Oxford Local Plan 2042

Interim Sustainability Appraisal report - Part one (Scoping)

1. Introduction

1.1 This report, comprising Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) scoping, accompanies the Regulation 18 first draft Local Plan 2042 consultation. This chapter gives a high-level introduction to the city of Oxford; discusses the emerging Oxford Local Plan 2042, as well as the requirements of SA and SEA; and then sets out the structure of the rest of this scoping report.

1.1. Background to Oxford City

1.2 Oxford City Council is a district council at the heart of Oxfordshire. It has a total area of about 46 km^2 (17.6 miles^2), parts of which are very densely developed. The built-up area of the city extends to the administrative boundary around much of the eastern half of Oxford, but the river corridors of the Thames and Cherwell penetrate as extensive green wedges into the heart of the city. This uneven distribution of urban and rural landscapes gives Oxford a distinct physical form, with much of the residential population concentrated to the east of the city centre (Figure 1.1).

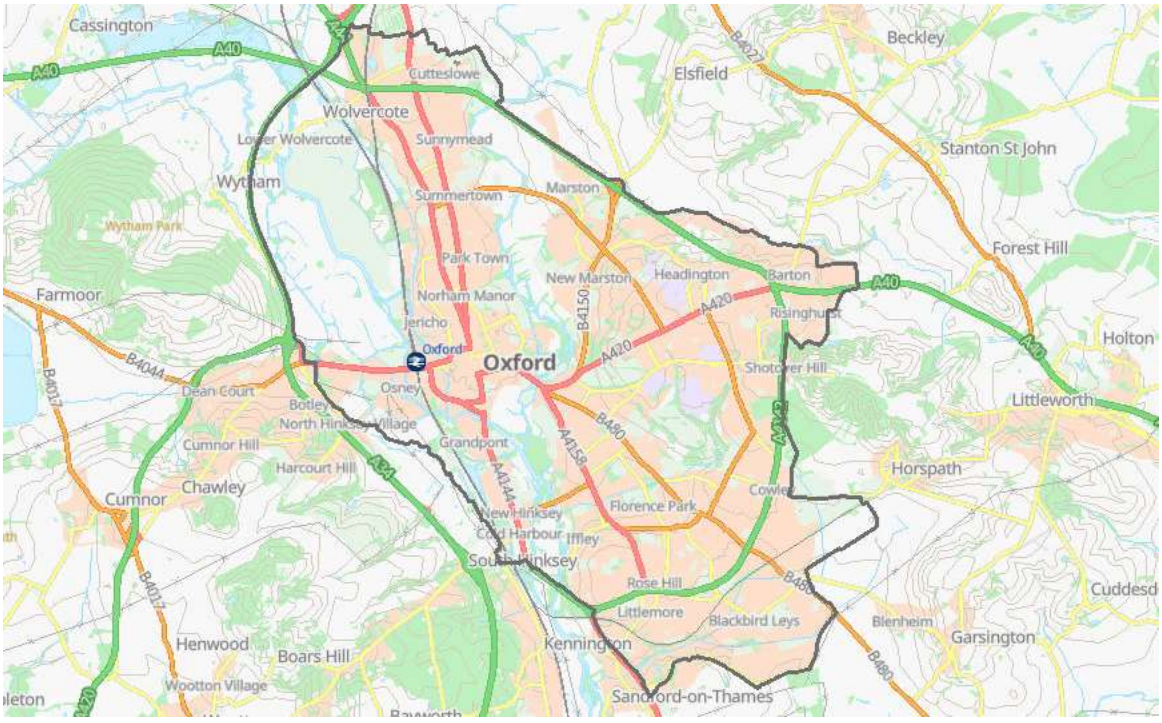

Figure 1.1: Map of Oxford including administrative boundaries of the City Council (© Crown Copyright and database right 2024. Ordnance Survey AC0000808820.)

1.3 Oxford's population is approximately 165,184 according to ONS mid-year population estimates for June 2023 (July 2024 release). The 2021 census estimated that one-third of the population is aged between 18 and 29, more than double the national

average. Oxford is home to 34,945 students, and 4,885 businesses providing 131,000 jobs. There is a high level of in-commuting in the city with the 2021 census recording that of the 57,315 commuters working in Oxford, 28,342 were from outside the city (*although the 2021 census data is likely to have been influenced by the Covid-19 lockdown measures including requirement to stay at home where possible*).

1.4 Oxford is a compact city with a unique and world-renowned built heritage which draws many visitors each year. Its original Saxon street pattern and some of the earliest buildings and monuments still survive. Around 27% of Oxford is within the Green Belt which is an important contributor to the city's historic setting and, unusually, not only constrains development in the outer cordon of the city, but also through the city's heart. Oxford sits at the confluence of the Thames and Cherwell rivers and is quite flat, so it is prone to flooding from a range of sources. The rivers form an intrinsic part of the unique environment of the city and promote tourism and a range of important water-based sports and social activities in the city. The historic city parks and nature conservation areas create pockets and corridors of green within the administrative boundary; several have national and international nature conservation designations, further constraining development, and a number of green spaces also contribute to the historic character of the city.

1.5 Oxford is one of the most unaffordable places to live in the country. In recent years, Oxford has experienced a booming housing market with rising house prices. This has led to open market housing becoming expensive and difficult to obtain. It has also limited the supply of affordable housing, and there is now a huge need for affordable housing. There are severe pressures on the housing stock, with concentrations of Houses in Multiple Occupation, many homeless and vulnerable people, and areas of deprivation with relatively high crime rates, health deprivation and poor educational achievement.

1.6 Oxford has remained economically very successful despite the global recession of the 2000s, Brexit and the Covid pandemic. The government sees Oxford as playing a key role within the 'Pan-Regional Partnership' between Oxford and Cambridge, with high future housing and economic growth.

1.2. The Oxford Local Plan 2042

1.7 Following the withdrawal of the emerging Oxford Local Plan 2040 from examination in 2025, work is now commencing on the Oxford Local Plan 2042. For now, the currently adopted Local Plan 2036 will continue to be the key document containing statutory planning policies (alongside neighbourhood plans). A considerable amount of resource and effort went into the preparation of the withdrawn Local Plan 2040, including multiple rounds of consultation, and much of this forms an important basis informing the

approaches that will be set out in the Local Plan 2042. Equally, the process of preparing this new iteration of the Local Plan for examination will offer new opportunities to revisit and reappraise the policy framework that it will eventually establish.

1.8 The Local Plan 2042 will propose site allocations for housing and employment. It will also set policies for the management of development in the city including: the conservation and enhancement of the historic and natural environment, including biodiversity; guiding the quality of urban design; achieving the city's net zero targets and flood risk management. Ultimately, the Local Plan will be used in determining planning applications and helping guide investment decisions across the city.

1.9 Development of the Oxford Local Plan 2042 will be carried out over a number of stages as are set out in Table 1.1 Ultimately, the aim will be to submit the Local Plan for examination in 2026, after which the timetable is not within the City Council's control. Based upon the previous examination for the Oxford Local Plan 2036, the City Council expects the examination period to be around 15 months (from submission to adoption), this means that the new Local Plan would be expected to be adopted in summer 2027.

Table 1.1: Stages in the development of the Local Plan 2042

Stage	**Expected date**
Early engagement consultation	17th March to 28th April 2025
First draft Local Plan (Regulation 18) consultation	Summer 2025 (this consultation)
Pre-submission draft Local Plan (Regulation 19) consultation	Late autumn 2025
Submission of the Local Plan for examination	Spring 2026
Expected adoption of the Local Plan (subject to timings of examination)	Summer 2027

1.3. Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)

1.10 The Environmental Assessment of Plans and Programmes Regulations 2004, SI No. 1633 (hereafter the "SEA Regulations") is the governing legislation in England and Wales that manages the Strategic Environmental Assessment (SEA) process. While the SEA legislation focuses on assessing environmental effect, this assessment process is widened to include an analysis of social and economic effects through the legal requirement to undertake a Sustainability Appraisal (SA) set out in Section 19 of the Planning and Compulsory Purchase Act 2004. According to the Planning Practice Guidance (PPG) section on Strategic environmental assessment and sustainability appraisal, "Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local

planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation.

1.11 The SEA Regulations state that SEA must assess the likely significant effects of the plan or programme on the environment, namely:

- Biodiversity
- Population
- Human health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage, including architectural and archaeological heritage
- Landscape
- The inter-relationship between the above

1.12 There are various requirements of the SEA Regulations and Table 1.2 highlights these as well as where they are covered in the SA/SEA for the Oxford Local Plan 2042.

Table 1.2: Requirements of the SEA Regulations and where they are covered in the SA/SEA for the Oxford Local Plan 2042

Requirements of the SEA Regulations	**Where covered**
a) an outline of the contents, main objectives of the plan or programme…	Briefly in Sec. 1.2 of this part one report. Will be done in more depth in the SA/SEA report, once the plan has been further developed
… and relationship with other plans or programmes	Sec. 2 of this part one report, and in individual Background Papers
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sec. 3 of this part one report and in individual Background Papers
c) the environmental characteristics of the areas likely to be affected	Will be in the SA report, once possible development sites are defined
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Habitat Regulations;	In individual Background Papers, and summarized at Sec. 4 of this part one report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any	In individual Background Papers

Requirements of the SEA Regulations	Where covered
environmental considerations have been taken into account during its preparation;	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects);	Discussed in the part 2 report sec 3 and 4. Will be expanded upon where necessary in the SA report at the Reg 19 consultation once the Local Plan is further developed
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Some initial discussion in part 2 report Sec 3 and 4. Will be expanded upon where necessary in the full SA report at Reg 19 consultation, once the Local Plan is further developed.
h) An outline of the reasons for selecting the alternatives dealt with…	Discussed in the part 2 report Sec 3.
… and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sec 1.6 of this part one report and will be revisited for the full SA report at the Reg 19 consultation.
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Will be in the full SA report at the Reg 19 consultation.
j) a non-technical summary of the information provided under the above headings.	See non-technical summary will be revisited for the full SA report at the Reg 19 consultation.
Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4)	This interim SA report, including scoping report, is the report put out for consultation at this stage. An early draft was also shared in early 2025 for feedback.
authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	This interim SA report is being published alongside the Reg 18 first draft local plan consultation. A full SA

Requirements of the SEA Regulations	Where covered
	report will be published alongside Reg 19 consultation.
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9 and 10)	Will be carried out upon plan adoption
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Will be carried out from after plan adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	Throughout the process

1.13 Sustainability appraisal is an iterative process to assist in the development of a Local Plan. It is used to appraise emerging options against the three elements of sustainability; the social, environmental and economic dimensions. It assists in selecting the options deemed to be the most sustainable for the area, and in fine-tuning the policies in the Local Plan. Ultimately, the SA documents 'the story' of the Local Plan's development.

1.14 There are different requirements for undertaking an SA compared to those for SEA; the requirements for undertaking SA are outlined in Table 1.3 below. This SA/SEA report fulfils the legal requirements for both SA and SEA; where reference is made within this document to sustainability appraisal, it also implies (where appropriate) strategic environmental assessment.

