

Statement of Common Ground between Oxford City Council and Natural England**Submission Draft (Regulation 19) Oxford Local Plan 2045****May 2026****1.0 Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Natural England for the Oxford Local Plan 2045. This SoCG reflects and confirms the current position on matters agreed by both parties with regards to issues of soundness and maintaining effective cooperation.

1.2 Oxford City Council is producing a new Local Plan covering the period 2025-2045. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Oxford Local Plan 2045. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and Maintaining Effective Cooperation.

2.1 The Local Plan 2045 has been prepared within a changing strategic national context. The legal Duty to Cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate “effective cooperation”.

2.2 Natural England are the governmental body advising on issues relating to the natural environment in England, including its protection and restoration. They are key stakeholders and statutory consultees for the Council to work with, with regards to maintaining effective cooperation on the new Oxford Local Plan 2045.

2.3 Oxford City Council and Natural England have been engaging closely together throughout the formulation of the Local Plan 2045. Natural England provided feedback at each of the key stages of the Local Plan preparation process, including the Issues Stage (2025), Preferred Options consultation (2025), and the Proposed Submission Draft Local Plan Regulation 19 consultation (2026). The relevant consultation summary reports detail summaries of this feedback. Officers have also engaged with each other at key points outside of the formal consultation cycle via virtual meetings to discuss the policy-shaping and supporting evidence, and to collaborate seeking to resolve areas of disagreement wherever possible.

2.4 The Proposed Submission Draft Local Plan Regulation 19 consultation (hereafter “*the Reg. 19 consultation*”) saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in June 2026. As per the relevant legislation/regulations, this version of the Oxford Local Plan 2045 was one that the City Council considered to be ‘sound’ for adoption, meeting the specific requirements for soundness as are outlined in the National Planning Policy Framework. In response to the Reg. 19 consultation, Natural England provided feedback on relevant strategic policies and site allocations, and key evidence base documents (i.e., the Habitat Regulations Assessment).

2.5 Following the end of the Reg. 19 consultation on 13 March 2026, Oxford City Council met Natural England to discuss their response and to try and find a way forward in relation to the issues identified within the Local Plan and supporting evidence. This meeting took place on 25 March 2026.

2.6 At the meeting on 25 March 2026, officers from Oxford City Council and Natural England discussed Natural England's comments on the strategic policies and site allocations, with a view to finding common ground. Both parties agreed that while some modifications to a selection of the site allocation policies would be appropriate, Natural England had no fundamental or significant concerns with either the plan or its supporting evidence, including the Habitat Regulations Assessment.

3.0 Strategic matters

3.1 A range of comments and suggestions were put forward by Natural England in relation to the policies of the Local Plan. The parties agreed that these were not soundness issues but rather, helpful feedback from Natural England's officers and suggestions for ways that policies could generally be improved or made clearer. Table A.1 in Appendix A sets out the specific feedback received against each policy and any proposed amendments the parties have agreed would strengthen these.

3.2 There were a few sites flagged where Natural England suggested that the impacts upon biodiversity were currently unclear. Natural England asked for additional clarification to confirm that the Council had considered how development could impact both habitat linkages and the nearby SSSIs. These included site allocation Policies SPE1 (Government Buildings and Harcourt House) and SPS14 (Redbridge Paddock).

3.3 The site allocations in close proximity to watercourses, those directly adjacent to SSSIs and ensuring that all site allocation policies appropriately cross-referenced the green infrastructure network were also topics of discussion. Conversations between Oxford City Council and Natural England revolved around the consideration of whether additional details could be added to some of the site allocation policies in relation to managing impacts on biodiversity. The Council has revisited these allocations and proposed relevant modifications to address Natural England's concerns. Table A1 provides the details of any amendments that have been proposed (see Appendix A).

3.4 Natural England set out in their response to the Reg. 19 consultation that they "agree with the conclusions presented in the HRA that there will be no Likely Significant Effects [LSE] as a result of the plan on the Oxford Meadows Special Area of Conservation (SAC) in terms of water quality or recreational disturbance". Natural England also set out that provided the City Council have "followed the advice set out within Annex A regarding the assessment of air quality, we [Natural England] can also agree with the conclusion of no LSE in relation to air quality impacts". Oxford City Council planning officers have subsequently reviewed the advice set out in Annex A and consider that the advice contained therein has been followed. Oxford City Council welcomes Natural England's agreement in relation to the conclusions of the HRA, particularly in relation to air quality impacts.

