

Background paper 005

Title: Green Infrastructure and Biodiversity

This paper addresses the green infrastructure network, including the protection of green spaces and other features like trees, as well as the provision of new green infrastructure in development. It also discusses the protection of biodiversity, including designated sites, as well as enhancing biodiversity.

Relevant Local Plan Objective(s):

- Secure strong, well-connected ecological networks and net gains in biodiversity.
- Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property.
- Protect and enhance Oxford's green and blue network.
- Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.

SA Objective(s):

7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all.
10. To conserve and enhance Oxford's biodiversity.

SEA theme(s): Landscape, human health, biodiversity, flora, fauna.

1. Introduction.....	3
2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal).....	5
National Planning Policy Framework (Dec 2024).....	5
Planning Practice Guidance and National Design Guide/Model Design Code	6
The Environment Act	7
Natural Environment and Rural Communities Act 2006	7
Conservation of Habitats and Species Regulations 2017 (as amended)	7
National Parks and Access to the Countryside Act 1949	7
Small Holdings and Allotments Act 1908	7
Oxford Local Plan 2036.....	8
Other relevant plans and programmes/strategies	8
Natural England Green Infrastructure Framework (2023)	8
Oxford City Council Green Spaces Strategy 2013-2027	8

Oxford City Council Playing Pitch Strategy 2022-2036.....	8
3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)	9
Green infrastructure	9
Biodiversity	13
The Oxford Meadows Special Area of Conservation (SAC)	14
Sites of Special Scientific Interest (SSSIs)	14
Local ecological designated sites.....	16
4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal).....	18
Green infrastructure	18
Biodiversity	19
5. Options for Local Plan 2042	20
Policy options set 005a (draft Policy G1): Protection of GI network and green features..	21
Policy options set 005b (draft policy G2): Enhancement and provision of new GI features	25
Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor	29
Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity	32
Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity.	36
Policy options set 005f (draft policy G6): Protecting Oxford’s ecological network.....	39
6. Conclusions including key sustainability issues	45
Key sustainability issues for the Local Plan to address:.....	45
Preferred approaches for the Local Plan 2042.....	46
Protection of Green Infrastructure network and features – draft Policy G1	46
Enhancement and provision of new Green Infrastructure Features – draft Policy G2 .	46
Provision of new Green and Blue Infrastructure: Urban Greening Factor – draft Policy G3.....	46
Delivering mandatory net gains in biodiversity – draft Policy G4	47
Protecting and enhancing onsite biodiversity – draft Policy G5.....	47
Protecting Oxford’s ecological network – draft Policy G6.....	47

1. Introduction

- 1.1 The green infrastructure network is an important issue to be addressed in the new Local Plan. There are various definitions used for the term Green infrastructure (GI); however, the 2024 [National Planning Practice Framework](#) (NPPF) defines it as:

A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

- 1.2 The [Planning Practice Guidance](#) sets out that green infrastructure includes both green and blue spaces and can include:

A range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.

- 1.3 Green infrastructure forms an essential part of the city's natural capital which is the various elements of the natural environment which provide us with valuable goods and services. An important feature of GI is its multi-functional nature, which means that it can perform a range of services from which people can benefit and which can contribute positively to achieving various policy objectives. Such services include, supporting physical and mental health and wellbeing; encouraging investment and regeneration; building resilience to climate change; providing space for nature and supporting biodiversity; reducing flood risk; and contributing to improved air quality (Table 1.1). The Council must balance competing development needs in the city whilst also ensuring that it plans in a positive way for the creation, protection, and enhancement of Oxford's green infrastructure so that these various benefits can be maximised for the city in the future.

Table 1.1 - The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

Environmental
• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaptation, e.g., through providing flood and soil erosion protection, carbon sequestration and storage, urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking
Social/Health and Wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive safe spaces for people to enjoy and improve social contacts – a key component of ‘liveable’ towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land property values. • Supports sustainable homes and communities e.g., through providing local food, building materials, encouraging low carbon lifestyles e.g., through well-connected attractive travel walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaptation.

 Environmental
• Supports and provides biodiversity (which underpins healthy and resilient ecosystems) and species movement/dispersal including through providing habitat, wildlife corridors and stepping-stones. • Provides climate change mitigation and adaption e.g., through providing flood and soil erosion protection, carbon sequestration and storage, and urban cooling. • Improves air and water quality (pollution absorption and removal). • Enables food production and supports pollination. • Supports and creates attractive and sustainable places and landscapes i.e., quality placemaking.
 Social/health and wellbeing
• Provides opportunities for outdoor recreation, exercise, play and access to nature. • Provides attractive and safe spaces for people to enjoy and improve social contacts – a key component of 'liveable' towns and cities where people want to live. • Supports the development of skills and capabilities. • Improves air and water quality, provides urban cooling and shade, reduces noise pollution. • Provides green active travel routes.
 Economic
• Provides attractive places to live and work, attracting inward investment and tourism. • Increased land and property values. • Supports sustainable homes and communities e.g., through providing local food and building materials, encouraging low carbon lifestyles e.g., through well connected and attractive walking and cycling routes. • Provides health and wellbeing benefits that result in avoided healthcare costs. • Provides local food, energy, and timber production. • Climate change mitigation and adaption.

Table 1: The various benefits that green infrastructure can provide to an area (source: Oxford Green Infrastructure study 2022)

- 1.4 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

2. Policy Framework/Plans, Policies, Programmes (supporting Task A1 of Sustainability Appraisal)

National Planning Policy Framework (Dec 2024)

- 2.1 Highlights that planning for green infrastructure can help deliver a variety of planning policy objectives. Specifically, **para 20** states that green infrastructure is an element which local planning authorities should address in their strategic policies. **Para 164 and 199** highlight that green infrastructure should be considered as important mitigation measures

for the impacts of climate change and poor air quality. Further references are made to green infrastructure elsewhere in the document:

- **Para 35:** plans should set out the development contributions expected in association to green infrastructure and set out the levels and types required.
- **Para. 96:** Provision of safe and accessible green infrastructure is one example of a way that local authorities can enable and support healthy lifestyles.
- **Para. 135:** developments should optimise the potential of the site to accommodate and sustain an appropriate amount/mix of development including green and public space.

2.2 With regard to open space, **para 103** of the NPPF sets out that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and climate change, and that local plan should assess what open space is needed and make provision to accommodate this. **Para 104** sets out strict conditions for when loss of open space, sports land/buildings and pitches can be lost.

2.3 In relation to Biodiversity, the NPPF also sets out:

- **Para 187:** that plans should: recognise the wider benefits from natural capital and ecosystem services such as trees and woodland, and minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- **Para 188:** that Local Plans should distinguish a hierarchy of designated sites and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- **Para 192:** that local plans should identify, safeguard components of wildlife-rich habitats and wider ecological networks; promote the conservation/restoration/enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify/pursue opportunities for securing measurable net gains for biodiversity.

Planning Practice Guidance and National Design Guide/Model Design Code

2.4 The online Planning Practice Guidance has a dedicated page for the [natural environment](#) including green infrastructure and biodiversity considerations. Paragraphs 4 to 8 include guidance on why green infrastructure is important and how local plans should take a strategic approach to addressing it including use of strategic policies to identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. Open space is addressed in separate guidance and sets out how this should be taken into consideration in Local Plans to support health and wellbeing.

2.5 In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and habitats; 'proportionate' information and assessment required on biodiversity impacts at all

stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

- 2.6 The National Design Guide is a material consideration and forms part of national planning guidance. The guide sets out ten characteristics of good design, of which designing to incorporate nature is one. It highlights the value that natural spaces can bring to people and encourages networks of green and blue infrastructure within the design of spaces as well as making space for biodiversity.

The Environment Act

- 2.7 This legislation received Royal Assent on 9th November 2021 and includes provisions to strengthen and improve the duty on public bodies to conserve and enhance biodiversity. In particular, it introduces a mandatory requirement for net gains in biodiversity of 10% from most forms of new development approved through the planning system, this must be calculated using the DEFRA Biodiversity Metric and informed by a biodiversity gain plan which details the strategy for how biodiversity net gain will be delivered. The Act also requires the preparation and publication of Local Nature Recovery Strategies to support Nature Recovery Networks by setting out priorities for nature recovery and proposing actions in the locations where it would make a particular contribution to achieving those priorities. These Recovery Strategies are to be prepared by 'Responsible Authorities' as appointed by the Secretary of State, Oxford falls into the strategy that will cover the Oxfordshire County area.

Natural Environment and Rural Communities Act 2006

- 2.8 Section 40 of this Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.9 Legislation that previously transposed the European Habitats Directive (European Commission 92/43/EEC) into English law was amended upon exit from the EU in order to transfer functions from the European Commission to the appropriate authorities in England and Wales but otherwise functions broadly the same. The Regulations designate Special Areas of Conservation (SAC) and Special Protection Areas as priority locations for biodiversity conservation. In Oxford, this is the Oxford Meadows SAC, and near Oxford are the Cothill Fen SAC and Little Wittenham SAC. The effects of any plan or programme on these designated areas must be assessed via a Habitats Regulations Assessment (HRA).

