

## Oxford Local Plan 2042

### Interim Sustainability Appraisal report - Part two (Options Appraisal)

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# 1. Introduction

1.1 Part 1 of the Regulation 18 Interim Sustainability Appraisal (SA) report addressed the scoping stages of the SA process, including: a review of relevant policies, plans and programmes and sustainability objectives; collection of baseline information informing the sustainability context; identification of key issues and problems; and development of the SA/SEA framework. Together these addressed the requirements of Stage A and tasks A1-A5 of the Sustainability Appraisal process.

1.2 This Part 2 report details the appraisal of emerging options and alternatives for the Local Plan and which has informed the preferred approaches set out in the Regulation 18 first draft Local Plan consultation document. The Part 2 report is broken down into several sections which are as follows:

- Section 2 presents an appraisal of the Local Plan 2042 themes/objectives which support the wider vision is presented, which helps to identify how these align with the SA objectives discussed in Part 1 and where there could be possible conflicts that need to be addressed.
- Section 3 details how options for the Local Plan approaches have been developed. This section includes an appraisal of reasonable options for growth that have been considered for the overall Local Plan growth strategy; and then moves on to appraising options for policies where the wider plan-making process has identified that options could result in likely significant effects. The section concludes by detailing the process that is being carried out for identifying site allocations.
- Section 4 of the report then presents a high-level appraisal of the overall Regulation 18 first draft Local Plan, based upon preferred approaches presented in the consultation and the analysis undertaken on different elements of the emerging plan as were covered in the earlier sections. It begins to discuss where mitigations are proposed to address potential likely significant effects, which will be fleshed out further in preparing the Regulation 19 consultation.
- Section 5 sets out some conclusions and next steps.

1.3 The SA/SEA framework which was set out in Section 5 of the Part 1 report is referred to throughout this report and is reproduced in Table 1.1. This report utilises the same scoring matrix for impacts as was presented in Part 1 of the report, which is set out again in Table 1.2.

Table 1.1: The SA/SEA framework used to assess the impacts of the new Local Plan policies.

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

Table 1.2: Colour coding used throughout this report as assigned to varying levels of impact resulting from appraisals

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

## 2. Developing and testing the Local Plan vision, themes and objectives (Sustainability Appraisal Task B1)

2.1 The Local Plan 2042 will become the key planning document through which the vision for Oxford as a city by 2042 can be secured and implemented. The development of the Local Plan 2042 offers a fresh opportunity to look at the current context of sustainability issues, challenges and opportunities, alongside local, regional and national priorities, in order to produce an appropriate strategy and planning policy framework for the city.

2.2 Following on from the scoping stages of the Sustainability Appraisal process, as were presented in Part 1, this section of the part 2 report discusses the development of the Local Plan 2042 vision, themes and objectives and includes an appraisal of them against the SA framework.

### 2.1. Developing the Local Plan vision

2.3 The Local Plan 2042 is being guided by the vision that was driving the development of the Local Plan 2040 and that has already been subject to public engagement and feedback throughout the Local Plan 2040's preparation. The vision has been reviewed in light of the scoping undertaken as part of the early work in developing the Local Plan 2042 as was set out in the SA report part 1 and the associated background papers accompanying the Reg 18 consultation. Whilst it includes some minor modifications to reflect the updated time period for the Local Plan and feedback during the Local Plan 2040 Reg 19, the Council proposes that this remains a strong and relevant guide for the new Local Plan's development. It is as follows:

*In 2042 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects and values our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.*

2.4 The vision for the Local Plan 2042 is underpinned by six themes which were crafted through the Local Plan 2040's early development. These six themes were adapted from the three pillars of sustainable development (Society, Environment and Economy) and the intersects between them.

2.5 In turn, each of the six themes for the Local Plan 2042 are supported by a grouping of more specific Local Plan objectives. These objectives add greater detail to how the Local Plan will seek to deliver upon the themes and overarching vision, and more specifically respond to the particular sustainability issues, as well as local, regional and national priorities identified in the SA report part 1 and the associated Reg 18 consultation background papers.

2.6 In practice, there is overlap between the themes and the objectives, and these could ultimately be grouped in a variety of ways. Indeed, the specific objectives can be integral to multiple themes, and conversely, the themes are influenced by multiple objectives.

2.7 As with the vision, the Council has reviewed the scope of the themes and objectives as part of its early work on the Local Plan 2042. This was important for determining whether these remained relevant or whether contextual changes since they had first been prepared suggested amendments were needed. Following that review, it is proposed that the six themes generally continue to be an effective and relevant framework through which to structure the new Local Plan, though various modifications have been made to the underlying objectives. The six themes and the updated objectives are presented in Table 2.1.

*Table 2.1: The six Local Plan 2042 themes and underlying objectives*

<b>Local Plan 2042 theme</b>	<b>Underlying Local Plan 2042 objectives</b>
<b>A healthy and inclusive city to live in.</b>	<ul style="list-style-type: none"> <li>• Maximise capacity for delivering homes across the city and set a housing requirement that seeks to meet the needs of different groups as far as possible.</li> <li>• Provide access to affordable, high-quality and suitable accommodation for all.</li> </ul>
<b>A green and biodiverse city that is resilient to climate change.</b>	<ul style="list-style-type: none"> <li>• Secure strong, well-connected ecological networks and net gains in biodiversity.</li> <li>• Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property.</li> <li>• Protect and enhance Oxford's green and blue network.</li> <li>• Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.</li> </ul>

Local Plan 2042 theme	Underlying Local Plan 2042 objectives
<b>A fair and prosperous city with a globally important role in learning, knowledge and innovation.</b>	<ul style="list-style-type: none"> <li>• Maximise the benefits of the city's strengths in knowledge, healthcare and education while supporting economic growth in key sectors including science and innovation.</li> <li>• Recognise the valuable contribution that supporting a range of businesses (including SMEs) can make to innovation and economic diversity. Help to create the conditions in which all businesses can prosper.</li> <li>• Create opportunities for everyone in the city to access employment. Support local people giving them access to training, education and apprenticeships to make the most out of new job opportunities created in the city.</li> <li>• Help Oxford to continue in its role as a national and international destination and support the visitor economy by encouraging longer stays and higher spend in Oxford.</li> </ul>
<b>A liveable city with strong communities and opportunities for all.</b>	<ul style="list-style-type: none"> <li>• Provide neighbourhoods facilities needed to support our daily lives within a short walk from our homes, to support a liveable city.</li> <li>• Develop thriving local centres that support a variety of uses and foster activity throughout the day and night.</li> <li>• Demonstrate we value diversity whilst fostering greater inclusivity within our communities.</li> <li>• Create opportunities for supporting the transition to more sustainable/active forms of transport, including by reducing the need to travel, supporting good bicycle parking facilities and avoiding on and off-street car parking where possible across the city.</li> </ul>
<b>A city that respects its heritage and fosters design of the highest quality.</b>	<ul style="list-style-type: none"> <li>• Permit well-designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to.</li> <li>• Protect and enhance our valued and important heritage.</li> <li>• Curate a built environment that supports and enables people to be physically and mentally healthy.</li> </ul>
<b>A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.</b>	<ul style="list-style-type: none"> <li>• Ensure Oxford is ready for a net zero carbon future.</li> <li>• Our resources, including land, soil, and raw materials, will be protected and used prudently, with consideration for replenishment and renewal.</li> <li>• Contribute towards continued improvement in the city's air quality and its further limit impacts upon public health.</li> <li>• The city's water resources are utilised efficiently with consideration for the future, whilst water quality is protected and enhanced for the benefit of the wider environment.</li> </ul>

## 2.2. Testing the Local Plan themes and objectives

2.8 The six themes, including the underlying objectives that comprise them, are central to achieving the overall vision. As such, these have been assessed against the twelve

Sustainability Appraisal objectives to identify where there is potential for positive/negative/neutral or uncertain impact and the results of that assessment are presented in Table 2.2.

*Table 2.2: Appraisal of Local Plan 2042 themes against SA Objectives*

	1. Carbo n emissi ons	2. Resilie nce to climat e change	3. Efficie nt use of land	4. Local housin g needs	5. Inequa lities and health	6. Servic es, faciliti es and infrastr ucture	7. Green infrastr ucture and leisure	8. Traffic and air polluti on	9. Water	10. Biodiv ersity	11. Urban design and histori c enviro nment	12. Emplo yment and econo my
<b>A healthy and inclusive city to live in.</b>	-	0	0	++	+	?	0	+/-	-	0	0	++
<b>A green and biodiverse city that is resilient to climate change.</b>	0	++	+	-	+	+	++	0	+	++	0	+/-
<b>A fair and prosperous city with a globally important role in learning, knowledge and innovation.</b>	-	0	0	-?	+	0	0	-	0	0	0	++
<b>A liveable city with strong communities and opportunities for all.</b>	+	0	+	0	++	++	0	+	0	0	0	+
<b>A city that respects its heritage and fosters design of the highest quality.</b>	+/-	+/-	0	-	++	0	++	0	0	++	++	+/-
<b>A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon.</b>	++	0	?	0	++	0	0	+	+	+	+/-	0

2.9 The assessment as set out in Table 2.2 identifies that, taken as a whole, the six themes address each of the 12 SA objectives with varying degrees of impact. There are a significant number of areas where the six themes represent positive or significant positive

impacts in relation to the SA objectives and suggests that they are generally compatible. There are, however, elements of each of the themes which represent negative impacts with the SA objectives, or else less certain impacts and potentially suggest conflicts which may need to be managed. The rationale for the negative or uncertain scores is discussed below, this is followed by a short commentary on what the impacts mean for developing the Local Plan going forward.

*Table 2.3: Rationale for negative or uncertain scoring of Local Plan 2042 themes/objectives against the 12 Sustainability Appraisal criteria as were presented in previous table.*

<b>A healthy and inclusive city to live in</b>	<ul style="list-style-type: none"> <li>• Negative impacts identified against SA criteria 1 and 9, because new housing required to help meet identified needs will represent additional carbon emissions and water demands, though this could be mitigated to some degree with appropriate design standards.</li> <li>• Some positive impacts for criterion 8 where new housing can reduce commuting for Oxford employees currently forced to live further afield, however, more residents could increase local congestion resulting in negatives.</li> <li>• Uncertain positive impact against criterion 12, as new housing may improve employers ability to retain staff, however, depends on implementation.</li> <li>• Uncertain impact against criterion 6, new housing may help residents locate closer to services, improving access, however, it may also increase pressure on existing services unless commensurate contributions are secured to mitigate these pressures, impact is less clear and depends on implementation again.</li> </ul>
<b>A green and biodiverse city that is resilient to climate change</b>	<ul style="list-style-type: none"> <li>• Some negative impact against criterion 4 because the additional constraints presented by protecting green networks is likely to reduce availability of sites for housing and could reduce capacity of sites in terms of amount of housing delivered.</li> <li>• Some positive and some negative impacts for criterion 12, in that incorporating green infrastructure and generally making space for nature can help to boost market values of various uses and may make city more attractive to employers, however, additional constraints presented by protecting green networks could reduce ability of employers to expand.</li> </ul>
<b>A fair and prosperous city with a globally important role in learning, knowledge and innovation</b>	<ul style="list-style-type: none"> <li>• Negative impact identified against SA criteria 1 and 8, because new employment in the city, without commensurate housing could lead to increased numbers of commuters into the city with associated carbon emissions (at least in short term until fossil fuel vehicles are phased out). Additional employment growth, particularly high energy demand uses, will likely have additional associated carbon emissions (e.g. if energy demand is not sourced renewably), though again this could be mitigated somewhat with appropriate design standards.</li> <li>• Uncertain negative impact against criterion 4, if additional employment generates more staff needing housing in the city, though depends on where staff are coming from (they may already be local).</li> </ul>



