

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

Contents

Chapter 4 - A Green Biodiverse City that is Resilient to Climate Change	1
Contents.....	1
Headlines for Chapter 4:	2
Short Questionnaire Responses.....	3
All Public Responses – Draft Policy G1.....	4
Statutory Consultee Responses – Draft Policy G1	29
All Public Responses – Draft Policy G2.....	39
Statutory Consultee Responses – Draft Policy G2	49
All Public Responses – Draft Policy G3.....	57
Statutory Consultee Responses – Draft Policy G3	62
All public Responses – Draft policy G4.....	64
Statutory Consultee Responses – Draft Policy G4	67
All Public Responses – Draft Policy G5.....	70
Statutory Consultee Responses – Draft Policy G5	73
All Public Responses – Draft Policy G6.....	75
Statutory Consultee Responses – Draft Policy G6	91
All Public Responses – Draft Policy G7.....	97
Statutory Consultee Responses – Draft Policy G7	102
All Public Responses – Draft Policy G8.....	105
Statutory Consultee Responses – Draft Policy G8	109
All Public Responses – Draft Policy G9.....	112
Statutory Consultee Responses – Draft Policy G9	121
All Public Responses to the Whole of Chapter 4	123

Headlines for Chapter 4:

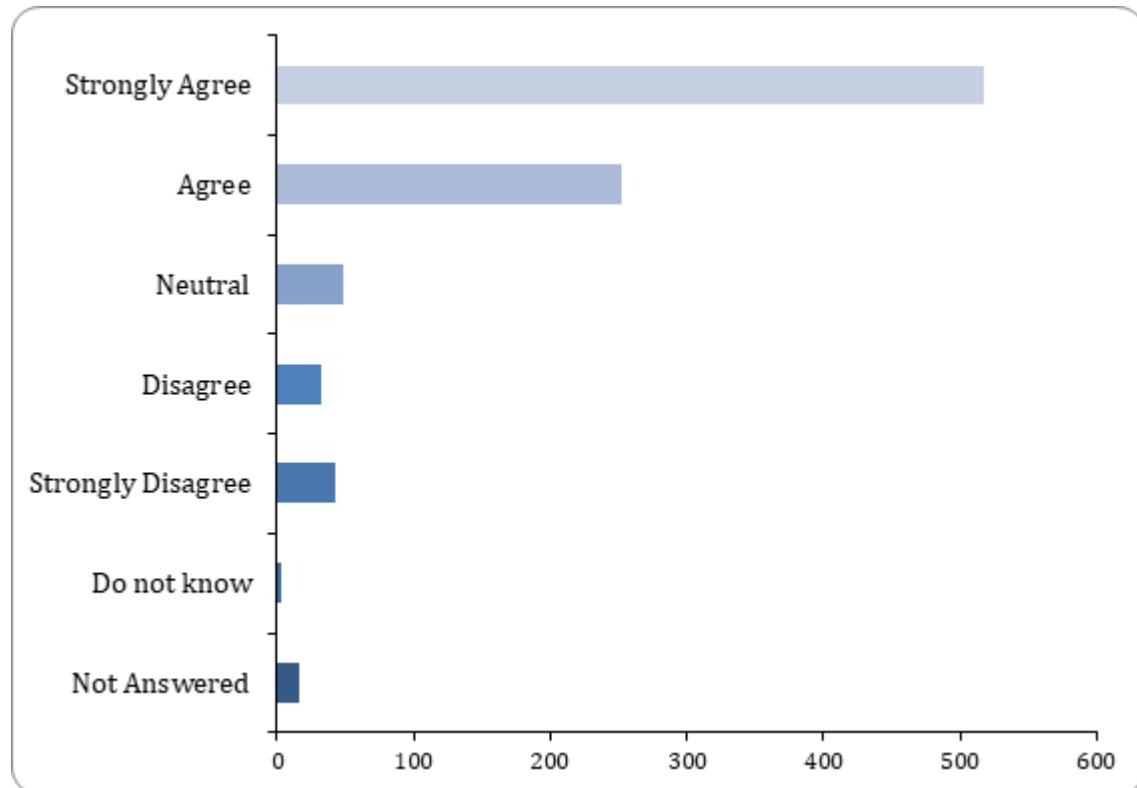
- Consensus regarding the importance of Oxford's network of green spaces to the character and setting of the city as well as the well-being of its inhabitants and for climate resilience
- Green spaces are a finite resource, not easily re-created when lost or damaged
- It should be explicit that greenfield will only be developed if no brownfield sites are available or meet needs
- Lots of support for initiatives and policies that protect the environment and creation of additional green spaces
- Push to work with local wildlife groups to maintain and enhance and educate people about local wildlife
- New developments must be constructed to latest green and sustainability standards and flooding
- Mitigating flooding and sewage issues should be prioritised

Short Questionnaire Responses

Green Spaces

We are protecting our important green spaces and features. We are also requiring biodiversity enhancements and new green features on sites. To what extent do you agree with this approach?

There were 894 responses to this part of the question.

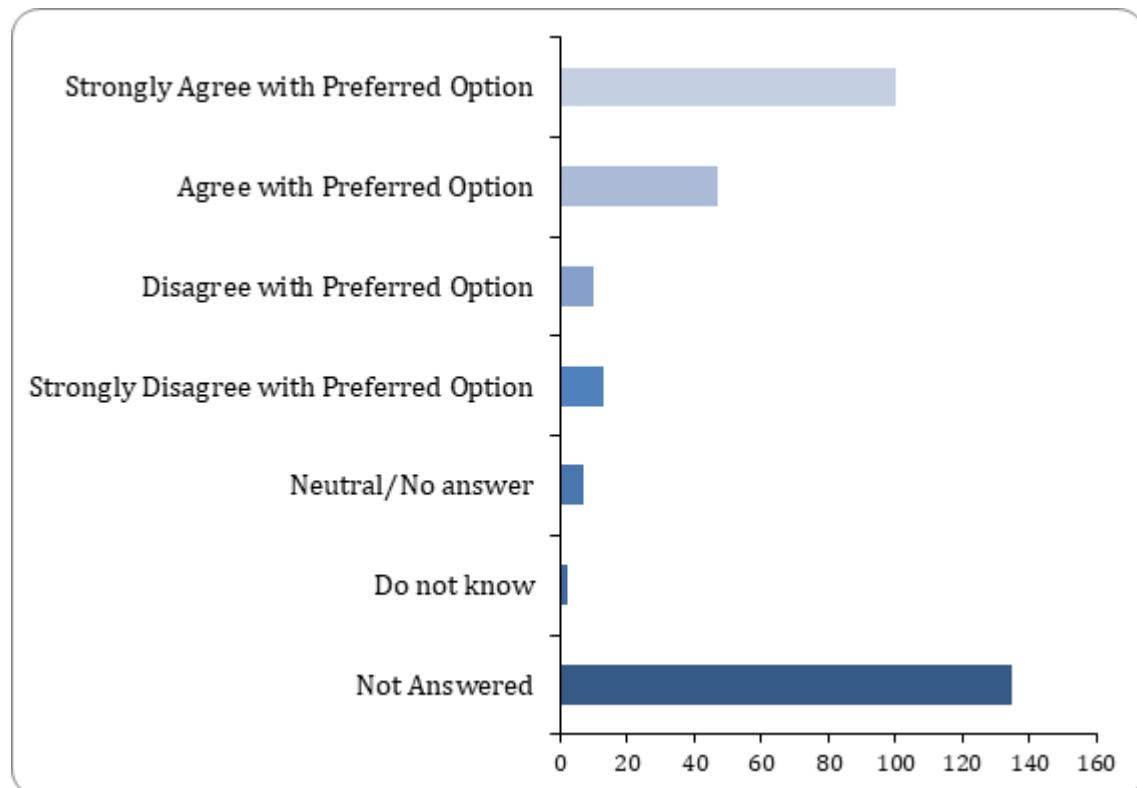


Option	Total	Percent
Strongly Agree	517	56.75%
Agree	252	27.66%
Neutral	48	5.27%
Disagree	32	3.51%
Strongly Disagree	42	4.61%
Do not know	3	0.33%
Not Answered	17	1.87%

All Public Responses – Draft Policy G1

Please tell us what you think about the policy options set 005a (draft policy G1): Green Infrastructure Network and Features.

There were 179 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	10	3.18%
Strongly Disagree with Preferred Option	13	4.14%
Neutral/No answer	7	2.23%
Do not know	2	0.64%
Not Answered	135	42.99%

Draft policy	Topic	Summary of comments	Response
G1	Ambiguity in policy wording	<p>As drafted, the policy suggests that parts of the hospital sites may constitute land in category G1C: All other Green and Blue Spaces. These areas form undeveloped land within a 'Key Employment Site'. These areas could be critical to securing employment floorspace, or other important hospital requirements. It is therefore unreasonable to ascribe a level of protection that would prevent development delivery. The Trust therefore suggests that Key Employment Sites are given additional consideration or dispensation in the proposed policy.</p> <p>Draft Policy G1 also introduces extended criteria for tree loss, now requiring evidence of tested alternative layouts to preserve trees (apparently regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012. The Trust considers the current drafting of this provision in Policy G7 of the adopted Local Plan remains sufficient. Requiring extensive evidence for all trees as proposed – regardless of quality – adds disproportionate burden. BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning applications and design of development that does not need to be repeated in local policy.</p>	<p>The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy/supporting text that revision can be made on a qualitative as well as quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will also be outlined in the final policy wording/supporting text.</p> <p>The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.</p>

Draft policy	Topic	Summary of comments	Response
G1	Unjustified as surplus requirements not considered	<p>In the case of Core Green and Blue Spaces, the proposed policy does not allow the loss to be balanced against the public benefits of the proposal, thereby setting a higher test than national policy. Moreover, the policy does not enable surplus requirements to be taken into account, thereby preventing the redevelopment of any underutilised greenspaces e.g. sports facilities in the future. In comparison, the NPPF (Paragraph 104) sets out protection for greenspaces unless they are surplus or can be reprovided. In the case of Supporting Green and Blue spaces, harm can only be mitigated by ensuring reprovision either to the same standard or higher. Again, this fails to take into account surplus requirements, or any other public benefits which may outweigh the harm caused.</p> <p>In addition to the concern that the reason for designation is not evidenced or necessary, institutions should be given a freer hand to plan their estates having regard to broader planning objectives when applying for planning permission.</p>	<p>Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. In a situation where facilities such as sports pitches (typically categorised as 'Supporting' GI) are within a Core designated space, it is likely because such a space also performs a core function in the GI network, such as active flood storage, or forms part of the setting of a designated heritage asset.</p> <p>Categorisation as a Supporting GI space does not preclude development proposals coming forward, and it will be made clear in the policy that reprovision can be made on a qualitative as well as</p>

Draft policy	Topic	Summary of comments	Response
			quantitative basis (see policy G3) - the requirement for 'like for like' reprovision will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.). The determination of what facilities may be deemed as surplus will be made on the basis of assessments by relevant departments in the council.
G1	Supporting green spaces should have more protection	<p>Supporting Green spaces that are within the inner parts of the city should be protected from development to avoid a future in which the impact of the urban heat island effect gets ever worse. For example, the green spaces to the north of Cowley Road that are currently sports fields have been included as proposed site allocations, even though they play a vital role in all of the above aspects, and are adjacent to one of the least green parts of the City, East Oxford, which already suffers very high summer temperatures during heatwaves. If despite our concerns such sites are taken forward as site allocations, or have planning applications for development on them, we consider that it is essential that there is policy in place that means that there must be a minimum of 50% green space (in addition to gardens within the urban development), including a variety of habitats</p>	<p>Green spaces categorised as supporting spaces will only be considered where any harm or loss is mitigated by replacement to the same standard or higher. Additional evidence will be required from applicants that broader considerations are taken into account specifically for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided in such a way that there are no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that</p>

Draft policy	Topic	Summary of comments	Response
		<p>including trees, and wetlands, which will benefit both wildlife and people. Whilst some areas of the green space could be accessible, a significant proportion (except on the very smallest of sites) should be set aside as a nature reserve with high quality natural habitats and an in-perpetuity management plan, managed through a CIC, Trust or similar. The nature reserve part of the green space should be screened to reduce disturbance to wildlife but could be enjoyed by people through viewing areas and depending on their scale, footpath networks.</p> <p>BBOWT greatly welcome the preferred option, particularly the text: “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).”</p>	<p>consideration has been taken of any specific local needs, or particular deficiencies in a type of space.</p> <p>Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.</p>
G1	Disagree with supporting green space classification	<p>Disagree with Headington Quarry Park, Barton Road Park, Ruskin Fields among others being downgraded from ‘Core’ to ‘supporting’ green spaces, giving them little protection. Emphasise the benefits to public wellbeing, especially for local young people.</p>	<p>Core spaces are designated as such because of fundamental characteristics that make their re-provision impossible or impractical, which in practice often applies to designated ecological sites (e.g. SACs, SSSIs etc), flood storage, designated heritage sites etc. While supporting spaces may not have</p>

Draft policy	Topic	Summary of comments	Response
			statutory designations, they still play important roles for public amenity and wellbeing, as well as environmental functions. Core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces').
G1	Objection to tiered GI	<p>The proposed wording is a deviation from Policy G1 of the adopted Local Plan, which does not rank Green Infrastructure and confirms that planning permission will not be granted for development that would result in harm to the Green and Blue Infrastructure network, except where it is in accords with relevant mitigation or exceptions identified in supplementary policies.</p> <p>Based on the above, this policy wording and allocation methodology is objected to for a number of reasons:</p> <ol style="list-style-type: none"> 1. The allocation for Core and Supporting arbitrarily draws a line between one and the other, without any reasonable balance being provided to a sliding scale of quality both internally within individual Green Infrastructure, or when comparing the lowest quality Core against the highest quality Supporting. 	<p>The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context.</p> <p>Core spaces are designated as such because of fundamental characteristics that make their</p>

Draft policy	Topic	Summary of comments	Response
		<p>2. The assumption that Core 'spaces cannot be moved/re-provided sufficiently without compromising the overall character and function' is subject to each site's individual merits and proposals. For example, Core areas may have lower quality sub-areas within them. This conclusion should not be drawn at this stage and result in a blanket in-principle ban on development within designated areas.</p> <p>3. The proposed wording conflicts with the aim of the policy as outlined at Paragraph 4.6 as outlined above, which seeks to protect Green Infrastructure from 'inappropriate development', requiring mitigation where development comes forward.</p> <p>4. The Core policy wording has no flexibility for the scale of green or blue infrastructure, scale of existing and proposed development, exceptional circumstances, or the possible wider reprovision or enhancement of the infrastructure.</p> <p>The following updates are requested:</p> <p>1. The principle of 'Core' and 'Supporting' be removed, in line with Option A of the Background Paper, as well as the approach currently within the adopted Local Plan. The overarching policy wording should seek protection, but acknowledge that the loss may be justified subject to adequate re-provision or enhancements, and / or sufficient</p>	<p>reprovision impossible or impractical, or their loss will have a significant adverse impact to the character or GI network of the city. In practice the designation will apply to designated sites (e.g. SACs, SSSIs) or sites of heritage significance or scheduled sites. Other national policy considerations will also apply to such sites. There are no situations envisaged whereby planning permission that results in loss or harm to such spaces would be acceptable. Any development proposals with the potential of affecting 'Core' designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the</p>

Draft policy	Topic	Summary of comments	Response
		justified evidence of the need for the development in the context of wider site function and use. OR 2. Alternative policy wording for Core sites, with the allowance for development in 'exceptional circumstances', as recommended by Option B of the background paper.	designated spaces. Formulating 'exceptional circumstances' will be a subjective exercise and run risk of deprioritising spaces that may still bring about benefits
G1	Justification unclear	<p>The grounds of Mansfield College are categorised as Private Open Space (group G1B). The justification behind this categorisation is unclear especially as many other smaller areas of space associated with other colleges are not categorised in the same way. The background paper sets out reasons why sites may be categorised as important Green infrastructure including biodiversity reasons, heritage reasons or climate change reasons. There is no assessment on the biodiversity of the site, it doesn't appear to be recorded as important from a heritage point of view (acknowledging that the adjacent buildings are listed), nor is the site within the floodplain.</p> <p>For Category G1B sites the policy allows for planning permission to be granted where any harm/ loss is mitigated through 'sufficient reprovision', although this is not defined. The policy also identifies that this should be on site. There is no consideration in the policy for those sites which have restricted space and no other options for development opportunities, such as</p>	<p>The categorisation of a green space or feature as G1B (supporting) can depend not only on specific functions but other considerations such as user amenity, relationship to and impact on the setting of other buildings etc. The categorisation does not preclude development proposals coming forward, and it will be made clear in the policy that reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving specific function (e.g. sports pitch, play space etc.), which will</p>

Draft policy	Topic	Summary of comments	Response
		Mansfield. The competing need of the College and the Council's desire to retain green spaces which are not accessible to the public could be considered to sterilise the College's ability to meet the needs of its students, particularly in relation to student accommodation.	also be outlined in the final policy wording/supporting text.
G1		Ok. But exercise judgement. There are too many college sports grounds only used a little. If one were to become a car park that would be a good thing. Never say never.	Comment noted.
G1	Objection to approach	<p>This consultation fails to identify or map a network of Oxford's green blue infrastructure. This is a significant omission which affects the validity of the consultation and which cannot be justified given the existence of the longstanding Green Infrastructure Report (2022) and the availability of the results of the Local Nature Recovery Strategy consultation responses report (January 2025) and liaison with the LNRN.</p> <p>An interim consultation which maps Oxford Green Blue Infrastructure and includes findings from the LNRS must be undertaken prior to any Reg 19 consultation.</p> <p>Oxford's green space network should encompass and connect all of the existing green - blue infrastructure in the city and identify sites where new genuine brownfield development can connect</p>	<p>An interactive policies map including layers showing the GI network was published by the launch of the Reg 18 consultation, and links to it were provided on the council webpages and consultation materials which all remain active. Improvements to the public interface will be made in response to user feedback on a continuous basis.</p> <p>The NPPF includes a requirement for plans to distinguish a hierarchy of nationally and locally designated sites, to allocate land with the least environmental and</p>

Draft policy	Topic	Summary of comments	Response
		<p>with this network. In addition, Oxford's nature network should connect with green infrastructure beyond the city boundaries. This policy should include the Oxford Earth Academy work on the Oxford Education Nature Park.</p> <p>There should be a presumption against any loss of trees, hedgerows and woodland. No losses should only occur except in truly exceptional circumstances e.g.: safety.</p> <p>All Green space should be protected; there should be no hierarchy.</p> <p>The preferred option requires identification/designation of green and blue infrastructure sites for protection. You suggest a hierarchy of protection for spaces within the Green Infrastructure network of green spaces, in which ecological function takes priority over recreational/health functions. In the last GI study, Bertie Park was cited as an example of a small, but multi-functional site. In spite of the fact that it is a highly valued community space, it would be at the bottom of the hierarchy. You state that planning permission will only be granted for proposals relating to sites at the bottom of the hierarchy "where any impacts are mitigated by ensuring sufficient reprovision, ideally onsite, and to the</p>	<p>amenity value, and to take a strategic approach to maintaining a network of green infrastructure (para 188). The NPPF also sets out the strict conditions for when loss of open space, sports land/buildings and pitches can be lost (para 107).</p> <p>The proposed hierarchy in the policy is consistent with the approach required by national policy and has a framework for how it applies to the Oxford context.</p> <p>The hierarchy consists of three levels of protection. The core (G1A) and supporting spaces (G1B) are afforded a higher level of protection than the minimum mandated in the NPPF (which is applicable to G1C 'all other green/blue spaces'). The conditions for approving development affecting supporting spaces (G1B), such as Bertie Park, will be required to sufficiently reprovide affected</p>

