration. They are key stakeholders and statutory consultees for the Council to work with as part of its Duty to Cooperate on the new Local Plan 2040.

2.2 Oxford City Council and Natural England have been engaging closely together throughout the formulation of the Local Plan 2040. Natural England have provided feedback at each of the key stages of Local Plan consultation process, including the Issues and Options consultation (2021), Preferred Options consultation (2022), Proposed-Submission Draft Local Plan Regulation 19 consultation (2023). The relevant consultation summary reports detail summaries of this feedback. Officers have also engaged with each other at key points outside of the formal consultation cycle via virtual meetings in order to discuss the shaping of policies, the drafting of supporting evidence, and to collaborate and seek to resolve areas of disagreement wherever possible.

2.3 The Proposed-Submission Draft Local Plan Regulation 19 consultation saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in early 2024. As per the relevant legislation/regulations, this version of the Local Plan was one that the City Council considered to be 'sound' for adoption, meeting the specific requirements for soundness as are outlined in the National Planning Policy Framework. Following the consultation, Natural England have provided a range of feedback on the strategic policies and site allocations varying from helpful comments and suggestions to a particular soundness concern in relation to the Habitat Regulations Assessment Appropriate Assessment evidence.

2.4 Following the end of the consultation on the 5th January 2024, Oxford City Council and Natural England have been engaging together on the comments and issues which they have identified with the Local Plan and supporting evidence. This further engagement between the two parties has included two direct meetings to discuss the identified issues (taking place 13th February 2024 and 18th March 2024) as

well as engagement via email. The aim of this collaboration has been to identify means of resolving identified issues, either through modifications to the Local Plan itself or to the HRA work in order to address Natural England's concerns, and ultimately result in a Local Plan submission that could be supported by Natural England without objection.

3.0 Strategic matters

3.1 A range of comments and suggestions were put forward by Natural England in relation to the policies of the Local Plan. The parties agreed that these were not soundness issues but rather, helpful feedback from Natural England's officers and suggestions for ways that policies could generally be improved or made clearer. The table in Appendix A sets out the specific feedback received against each policy and any proposed amendments the parties have agreed would strengthen these.

3.2 There were a few sites flagged for which Natural England suggested the impacts upon biodiversity were currently unclear and asked for additional clarification to confirm that the Council had considered how development could impact these and nearby SSSIs, these included allocations SPS15 (Redbridge Paddock), SPE1 (Government Buildings) and SPN1 (Northern Gateway). The allocations within proximity to watercourses and also those directly adjacent to SSSIs were also topics of discussion regarding whether there were additional details that could be included in the allocations in relation to managing impacts on biodiversity. The Council has revisited these allocations and where relevant identified minor modifications that could strengthen these policies and the appendix details where amendments have been proposed.

3.3 There were also a number of suggestions which, upon further discussion, the two parties have agreed are not necessary and these are identified in Appendix A also. In some places, the parties agree that these will be topics to be explored further in the subsequent Technical Advice Notes that will provide additional guidance to applicants in interpreting existing policies. For example, in relation to additional guidance on interpreting requirements for re-provision of green infrastructure as required under policy G2, or in relation to opportunity sites for providing off-site biodiversity net gain, particularly as the emerging Local Nature Recovery Strategy comes forward for the county.

3.4 The key soundness issue flagged by Natural England was in relation to the Habitat Regulations Assessment stage 2 Appropriate Assessment. The initial objection related to the fact that although a Stage 1 Screening Report had been produced for the Regulation 19 consultation, Natural England requested a Stage 2 Appropriate Assessment Report be supplied to them. The detail of the objection also highlighted the conservation objectives which Natural England expect the Stage 2 HRA to address. The City Council subsequently shared the Stage 2 – Appropriate Assessment with Natural England and this formed the main focus of the first discussion on 13th February 2024.

3.5 The discussion on the 13th February allowed the two parties to discuss the work to date and to hear feedback from Natural England on the Appropriate Assessment. A number of issues/queries were raised, including the potential of additional recreational impacts on the Oxford Meadows SAC if allocations for student accommodation instead came forward as residential, as well as the robustness of the air quality/transport modelling findings. The Council has iteratively responded to these issues in the intervening period via email and the two parties agree these have been resolved. A follow-up meeting

was then held on the 18th March 2024 at which officers from both parties discussed the remaining issues. This conversation focussed on Natural England's concerns involving how to address the potential 'in-combination' assessment of air quality impacts resulting from the growth arising from the emerging plans of the other Oxfordshire district councils.