Table 1.3 The Sustainability Appraisal (SA) process and expected stages of Local Plan 2042 preparation

Stages of the Sustainability Appraisal process	Relevant consultation
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope 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) **Complete** Updated version published as Interim SA Report Part 1 for Summer 2025 Reg 18 consultation **Current stage**
Stage B: Developing and refining alternatives and assessing effects 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 **Current stage**
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 *Stage C: Prepare the SA report* *Stage D: Seek representations on the SA report from consultations and the public*	Will be published as part of late autumn 2025 Reg 19 consultation, also including updated information related to earlier stages where necessary
Stage E: Post adoption reporting and monitoring 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*.

1.15 The colour coding system as set out in Table 1.4 will be used throughout this SA/SEA. It is intended to score whether a positive, negative, neutral or unclear impact could arise as compared to the current baseline for the city and is as follows:

Table 1.4: 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**

Description of impact	Scoring symbol
Some positive and some negative impacts	+/-
Negative impacts (compared to the current situation)	-
Very negative impacts (compared to the current situation	--
Unclear	?

1.4. Habitat Regulations Assessment

1.16 Oxford is home to part of the Oxford Meadows Special Area of Conservation (SAC), which is a site of international nature conservation importance because of its lowland hay meadows and creeping marshwort (Apium repens). The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Port Meadow is the largest of only two known naturally occurring sites in the UK for creeping marshwort.

1.17 A Habitat Regulations Assessment is a legal requirement to test if a plan or project proposal could have a significant impact on the conservation objectives of designated sites such as the SAC. In the Council's work on the Oxford Local Plan 2036, and on the withdrawn Local Plan 2040, the Council has produced Habitat Regulations Assessments and maintained regular engagement with Natural England throughout. This work previously identified that potential impacts on air quality, recreational disturbance, and changes to local hydrology/ water quality are all issues which require assessment through the Habitat Regulations Assessment process.

1.18 As well as continuing its close engagement with Natural England, the Council will be preparing an HRA to support the next stage of the preparation of the Local Plan, and the findings from the HRA will be used to inform the SEA/SA process.

1.5. Health Impact Assessment

1.19 Whilst there are no distinct legislative requirements to do so, the Council is also undertaking a separate Health Impact Assessment process on the Local Plan. This reflects the reality that planning and the built environment can have a significant role to play in shaping healthier environments (or hindering them) for people, which is particularly pertinent to Oxford, being a city characterised by health inequalities across its population.

1.20 This separate form of assessment is a valuable way of helping to identify the key positive and negative health impacts that could arise from proposed policies in the new Local Plan. A scoping study will be undertaken to inform the Regulation 18 consultation, followed by a more detailed assessment of draft policies for Regulation 19.

1.6. Difficulties in compiling the SA/SEA

1.21 The evidence base underpinning the Local Plan will continue to emerge over the coming months as the policies of the plan are developed. It means that, whilst this scoping report has been undertaken using the most up-to-date evidence available, there are potentially some gaps or uncertainties at present. For example:

- As noted above, the Council will be preparing a new Habitat Regulations Assessment to accompany the Local Plan 2042 and any key findings/ implications for the Plan that relate to the SAC will need to be taken into account in due course. This will be published alongside the Regulation 19 consultation.
- An updated Strategic Flood Risk Assessment (SFRA) will be prepared in advance of the Regulation 19 consultation, particularly so that it can inform approach to site allocations. Although the Council is able to make use of the updated national flood risk mapping published in early 2025 in the meantime as well as previous SFRA evidence informing the Local Plan 2042.
- Additional work informing site allocations will be ongoing as these policies are prepared for the Regulation 19 consultation. Any information arising from assessments undertaken of the sites to inform the policies will be factored into the Regulation 19 SA report.

1.7. Structure of this report

1.22 This scoping report has been prepared by Oxford City Council. The aim of this SA scoping stage is to provide background evidence for subsequent stages of assessment. It comprises the 'Stage A' steps shown in Table 1.3, which are the subject of each of the following sections as follows:

- Section 2 – Relating to SA scoping Task A1: Identify other relevant policies, plans and programmes and sustainability objectives: "policy context"
- Section 3 – Relating to SA scoping Task A2: Collect baseline information: "sustainability context"

- Section 4 – Relating to SA scoping Task A3: Identify key sustainability issues and problems
- Section 5 – Relating to SA scoping Task A4: Develop the SA/SEA Framework
- Section 6 – Relating to SA scoping Task A5: Feedback from consultation bodies on the scope of the SA report

1.23 These sections are supported by more detailed analysis which is presented across 14 supporting Background Papers. The Background Papers expand on key information of relevance to Tasks A1, A2 and A3 for the various topics they address. Table 1.5 lists these papers, which can also be accessed via the evidence base online, as well as directly via the hyperlinks, and shows how they relate to the sustainability appraisal objectives which will be discussed at Section 5.

Table 1.5: Background papers and SA objectives

Relevant background paper(s)	**SA objective**	**SEA Themes**
008 Carbon reduction and climate resilient design 012 Transport	1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040	Climatic Factors, Air
008 Carbon reduction and climate resilient design 007 Flood risk, drainage and SUDS 010 Health and Wellbeing	2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	Water, Climatic Factors
006 Green belt 009 Natural Resources	3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	Soil, Material Assets, Biodiversity
001 Housing need, requirement and mix 002 Affordable housing 003 Specialist housing	4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	Material Assets, Population, Human Health
010 Health and Wellbeing	5. To reduce poverty, social exclusion, and health **inequalities**.	Population, Human Health, Material Assets
013 Livable city 014 Infrastructure	6. To provide accessible essential **services and facilities**.	Material Assets, Human Health
005 Green infrastructure and biodiversity	7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	Landscape, Biodiversity, Human Health,
012 Transport 009 Natural Resources	8. To reduce **traffic and associated air pollution** by improving travel choice,	Air, Climatic Factors

Relevant background paper(s)	SA objective	SEA Themes
	shortening journeys and reducing the need to travel by car/ lorry.	
009 Natural resources	9. To achieve **water** quality targets and manage water resources.	Water, Biodiversity
005 Green Infrastructure and biodiversity	10. To conserve and enhance Oxford's **biodiversity**.	Flora, fauna, biodiversity
011 Urban design, placemaking, heritage and archaeology	11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	Cultural Heritage, Landscape
004 Employment and inclusive economy	12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	Population, Material Assets

2. Policy context (Sustainability Appraisal Task A1)

2.1 Oxford's Local Plan 2042 will be influenced by a range of policies, plans, programmes and sustainability objectives. The key policies, plans and programmes that affect the entire plan are discussed below. Additional policies/plans/programmes that affect individual topic areas such as air quality and deprivation are discussed in the 14 Background Papers which support the SA (Table 1.5).

2.1. National context

Levelling Up and Regeneration Act 2023

2.2 This Act came into law in October of 2023 and is set to impose far-reaching changes to the planning and SA/SEA processes which are intended to boost development and speed up the planning process. Many of the changes provided for in the legislation are dependent on subsequent regulations before they would come into effect and detail as to how or when they will come into place specifically is limited. The various changes that the Act lays the groundwork for include:

- Greater digitisation of planning documents
- SA/SEA replaced by "environmental outcomes reports"
- Community Infrastructure Levy replaced by a new national infrastructure levy
- Development of a common framework of National Development Management Policies (including on a national model design code), and commensurate focusing of Local Plans on locally specific matters
- Repeal of the Duty to Cooperate
- Speeding up of the plan-making process
- Removal of the requirement for a rolling five-year supply of housing land where the Local Plan is up to date.

Environment Act 2021

2.3 This Act was signed into law in November 2021 and assigned government a range of new powers to set binding environmental targets for issues such as air quality, water, biodiversity, and waste reduction. From February 2024 (and April 2024 for small sites), it required the majority of new planning applications to deliver at least 10% biodiversity net gain, based on the DEFRA Biodiversity Metric. The Act also set out requirements for the creation of Local Nature Recovery Strategies (LNRSs) to cover the entire country, which would identify important areas for biodiversity as well as opportunity areas for its enhancement. Oxfordshire County Council is currently preparing the LNRS which will cover the county, including the city of Oxford.

Climate Change Act 2008

2.4 This legislation sets statutory targets for reducing national carbon dioxide emissions below 1990 levels at intervals up to 2050. The targets set out in the Act have been amended since to reflect updated goals for climate mitigation, such as most recently setting out a target of net zero emissions by the year 2050 (100% reduction in emissions over 1990 levels). Under the Act, the government is required to set interim reduction targets via carbon budgets, most recently the sixth carbon budget was agreed, whilst the seventh is expected to be set in 2025.

National Planning Policy Framework (NPPF) and associated guidance

2.5 The NPPF sets out the Government's planning policies for England and how these are to be applied and was most recently updated in December of 2024.The NPPF addresses various topics that Local Plans should cover, including planning for housing, employment and protection of the environment (dealing with matters such as climate change, flood risk, biodiversity, high quality design and the historic environment). The various topic-specific background papers that inform this SA provide detailed summaries on the relevant aspects of the NPPF for each topic.

2.6 The NPPF is supported by an online National Planning Practice Guide and the National Design Guide of October 2019 which provides additional guidance on various topics. Again, where relevant, the supporting background papers expand on the relevant detail contained in these resources for each topic.

The Localism Act 2011

2.7 Introduced the right for communities to shape development in their areas through the production of Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders. Currently Oxford has five designated Neighbourhood Forums: Headington, Littlemore, Summertown/St. Margaret's, Wolvercote and Blackbird Leys. The Headington and Summertown/St. Margaret's Neighbourhood Plans were 'made' in July 2017 and April 2019 respectively, whilst the Wolvercote Neighbourhood plan was 'made' in June 2021.

2.2. Regional context

Oxford-Cambridge Growth Corridor and Oxford Growth Commission

2.8 In January 2025, the Chancellor unveiled new plans to deliver the Oxford-Cambridge Growth Corridor that will boost the UK economy by up to £78 billion by 2035, catalysing the growth of UK science and technology. Sir Patrick Vallance has been appointed as the

Oxford-Cambridge Growth Corridor Champion to provide senior leadership to ensure that the Government's ambitions are delivered. The Oxford-Cambridge Growth Corridor will provide a clear strategy for the entire region backed by funding for housing and infrastructure. A new growth commission for Oxford was also announced in January to review how nationally significant growth for the city and the surrounding area can be unlocked and accelerated.

Oxfordshire's Strategic Economic Plan, 2023

2.9 The Strategic Economic Plan (SEP) updates and replaces Oxfordshire's previous economic strategies. Informed by a county-wide conversation, it provides a post-pandemic statement of economic priorities for Oxfordshire. It charts a positive economic future for the county, and sets out a strategy to 2033. The plan includes four key objectives which the SEP will seek to advance, working in concert with other strategic processes across and beyond Oxfordshire, these are to:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation.
- Widen access to current opportunities and equip people and places as jobs change over the next decade.
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050.
- Ensure that Oxfordshire's places are sustainable and inclusive, and that local communities flourish.

Oxfordshire Local Transport and Connectivity Plan (LTCP), 2022

2.10 The LTP, adopted in July 2022, is the statutory Local Transport Plan required under the Transport Act 2000. It sets out Oxfordshire County Council's (as Local Highways Authority) strategy for both digital infrastructure and transport to 2050. It outlines a clear vision to deliver a net-zero Oxfordshire transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents. The LTCP is supported by a number of strategies and plans which are relevant to Oxford—these are detailed further in the Transport Background Paper.

Central Oxfordshire Travel Plan, 2023

2.11 The Central Oxfordshire Travel Plan COTP covers the urban area of Oxford, the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors. The COTP sets out 23 actions to achieve the plan outcomes and support the achievement of the LTCP targets.

