Biodiversity Report

Final

12/03/2026

Contents

Executive Summary

The Environment Act (2021) strengthens the Biodiversity Duty of all public authorities, by placing a responsibility to enhance, as well as protect biodiversity in actions and decision making.

The strengthened Biodiversity Duty indicates that as a local authority Oxford City Council must:

1. Consider what it can do to conserve and enhance biodiversity.
2. Agree policies and specific objectives based on its consideration.
3. Act to deliver biodiversity policies and achieve objectives.

The Duty was also amended to require local authorities to publish a Biodiversity Report by the end of March 2026 (See Guidance: Reporting Your Biodiversity Duty Actions), which should set out biodiversity policies and actions carried out to comply with the Biodiversity Duty between 1st January 2023 to 1st January 2026.

The contents of this report set out Oxford City Council's actions to protect and enhance biodiversity to date (1st January 2026). The report also documents implementation of Biodiversity Net Gain across the city since its introduction in 2024. Finally, this first Biodiversity Report sets out a framework for a future Strategy; with policies and objectives following as soon as possible during 2026. The principal vehicles for this will be the new Local Plan and developing Biodiversity Strategy (which is planned to be commenced during 2026).

1.0 Oxford City Council and the Biodiversity Duty

1.1 Introduction

This report provides a briefing on the Biodiversity Duty responsibility placed upon Oxford City Council by the Natural Environment and Rural Communities Act (2006) as amended by the Environment Act (2021). The report covers actions to fulfil the first reporting period from 1st January 2023 to 1st January 2026 , in accordance with legislation and UK government guidance. This takes forward Oxford City Council' first consideration report – 2024 (see Section 2.2).

1.2 Oxford City Council: Our Area

Oxford City Council is a local authority within the County of Oxfordshire. Oxford has a total area of approximately 46 sq km (17.6 sq miles). While parts of this urban area are very densely developed, 52% of the city is actually open space. Some 27% of Oxford is in the Green Belt, with much of this land being flood plain. The historic city parks and nature conservation areas (including a Special Area of Conservation (SAC) and several Sites of Special Scientific Interest (SSSI)), together with city parks create pockets and corridors of habitats within the city boundary.

The Local Nature Recovery Strategy indicates that there are Areas of Particular Importance for Biodiversity, with parts of the city having potential to become areas of particular importance for biodiversity (see Section 3.8).

1.3 Defining Biodiversity

Within the Adopted Oxford Local Plan 2036, 'Biodiversity' is defined as "*the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.*"

The definition echoes the Convention on Biological Diversity (1992) adopted by the British Government, with reference made to the Convention within the Environment Act (2021):

'*The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes*

of which they are part; this includes diversity within species, between species and of ecosystems.' UK Biodiversity Action Plan (1994).

An initial indicator of Oxford's biodiversity is provided by the number of international, national and local nature conservation sites within the Council boundary:

- 1 European site for nature conservation (177 hectares)
- 12 Sites of Special Scientific Interest (278 hectares)
- 3 Local Nature Reserves (7 hectares)
- 14 county Local Wildlife Sites (125 hectares)
- 50 Sites of Local Importance for Nature Conservation (202 hectares)[1]

1.4 Environment Act (2021)

At national level, the Environment Act (2021), Sections 1 and 2, sets-out government's role in establishing Environmental Targets in priority areas: air quality, water, resource efficiency/ waste reduction and biodiversity. A regulatory framework is used to deliver these targets with reporting duties on progress made every 12 months (Sections 6 and 9). The act establishes an Environmental Improvement Plan for the country (Section 8) which the government has based upon *A green future: our 25 year plan to improve the environment* (The 25 Year Environment Plan).

Part 6 of the Act defines the role of Local Authorities. It establishes Biodiversity (Net) Gain (BNG) as a condition of planning permission through Schedule 7A of the Town and Country Planning Act (1990) or Schedule 2A of the Planning Act (2008); together with the BNG Hierarchy. Part 6 also establishes Local Nature Recovery Strategies (LNRS) and co-ordinates the duty of public authorities with the relevant strategy: in this case the Oxfordshire's Local Nature Recovery Strategy.

1.5 The Biodiversity Duty

Importantly, Section 102 of the Environment Act amends Section 40 of the Natural Environment and Rural Communities (NERC) (2006) Act so that a Local Authority, as a public body, has a *Duty to conserve [and enhance] biodiversity* through the *exercise of it functions*: the General Biodiversity Duty. Section 40 of NERC, as amended, enables authorities to consider and amend policies and objectives to further the duty every 5 years. In doing so, the authority must have regard to the Local Nature Recovery Strategy and any relevant Natural England

[1] Biodiversity in Oxford | Oxford City Council

species conservation and protected site strategies. Compliance is guided by information issued by the government: Complying with the Biodiversity Duty.

In summary, Guidance from the Department for Environment, Food and Rural Affairs (DEFRA)[2] states that:

- *The end date of your first reporting period should be no later than 1 January 2026.*
- *After this, the end date of each reporting period must be within 5 years of the end date of the previous reporting period.*
- *You must include the start and end dates of your reporting period in each report.*
- *You must publish all reports within 12 weeks of the reporting period end date.*

NERC (2006) as amended by the Environment Act (2021) indicates that legally the biodiversity duty report must include:

- *a summary of the action an authority has taken to comply with the biodiversity duty.*
- *how the authority plans to comply with the biodiversity duty in the next reporting period.*
- *any other information you consider appropriate.*

Reports from local planning authorities must also include the following Biodiversity Net Gain (BNG) information:

- *the actions you've carried out to meet BNG obligations.*
- *details of BNG resulting, or expected to result, from biodiversity gain plans you've approved.*
- *how you plan to meet BNG obligations in the next reporting period.*

1.6 Reporting Period and Contents

Since 1st January 2023, the Biodiversity Duty applies to all public authorities. These had 12 months (i.e. until 1 January 2024) to consider how they will comply with this duty and the actions they can take. Thereafter, authorities must set appropriate policies and specific objectives; and then implement actions. Realising the importance of the Act, Oxford City Council produced the "*Implications of the Environment Act for Oxford City Council"* report.
In 2024, government published further guidance setting out Biodiversity Duty reporting requirements of the act: Reporting your biodiversity duty actions. The first biodiversity report must cover a reporting period of no more than three

[2] Defra guidance: https://www.gov.uk/guidance/reporting-your-biodiversity-duty-actions

years, ending no later than 1 January 2026, with the report being published within 12 weeks of the end date (i.e. a publication deadline of 26 March 2026).

Local Planning Authorities are legally obligated to ensure the report contains the following information in three required sections:

- A summary of action the council has taken to comply with the Biodiversity Duty (Section 2)
- Any other information the council considers appropriate (Section 3)
- How the Council plans to comply with the biodiversity duty in the next reporting period (Section 4)

Reports from local planning authorities must also include the following Biodiversity Net Gain (BNG) information:

- the actions the council carried out to meet BNG obligations (Section 2.11)
- how the council plans to meet BNG obligations in the next reporting period (Section 4.7)
- details of BNG resulting, or expected to result, from biodiversity gain plans the council has approved (Section 5)

2.0 Policies, Objectives and Actions

2.1 Introduction

The following section sets out the current (since 2023) policies and objectives for meeting the biodiversity duty.