4. Unresolved matters

4.1 Natural England currently have concerns that the current Air Quality and Habitats Regulations Assessments provided with the Local Plan do not provide enough certainty of no likely significant effects on integrity of Oxford Meadows SAC. Natural England are of the view that further discussions and assessment are required to provide certainty of the potential Air Quality impacts of the plan.

4.2 Natural England recognise that the Oxford City Local Plan as currently modelled shows a small impact alone. When considered in combination with other Local Plans and planning applications in Oxfordshire out to consultation, Natural England consider that the cumulative impact from these live plans and applications highlights a more significant issue. Natural England are willing to continue to work with Oxford City to support the resolution of the air quality impacts through the HRA process for this Local Plan ahead of the examination hearing.

4.3 Whilst the City Council acknowledges Natural England's remaining concerns, the Council's position is that lack of a strategic approach to air quality assessment is outside the scope of Oxford City Council's Local Plan and HRA process at this current time. The Council conducted an 'in-combination' air quality assessment as part of the HRA for the Local Plan 2036, the results of which were agreed with Natural England through a statement of common ground as part of the previous Local Plan examination. The assessment looked at the 'in-combination' impacts from air quality on the Oxford Meadows SAC from all the other submitted (and recently adopted) plans from the neighbouring Oxfordshire authorities.

4.4 The City Council considers that there is already a mechanism for the assessment of 'in-combination' impacts within the HRA process and that a strategic approach is not required. The City Council also considers that HRA 'in-combination' assessments should be undertaken at an appropriate time by the appropriate authority and that it is unfeasible and unrealistic for the Local Plan 2040 HRA to consider impacts of emerging Local Plans that have not yet been submitted to the Secretary of State for examination.

4.5 Therefore, the two parties are not in agreement about the approach to the 'in-combination' assessment of air quality impacts at this time. As set out above, the parties will continue to work together and seek to resolve this issue ahead of the examination hearings.

5.0 Concluding remarks/areas of agreement

5.1 Oxford City Council and Natural England have worked closely together throughout the Local Plan preparation process and the subsequent discussions between January and March 2024. The discussions have been productive and the City Council is appreciative of the comprehensive and constructive feedback that officers at Natural England have provided.

5.2 The two parties agree that the changes and responses set out in the Appendix address Natural England's initial concerns and/or resolve any queries raised in relation to the strategic policies and site

allocations of the Local Plan. Natural England has one outstanding area of concern in relation to the HRA. All other previously noted concerns with regards to the HRA have been satisfactorily resolved.

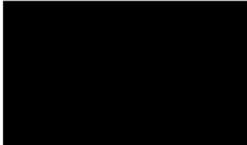
5.3 The one area where the parties do not agree is on the approach to how 'in-combination' impacts on air quality should be assessed. As set out in section 4 of this statement, Natural England consider that a strategic approach to air quality assessment should be undertaken by all the Oxfordshire Local Planning Authorities which looks at the growth proposed across the county. While the City Council considers that, given the timings of the plans of the other Oxfordshire authorities, it is not possible to undertake such an assessment at the current time.

5.4 The parties also agree to continue to work together to deliver a sound plan within the timescales available and to resolve this issue as the examination moves forward.

5.5 Whilst this additional work and engagement between the two parties has allowed us to find common ground on the majority of issues, both parties will continue to work together on issues that arise during the examination process including in preparing supporting guidance (such as Technical Advice Notes) in order to help implement the new Local Plan in due course, as well as engaging together on Natural England's wider concerns in relation to in-combination air quality impacts arising from broader growth across the county where necessary.