National Parks and Access to the Countryside Act 1949

- 2.10 Section 21 of this Act enables local authorities to designate Local Nature Reserves where they are of high natural interest in the local context.

Small Holdings and Allotments Act 1908

- 2.11 This places a duty on local authorities to provide allotment gardens where demand for them exists. Requests for allotments submitted by at least six local people must be taken into account when considering whether demand exists. Allotment provision is also subject to other legislation arrangements less related to the planning process, including the Allotments Acts of 1922, 1925 and 1950.

Oxford Local Plan 2036

- 2.12 The topic of green and blue infrastructure in the city is addressed in detail in chapter 5 of the adopted Local Plan, 'Protecting and enhancing Oxford's green and blue infrastructure network', through policies G1 to G8. As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network including policy G2 which addresses biodiversity and the ecological network specifically, including protections for national and locally designated sites.

Other relevant plans and programmes/strategies

Natural England Green Infrastructure Framework (2023)

- 2.13 The [Green Infrastructure Framework](#) was launched by Natural England in 2023. It is a collection of policy tools and documents whose purpose is to assist local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development. The framework is structured around a number of key components that include a set of national standards on quantity/quality of GI; mapping; planning and design guidance. Whilst the Green Infrastructure Standards have no statutory power, they are intended to support better planning for good quality GI and help to target the creation or improvement of GI, particularly where existing provision is poorest. When supplemented with local knowledge and evidence, Natural England advise that they can be used to help set local targets for provision.

Oxford City Council Green Spaces Strategy 2013-2027

- 2.14 The strategy focuses on green space that is freely available to the public for informal recreation, allotments and play irrespective of who the land is owned by.

Oxford City Council Playing Pitch Strategy 2022-2036

- 2.15 This strategy is a needs and evidence-based document that is aligned with the adopted Local Plan, and it seeks to ensure that the city has a good supply of well-managed, well-maintained and efficient playing pitches and other outdoor sports facilities that would help to encourage residents to maintain healthy and active lifestyles. Whilst there was no legal requirement for a Playing Pitch Strategy, the Council had opted to develop one as one of the ways to promote healthier living and reduce inequality. The Strategy is intended to be reviewed every year and refreshed on a five yearly basis.

3. Current situation (supporting Task A2 and A3 of Sustainability Appraisal)

Green infrastructure

- 3.1 The Green Infrastructure study (2022) identified that Oxford's green spaces are providing a variety of roles that support health and wellbeing of residents and ecosystems. With regard to publicly accessible green spaces, the analysis highlighted that whilst there is a fairly even distribution of green spaces across the city in general meaning that accessibility for residents to walk or cycle to green spaces was good, however, there are inequalities in distribution of certain types of green spaces resulting in gaps in accessibility for specific types of green space. Whilst it is very challenging to establish significant new green space to counter these gaps, additional loss of open space in certain areas could exacerbate these accessibility problems or establish access deficits for other types of green space like parks or outdoor sports. In summary, the report found that:
- Allotments: Gap in access in the eastern part of the city centre (low deprivation) (however much of this area is university land), and smaller gaps in the north (low deprivation) and west (pocket of high deprivation) of the study area.
 - Amenity green space: large gaps in access in the north and east of the city (low levels of deprivation, and small gaps in the south in Littlemore and Temple Cowley (high levels of deprivation). However, the good access to parks and recreation grounds across the city mitigates this.
 - Parks and recreation grounds: Good access across the city. Small gap in the north in Wolvercote (low levels of deprivation) but there is access to amenity green space and accessible natural green space in this area, which helps to mitigate this gap in access (although it is acknowledged that these types of spaces do not typically offer the same level of facilities that a park might).
 - Accessible Natural Green Space (15-minute walk time buffer): large gaps access in Cowley/Temple Cowley in the south and in the North (around Sunnymead), both in areas with relatively high levels of deprivation.
 - Play space: for children's play spaces, gaps in access in the city centre (although much of this area is university land) and North Oxford (low levels of deprivation). There is also a gap in the south in Iffley (IMD decile of 6). For youth play spaces, small gaps in access in the centre and north of the city centre (in areas of low deprivation).
- 3.2 Informed by more than 200 site visits, the report also looked at quality and multi-functionality of the open spaces (helping to assess wider benefits they play to the local areas). It found that:
- The majority of public open spaces in the city (84%) were currently of good or excellent quality, however there are opportunities to improve quality on some spaces, with 16% assessed as fair or poor quality.

- Generally, the highest quality sites fall within areas of lower levels of deprivation, however there are exceptions to this. The wards with generally higher numbers of poorer scoring sites are Marston, Headington Hill and Northway, Quarry and Risinghurst, Barton and Sand Hills, Churchill and Lye Valley.
- Larger/destination parks within the city are high quality sites providing multiple functions and are important sites for tourism and built/natural heritage.
- Sites delivering very low numbers of functions tend to be private spaces and amenity green spaces. Smaller sites, including other typologies, typically delivered fewer functions (though not in all instances) and there are areas with lower levels of multifunctionality in the south and east of the city (which generally corresponds with areas of high deprivation).
- For lower scoring sites, common issues appeared to be low biodiversity value, poor access (e.g. path quality and overgrown vegetation), management of soft landscaping, dog fouling, litter and lack of signage.

- 3.3 Beyond public open spaces, there are a variety of greenspaces in the city which are not freely accessible to public, yet still make an important contribution to the overall green infrastructure network. For example, many of the schools and colleges in the city have their own playing fields and outdoor spaces which play an important role in the health and wellbeing of the young people and children in attendance and add to the sense of place locally (sometimes playing an important role in heritage setting particularly around the colleges).
- 3.4 According to land use data (2018), around 19.9% of Oxford's land use is classified as residential gardens. There is diversity in the amounts of green infrastructure that is present across Oxford gardens and policy has little control over how they are managed but many of these spaces nevertheless are an important location for green assets like trees in the city. Whilst only being accessible to individuals within the home, private gardens offer an important outdoor space for socialising and being active. Of course, there is not an equal distribution of this type of space across the community, and many individuals, particularly those living in flatted developments or house shares, may not have any privately accessible green space at all.
- 3.5 The GI study found that some of areas of the city with the lowest amounts of private garden are located in areas with lowest access to public open space. In these locations (highlighted in red and yellow in Figure 3.1), there is potential for existing open space to be under greater pressure from local residents. Notably, some of these locations are also areas of higher deprivation which could exacerbate existing health inequalities where residents are not able to benefit from sufficient outdoor space.

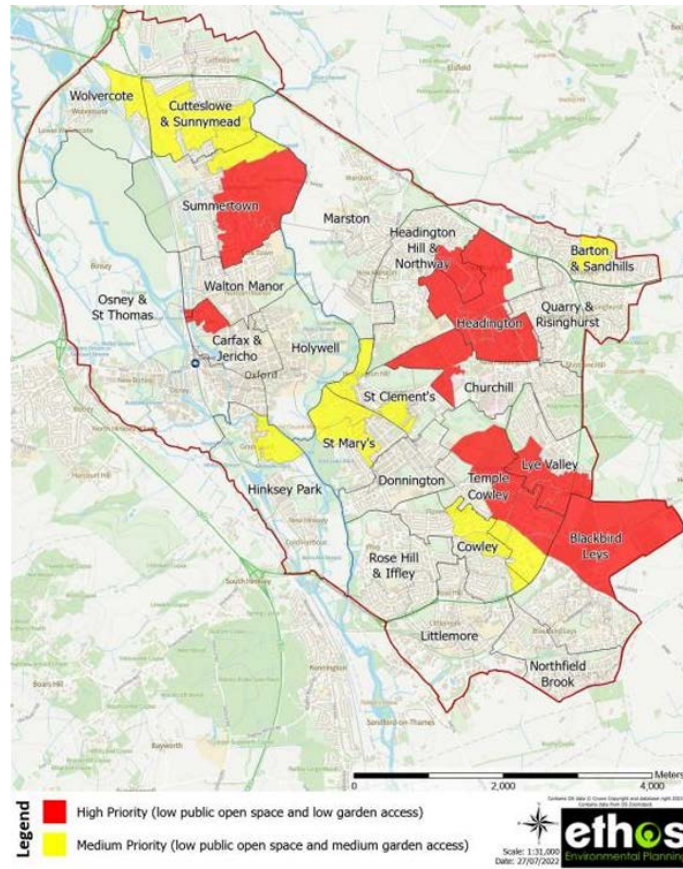


Figure 3.1 - Bivariate map showing areas of the city with lowest public open space in combination with lowest garden access (red are lowest)

- 3.6 Beyond green spaces, the city hosts a range of other important green infrastructure features such as trees. Trees are present in our greenspaces but also help to break up the urban fabric of roads and streets throughout the city. Many of these trees have been protected for their high amenity value through Tree Preservation Orders (TPOs) however there are a greater proportion that have not (and TPO designation is not the only determiner of high-quality trees). Oxford is also home to several areas of ancient woodland, including Brasenose Wood and at Shotover Country Park. The [Oxford Urban Forest Strategy](#) estimates that the urban forest in Oxford contains approximately 248,000 trees which equates to a total canopy cover of 22.3%; meanwhile separate analysis that used a slightly different methodology conducted for the GI study concluded with a similar figure of 21.02%. This is above the 20% minimum recommended by Forest Research for urban areas which is a positive, however, as Table 3.1 shows, canopy cover does vary across the city with some of our more deprived wards featuring some of the lowest amounts of coverage (e.g. Blackbird Leys).