2.2 First Considerations

The immediate action by Oxford City Council was to undertake a "first consideration", in accordance with the guidance, to identify the work of Oxford City Council that contributes towards the conservation and enhancement of biodiversity. The final *Report on First Consideration of Oxford City Council's Biodiversity Duty* was published in July 2024. This report highlights the main areas of the Council's work that initially helped to deliver the 'biodiversity duty' prior to and following the Environment Act (2021) amendments to NERC (2006). It includes the conservation and enhancement actions provided by the:

- Green Spaces Strategy (2013-2027)
- A Biodiversity Action Plan for Oxford City Council (2015 – 2020)
- Biodiversity Review for Oxford City Council Parks and Nature Areas 2020
- Review of Biodiversity Action Plan (Sept 2023)
- Oxford Urban Forest Strategy: A Master Plan to 2050
- Oxford Local Plan 2036 (currently being revised)

Activity then moved into hiatus due to staff resourcing, caused in no small part by competition for ecological expertise because of the Environment Act (2021), with a new permanent Ecology team appointed in June 2025. Since this time, work of the team has prioritised statutory/regulatory duties, primarily focusing on ensuring planning applications and decisions incorporate protected species/habitats and BNG requirements: with enhancement focusing on measures to enhance species and habitats identified under the Wildlife and Countryside Act (1981), Habitats Regulations (2017) and Section 41 of NERC (2006), and ensuring compliance with the Oxford Local Plan 2036. In October 2025, action was commenced to collect statistics on these actions.

The following section sets out policies, objectives and actions active within the 2023 to 2026 reporting period.

2.3 Oxford City Council's Biodiversity Policy

Core Strategy 2011-2026

Policy CS12 of the Oxford City Council Core Strategy set out the council's biodiversity policy for the 2023 to 2026 reporting period. The policy was to

provide a hierarchy of protection for Oxford's biodiversity resource, and to protect and (where there was opportunity) enhance Oxford's biodiversity. The Core Strategy was, however, superseded by the Oxford Local Plan (see Section 2.4).

2.4 Adopted Development Plan (Oxford Local Plan 2020-2036)

The statutory Development Plan for Oxford sets out agreed planning policies for the city against which planning decisions are made. The Oxford Development Plan consists of the Local Plan 2036, site specific Area Action Plans and Neighbourhood Development Plans.

Protection of biodiversity within Oxford centres on Policies G1 and G2, although the Local Plan takes account of biodiversity, linked to ecosystem services and natural capital across a number of policy areas (see below). Given the urban area of Oxford, the Local Plan recognises the close proximity of the community to areas of biodiversity value and the worth of green spaces in not only providing recreation, health and wellbeing; but also, opportunities from the network of open spaces to promote biodiversity and assist in climate change adaption.

The plan also recognises that sites of local, national and international importance for biodiversity need protection, particularly in respect to housing/ homes, sustainable design/ construction and land use (see Policies H12, H13, RE1and RE9). The plan recognises that a combined network of green and blue infrastructure (rivers and wetlands) provide multiple benefits for water management, air quality, wellbeing, amenity, recreation, heritage, jobs, tourism and the wider social, environmental and economic functions of Oxford, with Policy G7 setting out the need to protect Green Infrastructure (specifically, trees, woodland and hedgerow), providing a link to Section 41 of NERC (2006) priority/ principal habitats of conservation importance. In general, the plan identifies the importance of green and blue spaces such as the Green Belt, recreational areas, allotments, watercourses, etc (see Policies G1, G2, G3, G4 and G5). Potential benefits from biodiversity to employment sites are also recognised within Policy E1 for poorly performing Category 3 Employment Sites.

Policy G2 incorporates protection of statutory biodiversity sites of national and international importance: Sites of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC) in accordance with the Wildlife and Countryside Act (1981), as amended and the Habitats and Species Regulations (2017). The policy also applies the mitigation hierarchy to development, as set out by the National Planning Policy Framework (NPPF), to Local Wildlife Sites (LWS), Oxford City Wildlife Sites (OCWS) and Local Geological Sites (LGS).

Policy G2 pre-dated statutory BNG requirements established by the Environment Act (2021), but did require new development to incorporate measures to enhance biodiversity, including net gain. As a result, prior to the enactment in England of BNG (February and April 2024) requiring a net gain of 10%, Oxford City Council had already placed a requirement for 5%, using the compensatory provision of the NPPF mitigation hierarchy. There is also a link between development compensation, and enhancement, for loss of biodiversity through Policy G6 in respect to residential garden land where planning permission is required.

Specific policy development for Ecosystem Services in respect to trees, woodland and enhancement of canopy cover is identified by Policy G7. The Plan also identifies specific biodiversity enhancement measures to be considered by planning applications: such as bird and bat boxes, and landscape planting to create wildlife corridors. Additionally, the Local Plan identifies green and brown roofs/ walls as biodiversity enhancement features within new developments. Policy G8 highlights the importance of including such biodiversity enhancements within supporting Design and Access Statements (see also Policy DH1 and Appendix 6 of the Local Plan) and to create linkages to the wider Green Infrastructure Network and surrounding countryside.

The local plan also links retention and enhancement of biodiversity to design and placemaking of new development (Policy DH1)

In addition to Policy G8, areas allocated for development have specific biodiversity related policies. These include: Oxford Business Park (Policy SP10), Knights Road (Policy SP15), and Government Buildings and Harcourt House (Policy SP16), Pear Tree Farm (Policy SP28), Land East of Redbridge Park and Ride (Policy SP29), St Catherine's College Land (Policy SP30), Bertie Place Recreation Ground and Land Behind Wytham Street (Policy SP32), Former Iffley Mead Playing Fields (Policy SP38), Land at Meadow Lane (Policy SP42), Littlemore Park (Policy SP44), Pullens Lane (Policy SP53) . The biodiversity aspects of these policies centre on the assessing biodiversity and mitigation, which are normally legal requirements or established under the NPPF. It is notable that improvements related to better connectivity and wildlife corridors, although mentioned in the Local Plan text are not incorporated into the policy text (e.g. Policy SP22: Warneford Hospital); whilst the NPPF does encourage the creation and protection of ecological networks and wildlife corridors.

Policies have also identified biodiversity enhancements at specific sites, including: hedgerows and native planting (Policy SP24: St Frideswide Farm), although this is not always consistently applied, e.g. Policy SP26: Land west of Mill Lane.

More detailed information on consideration of biodiversity in the planning process for Oxford can be found at: Biodiversity in the planning process Oxford City Council

Information to applicants is also provided by a series of Technical Advice Notes (TANs). TANs 8, 9 and 18 provide further related information on Biodiversity, Green Spaces, Biodiversity Net Gain and the Local Plan.

2.5 Biodiversity Action Plan Review (2023)

Outside of the reporting period for this document, Oxford City Council developed a Biodiversity Action Plan (BAP) for the period of 2013-2020. The Council undertook a review of the BAP in 2023, which falls within the period of reporting actions which contribute to the Biodiversity Duty.

The review sets out the Council's green resource of 600 hectares of green space that include:

- One countryside park (Shotover)
- 33 countryside sites/nature areas (two managed externally under lease agreements)
- 62 urban parks and public gardens
- 29 allotments (all leased by individual associations)
- 4 Cemeteries

Within the City approximately 25% of the Thames riverbank in Oxford, together with parts of the River Cherwell, Castle Mill, Bulstake and Weirs Mill are owned by the City Council, **providing a significant potential resource as wildlife/ green corridors to maintain connectivity for biodiversity.**

Importantly, the review identified the greenspace management in Oxford for:

- Enhancing green corridors and wildlife connectivity between sites by increasing wider availability and range of habitat to address fragmentation
- Reducing fuel use and carbon emissions by reducing areas maintained as short grass through ten-day cyclical seasonal mowing (and staff resources)
- Reducing moisture loss of the ground during the increasingly hot, dry summers resulting from climate change by maintaining more areas of longer grass and other vegetational cover
- Reduce the need for regular watering of seasonal bedding plants during propagation and once planted by replacing them with more sustainable forms of planting
- Increasing the number and range of plants for pollinating insects

- Improving air quality by increasing vegetation and tree cover in the city

The review also identified the threat posed by invasive species such as the spread of Himalayan Balsam and Japanese Knotweed.