Signed on behalf of Natural England

Louise Crothall



Title: Manager

Date: 26/03/2024

Signed on behalf of Oxford City Council



David Butler, Head of Planning and Regulatory Services

Date: 26 March 2024

Appendix A - Natural England Reg 19 Feedback and Oxford City Council responses

Ref	Comment/Soundness	Detail of NE rep	NE's suggested amendment	Oxford City Council response	Minor, Major, no action
HRA & Oxford Meadows SAC	Unsound	<p>Natural England has concerns at this stage that insufficient detail and evidence has been provided in support of the Local Plan, particularly in relation to the lack of Appropriate Assessment.</p> <p>We agree with the screening conclusions presented in the HRA for the draft Oxford City 2040 Local Plan, September 2023 and look forward to receiving a copy of the stage 3 Appropriate Assessment for comment in due course.</p> <p>The Appropriate Assessment should consider the potential for impacts on Creeping Marshwort <i>Apium Repens</i> which is sensitive to hydrological, recreational and air quality impacts.</p> <p>Hydrological Impacts: The SAC relies on a balanced hydrological regime which comprises of interaction between groundwater and surface flows in terms of quantity and quality, both of which are potentially altered by the proposed development at policy SPN1- Northern Gateway in particular.</p> <p>Recreational Impacts: The SAC is an attractive, accessible and open area of semi-natural habitat for recreation, especially walking and dog walking. Increasing residential development close to the SAC will potentially cause further pressure from people using the site for recreation. Creeping Marshwort has been identified as sensitive to impacts from dog fouling and the Appropriate Assessment will need to assess the impact of a potential increase in visitor numbers to the SAC as a result of allocations particularly at SPN1- Northern Gateway. An appropriate level of mitigation in the form of alternative greenspace may also need to be determined.</p> <p>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.</p>	No amend proposed	<p>The Council has now shared the Appropriate Assessment with NE along with the air quality addendum. Following the meeting to discuss this work 13th Feb, the Council provided additional information to help respond to Natural England's queries in relation to recreational impacts from allocations that could provide student accommodation and further explain the background of the air quality modelling.</p> <p>As is documented in the body of the statement of common ground, common ground has not been reached on the assessment of in-combination, although the two parties will continue to engage together on this issue.</p>	No action

Policy G1	Comment	<p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<p>Whilst existing green features like ancient woodland, veteran trees and important hedgerows are identified separately from the green/blue spaces, policy G1 talks about them within the context of the green infrastructure network, as such we would consider them protected. They are not mapped in the same way as the core and supporting spaces on the policy map for practicality purposes.</p> <p>Irreplaceable habitat rightly receives very strong protection already in para 186 of the NPPF (Dec 2023) - we are unclear about any obvious reason for repeating this in Local Plan. We do address ancient woodland, ancient/veteran trees and important hedgerows in the policy because we felt it important to distinguish clearly in the context of applications affecting trees that a different approach needs to be taken for these features than other trees.</p> <p>Regarding priority habitat, whilst the Local Plan does not go as far as blanket protecting it all, generally the areas of significant priority habitat within Oxford are already designated (e.g. via SAC, SSSI, LWS, OCWS), these are protected through policy G6. Beyond this, a lot is also protected via core or supporting designation within policy G1.</p> <p>Furthermore, we have sought in this Local Plan to increase the protections of locally designated sites such that any impacts on priority habitat are more likely to be mitigated or compensated for onsite (via G6), this is effectively increasing protection of what we consider to be some of our more valuable areas of priority habitat. We consider that a blanket approach to priority habitat would be inappropriate given the wide range in the value of such qualifying habitat i.e. lowland fen versus standard hedgerow. It also bears consideration that biodiversity net gain and specifically the statutory biodiversity metric incentivises the retention and enhancement of priority habitats, the case for further protection of undesignated habitats in Oxford is unclear.</p> <p>Re-provision will depend on the quality of provision at the time of the application and what would be lost based upon the proposal. Whilst we have set minimum numbers for many allocations, the layout and finer</p>	<p>No further action proposed – additional guidance to be considered through the preparation of Technical Advice Note</p>
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Policy G2	Comment	The plan recognises the opportunity to enhance blue corridors and we welcome the inclusion of a commitment to restore bankside and instream 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.	The policies of the Local Plan need to be read as whole, so the requirements of G2 would be relevant regardless of whether they are also flagged in the allocation. Of course, we have tried to provide more detailed guidance of urban design requirements on all our allocations including more guidance in relation to opportunities to provide for nature/greening. As such, we have identified these opportunities on the allocation policies wherever these are relevant. Through consultation feedback, we have identified several sites where we have erroneously omitted that cross reference and will rectify this via minor mods.	Minor
Policy G4	Comment	Natural England welcome the inclusion of a commitment to deliver the mandatory 10% net gain in Biodiversity within local plan policy.	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	As we have set out in the background paper, we have chosen to maintain a 10% net gain target to align with the national legislation due to a lack of identified opportunities within the city where more than 10% net gain is likely to be deliverable. The policy does encourage higher delivery where possible. Our understanding from your response to our Preferred Options consultation was that this approach was supported.	No action – Technical Advice Note may incorporate additional guidance on offsetting locations as the LNRS work develops

