Background paper 005a

Title: Green Infrastructure

This paper addresses the green infrastructure network, including the protection of green spaces and other features like trees, as well as the provision of new green infrastructure in development.
Relevant Local Plan Objective(s): • Secure strong, well-connected ecological networks and net gains in biodiversity. • Be resilient and adaptable to climate change and resistant to flood risk and its impacts on people and property. • Protect and enhance Oxford's green and blue network. • Provide opportunities for sport, food growing, recreation, relaxation and socialising on its open spaces.
SA Objective(s): 7. To provide adequate green infrastructure, leisure and recreation opportunities and make these readily accessible for all. 10. To conserve and enhance Oxford's biodiversity.
SEA theme(s): Landscape, human health, biodiversity, flora, fauna.

1. Introduction

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

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

1.2 The Planning Practice Guidance sets out that green infrastructure includes both green and blue spaces and can include:

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

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

plans in a positive way for the creation, protection, and enhancement of Oxford's green infrastructure so that these various benefits can be maximised for the city in the future.

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

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

1.4 An important component of Oxford's Green Infrastructure network are the ecological spaces which support a variety of nationally and locally important species of flora and fauna. Some of these spaces are designated for their importance and protected by national legislation, some are protected through local policies where they are of county or

city importance, meanwhile other informal spaces like gardens and wild areas within green spaces also play an important role but are not designated as such. The ecological network is essential to supporting 'biodiversity' in the city, by which we mean the abundance of species such as plants and animals for which the city is home.

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

National Planning Policy Framework

2.1 Highlights that planning for green infrastructure can help deliver a variety of planning policy objectives. Specifically, **para 20** states that green infrastructure is an element which local planning authorities should address in their strategic policies. **Para 164 and 199** highlight that green infrastructure should be considered as important mitigation measures for the impacts of climate change and poor air quality. Further references are made to green infrastructure elsewhere in the document:

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

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

Planning Practice Guidance and National Design Guide/Model Design Code

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

2.4 In relation to biodiversity (covered in paras 9 to 35), the PPG includes various pieces of guidance including on responsibilities regarding protected and priority species and habitats; 'proportionate' information and assessment required on biodiversity impacts at all stages of development; local ecological networks and nature recovery networks; application of mitigation hierarchy, biodiversity net gain, and promotion of woodlands.

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

National Parks and Access to the Countryside Act 1949

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

Small Holdings and Allotments Act 1908

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

Oxford Local Plan 2036

2.8 The topic of green and blue infrastructure in the city is addressed in detail in chapter 5 of the adopted Local Plan, 'Protecting and enhancing Oxford's green and blue infrastructure network', through policies G1 to G8. As well as overarching policies for protection of the GI network (policy G1) and providing new green features (policy G8), there are a number of individual policies for different aspects of the GI network.

Other relevant plans and programmes/strategies

Natural England Green Infrastructure Framework (2023)

2.9 The Green Infrastructure Framework was launched by Natural England in 2023. It is a collection of policy tools and documents whose purpose is to assist local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI in local plans and in new development. The framework is structured around a number of key components that include a set of national standards on quantity/quality of GI; mapping; planning and design guidance. Whilst the Green Infrastructure Standards have no statutory power, they are intended to support better

planning for good quality GI and help to target the creation or improvement of GI, particularly where existing provision is poorest. When supplemented with local knowledge and evidence, Natural England advise that they can be used to help set local targets for provision.

Oxford City Council Green Spaces Strategy 2013-2027

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

Oxford City Council Playing Pitch Strategy 2022-2036 (and emerging update)

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

2.12 An update to the Council's Playing Pitch Strategy is currently in progress, which will cover the city to 2045. An interim update note to inform the new Local Plan, which brings together emerging analysis and findings from Strategy's development with an early picture of existing and future demand for pitches, has been published alongside the Regulation 19 consultation. The full strategy is expected to be completed later in 2026.

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

3.1 The Green Infrastructure study (2022) identified that Oxford's green spaces are providing a variety of roles that support health and wellbeing of residents and ecosystems. With regard to publicly accessible green spaces, the analysis highlighted that whilst there is a fairly even distribution of green spaces across the city in general meaning that accessibility for residents to walk or cycle to green spaces was good, however, there are inequalities in distribution of certain types of green spaces resulting in gaps in accessibility for specific types of green space. Whilst it is very challenging to establish significant new green space to counter these gaps, additional loss of open space in certain areas could exacerbate these accessibility problems or establish access deficits for other types of green space like parks or outdoor sports. In summary, the report found that:

- Allotments: Gap in access in the eastern part of the city centre (low deprivation) (however much of this area is university land), and smaller gaps in the north (low deprivation) and west (pocket of high deprivation) of the study area.

- Amenity green space: large gaps in access in the north and east of the city (low levels of deprivation, and small gaps in the south in Littlemore and Temple Cowley (high levels of deprivation). However, the good access to parks and recreation grounds across the city mitigates this.
- Parks and recreation grounds: Good access across the city. Small gap in the north in Wolvercote (low levels of deprivation) but there is access to amenity green space and accessible natural green space in this area, which helps to mitigate this gap in access (although it is acknowledged that these types of spaces do not typically offer the same level of facilities that a park might).
- Accessible Natural Green Space (15-minute walk time buffer): large gaps access in Cowley/Temple Cowley in the south and in the North (around Sunnymead), both in areas with relatively high levels of deprivation.
- Play space: for children's play spaces, gaps in access in the city centre (although much of this area is university land) and North Oxford (low levels of deprivation). There is also a gap in the south in Iffley (IMD decile of 6). For youth play spaces, small gaps in access in the centre and north of the city centre (in areas of low deprivation).