The review sets out the then current initiatives to support biodiversity and increase sustainability, including site management plans that should link to any further Biodiversity Strategy (see Section 4). These are detailed as a set of 12 priority projects and a number of smaller urban park projects. Collectively, these provide a framework for developing further actions.

2.6 Green Space Strategy (2013-2027)

To support the delivery of the Oxford Green Space Strategy (2013-2027), the City Council established a collaborative partnership to deliver the strategy in accordance with priorities of sharing best practice and developing joined up projects. These priorities are underpinned by funding and biodiversity.

Aim 4 of the Strategy seeks *to promote the central role that green spaces play in contributing to the city's biodiversity, sustainability, heritage and culture*. An additional purpose of the Strategy (linked to the initiatives Aim 6) is to engage communities in biodiversity projects for preserving the city's biodiversity (Objective 25).

The Action Plan for the Strategy (Section 9) with respect to Aim 4 provides a series of actions under Objectives 20 and 21. Results from these actions could form the basis for Biodiversity Indicators to inform future reporting.

Objective 21 of the Strategy establishes a framework to protect and enhance biodiversity with respect to international, national and locally important wildlife sites; develop a Biodiversity Strategy; create new and enlarge existing habitats, ensure the protection, enhancement and creation of wildlife corridors and protection of prosaic (endemic) species in all sites. This last point seeks to enable climate change resilience for range change species in accordance with the Lawton Review (see Section 3.4).

A link is also made between promoting biodiversity and the management of the City's allotments (Objectives 03 and 11), incorporating biodiversity into the design of parks and open spaces (Objective 11). The strategy has a future aim of fitting with an emerging biodiversity strategy for Oxford and the then established Oxfordshire (County) Biodiversity Action Plan. The Strategy also provides a framework for linking the management of the City's parks and open spaces to the authority's responsibilities under the Biodiversity Duty (Section 40, NERC (2006). In addition, the Green Space Strategy highlights **the need for a Biodiversity Strategy under the duty *to ensure a joined up approach to biodiversity***

through *effective partnership working and integrate biodiversity conservation efforts across the city*.

Section 9 of the Strategy sets out an Action Plan for delivery, together with details on Monitoring and Review via a panel of officers and key stakeholders. The panel produces an annual report which could provide indicators on progress of actions that link to the Biodiversity Duty. Alternatively, information to support the Biodiversity Duty Report could be generated through analysis of the milestones being reached under the *how are we going to do it* information in the Aim 4 table (pp 30-32 of the Green Spaces Strategy).

2.7 **Oxford Urban Forest Strategy (2021-2050)**

In September 2021, the Council adopted the **Urban Forest Strategy - a Master Plan to 2050** as a comprehensive framework for managing the urban forest of Oxford. The primary aim of the strategy is to maximise benefits for nature and all residents and visitors in Oxford. The strategy does cover elements of biodiversity but should not be viewed as a biodiversity strategy. Rather, it should be used in conjunction with a future Biodiversity Strategy, i.e. it is complementary. The strategy contains two biodiversity related aims to:

- maintain and enhance Oxford's Urban Forest to secure its biodiversity value and the ecosystem services which flow from it

- create a healthier place for people in nature and provide a richer biodiversity in deprived parts of Oxford

More detailed aims related to biodiversity include: habitat management, biosecurity, forest diversity, improve biodiversity and contribute to nature recovery areas (see Section 4.0) and increasing canopy cover (which provides a direct link to the national Environment Improvement Plan (2023), see Section 3.3.

The strategy also aims to mitigate the urban heat island effect (see below) of climate change through increasing the canopy cover of Oxford. Importantly, the Strategy also provides a biodiversity related monitoring indicator through measuring canopy cover every 10 years.

The strategy objectives do link to biodiversity benefits of woodland through:

- Larger, older trees sustain and enhance urban biodiversity when maintained in good ecological condition (Objective 1).
- Taking an ecosystem service approach that balances biodiversity, carbon storage and other ecosystem services helps to identify and prioritise the benefits (Objective 1).

With a dedicated objective to improve biodiversity and contribute to nature recovery areas (Objective 6) through:

- More, bigger, better, joined is the approach we need to take in order to halt biodiversity loss.
- Our urban forest can contribute to providing new habitat for wildlife and joining up habitats.
- Native species planting should be prioritised wherever possible.
- Where non-native trees are planted they should be near native varieties with edible fruit, seeds or nectar.
- Tree and vegetation management should consider biodiversity. E.g. leaving fallen and standing deadwood wherever possible for the biodiversity benefits it brings and reducing over clearance of vegetation such as shrubs.
- Tree planting can be detrimental to habitats with existing biodiversity value as non-woodland habitats such as fens and flower rich grassland.

A key element to the strategy is to ensure biodiversity is built into tree management plans and grounds management plans using best-practice guidance by landowners, land managers and businesses. This links to BNG provision in new developments. The strategy also identifies “tiny forest” initiatives at Meadow Lane Nature Reserve and Foxwell Drive; and the ongoing management of woodland at Shotover.

In October 2025 an Action Plan for delivery was produced which focuses on increasing canopy cover based on a “Canopy Cover Assessment” using the National Tree Map data methodology linked to GIS. The approach is used to identify priorities and show progress in comparison to historic data.

2.8 Grass verge management (2023)

In 2023, Oxfordshire County Council introduced a new verge maintenance policy, which resulted in grass verges in Oxford being cut once a year. Following significant public feedback and budget approval in February 2025, Oxford City Council funds two additional cuts for the majority of verges across the city, alongside the single cut paid for by Oxfordshire County Council. The cutting of verges, sits within a wider grass cutting schedule (2025) set out in the following table:

Table showing Grass cutting schedule for 2025

Location	Frequency of cutting
Roadside grass verges	Three times a year
Nine biodiversity verges: Abberbury Road Roundabout, Abingdon Road,Church Cowley Road, Eastern Bypass Central Reservation, Grenoble Road, Green Road, Marston Ferry Road, Oxford Road, Sunderland Avenue	Once a year in September – with grass cuttings collected
Communal gardens (Council housing)	Fortnightly between March and October
Parks and green spaces	Eight times a year
Sports pitches in parks	Maintained as short grass for sports matches during the football season from August until the end of May
Parish council areas	Varies by parish

As detailed, part of the schedule contributes to wildlife enhancement through the inclusion of nine biodiversity verges. The 'cut and collect' procedure for cuttings is to suppress grass growth and create the ground conditions favoured by wildflowers.

The grass verge management policy also identifies other council unquantified activity which may support biodiversity through:

- Dead wood habitats in parks and green spaces
- Informal long grass in selected areas of parks and nature areas
- Tree planting across the city
- Community orchards

2.9 Zero Carbon Initiatives

The Zero Carbon Oxfordshire Partnership (ZCOP) is made up of around 30 partners across the county, one of the main stakeholders being Oxford City Council. Other partners include the County Council, district councils, the Universities, the Hospitals and various commercial organisations such as BMW, Unipart, Lucy Group, Blenheim Palace etc. The partnership's aim is to collaborate to achieve a net zero county before 2050. https://zerocarbonoxfordshire.org/.