4.0 Concluding remarks/areas of agreement

4.1 Oxford City Council and Natural England have worked closely together throughout the preparation of the Oxford Local Plan 2045 preparation process and the subsequent meeting in March 2026. The discussions have been productive, and the City Council is appreciative of the comprehensive and constructive feedback that officers at Natural England have provided.

4.2 The two parties agree that the changes and responses set out in Table A.1 (Appendix A) address Natural England's concerns and/or resolve any queries raised in relation to the strategic policies and site allocations of the Local Plan. The two parties agree that there are no outstanding issues of concern in relation to the Habitat Regulations Assessment.

4.3 The parties agree to continue to work together to deliver a sound plan within the timescales available.

Signed on behalf of Natural England

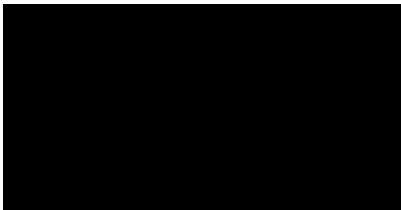


Ellen Satchwell

Title- Sustainable Development Senior Officer

Date: 19/05/2026

Signed on behalf of Oxford City Council



David Butler

Title – Director of Planning and Regulation

Date: 20/05/2026

Appendix A - Natural England Reg 19 Feedback and Oxford City Council responses

Table A.1: Natural England Reg. 19 representations and City Council Responses

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
G1	Policy G1 – Protection of Green Infrastructure NE welcomes the inclusion of a Green Infrastructure (GI) policy.... NE welcome the identification and protection of those spaces forming part of the GI core network G1A and G1B as identified on the proposals map.	Support for Policy G1 and the identification of the Core (G1A) and Supporting (G1B) spaces is welcomed.	No change proposed	n/a - general comment/ support for approach in Policy G1
G2	Policy G2 – Enhancement and provision of new green and blue features <u>Watercourse buffer</u> The plan recognises the opportunity to enhance blue corridors and NE welcome the inclusion of a commitment to restore bankside and instream habitats, leaving an undeveloped buffer zone of at least 10m width. We would encourage you to identify those site allocations where these opportunities exist and provide details of the buffer zone requirements within each of the allocation policies to ensure	<u>Watercourse buffer</u> Representation relates to certain site allocation policies only. See representations for SPCW6 – Manor Place, and SPS8 – Meadow Lane The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies.	<u>Watercourse buffer</u> No change proposed to Policy G2.	<u>Watercourse buffer</u> <i>See individual site allocation policies for details.</i> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	that these opportunities are a requirement. This would be particularly beneficial where sites are adjacent to SSSI or SAC sites and would act to enhance and strengthen the existing identified G6 ecological and G1 GI network			
G4	Policy G4 – Delivering mandatory net gains in biodiversity <u>Higher than 10% BNG target</u> NE welcome the inclusion of a commitment to deliver the mandatory 10% net gain in biodiversity. NE encourages the City Council to be more ambitious and consider a higher percentage to align with the shared regional principles of the Oxford-Cambridge Growth Corridor – i.e., 20% <u>Strategic approach</u> The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of biodiversity networks. <u>Off-site reprovision of BNG</u>	<u>Higher than 10% BNG Target</u> As set out in previous discussions, whilst we have elected to maintain a 10% Biodiversity Net Gain (BNG) target, which aligns with the legislation, Policy G4 encourages a higher delivery of BNG where possible. National guidance is clear the plan-makers should not set targets that exceed 10% unless this can be justified. Setting a policy target that exceeds the mandated 10% in Oxford is likely to be challenging due to the constrained nature of many of the site allocations. A higher target could also result in additional offsetting payments for biodiversity units being delivered through offsetting into biodiversity net gain elsewhere, outside of Oxford. Instead, we have sought a locally tailored approach to boosting gains for	<u>Higher than 10% BNG Target</u> No change proposed <u>Strategic approach</u> No change proposed <u>Offsite reprovision of BNG</u> No change proposed	<u>Higher than 10% BNG Target</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i> <u>Strategic approach</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i> <u>Offsite reprovision of BNG</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	Where re-provision of BNG cannot be delivered on site, the plan should set out where this might be delivered across the ecological network (Policy G6) across the plan area, in a similar way that is proposed within policy G1 for GI provision.	biodiversity and the wider environment which fits with Oxford's setting, as discussed further below. <u>Strategic approach</u> Chapter 4 of the Local Plan 2045 provides an over-arching approach to supporting both the Green Infrastructure (GI) and biodiversity networks, which aligns with your comments. Policies G1-G6 set out a strong hierarchy of protection for existing green features through Policy G1 and more explicit requirements for ecological sites (Policy G6). The Local Plan promotes new greening with Policy G2 seeking to secure new multi-functional green features, whilst we are also including a new policy for Oxford focussed on increasing surface greening via the Urban Greening Factor (Policy G3) - adapted from NE's own guidance. In relation to securing more space for biodiversity, the Local Plan includes specific requirements for the delivery of onsite ecological enhancements that are important for many priority species but not recognised through the BNG		