<b>A liveable city with strong communities and opportunities for all</b>	<ul style="list-style-type: none"> <li>Uncertain positive impact against criterion 5, if improvements in accessibility to services and other facilities across the city can be secured, then this may help to reduce various health and economic inequalities amongst Oxford's communities, although it is highly dependent on how various policies and DM decisions are ultimately implemented.</li> </ul>
<b>A city that respects its heritage and fosters design of the highest quality</b>	<ul style="list-style-type: none"> <li>Some positive and some negative impacts for criteria 1 and 2, in that high-quality design could help to secure reductions in carbon emissions and deliver climate adaptation. However, sensitivities around heritage assets may limit scope of the actions that can be taken in new development if it could impact these, or it may mean existing emissions/ climate vulnerabilities affecting heritage assets remain locked in.</li> <li>Protecting existing heritage assets may help to preserve Oxford's special qualities which draw tourists yearly and support economy, however, heritage constraints may reduce scope of employment uses to expand, thus positive and negative impacts under criterion 12 also.</li> <li>Uncertain positive impacts for criteria 5, 7 and 10, because high quality design could mean ensuring new development is designed to support health and wellbeing of occupants, and also respects existing green features/biodiversity or brings forward enhancements/net gains as part of design, but depends upon implementation.</li> <li>Likely to be some negative impact for criterion 4 where existing heritage constraints might reduce capability to maximise capacity of sites for new housing.</li> </ul>
<b>A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon</b>	<ul style="list-style-type: none"> <li>Some positive and some negative impacts for criterion 11, whereby net zero standards and need to mitigate impacts on wider environment from new development could drive more efficient design and higher quality development overall, however, some net zero design measures may not be compatible with existing traditional buildings or protected heritage assets, also the improved performance of buildings may reduce scope of design (functionality prioritised over beauty).</li> <li>Uncertain positive impacts for criterion 5 because net zero design could help to reduce risks of occupants being exposed to fuel poverty, high energy bills, thus improving economic resilience.</li> <li>Uncertain impact for criterion 3, whereby improved practices around use of soils might secure some positives on previously degraded soils, but often this will represent purely mitigation of impacts to stop further degradation, so unclear.</li> </ul>

2.10 Of course, the six themes will work together as a whole, and identified positive or negative impacts in Table 2.2 do not consider the potential counterbalance in impacts that can occur under other themes. Areas of negative impact, as discussed in more detail above, do help to highlight areas where particular care will need to be taken around whether mitigation is needed. Equally, positive impacts identified can be considered as opportunities that the Council should seek to preserve as the Local Plan develops.

2.11 The benefit of the testing is in helping to understand where there is potential for impacts that may need to be explored further as the additional detail of the Local plan strategy and its policies emerges, as is the focus of the following sections.

## 3. Exploring options for the emerging Local Plan 2042 (Sustainability Appraisal Tasks B2 and B3)

3.1 The following sections set out how the Council has explored options for the Local Plan 2042 and come to the preferred options as presented in the Regulation 18 consultation's first draft Local Plan.

3.2 Firstly, the development of an appropriate overarching growth strategy for the Local Plan 2042 is discussed. Following this, consideration is given to thematic policy areas, before moving on to discuss work to explore site allocation options. A concluding section then draws matters together, considering the emerging preferred approach as a whole.

### 3.1. Developing the growth strategy for Local Plan 2042

3.3 There is more than one way of trying to meet the needs of residents, workers and visitors to Oxford and achieving the various objectives that have been identified for the new Local Plan. Oxford is a constrained city and there is insufficient land to meet all of the city's development needs within its boundary, but from this starting point there are a range of alternative approaches to explore. At the heart of this is a need to explore ways of balancing housing and wider development needs with objectives which could constrain growth, including relating to protecting and enhancing Oxford's sensitive environment and many heritage assets.

#### 3.1.1. Identifying reasonable alternatives for Local Plan growth strategy

3.4 Responding to key sustainability issues affecting the city, the Council has considered a number of potential growth strategy options (collectively 'alternatives') for the Local Plan 2042. The emerging preferred approach to growth (or 'preferred option', PO) involves striking a balance between providing for housing and employment land / floorspace (henceforth floorspace) needs whilst also delivering on wider plan objectives.

3.5 The primary focus under this emerging PO is planning for new homes, responding to the significant pressure in the city for improving access to housing and addressing ongoing affordability issues. The government's standard method identifies the housing need for the city. However, the constrained nature of the city means that a capacity-based requirement would be planned for under the PO, i.e. the requirement would be below identified need.

3.6 This shortfall could be met by neighbouring local authorities, but there are risks and uncertainties with any such strategy, such that there is a need to explore higher growth options with a view to ensuring that the Council has left 'no stone unturned'.

3.7 With regards to employment floorspace, under the emerging PO needs would be provided for almost in full, responding to the city's strong performing economy, particularly through a focus on intensifying and modernising key employment sites; however, some specific needs may not be met because land is prioritised for accommodating housing need. There is clearly market demand (as distinct from established need) to deliver a considerable further boost to employment floorspace, at least in the short term; however, on the other hand, a lack of available housing for workers is a key barrier to the city's economic growth.

3.8 Overall, it is recognised that there is an argument to be made for boosting employment floorspace supply (over-and-above the emerging PO), such that this is also something to explore further through appraisal of (and consultation on) growth strategy alternatives.

3.9 In summary, in addition to appraising and consulting on the merits of the emerging PO, there is a need to explore alternatives involving a boost to housing and/or employment.

### **Defining the alternatives in detail**

3.10 Beginning with the emerging PO which, as discussed, involves striking a careful balance, there is a need to distinguish between choices made at two spatial scales:

- City-wide – striking a balance means: A) supporting redevelopment of all available brownfield sites; and B) taking forward select greenfield sites, whilst also protecting a strong hierarchy of green and blue spaces that perform important functions like making space for biodiversity, flood resilience and physical/mental health.
- Site level – striking a balance means maximising capacity / development yields whilst also accommodating other features intrinsic to sustainable, healthy and well-designed places – like appropriate greening, open space, measures supporting active travel – and designing with onsite or nearby heritage and environmental assets in mind.

3.11 With regards to boosting supply, this might be achieved broadly by: A) boosting capacities at brownfield sites; or B) boosting greenfield supply from additional sites (though it should be noted that there is a very limited supply of additional greenfield sites without intrinsic constraints like flood plain, or national designation) and/or supporting increased capacities at greenfield sites.

3.12 As such, there are three broad alternatives:

1. The emerging PO (striking a balance)
2. Boost brownfield supply (boost site capacities)
3. Boost greenfield supply (boost sites and/or site capacities)

3.13 With regards to (2) and (3), the aim would be to provide more fully for development needs and drive greater quantum/densities of development across available sites whilst reducing alignment with wider plan objectives. This could be achieved by:

- Minimising any locally set policy requirements that could restrict development capacity on sites, including expectations around environmental enhancements.
- Protecting only the open spaces that have intrinsic constraints on development, such as areas of flood plain, or nationally designated ecological or heritage sites, and limiting consideration of wider benefits that many of other spaces provide.

3.14 However, it is important to be clear that the above would only be within reason - significant negative environmental effects would need to continue to be avoided/mitigated. There will also be intrinsic constraints such as flood risk, nationally designated biodiversity and heritage, which make development in certain locations inappropriate.

3.15 Finally, there is the question of policy support for housing versus employment.

3.16 The emerging PO, as discussed, can be described as a strategy that is weighted towards supporting homes, which in practice means intervening to curb very high current market demand for employment floorspace, but there is also a need to consider the alternative of reduced policy support for housing / increased flexibility for employment.

3.17 What this means in practice is either:

- Prioritising housing – policy emphasis on bringing forward new housing sites and additional housing on existing sites; and resisting any net loss of housing and encouraging alternative uses to convert to (or incorporate an element of) housing where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then, seeking to meet employment land / floorspace needs through policies which focus primarily on protecting and intensifying only key existing employment sites.
- Prioritising employment – policy emphasis on driving the intensification and expansion of existing employment sites or delivering new employment sites; and resisting the net loss of employment floorspace and setting policies for the protection of a range of employment sites (sites of national, regional and local importance); also encouraging alternative uses (not residential) to convert to uses that can deliver more employment where suitable and not conflicting with wider LP objectives (e.g. amenity); and only then seeking to provide for housing need through policies which focus on bringing forward new housing sites and additional housing on existing sites.

3.18 This leads to six reasonable alternative growth strategy options as are illustrated in the matrix in Table 3.1.

*Table 3.1: Growth strategy alternatives considered for Local Plan 2042.*

	Balanced development	Boost brownfield supply	Boost greenfield supply
Prioritise housing	Option 1a (Preferred option)	Option 2a	Option 3a
Prioritise employment	Option 1b	Option 2b	Option 3b

### 3.1.2. Testing the growth strategy alternatives

3.19 In order to explore the potential impacts arising from the growth strategy alternatives, these have been appraised against the 12 Sustainability Appraisal criteria using the same scoring mechanism as is used elsewhere in this report (see Table 1.2).

3.20 The detailed appraisal is set out in Table 3.2, followed by a concluding discussion.

Table 3.2: Detailed appraisal results for Local Plan 2042 growth strategy alternatives including commentary explaining rationale

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
1. Carbon emissions	-	--	-	--	--	--	<ul style="list-style-type: none"> <li>Assume negative impact in terms of emissions under all scenarios because more development is likely to equate to more emissions.</li> <li>Option 2a will result in more housing than option 1a/1b, however, may reduce in-commuting as more employees able to live closer to work.</li> <li>Options 1b, 2b and 3b will result in more employment generated without commensurate housing and therefore more commuters into city, with associated additional transport emissions.</li> <li>Option 3a could reduce commuting levels, but also brings in additional housing development than other options so similar level of impact to 3b and 2b.</li> </ul>
2. Resilience to climate change	+	+	+/-	+/-	--	--	<ul style="list-style-type: none"> <li>Option 1a and 1b allow protection of a range of green spaces that help with reducing overheating and flood risk. They would also allow a balanced approach to the design of sites, fully utilising capacity for development, whilst also providing for range of greening and open space that helps resilience.</li> <li>Option 2a and 2b would seek to fully maximise already developed sites, potentially able to protect a similar network of green spaces as under options 1a/1b. However, the minimal local standards that would facilitate maximising sheer quantity of development could reduce ability to deliver resilience measures like greening onsite.</li> <li>Options 3a and 3b would potentially see development across a range of green spaces, impacting local resilience. Whilst the most high-risk spaces for flooding (e.g. floodplain) would not be developed, thus retaining some resilience, other spaces that still provide important resilience (e.g. slowing water run off and storing water, as well as urban cooling), could be lost.</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
3. Efficient use of land	+	+	+/-	+/-	--	--	<ul style="list-style-type: none"> <li>Options 1a and 1b perform best as development would be required to maximise capacity of sites whilst also delivering upon wider LP objectives, coupled with protection of a network of greenfield sites and steering development to brownfield spaces first (though not ruling out lower quality green sites).</li> <li>Option 3a and 3b are considered least efficient because of potential for loss of a range of green spaces including more valuable green spaces in the city. It is likely that more development of green sites will harm more areas of soil which have not already been impacted by development (another consideration under this objective). More potential greenfield sites for development could also reduce the pressure to maximise the efficient use of brownfield sites first. A push to maximise quantum of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which could impact efficiency in terms of meeting all objectives.</li> <li>Options 2a and 2b are likely to have some positives and negatives. Though some greenfield sites would still be allocated under these scenarios, these options would encourage the maximising of previously developed sites in the city which is considered to be a very efficient use of land. However, as with options 3a and 3b above, there is potential that in the drive for maximising the quantum/density of development on brownfield sites at the cost of securing other measures on these sites, such as additional greening, open space, would lead to less efficient developments in the round.</li> <li>A contrary view is that option 2a and 2b are most efficient for delivering highest densities of development on brownfield sites in the city whilst protecting greenfield land, so these could be scored higher if a view of efficiency was more solely focused just on this element of the issues covered under this criterion.</li> </ul>



SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
4. Local housing needs	+	+/-	+	-	++	-	<ul style="list-style-type: none"> <li>All options will provide some level of additional housing having a positive impact, though the housing focus of options 1a, 2a and 3a will have greater positive impact and are likely to support greater provision for meeting housing needs of various groups (e.g. need for affordable housing).</li> <li>Options 2a and 3a would each go further towards meeting a greater proportion of housing needs than 1a because they would seek to drive greater quantum/capacity of development whilst reducing other provisions on site (though still unlikely to meet need in full). Option 2a is not considered significant positive, as even maxing out development capacity on sites is unlikely to have potential to contribute any significant additional housing capacity as the sites are already quite constrained, although it would likely be somewhat higher than option 1a.</li> <li>Option 1b, 2b and 3b would provide some housing, but the focus on delivering to meet employment need first is likely to then exacerbate existing housing need (generating more jobs and more people needing to places to live). This indicates a score that reflects some positives and negatives for option 1b.</li> <li>Option 2b and 3b would also provide some housing, though the focus of using the additional capacity unlocked on brownfield (as under 2b) or greenfield sites (as under 3b) would firstly be for employment. Overall, the potentially greater levels of employment generated in the city under these options would exacerbate housing need further and outweigh positives, leading to minor negative impacts.</li> </ul>
5. Inequalities	?	?	?	?	?	?	<ul style="list-style-type: none"> <li>The impact of the options on inequalities will depend heavily on implementation and is difficult to score at this level. It is likely that all options will make some contribution to elements of inequality, however,</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							such as access to affordable housing or access to jobs skills. Specific impacts will depend on how particular applications come forward.
6. Services and facilities	+/-	+	+/-	+	-	-	<ul style="list-style-type: none"> <li>More housing, particularly on brownfield sites, under options 1a and 2a will mean more people can live in accessible locations that allow them to reach various daily needs via active travel. However, additional residents could put strain on existing services if these are not enhanced or added to, or if existing facilities are allowed to be lost.</li> <li>Additional growth in employment uses under option 1b, 2b and 3b could include uses that provide for daily needs of the local population which may therefore improve access—this will be slightly more positive under the brownfield focused options than greenfield, which could see some of these uses located in less accessible locations too (so may depend on implementation somewhat). The reduced population growth under these scenarios would still include some additional pressure, however, but less so than under housing focused scenarios.</li> <li>Greenfield sites in the city are less likely to be located in accessible locations, though some areas will be more accessible than others. When this is combined with the more significant population growth associated with more housing accommodated across greenfield sites, this leads to a more negative impact under option 3a. The same accessibility concerns would impact the greenfield sites if employment instead came forward (as under option 3b) and could also mean employment generated away from existing employment clusters, although additional pressure on existing services from new housing may be reduced compared with scenario 3a.</li> <li>There is, however, an element of uncertainty to these scores as it should be acknowledged that any viable sites may be able to deliver additional public benefits, including new community infrastructure.</li> </ul>
7. Green infrastructure	+	+	+/-	+/-	--	--	<ul style="list-style-type: none"> <li>Options 1a and 1b have some positive benefits. The balanced approach to requiring development to maximise quantum/density whilst also</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
e, leisure and recreation							<p>delivering upon wider LP objectives will allow for development to incorporate a range of new green features (or protect existing features). This is coupled with protection of a network of greenfield sites (though not ruling out lower quality green sites) across the city which will contribute to a strong GI network.</p> <ul style="list-style-type: none"> <li>Options 2a and 2b are unlikely to be able to secure as significant benefits on brownfield sites because they would sacrifice additional local standards for environmental enhancements like greening and open space in order to maximise development quantum/density. However, they would still allow for protection of a network of green infrastructure across the city (though some lower quality greenfield sites would be allocated).</li> <li>Options 3a and 3b will be significantly negative because of potential for loss of a range of green spaces including more valuable green spaces in the city. A push to maximise quantum of development on greenfield sites could come at the cost of securing other measures on these sites, such as additional greening, open space, which leads to less efficient developments too.</li> </ul>
8. Traffic and associated air pollution	+/-	-	+/-	-	-	--	<ul style="list-style-type: none"> <li>Under all options, it is assumed that air quality impacts will continue to reduce as vehicles shift away from fossil fuel burning, and wider county measures such as LTNs, expansion of the Zero Emissions Zone and electric bus fleet introduction take effect. However, emissions impacts will continue to some degree, particularly in earlier years of the Plan.</li> <li>Option 1a, 2a and 3a would help to reduce the imbalance between those working in Oxford but being forced to live further afield and having to commute in for work, by providing more housing in the city (increasing levels for 2a and 3a).</li> <li>However, under the same options, the associated increases in population associated with greater levels of housing could bring additional vehicles into the city (meaning some negative impact). Though private vehicle</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							<p>ownership may be tempered by reduced levels of parking provision that would be necessitated by low parking requirements, but also because maximising density of development of sites will mean trade off with space for parking.</p> <ul style="list-style-type: none"> <li>• Additionally, under option 3a, some of the greenfield housing sites coming forward for development are likely to be in less easily accessible locations which may increase reliance on private vehicle ownership (pushing this option into predominantly a negative impact score). However, this negative might be reduced where there is a major focus on greenfield that can deliver sustainable transport improvements.</li> <li>• Options that focus on boosting employment/economic growth risk further exacerbating the imbalanced commuting patterns in the city, particularly where job creation is not matched with housing provision. The result is likely to mean more people travelling into city, some via private vehicles. This is likely to result in negative impacts under options 1b and 2b, and more significant negatives under 3b, due to it enabling greater expansion of employment floorspace as well as new sites in less accessible locations (including away from existing employment clusters).</li> </ul>
9. Water	+/-	+/-	-	-	--	-	<ul style="list-style-type: none"> <li>• For water, there is a need to consider both water resources/supply and water quality including impacts on wastewater infrastructure (although a scheme has been agreed with Thames Water to bring upgrades to the local wastewater treatment works to address existing capacity concerns and unlock future growth).</li> <li>• Options 1a and 1b would both generate housing, (more so under option 1a), and this will increase demand for water, as well as pressure on wastewater infrastructure. However, there will be greater opportunities to mitigate impacts from development on water quality because of the more balanced approach to design on sites. Some development capacity is</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							<p>afforded to environmental improvements like greening, open space, SUDs and buffers along watercourses.</p> <ul style="list-style-type: none"> <li>Maximising the development quantum on brownfield sites not only increases amount of housing that can be delivered (with additional demands on water resources and wastewater treatment), but also minimises the environmental features that can mitigate impacts on water quality, leading to negative impacts under options 2a and 2b (2a is likely slightly more negative than 2b in terms of impact on water resources/wastewater).</li> <li>Option 3a and 3b have similar impacts as options 2a and 2b, however, the more expansive loss of greenfield sites across the city will have greater impacts on the water environment. For example, more urbanisation and loss of natural surface cover could exacerbate surface water run-off, leading to flooding and additional pollutants running into watercourses, though this may be mitigated somewhat depending on how SUDs are applied. However, the impact under 3a is more significant due to the additional amounts of housing that would come forward, with associated demands on water resources/wastewater.</li> </ul>
10. Biodiversity	0	0	0	0	-	-	<ul style="list-style-type: none"> <li>Outside of the Local Plan's control, under all options, development will be expected to deliver the mandatory 10% Biodiversity Net Gain associated with the Environment Act, so there should generally be positive impacts in terms of habitat creation. However, the nature of many sites in Oxford is that BNG is likely to need to be delivered offsite.</li> <li>The loss of greenfield sites under scenarios 3a and 3b is likely to lead to some additional fragmentation of habitats and wildlife corridors. On the assumption that some BNG will need to be delivered offsite, the limited opportunities to deliver locally in the wider city could be reduced further if greenfield sites are taken forward for development, meaning that this could be pushed further outside of Oxford. Allowing more development of</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							<p>greenfield sites would have additional negative impacts if this extended to local designated sites, although it is assumed national designations (e.g. SAC and SSSIs) would still be protected as minimum.</p> <ul style="list-style-type: none"> <li>Options 1a, 1b, 2a, and 2b would likely lead to a neutral impact. They would retain a broader network of greenfield sites which would include national and local designated sites and would help to maintain wildlife corridors/linkages across the city. Options 1a and 1b would, however, also allow for incorporating space for greening and other non-habitat ecological enhancements (e.g. features not recognised by the DEFRA BNG metric's habitat focus). This means that spaces for biodiversity could be incorporated onsite, to the benefit of species including priority species, even if onsite BNG is not feasible. Uncertain whether this would push the options into a positive impact or maintain neutral impact, however.</li> </ul>
11. Good urban design / the historic environment	+	+	--	--	--	--	<ul style="list-style-type: none"> <li>Good urban design requires a balancing of various requirements on a development, not just the maximising of density. As such, options 1a and 1b would have positive impacts because of the balanced approach they would push for. These options would also allow for incorporating policies that guide design towards sufficiently mitigating harm (and ideally enhancing the setting of) various local and national designated (and non-designated) heritage assets.</li> <li>Options 2a/2b, and 3a/3b which focus on maximising density on brownfield or greenfield sites, could have significant negative impacts for design as they forgo other design considerations in order to maximise sheer quantum of development/density of development on these sites.</li> <li>In addition, for options 2a/2b/3a/3b, the minimised local standards necessary to reduce constraints on development quantum/density would likely reduce the ability to influence design with respect to local context, such as the wealth of historic assets in the city. Equally, many brownfield sites are clustered closest to the city's dense array of heritage</li> </ul>

SA Objective	Option 1a	Option 1b	Option 2a	Option 2b	Option 3a	Option 3b	Appraisal rationale
							assets, meanwhile, some of the only greenfield sites that could feasibly be explored under options 3a/3b (and that have not otherwise been ruled out for other reasons like floodplain or ecology), make an important contribution to Oxford's historic setting and townscape. Thus, additional development under these scenarios is considered to have potential for significant negative impacts on heritage in the city.
12. Economic growth	+	+	+	++	+	++	<ul style="list-style-type: none"> <li>• All options are considered to have some level of positive impact for the economy in Oxford, though options 2a and 3a would bring more significant positive impact.</li> <li>• Housing delivery is a key barrier to economic growth as businesses struggle to retain or attract staff due to inability to access affordable housing nearby, thus the housing focus scenarios would have some positive impact for economic growth in this way.</li> <li>• Option 1b, 2b and 3b are focused on employment/economic growth. These will ensure a wide network of protected sites are protected from loss of employment uses including locally, regionally and nationally important sites, even if these sites are not currently performing.</li> <li>• Options 2b and 3b will more easily facilitate increases in employment floorspace by allowing existing sites to expand/intensify fully and allow new sites to come forward, particularly under option 3b which would allow development on more greenfield sites.</li> <li>• Regardless of the option taken, there will likely continue to be competition from high value employment uses which could push out lower value employment and reduce access to affordable workspaces and lower skilled jobs.</li> </ul>

### 3.1.3. Findings from the testing of growth strategy alternatives

3.21 Table 3.3 presents a summary of the appraisal scoring for each of the six growth strategy alternatives as was detailed in the previous section (Table 3.2).