The Local Carbon Oxford Project (LCOP) was an Oxford City based externally funded trial aiming to link up organisations in Oxford City who wanted to contribute to emissions reduction or climate action related activities.

2.10 Protected Site Strategies/ Management Plans

Four of the City's large green spaces: Iffley Meadows (managed under agreement by BBOWT), Shotover Country Park, Port Meadow, and Lye Valley are designated as Sites of Special Scientific Interest (SSSI's), with Port Meadow having further statutory protection as a Special Area of Conservation.

Previously, management initiatives had been developed as part of the Wild Oxford Project (Raleigh Park, Rivermead Nature Reserve, Chilswell Valley and Lye Valley (SSSI)). Biodiversity action plans (within the Green Flag Management Plans) were originally created for Cutteslowe and Florence Parks, including a specific hedgehog protection plan form Florence Park. Management of these areas have now been combined under the Green Spaces Strategy (2013-2027), see Section 2.6.

The City Council and ODS Countryside Team are currently working with the Freshwater Habitat's Trust to utilise government grants to maintain and enhance a number of habitats across Oxford and the surrounding area.

Conservation Target Areas: Four Conservation Target Areas (CTAs) have been acknowledged within the local development plan (see Section 2.4) and the Greenspace Strategy. Previously identified within the State of Nature in Oxfordshire Report (2017), there are 39 CTAs across Oxfordshire which support one or more of 20 priority habitats within the County that could achieve the greatest gains for habitat enhancement. The four within the Council's boundary are Oxford Meadows and Farmoor CTA, Shotover CTA, Thames and Cherwell at Oxford CTA, Oxford Heights West CTA. These are identified within Policy G8 of the Local Development Plan (see Section 2.4) which supports maintaining a Green and Blue Network and connectivity/ wildlife corridors in Oxford.

Identified strategies should be integrated within a Biodiversity Strategy and Action Plan for Oxford.

2.11 Biodiversity Net Gain: Actions (February 2024 to January 2026)

Biodiversity Net Gain (BNG) has been mandatory since 12th February 2024 for major sites and 2nd April 2024 for small sites.

Oxford City Council had a requirement for major sites to achieve a minimum 5% gain in biodiversity net gain prior to further legislative requirements applying a 10% net gain in 2024.

To meet BNG obligations the council has carried out the following actions:

- Deliver internal training for case officers to provide a clear introduction to biodiversity net gain (BNG) and its role within the planning system.

- Provide technical consultation to planning services to ensure that all submitted documents meet the legislative requirements of the Town and Country Planning Act 1990 (Schedule 7A, as amended) and the Environment Act 2021, as well as relevant statutory guidance.
- Review planning conditions to ensure they are robust, fit for purpose, and capable of securing effective BNG delivery.
- Develop a standardised Section 106 template to secure biodiversity net gain both onsite and offsite.
- Assess and calculate monitoring costs on a case-by-case basis to ensure appropriate long-term resourcing.
- Work collaboratively with habitat suppliers to facilitate the delivery of biodiversity units within Oxford City, offering technical support and identifying further actions required to strengthen local delivery.
- Support the new Local Plan, which emphasises the importance of securing biodiversity net gain locally and prioritising delivery within Oxford.
- Reviewal of Biodiversity Gain Plans and associated documents to ensure that developments are able to achieve the 10% gains and satisfy Trading Rules.

In addition to the above actions that the council has carried out to meet its BNG obligations, a feasibility study has been undertaken to establish whether it is possible to use some of the council's land holdings for the purpose of BNG habitat banking within the city. At the time of writing, the feasibility study is complete and conclusions are being drawn up for recommendations to Councillors.

3.0 Consideration of Other Policies and Strategies

3.1 Introduction

Section 3 identifies those strategies and policies likely to influence the council's future actions, primarily through the development of a Biodiversity Strategy and Action Plan.

3.2 UK National Biodiversity Strategy and Action Plan (2025-2030)

Published in 2025, the UK National Biodiversity Strategy and Action Plan (NBSAP) established national actions to address biodiversity loss in the UK, Overseas Territories and Crown Dependencies up to 2030. Effectively, the UK NBSAP sets out, with targets, how the UK will achieve the Kunming Montreal Global Biodiversity Framework (GBF) targets. These link to the 13 statutory targets provided in the Environment Act (2021) which link to the Environmental Improvement Plan for England:the basis for halting biodiversity loss by 2030, together with achieving protection of 30% of land by 2030 (30by30).

A future Oxford City Council Biodiversity Strategy and Action Plan should be guided by the UK National Biodiversity Strategy, whilst setting out how the council's activities contribute to UK level biodiversity objectives and actions.

3.3 Environment Improvement Plan (2025-2043)

At national level the Environment Improvement Plan (2025) establishes the government plan in England for the restoration of nature, improvement of environmental quality linked to security, the circular economy and access to nature. The Plan sets out government goals and actions until 2043; with the plan being based upon the interim targets to reach the statutory ones framed by the Environment Act 2021. The EIP does not directly provide policy at a local authority level, but it does provide an indication of where council biodiversity policy can develop.

Goal 1 deals with restored nature. Goals 2, 3 and 4 revolve around environmental quality, with Goals 5 and 6 focusing on the Circular Economy. Environmental Security is dealt with by goals 7, 8 and 9, with access being addressed by Goal 10. Overall, the EIP establishes national activities to meet international commitments under the UN Framework Convention on Climate Change and the Convention on Biological Diversity (updated by the Kunming-Montreal Global Biodiversity Framework), together with the overall UK National Biodiversity Strategy and Action Plan (see Section 3.2).

The EIP (2025) is likely to influence local authority social and economic policy. In respect to biodiversity a concern of the EIP is that biodiversity loss could in-turn

reduce national GDP. The EIP recognises the importance of the Biodiversity Duty and the requirement on public bodies to conserve and enhance biodiversity through land management, policy making and decision taking which forms the basis of the local planning system. The EIP also identifies the related regulation - driven compliance market established by Biodiversity Net Gain (BNG) as an investment framework to increase biodiversity. BNG being integrated into Oxford's planning process and recognised in our Local Plan, with applications reviewed on the basis for ensuring measurable BNG contributions by developers are incorporated into relevant developments. **The EIP also recognises the importance of protecting statutory sites along with the appropriate management of Nature Reserves and aligned sites for biodiversity.**

The EIP identifies the need for "competitively priced and high-quality biodiversity units" to be available to enable BNG to develop and ensure 10% net gain. In doing so it emphasises the need for off-site BNG/ habitat bank opportunities. The plan also identifies the opportunity to promote biodiversity through restoration of public woodland sites, including ancient woodland and plantations. The EIP also hints at future species targets, which may evolve from the NERC (2006) Section 41 principal species of conservation importance list. **It may be possible to adopt local targets based upon Section 41 species that occur within Oxford.**

The EIP links loss of biodiversity to adverse impacts from air quality on soils and woodlands due to higher nitrogen conditions. **The link between air quality and biodiversity may enable co-ordination of biodiversity and air quality actions at a local level. The issue has been raised within planning reviews, particularly within areas adjacent to wildlife sites within Oxford.** The EIP also identifies the importance of non-peat habitats as carbon stores to alleviate impacts as part of climate mitigation. These include habitats present in Oxford such as species rich grasslands, floodplain mosaic habitats, hedgerows and scrub. **The development of non-peat carbon stores at a local level may be a basis for local carbon capture initiatives.**

A link is made by the EIP between managing heat in urban areas and biodiversity using urban greening to mitigate extreme heat**. The approach emphasises the need to co-ordinate existing tree/ woodland and future biodiversity initiatives with heat management of the city (see Section 2.7).** Similarly, biodiversity restoration can be part of flood management. **Initiatives to promote biodiversity restoration could have the added advantage of local flood alleviation**. Overall, there are opportunities to **link biodiversity restoration with climate mitigation and resilience for Oxford.**

3.4 Making Space for Nature: The Lawton Report (2010)

Although now 16 years old, it is recognised that although "*after a decade, many reports become outdated, but the main conclusions of the Lawton report have stood the test of time and been supported by recent research. Perhaps because of this, the report continues to inform government current policy.*" [i]

Making Space for Nature: the Lawton Report[ii] was an independent review of wildlife sites in England and the connections between them. The report emphasised the need for a connected and resilient ecological network in England, with a need for "*more, bigger, better and joined*" spaces for nature.

