



The Local Plan 2045 will be used to ensure
Oxford is a fairer, greener and healthier city

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 1: Legal Compliance

Issue 1 – Legal Challenge

Q1 What is the latest position regarding the legal challenge and associated injunction which prevented submission of the Local Plan for examination?

A legal challenge was made on 7th April 2026 by Friends of the Fields, Iffley. The claimant sought to challenge, by judicial review, the decision of Council on 26th January 2026 to submit the Plan for public examination. Following the claim, the High Court issued an interim injunction on 22nd May 2026 preventing the submission of the Oxford Local Plan 2045 to the Secretary of State.

The Claim made was that the resolution to submit the plan was in breach of the requirements at Regulation 8(2) Environmental Assessment of Plans and Programmes Regulations 2004 . It was claimed that the decision to submit the plan was made before taking account of the opinions expressed in response to the invitation referred to in Regulation 13(2)(d) of those regulations. The Claimant considered the Regulation 18 consultation report amounted to a consultation for the purposes of Regulation 8(3) and that it was not available to the public prior to the commencement of the Regulation 19 consultation or to the meeting of Full Council on 26th January 2026, and that even if it was, that members had not been told to read the consultation responses and it was not listed as a background paper.

The City Council felt it had solid grounds to defend the claim. However, given the apparent time it would take to defend the matter at court, instead a consent order was agreed with the claimant, signed and approved by the High Court on 25th June 2026. The consent order said the injunction preventing submission would be discharged with a new decision to submit being taken by full Council, if one condition was met. The condition was as follows:

Condition (1) is that the resolution of the Defendant's Full Council to authorise submission of the Oxford Local Plan 2045 to the Secretary of State for examination is made on the basis of the Full Council having considered

(a) the Regulation 18 Consultation Statement published in January 2026; and

(b) the Regulation 19 Consultation Statement to be published no later than 7 July 2026.

Insofar as the relevant officer's report to the Defendant's Full Council either includes and appends documents (a) and (b) above, or lists them as background documents (whether using the specific terminology at (a) and (b) above, or materially similar terminology), and provided that Members are told to take that material into account, it is to be conclusively presumed that the Defendant's Full Council did consider those documents when making the relevant resolutions.

A report was taken to full Council on 13th July 2026 requesting authorisation to submit the Oxford Local Plan 2045 to the Secretary of State for examination. This report (published by the 7th July deadline) appended the Regulation 18 and Regulation 19 consultation reports and expressly directed members to consider them in making their decision. The City Council made the decision to submit the Oxford Local Plan 2045 on 13th July 2026 in accordance with the condition, thereby discharging the interim injunction. The Plan was submitted the day after.

Q2 How, when and by what means did the Council decide whether or not to submit the Local Plan for examination, and as part of this process, how were opinions expressed through representations taken into account?

The decision to submit the plan for examination was taken at a meeting of Council on 13th July 2026. The report to Council is in the examination library as [CSD.010](#). This was a return to Council following the earlier decision at full Council on 26th January 2026 to approve the pre submission plan for publication and subsequent submission.

The first recommendation of the report [CSD.010](#) was that Council 'authorise submission of the Oxford Local Plan 2045 to the Secretary of State for examination, including the minor amendments made according to recommendation 3'. There were three other recommendations, including 2, that Council 'Approve all the supporting statutory documentation including the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP), Policies Map, Regulation 18 Consultation Statement, Regulation 19 Consultation Statement and Equalities Impact Assessment (Appendices 2-7 & 9).' The recommendations were approved at the Council meeting.

Nine appendices were attached to the report, including the Regulation 18 Consultation Statement and the Regulation 19 Consultation Statement. Council was clearly directed to consider these. Paragraph 2 of the committee report ([CSD.010](#)) says: 'A Regulation 19 Consultation Statement summarises the responses that were received during this period (Appendix 7, to be taken into account)'. Paragraph 12 says: 'A summary of the Regulation 18 consultation responses and how they informed the draft submission plan is appended for consideration (Appendix 6: Regulation 18 Consultation Statement)'.