3.2 Informed by more than 200 site visits, the report also looked at quality and multi-functionality of the open spaces (helping to assess wider benefits they play to the local areas). It found that:

- The majority of public open spaces in the city (84%) were currently of good or excellent quality, however there are opportunities to improve quality on some spaces, with 16% assessed as fair or poor quality.
- Generally, the highest quality sites fall within areas of lower levels of deprivation, however there are exceptions to this. The wards with generally higher numbers of poorer scoring sites are Marston, Headington Hill and Northway, Quarry and Risinghurst, Barton and Sand Hills, Churchill and Lye Valley.
- Larger/destination parks within the city are high quality sites providing multiple functions and are important sites for tourism and built/natural heritage.
- Sites delivering very low numbers of functions tend to be private spaces and amenity green spaces. Smaller sites, including other typologies, typically delivered fewer functions (though not in all instances) and there are areas with lower levels of multifunctionality in the south and east of the city (which generally corresponds with areas of high deprivation).
- For lower scoring sites, common issues appeared to be low biodiversity value, poor access (e.g. path quality and overgrown vegetation), management of soft landscaping, dog fouling, litter and lack of signage.

3.3 A particular type of open space that provides an important role for health and wellbeing is that of playing pitches. The Council's existing strategy identified the importance of

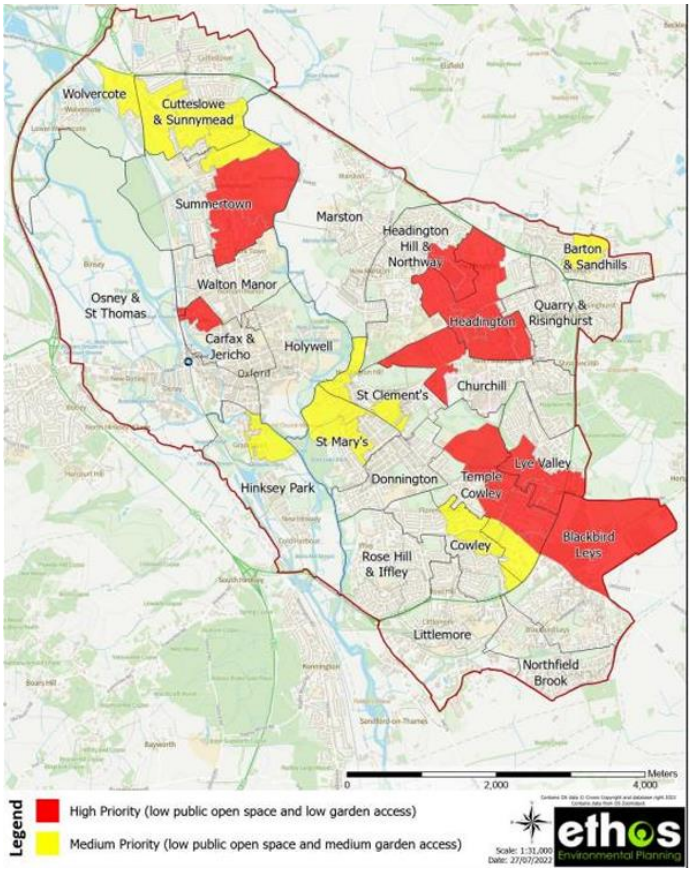
protecting pitches and indicated that any losses need to be sufficiently mitigated through sufficient reprovision as there is not generally considered to be a surplus in the city. A similar picture is emerging from the ongoing update to the Council's Playing pitches strategy when existing provision is considered against current population demands and future demands. Other mechanisms could also play a role in improving access such as enhancing existing pitches and associated facilities, as well as community use agreements.

3.4 Beyond public open spaces, there are a variety of greenspaces in the city which are not freely accessible to public, yet still make an important contribution to the overall green infrastructure network. For example, many of the schools and colleges in the city have their own playing fields and outdoor spaces which play an important role in the health and wellbeing of the young people and children in attendance and add to the sense of place locally (sometimes playing an important role in heritage setting particularly around the colleges).

3.5 According to land use data (2018), around 19.9% of Oxford's land use is classified as residential gardens. There is diversity in the amounts of green infrastructure that is present across Oxford gardens and policy has little control over how they are managed but many of these spaces nevertheless are an important location for green assets like trees in the city. Whilst only being accessible to individuals within the home, private gardens offer an important outdoor space for socialising and being active. Of course, there is not an equal distribution of this type of space across the community, and many individuals, particularly those living in flatted developments or house shares, may not have any privately accessible green space at all.

3.6 The GI study found that some of areas of the city with the lowest amounts of private garden are located in areas with lowest access to public open space. In these locations (highlighted in red and yellow in Figure 3.1), there is potential for existing open space to be under greater pressure from local residents. Notably, some of these locations are also areas of higher deprivation which could exacerbate existing health inequalities where residents are not able to benefit from sufficient outdoor space.

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



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

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

Ward	Canopy Cover (%) – Ethos analysis 2m+	Highest level of deprivation in ward (1 is most deprived)
Barton & Sandhills	21.82	2
Blackbird Leys	9.69	2
Carfax & Jericho	15.9	1
Churchill	28.1	3
Cowley	19.71	4
Cutteslowe & Sunnymead	31.02	4
Donnington	22.28	2
Headington	28.33	9
Headington Hill & Northway	32.54	5
Hinksey Park	24.07	4
Holywell	22.42	2
Littlemore	22.54	4
Lye Valley	22.74	5
Marston	22.59	3
Northfield Brook	19.62	1
Osney & St Thomas	11.64	7
Quarry & Risinghurst	29.45	4
Rose Hill & Iffley	30.26	2
St Clement's	27.64	3
St Mary's	33.27	2
Summertown	26.26	6
Temple Cowley	21.69	6
Walton Manor	26.74	9
Wolvercote	21.75	6

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

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

4.1 The currently adopted Local Plan 2036 will maintain protection of the network of green infrastructure across the city, alongside national policy (which affords its own strict protections for open space). Other legislation outside of planning that protects certain green spaces like allotments, as highlighted in section 2, will also continue to apply.