The report identified three tiers of statutory and non-statutory designations that protect and manage wildlife as part of an ecological network:

- Tier 1 - Sites whose primary purpose is nature conservation and which have a high level of protection either due to their statutory status or to their ownership: Sites of Special Scientific Interest (SSSI), Ramsar Sites, Special Areas of Conservation (SAC), and Special Protection Areas(SPA)
- Tier 2 - Sites designated for their high biodiversity value but which do not receive full statutory protection: County Wildlife Sites, Ancient Woodlands.
- Tier 3 – Areas designated for landscape, culture and/ or recreation and with wildlife conservation included in their statutory purpose: National Parks, Areas of Outstanding Natural Beauty.

In addition to these Tiers, the report also identified other important components of the ecological network such as priority habitat (now principal habitat of conservation importance) farmland and woodland, the green belt, rivers, country and municipal parks, urban green space, church yards, allotments and private gardens. These could contribute to the core tiers of the ecological network by providing:

- connections between core ecological patches
- habitats for species that range outside of wildlife sites
- buffering and reducing pressure on the network of wildlife sites

Whilst recognising urbanisation leads to biodiversity loss, Lawton emphasised the important role these sites and linear features (verges, hedges, line of trees) and stepping stone (ponds, small woods) could play, including in towns and cities like Oxford. Importantly, urban areas and transport infrastructure are recognised by the report as presenting obstacles to wildlife dispersal, whilst gardens and allotments play a role as havens for wildlife. The report indicates

that a city like Oxford, in comparison to other urban areas, is unusual in having Tier 1 sites close to urbanisation.

Given the inclusion of Core Tier wildlife sites within Oxford, use of surrounding areas for connectivity, extending species range and buffering could be the basis for further biodiversity policies and actions within Oxford.

The report also identified the vulnerability of sites from indirect pollution impacts derived from diffuse nitrogen (from burning of fossil fuels) threatening low-nutrient soil plant communities and water bodies.

Policy/ strategy development should consider if air pollution policies and initiatives can be integrated/ co-ordinated with those for biodiversity conservation within Oxford.

A key recommendation from Lawton was the establishment of Ecological Restoration Zones (ERZ) by consortia of local authorities, communities and landowners. This provided a policy basis for the development of initiatives such as Local Nature Recovery Strategies (see Section 3.8). The report recognised that the restoration and recovery of biodiversity should include urban areas for the benefit of wildlife and people.

Policy development should demonstrate co-ordination with the Local Nature Recovery Strategy for the benefit of wildlife and people.

The impact of the urban heat island effect was also recognised by the report, together with the mitigation that can be provided by urban green spaces, with substantial numbers of trees, to address climate change.

Strategies and policies should consider how habitat restoration can address climate change effects such as species/ habitat resilience, the urban heat island effect or urban barrier to range change species.

3.5 National Planning Policy Framework

UK Government's The National Planning Policy Framework (NPPF) is a periodically revised document which sets out the UK Government's planning policies for England. The NPPF effectively guides local planning authority policy development (e.g. local development plans, master plans, etc.) with the current Oxford Adopted Development Plan (Local Plan) 2036 supporting and exceeding NPPF requirements (see Section 2.4). The current NPPF dates from December 2024 and contains 16 policy sections ranging from administrative plan and decision making through to sustainable transport and high-quality communications. Biodiversity policy is set out in Section 15; conserving and enhancing the natural environment, although there are related policies in respect

to the Green Belt and ecosystem services (e.g. Section 14: Meeting the challenge of climate change, flooding and coastal change, Section 8 Promoting healthy and safe communities).

To conserve and enhance the natural environment, the NPPF requires local authority policies and decisions to protect and enhance sites of biodiversity, recognise the benefits from natural capital and ecosystem services, minimise impacts on and provide net gains for biodiversity (e.g. a policy basis to BNG), including establishing coherent ecological networks (e.g. the policy basis to LNRS) which are resilient to current and future pressures (e.g. climate change) which support priority or threatened species such as swifts, bats and hedgehogs (e.g. providing the policy basis to integrate with the requirement of the Wildlife and Countryside Act (1981), the Habitats Regulations (2017) and Sections 40 and 41 of the Natural Environment and Rural Communities (NERC) Act (2006).

Section 15 also links biodiversity conservation to landscape, soil and geological features; together with guidance on agricultural land, trees and woodland; alongside pollution control and remediating and mitigating contaminated land.

Paragraph 188 sets out how protected sites, ecological networks and green infrastructure should be considered***: Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.***

Guidance to protect habitats and biodiversity in plans (e.g. local development plans and associated strategies) are set out in Paragraph 92:

To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity[3]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[4]; and

[3] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
[4] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

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.

The significance of biodiversity (ecology) in influencing planning decisions is provided by the framework set out in Paragraph 193:

When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

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[5] and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

It should be noted that government is currently consulting (2026) on a revision of the NPPF and that local authorities may need to revise associated planning and decision making as necessary during the next 5 years. Oxford City Council has also embarked on the preparation of a new local development plan.

[5] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

3.6 Natural Environment & Rural Communities (NERC) Act (2006)

The NERC Act (2006) is a key piece of legislation in the UK that aims to protect and enhance the natural environment and rural communities. Sections 40 and 41 of the Act place a legal responsibility on public authorities to conserve and enhance biodiversity. Section 40 requires public authorities to have regard to the purpose of conserving and enhancing biodiversity, while Section 41 provides a list of habitats and species of principal importance for the conservation of biodiversity in England. These sections are crucial for ensuring that public authorities are aware of and act on the importance of biodiversity conservation in their areas (the Biodiversity Duty).

3.7 Green Infrastructure Framework Standards

The Natural England Green Infrastructure Framework Principles and Standards for England sets out best practice for planning and development; together with management of parks and greenspaces. The aim being to create healthier, sustainable and resilient communities, which bring people together with nature. The Green Infrastructure Framework provides guidance and tools to support the development of high-quality green spaces. These are based around a series of standards for infrastructure, greenspace, urban nature recovery, urban greening and trees. Use of these standards is guided by a planning and design guide, supported by tools and mapping.

The Green Infrastructure Framework provides a possible basis for developing a Biodiversity Strategy and associated Action Plan for Oxford.