*Table 3.3: Summary of appraisal results for Local Plan 2042 growth strategy alternatives*

SA Objective	Option 1A	Option 1B	Option 2A	Option 2B	Option 3A	Option 3B
<b>1. Carbon emissions</b>	-	--	-	--	--	--
<b>2. Resilience to climate change</b>	+	+	+/-	+/-	--	--
<b>3. Efficient use of land</b>	+	+	+/-	+/-	--	--
<b>4. Local housing needs</b>	+	+/-	+	-	++	-
<b>5. Inequalities</b>	?	?	?	?	?	?
<b>6. Services and facilities</b>	+/-	+	+/-	+	-	-
<b>7. Green infrastructure, leisure and recreation</b>	+	+	+/-	+/-	--	--
<b>8. Traffic and associated air pollution</b>	+/-	-	+/-	-	-	--
<b>9. Water</b>	+/-	+/-	-	-	--	-
<b>10. Biodiversity</b>	0	0	0	0	-	-
<b>11. Good urban design / the historic environment</b>	+	+	--	--	--	--
<b>12. Economic growth</b>	+	+	+	++	+	++

3.22 Option 1a, the balanced approach to growth with a housing focus, is clearly shown to perform well, in that it is associated with comfortably the most positives and fewest negatives. It is recognised that there is also a case to be made for options 2b, 3a and 3b from either a housing (option 3a) or an economic growth perspective (options 2b and 3b), but these benefits come at a considerable cost in terms of wider sustainability objectives.

3.23 The view of Officers at the current time – subject to further work, discussion and consultation – is that option 1a represents sustainable development on balance. As part of this, it is important to be clear that option 1a would provide significantly for housing



delivery, thereby contributing strongly to meeting locally arising needs (but still likely generating unmet needs) and would make a positive contribution to economic growth, specifically by protecting key employment sites and enabling their intensification/modernization whilst also contributing new housing to reduce barriers for employees wanting to live closer to where they work. It would also allow a strong framework to be set out for protecting and enhancing the wider environment and securing various benefits for the health and wellbeing of the city's residents and visitors.

## 3.2. Developing Local Plan policy approaches

3.24 This sub-section of the Sustainability Appraisal discusses the development of the specific policy options for the Local Plan 2042. The preferred options document sets out a number of preferred policies which have been put forward in response to the known issues and challenges within the city and these are collected into chapters that follow the various Local Plan 2042 themes. Various options have been considered for these policies and the process of determining the preferred approach has been informed by the sustainability considerations throughout. Where alternative options for policies were identified which could result in likely significant effects, these options sets were screened into the Sustainability Appraisal process to inform decisions about preferred options.

### 3.2.1. Identifying options for policies and considering sustainability impacts

3.25 For each of the preferred policy approaches set out in the Regulation 18 document, the Council has identified a number of options for the approach which could be taken in the Local Plan 2042. These options are presented as tables of options sets and recorded within the relevant supporting background papers that accompany the consultation.

3.26 Once the options sets had been developed, the Council has then considered the implications of each policy option, including:

- potential positive consequences that taking it forward would secure for the city,
- negative or neutral consequences of each approach, such as where these would conflict with local priorities or that could cause other challenges.

3.27 As part of weighing up the different options that could be taken during this 'optioneering' process, the Council has sought to ensure that choices about each preferred approach have been considered with regard to its sustainability implications at a high-level, with reference to the 12 SA objectives as a framework to guide officers' thinking. This has helped to ensure that sustainability considerations have been intrinsic to the process of identifying a preferred approach. A summary of these high-level screenings

undertaken for each option set is presented in the relevant background papers alongside the tables of options sets themselves.

3.28 This high-level sustainability screening has helped to identify where particular options and alternatives for a policy approach have likely significant effects against any of the SA objectives. Where potential for significant sustainability impacts were identified, it was determined that these options sets should be ‘scoped in’ for Sustainability Appraisal with a full assessment of their potential impacts against the 12 SA objectives, which is documented later in this report.

3.29 Table 3.4 identifies which policies have been scoped in for sustainability appraisal (coloured blue and flagged in column three). The table also sets out which background paper records the high-level screening conclusions for each of the options sets considered for the Local Plan 2042 Regulation 18 consultation.

*Table 3.4: Results of high-level SA screening of policy options sets including options sets that have been ‘screened in’ for detailed appraisal*

<b>Local Plan 2042 policy option set title</b>	<b>Applicable background paper where options set is presented</b>	<b>Detailed appraisal needed?</b>
001a: Housing requirement for the plan period	001 Housing need, requirement and mix	Yes
001b: Mix of housing sizes (no. bedrooms)	001 Housing need, requirement and mix	No
001c: Loss of dwellings	001 Housing need, requirement and mix	No
002a: Affordable housing – Overall requirement	002 Affordable housing	No
002b: Affordable housing: financial contributions for new student accommodation...	002 Affordable housing	No
002c: Affordable housing: financial contributions from self-contained older-persons accommodation	002 Affordable housing	No
002d: Affordable housing: financial contributions from commercial development	002 Affordable housing	No
002e: Employer-linked affordable housing	002 Affordable housing	Yes
003a: House of Multiple Occupation (HMOs)	003 Specialist housing including student accommodation, self-build, older persons	Yes
003b: Location of new student accommodation	003 Specialist housing including student accommodation, self-build, older persons	Yes
003c: Ensuring there is enough student accommodation to meet needs	003 Specialist housing including student accommodation, self-build, older persons	No
003d: Homes for travelling communities	003 Specialist housing including student accommodation, self-build, older persons	No
003e: Homes for boat dwellers	003 Specialist housing including student accommodation, self-build, older persons	No
003f: Elderly persons’ accommodation and other specialist housing needs	003 Specialist housing including student accommodation, self-build, older persons	No

<b>Local Plan 2042 policy option set title</b>	<b>Applicable background paper where options set is presented</b>	<b>Detailed appraisal needed?</b>
003g: Self-build and custom house building options	003 Specialist housing including student accommodation, self-build, older persons	No
003h: Community-led housing	003 Specialist housing including student accommodation, self-build, older persons	No
003i: Boarding school accommodation	003 Specialist housing including student accommodation, self-build, older persons	No
004a-1: Employment strategy	004 Employment and inclusive economy	No
004a-2: Making Best Use of Existing Employment Sites	004 Employment and inclusive economy	No
004a-3: Allowing housing on existing employment sites	004 Employment and inclusive economy	No
004a-4: Location of new employment uses	004 Employment and inclusive economy	No
004b: Warehousing and storage uses	004 Employment and inclusive economy	No
004c: Community Employment and Procurement Plans	004 Employment and inclusive economy	No
004d: Affordable Workspaces	004 Employment and inclusive economy	No
004e-1: Short-stay accommodation (hotels and guest-houses) (New Accommodation)	004 Employment and inclusive economy	No
004e-2: Short-stay accommodation (hotels and guest-houses) (Existing Accommodation)	004 Employment and inclusive economy	No
005a: Protection of GI network and green features	005 Green Infrastructure and biodiversity	No
005b: Provision of new GI features	005 Green Infrastructure and biodiversity	No
005c: Provision of new GI features – Urban Greening Factor	005 Green Infrastructure and biodiversity	No
005d: Delivering mandatory net gains in biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005e: Protecting and enhancing onsite biodiversity in Oxford	005 Green Infrastructure and biodiversity	No
005f: Protecting Oxford's ecological network	005 Green Infrastructure and biodiversity	No
007a: Flood risk and Flood Risk Assessments (FRAs)	007 Flood risk, drainage and SuDS	No
007b: Sustainable Drainage Systems (SuDS)	007 Flood risk, drainage and SuDS	No
008a: Net zero buildings in operation	008 Carbon reduction and climate resilient design	No
008b: Embodied carbon	008 Carbon reduction and climate resilient design	No
008c: Retrofitting existing buildings including heritage assets	008 Carbon reduction and climate resilient design	Yes
008d: Resilient design and construction	008 Carbon reduction and climate resilient design	No
009a: Air Quality Assessments and standards	009 Natural resources	No
009b: Water resources and quality	009 Natural resources	No
009c: Soil quality	009 Natural resources	No
009d: Contaminated land	009 Natural resources	No

<b>Local Plan 2042 policy option set title</b>	<b>Applicable background paper where options set is presented</b>	<b>Detailed appraisal needed?</b>
009e: Amenity and environmental health impacts of development options	009 Natural resources	No
010a: Healthy Design/Health Impact Assessments (HIAs)	010 Health and wellbeing	No
010b: Privacy, daylight and sunlight	010 Health and wellbeing	No
010c: Internal space standards for residential developments	010 Health and wellbeing	No
010d: Outdoor amenity space	010 Health and wellbeing	No
010e: Accessible and adaptable homes	010 Health and wellbeing	No
011a: Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011b: Non-Designated Heritage Assets	011 Urban design, placemaking, heritage and archaeology	No
011c: Archaeology	011 Urban design, placemaking, heritage and archaeology	No
011d: Principles of high-quality design of buildings	011 Urban design, placemaking, heritage and archaeology	No
011e: Efficient use of land	011 Urban design, placemaking, heritage and archaeology	No
011f: View Cones and High Buildings	011 Urban design, placemaking, heritage and archaeology	No
011g: Bin and Bike Stores and external servicing features	011 Urban design, placemaking, heritage and archaeology	No
012a: Transport assessments, travel plans and servicing and delivery plans	012 Transport	No
012b: Bicycle parking design standards	012 Transport	No
012c: Motorcycle and Powered Two Wheelers Parking Design Standards	012 Transport	No
<b>012d: Motor vehicle parking design standards</b>	<b>012 Transport</b>	<b>Yes</b>
012e: Electric Vehicle Charging	012 Transport	No
013a: Focusing town centre uses in existing centres	013 Livable city - including retail	No
013b: Maintaining vibrant centres	013 Livable city - including retail	No
013c: Protection and alteration of existing local community facilities	013 Livable city - including retail	No
013d: Provision of new local community facilities	013 Livable city - including retail	No
013e: Protection and alteration of learning and non-residential institutions	013 Livable city - including retail	No
013f: Provision of new learning and non-residential institutions	013 Livable city - including retail	No
013g: Protecting cultural, social and visitor attractions	013 Livable city - including retail	No
013h: Provision of new cultural, social and visitor attractions	013 Livable city - including retail	No
014a: Infrastructure considerations in new development	014 Infrastructure	No

Local Plan 2042 policy option set title	Applicable background paper where options set is presented	Detailed appraisal needed?
014b: Digital Infrastructure	014 Infrastructure	No

### 3.2.2. Targeted Sustainability Appraisal for scoped in policy options sets

3.30 As set out in Table 3.4 in the previous section, a limited number of policy options sets for Local Plan 2042 have been taken forward for further testing in this Sustainability Appraisal because it has been determined that the options (or some of the options considered) were likely to result in significant effects against one or more of the SA objectives. Scoping them in for a full sustainability appraisal has allowed the Council to more fully explore each option's potential for impacts against the 12 SA objectives which has then been factored into the decision about the preferred approach. The list of the 'scoped in' options sets is as follows:

- Policy Options set 001a: Housing requirement for the plan period
- Policy Options set 002e: Employer-linked affordable housing
- Policy Options set 003a: Houses in Multiple Occupation (HMOs)
- Policy Options set 003b: Location of new student accommodation
- Policy Options set 008c: Retrofitting existing buildings including heritage assets
- Policy Options set 012d: Motor vehicle parking design standard

3.31 The following tables set out the results of the detailed Sustainability Appraisal testing undertaken for these scoped in policy options sets, more detailed versions of the tables with additional commentary that explains rationale for scoring are included in Appendix A. Options considered for each policy set are set out in columns and scored against each of the twelve SA objectives which form the SA framework using the same scoring methodology used elsewhere in this report. Some concluding remarks are set out at the end of each table highlighting the main findings in terms of sustainability impacts and sometimes identifying where there may need to be additional mitigation put forward to avoid negative impacts.