4.2 Nevertheless, a growing population means that there is likely to be increasing demand for outdoor sports provision and public open spaces in the long term. Ongoing development pressure as the city grows means that these spaces will continue to need to be protected and access enhanced wherever possible. Where additional recreational pressure is not mitigated through new or improved facilities, this can lead to a deterioration of these spaces. The quality of existing spaces already varies across the city, without additional investment, facilities associated with some green spaces may deteriorate further, exacerbating this uneven distribution in quality.

4.3 Different types of green spaces could face different challenges. In areas of the city where access to private gardens is reduced, there is likely to be particular demand on public spaces like parks and smaller amenity green areas for people to socialise and undertake physical activity, as well as allotments (many of which already have waiting lists).

4.4 Some types of GI will continue to be protected from inappropriate development through other mechanisms outside of the Local Plan, for example some trees benefit from Tree Preservation Orders (TPOs) and conservation area protection. Formal allotments benefit from protection that can only be removed via application to the secretary of state. Some of our parks and gardens benefit from heritage protection as Registered Parks and Gardens.

4.5 Blue spaces like the rivers and streams are already facing pressures from pollution as well as historic development of their banks. It is likely water quality issues relating to sewage pollution will continue without additional investment from Thames Water into the Wastewater Treatment Works, although with sufficient upgrades as are proposed, these issues could then improve. Other sources of pollution that are not within the control of the Local Plan are likely to continue without separate actions in the relevant areas such as changes to agricultural practices. Without a new Local Plan there could be additional pressure for developing on open spaces along embankments, particularly beyond 2036, which could have impacts on the water courses and exacerbate the challenges they face.

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

5. Key Issues addressed through the Local Plan 2045

Introduction

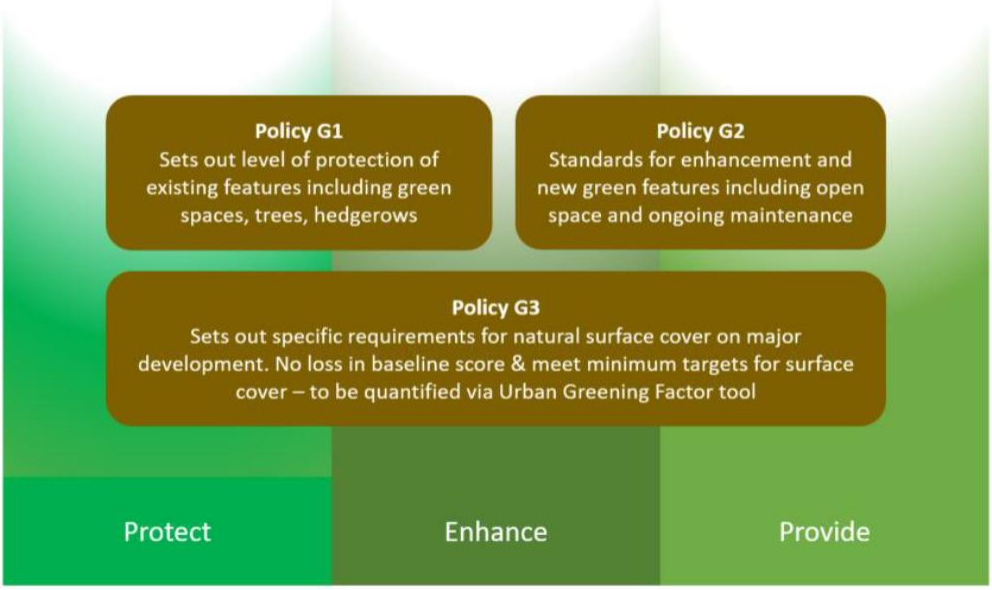
5.1 The Regulation 18 consultation identified that there were a number of topics that the Local Plan could implement policy to address which relate to green infrastructure. Under each of these topics, there were various options for policy approaches which could be taken, with differing impacts and these were presented in tables to better facilitate comparison between them. The options considered have been reviewed in light of the Regulation 18 feedback (as summarised in the consultation report) and the updates to the Local Plan period, these are reproduced in Appendix A along with the preferred approach taken forward for the Local Plan.

5.2 This section will now discuss the key issues that are being addressed through the Local Plan and how the Local Plan's policies respond to them.

Policy Approach to Green Infrastructure

5.3 The policy approach to Green infrastructure (GI) is guided by recognising and protecting a network of green features across the city and in order to harness the ability of GI to provide multi-functional benefits to the city's inhabitants and the wider environment. The intention is to ensure that new development preserves our highest quality GI and avoids unnecessary harm to it, whilst also ensuring that new GI is an integral component of the design of development. Three interrelated policies drive this approach as is shown in Figure 5.1.

Figure 5.1: The approach to green infrastructure in the new Local Plan



Establishing the Green Infrastructure network hierarchy

5.4 Oxford's Green Infrastructure (GI) network is made up of a variety of green and blue spaces across the city which provide multiple benefits to the wider natural environment and the health and wellbeing of the people of Oxford. Whilst national policy already includes protections for open space through the NPPF, which is expanded upon in the associated guidance, the Local Plan policy G1 includes additional protections and helps define the network.

5.5 Whilst the approach to all of the green spaces of the network is one of resistance to their loss or harm in line with national policy, the Local Plan assigns the spaces of the network to different levels of protection with the hierarchy set out in policy G1. The hierarchy is as follows:

- **Core**: Spaces within the highest level of the hierarchy benefit from the strongest level of protection meaning loss would not be deemed acceptable in any circumstance because their location is fundamental to the benefit they provide and to supporting the functioning of the wider network and addressing wider sustainability issues.
- **Supporting**: Spaces within the second level of the hierarchy which also play an important role in supporting the network and addressing sustainability issues; however, specific location is not as fundamental and loss could be acceptable where this is reprovided elsewhere in the network.
- **All other spaces**: Not identified through policy G1 and do not have additional

protections applied on them via the Local Plan. Applications would defer to the protections which already exist through national policy – e.g. meeting the tests for loss of open space as set out in the NPPF.