3.8 Local Nature Recovery Strategy

Local Nature Recovery Strategies are regional strategies to prioritise recovery of biodiversity. Originally established by the Environment Act 2021, the strategies echo a key recommendation of the Making Space for Nature Report (2010) for ERZs (see above). The Oxfordshire (LNRS) is a partnership of district councils Oxford City Council, community groups and wildlife charities, statutory agencies, landowner and business representatives, National Landscape bodies (previously ANOBs) and academic institutions led by Oxfordshire County Council.[6]

[6] The partnership is: Berkshire, Buckinghamshire, and Oxfordshire Wildlife Trust, Cherwell District Council , Chilterns National Landscape, Community Action Groups (CAG) Oxfordshire, Cotswolds National Landscape, Country Land and Business Association (CLA), Environment Agency (EA), Forestry Commission (FC), National Farmers Union (NFU), Natural England (NE), North Wessex Downs National Landscape, Oxfordshire Local Nature Partnership (OLNP), Oxford City Council, Oxfordshire Local Enterprise Partnership (OxLEP), South Oxfordshire District Council, Thames Valley Environmental

The purpose of the LNRS is to:

- describe and map important nature recovery actions developed through local engagement.
- target actions in locations where they are most needed and where those actions could provide the best environmental outcomes as well as wider benefits.
- help to join up national efforts to reverse the decline of biodiversity.

With the structure of the LNRS built around four key elements:

Local Habitat Map: Shows locations which have the greatest potential benefit to biodiversity and the wider environment (including ecosystem services) if the habitats of these locations are created and/ or enhanced. The map advises appropriate areas for investment for nature recovery. Key areas displayed by the map are the locations for core biodiversity: the existing areas of particular importance to biodiversity; and, locations with potential to become areas of particular importance for biodiversity (i.e. potential areas for intervention).

Mapping shows that the focus of existing and potential areas for biodiversity importance centres upon and surrounding the Rivers Thames and Cherwell; together with the northwestern part of the City, centring on the SSSIs and the SACs of the area to the west of the Thames. Additionally, the eastern side of Oxford has isolated areas, with a potential corridor centred upon the area between Iffley meadows, Florence Park, Cowley Marsh Recreation Ground, Lye Valley and the Boundary Brook.

The Local Habitat Map provides a basis to develop a strategic approach via corridors and stepping stones to increase biodiversity, whilst enabling connectivity and landscape porosity to species, particularly those suffering range adjustment due to climate change

Statement of Biodiversity Priorities: Following the enabling of LNRS under the Environment Act (2021), authorities across England were asked by Government to develop Local Nature Recovery Strategies (LNRSs) for publication in 2025. The Environment Act indicated that the LNRS should include a written statement of biodiversity priorities that must include:

- a description of the strategy area and its biodiversity (which can be found as one of our key LNRS documents called the 'Description of Strategy Area')

Records Centre (TVERC), University of Oxford (departments and institutes included the Oxford Martin School, the Agile initiative, the Environmental Change Institute, and the Leverhulme Centre for Nature Recovery), Vale of the White Horse District Council, West Oxfordshire District Council, Wild Oxfordshire

- a description of the opportunities for recovering or enhancing biodiversity in the strategy area
- the priorities for recovering or enhancing biodiversity (found within this document, taking into account the contribution that this can also make to other environmental benefits)
- proposals for potential measures relating to those priorities (found within this document. The potential measures which are specific to particular species can be found on the LNRS 'Species Priorities List').

The Oxfordshire LNRS Statement of Biodiversity Priorities sets out priorities for *biodiversity that are of great importance to achieve locally and indicates which wider benefits could be achieved. The 'priorities' are the outcomes that collectively, would result in the recovery of nature across Oxfordshire. Each priority, listed below, has a set of 'potential measures' with them which are the actions that need to be taken to achieve the priority outcome.*[iii]

Priorities are included for connectivity and boundaries, grassland and scrub, heathland, mixed habitats (wood pasture, parkland, orchards, open mosaic), woodlands, rivers, streams, ponds, standing water and wetlands, deadwood, hedgerows/ hedgerow trees and invasive species. Within each priority area there are further priorities for:

- Enhancing condition of existing designated sites and irreplaceable habitats
- Improve connectivity and reduce fragmentation of habitats
- Creation of wildlife friendly boundaries
- Creation, enhancement and management of species rich habitats
- Management of road verges for wildflowers
- Improve the abundance and range species that need specific additional potential measures
- Creation of more, large, connected and functioning areas of ecosystems

The Statement also makes links to other issues associated with Ecosystem Services such as carbon storage, flood and erosion protection, recreation, etc. which are further described in Appendix A of the statement.

Priorities do include consideration of urban habitats, with Priority 38 stating: *Enhance and create more, connected, habitats and spaces for nature in Oxfordshire's villages, towns, and cities to make biodiversity and a connection with nature part of daily life (at home, at work, and in parks and gardens) and to realise the wider benefits of nature in urban areas such as urban cooling, reduce surface water run-off and cleaner air.*

Making a link to connectivity (in all senses) and ecosystem services within urban cityscapes. The priority is further developed under Priority 39: *Build more awareness of biodiversity and enable more people to join and engage with habitat enhancement, creation, and education initiatives so that more people in Oxfordshire are connected with nature and feel more able to act as stewards for Oxfordshire's current and future environment*.

Priority 40 also links to planning decision enhancements and BNG which benefit species priorities (see below) by: *Improve the abundance and range of species that need specific additional potential measures within, and around, settlements, people, and buildings*.

Species Priority List: Sets out species that need targeted help for recovery across Oxfordshire. Such assistance includes habitat management, reintroduction/ translocation and actions to reduce threats or pressures to species. The species list includes: amphibians, birds, butterflies/ moths, fish, crustaceans and molluscs, fungi and lichens, insects and spiders, mammals, reptiles, together with plants, flowers and trees. The list is based on priorities for Oxfordshire as a whole, so there is likely to be a need to identify those relevant to the Oxford City area as part of the development of an Oxford Biodiversity Strategy and Action Plan.

Description of the Strategy Area: provides a focus for urban areas within a wider Oxfordshire. The description provides an urban policy basis where urban related actions seek to increase biodiversity within villages, towns and cities through enabling local communities to make a case for nature recovery projects linked to mitigate heat and manage water and flood risk. These link to specific projects such as increasing the number of street trees, incorporation of green roofs, establishing wildlife friendly gardens and green spaces, together with wildlife enhancements such as bird boxes, swift bricks and hedgehog houses. Opportunity areas within urban landscapes are identified within the LNRS Local Habitat Map.

Consideration should be given to provision of wildlife enhancements within council activities, interventions and strategies to deliver wildlife enhancements across the city.

Actions to integrate opportunity areas (particularly wildlife corridors) across the city to link with wider Oxfordshire should be considered.

3.9 Species Conservation Strategies

Within England, Natural England operates a range of species conservation strategies. These include:

- Species Recovery Programme: Focuses on England's most threatened species with the aim of reducing extinction risk to 2022 levels by 2042. The aim being recovery of vulnerable species.
- Favourable Conservation Status Strategies: Aims to improve the status of species throughout their natural range. The strategies encompass single species, groups of habitats or a specific geographical area. The strategies can act as a guide to local authorities for relevant species.
- Threatened Species Recovery Actions: Individual species action plans that prioritise actions for species requiring targeted recovery. The plans can be used

Review and application of the Species Conservation Strategies and LNRS Species Priority List (see Section 3.8) could provide a guide to relevant species that should be included within a Biodiversity Strategy and Action Plan for Oxford.

3.10 Great Crested Newt District Licence and Biodiversity Net Gain (BNG)

NatureSpace was established in 2018 to improve the conservation status of Greta Crested Newts by providing a system of conservation within the planning and development framework. Work is based upon a District Licensing System that Oxford City Council is part of. This includes mapping of sites within the City that have sensitivity for great crested newts. **The council already takes account and participates in the District Licensing System.**

With the introduction of BNG in 2024, users of the District Licence scheme can also benefit from the integrated Biodiversity Net Gain Package managed by NatureSpace and the Newt Conservation Partnership. Based on the DEFRA approach of "stacking"[7] other environmental benefits onto BNG units, benefits from restoring/ creating great crested newt habitat can now be included in BNG proposals. More information on this can be found on the NatureSpace website.