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
		process (Policy G5). This would sit alongside and enhance the provisions of the Statutory BNG requirements. <u>Offsite reprovion of BNG</u> Policy G4 already prioritises the delivery of BNG onsite and sets out a hierarchy to be followed where on-site (or adjacent) delivery is not feasible, in line with Natural England's suggestion. We have sought to ensure that the LNRS is incorporated into this hierarchy, so that applicants are guided by the opportunities it identifies where onsite delivery is not possible. The policy also recognises that there will be opportunities to deliver BNG that aligns with the delivery of measures identified in the LNRS. This will be particularly relevant where development proposals are located in areas identified within the LNRS. Separately, where site allocation policies contain land that has been identified within the LNRS, a reference is included within each policy.		
G6	Policy G6 – Protecting Oxford's biodiversity including the ecological network			

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	<u>General comment</u> ... Local ecological networks form part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. <u>Ecological enhancements</u> ...Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. <u>General comment re: sites within Oxford's ecological network</u> NE welcome the commitment to safeguard key sites within Oxford's ecological network (including Oxford Meadows SAC). <u>Adjacent to SSSI/ SAC etc.</u> NE encourage the City Council to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI and stipulate within the allocation policy that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.	<u>General comment</u> General comment noted. <u>Ecological enhancements</u> Policy G2 sets out how enhancements to the green and blue infrastructure network should be delivered, while Policy G4 sets out how BNG requirements are to be delivered prioritising on-site and then off-site delivery. Together these policies work to contribute to the enhancement of ecological networks. <u>General comment re: sites within Oxford's ecological network</u> General comment noted. <u>Sites adjacent to SSSI/ SAC etc.</u> The Local Plan 2045 does not allocate any sites immediately adjacent to the Oxford Meadows SAC. The proximity of development sites to SSSIs has been assessed in the Source Pathway Receptor Analysis. Any site allocations within Impact Risk Zones (IRZs) for the relevant SSSIs have been identified in the relevant site allocation policies. The following four policies are located immediately adjacent (or very close to) a SSSI.	<u>General comment</u> No change proposed <u>Ecological enhancements</u> No change proposed <u>General comment re: sites within Oxford's ecological network</u> No change proposed <u>Adjacent to SSSI/ SAC etc.</u> No change proposed <u>Irreplaceable habitats</u> No change proposed <u>Nature recovery network</u> No change proposed	<u>General comment</u> n/a - general comment <u>Ecological enhancements</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i> <u>General comment re: sites within Oxford's ecological network</u> n/a - general comment <u>Adjacent to SSSI/ SAC etc.</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i> <u>Irreplaceable habitats</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	<u>Irreplaceable habitats</u> We encourage the City Council to be ambitious in terms of the protection, strengthening and enhancement of the ecological network and suggest a commitment to the protection of irreplaceable habitats and priority habitats (such as lowland fen), in the policy wording. <u>Nature recovery network</u> NE encourage the City Council to consider the Oxford Nature Recovery Network and welcome the reference to the Oxfordshire Local Nature Recovery Strategy in the site allocation policies.	<i>Policy SPS14 – Redbridge Paddock</i> is separated from the Iffley Meadows SSSI by the River Thames. The policy recognises that the site lies within the identified impact risk zone for the Iffley Meadows SSSI. Policy wording has been included to ensure no adverse impacts on the SSSI. Additional policy wording has been included that relates to the incorporation of SuDS and a groundwater and surface water assessment. <i>Policy SPE1 – Churchill Hospital</i> is adjacent to the Lye Valley SSSI. The policy box for the site highlights this, and the site's location within the identified impact risk zones for the Lye Valley SSSI. Policy wording has been included to ensure no adverse impacts on the Lye Valley SSSI. Policy wording has also been included to ensure that the applicable tests identified within the relevant risk zones in the Lye Valley Study/ TAN are satisfied. Given the site's proximity to the SSSI, additional text relating to construction buffers and watercourse buffers (Policy G2) has also been included.		<u>Nature recovery network</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
		<i>Policy SPE10: - Nuffield Orthopaedic Centre</i> acknowledges the proximity of the site to the Rock Edge Geological SSSI, situated on the other side off Windmill Road. The policy includes policy text relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the Lye Valley SSSI. <i>Policy SPCW6 – Manor Place</i> identifies the proximity of the site to both Magdalen Grove Geological SSSI (adjacent) and the New Marston Meadows SSSI (within the impact risk zone). Given the proximity of the site to the Magdalen Grove Geological SSSI text has been included within the policy relating to a construction buffer. Appropriate text has also been included in the policy in relation to the site's location within the identified impact risk zone for the New Marston Meadows SSSI. No other site allocations have been proposed adjacent to SSSIs. <u>Irreplaceable habitats</u> Policy G6 includes a specific section that covers <i>internationally and</i>		