2.12 For Oxford these include the expansion of the Zero Emission Zone; strategic traffic filters to reduce traffic levels in Oxford; a workplace parking levy; improving priority and safety of sustainable modes in the city and introduction of a Central Oxfordshire Movement and Place Framework (a joint County-City project which aims to raise the quality of public realm, support a shift to active travel and public transport, improve access to green and blue spaces and make the most of development and regeneration).

East-west Rail link

2.13 In December 2022, England's Economic Heartland published 'connectivity studies' for an East-West rail link from Oxford to Milton Keynes and Cambridge; rail links from Oxford to Northampton, Wellingborough and Peterborough; and other connectivity improvements.

2.14 At the time of writing (January 2025) a consultation on the proposed route and improvements was live. This consultation proposed improvements to Oxford Station and the rail network in order to facilitate the delivery of East West Rail from Cambridge to Oxford.

Oxfordshire Minerals and Waste Core Strategy 2017

2.15 Part 1 (the Core Strategy) was adopted in September 2017 and sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste in Oxfordshire over the period to 2031. A Part 2 that would address site allocations was originally intended to follow, however, a decision was subsequently taken to pursue a new Oxfordshire Minerals and Waste Local Plan (covering the period to 2042) which is expected to come forward in due course and will replace the current Part 1 (and Part 2 which was not pursued).

2.3. Local context

Oxford City Council Our Strategy 2024—28

2.16 The Council's ambition is for Oxford to continue to be a city that is a world-leading centre of research, innovation and science and a thriving place for independent businesses. We will nurture strong, inclusive communities and be a welcoming and supportive place for people from all backgrounds to work, live and visit. As part of the strategy, the Council has identified five priorities:

- Good, affordable homes
- Strong, fair economy
- Thriving communities

- Zero carbon Oxford
- A well-run council

Oxford's Economic Strategy (2022-2032)

2.17 This local strategy seeks to establish a new standard for economic inclusion in the city, underpinned by an impactful and purposeful contribution to the UK and global economy. It also seeks to rapidly address the environmental impacts of economic activity and harness the opportunities of a new net zero carbon economy.

Oxford Climate Emergency declaration and Zero Carbon Action Plan

2.18 In January 2019, Oxford City Council declared a climate emergency. Subsequently a number of organisations across the city came together to agree a net zero carbon target of 2040, ten years in advance of the national net zero target date. This ambitious target will require radical to secure emissions reductions action across all sectors including buildings, transport and waste.

2.19 In March 2021, the various stakeholders in the city who comprise the Zero Carbon Oxford Partnership (ZCOP), and including the Council, published an Action Plan and Roadmap for bringing about a net zero carbon city by 2040, or earlier. The document presents a decarbonisation pathway for the city, aligning with the 2040 goal, and outlines key milestones and actions which need to be taken in different sectors from 2020 to 2050. This includes actions that relate to planning and design of the built environment.

2.20 The partnership is currently in the process of expanding to incorporate the rest of the county and will be known as the Zero Carbon Oxfordshire Partnership.

2.4. Other Key Plans, Programmes and Environmental Objectives

2.21 Originally originating from European Union, there are several pieces of environmental legislation influencing planning policy in the UK that have subsequently been transposed into UK law. These include:

- the Habitats Directive (92/43/EEC) which were transposed into the Conservation of Species and Habitats Regulations 2017 (amended in 2019),
- Air Quality Directive (2008/50/EC) which is transposed into the Air Quality Standards Regulations 2010
- Water Framework Directive (2000/60/EC) which is transposed into the Water Environment Regulations (Water Framework Directive) 2017.

3. Sustainability context (Sustainability Appraisal Task A2)

3.1 In the absence of a new Local Plan 2042, the Local Plan 2036 would continue. It is important to understand the current sustainability context for the city and how this could change in future under this scenario, before we can consider the impacts of taking forward any new Local Plan.

3.1. Current situation and likely future without a new Local Plan

3.2 Table 3.1 therefore presents an analysis, supported by the assessments presented within the supporting Background Papers, which summarises the current situation and the likely situation if the current Local Plan 2036 continued but no new Local Plan 2042 was prepared. It helps to inform the baseline from which to assess the impacts of the new Local Plan 2042 as it is prepared.

Table 3.1: Current situation and likely future without the plan

SA topic	Current situation	Likely future without plan	Summary findings
1. Carbon emissions	-	-	Per capita carbon emissions in Oxford show a steady decline (more than 40% since 2005), principally in line with decarbonisation of the national grid which is expected to continue, though pace is uncertain. Despite overall trend of reductions, emissions are still much above the net zero carbon emissions that Oxford City Council aims to achieve by 2040. National building standards for new development are improving but not to net zero standards and ignore other elements like embodied carbon/energy. Whilst the Local Plan can set standards for carbon reduction in new buildings (and the existing Plan does this), it has limited powers in other respects, for instance, driving the retro-fit of existing homes (e.g. via energy efficiency measures). Greater energy efficiency and renewable energy requirements can also conflict with other priorities, such as providing affordable homes owing to viability issues. Regardless of new development, there will be an ongoing need for significant retro-fitting of existing development, and behaviour change as well as enabling the shift away from reliance on fossil fuels at various scales. The city's Net Zero Carbon Action Plan identifies the key steps/milestones that need to

SA topic	Current situation	Likely future without plan	Summary findings
			be met to secure net zero by 2040 and the Zero Carbon Oxford Partnership aims to drive this through various initiatives (Local Plan is only one part of the response).
2. Resilience to climate change	**--**	**-**	A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. This risk is likely to increase with climate change. A flood alleviation scheme (OFAS) is proposed for the west side of Oxford, although this will not mitigate flood risk everywhere. Given constraints on development in Oxford, there could be increased pressure to locate development in areas of higher flood risk or upon areas of existing flood storage. Local Plan 2036 has strong policies on flood risk, as does NPPF, but residual risk can remain an issue for new development in at risk areas. Oxfordshire County Council has undertaken a Climate Risk assessment for Oxfordshire: alongside flooding it identifies overheating as an increasing risk, particularly if future global climate change targets are missed. Updated national building standards have incorporated limited requirements to consider overheating in new buildings but resilience building to this risk, as well as flooding from various sources, will need to be achieved through a variety of responses: Local Plan policies are one tool in the longer term, but other actions will also be needed.
3. Efficient use of land	**0**	**0**	Increased housing pressure means that there will be even more pressure on undeveloped land including green spaces which are important for sustainable communities and biodiversity. Without a new plan, housing may be developed in less sustainable locations. Without policies to prioritise delivery of new homes, many sites are far more likely to come forward for commercial uses (in less suitable locations). Development density and protection of undeveloped land have been good to date. Protection of undeveloped land should have supported the protection of soil in parts of the city, although it is

SA topic	Current situation	Likely future without plan	Summary findings
			likely that soil quality in other areas could be impacted by urbanisation. The higher costs associated with dealing with any remaining contaminated sites could affect viability and increase pressure to develop greenfield sites. Oxford has a number of locations with peat-rich soil deposits which are particularly valuable as important storage for carbon (carbon sinks), managing/storing water, and also for retaining archaeological deposits. Historic development has likely removed some wider deposits, and there are also potentially unmapped/unknown deposits still present in areas. Current Plan protects some of the key areas of known deposits (as protected open space), but there is potential for additional losses of unrecorded deposits to development in future without additional mitigation.
4. Local housing needs Need and supply	--	--	Previous housing need assessments have identified that there is not enough capacity within Oxford to meet all of the housing need. Using the government's proposed standard method (published December 2024) annual housing need is set at 1,087 per annum (21,740 for the 20 year plan period). This is more than the identified capacity in the city, which is likely to remain the case to 2042. Some of Oxford's housing needs may therefore need to be met outside the city. Without additional large-scale development sites, the proportion of homes delivered through small infill sites is likely to increase, and could increase pressure on the existing infrastructure owing to the incremental nature of these proposals, without them delivering new on-site infrastructure. There is also limited opportunity to deliver affordable housing from these smaller developments.
Affordable housing	--	--	House prices in Oxford are already very high, and future prices are likely to continue to rise more quickly than average salaries. Housing to rent on the open market is also unaffordable to a significant proportion of people. So delivering affordable housing is also a priority for the Plan, particularly for those in greatest levels of need (social rent homes).

SA topic	Current situation	Likely future without plan	Summary findings
			The annual provision of affordable housing has been increasing as a result of new development and the city council's own house building and delivery programme. However, national policy provides challenges, for example reducing the number of sites from which contributions can be sought towards affordable housing to those of 10 or more units, and allowing affordable housing models which are still not affordable in the Oxford context.
Students and student accommodation	**0**	**0**	The existing Local Plan sets a threshold on student numbers living outside of university owned or managed accommodation to reduce the loss of family homes, and to manage competition for residential sites.
5. Inequalities and health Inequality	**-**	--	Oxford's overall prosperity masks localized areas of deprivation. There are sharp inequalities across the city in terms of opportunities, wellbeing and health. These are being exacerbated by the cost of living crisis. Continued action needs to be taken to address these inequalities to enable all parts of Oxford's communities to experience a good quality of life. For example, the health of Oxford's residents is generally good, but there is great variation: for instance, men in wealthier parts of the city live more than 13 years longer than men in more deprived parts of the city. This disparity needs to be reduced. Inequalities are likely to exacerbate the future risks to health and wellbeing caused by climate change, particularly overheating and flooding. Oxford is already at higher risk to overheating because of the level of urbanisation compared with other parts of the county and this will continue in future according to 2050 projections without appropriate resilience measures.

SA topic	Current situation	Likely future without plan	Summary findings
General health	+	+	Despite more localised inequalities, Oxford residents' general health is good and the higher-than-average levels of activity and healthy weight need to be maintained and increased. The Local Plan can help to address wellbeing and mental health by improving housing quality, access to open spaces and building communities. There is some national research that indicates national picture of population health is deteriorating, although consequences for Oxford's population specifically are unclear. See also analysis against 'inequality' above.
Health and housing	-	--	Beyond the Local Plan, there are plans for improving the existing areas of regeneration in the city, such as Blackbird Leys and West End. Physical regeneration interventions, however, need to be supported with a package of social, economic and environmental measures to ensure the maximum wider benefits are delivered. See also analysis against 'inequality' above.
6. **Services, facilities and infrastructure** Community facilities	0	-	Availability of services and facilities plays a key role in quality of life and Oxford's compact nature means there are many areas which benefit from good access to daily needs, however this is not universal across city. The pandemic highlighted the value people put on facilities in their local areas. With an increase in population, it will become even more important to protect and enhance these facilities, and ensure that they are easy to access by walking, cycling and public transport. Economic shocks like the pandemic and other factors including rising costs of energy and living in general continue to put pressure on services, community and cultural facilities however. Changes to use class order such as the introduction of use class E make it harder to protect particular services/facilities through local planning policy.
'Grey' infrastructure	-	-	There are some known utilities issues in the city, including capacity concerns with the wastewater treatment plant and potential challenges around energy supply as the city moves towards net zero carbon. Transport is covered under 8. (Traffic and air pollution). Water is covered further under 9. (Water).