Draft policy	Topic	Summary of comments	Response
		<p>same standard or higher, or if it can be demonstrated in the application that current provision is surplus to requirements." There is no detail on how you determine whether a site is "surplus to requirements".</p> <p>Draft policy "would seek to protect all public and private green infrastructure in the city from inappropriate development and ensure that, where it comes forward, development mitigates any potential impacts." "Seek" means that you are not necessarily going to protect GI, and if it comes forward for development, instead of replacing recreation spaces with equivalent or better, you make clear your intent to "mitigate any potential impacts." The following statement is even worse: "the draft policy also sets out conditions by which certain types of green space may be lost to other forms of development, however, there may also be additional considerations which would apply to applications that affect certain types of spaces including how these might need to be re-provided." You claim to clarify this in section 4.2 where you actually make clear your intention to depart from national guidance with reference to Parks and gardens, accessible greenspace and amenity greenspaces: "Where relevant, applicants will have to demonstrate consideration of how any</p>	<p>spaces to the same standard or higher and the approach aligns with national policy.</p> <p>The policy wording and supporting text will set out the means by which the standard of reprovision will be assessed.</p> <p>Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.</p>

Draft policy	Topic	Summary of comments	Response
		<p>loss can be mitigated, especially if this is located in an area which already suffers from a deficit."</p> <p>How would OCC determine whether a mitigation in an area which already suffered a deficit was adequate? OCC needs a clearly stated policy reflecting national guidance, which protects our recreational spaces, especially in working class areas.</p>	
G1	Option A and low quality green spaces	<p>Whilst supporting option A generally, disagree with option A's wording: <i>This would allow us to release poorer quality spaces for other needs.</i> Question who assesses this and what is factored into it? All green space should be protected, and brownfield land should be prioritised.</p> <p>TPOs cannot protect trees alone and TPO protection can be invalidated (e.g. if signs of sickness in tree). Do not allow mature green healthy trees to be felled for development. Do not agree with option D's wording that additional tree protections beyond TPOs could be considered too onerous.</p>	<p>The highlighted wording is from a section of the supporting background paper that contains possible opposing arguments to adopting the preferred option. Our response to this line of argument is contained in the same section.</p>
G1	Mitigation against loss of trees	<p>It should be acknowledged that mitigation against loss of existing mature trees and hedgerows is often inadequate, simply replacing with new trees or hedges will not replace the existing biodiversity.</p>	<p>This policy and others in the plan (G2, G3, G6) incentivises the retention of existing green infrastructure and natural features in development proposals and limits the loss of established features such as</p>

Draft policy	Topic	Summary of comments	Response
			mature trees and hedgerows to exceptional circumstances in line with Government guidance and substantial evidence backing or mitigation arrangements.
G1		Strongly agree with protections for green spaces. I would adjust the policy slightly to reflect a 'biodiversity first' approach, for example where you allow for the removal of living trees, instead of saying, "...where it is clearly justified" gives space for putting developers' concerns above the concerns of our lessening biodiversity. Perhaps this could be reworded to say, "Loss of woodlands, hedgerows and trees is not permitted. In situations where this is unavoidable, there must be two full ecological surveys to show two opinions, and there must be a rewilding plan for biodiversity gains, with an appropriate assigned ongoing plan and budget for supporting the establishment of a the new green area."	The circumstances where the loss of trees are highly limited in the policy and will be subject to justification by substantial evidentiary backing and mitigation arrangements. Other plan policies such as the greening factor (G3) and BNG (G6) policies also incentivise the retention of mature green infrastructure features, which in themselves contribute greatly to policy compliance where they are retained.
G1	Protection of green space around designated sites	Major national sites of biodiversity importance (SSSIs SACs), and arguably local biodiversity sites also, should never have adjacent lower quality green land developed – important for buffering and supporting function of these sites. For example: can be crucial in rainwater supply to fen springs in SSSI/LWS fens hundreds of metres away.	Policy G6 sets out the requirements for the avoidance of adverse impacts on designated sites, including requirements for distance buffers. The policy wording and supporting text includes references to studies produced

Draft policy	Topic	Summary of comments	Response
			by the council, Natural England and others, and applicants will also be required to demonstrate that they have taken into consideration the recommended actions in their schemes.
G1	Protection of local biodiversity sites within G1 network	Draft policy protects only the sites which already have legal protection i.e. SSSIs and SACs. Local sites should be protected in same way as sites that are already nationally designated. Loss of local wildlife sites cannot be mitigated in respect of the biodiversity functions that are lost.	This is incorrect, draft Policy G1 includes all locally designated sites that form a part of policy G6's ecological network as 'core' parts of the network (because these functions cannot be easily reprovided). This includes the LWSs, OCWSs and LNRs.
G1	Policies in neighbourhood plans	Green Spaces and Biodiversity policies of Headington Neighbourhood Plan have been ignored – would be a useful basis for the policy.	Policies for the local plan are developed on the basis of a broad evidence base and consultation, which have to be coherent as a whole and applicable to all areas and sectors of the city with as few exceptions and caveats as possible. Local plans policies also carry more weight than neighbourhood plan policies unless the latter cover issues that are not addressed in the local plan.

Draft policy	Topic	Summary of comments	Response
G1	Scope of policy too wide	<p>Treating every green fragment as sacrosanct, with a presumption against any net loss simply because it sits inside a city-wide “network”, locks low-value, poorly located scraps of land into perpetual idleness and blocks the gentle infill Oxford needs. The draft G1 text even classes the smallest “supporting” and “other” spaces alongside the historic flood-meadows under the same near-absolute protection. That would make it far harder to swap a redundant verge or disused private lawn for new homes plus a better-designed pocket park nearby—an outcome the NPPF explicitly allows where open-space quality is improved.</p> <p>A calibrated, site-by-site designation (Alternative 1) still gives strong, tailored safeguards to the genuinely strategic assets (core floodplains, SSSIs, heritage gardens, main sports pitches) while letting modest, ecologically poor plots be upgraded or relocated if a scheme secures equal or higher amenity and biodiversity value.</p>	<p>Small green spaces have the potential to bring about local amenity and environmental benefits, which can be cumulative across a wider area where they can be linked. For the city as a whole the cumulative benefits are best harnessed when green spaces are considered as part of a coherent network. As a spatially constrained city with limitations on the amount of significant new green spaces within its boundaries, the retention of green spaces is even more important. The network approach is also in alignment with the NPPF.</p> <p>The policy approach does not preclude development in suitable locations, although the emphasis is on the development process becoming a way for the delivery of enhanced/improved green infrastructure.</p>
G1	Residential Garden Land	Policy should generally prevent creation of nonpermeable surfaces especially on house	An Article 4 direction requires a specific broader process that is

Draft policy	Topic	Summary of comments	Response
		<p>frontages in favour of guaranteed SuDS or other green areas – to allow rainfall penetration and mitigate impacts on drainage systems in relation to flood risk. Policy should go further and not allow SuDS either in Lye Valley catchment as this is not sufficient to mitigate loss of natural surface cover.</p> <p>Can Article 4 permitted garden development rights be removed within the defined catchment area of the Lye Valley?</p>	<p>led by the wider council and outside of the local plan framework.</p> <p>Qualifying schemes will be subject to the UGF requirements of policy G3, which is intended to incentivise the integration of natural surface cover. However the methodology is simple to use and developers at all scales and types will be encouraged to apply it on their schemes. Policy G6 addresses the protection of the ecological network including the Lye Valley SSSI.</p>
G1	Residential Garden Land	<p>We support most of this policy but have concerns about the consequences of the policy to allow building on residential garden land. We would like to see a requirement for consultation/engagement with surrounding residents, beyond what is generally required, as in some locations this may have a significant impact upon the amenity of nearby homes. We would like to see further creativity when building on residential garden land, to explicitly off-set by creating further green corridors with pocket parks, community gardens/tiny forest gardens in areas of</p>	<p>This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.</p>

Draft policy	Topic	Summary of comments	Response
		<p>social/green deprivation, which will have multiple positive effects including health, happiness, food growing, carbon sequestration and enhancement of biodiversity. This should be an essential pre-requisite when paving over/ building on any garden spaces.</p>	
G1	Objection - Re-provision	<p>The policy is unsound and ineffective, as it is mathematically impossible for a development which reduces green space, to “reprovision” elsewhere, which is also green space. The term is not explained in the glossary. Green space in allocated sites is not even marked as such, it does not even officially exist.</p>	<p>The requirements for reprovision and the basis on which it may be considered acceptable will be described in the policy wording and supporting text. Reprovision can be made on a qualitative as well as quantitative basis, which allows consideration for improved green features even where the footprint is reduced (see policy G3). A requirement for 'like for like' alternatives will mainly be applicable in situations involving a specific function (e.g. sports pitch, play space etc.).</p> <p>Site allocations will have specific requirements in relation to green infrastructure provision,</p>

Draft policy	Topic	Summary of comments	Response
			which will be site specific – where green spaces already exist, they will be identified in the policy wording along with guidance on where they can be retained or enhanced. Other relevant policies will apply in addition.
G1	Objection – Residential Garden Land	<p>The conflict between Residential gardens in designated green space protections in Policy G1 must be resolved in favour of Green Space protection, or Core Green space could be lost where land is in both as in the Lye Valley example above.</p> <ul style="list-style-type: none"> • G1 - It is unclear whether designated green space designation prevails over residential garden building in policy G1 • G1 - para b) is entirely redundant. 	This aspect of the policy is more likely to apply to be applicable in built up areas that are already previously developed and not under any GI designation. In any case any proposals will be expected to be compliant with the requirements of all relevant policies.
G1	Omissions in designated GI network	The Oxford draft local plan policy map identifies a number of sites around Osney Island designated as G1 (green and yellow – presumably corresponding to the G1A and G1B mentioned in the draft policies, p.66) and Greenbelt. However it crucially fails to recognise both the main river, from where it passes under the railway up to Botley Road, and the Osney Stream, as part of the ecological network in the area. It is curious that the local	Blue corridors are already subject to strong protection through national policy, and other policies in the Local Plan (see policy G7 on flood risk). Banks to watercourses are addressed in requirements for policy G2 (10m buffers to watercourses). The expectation

Draft policy	Topic	Summary of comments	Response
		<p>primary school and church are marked G1A (green) when the far more significant river network, including its banks, is not marked. This needs to be rectified and these areas should be designated G1A. We suggest the banks of the rivers are marked with a green line, and the marina and Osney Lock Hydro (currently missing from the map) are marked green.</p> <p>Members of the Osney community participated in the consultation last year on the County Council Local Nature Recovery Strategy (LNRS). As a result, both the main river corridor and the Osney Stream are marked green on the draft LNRS map – making them part of the nature recovery network. The draft Oxford local plan map is inconsistent with the draft LNRS map and should be brought into line with it. The suggestion of marking additional areas in green proposed in the previous paragraph would achieve this.</p> <p>We are concerned that a failure to clearly designate these stretches of river as G1A leaves them as 'other spaces' which could create ambiguities about whether the stated biodiversity policies, which we support, apply to this area.</p>	<p>is that this should ensure these spaces are not built upon and incentivises their renaturalisation where possible to improve the benefits they provide for people and nature.</p> <p>The LNRS mapping highlights suggested areas where habitat creation and improvement actions could be delivered to offer the greatest benefit towards local biodiversity priorities where opportunities arise. The elements in those maps play a different role to the designations under policy G1 and is therefore not something we are looking to completely mirror due to the differing purposes. Many of the Local Plan's protected spaces will be able to offer opportunities to support the types of measures the LNRS identifies, and we will continue to consider where it is possible to align with various elements of the LNRS and its general priorities as we further</p>

Draft policy	Topic	Summary of comments	Response
			develop the Local Plan, even if this will apply in other policies other than G1.
G1	Objection – policy not effective – amendments suggested	<p>There appear to be overlaps between the GI policies and also conflicts with the wider aspirations and proposed allocations of the Plan.</p> <p>Policy G1 refers to protection of green infrastructure (GI). The Plan defines core and supporting GI which is difficult to differentiate on the interactive policies map and will result in difficulties in interpretation given the scale of mapping involved. In addition, it is questioned how the land has been identified and defined, for example, areas within Christ Church that are shown as “core” GI are actually paths and compost bins. In addition, the policy is very strict and does not allow any loss of or harm to any Core GI. This is too restrictive. In relation to Supporting GI the policy requires re-provision ideally on site. It is hard to see how this can be achieved without demolition of buildings? Policy should be amended to provide some flexibility, especially given the inaccuracy in the mapping and assessment criteria and clarity provided around how the Council considers mitigation on site could be achieved. In relation to loss of trees on a site, it is not always possible to re-plant on the site and make efficient use of the land. As such some cascade to planting</p>	<p>Any development proposals with the potential of affecting ‘Core’ designated green spaces would at the minimum be required to demonstrate that they do not result in loss or harm, and that the proposed uses are complimentary, compatible or provide enhancement to the designated spaces. Formulating ‘exceptional circumstances’ will be a subjective exercise and run risk of deprioritising spaces that may still bring about benefits.</p> <p>Categorisation as a ‘supporting space’ does not automatically preclude development proposals coming forward, and it will be made clear in the policy/supporting text that re-provision can be made on a qualitative as well as</p>

Draft policy	Topic	Summary of comments	Response
		<p>trees nearby should be considered. As drafted the policy is not effective and will impact on the wider development policies in the plan seeking to make efficient use of land. It would make sense to combine the criteria in this policy with those in policy G6. Suggested Amendment:</p> <ol style="list-style-type: none"> 1. Provide more detailed mapping to accurately define the location of the GI features and change the colour coding to better differentiate between the categories. 2. Provide more flexibility in the policy to ensure it takes a positive approach to development. 3. Consider combining the policy with Policy G6. 	<p>quantitative basis, which allows consideration for improved or more functional green features even where the footprint is reduced.</p> <p>Creating a standalone G1 policy as opposed to consolidation with G6 is considered to be a more effective way of addressing the wide range of green spaces that may warrant protection on grounds other than biodiversity or ecology, such as heritage significance, local amenity etc.</p> <p>The policies map is under constant review and improvements in accuracy and usability are made on an ongoing basis following user feedback, which is always welcomed.</p>
G1	GI within Key Employment Sites/ future site allocations (ARC)	<p>The undeveloped plots at ARC Oxford (Plot 3000; 8200/8400; and 9200) may constitute land within the G1C category. These plots form undeveloped land within a 'Key Employment Site'. These sites (and the consented proposals at Plot 2000) are</p>	<p>The policy approach behind the G1C is consistent with NPPF approach. Spaces in this category are likely to be fragmented, smaller or have</p>

Draft policy	Topic	Summary of comments	Response
		critical to securing employment floorspace. It is unreasonable to ascribe a level of protection that would prevent these coming forward. ARC requests these sites are excluded from the G1C space designation, or any other designation that would undermine their status.	other characteristics that reduce their multifunctionality in a GI network context. This categorisation does not preclude development if it is demonstrated that there is reprovision or that the space is surplus to requirements, as appropriate to the application.
G1	“Loss of trees” criteria too strict	<p>Do not support introduction of “extended criteria” for tree loss set out in G1 that requires evidence of tested alternative layouts to preserve trees (regardless of quality), as well as general evidence that these have been minimised in accordance with BS 5837:2012.</p> <p>Extant Policy G7 (OLP2036) remains sufficient. Requiring extensive evidence for all trees as proposed (regardless of quality) adds a disproportionate burden.</p> <p>BS.5837:2012 already embeds a structured, evidence-led approach which must be taken into account in planning applications and design of development that does not need to be repeated in local policy.</p>	The policy criteria with respect to tree loss follows the current adopted policy approach and also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Loss of Tree criteria not strict enough	We also have concerns about the tree policy in 4.1.e) which sets the replacement of lost trees at “minimum of no net-loss of tree canopy cover”.	The policy criteria with respect to tree loss follows the current adopted policy approach and

Draft policy	Topic	Summary of comments	Response
		<p>We feel that this is not ambitious enough due to the important role played by trees in nature recovery and climate mitigation. The policy could be replaced by a minimum of 1.5 times the amount of tree canopy lost. This is also particularly important when planting new trees, as many will be lost due to extreme climatic fluctuations, so to plant ambitiously and hopefully is to be encouraged.</p>	also takes into consideration the Urban Tree Canopy standard contained in the Natural England GI framework.
G1	Exemptions of private spaces	<p>The City should focus on areas, such as parks, which are owned and managed by the city. Private developments should not be subject to so-called green planning permission requirements.</p>	All green spaces in the city, particularly those that perform ecological functions such as flood storage and biodiversity sites, have a cumulative impact on the natural environment of the city whether or not they are public or private., which makes it prudent to have policies that address how development affects them. It is also a requirement of national policy to have an approach in place.
G1	Recommended amendments to strengthen policy	<p>The policy could be further strengthened by:</p> <ul style="list-style-type: none"> - specifying minimum buffers for ancient woodland and other irreplaceable habitats - setting an overall canopy cover target for the Oxford City Council area - requiring that new planting is from suitable species and UK sourced for biosecurity 	

Draft policy	Topic	Summary of comments	Response
		<p>- targeting new planting at areas prioritised in the Local Nature Recovery Strategy and/or of low tree equity.</p> <p>The Oxford Urban Forest Strategy made the connection between areas of deprivation and low tree cover. That connection is mapped further in the UK Tree Equity scorecard and map https://uk.treeequityscore.org/ which identifies the neighbourhoods in greatest need of new tree cover. We recommend this approach be integrated into the Local Plan.</p>	
G1	Strongly disagree with preferred option	<p>What will happen to sites which are not to be considered part of the Green Infrastructure Network? You say that you intend to go beyond the requirements of the NPPF. Green spaces are covered by the NPPF “golden rules” (s.156-7). These don't mention reprovision, so talk of mitigation may be appropriate, however NPPF s.104 which covers public open space has very specific requirements requiring not mitigation, but reprovision of open space. The wording of NPPF s.104 should be reproduced in the 2042 plan.</p> <p>You propose identifying a network of GI/BI sites for protection. The spaces “to be most strongly protected are those that provide a multitude of functions.” This is logical. The list of functions is long: Accessibility, Tourism, Heritage, Food</p>	<p>The policy approach is based on a hierarchy of protection for green spaces, with a requirement for reprovision of spaces identified as Supporting GI (which includes recreation and sports grounds) ideally onsite. The wording is consistent with the NPPF.</p> <p>Spaces identified as Core GI are so because they have functions that are specific to that site and cannot be replicated or reprovided anywhere else, e.g. functional flood plains,</p>

Draft policy	Topic	Summary of comments	Response
		<p>production, Formal sports, Children's play, Youth facilities, Tranquillity, Biodiversity, Carbon storage, Climate change adaptation. The local plan should use this list to inform development of sites, rather than as an excuse to shut them down.</p> <p>You suggest a hierarchy of protection for spaces within the Green Infrastructure network, in which ecological function takes priority over recreational/health functions.</p> <p>Firstly, recreation space should not be at the bottom of the hierarchy. Secondly, the local plan should not require mitigation for loss of recreation sites. It should reproduce the wording of NPPF s104.</p> <p>Conflating green and public open space results in vagueness of statements such as those underlined below:</p> <p>"limited opportunities to provide new space means that loss of existing green features needs to be <u>carefully considered</u> and <u>resisted wherever necessary</u>" and "sets out conditions by which <u>certain types of green space</u> may be lost to <u>other forms of development</u>, however, there <u>may also be additional considerations</u> which would apply to applications that affect <u>certain types of spaces</u> including how these might need to be re-provided." Such statements could be used to support any decision.</p>	<p>designated sites (SSIs, SACs) etc.</p> <p>Open public spaces (parks, playgrounds etc) will only be deemed surplus to requirements if it is identified as such by relevant departments in the city council like the communities and parks teams.</p>

Draft policy	Topic	Summary of comments	Response
		The local plan should clarify the criteria which will be used to determine whether GI is expendable.	

Statutory Consultee Responses – Draft Policy G1

Natural England

Draft Policy	Summary	Response	Outcome
G1	<p>Welcome identification/protection of those spaces forming part of the Green Infrastructure core network G1A and G1B. Encourage Council to include existing green infrastructure features such as irreplaceable and priority habitats in addition to ancient woodland, veteran trees and important hedgerows, within the protected network.</p> <p>Flag that the Green Infrastructure Framework Principles and Standards for England should be used to help meet NPPF requirements for GI. They include recommended standards to inform policy for the quality and quantity of multifunctional green space including the production of GI Strategies, access to natural</p>	<p>Thanks and welcome the support. We consider that irreplaceable habitat is sufficiently protected through national policy and policies of the Plan refer to this elsewhere. Significant areas of priority habitat are located within areas that are protected by the core network, as well as on the ecological sites. Policies G1 and G6 then set out requirements where development impacts priority habitat elsewhere.</p> <p>We have referred to the GI Framework in drafting the Local</p>	No further action proposed at this time.