Table 3.1 - Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived)
------	---------------------------------------	---

Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	1
Churchill	28.1	3
Cowley	19.71	4
Cotteslowe & Sunnymead	31.02	4
Donnington	22.28	2
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	4
Lye Valley	22.74	5
Marston	22.59	3
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	2
Summertown	26.26	6
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived).
Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	6
Churchill	28.1	3
Cowley	19.71	4
Cotteslowe & Sunnymead	31.02	4
Donnington	22.28	4
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	2
Lye Valley	22.74	5
Marston	22.59	7
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	5
Summertown	26.36	8
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

Table 2: Canopy cover % and Indices of Multiple Deprivation score per ward as shown in the Oxford Green Infrastructure Study (2022)

- 3.7 The GI network also includes a range of blue spaces including the two rivers (Cherwell and Thames), a number of streams and smaller water courses, as well as the canal and other waterbodies like ponds and lakes. These features act as important corridors through the city and in between green spaces, providing habitat for wildlife and connectivity for people. The Water Cycle Scoping Study will discuss the current environmental conditions of the main water courses, which continue to be challenged by a range of pollutants such as from agriculture, urban runoff and sewer discharges.

Biodiversity

- 3.8 It has long been noted that the biodiversity around the country is under intense pressure and has been in prolonged decline. This biodiversity loss is particularly pronounced in cities and urban areas such as Oxford as wildlife is forced out of natural habitats due to development pressure, recreational disturbance, pollution from various sources, as well as climate change. A particular issue in the city relates to the ecological conditions in Oxford's rivers and streams as water quality is being put under pressure from various sources including sewage discharges, invasive species and pollutants arising from agricultural practices upstream. This issue is explored in greater detail in the separate Natural Resources Background paper and more fully in the Water Cycle Scoping Study.
- 3.9 Nevertheless, Oxford benefits from a concentration of rare and valuable habitats that are important refuges for a variety of flora and fauna, including lowland hay meadows,

calcareous grassland, alkaline spring fen (among other types of wetland) as well as pockets of woodland. A number of sites have been designated as being of particular importance to ecology including:

The Oxford Meadows Special Area of Conservation (SAC)

- 3.10 An internationally important site of nature conservation importance. The SAC is situated on the broad floodplain of the River Thames to the west and north-west of Oxford. The site is made up of an extensive complex of meadows and pastures which support species-rich grassland vegetation which would once have been widespread on floodplains in lowland England, but which is now very rare. The qualifying features for which the area was designated as a SAC are the presence of Lowland Hay Meadows habitat and the species *Apium repens* (creeping marshwort), which is a very rare plant of seasonally-flooded habitats. The Port Meadow population of this plant remains the largest and most consistently recorded in the UK.
- 3.11 Natural England's assessments indicate that the colony of *Apium repens* is under pressure from hydrological changes in the areas, possibly due to deeper, more prolonged and frequent flood episodes. There is also concern about invasive species moving into the habitat from other parts of the meadow and outcompeting the plant. Additionally, previous liaison with Natural England relating to Habitat Regulations Assessments work undertaken by the Council for the SAC have identified potential vulnerabilities arising from the impacts of air pollution (from traffic on the nearby roads), recreational disturbance due to increased visitors to the area (particularly those with dogs), as well as impacts from changes to hydrology and water quality as noted above.
- 3.12 There are also two other SACs within 20km of Oxford, these are:
- **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 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. It 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 2015, the last year of analysis of Little Wittenham, it was of good overall ('global') value, but it is highly threatened by non-native invasive species.

Sites of Special Scientific Interest (SSSIs)

- 3.13 These nationally important designated sites include four geological SSSIs and eight ecological SSSIs that are wholly or partly within the city, as well as others nearby. Four of these SSSIs comprise the Oxford Meadows SAC: Cassington Meadows SSSI; Pixey and Yarnton Meads SSSI; Port Meadow with Wolvercote Common and Green SSSI; and Wolvercote Meadows SSSI.

3.14 Natural England intermittently publishes condition assessments for the units comprising the SSSIs, which is available on the [Designated Sites View website](#). These assessments are usually 5-10 years old, as such the condition may have changed in the intervening years since the last assessment was completed. As can be seen in Figure 3.2 and Table 3.2, the SSSIs are in varying condition, and of the twelve within or partially within the city, two SSSIs are in unfavourable condition and three are partly in unfavourable condition, whilst the others are in a favourable condition.

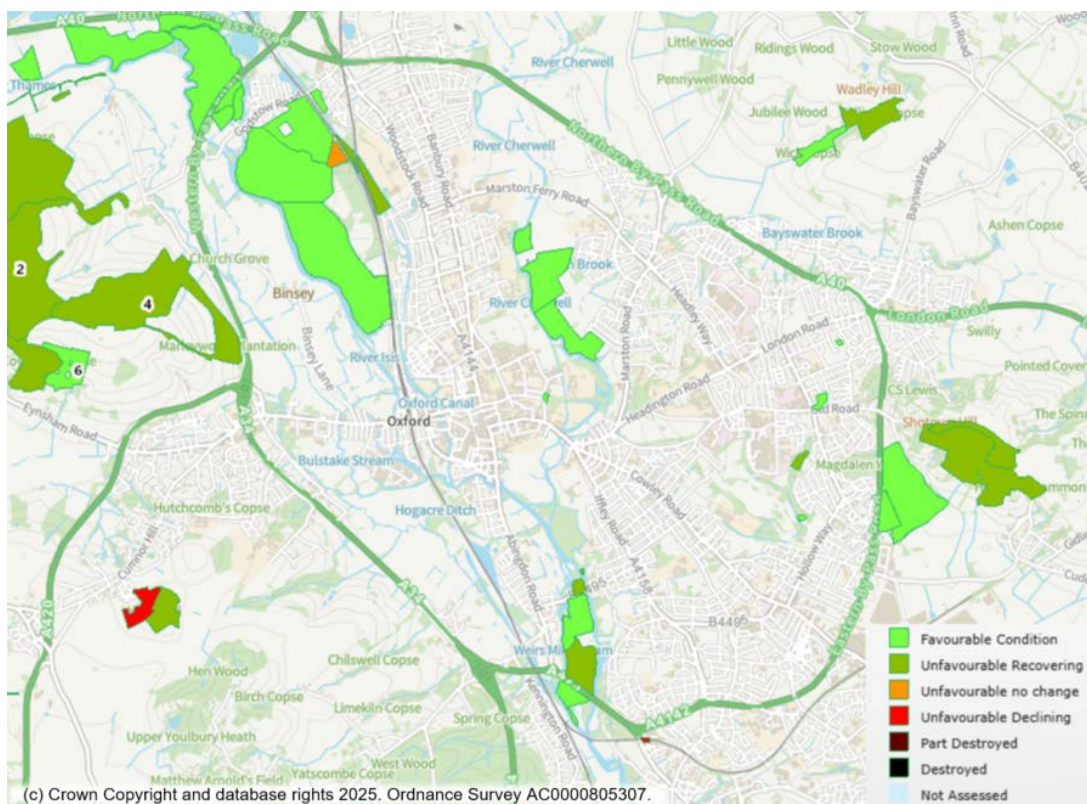


Figure 3.2 - Locations of Special Scientific Interest (SSSIs) within and around Oxford and their condition, source: [DEFRA MAGIC website](#) accessed 13.01.25)

Table 3.2 - Condition assessment for the Sites of Special Scientific Interest (SSSIs) within Oxford or nearby (Natural England)

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 (also comprises part of Oxford Meadows SAC)	100.00% Favourable
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 (<i>also comprises part of Oxford Meadows SAC</i>)	100.00% Favourable
Port Meadow with Wolvercote Common and Green	167.15ha	Yes (<i>also comprises part of Oxford Meadows SAC</i>)	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 (<i>also comprises part of Oxford Meadows SAC</i>)	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

Local ecological designated sites

- 3.15 The city includes a number of locally important sites made up of Local Wildlife Sites, Oxford City Wildlife Sites and Local Nature Reserves. These are non-statutory sites of local importance for nature conservation, recognised for having high conservation value, containing rare species or habitats whose protection is bestowed upon them via the policies of the Local Plan rather than national legislation. This means that our policies will be particularly important for these local features which do not reach of the benchmark of higher protections and yet can still be valuable refuges of priority habitats and for local species.
- 3.16 Local Wildlife Sites are designated through criteria that is shared across the county, meanwhile Oxford City Wildlife Sites are sites of importance to the city which were established as part of work on the Local Plan 2036 (replacing what were previously known as Sites of Local Importance to Nature Conservation or 'SLINCS'). Whilst the overall interest of OCWSs has not been considered sufficient to be of county level importance in the same way LWSs are, with appropriate management, many do however have the potential to become LWSs in the future. The Thames Valley Environmental Records Centre (TVERC), undertake yearly reviews of sites across the county and assign LWS status on new sites where these are deemed to meet specific criteria.
- 3.17 As part of its work on the Local Plan 2040, the Council undertook a high-level review of its existing OCWSs to consider whether it was still appropriate to protect them and whether there were additional sites that might meet the criteria of local designation as either an

OCWS (or LWS). This review was supported by a limited number of new surveys undertaken throughout 2023. As set out in Table 3.3, the work resulted in four previously proposed OCWSs being formalised (although in practice, these were already treated as full OCWS sites because of their proposed status at the time), as well as the addition of three new OCWSs. In addition, two sites were taken forward as LWSs via the county-wide selection process.