SA topic	Current situation	Likely future without plan	Summary findings
			The improvements needed to address many of the grey infrastructure issues are somewhat outside of the Local Plan's control. They rely upon investment and infrastructure upgrades by others with primary responsibility for the infrastructure, such as the utilities providers, with the Council acting in a enabling/supporting role helping to ensure plans are appropriate for scales of growth expected.
Digital infrastructure	+	++	The pandemic has increased and highlighted people's reliance on the Internet. Broadband coverage in Oxford is generally good and increasing.
7. Green infrastructure and leisure	++	+	Oxford has a wide range of green spaces which are generally of good quality although unevenly distributed. However, as Oxford's population increases, there will be more demand for outdoor sports and recreation, and increasing pressure on Oxford's green spaces. Limited development opportunities are likely to maintain an ongoing demand for infill development making use of garden spaces and reducing local green infrastructure features. It is unlikely that new large public open spaces will be created with or without a Plan, although smaller spaces could be, and existing open spaces can be enhanced. In addition, any green space (unless it can be show to be surplus) lost to development has to be replaced elsewhere in the city. Green spaces will need to respond to climate change, providing long term flood protection and adaptable habitats, as well as other to impacts from surrounding urbanisation like pollution (e.g. water, air).
8. Traffic and air pollution Air quality	-	+	All of Oxford is an Air Quality Management Area for NO2, and there are air quality 'hot spots' at many major road junctions. Most of the city's air pollution comes from the transport sector according to the most recent source apportionment studies. Since the launch of the city's Air Quality Action Plan, good progress in terms of reductions in NO2 levels have been recorded although there is still work to be done. The Oxfordshire authorities are focusing on active travel, improving walking and cycling infrastructure and public transport, and restricting cars e.g. through

SA topic	Current situation	Likely future without plan	Summary findings
			low traffic neighbourhoods, traffic filters, work place parking levy, extending the area of the zero emission zones and supporting the introduction of non ICE bus fleets. These actions should potentially benefit air quality as well as congestion. The national phasing out of petrol/diesel cars and shift to electric vehicles will help to improve air quality.
Traffic levels and congestion	--	-	Congestion on Oxford's main roads is endemic even though Oxford has very good bus services and higher levels of cycling and public transport use than many comparable cities. With the population and job growth envisaged for Oxfordshire, a continuation of existing levels of car use would threaten to over-burden the transport network. Various measures are planned or in progress to tackle combined issues of congestion and poor air quality, see also the analysis above against 'air quality'.
9. Water Water resources	-	--	Oxford is in an area of serious water stress and the current Local Plan sets water use limits on new development in line with Building regs for this reason. Water resources are currently adequate but may not be by 2042 due to challenges like climate change and increased demand for water from a growing population. Beyond any Local Plan, Thames Water have various interventions planned as part of a strategy covering the next 50 years to address water supply deficits through their Water Resources Management Plan (2024), including proposing a large new reservoir at Abingdon. There are various ecological sites in the city which are sensitive to changes in hydrology (water flows and water quality). The Local Plan 2036 sets policies which ensure development considers and addresses potential impacts and these would remain relevant in the absence of a new Plan.
Water quality	-	?	Water quality in the Thames catchment is moderate or poor in certain watercourses. Some of the causes of this are outside of Local Plan influence (e.g. agricultural practices and invasive species). Other causes have a more direct relationship to development, for instance, run-off from increased

SA topic	Current situation	Likely future without plan	Summary findings
			development could worsen this. The extant Local Plan cover city to 2036 and includes policies that help address water quality such as SuDS to address run off. Addressing existing capacity problems at the wastewater treatment plant which serves housing in the city is considered to be the key intervention needed to support improvements in water quality. Recently, the Council, EA and Thames Water have come to agreement on an upgrade scheme that should address capacity concerns for the Sewage Treatment Works, and as this come online in future, the situation is likely to improve for water quality in the city.
10. Biodiversity	**-**	**0**	Biodiversity is plummeting worldwide including in Oxfordshire. The Environment Act requires at least 10% net gain in biodiversity in new development nationally (irrespective of the Local Plan) and superseding existing biodiversity net gain policy in Local Plan 2036. The County are preparing a Local Nature Recovery Strategy which identifies a range of enhancement opportunities across the city but these are reliant on willing landowners/investment. Wider challenges such as climate change, invasive species and pollution (e.g. air, water) are likely to continue to put pressure on biodiversity more broadly.
Nature conservation areas	**+**	**0**	Nature conservation areas such as Oxford Meadows SAC are currently relatively well protected, and policies in the extant Plan protect all green spaces identified as being of high biodiversity value at a local, regional or national level. This would remain the case to 2036, after which national policy would apply. Designated sites like the SAC and SSSIs benefit from national protection, however the absence of a new local plan after 2036 could reduce protection for local sites (although many may benefit from other tangential protections e.g. Green belt).
11. Urban design and historic environment	**++**	**+**	Oxford has a high-quality landscape and historic environment. Various national protections for designated historic assets (e.g. listed buildings) and non-designated local assets will continue under current Local Plan. High levels of development and tourism continue to put a strain on natural and

SA topic	Current situation	Likely future without plan	Summary findings
			historic sites and Oxford's landscape and townscape.
12. Employment and economy Employment	++	++	Oxford has a very strong economy, with high employment, low unemployment and high Gross Value Added. Oxford is a 'fast growing', 'innovative' city that delivers significant economic growth. There is strong demand for research and development uses, which needs to be supported as a key sector of Oxford's economy and a driver of the national economy. Oxford's economy has remained resilient in the face of recession and wider national economic challenges.
Unemployment	++	++	Future employment growth in Oxford is likely to be in high-skill sectors: without appropriate skills and training, these jobs will not be accessible to local people. Also, see analysis against 'employment' above.
Education, skills and employability/ training	+	?	Oxford Economic Strategy includes a vision to deliver a more 'inclusive economy.' The city includes 9 areas amongst the most deprived in UK. Oxford's population overall is highly skilled, but there are parts of the city (8 areas) where the local population is classified within the 10% most deprived for educational skills and training in the country. State schools across Oxford, and particularly in deprived areas, generally under-perform compared to regional and national averages. Skills mismatches increase in-commuting, exacerbating congestion problems. Greater opportunities for start-ups and SMEs are important for Oxford's economy to fully function, and diverse job opportunities are needed, otherwise an 'inclusive economy' will not be realised.
Regeneration and economic revival	0	0	It is unlikely that significant new employment sites will be identified in Oxford: the focus at present is on the redevelopment, intensification and renewal of existing sites. Ensuring the right balance of employment and housing growth supported by infrastructure is fundamental to ensuring sustainable growth in Oxford. It is important to ensure that the capacity for housing in the city is delivered including on employment sites. Oxford's housing shortage and

SA topic	Current situation	Likely future without plan	Summary findings
			its affordability cause problems for businesses and key sectors in both recruiting and retaining staff.

3.3 Even without the Local Plan 2042, the analysis in Table 3.1 indicates that there will be some improvements in performance against certain sustainability indicators for the city in future due to factors outside of the Local Plan's direct influence such as national legislation and shifting technologies on the market. For example, the Biodiversity Net Gain requirements of the Environment Act, alongside the opportunities identification of the Local Nature Recovery Strategy may help to support new spaces for flora and fauna. Tightened building regulations bringing about improvements in energy efficiency and the ongoing decarbonisation of grid energy will go some way to reducing carbon emissions. Meanwhile, the policies of the Local Plan 2036 will remain in effect, securing various sustainability benefits from new development coming forward in the intervening period.

3.4 There will likely also be reductions in the performance of the city against some sustainability indicators without a new Local Plan, such as increasing pressures on land including green spaces or areas of flood storage, as well as pressure from new development on the setting of existing assets like historic buildings which contribute to the character of the city. The impacts of climate change are a factor which will have various effects such as increased stress on water resources, and increasing health risks from hotter summers. Whilst the city's economy is buoyant and expected to continue to generate employment opportunities, there is a risk that those with less skills or experience could be left behind where these opportunities are skewed towards higher skilled sectors; meanwhile, uncertainty and cost of living challenges could impact upon provision of services and other facilities for local residents.

3.5 The Oxford Local Plan 2036 preceded various societal and national policy changes of recent years such as Brexit and Covid-19, the Environment Bill, and the changes to permitted development which now allow, for instance, offices to be turned into housing. It also preceded the creation of the new Oxford Growth Commission as part of the government's new plans for the Oxford-Cambridge Growth Corridor; the city's declaration of a climate emergency and subsequent signing of a net zero carbon target of 2040. Meanwhile, there are ongoing challenges such as the continued housing crisis, the changing picture of retail, and impacts of pollution on the environment from various

activities which have not been resolved. A new Local Plan offers the opportunity to respond to these changes and ongoing challenges.

3.2. Existing problems at areas of particular environmental importance

3.6 Also of relevance to the current sustainability context of the city, the SEA process requires an analysis of existing problems at areas of particular environmental importance, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). SPAs and SACs are internationally important nature conservation sites designated for, respectively, birds and habitats/species. This section also discusses the city's Sites of Special Scientific Importance which are nationally designated areas of importance in the city.

3.7 Whilst there are no SPAs in or near Oxford, there are three SACs within 20km of Oxford:

Oxford Meadows SAC - is a 267ha site, part of which lies within the city boundary. It is designated because of its lowland hay meadow and creeping marshwort *Apium repens*. In December 2015, the last year of analysis of Oxford Meadows, it had excellent overall ('global') value for its hay meadow and creeping marshwort. However, it is highly threatened by human induced changes in hydraulic conditions, pollution to surface water and invasive non-native species. Previous HRA work and discussions with Natural England have also flagged concerns about air quality impacts arising from traffic emissions and recreational disturbance.

Cothill Fen SAC - is a 43ha site located 7km from the city boundary. It is designated for its lowland valley mire, which contains one of the largest surviving examples of alkaline fen vegetation in central England. In December 2015, the last year of analysis of Cothill Fen, the alkaline fens were of good overall ('global') value, and the alluvial forests were of significant overall ('global') value. The SAC is highly threatened by pollution to groundwater and human-induced change in hydraulic conditions.

Little Wittenham SAC - is a 69ha site located 19km from the city boundary. It is designated because it contains one of the best-studied great crested newt sites in the UK. In December 2015, the last year of analysis of Little Wittenham, the great crested newt population was assessed as being of good overall ('global') value, but it is highly threatened by non-native invasive species.

3.8 Additionally, Oxford also has a number of Sites of Special Scientific Importance (SSSIs) as is shown at Table 3.2 and Figure 3.1. Of those SSSIs within, or partially within

the city, they are of varying condition, with the majority being in favourable condition, but two in unfavourable condition and three in partial unfavourable condition. The information on SSSI condition is normally 5-10 years old, so their condition may have changed since it was assessed. The table includes links to the summary information for each site on Natural England's Designated Sites viewer website.