Draft Policy	Summary	Response	Outcome
	green space standards, urban greening factors and good design principles.	Plan, including incorporating the Urban Greening Factor into local policy.	
G1 and site allocations	Note that several proposed site allocations impact on the GI Core network, particularly on G1B assets. Suggest that site allocation policies impacting G1 spaces include an estimate of the likely quantity of sufficient on site GI reprovision required to mitigate for any losses, the type of reprovision required and if it is not possible to provide the reprovision on site, then identification of options/locations for offsite delivery to another part of the network within the city.	It is not possible to accurately estimate this at plan-making stage as it is highly dependant of the detail of any subsequent application. The allocations will make clear where they include parts of designated GI network and that the requirements of policy G1 apply. Where possible we will suggest ways that applicants could meet the requirements.	Ensure relevant allocations flag presence of GI network and where possible set out broad suggestions for meeting the requirements of policy G1 where a proposal would impact these spaces.

Sports England

Draft Policy	Summary	Response	Outcome
G1	Policy G1 - Figure 4.1 – Sport England is concerned that the hierarchy proposed in Figure 4.1. Playing fields should be protected from development, change of use or development should only be accepted where the tests in paragraph 104 of the	The Plan sets out criteria by which development proposals are to be assessed. The policy approach is to resist the loss of supporting spaces (including	No further changes proposed.

Draft Policy	Summary	Response	Outcome
	<p>NPPF are met.</p> <p>Figure 4.2 – Sport England has the same concerns with this suggested policy text as it seeks to rewrite the clear tests in National Planning Policy Framework (paragraph 104). For example, it is welcome that the Council is updating its Playing Pitch Strategy. This is the appropriate document for assessing whether or not a playing field is surplus to requirements (paragraph 104). Sport England recommends that the Council reviews paragraph 103 and 104 of the NPPF and seeks to protect much needed sport and recreation facilities and identify new opportunities to meet needs. The draft policy fails to do this instead it appears to discuss how they can be removed rather than protected.</p> <p>Draft Policy G1 – the council needs to draft a new policy that conforms with paragraphs 103 and 104 of the NPPF, referencing existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, which the NPPF advises should not be built on. Sport England does not object to the Council having green infrastructure policies (see NPPF paragraphs 188 and 199 and the definition on page</p>	<p>playing fields, sports pitches etc) and the criteria are consistent with the requirements of paras 103 and 104 of the NPPF.</p> <p>The Plan is not intended to be an assessment tool for determining whether or not a space is to be considered surplus i.e. suitable to be lost with no reprovision. The Playing Pitch Strategy currently in development will be part of the evidence base that will provide a quantitative and qualitative analysis of current provision and expected need for such spaces in the city.</p> <p>Where proposed schemes affect supporting spaces, evidence will be required from applicants that broader considerations are taken into account specifically</p>	

Draft Policy	Summary	Response	Outcome
	<p>73) but the Council must have robust policies in place that protect existing open space, sports and recreational buildings and land, including playing fields and formal play spaces. Built sports facilities and play areas also need protection from development and the plan requires a policy setting this out, not one that appears to support the change of use of these facilities for development.</p>	<p>for sports facilities and amenity spaces – including a demonstration that spaces can be reprovided with no deficits against demand, opportunities are taken for suitable alternative provision where that is appropriate, or that consideration has been taken of any specific local needs.</p>	

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
Policy G1 Protection of GI	<p>Landscape and Nature Recovery – Biodiversity</p> <p>Local Plan Policies map shows some sites classed as G1A as located outside the city boundary (including some designated sites, but not all). Clarification is therefore requested to address this inconsistency.</p>	<p>Noted – we will look into this issue.</p>	<p>Oxford City Action: Investigate why designated sites are outside city boundary.</p>

Draft Policy	Summary	Response	Outcome
	<p>With regards to impacts on trees mentioned on pages 68 to 69, ecological enhancement of existing trees and woodland should also be considered for inclusion. It may also be important to refer to onsite compensation in advance or as soon as possible after the impact being preferable in this section through following the mitigation hierarchy including temporal and spatial considerations.</p> <p>Landscape & Nature Recovery– Landscape</p> <p>The policy primarily focusses on spaces shown on the policy map and less on the connecting role of green infrastructure features.</p> <p>As the Local Plan does not propose a specific tree policy, this policy together with G2 also has to ensure that existing trees and other important vegetation are</p>	<p>Policy G5 deals specifically within enhancing on-site biodiversity.</p> <p>Noted.</p> <p>Policy G5 also deals with enhancing on-site biodiversity.</p>	<p>No Action Required</p> <p>No Action Required.</p> <p>No Action Required.</p>

Draft Policy	Summary	Response	Outcome
	<p>adequately protected from development.</p> <p>It is recommended that the policy puts a greater emphasis on avoidance and mitigation of impacts on trees in line with the mitigation hierarchy before offering the option of compensation.</p> <p>Existing green infrastructure features e): the policy only requires no-net loss in canopy cover at 30 years. Does the policy not wish to be more ambitious especially in areas where canopy cover is low?</p>	<p>Noted.</p> <p>The policy has been informed by evidence.</p>	<p>No Action Required</p>
	<p>The policy would benefit from more detail on what information is required when assessing the impacts on trees such a tree survey to BS5837:2012 standard and an Arboricultural Impact Assessment (AIA).</p>	<p>Noted. Separate guidance is included on our website about trees in the planning process.</p>	<p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>The section on Residential Garden land focusses on the acceptability of developing gardens rather than the protection of the gardens as Green Infrastructure assets. The loss of structural garden vegetation to development including the creation of driveways for parking can have an adverse effect on green infrastructure connectivity between spaces of the GI network.</p> <p>Consideration should be given to whether this policy should also seek to address the protection of existing gardens.</p> <p><i>“Planning permission will not be granted for development that results in the loss of other green infrastructure features such as hedges or ponds where this would have a significant adverse impact upon public amenity or ecological interest.”</i></p>	<p>The NPPF requires us to define “residential garden land” for the purposes outlined in the policy.</p> <p>No proposed wording. No change proposed.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>Information should be provided on how this is proposed to be assessed.</p> <p>County Council Property and Estates Team</p> <p>Oxford County Council Property and Estates Team owns various school playing fields and other sites, which primarily fall within the “Supporting Green and Blue spaces” category.</p> <p>Whilst Oxfordshire County Council Property and Estates Team endorses the aims of this draft policy, it is considered essential that a flexible element is included to ensure that Oxfordshire County Council Property and Estates Team will not be prevented from delivering their statutory duties which may, at some point, include the expansion of educational facilities or areas which may be better utilised for other purposes or alternative provisions.</p>	<p>Where additional information is needed to support policy implementation, this will be covered in an appropriate Technical Advice Note (TAN)</p> <p>Noted</p> <p>No alternative wording suggested. No change proposed.</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

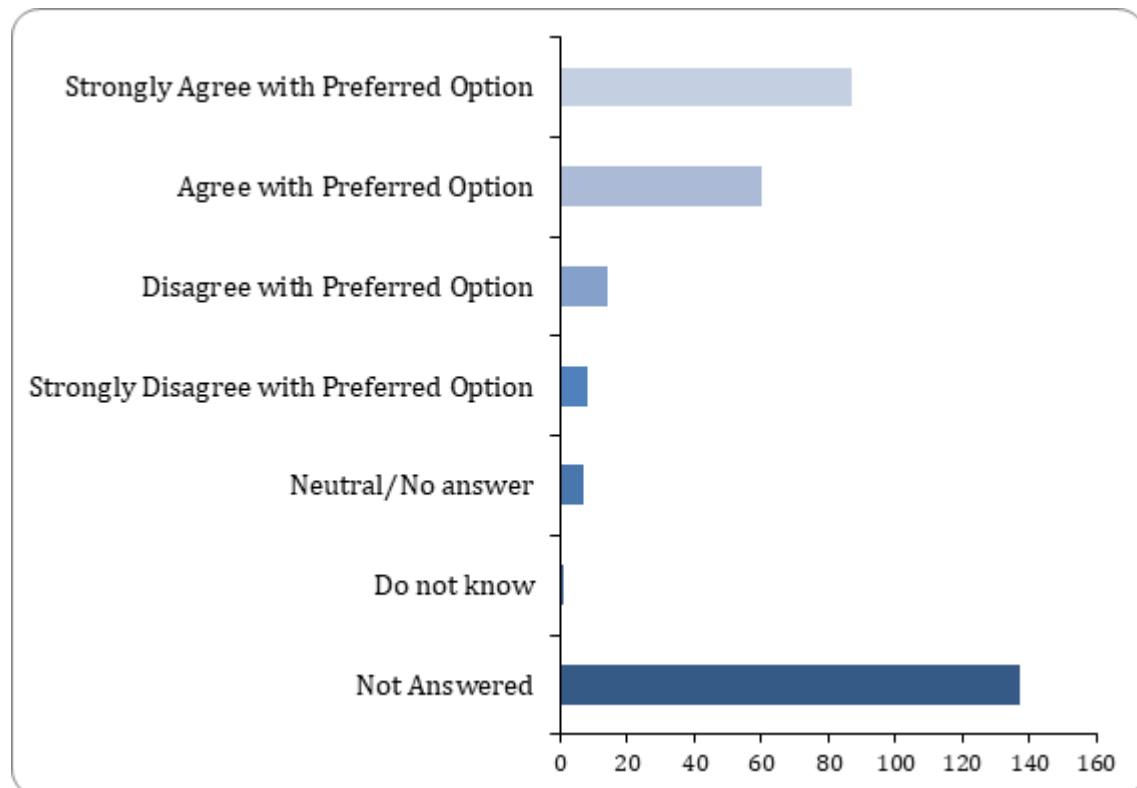
Draft Policy	Summary	Response	Outcome
	<p>Oxfordshire County Council Property and Estates Team also considers the requirement for re-provision of the Green/Blue infrastructure onsite to be overall onerous and should be removed to promote a greater flexibility that would promote sustainable development.</p> <p>Environment Team – Countryside Access</p> <p>There is no reference in this Local Plan to public rights of way, although there is an occasional reference to footpaths.</p> <p>Within the City area and vicinity there are numerous full public rights of way - and they need protection and enhancement and new links by means of unambiguous policies set out in the Plan.</p> <p>NPPF paragraph 100 states that 'planning policies and decisions should protect and</p>	<p>It is important to replace GI/ BI that needs to be re-provided close to where it was lost. We are not proposing to change this part of the policy.</p> <p>The County Council already includes an online resource for PROW/ footpaths etc.</p> <p>PROW are already protected through existing legislation (e.g., Countryside and Rights of Way Act 2000, Rights of Way Act</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.	<p>1990, etc). As such these do not need additional policy protection through the Local Plan.</p> <p>Known footpath/ rights of way enhancements required to mitigate the impacts of development proposed through the Local Plan should be set out in the IDP, relevant site allocation or area of focus policies.</p>	No Action Required

All Public Responses – Draft Policy G2

Please tell us what you think about policy on Policy Option Set 005b (draft policy G2):
Enhancement and provision of new green infrastructure features.

There were 177 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	87	27.71%
Agree with Preferred Option	60	19.11%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	7	2.23%
Do not know	1	0.32%
Not Answered	137	43.63%

Draft policy	Topic	Summary of comments	Response
G2	Support for preferred option	This could provide desperately needed green infrastructure links and their health and environmental benefits for the City, its quality of life, nature recovery etc.	Support is noted and welcomed.
G2	General comment	To balance new developments with green offsetting carbon contributions.	Comment noted.
G2	Clarification	<p>The Draft Policy states that for residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required. It states that for mixed-use sites, the area of residential use should be used for that calculation.</p> <p>We request further clarification is provided, as to whether this new space should comprise hard or soft landscaping. It is assumed that by 'area', the Plan is referring to 'plot' area or building footprint, however it would be helpful for this to be clarified in the wording. It would also be helpful to clarify how to calculate in the case of buildings with non-residential ground floor uses with residential above.</p>	<p>The requirement will apply to the overall plot area.</p> <p>The type of landscaping can be a design choice, however applicants are advised to take into consideration other relevant policies to ensure they are compliant with their requirements, e.g. the Urban Greening Factor policy and the Biodiversity Net Gain policy.</p>
G2	Should be case by case basis	<p>The preferred option for Policy G2 sets out that 'For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by the residential development is required. For mixed-use sites, the area of residential use should be used for that calculation'. [We] consider that requirements for Public Open Space should be considered on a case-by-case basis, taking into</p>	<p>A case by case approach risks inconsistent application which will hamper how we monitor the effectiveness of the policy, and will not give certainty to developers or local communities on what the open space provisions</p>

Draft policy	Topic	Summary of comments	Response
		account site context and surroundings, on the basis that prescribed requirements may unintentionally suppress the quantum of housing delivery, contrary to overarching priorities for the Plan.	are. and a lack of certainty for developers on what the expectations.
G2	BBOWT	<p>Support but would like this text added: "Require green and blue infrastructure features on all new development.....Require open space as percentage of site area on larger sites and all other new development to include green and blue infrastructure features."</p> <p>For the policy to be effective we consider that clarity is required as to the definition of larger sites in order to ensure that the requirement for a percentage of site area to be open space is delivered. We would suggest that what is currently defined as major development (e.g. larger than 10 houses or equivalent) would define larger sites, and that 50% should be green space. A significant proportion of this green space should be nature rich, with some of it on sites larger than 1 hectare defined as nature reserve, with no access or managed access.</p>	The policy will include a residential development site size threshold for which there will be a mandatory requirement for on site open space provision.
G2	General comment	Ok but only for academic and commercial. Housing the priority for development.	Comment noted.
G2	General comment	The problem is untrammelled development. Tokenistic inclusion of 'blue and green	Comment noted.

Draft policy	Topic	Summary of comments	Response
		infrastructure features' does not compensate for the loss of actual, functioning green spaces.	
G2	General comment	Much as I like the intent and idea here, I think we're deceiving ourselves if we take the approach that development won't have an overall deleterious environmental effect for the city, but we need to choose to do it anyway.	Comment noted.
G2	General comment	New developments take ages for vegetation to mature. Co2 absorption is so much more efficient with mature trees. Stop chopping down mature trees!!	Comment noted.
G2	Support for alternative option	Specific quality standards should be adopted as referred to in Alternative Option 1	Using a target such as described in Alternative Option 1 would not necessarily be effective as greenspace may not be evenly distributed, located close to centres of population, accessible, or of quality. Work on the Local Plan 2036 also identified the challenge of managing the provision of open space at a fixed ratio to population in Oxford as most developments are on small sites. It is therefore considered more effective to measure and provide

Draft policy	Topic	Summary of comments	Response
			greenspaces on a more localised basis.
G2	Support preferred option	Support the option but disagree that green features on sites can be designed in ways that allow them to perform multiple benefits for the local area particularly biodiversity. Biodiversity and human recreation never go together – overly used areas for recreation do not allow biodiversity to persist – trampling etc destroy habitat. Examples include hay meadows of New Marston Meadows SSSI; King Georges Field,	The requirement applies to provision on new development. We agree that multifunctionality works best if the uses are complementary and appropriate for the type of development.
G2	Policy requirements detrimental to development	Mandating bespoke green- and blue-infrastructure features for every development—on top of the Urban Greening Factor, biodiversity-net-gain rules and existing open-space levies—adds yet another cost layer that will either shrink site capacity or push build prices higher, eroding housing affordability. A rigid percentage of land for new open space on larger plots may look benign, but in a city where land trades at £5-10 million per hectare it effectively taxes every flat and lab bench, slowing supply and undermining the very climate goals it claims to serve. Oxford already benefits from extensive riverside corridors and historic parks; incremental, market-led greening (roof terraces, pocket gardens, tree-lined streets) will emerge where it enhances value without the need for another prescriptive policy.	The requirement for public open space is very carefully defined. It is particularly important in a densely packed city (where a lot of open space is not public) that, at the same time, there is access to open space. It is also important that the open space is of a sufficient size to be useable. Therefore, only the largest sites will be required to provide this. These sites themselves are generating new demand. It has been viability tested.

Draft policy	Topic	Summary of comments	Response
G2	Focus on minimizing impermeable surfaces	<p>An important focus should be on the need for permeable surfaces and minimisation of impermeable surfaces which is very important for water management/flood risk management and can contribute to greening/bluining. 'The potential for these benefits is lost if there is an overuse of artificial, impermeable surfacing materials like concrete, artificial lawns and tarmac.'</p> <p>This needs to be explicitly specified for all proposed developments subject to planning applications and consideration given to use of impermeable surfaces in areas such as domestic front and back gardens</p>	The policy approach is addressed in policy G3 (Urban Greening Factor).
G2	Increase thresholds for minimum greenspace requirements	<p>We welcome the holistic factors in this list of enhancements to the GI and BI, and the fact that public access, connectivity and community food growing are included. We would advocate for further hierarchy or prioritisation of certain features. For example, addressing climate change should take priority over heritage and appearance. We would like to see the bankside ecological buffer zone of at least 15 metres (rather than 10 metres) to protect our essential BI.</p> <p>There should also be a sliding scale of "new public open space" so that 10% is a minimum, but with a prerequisite that in socially / green deprived areas this scale could be increased to ensure developers don't plan for too dense areas in areas already lacking in green publicly accessible areas. Denser</p>	The 10% public space requirement in larger developments is intended as a minimum and there are no impediments to going larger. A sliding scale will make it difficult to implement a consistent approach across all developments – most potential development sites in the city already tend to be small or constrained, and often in built up contexts, which would make the delivery of usable open

Draft policy	Topic	Summary of comments	Response
		areas however will be encouraged within areas with ample green public spaces.	space alongside needed development challenging.
G2	Maintenance of new GI features	We note that the developers will be responsible for maintenance of GI for only the first five years, but this should be with genuine engagement with the local community. Then there should be ongoing consultation around the maintenance of green spaces around residential/community buildings to allow for community maintenance - working alongside developers and owners (not just a legal contract in perpetuity which enforces site owners to take the most "efficient" management actions)	Maintenance and management plans are expected to be organised as part of the design/construction process at as early a stage as possible. There is scope in the policy for different options to be considered depending on the context of the application, including community stewardship arrangements where practical.
G2	Provision for Recreation	The "Raising the healthiest generation in history report" (RHGIH 2024) quotes MP Natalie Elphicke saying "[The NPPF] lists bats. Why are we not listing children?" It recommends that "any child-friendly approach should set out clear 'quality asks' and not create vague principles that add barriers to development and house building." But the draft plan doesn't even create vague principles. The only time that the recreational needs of children/youth (apart from in the contexts of private gardens and LTNs) are specifically addressed is in Figure 4.2. which deals with mitigation of loss. Recreation is an	Recreation for all ages and abilities is one of the multifunctional benefits of green spaces identified in the plan. The wording of the policy and supporting text will reflect this. Where there are statutory requirements for development, particularly with established assessment tools and metrics, they will

Draft policy	Topic	Summary of comments	Response
		<p>afterthought. The recommendation is that “the provision of green and blue infrastructure are considered at the earliest stage in the design process” to offer “multi-functional benefits” which include health and wellbeing. But “the priority” is wildlife and flora, rather than recreation. When listing the range of factors used to determine the quality of GI the recommendation is that the “potential for recreation and movement should also be considered.” Recreation shouldn’t be lumped in with green infrastructure. The list of “tools and metrics” to inform assessments of existing GI includes the British Standards for Trees, but for recreation there is a recommendation that “a mixture of play features for young people will enhance wellbeing – these spaces do not have to be overly designed or dominated by fixed equipment, but could also be comprised of wild areas and facilities that encourage engagement with nature and free-play.”</p>	be the basis for monitoring the effectiveness of the policies.
G2	Strengthening tree policy	Welcome the mention of trees in point d). Suggest strengthening the policy with additional reference to the Local Nature Recovery Strategy.	Comment noted.
G2	Disagree with preferred option	Because space is at a premium in Oxford, the draft plan proposes that GI should be able to “perform multiple roles that support the sustainability of a development and its occupants.” This makes sense, but it does not make sense for multifunctionality to be the driving force. The 2022	Multifunctionality does not preclude a space from having a primary function. It allows the plan to recognise and cater for spaces that have additional functions