#### Policy Options set 001a: Housing requirement for the plan period

3.32 Policy options that were considered, as discussed in detail in Background Paper 001, are as follows:

- **Option a:** Set a housing requirement in the Plan based on the full housing need identified through the Standard Method (c.21,740 dwellings over the Plan period 2022-2042).
- **Option b:** Set a housing requirement lower than the need identified by the Standard Method, based on capacity calculated in accordance with the spatial strategy (c.8,800 dwellings over the Plan period 2022-2042).
- **Option c:** Set a housing requirement higher than the standard method in order to support economic growth or affordable housing need, even though achieving this requirement would rely on delivery outside of Oxford's boundaries.

3.33 There is some overlap in testing of this option set with the testing undertaken for the growth strategy alternatives as set out in Section 3.1, particularly where they related to having a focus on housing. Whilst that appraisal has helped inform this testing as there are considerations that overlap, this option set specifically considers different approaches to setting the housing requirement in the Local Plan and the impacts that could arise, thus the appraisal does differ.

*Table 3.5: Appraisal of options set 001a*

SA Objective	Option A	Option B	Option C
1. Carbon emissions	--	-	--
2. Resilience to climate change	--	0	--
3. Efficient use of land	?	?	?
4. Local housing needs	++	+	++
5. Inequalities	?	?	?
6. Services and facilities	?	?	?
7. Green infrastructure, leisure and recreation	-	0	-
8. Traffic and associated air pollution	-?	+/-	-?
9. Water	--	+/-	--
10. Biodiversity	-?	0	-?
11. Good urban design / the historic environment	--	0	--
12. Economic growth	+ / ++	+	++

### Policy Options set 002e: Employer-linked affordable housing

3.34 Policy options that were considered, as discussed in detail in Background Paper 002, are as follows:

- **Option a:** On specified sites listed in the Plan, allow developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority).
- **Option b:** Do not include an employer linked housing policy.

*Table 3.6: Appraisal of options set 002e*

SA Objective	Option A	Option B
<b>1. Carbon emissions</b>	N/A	N/A
<b>2. Resilience to climate change</b>	N/A	N/A
<b>3. Efficient use of land</b>	+	0
<b>4. Local housing needs</b>	++	0
<b>5. Inequalities</b>	+	0
<b>6. Services and facilities</b>	N/A	N/A
<b>7. Green infrastructure, leisure and recreation</b>	N/A	N/A
<b>8. Traffic and associated air pollution</b>	+	0
<b>9. Water</b>	N/A	N/A
<b>10. Biodiversity</b>	N/A	N/A
<b>11. Good urban design / the historic environment</b>	N/A	N/A
<b>12. Economic growth</b>	++	0

### Policy Options set 003a: Houses in Multiple Occupation (HMOs)

3.35 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:

- **Option a:** Prevent a concentration of HMOs in any area by only allowing a certain percentage of HMOs within a frontage or radius (currently this is 20%).
- **Option b:** Allow new purpose-built HMOs in appropriate locations, (potentially restricting the size of these in particular areas).
- **Option c:** Concentrate HMOs in certain areas so there is no restriction in particular areas and a complete or near complete restriction in others.
- **Option d:** Do not have any restriction on HMOs.

3.36 Option B is not really an alternative to the other options, but rather an additional element that could be incorporated alongside either option a, c or d.

*Table 3.7: Appraisal of options set 003a*

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	N/A	N/A	N/A	N/A
2. Resilience to climate change	N/A	N/A	N/A	N/A
3. Efficient use of land	+	+	+	+
4. Local housing needs	+/-	+/-	+/-	-
5. Inequalities	0	+	0	0
6. Services and facilities	N/A	N/A	N/A	N/A
7. Green infrastructure, leisure and recreation	N/A	N/A	N/A	N/A
8. Traffic and associated air pollution	N/A	N/A	N/A	N/A
9. Water	N/A	N/A	N/A	N/A
10. Biodiversity	N/A	N/A	N/A	N/A
11. Good urban design / the historic environment	0	+/-?	-?	-
12. Economic growth	N/A	N/A	N/A	N/A

#### Policy Options set 003b: Location of new student accommodation

3.37 Policy options that were considered, as discussed in detail in Background Paper 003, are as follows:



- **Option a:** Restrict the locations where new student accommodation would be allowed to: on or adjacent to existing or campus sites, existing student accommodation sites, district centres and the city centre (or potentially only parts of these or some of these) and existing student accommodation.
- **Option b:** Restrict the locations where new student accommodation would be allowed to: existing campus sites, existing student accommodation sites, district centres, the city centre and on arterial roads.
- **Option c:** Have no locational restriction on student accommodation but a criteria-based policy.
- **Option d:** Allow new student accommodation only on existing campus sites and on existing student accommodation sites.

3.38 The options set included additional options (Options E, F and G), which are not incorporated into the detailed appraisal as they address options for management of student accommodation, rather than options for spatial approach to location of this type of use which was considered to be the area where there could be significant effects that needed to be investigated further.

*Table 3.8: Appraisal of options set 003b*

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	N/A	N/A	N/A	N/A
2. Resilience to climate change	N/A	N/A	N/A	N/A
3. Efficient use of land	0	0	0	?
4. Local housing needs	+/-	+/-	+/-	+/-
5. Inequalities	N/A	N/A	N/A	N/A
6. Services and facilities	N/A	N/A	N/A	N/A
7. Green infrastructure, leisure and recreation	N/A	N/A	N/A	N/A
8. Traffic and associated air pollution	+	+	-	+
9. Water	N/A	N/A	N/A	N/A
10. Biodiversity	N/A	N/A	N/A	N/A
11. Good urban design / the historic environment	+	-	?	+
12. Economic growth	N/A	N/A	N/A	N/A

### Policy Options set 008c: Retrofitting existing buildings including heritage assets

3.39 Policy options that were considered, as discussed in detail in Background Paper 008, are as follows:

- **Option a:** Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.
- **Option b:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Expand on guidance through a Technical Advice Note.
- **Option c:** In relation to designated heritage assets and historic buildings, or proposals within conservation areas, set out that carbon reduction/ energy efficiency/climate adaptation measures will be considered as public benefits that may outweigh harm. Be explicit in setting out some key principles to follow, including the need for taking a Whole Building Approach to retro-fit. Additionally, set out in the policy the retro-fit measures that would be more or less likely to cause harm (e.g. permanent versus temporary), and how levels of harm would be assessed against public benefit. Expand on guidance through a Technical Advice Note.
- **Option d:** Do not include policy addressing retrofitting of existing buildings and/or heritage assets.

3.40 For the purposes of this assessment, options B and C are considered similar enough to be appraised together (the key difference is in how prescriptive the guidance around retro-fit measures would be in the policy wording, option B only setting key principles guiding design of retro-fit, option C going further and identifying specific measures that would be considered more/less harmful).

*Table 3.9: Appraisal of options set 008c*

SA Objective	Option A	Option B/C	Option D
1. Carbon emissions	+	+	0

SA Objective	Option A	Option B/C	Option D
2. Resilience to climate change	+	+	0
3. Efficient use of land	N/A	N/A	N/A
4. Local housing needs	N/A	N/A	N/A
5. Inequalities	+	+	0
6. Services and facilities	N/A	N/A	N/A
7. Green infrastructure, leisure and recreation	N/A	N/A	N/A
8. Traffic and associated air pollution	+	+	0
9. Water	N/A	N/A	N/A
10. Biodiversity	N/A	N/A	N/A
11. Good urban design / the historic environment	0	-?	0
12. Economic growth	N/A	N/A	N/A

#### Policy Options set 012d: Motor vehicle parking design standard

3.41 Policy options that were considered, as discussed in detail in Background Paper 012, are as follows:

- **Option a:** Seek low car residential development across the city, subject to criteria to ensure accessibility to public transport and local shops. Consideration will be given in the policy to setting a threshold for the numbers of pooled cars/ car club spaces because larger sites have more scope for successful carpooling and more space for essential vehicles.
- **Option b:** Adopt parking standards for residential developments
- **Option c:** Seek low car non-residential development across the city. This could vary by accessibility of the area of the city and/or existing parking levels.
- **Option d:** Adopt parking standards for non-residential developments

*Table 3.10: Appraisal of options set 012d*

SA Objective	Option A	Option B	Option C	Option D
1. Carbon emissions	+	-	+	+/-?
2. Resilience to climate change	N/A	N/A	N/A	N/A
3. Efficient use of land	+	-	+	+/-?
4. Local housing needs	+/-	0	0	0
5. Inequalities	-?	0	0	0
6. Services and facilities	N/A	N/A	N/A	N/A
7. Green infrastructure, leisure and recreation	N/A	N/A	N/A	N/A
8. Traffic and associated air pollution	+	-	+	+/-?
9. Water	N/A	N/A	N/A	N/A
10. Biodiversity	N/A	N/A	N/A	N/A
11. Good urban design / the historic environment	+	-	+	+/-?
12. Economic growth	0	0	+/-?	0

### 3.2.3. Identifying a preferred option for policies and reasons for rejecting other options

3.42 In most cases, the Regulation 18 consultation document sets out the preferred approach that has been put forward for each policy proposed for the Local Plan 2042. The relevant background papers (as highlighted in Table 3.5 earlier) set out in their concluding sections why the preferred approach has been taken forward for the various policies where applicable and why alternative options were not taken forward.

3.43 The Sustainability Appraisal has tested the potential options that the Council has considered for a selection of the policies where it was deemed that the options (or some of them) could have likely significant effects against one or more of the 12 SA objectives and the results of this testing were set out in the tables of the previous section. This testing has helped to identify which options perform most positively against the sustainability objectives, but has also indicated where the Local Plan may need to incorporate mitigations to avoid negative impacts. There is no obligation to take forward the option with the most positive (or fewest negative) sustainability impacts—there may also be additional

important considerations that need to inform the preferred approach—however, these findings help to more fully understand the potential for significant impacts arising from particular options and thus form an important factor in determining the preferred approach.

3.44 A summary of the reasoning for the preferred approaches to these scoped in options sets, particularly where this includes additional considerations beyond performance against the sustainability objectives, is included in Table 3.11.