Table 3.3 - Recent updates to ecological network of local sites in city

Site name	Result of review process
Mileway Gardens	Previously proposed OCWS – Designation confirmed
Churchill Hospital Field	Previously proposed OCWS – Designation confirmed
University Parks	Previously proposed OCWS – Designation confirmed
Stansfeld Study Centre	Previously proposed OCWS – Designation confirmed
Burgess Field	New OCWS designation confirmed
Dunstan Park	New OCWS designation confirmed
CS Lewis Reserve	New OCWS designation confirmed
Showman's Field	New LWS designation confirmed
Marston Brook Meadow	New LWS designation confirmed

- 3.18 Beyond these formally designated sites within the city, there are also many of types of habitats which have been formally identified as being of importance in other ways. This includes Priority Habitats under Section 41 of the Natural Environment and Rural Communities Act 2006, many of which are included within Conservation Target Areas that were identified as part of work on Oxfordshire's Biodiversity Action Plan (BAP) for being the most important areas for wildlife conservation in Oxfordshire and where targeted conservation action will have the greatest benefit. It should be noted that the expectation is that the mapping of the Local Nature Recovery Strategy will subsume and replace the previous Conservation Target Areas.
- 3.19 There are also areas of irreplaceable habitat in the city, which are afforded significant protection through national planning policy. These types of habitat include several areas of ancient woodland, including at Brasenose Wood and at Shotover Country Park which straddles the boundary of the city to the east, as well as areas of lowland fen habitat such as can be found in the Lye Valley SSSI.
- 3.20 The various types of habitat discussed above are important for supporting a range of wildlife species, many of which are under direct threat from pressures like habitat loss, climate change and pollution. The city has records of a variety of notable species, again as identified under Section 41 of the Natural Environment and Rural Communities Act 2006 referenced above. Species that are present in Oxford and that are protected under the Act include, but are not limited to: Hedgehogs, Water voles, Dormice, Swifts and Slow worms.

- 3.21 It is not only the natural environment which supports some of these different types of wildlife either. There are certain species present in the city which have come to rely upon elements of the built environment to support their life cycle. For example, urban birds like swifts which return to the UK every spring to breed and raise young and that have experienced significant declines. Swifts have come to rely on buildings for nesting and will often return to the same nest site each year so the re-development and demolition of buildings, and loss of old nest sites can have further negative impacts. The development process can support the species through careful design and inclusion of artificial roosting features.

4. Likely trends without a new Local Plan (supporting Task A2 and A3 of Sustainability Appraisal)

Green infrastructure

- 4.1 The currently adopted Local Plan 2036 will maintain protection of the network of green infrastructure across the city, alongside national policy (which affords its own strict protections for open space). Other legislation outside of planning that protects certain green spaces like allotments, as highlighted in section 2, will also continue to apply.
- 4.2 Nevertheless, a growing population means that there is likely to be increasing demand for outdoor sports provision and public open spaces in the long term. Ongoing development pressure as the city grows means that these spaces will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this can lead to a deterioration of these spaces. The quality of existing spaces already varies across the city, without additional investment, facilities associated with some green spaces may deteriorate further, exacerbating this uneven distribution in quality.
- 4.3 Different types of green spaces could face different challenges. In areas of the city where access to private gardens is reduced, there is likely to be particular demand on public spaces like parks and smaller amenity green areas for people to socialise and undertake physical activity, as well as allotments (many of which already have waiting lists).
- 4.4 Some types of GI will continue to be protected from inappropriate development through other mechanisms outside of the Local Plan, for example some trees benefit from Tree Preservation Orders (TPOs) and conservation area protection. Formal allotments benefit from protection that can only be removed via application to the secretary of state. Some of our parks and gardens benefit from heritage protection as Registered Parks and Gardens.
- 4.5 Blue spaces like the rivers and streams are already facing pressures from pollution as well as historic development of their banks. It is likely water quality issues relating to sewage pollution will continue without additional investment from Thames Water into the Wastewater Treatment Works, although with sufficient upgrades as are proposed, these

issues could then improve. Other sources of pollution that are not within the control of the Local Plan are likely to continue without separate actions in the relevant areas such as changes to agricultural practices. Without a new Local Plan there could be additional pressure for developing on open spaces along embankments, particularly beyond 2036, which could have impacts on the water courses and exacerbate the challenges they face.

- 4.6 Climate change is also likely to put pressure on many green spaces, particularly ecological sites (discussed further below). Increases in summer temperatures, milder winters, changes in rainfall distribution and seasonality, and more extremes of weather are anticipated long term impacts of climate change. The effects of these changes are uncertain and may occur as sudden and unexpected step changes. Potentially they could result in the need for additional management measures (e.g. to address risk from wildfires during drought seasons), or make spaces unusable due to additional flooding throughout the year. Indirectly, adaptation actions by other sectors that are key to land and water management may force changes in how certain spaces are utilised (e.g. to secure additional land for flood relief).

Biodiversity

- 4.7 Again, the currently adopted Local Plan 2036 will maintain protection of ecological sites within the city (via LP2036 policy G2). The Local Plan 2036 sets out that development that results in a net loss of sites and species of ecological value will not be permitted and includes specific details of protection/mitigation required for the SAC, SSSIs and Local sites. Alongside this, protection exists within national policy, such as affording protection to nationally designated sites as well as protections more generally to open space.
- 4.8 The requirement of 5% net gain in biodiversity in Local Plan 2036 policy G2 for all major developments proposed on greenfield sites or brownfield sites that have become vegetated has already been superseded by the 10% requirement of the Environment Act. With the mandatory 10% biodiversity net gain being set as a condition unrelated to the Local Plan and with the expectation being that the associated habitat is secured for at least 30 years, there is potential that biodiversity could receive increasing support going forwards without a new Local Plan, however, opportunities for this net gain to be delivered within the city are likely to be limited. The county's Local Nature Recovery Strategy (LNRS) will identify opportunity areas for enhancement actions to improve biodiversity in due course, however, the LNRS cannot force enhancements nor assign additional protection, thus these opportunities will rely on willing landowners and sufficient sources of funding, thus their benefit for biodiversity is not certain.
- 4.9 The GI study 2022 noted the unequal distribution of certain types of green space and this is likely to remain the case in the absence of the new Local Plan – and this would include more nature rich spaces. The constrained nature of the city means that opportunities for creation of significant new green spaces within the denser urban areas will remain limited and smaller-scale enhancement are likely to be more forthcoming where resource and changes to management practices are forthcoming.

- 4.10 The same challenges of climate change as noted above will apply to biodiversity too such as by making ecological sites less suitable for the species that rely on them or driving changes in species distribution as they move to better suited climates. It could also lead to influxes of invasive species that are better suited to the new climate. Generally, it has been suggested that in the longer term, there is a significant risk of direct impacts on priority habitats. Equally, pressures on watercourses impacting ecological conditions will likely continue without various interventions such as upgrades to key wastewater infrastructure as are noted in the green infrastructure section.

5. Options for Local Plan 2042

- 5.1 The analysis set out in the previous sections of this background paper indicates the need for the Local Plan 2042 to include policies that will ensure that Oxford is a city with an extensive green and blue infrastructure network, a good level of biodiversity and with resilience and adaptability in the face of climate change.
- 5.2 The Plan will therefore include policies that address the following topic areas:
- the protection and enhancement of the city's green infrastructure network,
 - securing gains in biodiversity, and
 - enhancement of the resilience and adaptability of the city to climate change.
- 5.3 For each topic, options for the approach that could be taken for the Local Plan 2042 policy have been considered, and these 'options sets' are set out in tables on the following pages. The tables identify potential positives of the approach, as well as the potential negative or neutral impacts that could arise depending on the approach taken and that have helped inform the preferred position set out for the Regulation 18 consultation.
- 5.4 Additionally, the options sets have been considered in light of their specific sustainability impacts through a high-level screening against the 12 sustainability criteria forming the assessment process for the separate Local Plan Sustainability Appraisal (explained in greater detail in the main Sustainability Appraisal report).
- 5.5 Where there is potential for a significant sustainability impact to arise from an option, or where there are significant differences in impacts between potential options, the Council has screened the options set in for a detailed appraisal in the main Sustainability Appraisal report. A summary of this screening process is included at the end of each options set table.