The use of stacking or other methods of integrating species recovery within BNG proposals should be examined within the development of the proposed Biodiversity Strategy and Action Plan for Oxford, particularly in respect to the LNRS Priority Species (Section 3.8) and Species Conservation Strategies (Section 3.9).

[7] Previously applied to nutrient mitigation

4.0 Future Actions: The Oxford City Council Biodiversity Strategy & Action Plan

4.1 Introduction

Local authorities in England are required to implement the Biodiversity Duty through a series of steps to conserve and enhance biodiversity. These steps include:

- First Consideration: Public authorities must complete their first consideration of actions to conserve and enhance biodiversity by 1 January 2024.
- Agreement of Policies and Objectives: Authorities must agree policies and specific objectives based on their consideration.
- Action Delivery: Authorities must act to deliver their policies and achieve their objectives.
- Reconsideration: Authorities must reconsider their actions at least every 5 years, with the option to do so more frequently.
- Nature Recovery Strategies: Authorities are expected to prepare and publish local nature recovery strategies, which will cover the whole of England.
- Monitoring and Reporting: Authorities must monitor their environmental performance and report progress towards biodiversity objectives.

Government guidance indicates that these steps are part of the broader effort to protect and enhance biodiversity in England, aligning with national biodiversity goals and targets; with the policies, objectives and the actions Oxford City Council take dependant on the council's functions as a public authority.

For Oxford City Council, the First Consideration (Section 2.2) has been completed and indicates that biodiversity is already considered within Council functions of planning, green spaces and urban tree cover.

Biodiversity policies, objectives and actions have developed prior to the amendment of Section 40 of NERC (2006), the Biodiversity Duty. With the revision of Section 40 and the development of BNG (Section 2.12) and the LNRS (Section 3.6), Oxford City Council biodiversity policies, objectives and actions should now be updated and where necessary expanded.

4.2 Biodiversity Strategy and Action Plan

A vehicle to carry out an update of Oxford City Council biodiversity policies, objectives and actions is a Biodiversity Strategy and associated Action Plan.

Government guidance on complying with the Biodiversity Duty identifies an existing or new strategy as a means of demonstrating compliance with the Biodiversity Duty.

Based on government guidance, the Oxford City Council Biodiversity Strategy and Action Plan should be used to:

- Update internal policies, frameworks and processes to better conserve and enhance biodiversity
- Actions for managing council land to conserve and enhance biodiversity
- Actions for educating, advising and raising awareness of biodiversity

Development of the strategy will be informed by previous work (identified in Section 2), this Biodiversity Report (particularly Section 3) and an initial Regeneration, Economy & Sustainability Collaboration Day workshop (18/02/2026).

At the workshop, the biodiversity group emphasised **habitat creation, connectivity, long term stewardship, and urban greening** as core components of high value projects. It was concluded that monitoring should focus on measurable ecological enhancement and social value benefits. The group also indicated that potential funders value clarity, longevity, and demonstrable impact; conversely, projects with unclear maintenance, habitat loss risks, or poor feasibility are less attractive.

An initial structure for the Biodiversity Strategy and Action Plan can be advised by Green Infrastructure Framework Principles and Standards for England (Section 3.7), modified as required to interlink with planning policy (including revised Ecology Conditions), council greenspaces/ land ownership and existing initiatives. There is likely to also be a requirement to seek biodiversity returns through existing and new partnerships, with the strategy providing a framework to achieve this.

Government guidance on complying with the Biodiversity Duty indicates that a wider review of council policies and strategies could also include:

- transport – support sustainable travel to reduce carbon emissions and improve air quality
- waste – review waste management and recycling processes to reduce water pollution and air pollution from waste transport and landfill
- water – improve water efficiency to reduce the effect water abstraction can have on sensitive habitats and species
- procurement – buy sustainable materials and supplies to reduce the demand on natural resources
- light – make sure the design of artificial lighting minimises effects on nature

- human resources – promote and educate staff on biodiversity issues
- estate – improve the management of your land for biodiversity
- sustainability – make sure biodiversity forms a part of sustainability considerations

With guidance indicating that such reviews should be based on the Natural Capital Approach

At this stage, the policy review undertaken in this report (Sections 2 and 3), together with the workshop, identified the following topics for development by the strategy:

4.3 Avoiding Ecological Loss, Damage and Degradation

Future policy development and implementation should, through the Biodiversity Strategy and Action Plan, discourage:

a. **Habitat loss or damage** (direct or indirect) particularly of LNRS Areas of Particular Importance for Biodiversity and locations having Potential to Become Areas of Particular Importance for Biodiversity; together with statutory and non-statutory wildlife sites.
b. **Fragmentation** of existing habitats
c. **Pollution risks** that cause habitat/ ecosystem degradation
d. Introduction of **invasive species**
e. Projects that lack of space or feasibility for habitat enhancement on **small urban sites** within Oxford[8]
f. Projects that require funding but **cannot guarantee long-term management**[9]

Prevention of ecological degradation should link to sustainable development and avoid highly **prescriptive** approaches that constrain innovation. To ensure enhancements do not result in degradation, complexity or uncertainty around funding sources (statutory vs voluntary) should be avoided. A key framework for avoiding a. to f. is via the implementation of the planning and nature recovery frameworks (Sections 2.4, 3.5, 3.8) in association with BNG (Section 2.11).

[8] Oxford does not have a Habitat Bank within the city boundary. The situation creates a potential chronic issue of long term biodiversity loss in connection with the BNG Hierarchy where onsite biodiversity gain cannot be achieved leading to the use of biodiversity units or purchase of biodiversity credits outside of the city boundary.

[9] The use of Landscape and Ecological Management Plans (LEMP), Habitat Management and Monitoring Plans (HMMP) and associated Biodiversity Gain Plans, long term provisions within Biodiversity Method Statements (BMS) and similar should demonstrate long term funding to match long term maintenance of enhancement.

4.4 Promoting Biodiversity Enhancement

Future policy development and implementation should, through the Biodiversity Strategy and Action Plan, encourage:

a. Restoration/ creation of **habitats** in accordance with the LNRS (Section 3.8)
b. Establishing or improving **connectivity** through:
    - Wildlife/ green corridors along rivers, canals, roadsides, gardens, verges, hedgerows, etc.
    - Stepping-stone habitats within urban areas (ponds, allotments, green roofs, wildflower areas).
c. Enhancing the **value of existing greenspace** for biodiversity interlinked with the Green Space Strategy (Section 2.6) and greening of redundant and underused spaces.
d. Linking biodiversity enhancement to Increasing **tree cover**—street trees, woodland blocks, riverside planting by interlinking with the Oxford Urban Forest Strategy (Section 2.7).
e. Co-ordination and targeted use of BNG to meet habitat/ ecosystem restoration, creation and enhancement objectives for the LNRS (Section 3.8) and Section 41 of NERC (Section 3.6) principal species and habitats of conservation importance within an Oxford context.