Draft policy	Topic	Summary of comments	Response
		<p>GI study picked out Bertie Park as a small, multifunctional park, but its primary function is recreation.</p> <p>The draft says “Where new open space is provided, the type of provision should be tailored to address existing needs or deficiencies in access locally.” For larger applications with public open space provision, the suggestion is that engagement with the local community will help inform the type of space needed. For smaller applications it is unclear. But most consultation carried out by OCC is a waste of money. Many feel strongly about local issues, but few want to fill in forms either online or on paper. Many believe that it will make no difference.</p> <p>The draft policy states “In situations where the proposal relates to replacement provision that is mitigating losses elsewhere, this will need to be demonstrated to be equally or more accessible for people of all ages and abilities by walking, cycling and public transport to local users of the existing site where relevant.” This would mean that councils would never be able to restrict access on sites where joy riding has been a problem, or access to bicycles where footpaths are not suitable for dual use, or include features to prevent escape of livestock. It would therefore be helpful to</p>	<p>such as biodiversity value, flood storage etc so that adequate policy protections can be applied where relevant.</p> <p>The planning application process includes a statutory consultation period where members of the public can make representations on a scheme. Developers are encouraged to engage with planning officers at the earliest possible stage so that any concerns are identified at the earliest opportunity, and engagement with the local community is also good practice particularly for major schemes. The format of <i>scheme specific</i> early stage consultations are decided by the developer without the involvement of planning, even with council housing company schemes. Participating in consultations</p>

Draft policy	Topic	Summary of comments	Response
		require that replacement sites do not pose any of these challenges to provision of access.	<p>is the best way to have input on the content of a scheme, particularly at an early stage.</p> <p>Accessibility in this context only means that a space can be easily reached by local residents without having to use a private car, and that it can be used by people of all ages whether or not they have a disability. It has nothing to do with facilitating criminal activity such as joyriding, allowing bicycles on footpaths, allowing livestock to roam free or removing restrictions that promote public safety.</p>
G1/ G2/ G3		<p>Local Plan 2040 para.8.66 (Reg. 19 plan) set out that there was a limited presence of GI features at ARC Oxford. This meant that it was likely to score below the minimum thresholds for green surface cover (Policy G3 – UGF (LP2040)). <i>“As such, proposals will need to ensure that an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets set out in the policy, demonstrated through</i></p>	<p>The thresholds for UGF in the plan are markedly lower than the recommended minimum contained in Natural England's GI Framework which informed this policy, in recognition of the constrained nature of development sites in Oxford. Thresholds for non-</p>

Draft policy	Topic	Summary of comments	Response
		<p><i>submission of the Urban Greening Factor assessment.”</i></p> <p>The above extract is clear recognition that the Council considers its own draft policies involving a combination of Draft Policy G1 and G3 is not deliverable at ARC Oxford. ARC consider this must be rectified by removing these sites from consideration as green spaces.</p> <p>The policy should recognise the potential for strategic sites like ARC Oxford to deliver GI holistically across multiple plots, with flexibility in how and where UGF targets are achieved.</p>	<p>residential schemes are lower still than that for residential led proposals. The intention behind the policy is to localise as much as possible the benefits that arise from the presence of natural features in development, which will be difficult to achieve if offsetting is allowed.</p>

Statutory Consultee Responses – Draft Policy G2

Sport England

Draft Policy	Summary	Response	Outcome
G2	<p>Sport England recommends that the Council completes the playing pitch strategy and then seeks to implement it without delay. The existing PPS would provide a good starting point for the City to look at current needs and start to allocate sites to meet the need for new sports facilities. An assessment for play should</p>	<p>The first draft of the quantitative analysis needed to support the Plan is expected to be completed by the Regulation 19 consultation stage.</p>	<p>No further changes proposed.</p>

Draft Policy	Summary	Response	Outcome
	<p>also be considered. Paragraph 103 of the NPPF states that; 'planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.' Simply providing hectares of green space is insufficient and ignores all the many types of open space that should be provided. The Council should also update its strategy for built sports provision.</p>		

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
Policy G2 Enhancement and provision of new GI and BI	<p>Landscape and Nature Recovery – Biodiversity</p> <p>When providing new public open space as a replacement for losses elsewhere (page 72), it may be helpful to refer to the requirement for biodiversity to be considered and a net gain to be delivered.</p>	<p>Policy G4 relates to how Oxford will deliver mandatory BNG.</p>	No Action Required

Draft Policy	Summary	Response	Outcome
	<p>The maintenance and management arrangements (page 73) also link to biodiversity net gain. It may be useful to clarify that the management period of 5 years would be a minimum with longer encouraged and if BNG is being delivered a minimum of 30 years would be required.</p> <p>Landscape and Nature Recovery – Landscape</p> <p>Policy makes reference to provision of GI as a “fundamental component” in the design of new development. What is meant by a ‘fundamental component’ and how will this be assessed? This section would benefit from more detail. Should this policy include a link to the design code in Appendix 1?</p> <p>Urban settings can be challenging environments for new planting and the right species choice and ongoing management are very important. The principle of the</p>	<p>BNG is discussed in full in Policy G4.</p> <p>Fundamental component – it will be for the decision-maker to determine what makes up a fundamental component when coming to their decision on planning applications.</p> <p>Assessment: The policy sets out that features should be highlighted clearly within the Design and Access Statement (where required) and/ or on landscape/ elevation plans...</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>right tree in the right place should be applied and reflected in the policy.</p> <p>Larger growing trees that are suitable for the local conditions should be chosen where space permits as these have the potential to offer greater environmental and visual benefits than small trees in the long-term.</p> <p>The Local Plan does not appear to set a target for tree canopy cover. Consideration should be given to whether this should be included in this policy or one of the other green infrastructure policies.</p> <p>Public Health</p>	<p>The principle of the right tree in the right place is already included with the Council's Urban Forest Strategy.</p> <p>Noted.</p> <p>We can consider the inclusion of a canopy cover target within the plan.</p>	<p>No Action Required</p> <p>Oxford City Action: Consider further whether to include a canopy cover target in the plan</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>Point e) should go further and implore the developer to consider how GI can be used to provide shade in relation to key urban realm features such as benches, gathering spaces and residential frontages.</p> <p>Point i) refers to community growing space but as per our previous consultation comments, this should also have its own standalone policy.</p> <p>Environment team – Countryside Access</p> <p>Further to our comment on Policy G1, there is also a need to provide for new public rights of way, and that should be referred to in Policy G2.</p> <p>Innovation Hub</p>	<p>This is already covered in the context of “urban cooling”, which is specifically mentioned in the policy</p> <p>We do not consider that community food growing warrants its own policy as it is already covered elsewhere in the plan (e.g., Green and Biodiverse city – objective 4; Policy HD13 – outdoor amenity space, Appendix 1: Design Checklist, section N2 and other metrics including UGF).</p> <p>Any new routes should be identified through the IDP</p>	<p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>Innovative green infrastructure such as moss/green walls or shelters, green roofs etc should also be considered within this policy. Smart green roofs can provide an approach for climate change adaptation by collecting flood water and providing a cooling function in heatwaves.</p> <p>Urban Design (Placemaking)</p> <p>Paragraph 4.7 should include a reference to green and blue infrastructure being used to form place identity, in addition to health, wellbeing and environmental benefits.</p> <p>In relation to higher density areas/taller buildings, vertical green should be considered. Could more be said on this as this is a significant issue particularly in the city centre? (e.g., in paragraph 4.8)</p> <p>'Larger developments will be expected to include on-site public open space such as small parks...' Play should not just be confined to a playground, other play elements (play on the way, play affordances) can easily be</p>	<p>Noted – Green roofs considered within Policy G8: SuDS.</p> <p>We will consider whether this is the appropriate place to discuss these issues.</p> <p>Green roofs/ walls are considered under Policy G8: SuDs.</p>	<p>Oxford City Action: Consider whether G2 is right place for these issues.</p> <p>No Action Required</p> <p>No Action Required</p> <p>No Action Required</p>

Draft Policy	Summary	Response	Outcome
	<p>incorporated into developments where appropriate, e.g. Giant boulders instead of bollards, or undulating grass/hills rather than perfectly flat, building ledges or boundary treatments to offer seating or an affordance to balance, climb, jump from etc. (Paragraph 4.8)</p> <p>Greening should be structurally diverse (by type, e.g. low-level planting to bushes to trees), not just by species. Developers should also be expected to assess existing green infrastructure and identify where and how their site can strengthen the green network by creating new 'patches' or connecting with existing corridors.</p> <p>Where there are watercourses, greening should still be considered in relation to improving water quality. Greening can be used as natural filter for surface runoff which may otherwise be polluting the blue network. Could be point 'k' in policy.</p>	<p>Agreed however, ensuring the delivery of small parks to support new developments is also important. The other measures would benefit from inclusion within a public realm/ landscaping strategies for the city rather than in a policy providing new public open space.</p> <p>Noted.</p> <p>Plan includes a bespoke water quality policy – R5 and the “natural” filtering of water occurs through SuDS (Policy R8)</p>	

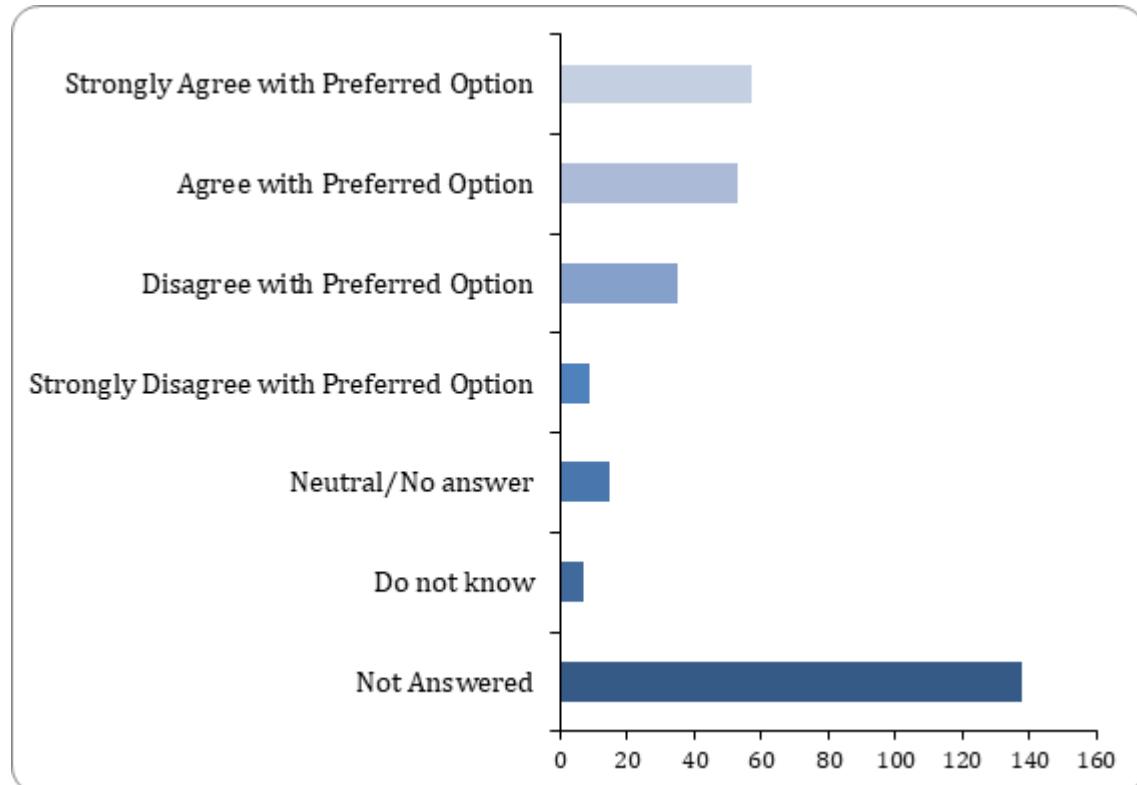
Draft Policy	Summary	Response	Outcome
G2	<p>Encourage the Council to refer to the scope for new green and blue features to enhance the significance of heritage assets in Oxford and enable that significance to be better appreciated. Reference to setting of assets is also merited. This would help explain criterion G.</p>	<p>The policy sets out a number of functions that could be targeted including enhancing the historic environment. To expand on all of these points in supporting text could make it very long, particularly as the key message is that multi-functionality should inform the design process. We will consider whether additional detail is needed in the accompanying Technical Advice Note.</p>	<p>No further action at this time.</p>

All Public Responses – Draft Policy G3

Urban Greening Factor

Please tell us what you think about Policy Options Set 005c (draft policy G3): Urban Greening Factor.

There were 176 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	57	18.15%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	35	11.15%
Strongly Disagree with Preferred Option	9	2.87%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	138	43.95%

Draft policy	Topic	Summary of comments	Response
G3	BBOWT support alternative option 1	Whilst we support the preferred option we consider that to be most effective it needs to apply to the vast majority of developments. Our preference is for “Alternative Option 1: The scale of application of the UGF tool could be mandatory across all developments in the city.”	The support for use of the UGF tool is welcomed. We consider the threshold for requirement proportionate.
G3	Object – Doesn't align with NPPF	<p>It is requested that this policy be deleted. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). The incorporation of draft policy G3 will result in an unnecessary additional policy hurdle when the protection of green spaces and achieving net gains in biodiversity can be already achieved under draft Policies G1, G2, G4 and G5. It is recognised that the provision of new green spaces as part of development proposals is constrained. However, this requirement puts significant pressure on applicants which have limited site areas and which have certain functions that also need to be achieved in those spaces. The use of the policy to prevent the loss of space would essentially sterilise the potential for development which, if allowed, could achieve wider benefits such as the release of general housing back into the market. For example, at Oxford North, where the site was</p>	<p>The UGF is a tool intended to ensure new developments incorporate a good level of greening, which has a variety of positive impacts. The measures proposed to achieve this requirement may overlap with requirements for protection and BNG, but for example even where BNG is off site there should still be green infrastructure on the site, and this may be part of protecting and enhancing existing but in some cases there will be no or little existing and there are benefits to it being introduced. The measures needed by the policy have been broadly tested on the site allocations and are achievable. A whole range of creative options are available that have limited impacts on the</p>

Draft policy	Topic	Summary of comments	Response
		greenfield land it would be impossible to recover this position through other greening features. As such the criteria to have “no reduction in baseline score” is unlikely to be achievable and the criteria should be deleted. It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a ‘simpler’ output. However, it is questioned why this additional layer of calculation is required as where it has been introduced elsewhere (mainly in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.	development space, and developments without green features will not create good or attractive places that people want to work or live in. A tweak has been made to the policy regarding the baseline score on green sites, to make it more achievable.
G3	Support – Suggest amendment	It is welcomed that the updated draft policy wording provides further information on the expectation with regard to the green coverage in new developments. The draft policy states that major development proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of 0.3 for residential or predominantly residential schemes. We request that the policy wording is adjusted to make clear that this is a target rather than minimum.	The scores contained in the policy are intended to be a minimum. The required score has been set at the level it has, to encourage as much as possible the achievability of application for constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework.
G3	Object – Not justified	It is recognised that the provision of new green spaces as part of development proposals is constrained however, this requirement puts significant pressure on applicants who have limited	The required score has been set at the level it has, to encourage as much as possible the achievability of application for

Draft policy	Topic	Summary of comments	Response
		<p>site areas and who have certain functions that also need to be achieved in those spaces. Mansfield College may seek to expand the provision of student accommodation on the campus and this may involve the loss of some of the current green space to enable this to happen. The use of the policy to prevent the loss of space would essentially sterilise the potential for development at the site which, if allowed, could achieve wider benefits such as the release of general housing back into the market.</p> <p>It is noted that the Urban Greening Factor works alongside biodiversity net gain but provides a 'simpler' output. It is questioned why this additional layer of calculations is required as where it has been introduced elsewhere this tends to have been prior to the introduction of the minimum net gain requirements of Local Plans. It is considered that this policy is not fully justified nor does it allow any scope for flexibility where circumstances indicate that it would sterilise development.</p>	<p>constrained sites with limited developable areas. It is markedly lower than the recommended minimum in the Natural England Green Infrastructure Framework.</p> <p>The UGF methodology is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features including climate adaptation, mental and physical health and wellbeing and biodiversity.</p>
G3	Doubt about viability/achievability	Concern about investment needed for ecological expertise which the Council probably doesn't have	The tool is an online system/software which doesn't

Draft policy	Topic	Summary of comments	Response
		or big enough team to do this. It would only become plausible with the development of a fundable budget to cover it.	require advanced technical knowledge. UGF can be completed through tools such as excel and google earth so not overly expensive
G3	Object – concern about misuse and undermining BNG	UGF is a blunt tool that is open to misuse and can in certain circumstances conflict with others such as BNG. I would want it to be subordinate to BNG and/or open space standards	The policy states UGF is to be used alongside BNG
G3	Support – thinks could go further	Suggested deeper more comprehensive ecological surveys before larger developments Greening should be along boundaries to mitigate climate change	
G3	No policy, leave to national policy	The extra level of complexity for a constrained city that needs to prioritise brownfield, leave to national policy of 10%	The biodiversity net gain requirement does align with national policy. The UGF is a separate requirement, which is particularly important in a constrained city, where biodiversity net gain may be off site, to ensure sites incorporate green infrastructure with its many benefits.
G3	Suggested wording	We welcome the use of the “Urban Greening Factor (UGF) with particular attention on the naturalness of surface cover with particular emphasis on natural coverage.” However, the target baseline score seems low in ambition.	The target scores have been tested and represent an achievable and good level of greening.

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> • 0.3 for residential or predominantly residential schemes • 0.2 for predominantly non-residential schemes <p>Is too low as a baseline score. We would encourage others to read Natural England report: Urban Greening Factor for England – Development and Technical Analysis - NERR132 This report highlights that the average target is 0.4 (40%)= residential 0.5 =greenbelt 0.3 = non-residential. We would recommend these levels to be the minimums for Oxford. The aim to get a local average of higher than these, such as Helsinki with 0.8 We would also like to see a sliding scale with lower socio-economic areas specifically highlighted as a higher target, such as a maximum minimum in the most deprived areas = 0.7.</p>	

Statutory Consultee Responses – Draft Policy G3

Oxfordshire County Council

Draft Policy	Summary	Response	Outcome
Policy G3	Landscape and Nature Recovery – Biodiversity / Landscape		

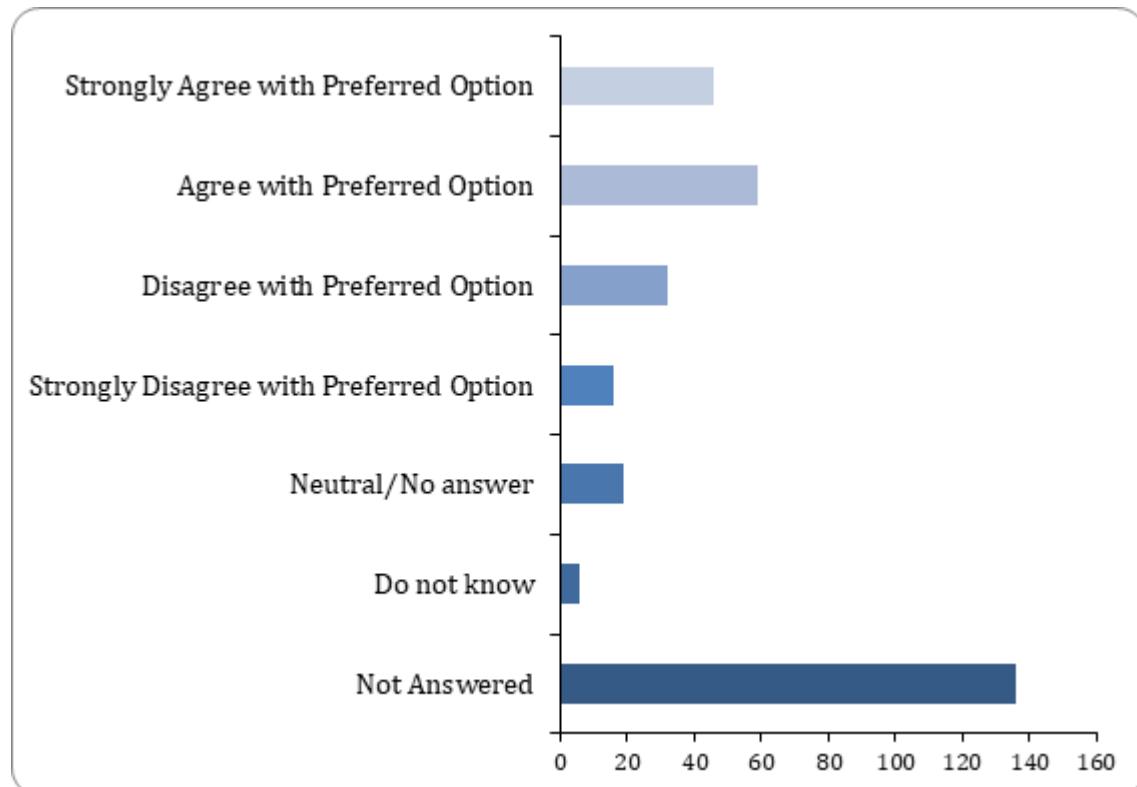
Provision of new green and blue features – UGF	<p>UGF is not mandatory for all developments. However, we wonder whether greatest green infrastructure benefits could be achieved if it was mandatory for all developments, especially if located in areas of existing GI deficiency unless particular circumstances and reasoning are demonstrated.</p> <p>Major development should be defined.</p> <p>The application of UGF for non-major developments should be considered here as a way for smaller developments to demonstrate a measurable net gain in biodiversity to satisfy NPPF and local planning policy when they are exempt from the mandatory BNG requirement.</p>	<p>It is a requirement for larger developments and encouraged on smaller ones. Larger (major) developments can offer the most scope for a wide variety of improvements.</p> <p>Major development is defined in the NPPF (10 or more homes or 1,000 sqm non-residential floorspace).</p> <p>Policy already encourages smaller (minors/householders) to apply the UGF.</p>	No Action Required No Action Required No Action Required
--	---	--	--

All public Responses – Draft policy G4

BNG

Please tell us what you think about Policy Options Set 005d (draft policy G4): Delivering Mandatory Net Gains in Biodiversity.

