# Oxford Local Plan 2045

## Submission Draft

# COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Laura Elphick

Organisation (if applicable): Natural England

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

**Data protection:**

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

| | Yes | No |
|---|---|---|
| **Do you wish to speak at the examination hearings?** (Please note that the Inspector will decide who to invite to speak) | ○ | ◉ |
| **Do you wish to be notified when:** | | |
| the Council submit the Oxford Local Plan 2045 to the Government? | ◉ | ○ |
| the Inspector's Report is published? | ◉ | ○ |
| the Oxford Local Plan 2045 is adopted by the Council? | ◉ | ○ |

## GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

## HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

**planningpolicy@oxford.gov.uk**

**Planning Policy Team**
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
**T: 01865 252847**
**planningpolicy@oxford.gov.uk**
**www.oxford.gov.uk/localplan2040**

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

# DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

**Please read the accompanying notes before completing Part B.** The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | |
| Policy Number | | Sustainability Appraisal | |

**Q2**. Do you consider that the document:

| | | |
|---|---|---|
| (a) is legally compliant? | ☉ Yes | ○ No |
| (b) is sound? | ☉ Yes | ○ No |
| | ☉ | ○ |

**Q3**. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

| | | | |
|---|---|---|---|
| (a) positively prepared? | ☐ | (c) effective? | ☐ |
| (b) justified? | ☐ | (d) consistent with national policy? | ☐ |

**Q4**. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

*Please use an extra sheet if completing a paper copy.*

**Q5**. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**

Date: 04 March 2026
Our ref: 540064
Your ref: Oxford City Local Plan 2045 Reg 19

planning@oxford.gov.uk

**BY EMAIL ONLY**

Customer Services
Hornbeam House
Crewe Business Park
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T 0300 060 3900

Dear Sir or Madam,

**Planning consultation:** Oxford City Local Plan 2045 –Submission Draft Regulation 19 Consultation.

Thank you for your consultation on the above dated 30 January 2025 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Local Plan 2045 Policies**

Policy G1- Protection of Green Infrastructure

We welcome the inclusion of a Green Infrastructure policy. GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Natural England welcome the identification and protection of those spaces forming part of the Green Infrastructure core network G1A and G1B as identified on the policies map.

Policy G2- Enhancement and Provision of new Green and Blue Features

The plan recognises the opportunity to enhance blue corridors and we welcome the inclusion of a commitment to restore bankside and instream habitats and leaving a undeveloped buffer zone of at least 10 metres 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 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.

Policy G4- Delivering Mandatory Net Gains in Biodiversity

Natural England welcome the inclusion of a commitment to deliver the mandatory 10% net gain in Biodiversity within local plan policy. However, we encourage you to be more ambitious and consider

the shared regional principles for protecting, restoring and enhancing the environment in the Oxford to Cambridge Arc which have been written and agreed by the Arc's local partners and stakeholders.

The principles include the aspiration to deliver biodiversity net gain for all developments of 20% which reflects the Arc's world leading environmental ambitions.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. Where reprovision of BNG cannot be delivered on site, the plan should set out where this might be delivered elsewhere in the G6 ecological network across the plan area, in a similar way to that proposed within policy G1 for green infrastructure reprovision.

Policy G6- Protecting Oxford's Biodiversity Including the Ecological Network

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Natural England welcome the commitment to safeguard key sites within Oxford's ecological network which include Oxford Meadows SAC and the numerous SSSI across the city. We encourage you to identify those site allocations which are proposed on land immediately adjacent to the SAC and SSSI's and stipulate within the allocation policy that appropriate buffering and delivery of habitat supporting the interest features of the designated site will be required.

We encourage you to be ambitious in terms of the protection, enhancement and strengthening of the ecological network and suggest that you include a commitment to the protection of irreplaceable habitats and priority habitats such as lowland fen, within the policy wording.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here Habitats and species of principal importance in England - GOV.UK (www.gov.uk): BAP identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here Protected species and development: advice for local planning authorities - GOV.UK (www.gov.uk). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Natural England encourage you to consider the Oxfordshire Nature Recovery Network and we welcome reference to the Oxfordshire Local Nature Recovery Strategy with policy allocations.

**Lye Valley Site of Special Scientific Interest**

We encourage your authority to include details of a policy specific to the Lye Valley SSSI and the requirements for development in relation to Sustainable Urban Drainage features etc within Local Plan policy rather than a Technical Advisory Note. We appreciate that the hydrogeological survey work which will guide planning requirements has only recently been published and that the TAN is under development, however if it is possible to incorporate this into the Local Plan then that would be preferable to a TAN.