5.6 This approach is considered to be a reasonable and pragmatic way of responding to the constrained nature of the city and recognising the varying clusters of functions different spaces provide to supporting the city-wide network. It takes a strong line on protection of many spaces across the city, affording higher levels of protection to those areas whose value derives significantly from their current geographic location in order to perform these functions – value which could not be easily replicated elsewhere were they to be lost.

5.7 Equally, it acknowledges the demands on space that the city is constantly subject to and it recognises that to meet the wider vision for the city in 2045 and meeting the other Local Plan objectives, sometimes other types of uses may be necessary. Whilst the protection of the supporting tier also exceeds national policy, it recognises that these spaces can provide more limited value to the overall network where they currently preside and that these could potentially be reprovided in another part of the network without irreparably reducing quality of GI in the city where a more fitting use can be demonstrated for the site.

Identifying spaces within the Core Network

5.8 Several typologies of green spaces which were automatically assigned to the core network because these typologies provided a clear role or unique set of functions/benefits that other typologies could not and in a location that would be challenging to reprovide in the short term as part of the development process. These typologies included:

- allotments for their role in food growing and social interaction, particularly for those without private gardens (also protected through additional national legislation),
- churchyards/cemeteries because of their important setting for heritage assets and burial spaces.
- ecological sites protected under a local or national designation due to their specific ecological value for the habitats in these areas to supporting biodiversity.

5.9 Access to a park that can provide multiple types of facilities and functions to meet recreational needs was also considered to be an important component to the GI network, particularly in supporting the needs of residents with limited private open space but also more generally for meeting a range of health needs. The GI study identified a number of 'destination' parks which are of a significant size (varying from 7ha to 122ha), which formed the basis of a list of sites to be included in the core network. Council officers subsequently reviewed and added to this list to ensure some additional parks were protected across the city including where they were part of a limited offer of alternative green spaces in areas of significant deprivation.

5.10 Other typologies of open space with a more heterogenous character required a more nuanced approach, particularly where they were more variable in the types of functions they provide. Unlike spaces with a more singular or primary function such as an allotment, or cemetery, other spaces such as the remaining parks as well as areas of natural green space can vary more greatly in character and the role they play in the network sometimes. There are a range of parks and gardens in the city for example and some have an important heritage status being designated as Registered Parks and Gardens; whilst some are particularly large and serve a wide area of the community; others are much smaller with limited features and potentially congregated in areas with an abundance of other types of green space. This variation necessitated further analysis to designate certain spaces into core and others into supporting.

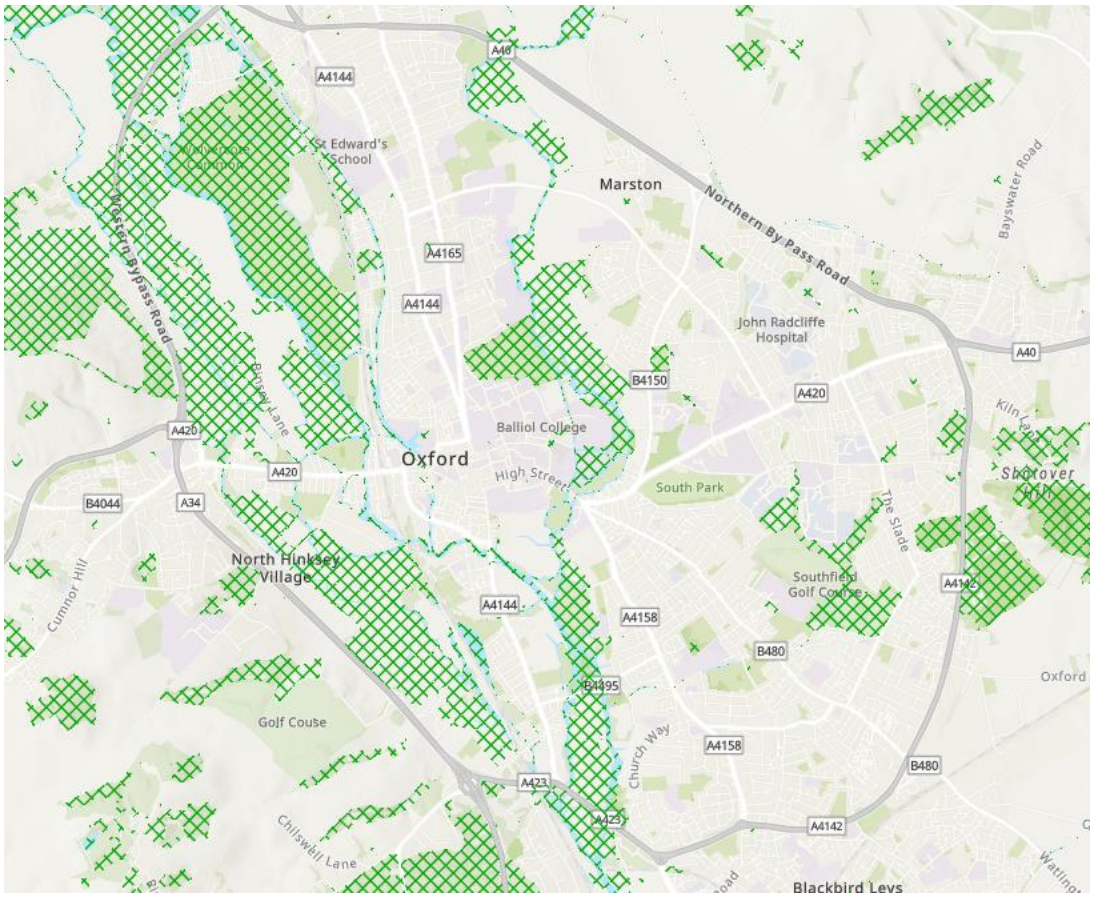
5.11 A key driver in identifying and protecting a network of core spaces across the city was the understanding that many of their benefits need to be retained in situ and are very challenging to relocate. In this context, officers have considered a number of specific factors relating to key multi-functional benefits that arise from the situation of certain spaces and broadly fall under three topics: heritage, biodiversity and climate change. The remaining spaces not already within core network were assessed in terms of their contribution to these benefits and allocated to core where they met the following criteria:

- Biodiversity – has the space been identified as containing a significant amount of core habitat (more than 50% of the site) within the Oxfordshire Nature Recovery Network and is it also connected to other spaces and clearly forming part of a wider wildlife corridor through the city?
- Heritage – is it a Registered Park and Garden or has the space been identified on the Oxford Heritage Asset Register as a local green feature of significance?
- Climate change – has the space been identified as containing a significant amount of land within flood zone 3b (more than 50% of the site) and therefore acting as important source of flood storage?