Figure 3.1: Locations of Sites of Special Scientific Interest (SSSIs) within and around Oxford and their condition, (source: DEFRA MAGIC website accessed 13.01.25)

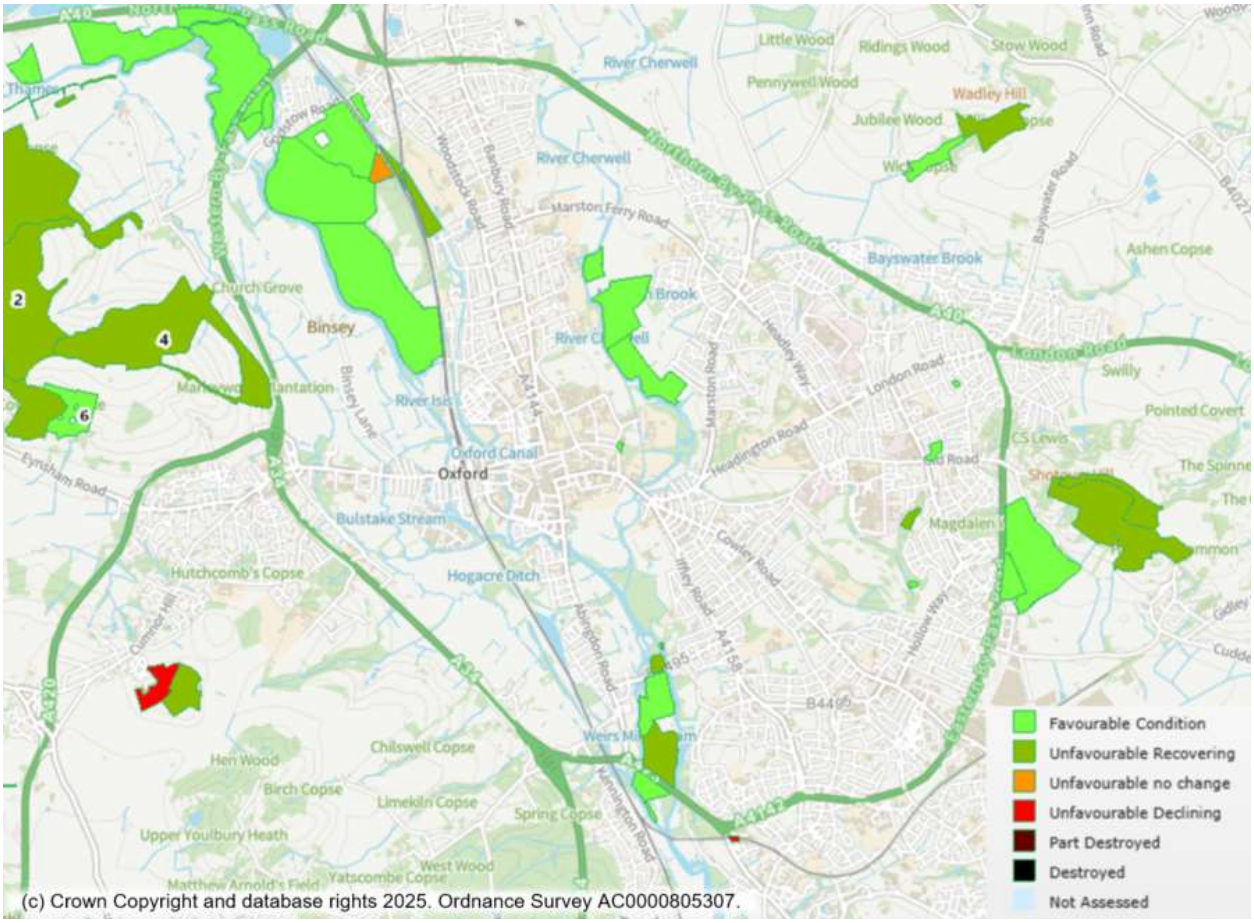

Table 3.2: Additional details relating to Sites of Special Scientific Interest (SSSIs) within Oxford or nearby

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
Brasenose Wood and Shotover Hill	109.24ha	Partially	42.67% Favourable; 57.33% Unfavourable - recovering
Cassington Meadows	6.89ha	Nearby/outside city	100.00% Favourable

Site of Special Scientific Interest (SSSI)	Size in hectares	Within city?	Unit(s) condition
		(also comprises part of Oxford Meadows SAC)	
Hook Meadow and the Trap Grounds	11.85ha	Yes	67.56% Unfavourable - recovering; 32.44% Unfavourable – no change
Iffley Meadows	36.14ha	Partially	53.80% Favourable; 46.20% Unfavourable - recovering
Littlemore Railway Cutting	0.50ha	Yes	100.00% Unfavourable declining
Lye Valley	2.34ha	Yes	22.96% Favourable; 77.04% Unfavourable - recovering
Magdalen Grove	0.43ha	Yes	100.00% Favourable
Magdalen Quarry	0.34ha	Yes	100.00% Favourable
New Marston Meadows	44.70ha	Yes	100.00% Favourable
Pixey and Yarnton Meads	86.38ha	Partially *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Rock Edge	1.72ha	Yes	100.00% Favourable
Sidling's Copse and College Pond	21.71ha	Nearby/outside city	33.19% Favourable; 66.81% Unfavourable - recovering
Wolvercote Meadows	7.06ha	Yes *(also comprises part of Oxford Meadows SAC)*	100.00% Favourable
Wytham Ditches and Flushes	2.74ha	Nearby/outside city	100.00% Unfavourable - recovering
Wytham Woods	423.83ha	Nearby/outside city	3.50% Favourable; 96.50% Unfavourable - recovering

3.9 As can be seen above, the areas of particular environmental importance in and around the city are in varying condition and subject to various ongoing threats. Some of these threats can be more directly influenced by the Local Plan and the planning system than others.

4. Identify key sustainability issues and problems (Sustainability Appraisal Task A3)

4.1 The policy context of Task A1 and sustainability context of Task A2, as was presented in the previous sections and accompanying Background Papers, identified a range of issues and problems of relevance to the development of the Oxford Local Plan 2042. This section now takes forward and identifies the key sustainability issues and problems that the Council will need to be aware of and respond to where possible in line with Task A3 of the SA process. It is an important step in helping to narrow down the focus of the Local Plan 2042 as well as the accompanying SA/SEA process informing the Plan's development.

4.2 Table 4.1 draws together the key issues and problems which were highlighted in the previous sections and the 14 background papers that support the SA.

Table 4.1: Key sustainability issues and problems for the Oxford Local Plan 2042

SA objective	Sustainability issues and problems
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Oxford is still very far away from achieving its 2040 target of net zero emissions and Local Plan cannot deliver it alone. • Retrofitting existing developments will be a significant challenge but critical to helping meet local and national net zero targets. • New development must not further contribute to climate change or the existing retro-fit burden in the city. • Policy needs to target energy efficiency and embed the energy hierarchy into the design of new buildings (fabric first, reducing energy use, mitigating remaining emissions). • Embodied carbon is an ongoing challenge to be addressed as part of the construction process although it is a complex and multi-faceted issue. • There is potential for supporting more renewable energy generation across city through greater uptake of micro-renewables in new development and on existing rooftops, although capacity elsewhere (e.g. for larger installations) is uncertain due to the many constraints on land.
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-	• A significant area covering properties and other land uses in Oxford is at risk from river flooding, as well as other sources of flooding such as groundwater, surface water and sewer flooding. The Oxford Flood Alleviation Scheme

SA objective	Sustainability issues and problems
being, the economy and the environment.	is expected to reduce flood risk for a number of existing properties and infrastructure. • There will be residual risks of flooding after applying the sequential approach to locating development and incorporating defence measures. • Overheating is a prominent and increasing risk in the city, particularly more urban areas. Overheating risk is exacerbated in areas with reduced green infrastructure as well as higher levels of deprivation or poor quality buildings. • The Local Plan 2042 will need to take long term flood risk and overheating into account, including the impacts of climate change and how this could change the pattern and severity of these risks in the city. • New development should not exacerbate flood risk or overheating, such as through excessive use of hard surfaces increasing surface run off into sewers, or exacerbating the urban heat island effect. • There are links between flooding/overheating and human health (physical and mental), particularly in areas of the city that are most deprived or highly urbanised/lacking in green infrastructure.
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• The plan must aim to use suitable brownfield sites and other underutilised land as a preferred option for development. • An increase in minimum housing density should be considered where a sufficient level of infrastructure is present. • Prioritising brownfield land for development may reduce opportunities to repurpose the sites for public amenity or as green infrastructure with a focus on ecological/biodiversity functions. • The cost of developing contaminated sites is likely to be higher than developing elsewhere. In turn, these higher costs increase pressure to develop greenfield sites. • Soils are at risk from pollution arising from new development as well as degradation from development/construction processes, this includes limited carbon-rich peat reserves that have already been degraded by historic development in the city. • The City Council should only release land from the Green Belt or alter the boundary where exceptional circumstances are fully evidenced and justified. • The plan should consider a more comprehensive approach to Oxford's Green Belt and whether any part of

SA objective	Sustainability issues and problems
	it is now designated as 'grey belt' as defined in the updated NPPF (December 2024).
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing costs in Oxford are very high, land available for housing is very limited, and affordable housing has historically been difficult to provide. • Oxford has limited capacity to deliver new homes within its boundary and has been unable to meet housing need in full without support from neighbouring authorities. • A continued reliance on smaller sites is likely to increase pressure on existing infrastructure. • The type of affordable housing delivered in Oxford is likely to be impacted upon by changes made through national policy, i.e., requirements for First Homes. • The Plan should assess and respond to the need for student housing: The links between provision of student housing and other types of housing should be considered when developing policies. • The potential implications of student housing in different locations, for students, neighbourhoods and in terms of delivering sufficient housing of the right type should be considered.
5. To reduce poverty, social exclusion, and health **inequalities**.	• Oxford has high levels of health inequalities across the city. • Covid and the ongoing cost of living crisis have exacerbated inequalities and harmed health for many. • Oxford's higher-than-average levels of activity and lower-than-average levels of obesity need to be maintained and improved. • The Local Plan can help to improve mental health and wellbeing through, for instance, improving quality of housing, improving access to open spaces, and focusing on building communities, particularly learning from the coronavirus pandemic. • Climate resilience measures will be essential for reducing impacts on health and wellbeing as the city moves towards a net zero future, particularly for the most vulnerable communities.
6. To provide accessible essential **services and facilities**.	• Economic shocks impacting cost of living and generating higher energy prices is likely putting strain on community and cultural facilities. Protection of facilities may become more difficult, given changes to government policy on permitted development. • With high pressure for housing, it will be important to make a case for the importance of the facilities that support this housing. The plan will need to meet the

SA objective	Sustainability issues and problems
	infrastructure needs of additional development in the city over the Local Plan period. • New infrastructure must address the climate emergency (low carbon, climate resilient). Natural solutions will be important in ensuring the resilience of infrastructure. • Infrastructure needs to help people to live healthy, active lives (e.g. walking/cycling, GP surgeries). • The city generally and its infrastructure should be adaptable to future changes in technology. • The retail and service sector plays a crucial role in Oxford's economy, providing job and leisure opportunities to local people. The city must offer a diverse range of retail uses and services, ideally in accessible locations.
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• Unequal access to, and distribution of, green infrastructure across the city exacerbate wider health inequalities. There are priority areas which would benefit particularly from increased greening. • Infill development within the city, particularly on garden land, can reduce green infrastructure coverage which would otherwise provide natural benefits like water storage and habitat for wildlife. • Increased recreational pressure arising from population growth and visitors to the city puts pressure on open spaces including playing pitches which are important for health and wellbeing of residents, particularly those without gardens. • Climate change and impacts from development such as on water quality (e.g. run-off from roads etc.) puts pressure on existing green infrastructure and biodiversity. • Very limited opportunities to create large areas of new public open space.
8. To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry.	• Although Oxford is known for its high levels of walking, cycling and public transport use, Oxford's roads are still congested, with high levels of commuting by car. • All of Oxford is an Air Quality Management Area because of NOx, which mostly comes from vehicles. Tackling emissions from domestic and nondomestic sources is likely to improve air quality. • Past transport policy has focused on carrots: improving facilities for walking, cycling and public transport. However current policy is also to discourage car use, for instance through restricted parking, zero emission zones, and reallocation of some road space to sustainable forms of transport.