*Table 3.11: Preferred options taken forward for policy options sets subjected to Sustainability Appraisal in this report and the rationale for this*

<b>Policy option set</b>	<b>Preferred option</b>	<b>Rationale – including other considerations beyond sustainability (if applicable)</b>
Housing requirement for the plan period (Option set 001a - proposed policy H1)	<b>Option B</b>	The preferred approach is to base the housing requirement on the housing capacity to ensure the policy is deliverable and meets the tests of soundness. Setting a housing requirement that meets or exceeds need is likely to be unachievable, and would mean that pressure would be placed on other policies aiming to meet the Plan' strategy. The option was better performing in the balance of positive and negative impacts against the sustainability objectives than the other options. Whilst it is acknowledged that the other options could have greater positive impacts in relation to delivering housing and economic growth, they also come at greater cost in terms of significant negative impacts against other sustainability objectives. Nevertheless, some mitigation will likely be needed to address negative impacts against SA criteria 1 (carbon emissions), 8 (traffic/air pollution) and 9 (water). <i>See conclusions section of Background Paper 001 for more detail.</i>
Employer-linked affordable housing (Option set 002e – proposed policy H6)	<b>Option A</b>	This option will allow, on specified sites listed in the Plan, developments of homes that are available only for employees who work for a specific listed organisations at an affordable rent level (as agreed with the local authority). The list of specified sites reflects willing landowners and sites that would otherwise not be available for residential uses, if they were not being developed for staff. The policy also requires legal agreements to ensure that the homes are truly affordable and are addressing identified housing needs, for example to agree an

Policy option set	Preferred option	Rationale – including other considerations beyond sustainability (if applicable)
		<p>allocations policy and rent levels. The option also had a greater number of positive impacts against the sustainability objectives than the other option tested.</p> <p><i>See conclusions section of Background Paper 002 for more detail.</i></p>
Houses in Multiple Occupation (HMOs) (Option set 003a – draft policy H9)	<b>Option A</b>	<p>This option will provide an opportunity for HMOs to come forward to meet needs in all parts of the city, but will avoid an over-saturation in any one length of street frontage, helping manage the potential impacts on amenity of this type of housing. It was also generally the better performing option in terms of impacts against the SA objectives according to SA testing, compared with its alternatives (options C and D). Option B might potentially have additional positive impacts, but this is an additional element that could be combined with the other options and addresses requirements for purpose-built HMOs. It is not part of the preferred approach because of its potential impacts in competing with delivering housing that meets greater needs (such as social rented housing).</p> <p><i>See conclusions section of Background Paper 003 for more detail.</i></p>
Location of new student accommodation (Option set 003b – draft policy H10)	Combination of <b>options A, E and F</b>	<p>The preferred approach recognises that there may be additional sites, beyond existing campus/student accommodation sites, which are particularly suited to this type of accommodation, potentially more so than general market housing, and it should help to achieve the high densities that these locations provide the opportunity for. It also includes a proposed approach for managing impacts from students.</p> <p>Options A, B, C and D were explored further through detailed testing in the SA. Options A and D scored fairly similarly in terms of impact, with slight nuances in the underlying impact against each SA objective, whilst options B and C had additional negative impacts.</p> <p><i>See conclusions section of Background Paper 003 for more detail.</i></p>
Retrofitting existing buildings including heritage assets (Option	Combination of <b>options A and B</b>	<p>The preferred approach establishes clear support for retro-fitting projects that help deliver benefits in relation to mitigating/adapting to climate change. It provides additional support to</p>

Policy option set	Preferred option	Rationale – including other considerations beyond sustainability (if applicable)
set 008c - proposed policy R3)		applicants in relation to designing proposals impacting sensitive traditional buildings/heritage assets. The combination of these options secures greater positive impacts against the SA objectives, though potential negative impact against SA obj 11 should be mitigated through wording of policy to ensure clear requirements for applications impacting historic/traditional buildings. <i>See conclusions section of Background Paper 008 for more detail.</i>
Motor vehicle parking design standards (Option set 012d – proposed policy C8)	Combination of <b>options A, B and C</b>	This is the preferred approach as it pushes for lower levels of parking provision in areas of the city that are suitable e.g. where they are accessible to public transport, but accepts that some parking will be needed in parts of the city and for people that rely on a vehicle e.g. for employment or those with a disability. In terms of effects against the SA objectives, the options have varying impact. Seeking low car where possible which will help to maximise positive sustainability impacts, but it is acknowledged that there could be some negative sustainability impact where higher levels of car parking come forward. <i>See conclusions section of Background Paper 012 for more detail.</i>

### 3.3. Developing Local Plan site allocations

3.45 This section discusses the process undertaken for developing site allocations for the Local Plan 2042.

3.46 The Regulation 18 consultation document in Chapter 8 sets out proposed Areas of Focus and specific site allocations that would be included in the full draft Local Plan at Regulation 19 stage. Site allocations are policies specific to a particular site in the city and would set out the types of land use, or mix of uses, which would be acceptable on a specific site, or protects the site for certain types of development. Areas of focus are broader areas where changes are anticipated over the Plan period resulting from new development and these will each have their own policy including some key development principles specific to that area, as well as containing a number of site-specific allocations.

3.47 Whilst the Regulation 18 consultation does not set out the specific policies for sites or Areas of Focus because work is still ongoing on preparing them, the intention is that the Regulation 19 consultation will set out full draft policies for these areas.

### 3.3.1. Identifying potential development sites in the city

3.48 In relation to developing housing allocations—the long-standing need for housing means that the Council seeks to pursue a ‘no stone left unturned’ approach when identifying land that might be suitable for accommodating future housing in the city. Potential residential or mixed-use development sites for allocation through the Oxford Local Plan 2042 have been identified from a range of sources, which have then fed into the SHLAA, including:

- Previously allocated sites in the Oxford Local Plan 2036 and any additional sites that were being considered in the Oxford Local Plan 2040
- Further sites submitted to the Oxford Local Plan 2040 Examination
- Sites in historic planning policy documents such as the West End AAP and Sites and Housing Plan
- Call for sites inviting landowners and others to nominate sites
- Employment sites
- Green spaces (filtered out for further investigation if they are part of the identified core infrastructure network)
- Commitments (sites with planning permission or Prior Approval for housing)
- Sites refused planning permission or with an extant permission which are potentially suitable for development
- Desk-based map survey.

3.49 In relation to employment allocations—the Council has also been reviewing employment land needs and assessing sites across the city as part of its Employment Land Needs Assessment (ELNA) workstream. This has helped to identify sites that should be allocated for employment development, as well as to update the Council’s understanding of existing employment uses that should be protected through employment-related policies.

3.50 Using these two workstreams, a large initial pool of potential sites for development has been identified, including housing sites and employment sites as well as some mixed-use sites.



### 3.3.2. Testing and refining site allocation for the Local Plan 2042

3.51 Many of the sites initially identified from the various sources informing the SHLAA and ELNA workstreams are, however, not ultimately suitable for allocation in the Local Plan 2042 for various reasons. For example, the presence of intrinsic environmental constraints such as national ecological designations (e.g. the SAC and SSSIs), or undeveloped land within the flood plain (flood zone 3b) may make development ultimately unsuitable, equally, some sites may be too small to warrant a specific allocation in the Local Plan. Additionally, to be put forward for allocation, the sites need to be considered in terms of deliverability, including whether a landowner has shown intent or willingness to bring forward a site for development. The list of initial sites are therefore subject to different types of assessment and refinement through the SHLAA and ELNA processes in order to identify those that the Council considers reasonable and deliverable.

3.52 As with previous Local Plans undertaken for Oxford, the Sustainability Appraisal process has been integrated into this site assessment/refinement process. This allows officers to streamline the procedure such that a single assessment can be carried out for each of the potential sites whilst also ensuring that sustainability considerations are intrinsic to developing site allocations. All sites that pass through the initial refinement as part of the SHLAA/ELNA workstreams and are identified as still having potential for allocation are subject to appraisal using the SA framework and its site-specific criteria as was outlined in Section 5.2 of the Sustainability Appraisal Part One report. Incorporating the work of the SHLAA and ELNA, alongside that of the Sustainability Appraisal, demonstrates that potential site allocations for the Local Plan 2042 have gone through a multi-stage process, as outlined in Table 3.12.

*Table 3.12: The multi-stage process of site assessment informing potential allocations for the Local Plan 2042*

<p><b>Stage 1a: Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints. Undertaken as part of the SHLAA*.</b></p> <p>First stage of assessment undertaken through the SHLAA considered conflicts with national policy or insurmountable environmental/physical constraints. Sites were then taken forward for further consideration as allocations for development at Stage 1a unless they were:</p> <ul style="list-style-type: none"> <li>• A Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI);</li> <li>• Greenfield in flood zone 3b;</li> <li>• Less than 0.25 hectares in area OR site does not have capacity to deliver 10+ net gain dwellings**;</li> <li>• Already at an advanced stage in the planning process (i.e. development has commenced).</li> </ul> <p><i>Although it should be noted that in some instances sites are still taken forward for further consideration even if one of the above applies.</i></p>
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<b>Stage 1b: Assessment against additional deliverability considerations. Undertaken as part of the SHLAA*.</b>
<p>All sites that had passed the Stage 1a assessment are considered at Stage 1b in terms of deliverability as part of the SHLAA process. Sites were then taken forward for further consideration as allocations for development unless:</p> <ul style="list-style-type: none"> <li>• They were extremely unlikely to become available during the plan period;</li> <li>• The landowner had indicated they have no intention to develop;</li> <li>• There was serious conflict with the National Planning Policy Framework/Oxford Local Plan Preferred Options strategy and no mitigation was possible.</li> </ul>
<b>Stage 2: Assessment against the SA/SEA objectives.</b>
<p>All sites that had passed the Stage 1a/1b assessment process were then considered against the SA/SEA objectives. Sites were scored accordingly based upon any identified positive/negative impacts against the twelve Sustainability Appraisal framework criteria.</p> <p><i>* The Strategic Housing Land Availability Assessment (SHLAA) can be referenced for further details.</i></p> <p><i>** Sites can still come forward during the Local Plan period as windfall development without the need for allocation.</i></p>

3.53 The first stages (1a and 1b) of filtering in the above Table are carried out across the SHLAA and ELA workstreams, and this results in a proportion of sites being assessed as not suitable for allocation in the Local Plan. The sites that passed Stage 1 of the assessment process can be shown to be deliverable at a high-level (as they do not have insurmountable barriers to allocation) and have then been subject to Sustainability Appraisal as part of stage 2. For sites that have passed onto Stage 2, an individual Site Assessment form has been completed, which documents the Sustainability Appraisal findings alongside the results from the assessment at Stage 1a and 1b for completeness, and these can be referenced in the consultation evidence base.

3.54 The site sustainability appraisal process helps to identify potential sustainability impacts that could arise from taking forward a particular allocation based on an initial desktop review of each site's context. The scoring undertaken documents where development on a potential site can positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

3.55 As the site allocations policies have not yet been drafted, some scoring in the SA appraisals published as part of the Regulation 18 consultation are pending further information and will need to be revisited as the Regulation 19 draft Local Plan is prepared.

### 3.3.3. Next steps for Local Plan 2042 site allocations

3.56 Following the Regulation 18 consultation, the Council will prepare and publish its submission draft Regulation 19 Local Plan which will include full site allocation policies.

As part of this process:

- Feedback from the Regulation 18 consultation will be considered.
- Additional work will be carried out to better understand the capacity of sites, including more detailed urban design assessment which will help inform the specifics of the allocation policies.
- Site assessment forms will be reviewed and sustainability appraisals updated where additional information is available for the proposed site allocations.
- Considerations around any mitigation that the Sustainability Appraisal of the sites indicates are needed will also be factored into the drafting of the site allocation policy if appropriate.
- The Regulation 19 Sustainability Appraisal report will compile and report back on this process.

## 4. Interim whole plan appraisal (Regulation 18 consultation preferred approaches)

4.1 Section 3 presented appraisals of different elements of the emerging Local Plan as presented for the summer 2025 Regulation 18 consultation. This included appraisals of overarching growth strategy alternatives, as well as a selection of the option sets for particular thematic policy areas which were identified as having potential to result in significant effects against one or more of the 12 SA objectives depending on which option was taken forward. The preferred options for the Local Plan in relation to these elements were also discussed, including:

- Pursuing a balanced approach to development for the Local Plan growth strategy with a primary focus on housing (option 1a as per Tables 3.1 and 3.2).
- Following the particular options for the thematic policies screened into the SA appraisal as set out in Table 3.11 at the end of sub-section 3.2.
- Additionally, preferred options have been put forward for other policy areas in the Local Plan, the process for coming to these draft policies is set out within the relevant background papers as were documented in Table 3.4.

4.2 The Regulation 18 consultation sets out a picture of the emerging Local Plan 2042 and the Council's preferred approaches but there are also areas where detail will continue to be refined and developed up to the Regulation 19 submission draft Local Plan, including specific requirements and thresholds within certain policies as well as full site allocations policies.