5.12 Appendix B of this background paper (contained in a separate document) details all sites added into the core network and the rationale for why they have been assigned to this level of the network.

5.13 For reference, the Oxfordshire Nature Recovery Network (Figure 5.2) was identified in advance of work on the Local Nature Recovery Strategy and the Council has utilised it in informing core designation in the GI network because it takes into account a wider variety of biodiversity considerations than the LNRS, including areas of ecological interest such as Sites of Special Scientific Interest, Local and National Nature Reserves, Wildlife Sites (Local, District, and City), as well as various reserves, woodlands, TVERC's priority habitat mapping and other protected sites. The Council has cross-referenced with the Oxfordshire County Council LNRS mapping to ensure any identified existing sites of particular importance for biodiversity are also incorporated.

Figure 5.2: TVERC Nature Recovery Network (NRN) core zones – which contribute to designation of some 'core' spaces (where they also clearly form part of a wider ecological corridor), where the core zone exceeds 50% of the site Council (© Crown Copyright and database right 2025. Ordnance Survey AC0000808820.).



Identifying additional supporting spaces in the GI network

5.14 There were a number of other types of green space which did not meet the standards for core protection set out in the preceding paragraphs but were still deemed important enough to be classified as supporting spaces to the network. Typically, these were spaces which could feasibly be reprovided to another part of network if necessary and were typically of a more limited wider benefit to the area in terms of functionality or public access but still played some function that supports the wider area and that would need to be replaced.

5.15 Sports pitches, for example, are an important asset to supporting health and wellbeing through providing formal spaces for recreation. Whilst reprovision of any losses will often be an important consideration (which the supporting tier of the network would require),

these spaces typically offer fewer wider benefits to warrant core protection (unless they met one of the additional considerations in para 5.11).

5.16 A number of spaces with no fixed role, including amenity spaces and private outdoor spaces, were also added to the supporting tier where they were of a significant enough size. As was found in the 2022 GI study, typically larger areas of green space are able to perform a wider variety of positive functions for the city than smaller ones, though there may be exceptions. These spaces can make a valuable contribution to greening the urban realm in general and can have potential for enhancement in future.

5.17 Amenity green space (areas of informal grass with limited features) were included within the supporting tier where they exceeded a size threshold of 0.15ha, which was deemed significant enough to be of benefit to the local environment. Private green spaces were included within the supporting tier based upon a size threshold, however, due to their restricted public access benefit this was only where they exceeded a size threshold of 0.3ha.

Enhancing and providing new Green Infrastructure in Oxford

5.18 A key driver behind the policies of the new Local Plan is encouraging green and blue infrastructure to be considered with equal importance and value to more traditional grey infrastructure provision. Whilst policy G1's hierarchy of protection seeks to ensure that we retain our highest quality GI in the city and supports the objective of retaining opportunities to enhance what we have, policies G2 and G3 then set out the framework for how we expect to see enhancement and new provision take place.

5.19 Principally, policy G2 requires applicants to consider not just the provision of features on the site but also how they connect in with features around the site to deliver greater interconnectedness with the wider GI network. This is important for building resilience into the GI network, reducing fragmented landscapes and supporting movement of people and wildlife across the city. Equally, policy G2 sets out the importance of a design rationale which looks for ways to secure multi-functionality. It sets out various functions that are considered important such as supporting biodiversity, building climate resilience and providing spaces for people, which should guide design beyond purely aesthetic concerns. To be most effective at fulfilling multi-functional roles, these have to be taken into account in informing the design of green spaces/features from the beginning, rather than as an afterthought. Where reprovision is required to accord with loss of protected space under policy G1 – the requirements of G2 guide how we expect the reprovided GI to be delivered.

5.20 There are some other elements to the policy that address more specific situations. For example, recognising that our blue spaces are an integral component to the city's landscape and that in places the connection with our watercourses has been degraded over time which can lead to negative impacts for the water environment, Policy G2 also

sets out specific expectations in relation to development that occurs adjacent to watercourses. It sets out that new development adjacent to these spaces incorporates a sufficient buffer to mitigate negative impacts on them and also help to enhance the environment in these areas. Where the land alongside our watercourses has already become urbanised the policy requires that buffers ideally be reinstated.

5.21 The policy also sets out requirements for new open space on larger developments. Whilst our analysis of the city through the GI study 2022 and of the existing development sites over the Local Plan period suggest that opportunities for the creation of large-scale new open space is limited by various constraints, open space is an important component of healthy, well designed development and where possible this needs to be incorporated within the site layout of larger schemes. The new Local Plan therefore retains the existing requirement for 10% open space to be delivered on larger developments of 1.5ha and above.

5.22 Where green features are included in a development, it is important to recognise that these are live components of a design which are subject to varying levels of ongoing care and maintenance. A successful development is one that considers these longer-term needs and plans accordingly for them as part of the design process. Certain features like trees have a crucial establishment window which requires more intensive care and attention in terms of watering to ensure the longevity of these features going forward. Meanwhile, other features like green walls and roofs require more regular watering and maintenance throughout their lifetime to avoid failure due to their more exposed and unnatural planting location. With climate change and longer hot/dry conditions in future these demands are likely to increase. The policy therefore sets out specific requirements for ongoing maintenance/management arrangements which need to be included as part of the applications, along with conditions that will be set for replacement of failed specimens during the establishment period post- construction.