SA objective	Sustainability issues and problems
	• Restrictions in car use in the city must be supported via a strong and affordable public transport infrastructure network. • Improvements in electric transport provision and the restriction of cars in the city centre will help to achieve a zero carbon Oxford. The uptake of low/zero emission vehicles should be encouraged, in particular buses and taxis which will continue to need to access the city centre. • Improvements to cycling and walking infrastructure must be inclusive and the benefits shared by all of Oxford's residents. • Improved public transport connections between the city and surrounding areas will improve the integration of settlements throughout Oxfordshire
9. To achieve **water** quality targets and manage water resources.	• Oxford is already in an area of serious water stress. Climate change, particularly incidences of hotter, drier summers may exacerbate water supply issues and create increased water shortages. • Increased demand for water is likely to put more pressure on water resources. Additional water efficiency measures will need to be investigated through the plan-making process. • There are known water quality issues in local watercourses arising from a variety of sources. Nutrients from wastewater could further impact these local water bodies. Pollutants can also arise from other sources, like road runoff. This may have knock on implications in terms of the Water Environment Regulations, and the city's ambitions for bathing water status for parts of the River Thames. • Capacity upgrades are needed for the wastewater treatment works that services the city, Thames Water are working on plans to undertake these works but these plans are still emerging and will take time to complete. • There are various ecological sites in the city which are sensitive to changes in underlying hydrology that supports these areas (both changes in water flows and water quality), which new development may need to consider depending on location.
10. To conserve and enhance Oxford's **biodiversity**.	• The Oxford Meadows SAC is already negatively affected by air pollution and is threatened by recreational pressure, changes to the hydrological regime as well as invasive species. • Two SSSIs out of the twelve in the city are in unfavourable condition and three are partly in unfavourable condition.

SA objective	Sustainability issues and problems
	• Development pressure on, or near to protected sites could result in direct loss of habitat or species, fragmentation of ecological networks, as well as indirect impacts e.g. from noise, light, air pollution. • Climate change is likely to impact habitats and species distribution. • Off-site areas for biodiversity net gain stemming from development will probably be needed in response to the Environment Act. • The County are preparing a Local Nature Recovery Strategy, a key requirement arising from the Environment Act. This document should identify opportunity areas for biodiversity enhancement in the city and wider county (including offsite BNG), although there may be other opportunity areas. The LNRS does not assign additional protection nor mandate enhancements itself.
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Oxford is a historic city, characterised by an abundance of designated and non-designated heritage assets which form an important part of the city's character. • Potential heritage impacts of new development proposed in the plan should be considered and assessed where necessary, both in terms of any direct physical impacts and impacts on setting. • Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character. • Local design guidance informed by local communities should reflect the special characteristics and needs of different parts of the city. • Green spaces and features should be woven into the urban fabric. • Mitigation of, and adaptation to, climate change will require good design. This is a particular challenge for heritage assets, which will require a Whole Building Approach to any retro-fit measures. • Good design should focus on people within the spaces, how they move, interact and socialise; and should engender feelings of safety and security.
12. To achieve sustainable inclusive **economic growth**, including the development and	• Employment in the city remains high and likely to continue growing;

SA objective	Sustainability issues and problems
expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• The city's economic potential is being constrained by a lack of availability of suitable and appropriate housing. Some employers have reported difficulties attracting and retaining staff because of these issues; • It is unlikely that new strategic sites will be identified for employment development. As such, it will be important that sufficient employment floorspace is available throughout the city's network of existing employment sites. This is to help ensure that Oxford can meet any identified employment land needs; • The focus for new employment development in Oxford is likely to continue with an approach of redevelopment (including modernisation and intensification) and renewal of existing sites; • A strategy that enables appropriate levels of employment growth while encouraging the delivery of much-needed housing is key to ensuring that Oxford grows in a sustainable manner; • Employment growth in Oxford is most likely to continue in the key sectors of healthcare and STEM, especially those involving R&D; • Without appropriate skills & training, jobs in Oxford's key sectors are unlikely to be accessible to local people; • State schools across Oxford, and particularly in deprived areas of the city, generally under-perform compared to regional and national averages; • Some changes were accelerated by the pandemic. For instance, due to the increase in on-line retail, the make-up of the city and district centres are seeing a shift in their make-up. Once dominated by retail, other uses, such as employment and educational uses are bringing footfall and vitality and these important centres. Examples of non-retail opportunities that are emerging in city centres include co-working spaces, R&D and more; • Ensuring expanded and robust digital infrastructure is available in as many settings as possible to align with the expectations and flexibility of hybrid working. This will enable people to have the opportunity to work or study in numerous locations across the city; • Small scale brownfield development across the city is more likely to put pressure on existing school places and will not in itself provide new school sites.

4.3 Table 4.1 has brought together the key issues and problems identified across the SA scoping work and the accompanying Background Papers. It highlights a range of

challenges facing the city in relation to different aspects of sustainability which the new Local Plan will need to try to respond to. The analysis not only helps to frame the vision and objectives for the new Local Plan but also helps in informing the assessment framework that should be utilised to appraise the emerging policy framework and its impacts on the city and wider environment.

5. Develop the SA framework (Sustainability Appraisal Task A4)

5.1 An SA/SEA Framework provides a method by which the sustainability effects of a plan can be identified, described, analysed and compared. The analysis undertaken in the previous sections of this report, and fulfilling tasks A1 to A3 of the SA process stage A, helps to formulate the specific SA/SEA Framework that should be used for the Local Plan 2042, ensuring that it is tailored to the local context of Oxford. The development of the Framework is discussed in this section.

5.2 Development of the Local Plan 2042 will involve two types of decisions:

- on the plan objectives, alternatives and policies (general directions for the plan); and
- on sites (specific locations for development).

5.3 Assessing the impacts of the plan objectives, alternatives and policies involves a more general analysis against an overall framework of SA objectives. Assessing the impacts of sites involves analysing the site's location and future ability to support sustainable development. As such, two different appraisal frameworks have been used, which are discussed in turn in the following sub-sections.

5.1. The SA framework for plan objectives, alternatives and policies

5.4 The SA Framework of Table 5.1 consists of SA objectives and issues and is what will be used to assess the impacts of the plan objectives, alternatives and policies. The SA objectives provide a method by which to test whether the Local Plan will yield the best possible outcomes in terms of sustainability—its environmental, social and economic effects. The SA objectives therefore cover a full cross-section of sustainability issues. The objectives and the issues covered have been informed by the analysis undertaken in the previous tasks (particularly the key issues/problems identified under Task A3/Section 4).

Table 5.1: SA/SEA framework for plan objectives, alternatives and policies

SA Objective	Issues covered	SEA Themes
1. To achieve the city's ambition to reach net zero **carbon emissions** by 2040.	• Building standards and energy efficiency • Renewable energy generation • Active travel and public transport • Waste reduction	Climatic Factors, Air

SA Objective	Issues covered	SEA Themes
	• Sustainable construction practices including addressing embodied carbon	
2. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.	• Flooding • Resilient and adaptable building design and layout • Overheating	Water, Climatic Factors
3. To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.	• Building densities and layout • Greenfield versus Brownfield land • Green belt and grey belt? • General biodiversity and designated sites • Soils including peat reserves. • Land contamination	Soil, Material Assets, Biodiversity
4. To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.	• Housing numbers • Housing size/mix • Affordable housing • Specialist accommodation (e.g. care homes, gypsies/travelers) • Student accommodation	Material Assets, Population, Human Health
5. To reduce poverty, social exclusion, and health **inequalities**.	• Regeneration • Geographical spread of new development • Accessibility for areas of deprivation • Availability of services/infrastructure in areas of deprivation • Improving health and wellbeing and reducing health inequalities	Population, Human Health, Material Assets
6. To provide accessible essential **services and facilities**.	• Daily needs met within a short walk/cycle ride • Thriving city/local centres • Retail/shops provision • Community facilities, health care/GP, schools • Facilities for children/young people inc. play areas • 'Grey' infrastructure e.g. wastewater treatment, transport, energy.	Material Assets, Human Health
7. To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.	• A network of green and blue infrastructure • Leisure facilities • Playing fields and public open space • Distribution/location as well as quantity of typologies of green infrastructure (inc the above)	Landscape, Biodiversity, Human Health,
8. To reduce **traffic and associated air pollution** by improving travel	• Promoting active travel – walking/cycling etc. • Reducing reliance on the private car	Air, Climatic Factors

SA Objective	Issues covered	SEA Themes
choice, shortening journeys and reducing the need to travel by car/ lorry.	• Public transport incl. Train station and branch line • Commuting and housing/jobs balance • Parking • Electric vehicle charging points, zero emission zones • Addressing poor air quality and links to transport	
9. To achieve **water** quality targets and manage water resources.	• Water use and water resources • Improving water quality and avoiding further deterioration • SUDS, buffers on streams etc.	Water, Biodiversity
10. To conserve and enhance Oxford's **biodiversity**.	• Habitat Regulations Assessment inc. Air quality and recreational disturbance • SAC, SSSIs, local nature designations • Biodiversity more generally (e.g. wildlife friendly measures and habitat features) • Biodiversity Net Gain (BNG)	Flora, fauna, biodiversity
11. To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.	• Designated assets incl. Listed Buildings, scheduled monuments, Registered Parks & Gardens and Conservation areas • Non-designated assets, particularly those of local importance • Archaeology • Setting/curtilage • High quality urban design • View cones • High buildings	Cultural Heritage, Landscape
12. To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.	• Jobs incl. Knowledge-based jobs • Visitor economy • Locations for start-up ventures • Jobs for local unskilled/underskilled residents, apprenticeships • Keeping high streets alive amist changing shopping habits, changes to permitted development etc. • Cultural provision and tourism	Population, Material Assets

5.5 The SEA process requires the Environmental Report to include information on the likely significant effects on a specified list of environmental factors. Table 5.2 shows how the SA Objectives relate to these factors.

Table 5.2: Links between SEA Directive issues and SA objectives

SEA Directive issue	SA objectives
Biodiversity	3, 7, 9, 10
Population	4, 5, 12
Human health	4, 5, 6, 7
Flora	10
Fauna	10
Soil	3,
Water	2, 9
Air	1, 8
Climatic factors	1, 2, 8,
Material assets	3, 4, 5, 6, 12
Cultural heritage (including architectural and archaeological heritage)	11
Landscape	7, 11

5.2. The SA framework for sites

5.6 More site-specific appraisal criteria will be used to assess the impact of proposed development sites. Many of these relate to the location of the site, which is a key determinant of its sustainability: how easily would users of the site be able to access a range of facilities (more sustainable), and how close is the site to sensitive environmental areas (less sustainable)?

5.7 The same colour/symbol coding will be used as for policy appraisal (see Table 1.4), however there may be instances where an additional colour/code will be used to score a particular criterion where the ultimate score will depend upon implementation of the particular design of a proposed scheme. The site-specific criteria is listed below under each SA objective.