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
		<i>nationally designated sites and irreplaceable habitats.</i> This section of the policy refers to the appropriate sections of the NPPF (paras 193-195), or their equivalent paragraphs in any update of national policy. Local Plans drafted under the NPPF (Dec 2024) should be in conformity with national policy and as such the national policy position with regard to irreplaceable habitats has not been duplicated in the Oxford Local Plan 2045. <u>Nature recovery network</u> The TVERC Nature Recovery Network (NRN) has informed the development of the city's GI network (particularly the network of core (G1a) spaces. Where the Oxfordshire NRN identified a green space in the city containing a significant area of "core space" as defined by the TVERC NRN, and it was determined that space contributed to a clear green corridor function within the city, this resulted in those spaces being designated as part of the core GI network for Oxford.		
Omission policy	<u>Lye Valley SSSI: Further details</u>	<u>Lye Valley SSSI: Further details</u>	<u>Lye Valley SSSI: Further details</u>	<u>Lye Valley SSSI: Further details</u>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	NE encourages the City Council to include the details of a policy specific to the Lye Valley SSSI and the requirements for development in relation to SuDS etc., within a Local Plan policy rather than a Technical Advice Note (TAN). NE appreciates that the evidence (hydrogeological survey) that will guide planning requirements has only just been published and that the TAN is under development. However, if it is possible to incorporate this into the Local Plan that would be preferable to a TAN.	Policy G6 provides the overarching protection for all the designated sites including the Lye Valley. The supporting text explicitly references Lye Valley as one of the SSSIs with particular sensitivities and sets out the types of adverse impacts it is susceptible to. Furthermore, we have also included on the policies map the Impact risk Zones identified through the JBA Hydrogeological Report, to assist applicants. We expect that the Technical Advice Note will then provide further guidance for applicants, informed by the JBA study, in how these adverse impacts should be addressed in each of the Impact Risk Zones. Additionally, we would flag that we have also sought to include explicit encouragement for applicants within the Marston Road and Old Road Area of Focus policy to explore opportunities for design interventions on their sites that could go further than mitigating harm and secure a betterment for the Lye Valley (e.g. reducing hard surface cover). See supporting text to that policy and also criterion C of the policy.	No change proposed, however, we look forward to continuing to engage with you on finalising the Technical Advice Note ready for publication.	<i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
SPN3	SPN3 – Oxford North Remaining Phases <u>Public open space delivery: HRA mitigation</u> NE advises that the GI provide as part of the development within the SPN3 allocation is mapped and included within the Core GI Network (Policy G1) as it forms part of the mitigation for recreational impacts on the Oxford Meadows SAC and should therefore be protected from development in perpetuity.	<u>Public open space delivery: HRA mitigation</u> Some of the public open space that has been provided to mitigate recreational impacts at the Oxford Meadows SAC has already been delivered on land which falls outside of the emerging Local Plan 2045 site allocation. However, the entire site areas is included within the redline boundary of the outline planning application. As the delivery of the public open space is being administered through the implementation of that application (which is ongoing), that is why it has not been formally designated as part of the GI network. The Council will consider how best to ensure that this particular public open is maintained beyond the requirements of the planning permission.	<u>Public open space delivery: HRA mitigation:</u> No change proposed	<u>Public open space delivery: HRA mitigation</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPE1	SPE3 – Government Buildings and Harcourt House <u>General comment</u> NE welcome recognition that there may be hydrological impacts from development at this location	<u>General comment</u> General comment noted. <u>Fragmentation of linkages</u>	<u>General comment</u> No change proposed <u>Fragmentation of linkages</u>	<u>General comment</u> n/a - general comment <u>Fragmentation of linkages</u>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	on the New Marston Meadows SSSI. <u>Fragmentation of linkages</u> However, due to its proximity to the SSSI (and the presence of open mosaic priority habitat) and the site's likely high biodiversity value, NE concerned that development here will impact on the wider ecological network to which the site is linked potentially resulting in the fragmentation of linkages of linkages. NE state that "further information should be provided to evidence whether the site is deliverable"	The policy sets out that proposals should seek to retain existing features wherever possible. Additionally, under criterion c, as part of maintaining the UGF score, the policy encourages new or enhanced features which should seek to enhance connections through the site, such as wildlife corridors. We believe this helps to address NE's concerns relating to fragmentation of linkages. Criterion e flags the presence of priority habitat on site and sets out expectations of applicants where they could impact this. As with all the allocations, we have sought to consider a range of factors (e.g. biodiversity, heritage etc) in coming to the minimum capacity of the site and the requirements set out in the policy. The narrative of this assessment is captured in the site capacity assessments within the evidence base.	No further change proposed	<i>Common ground reached. This representation has been satisfactorily addressed.</i>
N/A	N/A - Headington Hill Hall and Clive Booth Student Village (SPE3 – policy reference refers to site no longer put forward in the Oxford Local Plan 2045)	This representation relates to a site that was not taken forward in the Oxford Local Plan 2045.	No change proposed	<i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPCW6	Policy SPCW6 – Manor Place <u>General comment</u>	<u>General comment</u> General comment noted.	<u>General comment</u> No change proposed	<u>General comment</u> n/a - general comment