4.3 Nevertheless, to conclude the Part 2 report, a high-level interim whole plan appraisal is now presented (Table 4.1) which helps to better understand the impacts of the Local Plan in its entirety and begin to identify where particular mitigations are needed to address potential negative effects. This will need to be revisited more comprehensively, including scoring of impacts against the SA objectives, as part of the Regulation 19 consultation and once the full detail of the Local Plan and its allocations are available.

*Table 4.1: Interim whole plan appraisal based upon preferred approaches set out in the Regulation 18 first draft Local Plan*

SA Objective	Interim whole plan appraisal commentary
<b>1. Carbon emissions</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy option (as with the alternatives) is likely to have a negative impact for carbon emissions due to the additional growth it supports. There will therefore be a need for mitigation to help avoid these effects and support meeting local and national net zero carbon targets.</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<ul style="list-style-type: none"> <li>• The Reg 18 document includes policies aimed at delivering net zero carbon buildings in operation, reducing embodied carbon impacts and supporting retro-fitting. These proposed policies will help to ensure new development goes further than national standards in delivering highly efficient buildings that have a reduced impact on emissions and the wider environment.</li> <li>• It is likely that some level of emissions will continue in relation to upfront carbon/embodied carbon associated with the construction process and lifetime of the building, however the plan proposes policy to begin to secure reductions in this and form a stepping stone to stronger policy in future as guidance/understanding improves. Also, retro-fit policy cannot force occupants to retro-fit existing policy, in this regard the Local Plan has limited influence but can help to enable and support projects where they come forward.</li> <li>• The retro-fit policy options (option set 008c) were scoped in to be tested through the SA to better understand impacts of different policy approaches against the SA criteria, particularly in relation to impacts on carbon emissions but also the wider historic environment. The testing identifies that having a policy on retro-fit offers opportunities for positive impacts against this objective and others like 2. resilience to climate change and 8. Air pollution. It also flags that having policy supporting retro-fit on historic buildings could have negative impacts for 9. urban design/heritage, (though this depends on implementation and the draft policy does guide applicants to follow a Whole Building Approach in order to reduce this risk).</li> </ul>
<b>2. Resilience to climate change</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy option would be the most beneficial for maintaining and driving additional resilience to climate change, helping to ensure space for development is balanced with space for resilience features like greening and SUDs as part of development sites. It also seeks to protect a network of green infrastructure which has benefits for flood storage, slowing run off and cooling.</li> <li>• Resilience to climate change is likely to be an ongoing issue as climate continues to change throughout the Local Plan period. The Local Plan can play an important role in ensuring resilience is a key consideration in the design process, helping to avoid development that introduces additional risks (e.g. maladaptation). It can also help to introduce additional features that can improve resilience of existing areas (such as allowing sensitive redevelopment of existing poorly adapted sites within flood zones rather than allowing them to stagnate – as is part of the preferred approach to the Local Plan’s flood risk policy).</li> <li>• Preferred approaches set out in chapter 4 to drive additional greening and biodiversity features, whilst protecting existing features including land within floodplain can help to secure flood storage and slow surface water run off, but also deliver cooling and areas of reprieve during intense heat.</li> <li>• Chapter 5’s draft policies for energy efficiency linked with net zero can improve fabric performance of buildings helping to keep heat out in summer as much as keeping it in during winter. The proposed water quality</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	policy would help to ensure new development includes measures that conserve water and mitigate impacts on water supplies (as discussed further below).
<b>3. Efficient use of land</b>	<ul style="list-style-type: none"> <li>• The space-constrained nature of the city means that efficient use of land remains a key issue for the Local Plan. The preferred growth strategy option is the most efficient in terms of maximising available land for housing in order to meet the significant need for housing whilst also seeking to meet the range of other Local Plan objectives. The approach is brownfield first and seeks to protect a network of green infrastructure, but acknowledges that some green spaces could reasonably be developed to help contribute to growth needs.</li> <li>• The preferred growth strategy option permeates throughout the preferred options put forward in the Regulation 18 consultation. The housing requirement seeks to meet as much identified need as possible across available housing sites in a sustainable way. The strategy for employment includes an allowance for an element of housing to come forward on employment sites, and for some less-performing employment sites to be redeveloped for housing. Additionally, a specific draft policy is put forward that seeks to encourage the most efficient use of land, setting out various considerations that should guide applicants towards achieving the most appropriate densities to make best use of available sites.</li> </ul>
<b>4. Local housing needs</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy option provides a positive impact for contributing to housing needs though some level of unmet need is likely due to constraints on land in the city. It seeks to maximise capacity across sites in the city whilst also balancing other Local Plan objectives.</li> <li>• The different policy options being considered by the Council in relation to setting the Local Plan housing requirement were appraised through the SA because of the potential for significant effects against some SA objectives. The appraisal testing reflects the balanced overarching growth strategy, securing positive impacts for housing whilst limiting significant negative impacts against environmental sustainability objectives.</li> <li>• The quantitative housing requirement figure is one consideration in meeting housing need. Other considerations include meeting the needs for different types and sizes of homes, and affordability. There are a range of additional policies not tested through the SA appraisal which are proposed for the Local Plan 2042 to help deliver upon needs for particular groups such as affordable housing, elderly persons' housing and a mix of housing sizes to meet needs of different sized households. The effect of these policies may have some impact on capacities of sites and amounts of overall housing that come forward, but this will depend upon implementation and particular context of each site. Nevertheless, they are important for addressing varying housing needs across Oxford's communities.</li> <li>• Identifying the capacity across the city is an iterative process, and further work is ongoing to refine the assessment of capacity. In particular, more detailed site assessment work is ongoing, and that will inform site</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<p>allocations and refine the capacity assumptions for those sites, for the Regulation 19 Local Plan. This work will be subject to further SA to inform the submission draft Local Plan.</p>
<b>5. Inequalities</b>	<ul style="list-style-type: none"> <li>• The impacts of the preferred growth strategy option were found to be uncertain and highly dependent on implementation for this objective (as for all the alternatives tested). The scoping work and background paper 010 (Health and Wellbeing) identify that Oxford is an unequal city, with significant variation in outcomes between different communities. It is likely that the preferred growth strategy will make some contribution to addressing elements of inequality, such as access to affordable housing or access to jobs, but this will depend on how development comes forward.</li> <li>• The Regulation 18 consultation includes draft policies that seek to guide development towards unlocking positive outcomes for inequalities wherever possible. Draft policy HD10 sets requirements for Health Impact Assessments (HIAs) to be undertaken for major development which should help to ensure the design process is tailored towards avoiding negative impacts on health (including exacerbating inequality) and maximising opportunities to create positive impacts.</li> <li>• In relation to housing, various draft policies in chapter 2 set requirements for meeting particular housing needs, like affordable housing, housing for particular groups, meanwhile, other design policies help to ensure the quality of housing is addressed (e.g. wheelchair accessibility, space standards, privacy and daylight). The Regulation 18 consultation also puts forward draft policies that seek to respond to economic inequality in the city as is discussed in greater detail against objective 12 below.</li> <li>• The preparation of the Local Plan is also being supported by a separate Health Impact Assessment, of which a scoping report has been published as part of the summer 2025 consultation. This identifies in greater detail the key issues for health and wider inequality that the Local Plan will need to respond to and identifies key policy areas that can help address particular issues. The intention is for the HIA to continue to inform the subsequent Regulation 19 Local Plan.</li> </ul>
<b>6. Services and facilities</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy option was appraised as having some positive and some negative impacts for services and facilities. More housing on brownfield sites in the city can help to ensure more people live in areas that have good access to a range of services/facilities (equating to a positive impact), however, it was noted that this could bring additional pressure for existing services/facilities (equating to negative impact).</li> <li>• The Regulation 18 consultation includes various draft policies that would help to mitigate the potential negative noted above, particularly the policies in chapter 7. For example, draft policies that seek to define city/district/local centres (draft policy C1) and maintain these as vibrant areas (draft policy C2), which is important for maintaining the functions of these highly accessible locations for meeting various daily needs. There are also a range of other policies in the chapter which seek to protect a range of specific community, institutional, social and cultural facilities.</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<ul style="list-style-type: none"> <li>Alongside the emerging Local Plan, the Council is preparing updates to its Infrastructure Delivery Plan, which plays an important role in identifying the infrastructure needs to support growth across the plan period, including community infrastructure needs. This helps to identify specific needs and funding requirements which can be used to guide investment from a range of sources including developer contributions which can help mitigate impacts of new development.</li> <li>Whilst the above can help mitigate impacts somewhat, there is an element of uncertainty about the Plan's impacts on this objective. Elements of the plan are still emerging, such as site allocations, which means the impact of developing sites (particularly larger sites) will need to be appraised at the next stage of plan preparation. There are other factors outside the Plan's influence too, for example, previous changes to the use class system (e.g. introduction of use class e) and national permitted development rights, make it harder for the planning system to control changes in some uses that can include services/facilities.</li> </ul>
<b>7. Green infrastructure, leisure and recreation</b>	<ul style="list-style-type: none"> <li>The preferred growth strategy option provides for the most beneficial approach to protecting high-quality, multifunctional green infrastructure in the city, whilst also seeking to ensure new development comes forward in a way that allows additional greening onsite. It does allow some greenfield sites to be developed where they are not protected for particular benefits, recognising the significant lack of developable land.</li> <li>Preferred approaches set out in the Regulation 18 consultation include policy which designates a hierarchy of green spaces with additional protection above national policy, recognising the variety of benefits they provide, many of which arise from their specific location (e.g. acting as flood storage within flood plain, or contributing to setting of heritage assets). The spaces are also important for supporting recreation either informally (e.g. parks) or more formally (such as playing pitches). Other elements of the policies seek to protect features like trees and watercourses.</li> <li>The proposed Urban Greening Factor would seek to ensure that baseline levels of greening on sites are not lost to development whilst additional greening is secured on sites that fall below the targeted standard. Other elements of the draft policies seek to guide quality of greening coming forward, requirements for new open space, and requirements for maintenance/management.</li> <li>Additional evidence is being prepared in relation to playing pitches which will help to refine the approach to addressing playing pitch needs as the Regulation 19 Local Plan is prepared. Additionally, the ongoing site allocations workstream will help to inform particular greening requirements on allocations, including site-specific needs.</li> </ul>
<b>8. Traffic and associated air pollution</b>	<ul style="list-style-type: none"> <li>The preferred growth strategy was scored as having positive and negative impacts for this objective. Additional housing in the city could help to reduce in-commuting by providing additional housing for workers in the city, but equally, more housing could increase car ownership, depending</li> </ul>