Paragraph 12 of the committee report sets out the stages of engagement that took place and broadly explains how these have informed the plan: 'Engagement has already provided an important input in forming and shaping the Proposed Submission Local Plan. Engagement and consultation on the Oxford Local Plan 2045 has been consistent with the Statement of Community Involvement in Planning and appropriate to the stage. Public engagement has involved: the early engagement survey 17th March-28th April 2025, the Regulation 18 preferred options consultation that took place from 28th June- 8th August 2025, following Cabinet approval on 18th June 2025, and the Regulation 19 proposed submission draft consultation took place from 30th January-13th March 2026, following full Council approval on 26th January 2026. Alongside the evidence base and Government policy, engagement at the early non-statutory stage and at Regulation 18 has been important in informing policy direction, together with professional judgement. A summary of the Regulation 18 consultation responses and how they informed the draft submission plan is appended for consideration (Appendix 6: Regulation 18 Consultation Statement).'

Paragraph 13 of the committee report makes specific reference to the different nature of the Regulation 19 publication: 'The Regulation 19 publication is not a consultation in the standard sense. Instead, the aim of the recent Regulation 19 (Proposed Submission Draft) consultation stage is to ask for views on whether the Plan meets the tests of soundness set out in paragraph 36 of the NPPF, with the aim of allowing interested parties the opportunity to make

representations on the draft plan and subsequently participate in the independent examination. Comments received at this stage are sent to the Secretary of State on submission of the Plan for consideration by the Inspector as part of the examination.' Paragraphs 16-18 set out in more detail the process for modifications and the limited scope to make changes following Regulation 19 publication and before submission. In paragraph 17 it is made clear that if, considering the representations made at that stage, a significant change is required for soundness, then a further period of consultation on both the amendment to the plan and any necessary change to the sustainability appraisal would be required. Therefore, in making a decision to submit following Regulation 19, the concern regarding representations is whether any of them raise a point of soundness considered valid and which gets to the heart of the plan, in which case the action is to amend and re-run a Regulation 19 publication.

The Consultation Statement [CSD.003](#) includes [Appendix 4 Preferred Options Consultation Report](#). The report includes headlines of comments received at Regulation 18 for each chapter, graphs showing the questionnaire responses, and then a detailed summary of comments received in relation to each policy, divided into issues, and with an officer response. The officer response noted changes to the plan that responded to the comments. This enabled members, on making their decision to submit, to see what responses had been made at this stage and how they had informed the plan.

The Regulation 19 publication responses are summarised in [Appendix 3](#) of CSD.003. This shows who representations were received from in relation to each policy, summarises these and gives an officer response. This enabled councillors to see the magnitude of comments, see that officers did not consider there to be issues that got to the heart of the soundness of the Plan and that would need a repeat of a stage before submission, and to draw their own conclusions about that.

Q3 Following submission of the Plan, are there any outstanding matters that would prevent its examination?

The interim injunction applied only to submission, and not to examination. The injunction preventing submission of the plan has been fully lifted. There are no matters preventing examination of the Plan.

Issue 2 – Public Consultation

Q1 Has public consultation been conducted in accordance with the Council's Statement of Community Involvement, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?

Yes, consultation has been carried out in accordance with the SCI, the NPPF, the [PPG](#) and the requirements of the 2004 Act and the 2012 Regulations, as set out further below.

Overview

National Planning Policy Framework (NPPF) 2024

Section 3, 16c of the NPPF states that during plan-making, plans should "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees" and "be accessible through the use of digital tools to assist public involvement and policy presentation".

Planning and Compulsory Purchase Act 2004

The Act establishes the statutory framework for preparing Local Plans. It requires local planning authorities to prepare and maintain a Statement of Community Involvement (SCI), which sets out how local communities and stakeholders will be involved in the preparation and revision of Local Plans and in planning applications.