Policy options set 005a (draft Policy G1): Protection of GI network and green features

- 5.6 The proposed options set out to protect a network of different open spaces. The options consider the protection of the open space network in a couple of ways, either assigning similar protection to all sites, or identifying a hierarchy of sites with different levels of protection. The options seek to protect the network through one policy, rather than having bespoke policies for each type of space in the network, but there is an option which considers whether additional policies could be applied to different types of spaces. There is also an option for protecting trees, hedgerows and woodland.

Table 5.1 - Policy options set 005a: Protection of GI network and green features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Identify a network of green and blue infrastructure for protection, informed by the green infrastructure study. Incorporate multi-functional green spaces of varying sizes, with clear criteria for inclusion in the network. All spaces in the network would be treated with equal protection, based on presumption against any net loss (because being a part of a network means that it would be challenging for them to be replaced elsewhere).	Ensuring that we are protecting a network of spaces and features at various scales will help to ensure that the needs of local residents and the environment are met at various levels. Ensuring spaces are connected, and protected from further fragmentation, can help support quality of these areas and wider nature recovery. The city is limited in its green infrastructure, particularly open space. Once open space is lost, it can be very difficult to reprovide. Beginning from a	The green infrastructure study has identified that some green spaces and features are of a higher quality than others – performing a more important role in supporting the city than others. Considering the high demands for space in the city in order to meet other objectives, such as providing affordable, quality housing for residents, it may be preferable to protect only the higher quality, strategic spaces, or those with practical opportunities to enhance. This would allow us to release poorer quality spaces for other needs, rather than treat all spaces with the same degree of importance. Careful wording will be needed to ensure this approach clearly fits in with the NPPF wording that protects all green spaces unless they are shown to be surplus or can be re provided.

	standpoint that all spaces are valuable and should be protected in themselves helps to recognise this challenge. Protecting open space regardless of quality recognises that every space has the potential to make an important contribution to health and wellbeing as well as wider sustainability, particularly to the local area.	
Option b Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in exceptional circumstances, to permitting development with reversion of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy.	Gives further clarity than option a, and provides opportunity to identify higher quality, strategic and multifunctional sites and prioritise these for protection over sites that have less adverse impact if lost to development.	Categorising sites may be subjective exercise and run risk of deprioritising spaces that may still bring about benefits.
Option c In addition to the network, have a series of separate	This option could allow bespoke policy approaches to specific types of green space	This approach may add a level of confusion where there are protections of a particular category both within and outside of the network (for example some

policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecological sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.	and any unique needs/concerns.	outdoor sports pitches may be a multifunctional part of the network and others may have protection only as outdoor sports).
Option d Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover.	Trees perform several important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of established trees and to incorporate the planting of new trees. Tree canopy cover often has the biggest impact on setting and as such that correlates to the benefits that trees can bring. Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the City Council having been	Where high quality trees are already protected by Tree Preservation Orders, additional tree protections could be considered too onerous in the development of particularly constrained sites.

Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.	made aware of them and designating in this way. It is unlikely that all high-quality trees in the city are protected in this way however, thus many will not benefit from TPO protection.	
Option e Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.	This option recognises that there are key areas of open space with value to supporting health and wellbeing in the city. These larger spaces are likely to have more capacity for enhancement than smaller ones too. It would ensure that key areas are identified and protected across the city whilst diverting development pressure away to poorer quality areas or areas that provide less benefit overall.	Green infrastructure works best when thought of as an interconnected network, which this approach would ignore. Smaller spaces and linear features contribute to and enhance larger spaces, as well having an equally important role in supporting day-to-day wellbeing – breaking up urban environment, supporting climate resilience, creating wildlife corridors and encouraging active travel.
Option f Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.	National guidance on GI standards is developing, including the full launch of the Natural England GI Framework later in 2022.	Relying on national standards for green infrastructure provision could risk ignoring local contextual issue and priorities which a local policy can help to address.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Various options or combinations e.g. option A or B, A+C, B+C, A+B+C, A+B+C+D, A+D, B+D, E, F)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, **7. Green Infrastructure**, and to **10. Biodiversity**. There is also some relevance to criterion **3. Efficient use of land**, as the use of designations and protections that restrict development on greenfield land.

All options are going to score positives for criteria 2, 3, 7 and 10, apart from option g (no policy – defer to national policy/standards) which would score neutral. All other options seek to put in place some form of baseline level of protection on all green spaces, creating designations dependent on the function or type of green space, and restrictions. The differences between the policies are of degree and extent. The extent of the positive impact of these options will depend largely on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005b (draft policy G2): Enhancement and provision of new GI features

- 5.7 Green features on sites can be designed in ways that allow them to perform multiple benefits for the local area, e.g. making space for biodiversity, recreation, climate resilience. The policy options in this set consider how opportunities can be maximised for delivering new and improved green infrastructure and securing the various benefits associated with it, whilst cumulatively bringing about a greener and healthier city. They also consider options for securing new open space, though opportunities for this will likely be limited to larger sites.

Table 5.2 - Policy options set 005b: Provision of new GI features

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Require green and blue infrastructure features on all new development – guide expectations through tailored requirements in different areas of city or on different scales of site including: i. Compliance with Urban Greening Factor to demonstrate net gain ii. % new open space on larger sites iii. Bespoke guidance on greening within allocations policies.	More bespoke tools would align with the wider spatial approach to the Local Plan and such tools/approaches could be tailored to meet specific needs/challenges in different areas of the city (e.g. areas of deficit, deprivation, with poor air quality, highly urbanised sites). National policy encourages use of such tools as a standard. Such tools can allow for better analysis and more effective design of green infrastructure, assist in practical delivery and better quantification of benefits. With better quantification of green infrastructure, comes the potential for better monitoring of what is being	Quantifying green infrastructure provision and its benefits can be a subjective process which is not an exact science. There is the potential for any provision of green infrastructure by applicants to be tailored to meet only the bare minimum as required by any such policy (e.g. the minimum acceptable to meet policy), rather than striving to maximise provision or be more innovative. Potential for more complicated/onerous development management process which would need to be addressed with quality guidance.

	delivered in a design proposal.	
Option b Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features. Set out principles for what should be included. Leave requirements flexible, to respond to the site's specifics.	Larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city – ensuring these are captured with a requirement for a specific level of open space helps to contribute to new open space provision. Smaller sites in the city are typically more limited in what green infrastructure features they can provide, as such, requiring new provision to be factored into their design, but leaving flexibility in how this achieved, would allow for different proposals to respond in the best way possible for the site. Requiring open space provision on smaller sites could lead to small, unusable spaces that are costly to manage and maintain and offer little value to residents,	Many developments in the city have historically been on smaller sites and not of the scale large enough to meet the need for open space provision on larger sites. Asking for green infrastructure, without specifying more exact/quantifiable targets risks under provision and proposals not maximising the potential for green infrastructure on a site. In relation to smaller sites and requiring green infrastructure without setting more exact targets, historically, it has been difficult to monitor and therefore assess the performance of similar policies.

	as has historically been experienced in the city.	
Option c Set out a specific quantity standard of the number of hectares per 1,000 population for green space provision on all new developments in city	This would provide a simple target to monitor and report on.	Such a target would not necessarily be meaningful as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. It is more meaningful to measure and provide greenspaces on a more localised basis. Work on the Local Plan 2036 identified the challenge that it is increasingly difficult to manage the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites.
Option d Do not include a policy for providing new green infrastructure, defer to national policy/standards.	This would allow for greatest flexibility for applicants to work within the constraints of their site.	This option would be limited in influencing the amounts of greening undertaken on a site and would not set any minimum expectations on proposals. It could result in opportunities to maximise green infrastructure being missed and is likely to have less of a positive influence on the design of natural elements of designs.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B, A+B, C, D) High-level screening conclusion? the options are similar to each other from a sustainability perspective. Screened in for detailed appraisal? No Rationale: In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion 2. Resilience to climate change, and 7. Green Infrastructure. There is also some relevance to criterion 10. Biodiversity. All options are going to score positives for criteria 2, 7 and 10. because they seek to bring in additional greening as part of new development, apart from option g (no policy – defer to national policy/standards) which would score neutral. The differences between the policies relate to how the additional greening is delivered and how the amount is determined. The

extent of the positive impact of these options will be dependent on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005c (draft policy G3): Provision of new GI features – Urban Greening Factor

- 5.8 At its most basic, the Urban Greening Factor (UGF) is a policy tool that provides a way of simply quantifying green surface cover on a given development site via a metric system. UGF schemes have been applied in several cities through planning policy including the London Plan and the Southampton Local Plan. The methodology is also one of the Headline Standards that form the basis of the Natural England Green Infrastructure Framework.
- 5.9 The UGF can be used to quantify in simple terms the amount of green infrastructure being proposed as part of a development scheme. Policies that incorporate the UGF can require proposals to secure a certain target, or to simply demonstrate a betterment in score compared with the existing site. The use of the UGF is intended to achieve separate objectives to biodiversity net gain, though it will be mutually supportive. Instead, the key intent of the UGF is to help address a variety of wider place-making and environmental issues, for example, making spaces that are more pleasant for people, as well as delivering resilience/adaptation to climate change (more green infrastructure can improve flood resilience and reduce urban heat).
- 5.10 Requiring applicants to use an UGF could be a useful way of improving the way that green infrastructure provision on sites is quantified. The policy options below set out possible approaches for applying the tool in the Oxford context and have been developed with consideration of the strengths and weaknesses of the methodology.