- **SA objective 1.** To achieve the city's ambition to reach net zero **carbon emissions** by 2040.

  See SA Objective 8 for decision-making criteria.

- **SA objective 2**. To build **resilience to climate change**, including reducing risks from overheating, flooding and the resulting detriment to well-being, the economy and the environment.

  Decision-making criteria: Is the use proposed suitable given the flood zone of the site?

Table 5.3: Sites sustainability appraisal scoring criteria for SA objective 2

Category	Flood zones
--	Site is partially or wholly in Flood Zone 3b
-	Site is partially or wholly in Flood Zone 3a or Zone 2

0	Site is in Flood Zone 1
Category	**Flooding of land surrounding site for access/ egress**
--	There is no safe access/egress to/from the site
-	Access/egress from the site is over moderate to low hazard land
0	There is safe access/egress from the site – area surrounding site is FZ1

- **SA objective 3.** To encourage the **efficient use of land** through good design and layout, and minimise the use of greenfield and Green Belt land.

  Decision-making criteria: Will the site make use of previously developed land? And will the site be on Green Belt land?

Table 5.4: Sites sustainability appraisal scoring criteria for SA objective 3

Category	Previously developed land
--	Site is protected open space
-	Site is unprotected open space
0	Site is previously developed land (with buildings in use on site)
+	Site is previously developed land (with vacant buildings on site)
++	Site is previously developed land (cleared)
Category	**Green Belt**
--	Site is on Green Belt land
0	Site is not on Green Belt land

- **SA objective 4.** To meet **local housing needs** by ensuring that everyone has the opportunity to live in a decent affordable home.

  Decision-making criteria: Will the site provide net new housing? And will it improve the availability of decent affordable housing?

Table 5.5: Sites sustainability appraisal scoring criteria for SA objective 4

Category	Housing provision
-	Site would decrease the amount of net new housing
0	Site would provide no net new housing
+	Site would provide up to 10 new homes
++	Site would provide more than 10 new homes
I	Depends on implementation
Category	**Affordable Housing provision**
-	Site is allocated for housing but would provide no affordable housing
0	Site is allocated for use other than housing or is not allocated
+	Site provides up to 50% affordable housing
++	Site provides 50% or more than 50% affordable housing

I	Depends on implementation

- **SA objective 5.** To reduce poverty, social exclusion, and health **inequalities**.

  Decision-making criteria: Will it improve opportunities for people in the most deprived areas? *For the purposes of this assessment, a regeneration area is defined as an area that falls within the top 20% most deprived areas nationally according to the Indices of Multiple Deprivation*.

Table 5.6: Sites sustainability appraisal scoring criteria for SA objective 5

Category	Regeneration Areas
0	Site is not in or adjacent to a regeneration area
+	Site is adjacent to a regeneration area
++	Site is in a regeneration area

- **SA objective 6.** To provide accessible essential **services and facilities**.

  Decision-making criteria: Will it increase the provision of essential services and facilities? *See also SA Objective 8*.

Table 5.7: Sites sustainability appraisal scoring criteria for SA objective 6

Category	Community facilities
-	Allocation leads to a decrease in community facilities
0	Site not allocated for community facilities OR amount of community facilities remain the same due to the allocation
+	Community facilities provided on site
++	Allocation leads to a significant increase in community facilities
I	Depends on implementation

- **SA objective 7.** To provide adequate **green infrastructure, leisure and recreation** opportunities and make these readily accessible for all.

  Decision-making criteria: Will it increase the provision of public open space?

Table 5.8: Sites sustainability appraisal scoring criteria for SA objective 7

Category	Public open space
-	Allocation leads to a decrease in public open space
0	Site not allocated OR amount of public open space remains the same due to the allocation
+	Site allocated for housing – 10% public open space provided on site
++	Allocation leads to an increase in public open space greater than 10% of the total site area

- **SA objective 8.** To reduce **traffic and associated air pollution** by improving travel choice, shortening journeys and reducing the need to travel by car/ lorry. (also SA objective 1: To achieve the city's ambition to reach net zero **carbon emissions** by 2040)

  Decision-making criteria: Will it encourage walking cycling and use of public transport? And is the site within an Air Quality Management Area or in proximity to an Air Quality hotspot?

Table 5.9: Sites sustainability appraisal scoring criteria for SA objective 8

Category	Sustainable transport links (bus stop)
-	> 400m from a bus stop
+	< 400m from a bus stop
Category	**Sustainable transport links (rail station)**
-	> 1600m from train station
0	1200-1600m from train station
+	800-1200m from train station
++	< 800m from train station
Category	**Primary Schools**
-	>800m from the nearest primary school with spaces
+	<800m from the nearest primary school with spaces
Category	**Secondary Schools**
-	>800m from the nearest secondary school with spaces
+	<800m from the nearest secondary school with spaces
Category	**GP Surgeries**
-	>800m from the nearest GP Surgery
+	<800m from the nearest GP Surgery
Category	**Post office**
-	>800m from the nearest post office
+	<800m from the nearest post office
Category	**Air Quality**
--	Site is within or adjacent to a local air quality monitoring hotspot
-	Site is within an Air Quality Management Area (AQMA)
0	Site is not within an AQMA

- **SA objective 9.** To achieve **water** quality targets and manage water resources.

  Decision-making criteria: Does the site contain, or is it near, a water body?

Table 5.10: Sites sustainability appraisal scoring criteria for SA objective 9

Category	Water

--	Site contains a water body (e.g. lake, pond, stream)
-	Site is within 30m of a water body
0	Site is not within 30m of a water body

- **SA objective 10**. To conserve and enhance Oxford's **biodiversity**.

  Decision-making criteria: Will development of the site be able to protect and enhance existing flora, fauna and habitats?

Table 5.11: Sites sustainability appraisal scoring criteria for SA objective 10

Category	Ecology and Biodiversity
--	Contains an internationally or nationally protected site: Oxford Meadows SAC or SSSI
-	Contains or is adjacent to a locally protected site. Within 100m of a nationally/ internationally designated site. Potential for legally protected species to be present
0	Within 100m of a locally protected site or 200m of an internationally/nationally protected site
+	Contains no nature conservation designations but has potential for nature conservation interest. Can improve wildlife linkages or habitat continuity
++	Contains no nature conservation designations but has potential for significant nature conservation enhancement

- **SA objective 11.** To promote **good urban design** through the protection and enhancement of the **historic environment** and heritage assets while respecting local character and context and promoting innovation.

  Decision-making criteria: Is the development of the site likely to affect the significance (including the setting) of one or more heritage assets, including any associated historic, archaeological, artistic and/or architectural features?

Table 5.12: Sites sustainability appraisal scoring criteria for SA objective 11

Category	Archaeology
--	Site contains a nationally important archaeological site (such as a Scheduled Ancient Monument)
-	Site provides the setting to a nationally important archaeological site OR site has known archaeological sites or potential (e.g. close to 'Sites and Monument' symbol or in local area of archaeological importance)
0	Site contains no known archaeological sites or has limited or uncertain archaeological potential
Category	**Conservation Areas & Register of Parks and Gardens (RPG)**
--	Site lies in a conservation area or the site is on the RPG register
-	Site lies on the edge of a conservation area or of a site on the RPG register
0	Site is not in or on the edge of a conservation area or site on the RPG register

Category	Listed Buildings
--	Site contains a listed building
-	Site forms the setting of a listed building or contains a locally listed building
0	Site contains no identified historic building constraint
Category	**View Cones**
-	Site lies within a view cone
0	Site lies outside of a view cone
Category	**Historic Core Area**
-	Site lies within the City Council's locally designated Historic Core Area.
0	Site lies outside the City Council's locally designated Historic Core Area.

- **SA objective 12.** To achieve sustainable inclusive **economic growth**, including the development and expansion of a diverse and knowledge- based economy and the culture/leisure/ visitor sector.

  Decision-making criteria: Will it support key sectors that drive economic growth? And will it increase the quantity and quality of employment opportunities?

Table 5.13: Sites sustainability appraisal scoring criteria for SA objective 12

Category	Employment Opportunities in the knowledge-based economy
-	Site would mean loss of jobs or economic floorspace in knowledge-based economy
0	No change in number of jobs/economic floorspace in knowledge-based economy
+	Site would increase number of jobs or economic floorspace in knowledge-based economy
I	Depends on implementation
Category	**Diversifying the economy end employment opportunities**
-	Site would not support diversification of the employment base or provision of affordable workspace
0	No change in employment base or access to affordable workspaces
+	Site would support diversification of the employment base or provide affordable workspace
I	Depends on implementation

5.8 Figure 5.1 summarises the site-specific criteria and shows how these link with the SA objectives of Table 5.1.

Figure 5.1: Site assessment appraisal criteria versus SA objectives

	SA objectives											
Site assessment criteria	1. Carbon emissions	2. Resilience to climate change	3. Efficient use of land	4. Local housing needs	5. Inequalities and health	6. Services, facilities and infrastructure	7. Green infrastructure and leisure	8. Traffic and air pollution	9. Water	10. Biodiversity	11. Urban design and historic environment	12. Employment and economy
Flood zone		■										
Flood risk on land surrounding site		■										
Type of land (e.g. PDL, Green Belt)			■									
Housing provision inc. affordable housing				■								
Regeneration area					■							
Provision of community facilities						■						
Provision of public open space							■					
Sustainable transport links: bus stop	■							■				
Sustainable transport links: train station	■							■				
Distance to primary school	■							■				
Distance to secondary school	■							■				
Distance to GP surgery	■							■				
Distance to post office	■							■				
Air quality								■				
Water									■			
Ecology and Biodiversity										■		
Archaeology											■	
Conservation area, RPGs											■	
Listed buildings											■	
View cone											■	
Historic Core Area											■	
Employment opportunities												■

6. Feedback from the consultation bodies on the scope of the SA report (Sustainability Appraisal Task A5)

6.1 Fulfilling the requirements of the Strategic Environmental Assessment legislation, the Council sought to make an early version of this scoping study (incorporating Tasks A1 to A4) available to the consultation bodies for feedback on the scope of the report. The Council made this document available for six weeks to the consultation bodies (Historic England, Natural England and the Environment Agency) via email on January 17th 2025 and invited feedback by February 28th 2025. This section summarises the feedback received, which is set out in Table 6.1.

Table 6.1: Key feedback received on early Sustainability Appraisal Scoping Study and Council responses from Natural England (NE), Environment Agency (EA) and Historic England (HE)

Respondent	Feedback provided	Council response
NE	Welcome the key issues identified within the report and support the SA objectives within the framework as they aptly cover our interests in the natural environment. We have no further comments to make on this consultation.	Feedback noted, no further actions proposed.
EA	Consider the SA Objectives highlighted in topic papers [Green Infrastructure and Biodiversity; Flood risk, SuDS and drainage and Natural Resources including air, water, soil quality and Infrastructure] of interest to the Environment Agency to be satisfactory.	Feedback noted, no further actions proposed.
EA	Agree with the key sustainability issues listed in Topic Paper 9 highlighted as issues for the Local Plan to address. Pleased to note in Topic Paper 9, that Oxford City Council will undertake a Water Cycle Study -WCS.	Feedback noted, no further actions proposed.
EA	*"Prioritising brownfield land for development may reduce opportunities for the remediation of contaminated sites which could be repurposed for public amenity or as green infrastructure with a focus on ecological/biodiversity functions."* If this is a key issue that the proposed plan will address, then the above point is not clear.	Background paper amended.
EA	Point also under *'Land/soils' should read; - "Restoration and protection of carbon-rich peat reserves that have already been degraded by historic development in the city."*	The Local Plan is limited in how it can drive restoration but point has been reworded in Background paper to try and accommodate.
EA	In Topic Paper 7, under the key issues for the Local Plan to address, the last bullet point should read; *"There will be residual risks of flooding after applying the Sequential approach Test to locating development and incorporating flood defence measures.*	Background paper amended.
EA	It is stated in Topic Paper 9 that; *"Oxford has seen significant industrial change to the present day in fact Oxford's industrial*	Background paper amended.