A Local Plan must be prepared in accordance with the authority's SCI. Consequently, authorities are legally required not only to undertake consultation but also to do so in a manner consistent with the consultation commitments they have made in their SCI.

Town and Country Planning (Local Planning (England) Regulations 2012)

The 2012 Regulations provide the detailed procedural requirements for Local Plan consultation.

Regulation 18 requires local planning authorities to:

- Notify relevant consultation bodies about the subject of a proposed Local Plan.
- Invite representations on what the Local Plan ought to contain.
- Consult specific consultation bodies, general consultation bodies and other residents, businesses or organisations considered appropriate.
- Take account of any representations received when preparing the Local Plan.

The Regulations also require consultation on the publication version of the Local Plan (Regulation 19), giving interested parties an opportunity to make representations on the plan's legal compliance and soundness before it is submitted for examination.

Planning Practice Guidance (PPG)

The PPG emphasises that community engagement should be an integral part of plan-making and should begin as early as possible. Local planning authorities are encouraged to engage proactively with residents, businesses, community groups, landowners and other stakeholders to ensure plans are based on a wide range of views and local knowledge. Engagement should be accessible, proportionate and tailored to local circumstances, with authorities clearly explaining how consultation responses have influenced the development of the plan.

The PPG also highlights the importance of using a variety of consultation methods and ensuring that participation opportunities are available to all sections of the community. Authorities should publish consultation findings and explain how representations have been taken into account in preparing the Local Plan.

Statement of Community Involvement (SCI)

The Statement of Community Involvement (SCI), published in 2021, sets out the City Council's approach to involving the community and stakeholders when preparing planning policy documents. The approach it sets out follows the requirements and guidance in the Act, NPPF, Regulations and PPG. Paragraph 4.4 of the latest SCI ([DPL.008 - Statement of Community Involvement](#)) highlights that different levels of involvement "may be appropriate in different circumstances". One of the levels identified is information-sharing. The Council has provided this including by ensuring that the Local Development Scheme (LDS) is updated where appropriate and the latest version can be viewed here, [DPL.009 - LDS](#). The other two levels of involvement identified are participation and consultation, both of which have been used in the Local Plan consultation process. Paragraph 2.4 of the SCI explains a set of principles which seek to ensure that people will have the earliest opportunity to bring forward their ideas and to help shape proposals and what level of involvement would be expected.

Oxford City Council's Consultations

Informal Early Engagement Consultation

An Informal Early Engagement Consultation was available for a six-week period, from 17 March 2025 to 28 April 2025. This first consultation was not statutory, but at the earliest opportunity, the Council wanted to involve as many people as possible in the process of producing a new Local Plan. This additional stage reflects the expectations of paragraph 2.6 of the SCI ([DPL.008](#)) which states that "consultations should start as early as possible to give everyone the opportunity to participate and influence the development of policies and options for an area", and with the PPG that says community engagement should begin as early as possible.

This consultation was designed to preview certain topics that are prevalent in Oxford and that can be addressed within a Local Plan. There were seven main topics screened into the survey to gain a sense of how important these are to the respondents and what should be a main focus for the preferred options consultation stage of the Local Plan. This consultation invited representation from residents, businesses, community groups and any interested party and was distributed via the Oxford City Council website, social media, press releases, the Oxford City Council newsletter, email lists, and posters in libraries and community centres. The full

report can be found here, [CSD.003 - Appendix 6 - Early Engagement Report](#).

Preferred Options (Regulation 18) Consultation

Who was consulted?

The Preferred Options consultation was available for a six-week period, from 27 June 2025 – 8 August 2025, using the First Draft Oxford Local Plan 2042 as the main document ([CSD.003 Appendix 5](#)). This stage sought views on the draft policies identified as preferred options - those considered most likely to deliver the best outcomes compared with alternatives outlined in the Background Papers (and cross-referenced).