Table 5.3 - Policy options set 005c: Provision of new GI features – Urban Greening Factor

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring	Would allow for greening on sites to be quantified and seeking a betterment should	The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures.

proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development	help to green the city over time. UGF tools are quick and simple to use and to be understood by a range of users, they can assist in discussing and visualising levels of greening on a site. Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.	Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc. as with any other application. They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric. The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, but it would be an additional ask of applicants.
Option b The scale of application of the UGF tool could be across select sites/ areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be: • Major applications • Specific site allocations which are not already sufficiently green. • Retail/district centres • Areas of deficit of green surface cover and/or heightened climate risk.	This avoids unnecessary work by avoiding areas that are already particularly green. It is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.	Could be missing out on opportunities to promote greening elsewhere in the city – encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.

Option c Incorporate the use of an Urban Greening Factor (UGF) into policy with bespoke higher scoring for areas of the city identified as a priority greening area - determined by the level of deficit of green surface cover and/or heightened climate risk.	This can secure targeted betterment in areas where there is a clear deficit of green space and potentially reducing the greening requirement on developers for schemes in areas that are already particular green.	Oxford is highly constrained and has a high level of density in some areas. Desktop assessment already indicates what is likely to be an achievable threshold of UGF score, which is lower than the NE baseline. Development sites tend to be fairly small and compact particularly in dense areas where there is deficiency in green space. Achieving higher bespoke scores in areas where there is already deficiency will be difficult and potentially unviable – testing
Option d The scale of application of the UGF tool could be mandatory across all developments in the city.	The ease of use of the tool and the non-prescriptive requirement of simply achieving betterment (leaving a site greener than it started) could be quite easily applied to many areas.	Some sites in the city are already quite green and achieving betterment could be difficult to achieve/of little value. The tool is better suited to harder, grey areas with little greening at present. The tool does not distinguish between quality/condition in detail, therefore, there is a risk that on particular green sites, the policy requirement could promote replacement of existing established/quality features for other poorer quality features.
Option e Do not incorporate an UGF into policy	The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, however, it is an additional ask of applicants.	The tool is a simple and practical way of quantifying and better negotiating net gains in greening on sites which has a range of benefits including climate adaptation, mental and physical health and wellbeing and biodiversity.

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? various options (A, A+B, A+C, A+D, E)

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale:

The options relate to whether or not to include policy requirement for undertaking an urban greening factor assessment (option a) or not (option e), as well as various options for the scale of application to which such a requirement would be applied (options b, c and d).

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **7. Green Infrastructure**, and to **criteria 5. Inequalities** (some of the options address greening in areas that are below average for green infrastructure currently). All options are going to score a minor positive for criteria 7. because they seek to bring in additional greening as part of new development, apart from option e (no policy) which would score neutral. Option b and c seek to prioritise greening in areas which are lacking, (the difference is just which areas) so would also score a minor positive for inequalities. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Policy options set 005d (draft policy G4): Delivering mandatory net gains in biodiversity

- 5.11 There is a national mandatory requirement for providing 10% Biodiversity Net Gain (BNG) as part of planning applications (subject to some exceptions in the legislation). Applicants are incentivised through the DEFRA biodiversity metric (used to calculate net gain) to provide this onsite or in areas identified within an appropriate strategy, but are able to find other offsite options where necessary.
- 5.12 The constrained nature of many sites in the city means that BNG may need to be provided offsite in many instances even if kept to the national minimum target, going higher than this may have impacts in terms of what other features can be provided onsite, or result in more BNG having to go offsite. Where offsite delivery is necessary, the Local Plan can play an important role in steering where this should go. The Local Nature Recovery Strategy is emerging at present and identifies opportunity areas where enhancements for biodiversity could be particularly valuable, meanwhile, in advance of that, Conservation Target Areas and previous Nature Recovery Network mapping can help steer net gain to suitable areas. The options considered relate particularly to how offsite delivery should be guided, but also whether higher BNG targets should be incorporated.

Table 5.4 - Policy options set 005d: Delivering mandatory net gains in biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Set out a hierarchy for how 10% net gain as required through Environment Act should be delivered, particularly where on-site net gain is not possible. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas) in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.	The approach is in line with national expectations for net gain in biodiversity and would allow more flexibility to secure other types of benefits for sites too e.g. other types of onsite features not addressed by the BNG metric (as is the topic of option set G5). The national guidance, and the BNG metric, are not as prescriptive about where off-site gains should be delivered, so this approach would provide some local steer about the Council's priorities. This policy would help to ensure that any off-site delivery of net gain would be to the benefit of the local area in first instance before options further afield are considered.	There is an element of repetition of the national BNG legislation here which may not be necessary. The city has limited capacity for taking on additional biodiversity enhancement to the scale and specific standards required through the Environment Act/DEFRA metric. As such, whilst a policy could try to focus any off-site delivery in the local area, geographical constraints may limit its effectiveness and options further afield, even beyond the boundary, may be necessary regardless. Off-site delivery may actually deliver better outcomes for biodiversity if geared towards landscape-scale nature conservation. From a net gain perspective, it may be less effective forcing constricting delivery to local areas first (particularly onsite).

Option b Require higher than 10% net gain, in excess of the minimum requirements of the Environment Act (but subject to same exemptions as apply to national 10% requirement). Set out hierarchy for where this should be delivered if on-site not possible. Guidance would seek to secure off-site delivery in the local neighbourhood in first instance, then within city boundary, then county. Off-site delivery at each of these scales would be guided to the opportunity areas of the forthcoming Local Nature Recovery Strategy in the first instance, (or the Oxfordshire Nature Recovery Network and/or Conservation Target Areas in advance of the LNRS publication). Payment into the national statutory BNG credit scheme as last resort only.	Recognises the importance of supporting biodiversity and acting on biodiversity decline nationally by setting a standard higher than the nationally imposed minimum.	10% net gain on sites as required by Environment Act is likely to be challenging enough in many areas of city. A higher target is not considered realistic/deliverable particularly on many smaller, constrained sites and could result in more off-site mitigation, as opposed to on-site measures. This off-site mitigation is unlikely to all be within the city, but instead via contributions to schemes across the wider county. There are other measures that can support biodiversity which are not recognised by the DEFRA metric and that would not be boosted under this option. Eng. wildlife friendly features like bird boxes, insect hotels, hedgehog highways etc. Additional demands in terms of net gain could impact ability/viability to provide for other needs. The additional cost of this will affect the affordability and therefore selection of other policy approaches that are equally important.
Option c Do not include a policy addressing biodiversity net	Environment Act is a landmark piece of legislation which will already result in an	The national requirements in the Environment Act are not informed by local context. Many sites in the city are constrained in nature without the space to provide for new

gain requirements as set out in Environment Act, defer to national guidance/policy.	increased focus on delivering for biodiversity on all new developments. It may be that this is brought into the NPPF at a national policy level instead.	habitat on site, thus having to rely on off-site delivery elsewhere in city (and, as last resort, beyond city). Could result in limited benefit to local area.
---	--	--

Initial sustainability appraisal screening of options sets

Is there only one option or are there various options we could take? Either option a, b or c (they are alternatives to each other).

High-level screening conclusion? the options are similar to each other from a sustainability perspective

Screened in for detailed appraisal? No

Rationale: The options relate to whether the Local Plan should include policy guidance setting out the Council's preference for how offsite biodiversity net gain should be provided, guiding this to the local area and the opportunities identified in the LNRS, before looking more widely (option a and b) or not to set any local guidance. Option b also weighs up an approach of requiring more than 10% biodiversity net gain.

In terms of sustainability impacts, the options most directly relate to **criterion 10. Biodiversity**. Options a and b are likely to have minor positive impacts for the criteria, though in practice they do not exceed national standards particularly and are principally focussed on articulating how the Council would wish to see BNG implemented in the city. Option a and b would both seek to try to ensure that even if biodiversity net gain cannot be delivered onsite, it would be guided to local areas in the city (particularly those that are also identified as opportunities in the LNRS), potentially reducing the risks that this would otherwise be provided much further afield and to minimal benefit to local biodiversity. Option b might result in more positive impacts because it would seek to secure higher proportions of BNG than the national 10% target, however, larger targets are less likely to be able to be accommodated on many of Oxford's constrained sites and would also likely reduce the pool of local offsite opportunities that could accommodate this where it is not able to be met onsite (meaning it may go further afield) - thus the benefit is likely to depend on implementation. Option c would still likely result in minor positive impacts, because of the national target of 10% BNG which would still apply to all applicable planning permissions, which is likely to result in positive improvements over time even without the benefit of local policy specifying the Council's preferences for how BNG should be

implemented. Overall, the sustainability impacts are unlikely to vary significantly between the options and it is not considered necessary to scope these in for further detailed appraisal.