			<p>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.</p> <p>The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where reprovision 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 reprovision.</p>	<p>Whilst the BNG legislation is an important tool in delivering for biodiversity, our current view is that going further than 10% net gain is unlikely to deliver more for biodiversity on proposals within the city due to the constrained nature of many sites. Indeed, delivery of 5% net gain as with current policy is often challenging for sites in the city resulting in reliance on offsetting. A higher target than 10% is instead likely to result in additional payments for biodiversity units to be delivered through offsetting into biodiversity net gain elsewhere outside of Oxford.</p> <p>We have sought to formulate policies in the Local Plan 2040 which can deliver meaningful improvements for the natural environment of the city through the development process. We feel that the multi-pronged approach we have taken, which includes specific requirements for biodiversity features onsite (many not recognised by BNG) as well as more surface greening via the urban greening factor, alongside a strong hierarchy of protection for existing green features is a more effective way of delivering for biodiversity improvement in Oxford that works within the constrained nature of many sites in the city.</p> <p>Of course, as BNG requirements become more common place and the biodiversity offsetting market matures in coming years, we will not rule out considering higher targets for BNG in subsequent Local Plans, where appropriate and where this mechanism can be shown to deliver meaningful improvements for biodiversity across the city.</p> <p>In relation to your second point, the Local Plan specifies that where BNG cannot be delivered onsite, BNG should first be explored on sites within the city and identified in the Local Nature Recovery Network, then elsewhere in the city, before looking to the wider county (LNRN sites first again). At present, the NRR mapping forms the most appropriate, evidence-based mapping of opportunity sites for BNG. We are also aware that this mapping may be updated as part of the forthcoming Local Nature Recovery Strategy which policy refers to. Purposefully directing applicants to these resources to identify opportunities allows flexibility where these are updated in future and future</p>	
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				<p>proofs the approach. We are cautious about being too specific about opportunity sites beyond this scale at this stage, as this risks second-guessing the LNRS work and could result in unintended conflicts with the results of that work.</p> <p>On basis of the above, we would again propose that as the LNRS work develops, it would be sensible to incorporate any additional guidance and signpost to this via the upcoming Technical Advice Note.</p>	
Policy G6	Comment	<p>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.</p> <p>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.</p> <p>Links/info provided in relation to Priority habitats and species as well as protected species.</p> <p>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 Page 3 of 4 • Agree priorities for nature's recovery It is the government's intention that mandatory biodiversity net gain will</p>	<p>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.</p> <p>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.</p> <p>Natural England encourage you to consider the Oxfordshire Nature Recovery Network and emerging Oxfordshire</p>	<p>The LP2040 does not have site allocations on land immediately adjacent to the SAC, where there are allocations assessed that could have an impact further away, we have included wording to set out expectations. In relation to the SSSIs, there are a couple directly adjacent:</p> <p>SPS15 – The supporting text flags the proximity to the SSSI and states in the policy about the need for no adverse impacts including incorporating SuDS and groundwater study. Policy also sets out requirements for considering the SSSI and incorporating buffer to the watercourse which lies between the site and the SSSI.</p> <p>SPE6 – policy flags proximity to Lye Valley SSSI and states permission only granted where no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. Goes on to talk about requirements for buffers during construction, to assess impacts on the flora and fauna, and need for adequate buffers and ecological enhancements as well as need for additional protective/enhancement measures for watercourse and ecological buffers zones.</p> <p>We have further reviewed the above and consider these to be sufficient to address your concerns, however, we will also make additional minor modification to the supporting text of SPE6 to ensure proximity to the SSSI is clear in a similar way to other allocations:</p> <p><i>8.214 The site directly adjoins a number of designated ecological sites including the Lye Valley SSSI and parts of the green infrastructure network.</i></p> <p>SPE7 – is directly opposite the Rock Edge SSSI and flags this in supporting text. Our impact risk zone assessment highlights that the key risk to this SSSI is direct land take which is not relevant to the allocation.</p>	Minor