Urban Greening Factor for major development

5.23 As has already been identified, Oxford's constrained nature makes the delivery of new green spaces of notable size within the city boundary challenging to achieve. There are also parts of the city that are more densely developed and deficient in green spaces in terms of their size, accessibility and quality. It is therefore crucial that in areas where new development comes forward, all opportunities are taken to maximise the amount of greening within the site. This also supports other objectives such as making space for nature and building resilience to climate change (through reducing surface water flood risk and risk of overheating in summer). Whilst the scope of policy G2 sets out principles and requirements in this regard that apply to all scales of development, policy G3 introduces additional requirements of major development in the city in the form of the Urban Greening Factor (UGF) assessment.

5.24 The UGF assessment process produces a score for the proportion of urban greening in comparison to the total area of a given development site. The calculation focuses on the types of surface cover used within the landscape of the site and is measured for the existing situation and post development conditions following building and landscape proposals. Each surface cover type is assigned a weighting factor (between 0.0 to 1.0) that reflects its environmental and social value in urban greening; its functionality in providing ecosystem services, including improving permeability; and its benefit in supporting biodiversity and habitat creation.

5.25 The benefit of the UGF process is that it provides a simple means of quantifying the changes in amount and type of green surface cover delivered through a development in a transparent way. Whilst certain types of more natural surface cover are incentivised through the UGF, applicants have flexibility in how they meet the policy requirements for post- development score and can freely pick the proportions of different surface cover types to best fit their site's constraints. This is particularly important in addressing the constrained nature of many sites in the city, balancing out the space demands of various policy requirements in the Local Plan, and viability challenges of delivering development.

5.26 Whilst the UGF process involves the use of an area-based metric which has similarities to the Statutory Biodiversity Net Gain metric that applicants will be required to complete as part of Biodiversity Net Gain (BNG), the two tools have different roles in meeting the Local Plan's objectives. The BNG metric works as an uplift in score for a site (a 10% improvement on current score) and is focused primarily on habitat creation for biodiversity. Meanwhile, the UGF sets out a minimum target and is focused on delivering multi-functional green features which could provide for biodiversity but also many other benefits. On particularly urbanised sites lacking in existing habitat, a 10% uplift in a low score as required by BNG may have relatively limited effect, whilst the UGF instead requires sites to meet a minimum score based upon the combination of surface covers as a proportion of overall site area. Meeting the UGF requirements can of course support biodiversity objectives of the Statutory BNG Metric (and vice versa).

5.27 In formulating the specific requirements of policy G3 the Council has adopted the list of surface cover types and individual scores recommended through Natural England's guidance, which applicants will be required to utilise in their assessments (Table 5). Natural England devised these different weightings in order to maximise multi-functionality of green infrastructure in urban areas and benchmarked them against their Environmental Benefits from Nature tool which assigns values to different habitats based on the ecosystem services they provide. As the intention is to provide a consistent approach across England and in discussion with Natural England, the Council deemed that it was unnecessary to amend the weightings further.

No.	Surface Cover Type	Facto
1	Semi-natural vegetation and wetlands retained on site (including existing / mature trees)	1.0
2	Semi-natural vegetation established on site	1.0
3	Standard / semi-mature trees (planted in connected tree pits)	0.9
4	Native hedgerow planting (using mixed native species)	0.8
5	Standard / semi-mature trees (planted in individual tree pits)	0.7
6	Food growing, orchards and allotments	0.7
7	Flower rich perennial and herbaceous planting	0.7
8	Single Species or mixed hedge planting (including linear planting of mature shrubs)	0.6

Table 5: A selection of the surface covers and their weightings from the Natural England UGF tool – the full list is included in the Appendix of the Local Plan – any updates will be published in the Green Infrastructure and Biodiversity TAN in future.

5.28 In relation to the specific targets new development will need to meet in Oxford, whilst Natural England also set out recommendations in this regard (e.g. 0.4 for residential and 0.3 for non-residential), an additional assessment of the local context and other aspirations in the Local Plan have helped informed the targets for policy G3. Sites in Oxford are particularly constrained by a variety of pressures whilst the Local Plan also includes a variety of policies which will put additional demands on the layout of development sites. As such, high level testing of the UGF assessment was carried out on proposed allocated sites in the Local Plan to understand how these sites currently score and what could practically be achieved. This testing process has led to slightly reduced targets for major development (0.3 for residential sites and 0.2 for non-residential), except for wholly greenfield sites. The policy also includes requires that proposals should not result in a reduction in the baseline score, meaning sites that already exceed these targets (e.g. greenfield), will need to maintain these scores as a minimum (no net loss).

5.29 On wholly greenfield sites, the policy does acknowledge that no reduction in baseline score may not always be feasible, particularly where there are limited opportunities to enhance parts of the site further to mitigate losses elsewhere on the site. Applicants will need to justify where this is technically not feasible, such as by setting out how they have tested different layouts of the site. These sites have a higher minimum target that must be met, however, in recognition of the higher level of greening they are starting from. Other policies, such as Policy G1 will also remain relevant, meaning higher quality elements on the site, such as

mature trees should be retained regardless (subject to the requirements of that policy).

5.30 The testing process on allocated sites enabled officers to identify existing natural features on site, particularly those that are of sufficient quality to contribute to the UGF score and compatible with the design-led approach to writing the allocations policies. Whilst the overarching targets of policy G3 apply to all sites, where applicable, such features have been highlighted in the allocation policy as part of the overall guidance on natural features and placemaking. They are written in such a way as to not be unduly prescriptive, which should give allowance for applicants to explore appropriate design solutions and engage with council officers.