Policy options set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

- 5.13 Whilst the national mandatory Biodiversity Net Gain (BNG) targets for planning applications promote habitat creation to support biodiversity, there are other needs for supporting species that are not recognised as part of the Environment Act's net gain requirements but that can still be highly beneficial. For example, the ways we design the urban environment can either support or hinder movement of species between habitats, meanwhile, certain species such as swifts and bats have adapted to rely on elements of the built environment for shelter where these spaces are designed in the right way. Habitat creation to satisfy BNG may also not always be able to be delivered onsite and so it is important to seek to secure other types of enhancements to support biodiversity too.
- 5.14 The options considered in the below table address the ways that the Local Plan can support biodiversity in other ways beyond BNG. They range from more prescriptive requirements that still retain some flexibility to meet needs of particular sites, to less prescriptive requirements or having no policy at all.

Table 5.5 - Policy options set 005e: Protecting and enhancing onsite biodiversity

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Policy with prescriptive requirements to secure biodiversity features on site. Could require a specific number of enhancements on each site selecting from a pre-defined	Highlights on-site biodiversity measures as a priority for the Local Plan/Oxford City Council. Policy could be tailored to challenges of delivering biodiversity net gain in a constrained city like Oxford. Would primarily seek to secure some sort of onsite	Every site is likely to be different, risk that a prescriptive list/point system could be too blunt a tool, limiting any benefits. On more constrained sites, the scope for biodiversity enhancements will still be challenging.

'biodiversity points list' (e.g. bat box, bird box, wildflowers). • Points could be broken down into several pots/categories. • Potentially different points targets for householder, minors and majors applications. Could potentially be supported by updated Technical Advice Note (TAN).	improvement and support/fill in gaps left by Environment Act which may result in off-site compensation for on-site impacts. More specific targets (e.g. through point system) would be more practical to monitor and implement. A pre-defined list would provide guidance to applicants about what is most suitable for their site/location.	
Option b Policy that requires biodiversity features/ecological measures but is not prescriptive about what measures are incorporated/or how much/or the standard of those measures. Could potentially be supported by updated TAN.	Highlights on site biodiversity measures as a priority for the Local Plan/Oxford City Council. Allows more flexibility than Option b for developers to work within the constraints of a site.	Less prescriptive policy and lack of quantifiable targets for what measures are expected could result in less effective policy and less influence on what comes forward. Without a minimum target, proposals may be more likely to fail at maximising opportunities on a site.
Option c No bespoke policy on supporting biodiversity on	Constrained city means achievable measures could have limited effect anyway,	The Environment Act requirements likely to have issues with achieving onsite net gain in many parts of city, resulting in off-site contributions, exemptions also, meaning net gain in real

site, instead, via complimentary policies (e.g. sustainable design and construction), include requirements to incorporate general ecological enhancements.	protection of established ecological sites nearby may be more effective overall.	terms could be limited. A specific policy would highlight this as a priority for the City Council, not including one could weaken this position. General encouragement of ecological enhancements means effectiveness of policy is harder to quantify and monitor.
Option d Do not include a policy for protecting and enhancing on site biodiversity, defer to national policy/standards.	Environment Act is a landmark piece of legislation which will already result in an increased focus on delivering for biodiversity on all new developments.	Environment Act 10% net gain is focused primarily on habitat creation which equates to habitat units and will have limited benefits for addressing wider needs of many species present in Oxford. Many sites in the city are constrained in nature without the space to provide for new habitat on site, thus having to rely on offsite delivery elsewhere in city (and, as last resort, beyond the city). Could result in limited benefit to local area and lead to ecological impoverishment.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Either option a, b, c or d High-level screening conclusion? the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: The options presented set out alternative approaches for the Local Plan to address provision for onsite biodiversity beyond what is expected as part of the Environment Act 10% net gain requirements and could be treated as standalone alternatives to each other. Options a, b and c set out different ways that additional biodiversity enhancements could be secured through policy. Option d would mean no local policy requirements. In terms of sustainability impacts, the options all most directly address SA criterion 10. Biodiversity, whilst some of the enhancements that might be secured under the options could support criterion 7. green infrastructure, this would depend on implementation (some biodiversity enhancements could instead take the form of other features like bird boxes, swift bricks,

etc), so it is difficult to assess impacts. For criterion 10. Options a, b and c are all expected to have some varying level of minor positive impact, with more prescriptive requirements of options a and b likely to have a slightly more positive impact than option c, which has the potential to be a less effective approach. Option d is likely to have a neutral or minor negative impact for criterion 10. Whilst the net gain requirements of the Environment Act are likely to ensure key habitat features are identified on a site and a net gain of 10% biodiversity secured, this does not have to be onsite and could be provided for off-site and potentially outside of the city. Equally, the BNG process is focussed on habitat and may not fully address impacts on particular species onsite or in the surrounding area, meaning there is potential for new development to have harmful impacts if these are not mitigated through other mechanisms. Under criterion 7. Whilst this is dependent on implementation, options a, b and c could result in minor positive impacts where enhancements are in the form of greening and habitat creation measures, meanwhile option d would likely be neutral. Other than option d, the options for this policy are about securing additional benefit for biodiversity from development, and the impacts for sustainability are similar and not considered significant enough, regardless of option, to warrant detailed appraisal.

Policy options set 005f (draft policy G6): Protecting Oxford's ecological network

- 5.15 There is a range of sensitive species and habitats across the city which need to be considered in the development process. Onsite, there may be features already present that need to be investigated and appropriately addressed through the design process in order to mitigate impacts. Additionally, there are a range of designated sites across the city of varying national/local significance, and whilst the nationally important sites benefit from high levels of protection through national policy, the locally valuable sites rely on Local Plan policies for their protection. The sites have varying characteristics and can be sensitive to different types of impacts from developments which applicants would need to consider.
- 5.16 The options set below includes options for addressing onsite biodiversity through the development process, as well as options for how to protect the wider ecological network across the city. These national and local designated sites would also be identified within the green infrastructure network (the subject of draft policy G1), and as such these options would set out additional considerations for development that could impact these particular sites in relation to their special biodiversity functions.

Table 5.6 - Policy options set 005f: Protecting Oxford's ecological network

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Include policy requirements that seek to ensure applicants identify/assess/protect any existing habitat of value on a site.	There are often habitat/features/species that exist outside of designated sites in the city which are valuable and need to be protected where possible. Ensures developers assess potential impacts on legally protected species.	This would involve additional checks and assessment for applicants before commencing work.
Option b Include a policy which protects the city's network of national and local designated sites from development. Define hierarchy within the network, with level of protection based upon importance/value of species/habitat they have been designated for such as: • International designations (SAC) • National designations (SSSIs) • Local sites like Local Wildlife Sites and	Ensures that the city's most important areas of habitat and species are protected from the direct and indirect impacts of inappropriate development in future. Also ensures that the level of protection is proportionate to the level of ecological interest. Protection of SACs, SSSIs and irreplaceable habitats set out in legislation/NPPF. No specific protection for locally designated sites, although the NPPF requires local plans to identify, map and safeguard such sites.	Protecting designated habitats is important for supporting biodiversity in the city, however, there are likely to be other smaller/undesignated habitats which provide an important supporting/connecting role which will need to be safeguarded where possible also. Space in the city is under demand to deliver upon a variety of objectives, including providing for affordable/quality housing and jobs – these needs must be balanced with the need for protecting biodiversity, but will necessarily be limited as space is secured for other purposes like this.

Oxford City Wildlife sites. • Priority habitat. Reiterate national guidance for how to deal with irreplaceable habitats.	Also acknowledges that there is differentiation in local designations where Oxford has multiple tiers of locally designated sites; notably, more stringent criteria area applied in designating local wildlife sites (LWS) versus Oxford City Wildlife Sites (OCWS). Also ensures protection of sites/habitats that are of notable ecological value but not previously identified through selection of designated sites.	
Option c Set out that proposals will need to consider a range of potential impacts depending on the context of application and proximity to any protected site(s), particularly, but not limited to: • Loss of protected land • Recreational impacts • Changes to the hydrological regime	Recognises that there are different characteristics/qualities for which sites are designated and these are at risk from different impact mechanisms arising from development. For example, some sites in the city, such as the SAC and Lye Valley SSSI are particularly at risk from changes to hydrological regime (e.g. changes to groundwater flows and pollution impacting water	Whilst the approach would flag the range of considerations that applicants may need to consider and address in an application, the level of information needed to assess and justify no impact will vary depending on the level of protection on a site and type of application (e.g. likely a higher burden of information needed where proposal impacts a site protected through national legislation). Would be challenging to provide detailed steer on this at Local Plan policy level, and the level of assessment would need to be determined by the applicant through reference to the appropriate information.