There were 178 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	59	18.79%
Disagree with Preferred Option	32	10.19%
Strongly Disagree with Preferred Option	16	5.10%
Neutral/No answer	19	6.05%
Do not know	6	1.91%
Not Answered	136	43.31%

Draft policy	Topic	Summary of comments	Response
G4	Support	<p>Agree with the preferred option of draft policy G4 to align with the statutory net gain requirements under the Environment Act (2021) to deliver 10% net gain and to follow the hierarchy of prioritising delivery of net gains onsite and where this is not feasible, delivery off site.</p> <p>If landowners/developers are able to achieve more, that is still possible and strongly encouraged under such as policy approach. there is no evidence for a policy which requires biodiversity net gains greater than 10%.</p>	The support is welcomed.
G4	Potential legislation changes for small sites	<p>The City Council will be aware of proposals under consultation by the Government to remove the 10% requirement for small and medium sized sites. Draft Policy G4 will need to evolve to reflect any changes to legislation in this regard</p>	Comment noted.
G4	Unnecessary	<p>This draft policy repeats national requirements and is therefore unnecessary and should be deleted.</p>	<p>The requirement is set out nationally, but the policy adds additional local context about how it is implemented.</p>
G4	BBOWT	<p>Whilst we welcome the hierarchy set out and hence we have ticked “Agree with preferred option”, we consider that the alternative option of seeking greater than 10% net gain should be taken forward, in addition to the hierarchy as set out in the preferred option. We recommend 20% net gain is sought. This is supported by the work done by the Oxfordshire LNP</p> <p>https://www.olnp.org.uk/lnp-projects/advocating-</p>	

Draft policy	Topic	Summary of comments	Response
		<p>for-20-biodiversity-net-gain-bng . In addition all the other District level authorities in Oxfordshire are taking forward Local Plans asking for above 10% in one way or another, for example a standard 20%, or 20% on major development. We consider that there is equally justification for 20% to be sought within Oxford City as anywhere else in Oxfordshire and that 20% should be sought. BBOWT also recommends that content is included within a net gain in biodiversity policy to ensure that all habitat retained, enhanced or created (whether it is on-site or off-site) for the purpose of achieving both no net loss, and net gain, is retained forever (e.g. in perpetuity - for at least 125 years). Otherwise, the no net loss or net gain merely becomes a temporary net gain, and ultimately over time development will result in a large net loss to biodiversity.</p>	
G4	Mechanism for offsite payment	Should establish a mechanism and or policy for such off-site delivery of BNG to be achieved by financial transfers to local environmental charities e.g. BBOWT and Earth Trust.	This mechanism is not in place and can't be managed by Planning.
G4	Monitoring	Onsite and offsite BNG should be monitored with a clear maintenance plan for onsite BNG.	
G4	Offsite land which is recipient of BNG should be exempt from development	Where BNG is delivered offsite according to the hierarchy, the recipient green space should henceforth NOT be considered for development for a minimum of 30 years in line with the BNG requirement.	

Draft policy	Topic	Summary of comments	Response
G4	There should be no hierarchy to work through- straight to offsite is fine	Every extra rung on the ladder before buying statutory credits adds transaction costs, legal complexity and delay- especially in a land-scarce city where suitable receptor sites are rare. This squeezes viability. The DEFRA metric and credit market guarantee ecological uplift already, so this approach has no measurable gains.	There are opportunities within Oxford, and it is considered important that the policy ensure these opportunities are taken where possible.
G4	Should be onsite	Proposals should be modified to ensure net gain is onsite. It can be very creative, such as a roof garden. If it can't be achieved, the site is unsustainable.	The requirement is simply not feasible to provide onsite on the majority of the constrained sites in Oxford, however creative the solutions are.
G4	Exceed 10%	Cambridge and other development-stressed LPAs have done this, why not Oxford? 20% better covers the large margin of error in BNG.	It is now required that exceeding the 10% requirement is robustly justified, with reasoning that we think it would be difficult to apply in Oxford.
G4	Comment on uses it applies to	Comment that it should not apply to housing, to encourage housing. Comment that it may be difficult on industrial sites.	The basic requirement, including what it applies to, is set nationally.
G4 and G5	Objection	Must include provision for where the habitat is NOT swappable, it is not permitted.	Comment noted.

Statutory Consultee Responses – Draft Policy G4

Sports England

Draft Policy	Summary	Response	Outcome
G4	For information, Sport England has recently published guidance on biodiversity net gain to help show how biodiversity measures can be incorporated into playing fields without compromising their intended sporting use or long-term protection. https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNG#:~:text=About%20the%20guidance,10%25%20net%20increase%20in%20biodiversity.	Comments noted.	No further changes proposed.

Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
Policy G4 Delivering mandatory BNG	<p>Landscape and Nature Recovery – Biodiversity</p> <p>A BNG of 20% is encouraged in line with other emerging local plans in Oxfordshire.</p> <p>It is recommended that prioritisation should be given to delivering ecological habitat enhancement and creation within ecological networks at county level over delivering habitat enhancement and creation outside of ecological networks within Oxford city outside of the LNRS.</p>	<p>Oxford is a small, constrained city with limited opportunities to deliver the mandatory 10% net gains. Increasing the requirement to 20% would not result in more biodiversity net gain in the city but rather an increase in delivery outside of Oxford. District Plans already propose 20% BNG across Oxfordshire. It is important that BNG impacts are received locally.</p> <p>Noted.</p>	<p>No Action Required</p> <p>No Action Required</p>

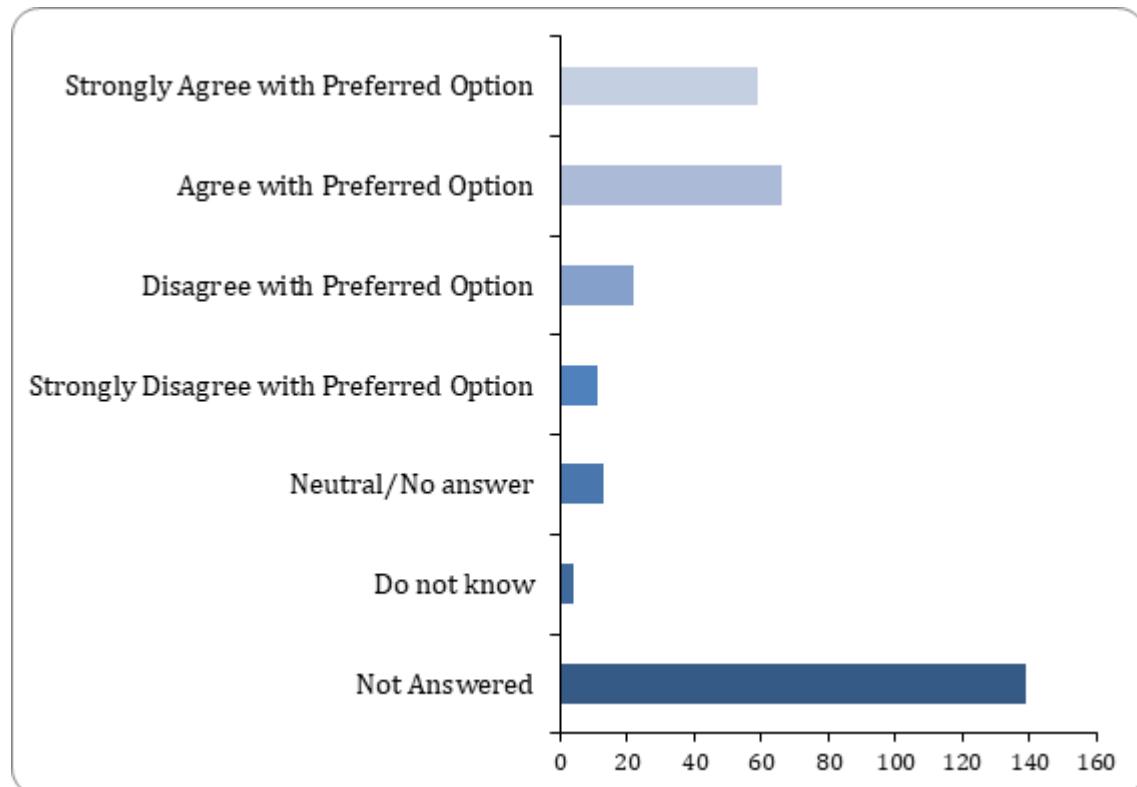
Draft Policy	Summary of comment	Response	Outcome
	<p>Encouragement should also be given to using offsite offset areas outside of ecological networks within Oxfordshire as a step before considering sites further afield. It is considered that this approach would be more aligned to the Local Nature Recovery Strategy (LNRS) once published.</p> <p>The encouragement of delivering more technically offsite difficult habitats that may deliver lower BNG units (due to the application of the difficulty multiplier within the metric) where feasible is welcomed and this approach should also be considered for onsite habitats where feasible.</p> <p>Public Health</p> <p>We concur with the Landscape and Nature Recovery Team that we'd want to see a BNG minimum net gain of 20%.</p>	<p>See response above.</p>	<p>No Action Required</p> <p>No Action Required</p>

All Public Responses – Draft Policy G5

Onsite biodiversity

Please tell us what you think about Policy Options Set 005e (draft policy G5): Protecting and enhancing onsite biodiversity

There were 175 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	59	18.79%
Agree with Preferred Option	66	21.02%
Disagree with Preferred Option	22	7.01%
Strongly Disagree with Preferred Option	11	3.50%
Neutral/No answer	13	4.14%
Do not know	4	1.27%
Not Answered	139	44.27%

Draft policy	Topic	Summary of comments	Response
G5	Support	It is important to take all opportunities for enhancement (some mentioning there should be more mention of trees).	The support is welcomed.
G5	Superfluous, do not have policy	<p>It is considered superfluous to impose additional prescriptive requirements, in addition to mandatory Biodiversity Net Gain, on all sites. It may be more appropriate to impose such prescriptive measures only on sites where BNG is provided offsite, to ensure a degree of support for wildlife is still provided on-site in these circumstances.</p> <p>The requirement duplicates other requirements and adds consultant fees and squeezes value.</p>	Whilst there are overlaps between several policies, they do also all have a slightly different purpose and function. It will generally be the case that features designed-in in response to one policy will also help meet the requirements of another policy.
G5	Support alternative option	Prefer option 1, 2 or 3	Noted
G5	Local Nature Recovery Strategy	<p>The Local Nature Recovery Strategy (LNRS) has yet to be published, and this should be acknowledged within the Plan. A further stage of consultation should be undertaken to include LNRS guidance.</p> <p>Failing this, it should be stated that this Plan will adhere to guidance from the LNRS when available.</p> <p>All green spaces should be protected and there should not be a hierarchy.</p>	The LNRS is in the process of being finalised and will be adhered to.
G5	Not enough or strong enough	<p>What is more important is protecting existing. If wildlife and habitats are destroyed they can't be replaced. Bird and bat boxes are not biodiversity.</p> <p>Ecologists should be required, not just encouraged.</p>	Other policies do also protect existing green infrastructure.

Draft policy	Topic	Summary of comments	Response
G5	More flexibility needed.	<p>Alternative option 1 is preferable. There should be flexibility for design solutions that recognise site-specific conditions and challenges in greening certain constrained sites (e.g. brownfield industrial).</p> <p>If it must be tick box, then there should be space for designers to incorporate their own nature-inspired ideas. It must be customisable to fit what's appropriate to the surroundings.</p>	The policy does have flexibility as there is no prescriptive use of any particular measure, and measures appropriate to the site can be selected.
G5	BBOWT	BBOWT strongly welcome the inclusion of this policy, and the preferred option.	Support welcomed.
G5	Viability	It is unclear how these requirements are factored into viability testing.	Whole plan viability testing has taken place, which includes all policies with a potential 'cost' implication.
G5	Suggested amendment	<p>CPRE recommend that on-site biodiversity enhancements be made mandatory for all developments, regardless of whether BNG has been delivered on-site or not.</p> <p>We also propose that the wording in the following sentence be strengthened by replacing "should seek to" with "must":</p> <p>"All extensions and new-build development <u>must</u> incorporate ecological enhancements into landscaping or building facades/roof spaces, tailored to the priority habitats and protected</p>	This is the intention of the Policy G5. Comment is noted.

Draft policy	Topic	Summary of comments	Response
		<p>species present within the site and surrounding area.”</p> <p>Regarding the sentence: “Seeking advice from a suitably qualified ecologist on the ecological enhancements selected is encouraged,” we suggest clarifying that such advice is required only for minor and major developments. Requiring this for household extensions could create unnecessary barriers for homeowners.</p>	
G5	These aspects should not contribute to BNG or mitigation	<ul style="list-style-type: none"> • Tree planting should not be judged as contributing towards BNG especially young trees which easily die and decay without maintenance, releasing carbon • Bird and bat boxes – maintenance issues and are unlikely to be used • Green roofs – maintenance issues 	Regulations around BNG are separate.
G5	Should not apply to extensions	<p>Do not disagree with the principle of Draft Policy G5. However, greater clarification should be provided that the provisions relate to new builds and not conversions of buildings.</p>	This is considered to be clear.

Statutory Consultee Responses – Draft Policy G5

Oxfordshire County Council

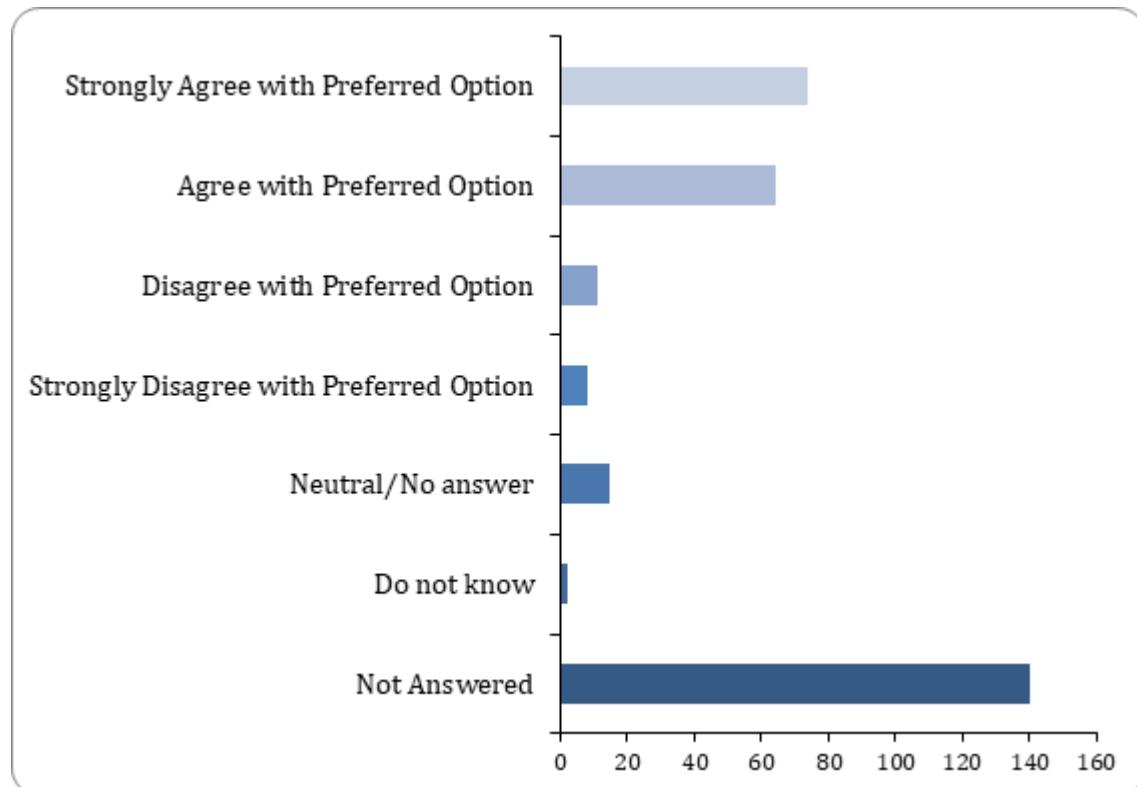
Draft Policy	Summary of comments	Response	Outcome
Policy G5 Enhancing onsite biodiversity in Oxford	<p>Landscape and Nature Recovery – Biodiversity</p> <p>Could strengthen requirement to include an element of native planting. Suggested amendment:</p> <p><i>'Planting should be designed to maximise the biodiversity value as far as possible while still delivering other functions where needed'.</i></p> <p>It would be useful to define what species are considered invasive in the context of the policy and whether schedule 9 of the Wildlife and Countryside Act 1981 is referred to.</p>	<p>We can consider whether to include this amendment going forward.</p> <p>We can consider the inclusion of a reference here.</p>	<p>Oxford City Action: Consider proposed wording going forward.</p> <p>Oxford City Action: Consider proposed wording going forward.</p>

All Public Responses – Draft Policy G6

Ecological network

Please tell us what you think about the policy options set 005f (draft policy G6): Protecting Oxford's ecological network

There were 174 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	74	23.57%
Agree with Preferred Option	64	20.38%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	15	4.78%
Do not know	2	0.64%
Not Answered	140	44.59%

Draft Policy	Summary	Response	Outcome
G6	General support for aspects of policy	Welcome the inclusion of specific policy with respect to the hierarchy of sites such as SACs, SSSIs, LWSs, OCWSs, pLWSs, pOCWSs. Also welcome the inclusion of specific policy wording relating to particularly vulnerable sites such as the Lye Valley SSSI and Oxford Meadows SAC with requirements re hydrology, although feel this should go further.	The support is welcomed.
G6	Irreplaceable habitats	Strongly consider additional wording needed in relation to irreplaceable habitat. The preferred option text states: "Reiterate national guidance for how to deal with irreplaceable habitats." But we could not find text that does that, or that addresses the following text in the NPPF: "193.....c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons ⁷⁰ and a suitable compensation strategy exists;" We consider this text	The intention was to set this out in supporting text to the policy (which was not a part of the consultation), as it is not necessary to repeat national policy (which already sets strong protection for irreplaceable habitats). Whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment.