5.31 The overall approach is considered to be most pragmatic for the local circumstances of the Oxford, given that it is a new policy addition which is based on relatively new UGF standards from Natural England. It will ensure that green infrastructure provision is appropriately considered in all major development (with encouragement for its application on other types of development), that provision is quantified helping to understand net change and achieves a realistic minimum baseline, whilst also leaving flexibility for applicants to tailor their approach to the particular circumstances of their sites. The approach can be tailored in future iterations of the Local Plan based upon how the new approach performs.

Appendix A – Regulation 18 Policy options sets

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

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

Table 1 - Policy options set 005a: Protection of GI network and green features

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

a network means that it would be challenging for them to be replaced elsewhere).	The city is limited in its green infrastructure, particularly open space. Once open space is lost, it can be very difficult to reprovide. Beginning from a standpoint that all spaces are valuable and should be protected in themselves helps to recognise this challenge. Protecting open space regardless of quality recognises that every space has the potential to make an important contribution to health and wellbeing as well as wider sustainability, particularly to the local area.	green spaces unless they are shown to be surplus or can be re provided.
Option b Set out a hierarchy of protection that will be accorded to spaces comprising the identified GI network. Hierarchy will focus on protection from loss to development and will rank from protection from all development other than in	Gives further clarity than option a, and provides opportunity to identify higher quality, strategic and multifunctional sites and prioritise these for protection over sites that have less adverse impact if lost to development.	Categorising sites may be subjective exercise and run risk of depriotising spaces that may still bring about benefits.

exceptional circumstances, to permitting development with reprovision of spaces to a similar standard, to protection of spaces to the minimum standard as set by national policy.		
Option c In addition to the network, have a series of separate policy protections based on different types of greenspaces (e.g. outdoor sports, designated ecologcial sites, allotments and greenbelt) and address each specifically. Note that none of these designated sites are considered surplus.	This option could allow bespoke policy approaches to specific types of green space and any unique needs/concerns.	This approach may add a level of confusion where there are protections of a particular category both within and outside of the network (for example some outdoor sports pitches may be a multifunctional part of the network and others may have protection only as outdoor sports).
Option d Only allow the loss of trees, hedgerows and woodland where it is clearly justified (level of justification to be considered against quality of tree) and any loss mitigated. Require developers to demonstrate how the	Trees perform several important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of	Where high quality trees are already protected by Tree Preservation Orders, additional tree protections could be considered too onerous in the development of particularly constrained sites.

retention of existing trees/hedgerows and the planting of new trees/hedgerows has been considered (applying BS.5837:2012 Guidance or future equivalent) in the design and layout of new development and outside space. This should include protection and/ or enhancement of tree canopy cover. Planning permission will not be granted for development resulting in the loss or deterioration of ancient woodland or ancient or veteran trees except in wholly exceptional circumstances.	established trees and to incorporate the planting of new trees. Tree canopy cover often has the biggest impact on setting and as such that correlates to the benefits that trees can bring. Some high-quality trees are protected by Tree Preservation Orders (TPOs), but this relies on the City Council having been made aware of them and designating in this way. It is unlikely that all high-quality trees in the city are protected in this way however, thus many will not benefit from TPO protection.	
Option e Do not define a network of green spaces but assign individual protection to larger strategic sites including public parks, biodiversity sites, allotments, cemeteries and	This option recognises that there are key areas of open space with value to supporting health and wellbeing in the city. These larger spaces are likely to have more capacity	Green infrastructure works best when thought of as an interconnected network, which this approach would ignore. Smaller spaces and linear features contribute to and enhance larger spaces, as well having an equally important role in supporting day-to-day wellbeing – breaking up urban environment, supporting climate resilience, creating wildlife corridors and encouraging active travel.

outdoor sports, with sets of criteria relevant to each. Include the wording from the NPPF that sets out protection for all green spaces unless they are surplus or can be reprovided.	for enhancement than smaller ones too. It would ensure that key areas are identified and protected across the city whilst diverting development pressure away to poorer quality areas or areas that provide less benefit overall.	
Option f Do not include a policy protecting green and blue infrastructure and defer to national policy/standards.	National guidance on GI standards is developing, including the full launch of the Natural England GI Framework later in 2022.	Relying on national standards for green infrastructure provision could risk ignoring local contextual issue and priorities which a local policy can help to address.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options or combinations e.g. option A or B, A+C, B+C, A+B+C, A+B+C+D, A+D, B+D, E, F) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, **7. Green Infrastructure,** and to **10. Biodiversity**. There is also some relevance to criterion **3. Efficient use of land,** as the use of designations and protections that restrict development on greenfield land. All options are going to score positives for criteria 2, 3, 7 and 10, apart from option g (no policy – defer to national policy/standards) which would score neutral. All other options seek to put in place some form of baseline level of protection on all green spaces, creating designations dependent on the function or type of green space, and restrictions. The differences between

the policies are of degree and extent. The extent of the positive impact of these options will depend largely on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Protection of Green Infrastructure network and features – Policy G1

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of aspects from options **A, B, C** and **D.** This combination of options establishes the principle of a city-wide connected green infrastructure network made up of spaces and features of different scales and type, that will be subject to varying levels of protection. This approach is considered the most effective way of protecting all public and private green infrastructure in the city from inappropriate development and mitigating the impact on green spaces of development in general. Policy can establish a hierarchy of protection for all green spaces in the city, which can identify spaces that are particularly important to the city in terms of their function, historical significance or local amenity and where needed can ensure levels of protection that go beyond what is stated in national policy. This approach would allow us to set out the specific conditions under which certain types of green space may be lost to development, and measures to mitigate the impact of such losses including reprovision. The approach would also recognise importance of trees and set out expectations for developments that might impact them.