This consultation aimed to involve residents, workers, employers, students and visitors to Oxford as well as stakeholders and service providers. The consultation aimed to involve the whole city by delivering a questionnaire door-to-door across the city (approximately 46,000 properties). Letters were sent to various organisations and individuals, which included the statutory stakeholders and a wide range of interest groups, developers and agents. Direct contact was made with the following by email or letter:

- All residential addresses in the post code sectors covering Oxford (door-to-door delivery of questionnaires to approximately 46,000 households)
- Statutory consultees and Duty-to-Cooperate bodies (full list of consultees can be found in Appendix 1 of the full report)
- Additional local groups and organisations who were likely to be interested (full list of consultees can be found in Appendix 2 of the full report)
- Respondents from the Early Engagement Consultation who wished to be kept informed of further stages in the Local Plan process (180 persons)
- All contacts on the Planning Policy Database/Contact List, made up of persons and organisations signed up for updates on the Local Plan and related matters (400+ contacts)

This means that the requirements of Regulation 18 to notify and invite to make representations the relevant specific and general consultation bodies and such residents or other persons carrying out business in the LPA's area that the LPA considers it appropriate to invite representations were fully applied.

Consultation Material, Promotion and Publicity

At this stage in the Local Plan, the consultation material published was focussed on presenting the preferred policy options, and providing the evidence base that led to the development of the policy options and to the preferences for those options. The consultation focussed on asking consultees whether they agreed with the Council's preferences for the policy options.

In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind:

- For people with 5-10 minutes to get involved:

- o Leaflet (equivalent 2 sides A4) with a freepost reply with basic information, a simple ‘Strongly Agree – Strongly Disagree’ questionnaire and some space for additional written comments
- o Online questionnaire based on the 5 main topics contained in the leaflet survey
- For stakeholders and those with more interest/time:
 - o First Draft Oxford Local Plan 2042 Consultation Document
 - o Draft Sustainability Appraisal
 - o Background Papers
 - o Structured online questionnaire (on the Council’s Consultation Portal) to comments on Preferred Options Consultation Document (in addition to the option of submitting written feedback on the council website, by email or by post)

These methods align with the SCI ([DPL.008 - Statement of Community Involvement](#)), as set out in paragraph 4.3 and 4.8. Also, in line with paragraph 7.2 of the SCI, the materials described above were available:

- On the Council’s website
- In 7 local libraries and the central library
- As hard copies on request

The consultation was promoted and publicised by a broad range of methods, selected from the range set out in Table 1 and Table 2 of the SCI. This included notifying those on the City Council’s online consultation database (all those interested in planning or other relevant topics – 400+); notifying statutory consultees and Duty to Cooperate bodies; notifying residents groups and amenity groups; notifying all primary and secondary schools within the Oxford City administrative boundary (and surrounding areas including Botley, Kennington and Kidlington); publishing information on our webpage and dedicated consultation webpage; utilising the City Council’s social media channels; a press release; a briefing to Local members; and all libraries having hard copies of the Evidence Base, draft Sustainability Appraisal, and Background Papers.

Additional to this, there were a number of face-to-face sessions – including in-person ‘drop in’ sessions at various locations across the city, attended by officers of the Planning Policy team, and a number of online sessions that were subject and topic based for which there was a sign up/booking process for members of the public. These were widely advertised through all social media channels, all libraries, and on our website. The events were scheduled as follows:

Date & Time	Location
Saturday 5 th July 2025, 12:00-15:00	The Leys Festival
Saturday 5 th July 2025, 14:30-16:30	Afternoon tea at Littlemore Village Hall
Monday 7 th July 2025, 16.30-18.00	ONLINE
Tuesday 8 th July 2025, 10:00-14:00	Barton Community Centre

Wednesday 16 th July 2025, 11:00-13:00	North Oxford Association
Thursday 17 th July 2025, 11-12.30	ONLINE
Sunday 20 th July 2025, 9:15-12:00	South Oxford Farmers Market
Wednesday 23 rd July 2025, 10:45-14:15	Town Hall, Long Room
Saturday 26 th July 2025, 10:00-14:00	Wolvercote Mill Community Café
Tuesday 19 th July 2025, 17.00-18.30	ONLINE