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	NE welcomes the recognition that there may be potential hydrological impacts from development at this location on New Marston Meadows SSSI, and that any proposals coming forward will require a hydrological assessment and SuDS. <u>Priority habitat</u> There are pockets of priority habitat located within this allocation which will contribute to the ecological network, and the site as a whole will likely be of high biodiversity value give the habitats present here and its location next to the River Cherwell. <u>Watercourse buffer (Policy G2)</u> NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the River Cherwell as per Policy G2 to ensure that this is clear within the allocation policy.	<u>Priority habitat</u> Policy box for SPCW6 already notes that the site may contain S41 (Priority/Principal) habitats <u>Watercourse buffer (Policy G2)</u> We can insert some wording in the policy to align approach with other site allocation policies that are located adjacent to watercourses.	<u>Priority habitat</u> No change proposed <u>Watercourse buffer (Policy G2)</u> We suggest the following mod could be proposed: <i><u>f) A buffer should be retained along the watercourse (Policy G2).</u></i> The subsequent bullet points within the policy will also need to be updated.	<u>Priority habitat</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i> <u>Watercourse buffer (Policy G2)</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPS3	Policy SPS3 – Bertie Place Recreation Ground <u>General comment</u>	<u>General comment</u> General comment noted.	<u>General comment</u> No change proposed	<u>General comment</u> n/a - general comment