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

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

Table 2 - Policy options set 005b: Provision of new GI features

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

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

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

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? Various options (A, B, A+B, C, D) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective. **Screened in for detailed appraisal?** No **Rationale:**

In terms of sustainability criteria that are relevant to the options, these are most directly relevant to criterion **2. Resilience to climate change**, and **7. Green Infrastructure**. There is also some relevance to criterion **10. Biodiversity.**

All options are going to score positives for criteria 2, 7 and 10. because they seek to bring in additional greening as part of new development, apart from option g (no policy – defer to national policy/standards) which would score neutral. The differences between the policies relate to how the additional greening is delivered and how the amount is determined. The extent of the positive impact of these options will be dependent on the implementation. Overall, it is considered that the sustainability impacts from the options do not differ enough to warrant them being scoped in for detailed appraisal.

Enhancement and provision of new Green Infrastructure Features – Policy G2

The preferred approach for the Local Plan 2045 draft policy is to take forward a combination of options **A** and **B**. Policy would set out requirements for green and blue infrastructure features to be associated with new development schemes, and where there are existing GI features for these to be enhanced. The approach will allow for specific requirements for new or enhanced features as applicable to the parameters of the site and its context. Specific amounts of open space provision will only be required for large sites. The combined approach will allow for some degree of flexibility with respect to requirements depending on the parameters of the site, while ensuring that GI forms a fundamental element of development schemes coming forward.

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

- At its most basic, the Urban Greening Factor (UGF) is a policy tool that provides a way of simply quantifying green surface cover on a given development site via a metric system. UGF schemes have been applied in several cities through planning policy including the London Plan and the Southampton Local Plan. The methodology is also one of the Headline Standards that form the basis of the Natural England Green Infrastructure Framework.
- The UGF can be used to quantify in simple terms the amount of green infrastructure being proposed as part of a development scheme. Policies that incorporate the UGF can require proposals to secure a certain target, or to simply demonstrate a betterment in score compared with the existing site. The use of the UGF is intended to achieve separate objectives to biodiversity net gain, though it will be mutually supportive. Instead, the key intent of the UGF is to help address a variety of

wider place-making and environmental issues, for example, making spaces that are more pleasant for people, as well as delivering resilience/adaptation to climate change (more green infrastructure can improve flood resilience and reduce urban heat).

- Requiring applicants to use an UGF could be a useful way of improving the way that green infrastructure provision on sites is quantified. The policy options below set out possible approaches for applying the tool in the Oxford context and have been developed with consideration of the strengths and weaknesses of the methodology.

Table 3 - Policy options set 005c: Provision of new GI features – Urban Greening Factor

Option for policy approach	Potential positive consequences of the approach	Potential negative/neutral consequences of the approach
Option a Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development	Would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. UGF tools are quick and simple to use and to be understood by a range of users, they can assist in discussing and visualising levels of greening on a site. Could be well suited to more constrained sites due to promoting use of often wasted spaces such as walls and rooftops.	The simplicity of UGF tools means they are fairly limited at distinguishing quality/condition of greening measures. Where designs incorporate more complex features, their suitability will still need relevant expert assessment for quality/management etc. as with any other application. They are not a replacement for ecological analysis and associated metrics such as DEFRA Biodiversity metric. The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, but it would be an additional ask of applicants.

Option b The scale of application of the UGF tool could be across select sites/ areas of the city, whilst its use is encouraged but not mandatory elsewhere. Potential areas of application could be: • Major applications • Specific site allocations which are not already sufficiently green. • Retail/district centres • Areas of deficit of green surface cover and/or heightened climate risk.	This avoids unnecessary work by avoiding areas that are already particularly green. It is sensible to target the approach to areas in the city where the use of the tool and securing betterment would be required.	Could be missing out on opportunities to promote greening elsewhere in the city – encouraging the tool's use may not be strong enough to get applicants to use it elsewhere.
Option c Incorporate the use of an Urban Greening Factor (UGF) into policy with bespoke higher scoring for areas of the city identified as a priority greening area - determined by the level of deficit of green surface cover and/or heightened climate risk.	This can secure targeted betterment in areas where there is a clear deficit of green space and potentially reducing the greening requirement on developers for schemes in areas that are already particular green.	Oxford is highly constrained and has a high level of density in some areas. Desktop assessment already indicates what is likely to be an achievable threshold of UGF score, which is lower than the NE baseline. Development sites tend to be fairly small and compact particularly in dense areas where there is deficiency in green space. Achieving higher bespoke scores in areas where there is already deficiency will be difficult and potentially unviable – testing

Option d The scale of application of the UGF tool could be mandatory across all developments in the city.	The ease of use of the tool and the non-prescriptive requirement of simply achieving betterment (leaving a site greener than it started) could be quite easily applied to many areas.	Some sites in the city are already quite green and achieving betterment could be difficult to achieve/of little value. The tool is better suited to harder, grey areas with little greening at present. The tool does not distinguish between quality/condition in detail, therefore, there is a risk that on particular green sites, the policy requirement could promote replacement of existing established/quality features for other poorer quality features.
Option e Do not incorporate an UGF into policy	The tool would be an additional metric to be completed by applicants alongside the DEFRA Biodiversity metric. The two tools have differing but complementary aims, however, it is an additional ask of applicants.	The tool is a simple and practical way of quantifying and better negotiating net gains in greening on sites which has a range of benefits including climate adaptation, mental and physical health and wellbeing and biodiversity.

Initial sustainability appraisal screening of options sets
Is there only one option or are there various options we could take? various options (A, A+B, A+C, A+D, E) **High-level screening conclusion?** the options are similar to each other from a sustainability perspective **Screened in for detailed appraisal?** No **Rationale:** The options relate to whether or not to include policy requirement for undertaking an urban greening factor assessment (option a) or not (option e), as well as various options for the scale of application to which such a requirement would be applied (options b, c and d).

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

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

The preferred approach for the Local Plan 2045 draft policy is to take forward **option B**. This option will incorporate the use of UGF into policy and the use of the tool will be encouraged for all developments, however its mandatory use will only be required for a selected category of development. This approach will enable targeting application of the methodology to where the most benefits may be accrued, for example development types that present opportunities to secure significant betterment in green surface cover or areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.