		<p>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.</p> <p>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.</p>	<p>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 joinedup, wildlife rich places which will benefit people and wildlife.</p>	<p>It's proximity to the Lye Valley SSSI is flagged and policy states permission only to be granted where no adverse impact upon surface and groundwater flow to the SSSI. SPCW3 – the site's proximity to the New Marston meadows's SSSI is flagged and policy states permission only to be granted where no adverse impact upon surface and groundwater flow to the SSSI. The site is in close proximity to Magdalen grove SSSI, and again our impact risk zone assessment highlights that the key risk to this SSSI is direct land take which is not relevant to the allocation.</p> <p>SPS8, SPS13, SPE1, SPE2 – are also in proximity or within catchment of a SSSI (Iffley Meadows for SPS8 and SPS13; New Marston for SPE1 and SPE2) though not as close as the above. The policy flags this in supporting text and already sets out requirements in relation to mitigation expectations.</p> <p>No further action proposed in relation to these ones.</p> <p>See the response to NE's comments against G1 which addresses the point about irreplaceable/priority habitat.</p> <p>In relation to the point about the NRN, we have utilised the emerging mapping of the Oxfordshire Nature Recovery Network in a couple of ways. For example, in helping to refine the designation of core sites for the Local Plan GI network. Where the Oxfordshire NRN identifies a green space as core and it was determined to be contributing a clear green corridor function within the city, this has contributed to those spaces being made core in the city GI network. We have also incorporated the Oxfordshire NRN into preferred hierarchy of offsetting where applications cannot meet BNG requirements onsite, as well as including a reference to the future Local Nature Recovery Strategy, to allow this to be incorporated into this hierarchy once it is complete.</p>	
Site allocations					
Policy SPN1 Northern Gateway	Comment		<p>Due to the close proximity of this allocation to Oxford Meadows SAC, we will require a full Appropriate Assessment to be provided in</p>	<p>The Council has subsequently shared Appropriate Assessment with Natural England and the main statement of common ground documents ensuing discussions.</p>	Minor

			<p>support of the Local Plan as part of the Habitats Regulation Assessment.</p> <p>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.</p> <p>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.</p>	<p>In relation to the other suggestions, it should be noted that the majority of the site already has outline permission and some reserved matters. The Council has however reviewed the detail of the allocation and whilst there is already a buffer present in relation to the cycle way that runs along the south-western boundary propose the following modification in para 8.32 of the supporting text to direct applicants to consider and enhance this as part of the design of greening:</p> <p><i>New development on the site will need to consider how existing green features, particularly higher scoring elements, can be retained. This should include <u>respecting and responding to existing green features along boundaries of the site including those that help to provide a buffer to adjacent green spaces.</u> Sufficient replacements will</i></p> <p>On the suggestion about mapping the green infrastructure within the GI network – as the development is still forthcoming to be delivered this is why it has not been designated in the GI network. Where it has been completed in future, we would suggest that it will be for the next Local Plan update to capture this formally in the GI network. Of course, policies like G1 and G3 afford protection for green infrastructure that is not formally designated in the GI core/supporting network too.</p>	
Policy SPE1 Government Buildings and Harcourt House	Comment	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	Further information should be provided to evidence whether this site is deliverable.	In relation to the potential for fragmentation impacting the SSSI, the policy does set out the importance of establishing green linkages through the site through incorporating existing features as well as new planting and small green spaces. In particular it sets out that <i>the existing green infrastructure and proximity of the site to Headington Hill Park creates an opportunity for wildlife</i>	No further action

		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.		<p><i>corridors around the edge of, and through the site, which should be enhanced through the site as part of the green infrastructure provision.</i> It is considered that this would help to preserve the connectivity through the landscape and mitigate any potential fragmentation impacts on the SSSI.</p> <p>The Council has further reviewed the detail of the allocation in response to NE's concern. The supporting text flags the presence of priority habitat on parts the site to ensure applicants are aware and the policy requires biodiversity survey as well as setting out the strong protections for GI as highlighted above. As such, we propose no further amend.</p>	
Policy SPE3 Headington Hill Hall and Clive Booth Student Village	Comment	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.	<p>Policy G1 sets out for G1B: Supporting Green and Blue spaces that:</p> <p><i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher.</i></p> <p>This would apply to any development coming forward on this allocation.</p> <p>In relation to the woodland – the policy also specifies that: <i>In particular, there are a number of significant mature trees and some important tree groups, many of which will need to be preserved, and there must be no long-term overall loss of tree canopy cover across the site.</i></p>	No further action
Policy SPCW3 Manor Place	Comment	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.	<p>Thanks for flagging this, additional wording to be added under the open space section of policy as follows:</p> <p><u><i>A 10m ecological buffer should be left alongside the watercourse in accordance with Policy G2.</i></u></p>	Minor
Policy SPS8 Bertie Place Recreation Ground	Comment	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	<p>Policy G1 sets out for G1B: Supporting Green and Blue spaces that:</p>	No further action