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. <u>GI Network reference</u> The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	<u>GI Network reference</u> To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the Open Space, Nature and Flood Risk heading.	<u>GI Network reference</u> Additional bullet point proposed to be added to Policy SPS3 under the Open Space, Nature and Flood Risk heading. <i><u>f) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.</u></i> The subsequent bullet points within the policy will also need to be updated to reflect this wording.	<u>GI Network Reference</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPS8	Policy SPS8: Land at Meadow Lane <u>General comment</u> NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. <u>Watercourse buffer</u>	<u>General comment</u> General comment noted. <u>Watercourse buffer</u> Policy SPS8 already includes reference to the retention of a buffer along the watercourse. We propose a modification to make it clear that that bullet point g) makes reference to Policy G2.	<u>General comment</u> No change proposed <u>Watercourse buffer</u> We propose a modification to make it clear that that bullet point g) makes reference to Policy G2, as follows:	<u>General comment</u> N/a - General comment <u>Watercourse buffer</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	NE encourages the City Council to identify the requirement for a buffer strip to be put in place of at least 10m from the watercourse to the west of the site as per Policy G2 to ensure that this is clear within the allocation policy. <u>GI Network reference</u> The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, with a likely high biodiversity value particularly in relation to the invertebrate interest present which will contribute to the strengthening and enhancement of the ecological network. Therefore, reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network.	<u>GI Network reference</u> To overcome this objection to the plan and to provide internal consistency for the policies themselves, some policy wording is suggested. This is in the form of an additional bullet point proposed to be added to Policy SPS3 under the Open Space, Nature and Flood Risk heading.	<i>g) A buffer should be retained along the watercourse (Policy G2).</i> <u>GI Network reference</u> We propose an additional bullet point to be added to Policy SPS3 under the Open Space, Nature and Flood Risk heading: <i>h) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.</i> The subsequent bullet points within the policy will need updating.	<u>GI Network reference</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPS14	Policy SPS14: Redbridge Paddock <u>General comment</u> NE welcome the recognition of potential impacts on the Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.	<u>General comment</u> General comment noted. <u>GI Network reference</u> Paragraph b) of this policy already includes a reference to supporting GI.	<u>General comment</u> No changes proposed <u>GI Network reference</u> No changes proposed <u>Fragmentation of linkages</u> No changes proposed	<u>General comment</u> n/a - general comment <u>GI Network Reference</u> <i>Common ground reached. This representation has</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	<u>GI Network reference</u> The site is identified as supporting GI (Policy G1(b)) and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network. Therefore, re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. <u>Fragmentation of linkages</u> Due to the potential high biodiversity value of this site and potential for fragmentation of linkages impacting on the SSSI, further information should be provided to evidence whether this is deliverable.	Paragraph a) of this policy already sets out that the site falls within the impact risk zone for the Iffley Meadows SSSI and includes appropriate wording to ensure no adverse impacts on the SSSI. <u>Fragmentation of linkages</u> In relation to the point about potential fragmentation impacts, the Council has reviewed this further and consider that if a proposal were to meaningfully retain a green buffer (including mature trees) and protect the river corridor/riparian corridor as the policy sets out, then the connectivity through the landscape would be preserved and this would mitigate any potential fragmentation impacts on the SSSI. The Council has reviewed the wording of the allocation in response to NE's concern and consider that the above is addressed via the current wording in bullet points d) and e) of the policy which sets out the importance of considering the SSSI and the retention of a green watercourse buffer in accordance with Policy G2.		<i>been satisfactorily addressed.</i> <u>Fragmentation of linkages</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPE1	Policy SPE1: Churchill Hospital <u>General comment</u> The above allocation falls within the Lye Valley SSSI Impact Risk	<u>General comment</u> General comment noted.	<u>General comment</u> No change proposed	<u>General comment</u> n/a - general comment