4.5 Delivering Co-benefits

As part of wider ecosystem service provision within Oxford, biodiversity enhancement can contribute to initiatives such as those related to climate change resilience/ mitigation, carbon storage and increasing social value. The Biodiversity Strategy and Action Plan should link to and develop co-benefits from:

a. Reducing the **urban heat island effect** (i.e. via promotion of urban forestry and greener neighborhoods for community benefit)
b. Improved **local amenity** and wellbeing (i.e. through provision of biodiversity as part of recreation and cultural ecosystem services)
c. Securing and continuity of benefits to local communities
d. Increasing the **quality and resilience** of Oxford's greenspaces
e. Incorporating biodiversity into flood prevention and resilience projects.
f. Enhancing the **ecological character and biodiversity value** of the city (e.g., Oxford parks, cemeteries, verges, canals)
g. Aligning with and complementing **BNG requirements** (see 4.4 e.)
h. Enabling **non-statutory voluntary improvements** to biodiversity [10]

[10] Provision of guidance and funding initiatives would assist in linking areas such as gardens, amenity or redundant locations to secure provision of connectivity (corridors and stepping stones).

i. Ensuring biodiversity benefits are **equitable**, accessible, and integrated across neighbourhoods

4.6 Co-Benefits: Natural Carbon Stores

During 2026, work will be undertaken to strengthen ZCOP's links with the Local Nature Partnership (LNP) (see Section 2.9), due to synergies between carbon and nature, in both mitigating the effects of Green House Gas (GHG) emissions on the climate as well as adapting to the effects of the changing climate.

A specific project that is currently being scoped with the LNP and the County Council seeks opportunities for local organisations to plan to offset their eventual residual carbon emissions by investing in or co-developing nature-based interventions that would sequester carbon.

Linking Zero Carbon Projects to the Local Nature Recovery Partnership/ LNP would appear to also be a structure for incorporating habitat creation and enhancement, possibly through a LCOP initiative (see Section 2.9). This could possibly be linked to peat-based (e.g. fenland) and non-peat (scrub, grassland etc) carbon stores as part of the Biodiversity Strategy and Action Plan.

4.7 Biodiversity Net Gain

In the future, the Council intends to:

- Develop and maintain a dedicated database to support ongoing biodiversity gain monitoring.
- Provide further internal staff training to ensure consistent understanding and implementation of BNG requirements. Ensuring that training is delivered alongside any changes to legislation or guidance.
- Conduct site visits and review submitted monitoring reports to verify delivery and compliance.
- Support the emerging Local Plan by facilitating delivery of biodiversity units in line with the spatial hierarchy—prioritising delivery as close as possible to the impact site and, where this is not feasible, within Oxford City.
- Undertake an assessment of habitat demand and the requirements of the trading rules to help inform and support local habitat-delivery businesses, enabling the creation of a robust local habitat portfolio
- Deliver a BNG Technical Advice Note
- Review the conclusions of the BNG feasibility study into potential habitat banking on Council landholdings to assess whether, in light of current legislation, policies, environmental and market conditions, there are any updates to the actions recommended on this subject.

4.8 Evaluating and Monitoring Biodiversity

It is a statutory undertaking for local authorities and other public bodies to report on how they are meeting the requirements of the Biodiversity Duty every 5 years. For this report, Oxford City Council has commenced by providing information on BNG progress (Section 5).

In future, the Council will consider which elements of the Biodiversity Duty guidance on monitoring should be utilised by the Biodiversity Strategy and Action Plan and then reporting progress over the next 5 years. These include:

Achievements

1. actions the council has taken to conserve and enhance biodiversity
2. achievements as a result of these actions
3. actions the council plan to take in the next reporting period (see above)

How Council Policies Help Biodiversity

4. how many local sites within the Council local authority area have positive conservation management and information on its effectiveness
5. areas of land the Council own or manage that include habitats of principal importance.

How the Council Promotes Biodiversity on Land it Manages/ Owns

6. the way the Council recorded biodiversity on land it owns or manages
7. where existing conservation measures or biodiversity management plans are in place
8. where the Council put new conservation measures in place, or changed them, over the reporting period
9. that is also a local wildlife site or local nature reserve

Linking Council Managed/ Owned Land to the LNRS

10. 'areas that are of particular importance for biodiversity'
11. 'areas that could become of particular importance for biodiversity'
12. 'areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits'
13. areas where management practices have increased the importance of biodiversity

Trends

14. changes to the conservation status of habitats the Council manage or protect
15. changes to the ecological health of land the Council own or manage

16. adverse recordings of water or soil quality

17. increases or decreases in the number and type of species present

In addition, the Regeneration, Economy & Sustainability Collaboration Day workshop (18/02/2026) identified monitoring requirements/ methodologies for consideration in achieving 1 to 17 (above):

- Regular reporting on **habitat condition** and maintenance actions
- Use of recognised tools (e.g., **BNG Metric**, habitat quality assessments)
- Clear definitions of long-term maintenance responsibilities (e.g., 30-year plans)
- Evidence of **community engagement** or local participation
- Photographic monitoring or GIS based mapping of new features

The workshop then provided more detailed indicators, made links to BNG monitoring (see Section 5) and to support transparent consistent assessment (in line with 1 to 17 above):

18. **Environmental impact metrics**
    - Area of habitat created (m^2/hectares)
    - Number of **trees planted** or **hedgerows established** (subject to review and co-ordination with Oxford Urban Forest Strategy, see Section 2.7)
    - **BNG metric scores** or habitat condition improvements
    - Number and length of **wildlife corridors** or greenspace connections created

19. **Carbon implications**
    - Contribution to reducing urban heat island intensity
    - Carbon storage/ sequestration potential (grassland, scrub, trees, restored soils, wetlands)

20. **Social value**
    - Increased access to quality greenspace
    - Community involvement (volunteers, local groups)
    - Improvements in wellbeing indicators (qualitative or survey-based)

Additionally, a key element for the future reporting period will need to establish monitoring and reporting on planning related:

- BNG Indicators

- Protected species licence recommendations/ conditions
- Natural England Consultation (Statutory Sites)
- NatureSpace District License (great crested newt)
- Section 41 (NERC) Habitat- Biodiversity Duty
- Section 41 (NERC) Species- Biodiversity Duty

5.0 Biodiversity Net Gain

5.1 Summary of BNG delivery between 12/04/24 and 01/01/26

The Oxford City Council has yet to receive any monitoring reports under the mandatory BNG requirement.

The Oxford City Council has not yet allocated any land as a biodiversity gain site.

We are engaging with local biodiversity gain providers, providing advice where required, providing guidance on the process of having a S106 agreement, and will continue to develop supporting mechanisms to further encourage local delivery in line with incoming Local Plan.

5.2 The Number of Biodiversity Gain Plans Approved

The number of biodiversity gain plans approved for applications (excluding small sites) since 12/02/2024 within the biodiversity duty time frame is two. Following January 2026 further biodiversity gain plans have been approved and biodiversity gain plan submission is anticipated.

At the point of writing, the below units for the application have been secured via a biodiversity gain plan.

Please see summary table below:

	units/ %	Area Habitats	Hedgerow	Watercourse
Onsite	**Baseline**	0.73	-	0.26
	Post-development	0.93	-	0.26
	Percentage	26.72%	-	0%
Offsite	**Baseline**	0	-	0.09
	Post-development	0.04	-	0.15
	Overall	**32.16%**	**-**	**10.42%**

The area units purchased off site were located inside LPA boundary or NCA of impact site and the watercourse units were purchased outside operational catchment. The trading rules were met.

[i] Making Space for Nature – 10 years on – Natural England accessed 10/02/2026

[ii] Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra.

[iii] Statement of Biodiversity Priorities, Oxfordshire's Local Nature Recovery Strategy, Final Version, November 2025 p.3