**Chapter 8- Infrastructure and New Development**

Policy SPN1- Northern Gateway

We advise that the green infrastructure provided as part of development within the SPN1 allocation be mapped and included within policy G1 green infrastructure core network as it forms part of the mitigation for recreational impacts on the Oxford Meadows SAC and should therefore be protected from development in perpetuity.

Policy SPE1- Government Buildings and Harcourt House

Natural England welcome 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. However, due to its proximity to the SSSI and the presence of open mosaic priority habitat at the site and the site's likely high biodiversity value, we are concerned that development here will impact on the wider ecological network to which the SSSI is linked, potentially resulting in the fragmentation of linkages. Further information should be provided to evidence whether this site is deliverable.

Policy SPE3- Headington Hill Hall and Government Buildings

As with policy SPE1, we welcome 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. There are pockets of land within this allocation that are deciduous woodland priority habitat and are allocated as part of the G1 core network, therefore protection should be afforded to those areas that are present on the site. Reprovision should be delivered onsite in the first instance or to another part of the network.

Policy SPCW6- Manor Place

As with the above policies, we welcome 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. 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 given the habitats present here and its location next to the River Cherwell.

We would encourage you 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.

Policy SPS3- Bertie Place Recreation Ground

Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.

This site is identified as a supporting G1B asset of the protected green infrastructure 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 SPS8- Land at Meadow Lane

Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI. We encourage you 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 blue infrastructure is maintained and strengthened.

This site is identified as a supporting G1B asset of the protected green infrastructure network 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.

Policy SPS14- Redbridge Paddock

As above, Natural England welcome the recognition of potential impacts on Iffley Meadows SSSI and the requirement for hydrological assessment and SuDS features due to this site's proximity to the SSSI.

This site is identified as a supporting G1B asset of the protected green infrastructure network and is in close proximity to the SSSI, 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. 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 site is deliverable.

Policy SPE1- Churchill Hospital

The above allocation falls within the Lye Valley SSSI impact risk 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 allocation policies which states that 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.

We encourage you to be ambitious, particularly in relation to those allocations which adjoin the Lye Valley SSSI. We suggest that for these site allocations you consider requiring a higher minimum target score for the Urban Greening Factor than that set out in policy G3. This is due to the increased importance in this area for natural surface cover which in turn ensures that the hydrological processes on which the Lye Valley SSSI depends are maintained.

SPE 18- 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 SPE 4- Jesus Sports Area

This allocation in its entirety is part of the protected G1B green infrastructure 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.

**Habitats Regulation Assessment**

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 the conclusion of no LSE set out in the HRA in relation to air quality impacts.

If you have any queries relating to the advice in this letter please contact me on [redacted]

Yours sincerely

Laura Elphick
Sustainable Development Lead Adviser
Thames Solent Team

**Annex A: Natural England Standard Advice for Air Quality Impacts for Local Plans**

Local Plans are likely to generate increased emissions of nitrogen oxides (NOx) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. As impacts from individual development management proposals would be difficult to quantify without an overarching assessment of the cumulative impacts from Local Plan development, it is necessary for this to be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the Natural England research report '*The ecological effects of air pollution from road transport: an updated review*' (NECR199).

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites.

Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used. Habitats Sites and SSSIs at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition and/or acidification.

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should also be taken as Natural England's formal representation under the Town & Country Planning (Local Planning) Regulations 2012. This standard advice is applicable to all stages of the Local Plan process. This includes advice on information that is required to assess air quality and how to interpret the results of air quality modelling for your LPA to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. Detailed guidance on how to undertake a Habitats Regulations Assessment for air pollution impacts generated from traffic can be found here Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

**Air pollutants**

This advice covers the following air pollutants:

- ammonia (NH3)
- nitrogen oxides (NO, NO2 or NOx)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO2)

Standing advice on air pollution and development is also available here: https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities
Whilst the standing advice does not cover Local Plans, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken by local planning authorities.