			and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore reprovion for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network	<p><i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient reprovion, ideally onsite, and to the same standard or higher.</i></p> <p>This would apply to any development coming forward on this allocation.</p>	
Policy SPS13 Land at Meadow Lane	Comment	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.	<p>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.</p> <p>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 reprovion for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.</p>	<p>Thanks for flagging this, additional wording to be added under the open space section of policy as follows:</p> <p><u><i>A 10m ecological buffer should be left alongside the watercourse in accordance with Policy G2.</i></u></p> <p>Policy G1 sets out for G1B: Supporting Green and Blue spaces that:</p> <p><i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient reprovion, ideally onsite, and to the same standard or higher.</i></p> <p>This would apply to any development coming forward on this allocation.</p>	Minor
Policy SPS15 Redbridge Paddock	Comment	Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the	This site is identified as a supporting G1B asset of the protected green	On the first point, policy G1 sets out for G1B: Supporting Green and Blue spaces that:	No further change

		<p>requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.</p>	<p>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.</p> <p>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.</p>	<p><i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher.</i></p> <p>This would apply to any development coming forward on this allocation.</p> <p>In relation to the point about potential fragmentation impacts, the Council has reviewed this further and consider that if a proposal were to meaningfully retain the woodland buffer and protect river corridor/riparian corridor as the policy sets out, then they would preserve the connectivity through the landscape and mitigate any potential fragmentation impacts on the SSSI.</p> <p>The Council has reviewed the wording of the allocation in response to NE's concern and consider that the above is addressed via the current wording in the third para of the policy which sets out the importance of considering the SSSI and the implementation of a buffer and as such propose no further change.</p>	
<p>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</p>	<p>Comment</p>	<p>Allocations within the Lye Valley SSSI impact risk zone.</p> <p>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.</p>	<p>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.</p> <p>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</p>	<p>The work on the Lye Valley Study continues, the second year of monitoring of the site finishes at end of winter, the report will then be finalised, though this will be after Local Plan submission.</p> <p>Without knowing the outputs of the study, it is challenging to provide more detail in the Local Plan, however the Council's intention was that the requirements of policy G6 (not permitting development that would have an adverse effect on a SSSI) would be the hook for any further guidance that comes forward, as well as the specific wording in allocation policies that requires development to mitigate any impacts on the SSSI which is already there.</p> <p>Related to the above, as work on the Lye Valley study is ongoing, it is inappropriate to second-guess the results of that analysis before complete. Requiring a higher UGF score might suggest that this is a sufficient way to mitigate impacts on the Lye Valley when the required mitigation may be more nuanced. For example, we are not yet clear on factors such as the threshold of</p>	<p>No further change</p>

			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.	development at which an adverse effect can happen, the area of influence within which development needs to be located to cause an adverse effect. Potentially a higher UGF score may be the answer to mitigating adverse effects, but until we are clear on this it would seem to be a response not based on the evidence.	
Policy SPE8 Warneford Hospital	Comment	In addition to comments above relating to Lye Valley Impact Risk Zone.	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 G1 sets out for G1B: Supporting Green and Blue spaces that: <i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher.</i> This would apply to any development coming forward on this allocation.	No further action
Policy SPE17 Jesus and Lincoln College Sports Ground	Comment	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.	Policy G1 sets out for G1B: Supporting Green and Blue spaces that: <i>Planning permission will only be granted for proposals which affect Supporting Green and Blue spaces where any harm/ loss is mitigated by ensuring sufficient re-provision, ideally onsite, and to the same standard or higher.</i> This would apply to any development coming forward on this allocation.	No further action
Other	Comment	Sites of Least Environmental Value		Noted.	No further action

		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.			
Other	Comment	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.		Noted.	No further action