Respondent	Feedback provided	Council response
	history has resulted in a substantial amount of land affected by contamination." To further ensure the local plan addresses the protection of ground water resources, the Environment Agency's guidance on groundwater protection should also be referenced.	
EA	In Topic Paper 14, under the issues for the Local Plan to address, the last bullet point should read; *Meeting the wastewater infrastructure needs of additional development in the city over the Local Plan period. This is because of the awareness of how challenging this issue is*. Also, in Topic Paper 14, the list of policy framework/plans, policies and programmes should include the forth coming Water Cycle Study.	Background paper amended, the Water Cycle study has been referenced in the water infrastructure sub-section of the current situation section of the paper. The study is also referenced in topic paper 009 which talks about water resources/quality more generally.
EA	Note the list in Section 3 A as well as in topic papers 5, 7, 9 and 14 of relevant Policies, Plans and Programmes and consider it satisfactory. The plan maker (Oxford City Council) would need to update the Strategic Flood Risk Assessment and Water Cycle Study evidence base to help them understand the impact of planned growth in Oxford City Council on flood risk, water quality and resources. We suggest the following are also added to the list as they are relevant to the preparation of the local plan. • Planning Practice Guidance - Flood risk section, • Environment Agency SFRA Guidance, • Flood and Water Management Act 2010, • Flood Risk Regulations 2009 , • Strategic flood risk assessment good practice guide. • Water cycle studies guidance • Water supply, wastewater and water quality - GOV.UK	Noted, we agree many of these resources are useful, though some of it is practical guidance that may be better referenced elsewhere. Some are referenced in the relevant background papers, particularly BP007 on flood risk. Additionally, some of this guidance will be useful for preparing evidence base (SFRA and Water Cycle Study) and can be referenced there where appropriate.
EA	Regarding collecting baseline information: Advise a focus on updating the evidence base i.e. Strategic Flood Risk Assessment (SFRA) level 1 and 2 and producing the Water Cycle Study (WCS) which are useful in informing growth in Oxford City. Important to capture changes to national policy as well as to any flood map changes in Oxford, but also to understand the impact of growth on the water environment.	Noted, we have updated section 1.6 to flag we are aware of need for updating these docs and that this is happening in due course (as well as referring to them in relevant background papers).
EA	Consider that the environmental problems described in Section 5 (Table 5.1) highlight the main issues of relevance for the SEA topics/themes within the EA's remit. And the key environmental issues and trends which characterise Oxford appear to be highlighted. The Environment Agency would expect Oxford's local plan to cover the following topics, but not limited to: Net Gain; Flood risk management; Climate change; Strategic water planning; Drainage and infrastructure; Green and blue infrastructure; Contaminated	*For reference, Table 5.1 is now Table 4.1 in updated version of this report.* Comment is noted, the Regulation 18 first draft local plan addresses all these topics across its various draft policies (note some

Respondent	Feedback provided	Council response
	land; Water Framework Directive objectives; Biodiversity; Waste management.	topics are grouped into other policies).
EA	Table 6.1: 'SA/SEA framework for plan objectives, alternatives and policies', the SA objectives and issues covered under the various SEA themes appear reasonable. Make the following suggestions: • SA objective 3: would be beneficial to include soil and land contamination under the issues that the 2042 plan will address, considering Oxford's industrial history which has resulted in a substantial amount of land affected by contamination. • For assessing the impacts of the sites and their ability to support sustainable development, we encourage the inclusion of a commentary section within the framework matrices to state, where necessary, the reasons for the effects cited and the score given to help explain the rationale behind the assessment results. This allows the transparency and also allows the reader to understand the rationale behind the scores given.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report.* SA objective 3 has been amended to make it clearer that land contamination would also be factored into issues considered. A comments box to record rationale for scoring of sustainability impacts in the site assessments is included alongside the score itself and would be used where necessary.
EA	It is important for alternatives to be considered from an early stage in the process. It appears an appraisal of Reasonable Alternatives has not yet been undertaken but will be carried out at the Regulation 18. The plan-maker may use a hierarchy to help identify suitable alternatives when considering plan options. The same hierarchy can be used to judge if suggested alternatives are reasonable, realistic and relevant. The diagram in Table 14 in Annex 5 of A Practical Guide to the Strategic Environmental Assessment Directive (publishing.service.gov.uk) contains further advice on developing and accessing alternatives can be found.	Comments are noted, for the Regulation 18 consultation, a Part 2 report is included as part of the Interim Sustainability Appraisal which addresses this.
EA	Other minor points: Please amend sentence in section 1.1 to: - 'It will need to include measures to improve public transport, protect the historic environment, protect and enhance the natural environment, and nature, reduce carbon emissions, and protect against flooding.' We agree with the key problems in Oxford outlined in section1.3. It will be useful for section 2.1 to include the fact Rivers form an intrinsic part of the unique environment of Oxford city and promotes tourism and a range of important water-based sports and social activities in the city. In Table 4.2: Current situation and likely future without the plan, we agree that without the 2042 plan, there will be Very negative impacts (compared to the current situation) on water resources. We note the Table states that the impact of the 2042 plan on water quality is unclear. We believe this is likely to end up being positive (compared to the current situation). This is because of the willingness by Oxford City Council to address water quality issues	Report has been amended in response to these points.

Respondent	Feedback provided	Council response
	by engaging with the Environment Agency as well as working on producing a Water Cycle Study evidence to inform growth in Oxford City.	
HE	The Scoping Report is light on detail about heritage policies, plans and programmes, and Background Paper 11 includes only some of this content (principally within a section on "Current situation"). Analysing this in more detail, SA Objective 11 considers both designated and non-designated heritage; but the background paper centres only on designated assets. We recommend strengthening the SA baseline by updating Background Paper 11 and adding more detail that connects with designated and non-designated assets and associated programmes, such as the Oxford Heritage Asset Register and work on the local Historic Environment Record. Also, this would offer an opportunity to recognise the extent and nature of non-designated archaeological remains in Oxford which have been discussed during LP2040 production.	Background paper amended, additional detail added to section 2 and 3 including highlighting the presence of non-designated heritage.
HE	Need to correct Background Paper 11 regarding entries in Oxford on the national Heritage at Risk Register (the wrong 3 assets are listed) and we recommend liaison with the Council's conservation team regarding the position on local buildings at risk.	Background paper amended, references have been updated to reflect the current situation.
HE	The Cowley study merits inclusion in any revised Background Paper 11, as an important piece of the Council's expanding evidence base.	Background paper amended, reference to the emerging work has been added.
HE	We are broadly comfortable with the proposed SA Framework and draft objectives. Regarding decision-making criteria, SA objective 11 should refer to setting and/or the interests that collectively comprise significance. A focus solely on archaeological or historic features within the site could miss wider impacts and opportunities. Potential wording for consideration: "~~Does~~ Is development of the site likely to affect the significance (including the setting) of one or more heritage assets, including ~~contain~~ any associated historic~~al~~, ~~or~~ archaeological, artistic and/or architectural interests ~~features~~?"	Decision-making criteria related to Table 5.12 has been updated for the site assessment framework using suggested wording.
HE	Page 14: presumably the Scoping Report will be updated to reflect recent announcements regarding support for growth in the Oxford – Cambridge corridor. Page 25: Unsure that a future without a new local plan can be considered positive for heritage. Note in background paper 11: "For Oxford, this lack of local level policies could present a real risk to the unique heritage of the city. "	The scoping report has been updated to reflected the recent announcements. In relation to likely future without a new local plan, the policies of the LP2036 would continue to apply and there would remain strong protection through national

Respondent	Feedback provided	Council response
		policy, though we assessed that positive impacts would be reduced in this scenario due to reduced ability to respond to ongoing pressures or changes in local context. We are happy to discuss this detail further however.
HE	Page 32: we advise minor wording changes to the text linked with SA objective 11 in Table 5.1, specifically we suggest: • revised wording for the second bullet, focusing on formal assessment of heritage impacts, rather than consideration of impacts on archaeological and historical value: "Potential heritage impacts of new development proposed in the plan should be assessed, both in terms of any direct physical impacts and impacts on setting ~~on areas of archaeological and historical value should be considered~~." • Revised wording for the third bullet, adding reference to heritage significance and the challenges arising from the intensification of existing sites: "Development pressures continue to put a strain on natural and historic sites and landscape/townscape features of Oxford. A good understanding of heritage value will be required to ensure continued development pressure associated with new sites and the intensification of existing sites does not adversely affect the significance of heritage assets, important townscape features and local character."	*For reference, Table 5.1 is now Table 4.1 in updated version of this report.* We have made amendments to the text in response to these points.
HE	Pages 37 – 39 (Table 6.1): as the Council is aware, "non-heritage" themes such as carbon emissions and green infrastructure have a heritage dimension. No major changes to the approach suggested – though reference to heritage is worth considering as an issue for SA Objectives 1, 2 and 7 and 12. There is scope to embed such nuance in other relevant topic papers as appropriate, which in turn inform relevant sections of the new plan, and potentially Table 6.2. We look forward to continuing our positive engagement with the Council on the cross-cutting nature of heritage. Also note, for objective 11 the issues should also include other non-designated assets, not just those of local importance.	*For reference, Table 6.1 is now Table 5.1 in the updated version of the report.* Comments around cross-cutting nature of heritage are noted and something we will keep in mind as we prepare the plan. Objective 11 has been tweaked re: non-designated assets.
HE	Page 44 (Table 6.12): we suggest deleting "(Scheduled Ancient Monument)" in the top row. Including only Scheduled Monuments implies non-designated archaeological assets of national importance are not treated in the same way, which we do not believe is the intention.	*Table 6.12 now Table 5.12 in updated draft in the updated version of the report.* We have updated the wording to reflect that Scheduled Monument is one consideration (but may not be the only one).

Respondent	Feedback provided	Council response
HE	Strongly recommend liaison with the Council's conservation team and archaeological advisers to inform the approach to SA. They are best placed to advise on: local historic environment issues and priorities.	Comment is noted.

7. Conclusions

7.1 This Part one Interim Sustainability Appraisal Report addresses the scoping stages of the Sustainability Appraisal process. It sets out the key baseline information and existing issues for the city which the new Local Plan will need to respond to, which are expanded upon further in the associated background papers informing the Regulation 18 consultation. It also sets out the SA/SEA assessment framework which is derived from 12 Sustainability Objectives, which will be used to appraise the emerging Local Plan.

7.2 An early draft of this report has been shared with members of Natural England, the Environment Agency and Historic England, and their feedback has been incorporated into the version of the report that has been published for the Regulation 18 consultation. Additional feedback provided as part of the Regulation 18 consultation will help to inform the review process and any necessary updates as the Council prepares its Regulation 19 Sustainability Appraisal.