Draft Policy	Summary	Response	Outcome
		should be included as policy text in the Policy in order for the policy to be sound. We suggest that this is best placed directly after the policy in relation to SACs. Similar text has been included in the draft Local Plans of several adjoining authorities.	
G6	Priority habitats and species	Whilst we welcome the inclusion of text relating to priority habitats and species in the draft G6 policy text we do not consider it to be worded sufficiently strongly to be effective in delivering the intention of the following NPPF text: “192....b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” Alternative wording is needed and recommend the approach taken in the draft SODC/VoWHDC Local	A significant amount of priority habitat is located on land in Oxford that is protected strongly through the Ecological site designations and the Core Green Infrastructure network protections (biodiversity value was a key element that informed the Core GI network designation). Remaining areas of priority habitat are then protected through the wording highlighted in the comment. This is considered to be a proportionate and pragmatic approach which is in keeping with the NPPF.

Draft Policy	Summary	Response	Outcome
		Plan or that in the draft Cherwell DC Local Plan.	
G6	Oxford City Wildlife Corridors	<p>Oxford City wildlife corridors have played a key role in conserving wildlife within the City and their importance and role in planning should continue and be included in planning policy. We consider it vital that this latest Local Plan continues the emphasis on the importance of protecting the Oxford City wildlife corridor network, as in Policy of the Oxford Core Strategy to 2026 which stated in Policy CS12, with our underlining: “Local sites: No development should have a significant adverse effect upon a site that is designated as having local importance for nature conservation or as a wildlife corridor, save in exceptional circumstances where the importance of the development outweighs the harm, and where it is possible to compensate for the damage caused by providing adequate replacement habitat.”</p>	<p>Whilst G6 protects the designated sites, policy G1’s green infrastructure network (which also includes G6’s sites) protects a wider range of green spaces in its core designation layer. This include sites that provide a wider biodiversity function including acting as corridors, though they might not be designated. The Local Plan also emphasises the importance of protecting and enhancing linkages between green spaces through its green infrastructure policies (G1 and G2).</p>

Draft Policy	Summary	Response	Outcome
G6	Protection of Lye Valley (and other calcareous locations) not enough due to impacts on ground/surface water flows	<p>Comments flagging the vulnerabilities of Lye Valley (and other calcareous locations) from increasing development leading to reduced groundwater, and increased scouring from surface water via urban drainage.</p> <p>The current wording of G6 in relation to groundwater/surface water flows is “a very considerable weakening from the current Local Plan 2036” (Policies RE3/RE4). For instance, Lye Valley and similar areas are only mentioned in the supporting text, not the policy itself.</p>	<p>The policy sets out a framework of protection for all the SSSIs from the impacts of inappropriate development (on top of the requirements in national policy). Each SSSI is susceptible to different types of impact/adverse effect, and the key ones are set out within the policy. The policy then specifically flags that areas like Lye Valley are susceptible to impacts on groundwater/surface water flows and folds in the requirements set out previously in separate policies in Local Plan 2036. As such, we disagree that this has been weakened.</p>
G6	Policy specific to protection of lowland fen habitats the Lye Valley	<p>Whilst welcoming reference to protecting the Lye Valley in G6 – stronger requirements within a separate policy are needed. Also to ensure protection of alkaline spring-fed lowland fens found within and around the city. These lowland fen habitats are UK priority habitats, and also are irreplaceable habitats, so that the NPPF</p>	<p>National policy already sets strong protection for irreplaceable habitats which does not need to be copied in the Local Plan. Policy G6 sets a framework of protection for habitats of various types from adverse effects of development, and this would include lowland fen wherever it is found and other habitat that forms part of designated sites like the Lye Valley. However, as per earlier response, we are happy to add</p>

Draft Policy	Summary	Response	Outcome
		<p>policy on irreplaceable habitats applies to them. This habitat is exceptionally rare and cannot be recreated elsewhere as it is dependent on a combination of geology and geography with a calcareous spring-fed water source of the right quality and quantity. This occurs at only a few locations in the UK. The fens are highly vulnerable to changes in water quality and quantity which may arise from development within their catchment. They are also vulnerable to trampling damage, increases in nutrients (from dog mess and air pollution), and changes in the grazing regime (which may be inevitable due to increased recreational pressures) that may be needed at some sites to maintain the plant species that make a fen special.</p>	reference to the national requirements for development impacting irreplaceable habitats in the policy.
G6	Formal identification of calcareous emergence areas	Request formal identification of calcareous emergence areas including,	The role of the policies map, where this would need to happen, is not in identifying every type of habitat and location in the city. Other mapping resources are available for these purposes. There

Draft Policy	Summary	Response	Outcome
		but not limited to, Headington Hill and Dunstan Park, Ruskin College.	are a wide range of habitat and geological considerations which might be of relevance, not just calcareous areas. To attempt to identify all these would not only over complicate the policies map, and there may be other areas which have yet to be identified (e.g. arising from future surveys).
G6	Net gain needs to be onsite	Net gain needs to be achieved on site, not hived off to some other area which may have had a perfectly workable environmental community before then, and which may be too far away for residents to benefit from it. Net gain elsewhere is unlikely to be able to offset impacts of development on certain species e.g. loss of buildings/trees of importance for bats.	The Environment Act sets out how net gain should be approached. Policy G4 seeks to further set out our local preferences for onsite in first instance. G6 seeks to ensure impacts on existing species are appropriately addressed (e.g. following the mitigation hierarchy).
G6	Additional requirements for protecting the Lye Valley from adverse effects.	Varoius comments including: Add a statement that says: "Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley	An additional statement (or a full policy) is not considered to be necessary. Policy G6 already sets out that development would not be permitted where it would have an adverse effect on any SSSI. The policy explains that an adverse effect could include various impacts including (but not limited to) hydrological

Draft Policy	Summary	Response	Outcome
		<p>SSSI" to apply to all development, not just designated sites.</p> <p>Include a specific policy to address future issues which could impact the Lye Valley specifically, including risk of pollution from the sewer network as infrastructure ages, as well as new boreholes supporting heat networks of nearby buildings</p>	<p>impacts in relation to surface or groundwater. This requirement applies to all SSSIs including the Lye Valley and would be relevant to development anywhere within the impact risk zones that could lead to adverse effects on a SSSI like the Lye Valley. The supporting text of the policy will flag that there are particular hydrological impacts that the Lye Valley is sensitive to.</p>
G6	No further development in groundwater catchment	<p>Request an Article 4 Direction in both groundwater and surface water catchment areas of the Lye Valley to reduce cumulative impacts of redirection of water to urban drainage. SUDS are unacceptable as they will fail and require maintenance.</p>	<p>The process for implementing an article 4 direction is complex, and must be justified and proportionate. It is also a separate process to the preparation of the Local Plan. Nevertheless, with the Local Plan the Council has sought to include a range of policies for reducing surface water run-off and reducing its water quality impacts (e.g. Draft Policy G8 and R5) as well as generally increasing green surface cover on sites to mitigate impacts of urbanisation (Draft policy G3).</p>

Draft Policy	Summary	Response	Outcome
G6	All development sites should need to assess potential indirect impacts on flora and fauna	"Any planning applications near the Boundary Brook or Lye Valley/SSSI/LNR/LWS etc) will also need to assess the potential for additional indirect impacts on the flora and fauna of those area." should be a statement that applies to all development, not just particular sites.	Policy G6 sets out protection for all these types of designations and applies to any development that could have adverse effects.
G6	Policy currently excludes natural habitats	"Proposals with a reasonable likelihood of adversely impacting semi-natural habitats" requires rewriting as it excludes natural habitats.	Whilst definitions vary, semi-natural habitat is typically defined as being any wild/natural habitat that has at some point been influenced by human activity, even if this was historic. This is generally the case (to varying degrees) across the majority of the city, which is why we typically use this term. However, for completeness, we are happy to amend the reference to natural or semi-natural habitats.
G6	Protection of non-designated sites	The main priority of the Headington Neighbourhood Plan is "to conserve green space and increase public access and biodiversity". Do not believe that council is protecting important green spaces and features and requiring biodiversity	G1 protects a network of green infrastructure - core and supporting spaces as well as green features elsewhere. Equally open spaces benefit from some protection through national policy. G6 adds protection for national or local designated sites where there is particular

Draft Policy	Summary	Response	Outcome
		<p>enhancements and new green features on sites. The requirement for developers to protect non designated green spaces is too weak (i.e. it is easy for developers to justify loss by showing they have “considered the information from various sources where relevant”, or claiming “exceptional need”. All of Oxford’s remaining green spaces should be protected with a requirement to improve their quality, access, connectivity and number.</p>	<p>biodiversity importance. G6 also sets out how potential impacts on habitat or protected species (regardless of where they are located) should be addressed.</p> <p>We will try to ensure that this broader picture of protection is set out clearly in the supporting text of the Local Plan.</p>
G6	Biodiversity – suggested supporting text for biodiversity or a similar policy	Rep contains detailed wording suggestions regarding Great Crested Newt District Licence Scheme and a glossary to be added to the biodiversity policy or a similar policy.	We've reviewed the proposed wording but the level of detail goes beyond the scope of the policy and would potentially be more helpful to reference in some way through the supporting Technical Advice Note we intend to prepare to support the policy.
G6	Policy requirements for local sites	Various comments relating to the wording: <i>Where proposals result in habitat loss within a LNR or LWS, they must retain and enhance the interest</i>	Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). Local wildlife sites are protected through policy G1 as ‘core’ spaces

Draft Policy	Summary	Response	Outcome
		<p><i>features for which the site was selected.'</i></p> <p>Hard to see how this would provide any satisfactory outcomes, appears to mean that a developer can build on most of a nature reserve but retain or plant a couple of native trees to represent the site that had been lost. A few token bits of 'wildlife' cannot substitute for the loss of a whole location, its ecosystem and biodiversity.</p> <p>The protection of local sites and other green spaces must be increased, not just the legally designated sites (SSSI, SAC). The Policy should state categorically that they MUST not be either developed or harmed by any development. This is particularly important in Headington which has seen huge developments in recent years and which continues to be the location for new major developments eg the Warneford site.</p>	<p>which would prevent development on them. Policy G6 then sets out additional considerations which might apply, e.g. if development happens near by that could result in adverse effects on the functioning of these spaces.</p>

Draft Policy	Summary	Response	Outcome
G6	Local authorities should be identifying and protecting existing habitats	Several comments say that local authorities should be identifying and protecting existing habitats, not leaving it to the applicant.	The Local Plan designates a network of habitats of national, county-wide and city importance. Separate policy G1 also protects a range of green spaces because of their identified importance to nature. Policy G6 simply requires that where applicants propose development, their approach is informed by a good understanding of potential ecological interest on their site and that they respond to this accordingly.
G6	Overall wording needs to be stronger	Many comments argue the wording needs to be strengthened so that policy “requires”, instead of “seeking to ensure”.	Comments noted – the requirements in the policy vary in strength depending on which elements of the ecological network they respond and their level of designation/sensitivity.
G6	Measuring value of ecological habitats	Further clarification is needed on how to measure the value of ecological habitats for the purpose of compensation.	The level of detail this would require is not something that can be easily captured within the policy or supporting text. The policy sets the framework for what is expected, but the approach to assessing ecological value on a site in order to meet these requirements will depend on the context of the site, the potential ecological features of interest and the type of application proposed.

Draft Policy	Summary	Response	Outcome
G6	No hierarchy – all nature must be protected and green corridors encouraged	Against a hierarchy of nature as it suggests some sites are expendable if not deemed important enough. Having isolated 'special' sites is ineffective as there is a need for joined up corridors and a critical mass of these.	National policy is clear that Local Plans should identify a hierarchy of international, national and locally designated sites. The Local Plan sets out various levels of protection for nature and green infrastructure beyond just the designated sites in the hierarchy.
G6	OCWS – Rock Edge	Rock Edge SSSI is showing increasing wildlife diversity of limestone flowers due to improved management and now worthy of OCWS designation.	Noted – the site will benefit from core protection in the green infrastructure network as well as SSSI protections in national policy and policy G6.
G6	Require developers to engage with environmental charities	There should be a policy or mechanism which requires funded engagement with local environmental charities such as with the Earth Trust or Berks Bucks & Oxon Wildlife Trust. This should be enforced by the Council to protect Oxford's ecological network.	It would not be appropriate for the Local Plan policy to dictate specific groups that applicants should pay to engage with. The policy sets the framework for how existing ecology needs to be protected when proposing new development. How applicants meet the requirements will depend on context of the site and potential ecological features that may be present, as well as the type of development proposed. There is no one-size-fits-all approach. We would be happy to consider referencing local groups and expertise as part of the supporting Technical Advice Note that we

Draft Policy	Summary	Response	Outcome
			envise preparing to support the policy in future.
G6	Defer to national policy with bespoke guidance for the handful of designated locations in Oxford	A few comments would prefer to remove local policies for protecting and enhancing on site biodiversity, instead relying on national standards and policies. Multiple comments say there should be bespoke guidance for the handful of locations that face proven risks, while letting BNG and EA regimes govern the rest.	A local policy is necessary to protect the range of locally designated sites in the city which are not protected in the same way as national sites in national policy. It also allows the Council to set out particular considerations and local requirements which are tailored to the variety of habitats and species present in Oxford.
G6	Noise and light pollution	Multiple comments say the policy should explicitly include noise and night-sky light pollution.	The policy currently names 'impacts from artificial light' as a potential impact however, as stated in the policy, this list is not exhaustive.
G6	General comments re: SSSIs in city	The number of wildlife SSSIs in poor condition is bad news for the city and evidence that wildlife is not thriving in many despite the condition assessments. Natural England's condition assessments are too out of date to be useful – disagree with condition assessment for New Marston	The condition assessments from Natural England are the most current source of information available to us, though we are aware that they have not been updated for some time. The Local Plan takes a precautionary approach to the SSSIs' protection, including mitigation requirements in any site allocations within proximity to the SSSIs and general

Draft Policy	Summary	Response	Outcome
		<p>Meadows SSSI as overall favourable – no longer the case.</p> <p>Table of SSSIs should separate out the geological ones and whilst being in favourable status, this is for separate reasons to ecology.</p>	<p>requirements outlined in G6 that would apply to proposals elsewhere.</p> <p>We will try to ensure that the distinction between geological SSSIs and others is more clear when we reference them going forward.</p>
G6	General comments re: local wildlife sites in city	<p>Impression is given that all local wildlife biodiversity sites of merit and importance to the city have yet been identified and designated, but the city is far from having a full audit of wildlife rich areas and there are many with merit that are not designated (e.g. areas of Cutteslowe Park). Ecological Designation is biased towards sites the council actually owns, but there are many more designation-worthy sites in other land ownership e.g. half of Christchurch floodplain meadow; areas of calcareous alkaline spring-fen all around Headington; Ruskin College.</p>	<p>We acknowledge that there is a range of ecological potential outside of designated sites – this is why the first part of the policy sets out expectations for proposals (criteria a-c) which would apply anywhere in the city where there is a reasonable likelihood of adversely impacting semi-natural habitats or protected species.</p>
G6	Allotments	Allotments can be crucial biodiversity areas for pollinating insects, even in urban areas. They are also a key part of	Allotments are protected in the Local Plan under Policy G1 including the three examples listed.

Draft Policy	Summary	Response	Outcome
		<p>'improving the health and well-being of people' (one of the Local Plan's objectives). They provide opportunities food growing, recreation, relaxation and socialising on its open spaces. Therefore, Brasenose Farm, Fairacres and Cutteslowe allotments should be protected and not be classified as grey belt.</p>	
G6	Wildlife sites connectivity	<p>Wildlife sites within and outside the city are connected through green corridors. Support for city wildlife sites and green connectivity is not emphasised and should be. Dark zone connecting Magdalen Wood East and Magdalen Wood West is important for species movement e.g. bats and should be maintained. Green wildlife bridge across the ring road in this area is needed.</p> <p>Also flag concern that any building just outside the city limits has the potential to break/block the essential green</p>	<p>Policy G6 needs to be read in conjunction with the protection for the green infrastructure network (policy G1). We protect a much broader range of sites in the city as either core or supporting green infrastructure and part of the rationale is supporting a linked up network across the city. Policy G2's criteria also includes strengthening links between green spaces, particularly ecological sites</p>

Draft Policy	Summary	Response	Outcome
		connectivity upon which wildlife within the city depends.	
G6	Protecting Lye Valley	<ul style="list-style-type: none"> Update to all Site Policies that impact the Lye (MROFAOF, SPE7, SPE6, SPE8) Request a formal survey and policy demarcation of ground, Thames Water and surface water catchments for the Lye Valley and other areas as per Lambeth where floods have, and could potentially, cause damage. 	Policy G6 sets the framework of protection for the sites within the Lye Valley and sets out what applicants are expected to do to avoid adverse effects wherever proposals could lead to them. The specific site allocations that are located within impact risk zones for the Lye Valley will include requirements for mitigating risks also. Flood risk is dealt with through policy G7 and mapping of flood risk is included in the Strategic Flood Risk Assessment.

Statutory Consultee Responses – Draft Policy G6

Natural England

Draft Policy	Summary	Response	Outcome
G6 – protection of SAC/SSIs	<p>Welcome the commitment to safeguard key sites within Oxford's ecological network which include Oxford Meadows SAC and the numerous SSSIs.</p> <p>Encourage the Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI's and stipulate within the allocation policy</p>	<p>We are undertaking a Source Pathway Receptor Analysis for the SSSIs as well as Habitats Regulations Assessment for the SAC and this will help identify all the relevant sites that might impact on these</p>	<p>Source Pathway Receptor Analysis and HRA work to be published alongside Reg 19 consultation. Key findings will be reflected in relevant allocations including site-specific mitigation</p>

Draft Policy	Summary	Response	Outcome
	that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.	designations, in line with your comment. We will ensure any recommendations from that work, including site-specific mitigation requirements, are reflected in the relevant allocation policies.	requirements where necessary.
G6 – Irreplaceable and priority habitats	Encourage the Council to be ambitious in terms of the protection, enhancement and strengthening of the ecological network and suggest that you include a commitment to the protection of irreplaceable habitats and priority habitats such as lowland fen, within the policy wording.	See our other response re: priority habitats. In relation to irreplaceable habitats, whilst we would contend that it is not necessary for the policy to repeat national policy, we have however incorporated an amendment into the policy wording in response to this comment (and others).	Policy updated for Reg 19.
G6 - LNRS	Encourage the Council to consider the Oxfordshire Nature Recovery Network and emerging Oxfordshire Local Nature Recovery Strategy. LNRSs have been designed to help local planning authorities deliver existing policy on conserving and enhancing biodiversity and to reflect this in the land use plans for their area. Given that national guidance on LNRSs and their	The Council has sought to ensure the LNRS is reflected in several ways through the Local Plan. We have included specific references to it and the opportunities it identifies within certain site allocations, and have made sure the offsite BNG	No further action proposed at present.