SA Objective	Interim whole plan appraisal commentary
	<p>on implementation. The impact of private vehicles on emissions is likely to continue to reduce in the long term due to various county transport measures (e.g. Low Emission Zone, electrification of bus fleet etc.), and national phasing out of fossil fuel vehicles, (though this trend is longer term).</p> <ul style="list-style-type: none"> <li>• The SA tested the impact of the options set for Motor vehicle parking design standards because the options (which included variations on local parking standards or low car parking standards for residential and/or non-residential development) were deemed to have potential variations in effect, on this objective and others. The preferred approach to the policy is a mixture of some options. It is recognised that whilst there are important drivers for pushing for low car wherever possible in the city, particularly around areas that are accessible by public transport, (and these would be more positive scoring under the SA testing), there are still some groups that rely on private vehicles (e.g. some workers and some with disabilities). The drafting of the policy seeks to mitigate negative impacts wherever possible through providing clear requirements as to where low car is expected in the first instance.</li> <li>• The Regulation 18 consultation draft includes various other draft policies which can help to mitigate negative effects of the preferred growth strategy. A specific Air Quality (draft policy R4) policy seeks to ensure new development considers and mitigates impacts on air quality specifically. Bicycle parking standards (draft policy C5) are helpful for reducing congestion and reliance on private vehicles by seeking to increase uptake of cycling by ensuring development makes space for people to store these. Equally, the district and local centres policy (draft policy C1) helps to ensure that people's daily needs are supported by locating these uses in easily accessible locations without needing to rely on private vehicles. Additionally, the draft net zero carbon buildings policy (draft policy R1) will help to reduce impact from fossil fuel heating systems in new buildings; whilst the amenity policy (draft policy R8) seeks to ensure impacts from dust and other construction practices are appropriately managed.</li> </ul>
<b>9. Water</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy will introduce additional demands for water as with any new housing, however, the balanced approach to development will allow for the best outcomes in terms of mitigating impacts on the sensitive water environment. This is important as Oxford is located in a water stressed region and has ongoing water quality challenges in its watercourses (due to pollution from a range of sources).</li> <li>• Draft policies proposed for the Local Plan include a new water quality policy which seeks to ensure that new development that does come forward uses water prudently and takes up opportunities to conserve and reuse water whilst mitigating impacts on the water environment through measures like SUDs and pollution control. This should help to mitigate impacts associated with growth.</li> <li>• In addition, requirements set out in draft policy G2 include that development adjacent to watercourses incorporates sufficient buffers and</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<p>takes up opportunities to renaturalise embankments. Meanwhile, requirements for additional greening as outlined in chapter 4 will help to enhance natural surface cover and reduce urban run-off, which will help with reducing risks of overwhelming sewage systems during high rainfall events, and also help to filter out pollutants before runoff reaches watercourses.</p> <ul style="list-style-type: none"> <li>• Ongoing discussions between the City Council, the Environment Agency and Thames Water have helped to agree an upgrade scheme needed for the Oxford Wastewater Treatment Works, which processes wastewater from development in the city. This is expected to allow capacity for the development of new homes in and around Oxford and is an important solution for helping to mitigate water quality impacts from future growth. It will be important for the three bodies to continue to work together as the Local Plan develops to ensure the safeguarding of the water environment over the plan period.</li> </ul>
<b>10. Biodiversity</b>	<ul style="list-style-type: none"> <li>• The impact of the preferred growth strategy options was assessed as being neutral for biodiversity. The balanced approach to growth allows for protection of a network of green and blue spaces including designated sites and sites with informal benefit for biodiversity, including corridors that help species to move across the city. The approach also allows onsite capacity to be balanced with other objectives such as incorporating open space and greening which can support biodiversity.</li> <li>• The Regulation 18 consultation does include draft policies that seek to boost provision for biodiversity onsite, such as the draft policy G5's ecological enhancements requirements. Requirements for greening as touched upon in comments under SA objective 7 can also have beneficial impacts for supporting species in the city.</li> <li>• Biodiversity Net Gain will of course be required on all applicable applications regardless of the Local Plan, this should bring new habitat for supporting biodiversity, although it is unclear how much of this will be able to be delivered onsite in many of Oxford's constrained areas. Where this needs to be provided offsite, draft policy G4 seeks to steer this towards areas identified in the upcoming Local Nature Recovery Strategy (LNRS) in the first instance, and ideally within the city before other locations are considered.</li> <li>• The ongoing site allocations work will need to consider the biodiversity potential of any potential sites to be allocated at Regulation 19 stage. Biodiversity considerations form a part of the site assessment process and where potential conflicts occur, the potential for mitigation to address these impacts will need to be considered. Additionally, as the LNRS is finalised, considerations in relation to opportunity areas identified in that strategy may need to inform the Regulation 19 Local Plan approach.</li> </ul>
<b>11. Good urban design / the historic environment</b>	<ul style="list-style-type: none"> <li>• A prominent variable between the growth strategy alternatives appraised for the Local Plan is how factors such as driving high-quality design and preserving Oxford's most sensitive and special historic assets and</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<p>townscape setting are balanced with securing higher quantum/densities of development across the city.</p> <ul style="list-style-type: none"> <li>• The preferred growth option seeks to avoid the most significant negative impacts against this SA objective which are likely under the alternatives appraised that drive for maximising development quantum/densities. Vice-versa, it delivers the most significant positive benefit in relation to high-quality design, on the assumption that this requires a balancing of various types of uses on sites—meeting growth needs whilst ensuring this is sustainable.</li> <li>• Policy options sets for HMOs and Student Accommodation were appraised through the Sustainability Appraisal with one factor being considered being the potential for certain options to have significant effects with regard to amenity and the character of local areas, which has some relevance to this SA objective. The preferred options taken forward are those that seek to balance meeting needs for these particular types of housing in the city whilst also seeking to avoid negative sustainability impacts from over-proliferation of these types of housing and the ensuing amenity impacts that can arise (e.g. noise, parking, loss of local character).</li> <li>• The Regulation 18 consultation also includes a suite of draft policies as part of chapter 6 which seek to guide applicants towards conserving and enhancing different elements of the historic environment (including nationally designated assets as well as local non-designated assets and archaeology). Alongside these heritage policies, there are a number of draft policies which promote high-quality design, as well as detailed design checklist which forms part of the appendix of the plan and guides applicants through various considerations that align with the 10 components of good design as set out in the National Design Guide.</li> <li>• As the Council prepares its Regulation 19 Local Plan, it is envisaged that detailed assessments will be undertaken to inform the site allocations. Part of this workstream will include urban design assessments that can help to ensure local contextual factors guide the requirements in the site allocations policies and that these policies can seek to provide as much design guidance as possible in relation to what should come forward on these sites.</li> </ul>
<b>12. Economic growth</b>	<ul style="list-style-type: none"> <li>• The preferred growth strategy option would bring positive impacts for the economy and support new homes in the city - helping to address a key barrier to economic growth. The strategy seeks to protect Oxford's most important, or "key" employment sites (including local and nationally important ones) and focuses new employment-generating uses (i.e., Use Classes E(g), B2 and B8) towards these sites through a process of modernisation and intensification. It supports the delivery of housing on non-designated employment sites, while allowing the loss of employment floorspace to other uses on key employment sites, providing certain conditions are met.</li> <li>• The strategic choice to focus on housing, coupled with the provisions to allow some loss of employment land over the plan period, could make it</li> </ul>

SA Objective	Interim whole plan appraisal commentary
	<p>more challenging to provide for the city's identified employment need. On-going work on the plan's employment evidence base - the Employment Land Needs Assessment (ELNA) - and the site allocations will help to refine this further. Where risk is identified, detailed policy wording can help mitigate this.</p> <ul style="list-style-type: none"> <li>• However, as noted in the appraisal findings for the growth strategy alternatives testing, whilst the preferred option is likely to result in overall positives for economic growth, there are risks that the high-performing economy, including large rental incomes for particular types of employment (e.g. grade A offices and labs) could leave behind or push out smaller businesses. This effectively results in market failure to provide for micro businesses and SMEs which could have ramifications where these are pushed outside the city (e.g. more commuting, reduced economic diversity in city). As such, the Regulation 18 consultation proposes a draft policy aimed at securing affordable workspaces on some of the larger employment sites in the city.</li> <li>• Additionally, the Regulation 18 consultation proposes a range of other draft policies aimed at supporting different elements of the economy, such as policy E2 addressing warehousing and storage uses (an important element for some businesses in the city) and policy E5 tourism and short stay accommodation. Also, requirements for employment and procurement plans in draft policy E3 are aimed at securing additional benefits for local communities in terms of developing skills and providing training/experience, which can contribute opportunities to those who are struggling to find employment at present (also helping to address economic inequalities).</li> </ul>

4.4 The interim whole plan appraisal set out above identifies that emerging elements of the Local Plan 2042, including the preferred growth strategy and individual policies, could have a range of impacts. It begins to highlight how needs for mitigation are being factored into proposed policies in order to address potential negative effects (such as in regard to carbon emissions or impacts on natural resources like water and air), as well as how opportunities are being taken to secure additional positives from development (e.g. additional greening, biodiversity enhancements and provisions to meet the needs of smaller businesses in the city).

4.5 The Regulation 19 Sustainability Appraisal will need to revisit this appraisal and update it in order to take into account the additional detail of the Local Plan 2042 which is not yet available, particularly in relation to site allocations as well as additional evidence being prepared to support the Local Plan. The updated appraisal will also be able to fully take into account the likely effects of the Local Plan as a whole and may potentially identify other impacts that will necessitate measures that can help prevent, reduce and offset these where needed.

## 5. Conclusions and next steps

5.1 This Part 2 report, accompanying the Regulation 18 first draft Local Plan 2042 consultation, has presented the appraisal of options and alternatives for the emerging Local Plan. Together with the Part 1 report, which covered the Sustainability Appraisal scoping stages, these set out how the Council has carried out stage A and B of the Sustainability Appraisal process, as set out in Table 5.1.

*Table 5.1 The Sustainability Appraisal (SA) process and expected stages of Local Plan 2042 preparation including tasks covered in this report.*

<b>Stages of the Sustainability Appraisal process</b>	<b>Relevant consultation</b>
<u>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</u> Task A1: Identify other relevant policies, plans and programmes and sustainability objectives Task A2: Collect baseline information Task A3: Identify key sustainability issues and problems Task A4: Develop the SA framework Task A5: Consult the consultation bodies on the scope of the SA report	Relevant bodies* were consulted on early draft to agree scope (Feb-March 2025) <b>Complete</b>  Updated version published as Interim SA Report Part 1 for Summer 2025 Reg 18 consultation <b>Current stage</b>
<u>Stage B: Developing and refining alternatives and assessing effects</u> Task B1: Test the Local Plan objectives against the SA framework Task B2: Develop the Local Plan options including reasonable alternatives Task B3: Evaluate the likely effects of the Local Plan and alternatives	Published as Interim SA Report Part 2 for Summer 2025 Reg 18 consultation <b>Current stage</b>
Task B4: Consider ways of mitigating adverse effects and maximising beneficial effects Task B5: Propose measures to monitor significant effects of implementing the Local Plan  <u>Stage C: Prepare the SA report</u>  <u>Stage D: Seek representations on the SA report from consultations and the public</u>	Will be published as part of late autumn 2025 Reg 19 consultation, also including updated information related to earlier stages where necessary
<u>Stage E: Post adoption reporting and monitoring</u> Task E1: Prepare and publish post-adoption statement Task E2: Monitor significant effects of implementing the Local Plan Task E3: Respond to adverse effects	To be published post examination

\* The Environment Agency, Historic England and Natural England.

5.2 The Whole Plan appraisal as presented in Section 4 of this report begins to discuss at a high-level how elements of the emerging Local Plan seeks to mitigate adverse and maximise beneficial effects (Task B4 in Table 5.1), however, this will need to be developed

further as the full submission draft Local Plan is prepared following the summer consultation. The Council will also need to set out the monitoring framework intended to monitor significant effects arising from implementing the new Local Plan.

5.3 Following the Regulation 18 consultation, the Council will prepare and publish its Regulation 19 submission draft Local Plan. The Regulation 19 consultation will be accompanied by a full Regulation 19 Sustainability Appraisal report which will:

- Report back on a summary of key feedback received at Regulation 18 and identify where any changes have been incorporated.
- Review the findings of Parts 1 and 2 of the Regulation 18 Sustainability Appraisal work and update any information where relevant.
- Revisit Tasks A1 to B3 in light of full draft proposals, as well as Task B4 of Table 5.1 - meaning appraising the full draft Local Plan, including proposed policies and site allocations, with consideration of: likely effects of the Local Plan as drafted, as well as any mitigation needed for adverse effects, or opportunities to maximise benefits.
- Propose measures to monitor significant effects of implementing the Local Plan 2042 (Task B5 of Table 5.1).

5.4 Comments on this Sustainability Appraisal report can be made as part of the Local Plan 2042 Regulation 18 consultation.