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	Zone. The Lye Valley SSSI is a lowland fen spring fed system and is highly sensitive to changes in water quantity and quality. We welcome wording within the policy which states planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon surface and groundwater flow to the Lye Valley SSSI. <u>Urban Greening Factor</u> NE encourages the City Council to be ambitious, particularly for those allocations which adjoin the Lye Valley SSSI. NE suggests, for site allocations adjoining the Lye Valley SSSI, a higher minimum target score for the Urban Greening Factor (set out in Policy G3), is considered. This is due to the increased importance in this area for natural surface coverage which in turn, ensures that the hydrological processes on which Lye Valley SSSI depends, are maintained.	<u>Urban Greening Factor</u> The UGF policy is a new approach for Oxford, and the targets we have set are informed by previous testing and what we felt would be most achievable across the city to secure a range of benefits. In relation to the Lye Valley area, The JBA Hydrogeological Study sets out the complex nature of the catchment and the different risks that apply in different areas. It is likely that bespoke, specific mitigation measures will be required to address particular surface and groundwater quantity and quality issues that may arise from development proposals. This will depend on what development is proposed and where within the locally identified IRZs for Lye Valley. Our concern, given the sensitivities of the habitats within the Lye Valley, is that setting a higher UGF target for this area could undermine the findings of the study or suggest that this is sufficient mitigation for impacts from development near by. In actuality, any measures required to mitigate the impacts on the SSSI should be	<u>Urban Greening Factor</u> No change proposed	<u>Urban Greening Factor</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
		specifically informed by the guidance in the site allocations and the Technical Advice Note (which builds on the recommendations of the JBA study) and carried out for that purpose. This may include higher levels of natural surface cover, but there may be other interventions/design choices which are also just as important (or more so), depending on what is proposed.		
SPE18	Policy SPE18: Warneford Hospital <u>GI Network reference</u> Policy SPE18 Warneford Hospital contains pockets of G1B green infrastructure as identified in the protected network and is in close proximity to the SSSI, likely contributing to the strengthening and enhancement of the ecological network, therefore reprovision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network Policy G1b should be referenced in policy	<u>GI Network reference</u> Criteria b) of Policy SPE18 already includes the following which addresses NE's objection: <i>... Losses of open space identified as supporting green infrastructure (Policy G1) will also need to be mitigated through enhancement of remaining GI. These requirements could be met in different ways, such as through enhancement of remaining areas of amenity grassland, additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings, or improvements in linkages to nearby habitat, as well as new habitat creation.</i>	<u>GI Network reference</u> No change proposed	<u>GI Network Reference</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
SPE4	Policy SPE4: Jesus College Sports Area			

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	<u>GI Network reference</u> This allocation in its entirety is part of the protected G1B green infrastructure network therefore re-provision for any loss of habitat should be delivered on site in the first instance or delivered to another part of the network. Policy G1b should be referenced in policy	<u>GI Network reference</u> Criteria a) of policy already includes the following text which addresses NE's objection: <i>The entirety of both sites has been identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss. This enhancement could be addressed in different ways, such as through qualitative improvements to remaining on-site, and adjacent, areas of open space by improving the functionality of these spaces in terms of wider benefits they provide people and species.</i>	<u>GI Network reference</u> No change proposed	<u>GI Network Reference</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>
HRA	Habitat Regulations Assessment <u>HRA</u> Natural England agree with the conclusions presented in the HRA that there will be no Likely Significant Effects as a result of the plan on the Oxford Meadows Special Area of Conservation (SAC) in terms of water quality or recreational disturbance. Provided you have followed the advice set out within Annex A regarding the assessment of air quality, we can also agree with	<u>HRA</u> The City Council is pleased that NE agree with the HRA conclusions relating to water (quality and quantity) and recreational disturbance. Having reviewed the advice set out in "Annex A", regarding air quality assessment, the City Council is confident that the assessment undertaken in relation to air quality impacts has followed this advice.	<u>HRA</u> No further work required/ no changes need to the Plan.	<u>HRA</u> <i>Common ground reached. This representation has been satisfactorily addressed.</i>

Policy/ para	Summary of Representation	Oxford City Council Response	Change proposed	Natural England's position
	the conclusion of no LSE set out in the HRA in relation to air quality impacts.			