Draft Policy	Summary	Response	Outcome
	<p>relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.</p>	<p>hierarchy references LNRS areas within its steps where onsite BNG is not feasible.</p> <p>Policy G6 protects designated sites which are identified as having existing importance in the LNRS, meanwhile policy G1 protects a network of green spaces, many of which are also opportunity areas for enhancement identified in the LNRS.</p>	

Sports England

Draft Policy	Summary	Response	Outcome
G6	<p>Sport England is concerned about what this policy means for any playing fields or other sports facilities within these designated areas. It is not unusual for grass pitches to be located next to or within local wildlife sites (or similar designations). With reference to the playing pitch strategy and other</p>	<p>The policy relates to mitigating adverse impacts or additional pressures to designated sites that may arise as a result of new development. There are unlikely to be locations where there are permitted established uses that are incompatible with the sensitivities to designated sites.</p>	<p>No further changes proposed.</p>

Draft Policy	Summary	Response	Outcome
	<p>documents that record playing fields and recreation facilities the Council must carefully balance any new policies that could prevent Oxford's residents from enjoying the outdoors and keeping physically active. Often natural areas can benefit humans and nature so encouraging policies that support but must be given appropriate consideration in an urban environment.</p>		

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy G6 Protecting Oxford's biodiversity	<p>Strategic Planning</p> <p>The Oxford Meadows Special Area of Conservation is the largest SAC in the county and much of it lies within Oxford City's boundary. This SAC, together with Sites of Special Scientific Interest and areas identified as at risk of flooding cover much of the other undeveloped land in the City, and therefore these issues are very significant in the Oxford City context. This policy</p>	Noted.	No Action Required

Draft Policy	Summary of comments	Response	Outcome
	<p>establishes the importance of protecting sites in accordance with a hierarchy, which is welcomed.</p> <p>Landscape and Nature Recovery – Biodiversity</p> <p>It is appreciated that groundwater catchment areas for Oxford Meadows SAC, Lye Valley and New Marston Meadows SSSI's have been specifically highlighted within this policy. It may be useful to highlight that other designated sites may also be impacted hydrologically, and this should be considered as part of an application.</p> <p>Reference to Road Verge Nature Reserves (RVNRs) as a type of non-statutory designated site would be welcomed within this policy. Further information regarding RVNRs and RVNRs within Oxford city can be found at https://www.oxfordshire.gov.uk/sites/default/files/file/countryside/RVNRSurveyReport.pdf.</p> <p>The supporting text to the policy includes references to the emerging Oxfordshire Local Nature Recovery</p>	<p>We are not considering hydrological evidence for other designated sites.</p> <p>We can consider the inclusion of a reference to this within the policy/ plan.</p> <p>We can consider this if the study is published/ adopted in</p>	<p>No Action Required</p> <p>Oxford City Action: Consider proposed wording going forward.</p> <p>Oxford City Action: Consider proposed wording going forward.</p>

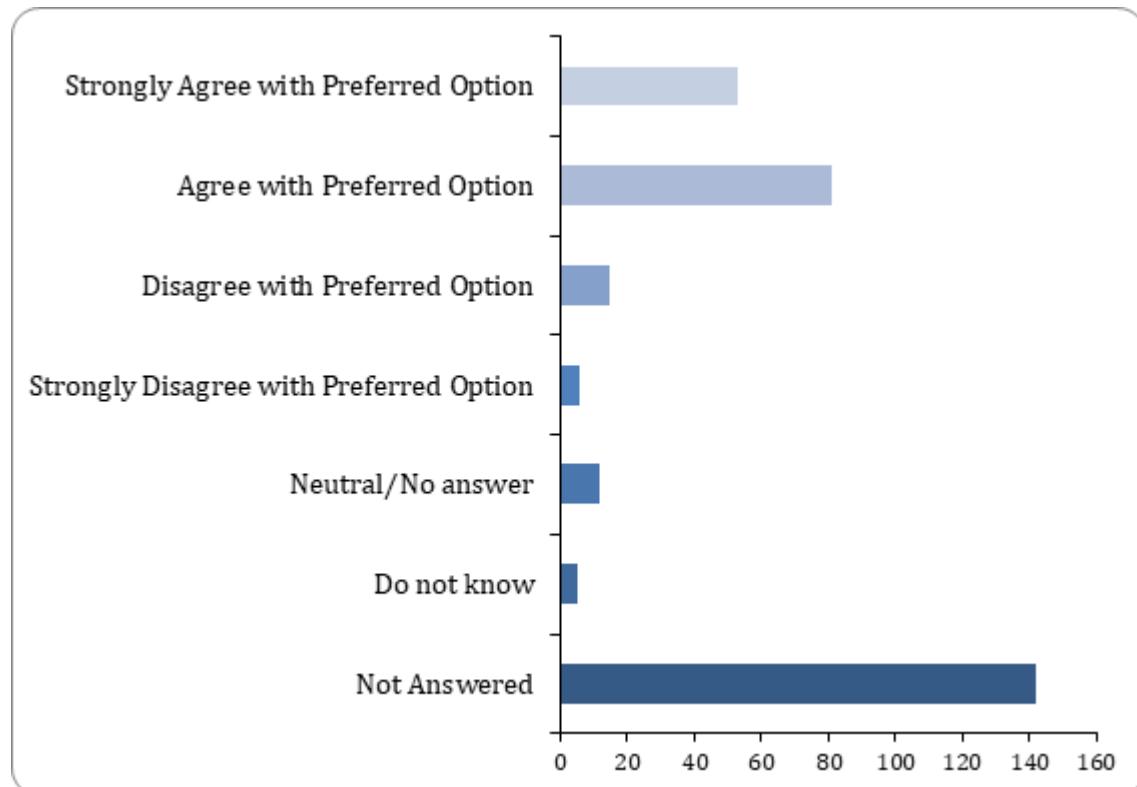
Draft Policy	Summary of comments	Response	Outcome
	Strategy (OLNRS). Consideration should be given to whether it should not also be referenced in the policy text.	a timely manner to meet our plan-production deadlines.	

All Public Responses – Draft Policy G7

Flood risk

Please tell us what you think of policy options set 007a (draft policy G7): Flood Risk and Flood Risk Assessments

There were 172 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	53	16.88%
Agree with Preferred Option	81	25.80%
Disagree with Preferred Option	15	4.78%
Strongly Disagree with Preferred Option	6	1.91%
Neutral/No answer	12	3.82%
Do not know	5	1.59%
Not Answered	142	45.22%

Draft policy	Topic	Summary of comments	Response
G7	Policy is ineffective	<p>Policy is ineffective as development in Flood Zone 1 areas has caused by run-off repeated flooding in Flood Zones 2 and 3. All development must demonstrate net-zero greenfield runoff rates to stop downstream flooding.</p> <p>Increasing and intensive urbanisation including from transport infrastructure is a far greater cause of floods than climate change, yet it is not even acknowledged.</p> <p>Requirement of a proportional FRA for all flood zones including offsite cumulative risk, as well as ensuring that sites in Flood Zone 1, that are surrounded by Flood Zone 2/3 land would still require safe access/ egress during a flood event.</p>	<p>All sources of flooding must be considered for any site including risk of surface water flooding in Flood Zone 1.</p> <p>The Level 1 SFRA considers the cumulative impact of development on flood risk within the catchment.</p> <p>Safe access/ egress to the site would be assessed as part of the planning application.</p>
G7	Preferred Option	Agree with Preferred Option, but not with point k), as redevelopment should be allowed to encroach into Flood Zone 3b as it could still result in a decrease in flood risk through careful design.	The Environment Agency has been clear that this approach is unacceptable. Careful design can avoid redevelopment of a site encroaching on Flood Zone 3b.
G7	Support Alternative Option 1	Strongly agree with Alternative Option 1 - prevent development of greenfield sites within flood zone 3a, but with specific exemptions (e.g. for allocated sites).	National policy does allow for some types of development in Flood Zone 3a but for more vulnerable development such as housing, the Exception Test

Draft policy	Topic	Summary of comments	Response
			would be required and need to be passed.
G7	Support Alternative Option 2	Strongly support Option 2 - just rely on national policy. This policy should only include locally specific flood risk mitigation requirements that are not previously covered in national policy. National policy already demands a sequential test, an exception test and site-specific FRAs. The requirements in Policy G7 would add blanket FRAs for a minor development in the city which is considered too onerous and would slow brownfield intensification.	Oxford has a unique flooding environment and particular constraints on development in the city. There is a risk that a more generalised approach misses opportunities to address this.
G7	Do not allow development in the flood plain	No development should be allowed on the flood plain. They are also important ecological habitats for nature plants, insects and animals.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF.
G7	Do not allow development in Flood Zone 3	No development should be allowed in Flood Zone 3b. Should be a ban on development on low-lying Flood Zone 3 land as flood defences do not protect against groundwater flooding.	This approach could restrict opportunities for utilising land for other uses, e.g. to meet the city's housing need, which could come forward designed in a way

Draft policy	Topic	Summary of comments	Response
			<p>that is safe from flooding, does not displace flood risk elsewhere, and is in accordance with the NPPF.</p> <p>All sources of flooding must be considered for any site, including groundwater.</p>
G7	Climate change not considered	The whole plan envisages much too much development on land prone to flooding e.g. many of the specified sites. Climate change means there will be an increased risk of storms and flooding, and the categorisation of land may already be out of date. It is unreasonable to expect residents or businesses whose neighbouring property becomes liable to flooding to suffer this so that developers can benefit from building on flood prone land.	National guidance is clear that flood risk must be considered now and for the lifetime of development – climate change projections are considered.
G7	Other sources of flooding	Applicants should be required to consider flooding from all sources, not just fluvial. Additional controls are required re basements which should be forbidden in 3b and 3a where fluvial flooding has occurred in last 10 years. Assumptions must be made that flooding will become more frequent, both fluvial and pluvial, as evidence is already suggesting. The flood risk maps do not adequately take account of pluvial flood risks, especially where	National policy and guidance dictates that all sources of flooding must be considered. In March 2025, the Environment Agency updated their mapping for flood risk which included showing surface water flood risk.

Draft policy	Topic	Summary of comments	Response
		large scale development has taken place in the neighbourhood.	The policy states that proposals for basement accommodation within Flood Zone 2 or 3 will not be permitted due to the unacceptable additional risks associated with this type of accommodation.
G7	Importance of natural flood prevention measures	<p>Any natural flood prevention measures such as tree planting and rewilding would be preferable to more concrete and drains.</p> <p>Policy needs to stress more clearly that the biodiversity value of the SuDS scheme must be maximised.</p> <p>Water that is currently retained by the extensive vegetation and the clay soil such as at North Oxford Golf Club will enter the drainage system so much more quickly in the future once it is developed.</p>	Draft Policy G8 addresses Sustainable Drainage Systems (SuDS) and the importance of green SuDS.
G7	Canal & River Trust	Navigation authorities should be consulted by the local planning authority concerning sites adjacent to, or which discharge into, canals – especially where these are impounded above natural ground level. Happy to help with the evidence for the SFRA where possible, despite the PPG not	Noted.

Draft policy	Topic	Summary of comments	Response
		specifically recommending consultation with the Canal & River Trust.	

Statutory Consultee Responses – Draft Policy G7

Environment Agency

Draft Policy	Summary of comments	Response	Outcome
Policy G7 Flood Risk and FRAs	<p>Suggested a couple of minor changes to the wording in the policy in respect of criteria e) and n).</p> <p>Detailed comments were received in respect of the OFAS (Oxford Flood Alleviation Scheme), Strategic Flood Risk Assessment (SFRA) and the proposed site allocations.</p>	<p>Agree with the suggested amendments.</p> <p>Noted – work is ongoing to resolve comments.</p>	<p>Criteria e) and n) of the Policy has been amended to incorporate the suggested wording.</p> <p>These comments will be addressed in detail in the Statement of Common Ground</p>

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome

Policy G7	LLFA		
Flood Risk and FRAs	No further comments	Noted.	No Action Required
	<u>Landscape & Nature Recovery – Landscape</u> The reference in the policy to the multi-functionality of SUDS is supported. It is recommended that SUDS are designed in a way that they are attractive spaces that offer landscape, visual, ecological and recreational benefits	Noted.	No Action Required

Thames Water

Draft Policy	Summary	Response	Outcome
G7 Flood risk	Generally support Policy G7 as it is in general accordance with the NPPF and the PPG, particularly support the reference to sewer flooding.	Support welcomed.	N/A
G7 Flood risk	Flag that often infrastructure for sewage treatment is located close to rivers. It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept	Noted.	N/A

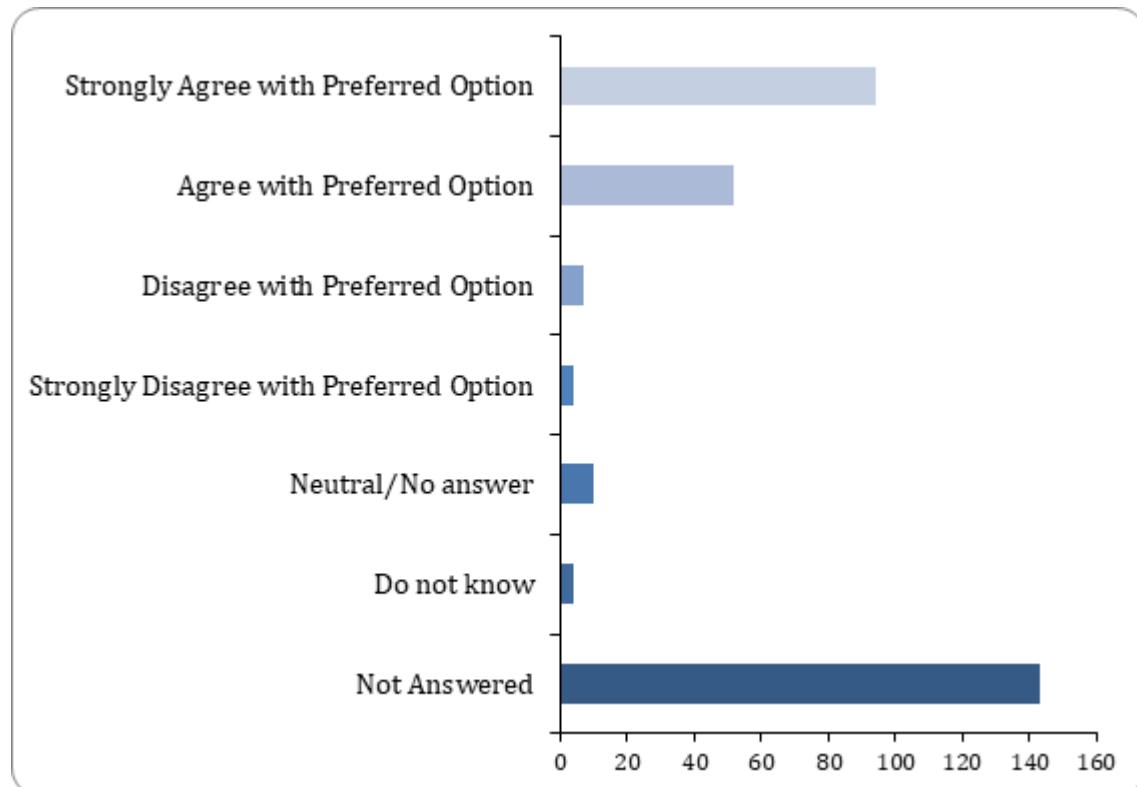
Draft Policy	Summary	Response	Outcome
	that water and sewerage infrastructure development may be necessary in flood risk areas.		
G7 Flood risk	Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.	The policy is clear that applicants need to consider flooding from all sources, which would include sewer flooding. It also sets out that an FRA should demonstrate that the proposed development would not increase flood risk offsite;	No further change proposed at this time.

All Public Responses – Draft Policy G8

Sustainable Drainage Systems

Please let us know what you think of policy options set 007b (draft policy G8): Sustainable Drainage Systems (SuDS).

There were 171 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	94	29.94%
Agree with Preferred Option	52	16.56%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	143	45.54%

Draft policy	Topic	Summary of comments	Response
G8	Additions to Preferred Option	<p>Developers should first be encouraged to integrate closed-loops systems into their designs, such as systems to catch and clean or reuse greywater (e.g. handwashing and showers to flush toilets); urine-diversion dry composting toilets; rainwater harvesting.</p> <p>Object to discharge to a combined sewer even in exceptional circumstances. This should not be built in at the design stage.</p>	<p>Noted.</p> <p>This is at the bottom of the drainage hierarchy, and it is expected that applicants would need to sufficiently demonstrate why all other options would not be possible.</p>
G8	Support Alternative Option 1	<p>Development should not be allowed on sites where SuDS are not feasible. There should be no exceptions from the requirement to provide for satisfactory drainage of all new properties. There is a danger that arguments for sites not being feasible will be put forward.</p> <p>Do not rely on national policy – should be done locally as requires local knowledge.</p>	<p>The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application <i>“unless there is clear evidence that this would be inappropriate”</i>.</p> <p>Support for additional details is welcomed.</p>
G8	Support Alternative Option 2	Do not include a policy about SuDS but rely on national policy instead.	Guidance in national policy about SuDS is limited in terms of ‘good design’ and regarding wider objectives (e.g. water

Draft policy	Topic	Summary of comments	Response
		National guidance already obliges major schemes to incorporate SuDS and demonstrate they mimic natural run-off. Draft Policy G8 would go much further, demanding SuDS on every application and banning grey SuDS. The cost of this would mean very little brownfield development in Oxford would come forward.	quality). The policy provides additional detail, e.g. design standards which are specific to Oxford.
G8	Local requirements	Reduce the mandatory development site size for SuDS to 50/5000sqm/100, especially where upstream from previously flooded downstream sites. 100 dwellings far too high. 20 would be better.	As per the NPPF (2024), SuDS should be incorporated as part of any planning application unless there is clear evidence that this would be inappropriate.
G8	Grampian condition required	A Grampian condition for all development in Oxford should be required to ensure Thames Water can manage surface runoff.	It is not practical to do this - each planning application is assessed on their own merits.
G8	Green SuDS and drainage hierarchy	Add that actual SUDS mean areas of vegetation - preferably including trees - to ensure long-term drainage effectiveness. Without enforcement, SUDSs are alleged rather than effective. Actively discourage the use of paving or decking. Encourage use of water butts to capture rainwater and then use it to water gardens. This reduces the	The draft policy can only apply to new development, but green SuDS are prioritised. Any new proposals must submit a maintenance plan demonstrating how SuDS will be managed and remain effective for the lifetime of the development.

Draft policy	Topic	Summary of comments	Response
		amount of water in drains and allows absorption of surface water.	Drainage hierarchy in this policy prioritises storing rainwater for later use.
G8	Drainage concerns in Lye Valley	<p>No further development (including house extensions) should be permitted to connect to the Thames Water sewer network within the Lye Valley fen catchment. Smaller extensions are only acceptable if they connect to a soakaway but not into the surface water drainage system.</p> <p>SuDS infiltration in Lye Valley is insufficient as a replacement for loss of natural surface cover.</p>	<p>It is not practical to have a blanket ban on development in the Lye Valley. Each planning application is assessed on their own merits.</p> <p>The draft Policy acknowledges that infiltration will not always be the most suitable means of SuDS.</p>
G8	Inconsistency with national policy	Para.182 of the NPPF states that SuDS should be <i>“proportionate to the nature and scale of the proposal”</i> . It is not proportionate to require all development proposals to provide SuDS and the caveat <i>“where feasible”</i> does not appropriately cover the conditions where SuDS would not be required.	The draft policy echoes Paragraph 181, bullet c) of the NPPF (2024) which expects SuDS to be incorporated as part of any planning application “unless there is clear evidence that this would be inappropriate”.
G8	More flexibility in policy required	Draft policy is too rigid. Below ground features should be allowed in situations where site constraints exist e.g., groundwater, contamination, land-use efficiency, whilst still enabling SuDS to be used where appropriate.	Green SuDS are often considered at too late a stage in a scheme. If they are considered in the conceptual and design stages, they are more likely to be able to be well-designed into

Draft policy	Topic	Summary of comments	Response
			the proposal. They can provide a multitude of benefits that grey SuDS can't, including providing open space for recreation, habitats to support wildlife and adaptation to other climate hazards such as overheating.

Statutory Consultee Responses – Draft Policy G8

Natural England

Draft Policy	Summary	Response	Outcome
G8	Fully support the requirement for SuDS on all new development. Recommend that SuDS are linked up wherever possible (including with other greenspace) to achieve greater benefits for water management and wildlife, to contribute to green infrastructure and support robust ecological networks. Given the risks to water quality which can be presented by antiquated drainage systems, also advise considering whether developments could be supported and encouraged to replace	Welcome the support and agree with the comments, though we would suggest these are better placed in supporting guidance which could help in implementing the Local Plan's requirements.	Consider how these points could be picked up in a future Technical Advice Note in due course.

Draft Policy	Summary	Response	Outcome
	existing (older) surface drainage systems with sustainable urban drainage systems (SuDS).		

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy G8 SuDS	<p><u>LLFA</u></p> <p>The policy refers to the Local Standards produced by the LLFA. This reference should be removed and/or replaced in the policy text with reference to any National Standards. The local standards are currently being reviewed following the DEFRA update Standards on 19th June 2025 and could be considered to not be up to date. Where a policy relies on these standards it needs to be able to be updated as the standards may develop further in the future.</p>	<p>We can consider how to address this issue. However, presumably once the LLFA standards have been updated, there will be no longer a need to rely on the national standards?</p>	<p>Oxford City Action: Consider proposed wording going forward.</p>

Thames Water

Draft Policy	Summary	Response	Outcome
G8 SuDS	Support Policy G8 in principle. Flag that it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or	Noted – the SuDS policy sets out various requirements which seek to ensure an	No further change proposed at this time.