Responses to Consultation

The postal leaflets and online questionnaire were both based on the same set of questions, and so both sets of responses were collated and analysed together. Additionally, any emailed or written responses were summarised, collated and analysed with the questionnaire responses. A total of 1,382 combined responses were received over the consultation period. To view all responses and officer responses, please see [CSD.003 - Appendix 4 - Preferred Options Consultation Report](#). The report shows how comments have been taken into account in the stage of plan-making. This meets the requirements of Regulation 18 of the Town and Country Planning (England) Regulations 2012 to 'take into account representations made to them in response to invitations under paragraph (1)'.

Proposed Submission (Regulation 19) Consultation

The Proposed Submission (Regulation 19) consultation ran for 6 weeks from 30th January 2026 – 13th March 2026, consistent with the requirements of the Town and County Planning Regulations 2012 and the City Council's usual consultation period identified in the City Council's SCI.

The Proposed Submission consultation is required to focus on the Plan's legal compliance and soundness. The Council directly notified all individuals and organisations registered on the City Council's database, including participants from earlier consultations, statutory consultees, Duty to Cooperate bodies, residents' associations and other interested groups. While representations were invited from all parties, the consultation was targeted towards those best placed to comment on the legal and soundness tests required at this stage. Please see [Appendix 1 - Statutory Consultees](#) for a list of the statutory consultees and [Appendix 2 - Additional Local Groups and Organisations Contacted Directly](#) for the additional local groups and organisations.

The consultation period was publicised through the following channels:

- Publication of the current Local Development Scheme ([DPL.009](#) – Local Development Scheme 2026–2031, which superseded the 2025–2030 LDS in December 2025)
- Direct notification of residents and stakeholders as described above
- Publishing information on the City Council webpage, and dedicated page on the consultation portal

- The City Council's social media channels
- A press release
- Briefings to local councillors

The City Council received comments from 162 respondents. The responses received are summarised in [Appendix 3 of CSD.003](#). This provides an extensive summary of the comments received, as well as an officer response to the comments. Minor modifications to the Plan have been proposed in response to some of the comments. Where comments raised concerns that the City Council considered could be resolved with an acceptable modification to the Plan, any main modification would need to be recommended by the Inspector and would require consideration in the Sustainability Appraisal process and further consultation. The full report can be viewed here: [CSD.003- Appendix 3- Submission Draft Consultation Responses and Officer Responses](#).

Conclusion

Public consultation on the Oxford Local Plan has been undertaken in accordance with the Council's Statement of Community Involvement (SCI), the NPPF, Planning Practice Guidance, the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council exceeded the minimum statutory requirements by undertaking a non-statutory Early Engagement consultation prior to the formal Regulation 18 stage, consistent with the SCI commitment that consultation should commence as early as possible to enable stakeholders to influence the development of policies and options. This consultation was open to residents, businesses, community groups and other interested parties and was promoted through a wide range of communication channels.

The Preferred Options consultation fulfilled the requirements of Regulation 18 by inviting representations from statutory consultees, Duty to Cooperate bodies, residents, businesses, community organisations and other interested parties on the content of the emerging Local Plan. Consultation material was made available through a variety of formats and locations, including online, libraries and hard copies on request, and was supported by extensive publicity, direct notifications and a programme of in-person and online engagement events across the city. The Council also undertook targeted engagement with approximately 46,000 households and maintained comprehensive stakeholder notification lists.

The Proposed Submission consultation fulfilled the requirements of Regulation 19, providing a six-week consultation period consistent with the SCI. Consultation focussed on legal compliance and soundness and directly notified statutory consultees, interested parties and previous respondents. The Council has documented consultation responses, published consultation reports and demonstrated how representations have informed the evolution of the Plan, including the identification of proposed modifications where appropriate.