(groundwater, primarily), • Impacts on water quality • Impacts from air pollution.	quality). Others are at risk from other pressures. Provides a hook in policy from which to develop additional helpful guidance, potentially tailored to particular locations or types of sites (e.g. Technical Advice Notes) that can provide further detail for area specific requirements/considerations - - e.g. where applications impact a particular designated site.	
Option d Include separate policies focussed on specific sensitive areas in the city, e.g. in proximity to the Lye Valley, or the SAC, with bespoke requirements focussed on particular risks (e.g. changes to groundwater flows).	Particular considerations tailored to the specific risks to these areas could be set out clearly for development coming forward nearby.	There is a network of ecological sites in the city and varying levels of national/local significance and Focussing policy on particular risks to the areas might reduce the ability to look at wider impacts from development as a whole. There may be other adverse effects that particular developments may need to consider. There are other ways to provide more specific guidance on particular locations, e.g. Technical Advice Notes, which can be kept updated more regularly throughout the Local Plan's lifetime.
Option e Do not include a policy protecting biodiversity including ecological sites.	There is already legislation and national policy governing the upper levels of the hierarchy so may not be	Particularly for local sites of ecological importance, the Local Plan is the key means through which these designations are protected from inappropriate development.

Instead, defer to national policy/standards.	necessary to repeat that locally.	
--	-----------------------------------	--

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various combinations e.g. option a, a+b, a+b+c, a+c, d High-level screening conclusion? the options are unlikely to have significant sustainability impacts Screened in for detailed appraisal? No Rationale: If not taking forward option e (no local policy), it is likely a combination of options that include option a would be taken forward. Option a sets out requirements for identifying what is already on a site and responding accordingly. The additional options presented are either to include a policy protecting a hierarchy of ecological sites, including those of national/international importance and those of local importance (option b), or to have more specific policies focused on particular areas (option d). Option c isn't an alternative, but rather an additional element that could be incorporated into option b which would set out additional guidance/expectations for proposals to consider a range of impacts that could cause harm to these sites. In sustainability impacts arising from the options, these would most directly relate to SA criterion 10. Biodiversity. Whilst option a is likely to have a neutral impact, as it is about identifying the biodiversity features present on a site and mitigating any impacts from development, Options b and c would have minor positives for this criterion by helping to ensure that existing biodiversity onsite is identified/protected and that the most valuable sites in the city for ecology would be protected from harmful development, particularly the locally important sites that do not benefit from the same levels of protection in national legislation as the SAC and SSSIs (option c would just provide further detail about implementation in relation to dealing with adverse impacts). Option d would be similar, but more focussed to particular locations and would thus depend on implementation (which locations). Option e is likely to have neutral impacts in relation to the national sites (because they are already strongly protected at national level), however, there would potentially be minor negative impacts in relation to the local sites not protected in the same way through national policy.

Overall, the sustainability impacts of the options are principally focussed on mitigating impacts from development and protecting what is already there, so they are unlikely to differ significantly enough from each other to warrant detailed sustainability appraisal.

6. Conclusions including key sustainability issues

- 6.1 Oxford's green infrastructure network is a multi-faceted resource that brings multiple social, environmental and economic benefits to the sustainability of the city. One key component of the network is the hierarchy of ecological sites, some of which are of national importance, whilst others are of local importance, which are designated for their value to nature. Its protection and enhancement will be an important issue for the new Local Plan, as will avoiding and mitigating any impacts on Oxford's flora and fauna whilst also enabling net gains in biodiversity in line with the objective of the Environment Act. There are likely to be a variety of measures that can be explored going forwards to contribute to these goals.

Key sustainability issues for the Local Plan to address:

- Green infrastructure, and particularly tree cover, is lacking in some of the city's most deprived wards.
- Unequal access to, and distribution of, high quality green infrastructure across the city exacerbates wider health inequalities but also mean that there are likely priority areas which would benefit particularly from increased greening.
- Increased recreational pressure as a result of new development generating additional residents/visitors in area puts pressure on GI and 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.
- 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.
- Infill development within the city, particularly on garden land, can impact upon some informal/supporting habitat for wildlife within these spaces.
- Climate change is likely to impact habitats and species distribution, it may also impact upon the functionality of open spaces in the city (e.g. during flooding).
- Air pollution from increased vehicle movements impacts sensitive sites in locality.
- There is likely to be an increased need for sites for off-site biodiversity net gain stemming from development nearby (Environment Bill).
- Water quality impacts from new development as well as ongoing pressures from existing development, such as wastewater discharge related pollution and run-off from roads etc. can negatively affect biodiversity.

Preferred approaches for the Local Plan 2042

- 6.2 Section 5 identifies a number of topics that the Local Plan 2042 could implement policy to address which relate to the provision of green infrastructure, securing biodiversity and enhancing resilience to climate change. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. Taking into account the various impacts arising from the options, the preferred approach to be taken for each topic, and set out in the main Regulation 18 consultation document, is as follows:

Protection of Green Infrastructure network and features – draft Policy G1

- 6.3 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of aspects from options **A**, **B**, **C** and **D**. This combination of options establishes the principle of a city-wide connected green infrastructure network made up of spaces and features of different scales and type, that will be subject to varying levels of protection. This approach is considered the most effective way of protecting all public and private green infrastructure in the city from inappropriate development and mitigating the impact on green spaces of development in general. Policy can establish a hierarchy of protection for all green spaces in the city, which can identify spaces that are particularly important to the city in terms of their function, historical significance or local amenity and where needed can ensure levels of protection that go beyond what is stated in national policy. This approach would allow us to set out the specific conditions under which certain types of green space may be lost to development, and measures to mitigate the impact of such losses including re-provision. The approach would also recognise importance of trees and set out expectations for developments that might impact them.

Enhancement and provision of new Green Infrastructure Features – draft Policy G2

- 6.4 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of options **A** and **B**. Policy would set out requirements for green and blue infrastructure features to be associated with new development schemes, and where there are existing GI features for these to be enhanced. The approach will allow for specific requirements for new or enhanced features as applicable to the parameters of the site and its context. Specific amounts of open space provision will only be required for large sites. The combined approach will allow for some degree of flexibility with respect to requirements depending on the parameters of the site, while ensuring that GI forms a fundamental element of development schemes coming forward.

Provision of new Green and Blue Infrastructure: Urban Greening Factor – draft Policy G3

- 6.5 The preferred approach for the Local Plan 2042 draft policy is to take forward **option B**. This option will incorporate the use of UGF into policy and the use of the tool will be encouraged for all developments, however its mandatory use will only be required for a selected category of development. This approach will enable targeting application of

the methodology to where the most benefits may be accrued, for example development types that present opportunities to secure significant betterment in green surface cover or areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.

Delivering mandatory net gains in biodiversity – draft Policy G4

- 6.6 The preferred approach is to take forward **option A**. This approach would maintain BNG requirements in line with national requirements, recognising that onsite delivery is already challenging on many constrained sites, but also that there are various other onsite enhancements that the Council is seeking to drive forward to improve the environment and provide for biodiversity alongside the 10% habitat net gain as recognised by the DEFRA metric (e.g. draft policy on urban greening G3, draft policy G5 onsite ecological enhancements). This approach would also ensure that where onsite provision cannot be achieved, offsite provision is guided towards areas that most benefit the city and wider county, particularly focusing on the Local Nature Recovery Strategy areas once adopted.

Protecting and enhancing onsite biodiversity – draft Policy G5

- 6.7 The preferred option for the draft policy is **option A** which would set prescriptive requirements for types of onsite ecological enhancements that are expected of development. This approach will help to provide clarity for applicants as to expectations and allow the Council to set out a list of features that would be most appropriate to the city's context and the needs of particular local species. Flexibility can be introduced to accommodate varying context of development sites by allowing applicants to pick a number of features from this list. The policy will complement the 10% BNG requirements and help to ensure that even where BNG cannot be delivered onsite, some provision for biodiversity is incorporated. There may be opportunities to tailor the list of features so that they complement the types of enhancements that the Local Nature Recovery Strategy identifies as opportunities within the city.

Protecting Oxford's ecological network – draft Policy G6

- 6.8 The preferred approach for the Local Plan 2042 draft policy is to take forward a combination of **options A, B and C**. Option **A** will help to ensure that development appropriately investigates and addresses any existing biodiversity on site in accordance with the mitigation hierarchy (e.g. seeking to avoid impacts before thinking about mitigating). Meanwhile options **B** and **C** mean that the Local Plan can identify and protect a the network of designated sites in the city, including locally important sites and set out the various considerations that applicants may need to take into account in order to avoid adverse effects. This should mean that applicants fully consider all the relevant information and potential impacts from their development, taking into account the varying characteristics of different sites around the city. The expectation would be that, where appropriate, additional guidance would be provided through technical advice notes which expand on the policy and help applicants to interpret its requirements, e.g. setting out how the Council expects them to avoid adverse effects in relation to particularly sensitive sites.