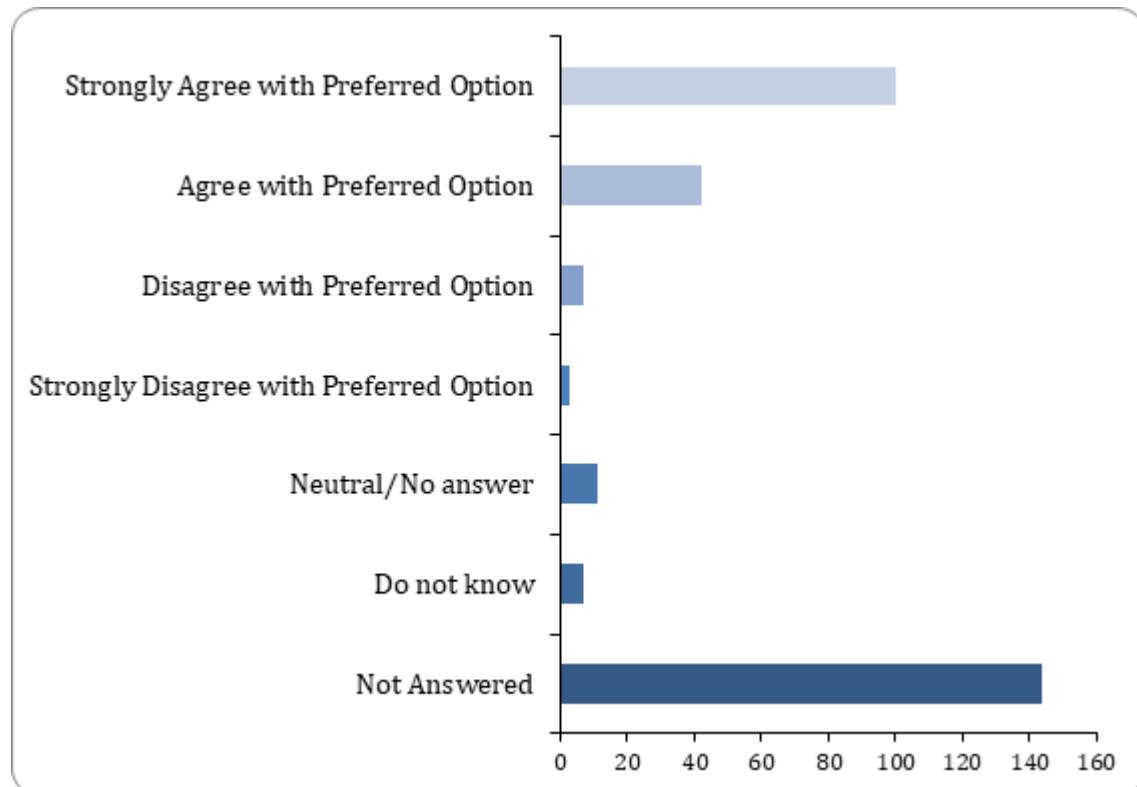
Draft Policy	Summary	Response	Outcome
	surface water sewer in accordance with the drainage hierarchy.	appropriate drainage strategy is pursued including prioritising green, multifunctional SuDS features where possible before other options.	
G8 SuDS	Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system.	Policy R5 – water resources and quality sets out requirements for separating foul and surface water on new development and encourages applicants to take opportunities to separate these on existing development.	No further change proposed at this time.
G8 SuDS	Flag that SuDS don't just help with flooding but also improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.	Agreed, the policy context (supporting text) will set this out clearly.	Updated policy to be published as part of Reg 19.

All Public Responses – Draft Policy G9

Resilient design and construction

Please tell us what you think of policy option set 008d (draft policy G9): Resilient design and construction.

There were 170 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	100	31.85%
Agree with Preferred Option	42	13.38%
Disagree with Preferred Option	7	2.23%
Strongly Disagree with Preferred Option	3	0.96%
Neutral/No answer	11	3.50%
Do not know	7	2.23%
Not Answered	144	45.86%

Draft Policy	Summary	Response	Outcome
G9	Preferred option	Support option 1 - Promote sustainable development, climate adaptation, energy efficiency and offsetting adverse environmental effects. More likely to ensure requirements are not watered down in practice.	Noted
G9	Preferred option	Comments in support of option 1, other comments were expressing support for 2 and/or option 3.	Noted – the background paper set out the rationale for the Council's preferred option.
G9	General support for the policy	All elements covered by the policy are extremely important.	Noted – support welcomed.
G9	Adaptation should be prioritised over carbon reduction.	Climate adaptation (to overheating, rain) should take priority over carbon footprint.	Noted – however, we do not consider it to be an 'either/or' choice. There are important reasons to pursue both aspects of the climate change response. Cutting emissions helps to avoid impacts of more pronounced hazards in future, but adapting to risks now helps to lessen their impacts, particularly where these cannot be avoided, and can secure multiple other benefits for people.

Draft Policy	Summary	Response	Outcome
G9	Need for proportionality for minor development.	Policy objectives are reasonable but also important to ensure proportionality of such requirements for minor developments or they will be unaffordable.	Noted – whilst the policy sets out the key things an application should respond to, it is flexible in the level of detail an application should provide, allowing this to be proportionate to the scale of the development.
G9	Additional costs for residents	Concern about more costs imposed on residents.	See response above re: the flexibility allowed for in how applicants respond to requirements. We would add that incorporating these resilience measures into a development during construction should be cheaper and easier than retrospectively trying to incorporate these into a building in future after it has been constructed. A resilient development can also help to save occupants in terms of the costs that could arise when a hazard like flooding or overheating hits by lessening the impact and helping to recover quicker.
G9	No need for local policy and/or concern	Should defer to national requirements. Some requirements e.g. Noise, lighting, dust and fumes are already tightly	Concerns noted, however, the Council considers the policy to take a pragmatic and proportionate

Draft Policy	Summary	Response	Outcome
	about additional complexity to planning process	<p>controlled through the NPPF, Building Regulations, the Environmental Protection Act and construction-management conditions. Bespoke local rules simply repeat those safeguards while forcing applicants to commission yet another impact statement and negotiate yet another set of mitigation measures, increasing cost and delay without delivering any extra protection.</p> <p>Concern about more complexity in planning process and whether the Council will have resource to assess applicants' submissions or defend the requirements.</p>	<p>approach to ensuring new development is designed to incorporate resilience to current and future climate change. This responds to the increasing climate change risk that faces the city (and the fact that Oxford is already at increased risk compared to other areas in the county). Whilst some requirements may be nationally set, other elements are not enforced nationally. The policy is clear that where evidence has been produced to meet other requirements, this can be referenced. It also helps to ensure that other elements of climate risk are considered.</p>
G9	No need for local policy	<p>Comments expressing no need for local climate policies, or that the Council should not meddle and should leave decisions to developers and their investors – no further reason given.</p>	<p>Noted – see earlier responses which set out why we consider this policy to be important.</p>

Draft Policy	Summary	Response	Outcome
G9	Requirements should be stronger for new build and retrofit.	Requirements for new build/retrofits to have solar PV, heat pumps, green roofs in selected location should be made stronger.	These requirements are set out in other policies e.g. R1 deals with requirements for renewables and G2/G3 deal with requirements for additional greening.
G9	Policy should have defined catchments	Policy needs to define catchment ranges over which its requirements apply.	The policy applies across the city though certain risks will be higher in certain areas depending on proximity to certain hazards (e.g. flood plain).
G9	Requirements should apply to all sites/development	Requirements should apply to all sites/developments.	Noted – the policy applies to all proposals excluding householder applications (though these may be subject to other requirements elsewhere in the Local Plan). There is, of course, nothing preventing householders from following the principles of the policy also, and this would be encouraged.
G9	Assessments/mitigations should be informed by expertise	Assessments/mitigations should draw upon the (funded) expertise of local environmental charities i.e. BBOWT and Earth Trust.	The policy does not specifically flag particular stakeholders that applicants should engage with as this could change throughout the plan's lifetime and will also depend on the

Draft Policy	Summary	Response	Outcome
			context of each application. Where necessary, applicants may of course benefit from additional expertise to inform particular aspects of their application and this would help in evidencing how they have met the requirements.
G9	Support addressing risks of overheating	Experience of working in buildings constructed before concerns about heatwaves/overheating were common shows that preparing for these impacts is essential. Some classrooms becoming unusable in heatwaves. Need good design/ventilation as well as trees to mitigate impacts.	Noted – the policy emphasises the need for addressing overheating and having a cooling strategy (addressing inside and outside exposure to heat) as one of its criteria.
G9	Should assume future impacts will be worse	Should assume that the worst floods in the future will be worse than those in the past.	In principle, this would align with a precautionary approach, although the picture of how flood risk is likely to change in future depends on various factors and will not be the same everywhere. We have incorporated wording into the introduction to the subsection of the chapter containing policies G7-

Draft Policy	Summary	Response	Outcome
			G9 which flags to applicants how we expect climate hazards in the city to worsen over time.
G9	Development in flood plain not suitable	Site which is part of a flood plain such as Marston Rd. and land behind and surrounding St. Clements Church seems not to be a good candidate for building on.	Where proposing development in areas of flood risk, applicants will be expected to follow the requirements of the Local Plan's flood risk policy alongside this policy.
G9	Require ground water and surface water studies	Require professional ground water and surface water studies and their impacts on ALL developments.	This is not considered to be a proportionate approach – some development has more risk of adverse impacts on ground water or surface water than others. Other policies set out requirements for additional evidence where necessary in response to potential impacts e.g. on flood risk (G7) or ecology (G6).
G9	Groundwater	Do not address ground water / Do not address ground water and surface water impacts on sensitive sites.	See response above

Draft Policy	Summary	Response	Outcome
G9	Excess water demand and hosepipe bans	Already have excess water demand and hosepipe bans.	The Local Plan includes a separate bespoke policy on water resources and water quality (policy R5). This policy cross refers to that policy and emphasises the need for water saving measures in light of added stresses on resources that are expected as summer become hotter and drier in future.
G9	Lye Valley	<p>Current drainage flowing into Lye Valley needs to be assessed.</p> <p>Development is the biggest threat to the Lye Valley and should not be permitted.</p> <p>Lye Valley is an amazing resource and should definitely be strongly protected.</p>	See responses against policy G6 in relation to Lye Valley. The policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.
G9	Extend same approaches for Lye Valley to wider city.	Agree with approach and flag that what is good for the Lye Valley could and should become applied throughout the Oxford City Council area.	Noted – in a general sense this may be true, however, there could be other contextual considerations which will impact levels of climate risk in different parts of the city and should inform the interventions incorporated

Draft Policy	Summary	Response	Outcome
			into a development to address climate change hazards.
G9	Protect green and blue infrastructure	Protect our green and blue infrastructure at all costs.	Separate policies in the Local Plan seek to protect the green infrastructure network (see policy G1 in particular). The supporting text to G9 will also emphasise the valuable role green features can provide for adaptation.
G9	Policy should apply to sensitive non-designated sites	Should apply also to sites that are sensitive but not currently designated as protected/sensitive sites.	As per earlier response, the policy applies to all proposals excluding householder development, wherever they are proposed in the city. Particular areas are neither scoped in or out of where the policy applies.
G9	Overdevelopment in city	Concerns about overdevelopment in the city.	Concerns noted, however, new development is a necessary part of how the city will continue to function and support residents and businesses in the future. The Local Plan's role is ensuring that this development comes forward in the right way. The policies of the Plan need to be read as a whole. There are a

Draft Policy	Summary	Response	Outcome
			range of policies throughout chapters 4 and 5 which seek to mitigate the impacts of development, and/or secure improvements in the environment.
G9	BBOWT	Concern that the wording of Policy G9 does not seem to refer to and/or conflicts with the need for protections for Lye Valley and Lowland Fens habitats more generally.	The policy has a completely different focus – specifically, it is about driving more climate resilient design in new development. Protections for the Lye Valley and other habitats are dealt with through other policies – e.g. policy G6.

Statutory Consultee Responses – Draft Policy G9

Oxfordshire County Council

Draft Policy	Summary of comments	Response	Outcome
Policy G9 Resilient Design and Construction	<p>Climate Action</p> <p>Support references to adapting to the impacts of climate change.</p> <p>Reference should be made to climate-resilient landscaping, e.g., <i>“Landscaping and green</i></p>	Noted.	<p>No Action Required</p> <p>Oxford City Action:</p>

Draft Policy	Summary of comments	Response	Outcome
	<p><i>infrastructure must be designed to withstand extreme weather conditions, such as heatwaves and droughts, through the use of drought-resistant plants, shaded areas, green roofs, and rainwater harvesting systems.”</i></p> <p>Under (b) reference should also be made to cooling public space within the development, such as green roofs to reduce the heat island effect, shaded public space, and the use of light-coloured materials to improve outdoor thermal comfort.</p> <p>Under (d) examples could given for water efficient technologies, such as rainwater harvesting, low-flow plumbing, grey water recycling and smart irrigation.</p> <p>Urban Design (Placemaking)</p> <p>Resilient design could also apply to buildings and spaces being adaptable to changing uses and functions. E.g. Covid-19 led many empty office units, some of which may have been repurposed as residential since.</p>	<p>We can consider including a reference to climate-resilient landscaping.</p> <p>We can consider adding a reference to urban cooling although reference already exists in Policy G2.</p> <p>We can consider whether to include examples of water efficient technologies.</p> <p>Noted.</p>	<p>Consider proposed wording going forward.</p> <p>Oxford City Action: Consider proposed wording going forward.</p> <p>Oxford City Action: Consider proposed wording going forward.</p> <p>No Action Required</p>

Thames Water

Draft Policy	Summary	Response	Outcome
G9 Resilient design	Support Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.	Support welcomed	N/A

All Public Responses to the Whole of Chapter 4

Draft policy	Topic	Summary of comments	Response
Chapter 4	Explicitly state that greenfield will only be developed if no brownfield sites are available/meet needs	The consultation for the 2040 Local Plan in 2022 included this policy option: "Option for policy approach - Allow development on greenfield sites only if no brownfield sites are available and needs are not being met on brownfield sites." which BBOWT supported. We would have welcomed a similar option being available in this 2042 Local plan consultation. In considering this policy area we ask that the Council takes into consideration that in the report for the Issues Consultation for the Local Plan to 2040, 81% of respondents rated: "Safeguarding the natural environment and its wildlife habitat" as being "Very important", and that in total 96% of respondents rated it as being either "Very	A number of growth strategies are considered in the Sustainability Appraisal. Ultimately, the approach taken by the Plan is that all green spaces have been considered against the GI strategy for the level of protection appropriate to them, and the majority of green spaces in the city are strongly protected because of their value.

Draft policy	Topic	Summary of comments	Response
		<p>important” or “Important”. And that 85% of respondents rated: “Preserving open spaces” as being “Very important”, and that in total 98% of respondents rated it as being either “Very important” or “Important”. Comparing these questions to all of the other questions that were structured in the same way in the 2040 Local Plan consultation, these two showed by far the highest % in the “Very important” category. We ask that Oxford City Council responds to this very strong indication from the people of Oxford of how important to them biodiversity and green spaces are by taking forward in the next stage of the plan policies that are exemplary and ground breaking in facilitating both the protection and enhancement of the biodiversity and green spaces of Oxford, protecting both accessible green spaces and those that are not open to the public. The survey for the 2042 Local Plan now under development gave the following results indicating very strong support for protection and enhancement of biodiversity in the City: “72.43% of respondents declared biodiversity to be very important them and</p>	

Draft policy	Topic	Summary of comments	Response
		15.68% declared biodiversity to be slightly important to them."	
Chapter 4	Supportive	Cyclox support all policies in this chapter	Support is noted and welcomed.
Chapter 4	Supportive	We very strongly support all these policies, especially E1 Protection of green infrastructure which we believe should be given very strong weight, reflecting the importance of Oxford's network of green spaces to the character and setting of the city, the well-being of its inhabitants and climate resilience. There should be clear recognition that existing green spaces are a finite resource, not easily re-created when lost or damaged.	Support is noted and welcomed.
Chapter 4	General comment – Greater Oxford Nature Park	Oxford is not only important because of its urban wildlife, but also because of the access to these green spaces. The majority of these sites are publicly accessible, with footpaths along the Cherwell winding through the extent of central Oxford. I have regularly been able to lead wildlife education sessions here for both adults and students from primary school age to master's degree level. This is an incredibly important aspect of working in Oxford's green	Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.

Draft policy	Topic	Summary of comments	Response
		<p>spaces – everyone should be able to share, enjoy, and learn within them. Despite impressive efforts from education officers in organisations such as the Oxford Earth Academy, there remains much potential for wider outreach and education across the green space in Oxford.</p> <p>With the new Local Plan, there is a remarkable opportunity to join up and uplift these important green fragments across the city. It is critical that these green spaces are protected from the impacts of future development in Oxford. Damaging developments have already progressed despite major losses in biodiversity and in access for people to green space, such as in Spindleberry Nature Park in East Oxford.</p>	
Chapter 4	General comment – Greater Oxford Nature Park	<p>I am supporting the suggestion that is being discussed by a growing number of people that we need to value our green spaces in and around the city for nature based education. To be effective these spaces need to be accessible from schools and communities, biodiverse and</p>	<p>Proposals for the Greater Oxford Nature Park is part of wider proposals for the Greater Oxford authority area, which is beyond the scope of the current consultation.</p>

Draft policy	Topic	Summary of comments	Response
		varied, connected with wildlife corridors to other sites to maintain biodiversity as this expands the effective space for species that need space, and large and diverse enough to cope with the numbers of young people in the city that need access to green spaces. Oxford has a really valuable asset in its 75+ green spaces which have a good level of biodiversity across the city. We could recognise these as a Greater Oxford Nature Park and develop a nature education strategy to boost the skills of our young people.	
Chapter 4	General comment	Please keep Oxford green and do not develop the green spaces around, thanks	Comment noted.
Chapter 4	General comment	Definition needs to be wider to include meadow, grassland, scrub, abandoned brown field site. All biodiverse sites and the connections between them.	Comment noted.
Chapter 4	Climate change and biodiversity	A network makes a lot of sense, and should be linked as much as is feasible. Climate change and the biodiversity crisis is by far the biggest	Comment noted.

Draft policy	Topic	Summary of comments	Response
		<p>challenge we face... Too often planning application include a lot of greenwashing - it is difficult to quantify biodiversity loss and how to offset it. There could be a department employing ecologists...</p> <p>I am generally supportive of all things green. Hope you include schemes such planting pollinator friendly species, severely limit the use of pesticide, get on top of water pollution wherever possible, and so on.</p>	
Chapter 4	Policies do not align with plan objectives	<p>The perceptive and sympathetic comments re: value of green spaces to the community and wildlife contrast strongly with the draft policies which allow developers to get around any planning constraints in respect of green spaces.</p> <p>Draft policies do not sufficiently protect our green spaces and wildlife from development - to the detriment of our community, environment and wildlife itself.</p> <p>The Draft Plan's approach is largely homocentric, concentrating on how a green</p>	<p>The plan introduces a Green Infrastructure (GI) Network and categorises green and blue spaces "Core", "Supporting", and "All other". This evidence-based categorisation provides an appropriate system of protection across the entire network as the most valuable green spaces are protected.</p>

Draft policy	Topic	Summary of comments	Response
		<p>space benefits people rather than on its intrinsic value to wildlife itself. To develop land – whether for housing or other uses – is to privatise it. This Local Plan will result in privatising land which should be publicly accessible and depriving the community of amenities which benefit them.</p> <p>The Draft Local Plan prioritises development over the health and well-being of its citizens. This is not acceptable. It is not what people want.</p>	
Chapter 4	Statutory weight of policies	<p>Other concerns are held about the exemptions built into these policies. Having developed strong policies, we do not want developers to be able to easily avoid following them. As with other sections in this document, we would like to see more detail on the cases where exemptions to local plan policies will be allowed. We would also like to reiterate the need for developers to maintain biodiversity offsets in the medium to long term, to ensure this net gain is not lost.</p>	<p>Once fully adopted the local plan is a statutory document, and all planning decisions in Oxford will be required be in compliance with the policies it contains.</p> <p>The policies and supporting text will clearly set out the criteria against which proposals will be assessed. Exemptions do not</p>

Draft policy	Topic	Summary of comments	Response
			apply as a matter of course for all policies and where they exist, will be narrowly focussed in order to make the policy more effective while not undermining the overall objective.
Chapter 4	Short survey wording	The statement within the wording of Question 2 of the Short Survey – which states <i>we think it is important that Oxford is a green biodiverse city....We are protecting our important green spaces and features</i> – is misleading. This is not what the Council is doing.	Comment noted.