**Table 1: Sequential approach to air quality assessments**

| Stage | Step | | Supplemental evidence/ basis for judgment |
|---|---|---|---|
| **Initial screening for credible risk of an effect** | **1** | Check Distance criteria - could significant emissions reach a protected site?<br>Yes = move to Step 2<br>No = no further HRA required | The Air Pollution Information System (APIS) includes an introduction to air pollution.<br><br>APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features.<br><br>For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered.<br><br>Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.<br> |
| | **2** | Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts.<br>Yes = move to Step 3<br>No = no further HRA required<br><br><br>APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srcl<br><br>Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.<br> | The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites.<br>The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).<br><br>If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.<br> |
| **Detailed AQ modelling** | **3** | Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) - Roads<br><br><br>Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.<br> | Air Quality modelling for Local Plans should include relevant scenarios that are clearly identified. We advise an allowance is also made for windfall development.<br><br>One such example of scenarios is a baseline plus future forecasts as follows:<br>Baseline, future baseline (at end of plan period taking into account background trends for each pollutant), do nothing (without plan), do something (with plan).<br><br>The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf |

| | | | |
|---|---|---|---|
| • **Applying screening thresholds** | • **4a** | • Apply Screening Threshold Alone<br>• If below threshold alone, move to step 4b.<br>• If above = move straight to step 5 | • Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the annual averages.<br>•<br>• If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect alone irrespective of the background levels. |
| | • **4b** | • Apply Screening Threshold In-combination.<br>• If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required.<br>• If above = move straight to step 5<br>•<br>• | • Use information from competent authorities (Planning Portal or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination for emission from roads/ increase in traffic.<br>• For example, add emissions & deposition from other Local Plans together and apply 1% to that sum. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect in-combination irrespective of background levels. |
| • **Detailed Assessment of ecological impacts** | • **5** | • This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures.<br>•<br>• If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this.<br>•<br>• For SSSIs, this step should provide all the information necessary, including any required mitigation, for the LPA to determine if there would be an adverse effect on a SSSI. Should an adverse effect not be ruled out, this will need consideration within the Local Plan Sustainability Appraisal and consideration of the tests of the NPPF (para 193b).<br>•<br>• If Habitats Sites are impacted by the proposals, move to Step 6. | • The following information is likely to be helpful for the LPA:<br>•<br>• Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there?<br>•<br>• Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not.<br>•<br>• Assess likely scale and duration of impacts on habitats from emissions.<br>•<br>• Check whether any strategic initiatives in the area (such as shared nitrogen action plans) would be compromised by the proposals.<br>• |
| • **Appropriate Assessment (AA) for habitats sites**<br>•<br>• | • **6** | • LPA to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed by the applicant should also be assessed at this point.<br>•<br>• Should the AA conclude that the Local Plan would have an AEOI that cannot be excluded with mitigation measures, consider derogation route of the HRA process. | • Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the plan. To be viable, such measures should be **effective, reliable, timely, guaranteed** and of **sufficient duration**. The assessment of such measures should be supported by evidence.<br>•<br>• When deciding on whether the proposals set out in the plan will have an adverse effect on |

| | | | |
|---|---|---|---|
| | | • <br>• Should compensation measures be required under derogation, please contact Natural England for specific advice. <br>• <br>• Note: If an AA has been undertaken of the proposals alone and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects | Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective. <br>• |

**Additional advice**

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. the main source of background exceedance is due to agriculture, but the proposal is a road scheme). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

Where an air quality report concludes that only a very small area of the site will be impacted, the assessment of effects on integrity or damage to the site, should take into account the interest features of the site, their distribution and how they will be impacted by proposals rather than on specific percentages of site. Dependent on features being present in the area to be impacted, this could have a disproportionate impact on the site if an area of a rare habitat type were lost rather than a judgement just on the percentages of habitat.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and Nitrogen Oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a "restore" objective, this should be noted as a "retardation" of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Common Standards Monitoring[1] is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

**Defra Emissions Factor Toolkit**

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that Local Plans should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment.

We therefore advise that emission factors no later than 2030 are used for HRAs– which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create 'ammonia slip' over time. Ammonia slip is the unreacted ammonia ($NH_3$) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases.

**Motorways within the affected road network**

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the local plan.

**How to Use this Advice in Decision Making**

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with the conclusions of your HRA in relation to air quality impacts and that the Local Plan is sound in this regard.

**Local plan policy Advice:**

Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on protected sites. If the Local Plan would result in other air quality impacts apart from traffic, then this will also need to be addressed.

Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. The local plan policy could include the following:

1. *Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).*
2. *Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.*
3. *To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider:*
    - *the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites and SSSIs during the design process of the development; and*
    - *how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure.*

A local plan could go on to set out what would be required for different development types in more detail. This may be important where there is strong evidence that particular sources of air pollution are preventing nature recovery. For example, where agricultural development is known to be one of the main sources of air pollution, a policy could specify a buffer around a protected site within which new

or intensified agricultural proposals would not be permitted, apart from in exceptional circumstances.[2]

[1] Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation [2] Joint Nature Conservation Committee's (JNCC) Nitrogen Futures Project, available at: https://jncc.gov.uk/our-work/nitrogen-futures/