Collectively, these measures demonstrate a comprehensive, proportionate and inclusive programme of engagement that accords with the SCI, national policy and guidance, and the statutory requirements for Local Plan preparation.

Issue 3 – Sustainability Appraisal ('SA')

Q1 Paragraph 5.15 of the SA describes 2 options considered by the Council in developing the Plan: prioritising housing and prioritising employment. The housing option seeks to only protect and intensify 'key employment sites'. However, by protecting employment sites in this way, has the Council considered reasonable alternatives to a sufficient degree, including those which could deliver a greater number of new homes in Oxford?

In a space-constrained city such as Oxford, officers are acutely aware of the competing pressures on land that arise from housing and employment. Various types of constraints on land in the city (i.e. tightly drawn administrative boundaries, areas of floodplain, heritage sensitivities and ecological designations) mean that options for how growth can be accommodated are limited.

Including the above physical context, there were a couple of other key factors in determining what was and was not a reasonable alternative for the growth strategy. One was national policy, which sets out that the Local Plan needs to plan positively for growth, meeting identified needs such as for housing and economic growth. The other was the Local Plan's objectives which address a range of issues including improving access to healthy, affordable housing, as well as supporting key employment sectors in the city and helping residents to access local jobs and training.

In light of the government's standard method identifying a clear housing need, and the Employment Land Needs Assessment (ELNA) ([ECON.001](#)) identifying employment floorspace needs over the plan period, the growth strategy alternatives therefore needed to grapple with planning for both the identified need for housing and the identified need for employment floorspace. Considering a growth strategy which solely focussed on one land use without responding to the other was not considered to be a 'reasonable alternative', the question was instead about the right balance to strike.

The growth strategy testing as presented in Section 5.1 of the Sustainability Appraisal ([CSD.004a](#)) has considered varying levels of focus on employment land. Some alternatives explored prioritising employment (Options 1b, 2b and 3b) and would have involved various policy choices including the protection of a network of local, regional and national sites, intensification and expansion of existing employment sites and delivering new employment sites. Some alternatives explored prioritising housing (1a, 2a and 3a) whilst scaling back the policy approach to employment, and these would focus on meeting employment needs primarily through protecting and intensifying only key existing employment sites, without allowing for expansion or delivering new employment sites elsewhere in the city.

The findings of the testing (section 5.1.3 of [CSD.004a](#)) identified that across all the strategy alternatives, there would be some level of positive impact for economic growth, even under a housing focused strategy (because new housing is important for addressing a key barrier to economic growth, which is employees being able to live close to their employment). However, in terms of meeting housing need, whilst a housing focused growth strategy would have positive

impacts to varying degrees, the employment focused strategies would have negative impacts (creating more jobs but not balancing this with new housing to meet employees' needs).

The appraisal findings were supported by findings from the Strategic Housing Land Availability Assessment (SHLAA) ([HEA.004a](#)) and ELNA ([ECON.001](#)). In particular, the SHLAA identified that there is insufficient available land within the city to meet the identified housing need across the plan period, so any strategic choice about land that can support more housing and help to reduce this deficit, even if marginally, will have positives for the housing objective. However, the ELNA identifies that the need for employment floorspace can be accommodated across existing sites in the city without the need for new or expanded sites. As long as the strategy therefore avoids reducing available employment sites, the Plan should be able to avoid negative impacts on this dimension of economic growth (though of course there can be other factors that influence economic growth beyond just supply of sites).

In light of the remaining unmet housing need under all growth strategy alternatives considered, officers sought to identify whether there were other untested alternatives that could unlock more homes, such as by transitioning more of the existing employment land to housing uses. However, there were a couple of reasons why this was not considered to be a reasonable alternative.

Para 86 (e) of the NPPF (2024) identifies the importance of planning for economic needs not anticipated in the plan as well as enabling a rapid response to changes in economic circumstances. At the moment, as discussed in [BGP.001d](#) (para 4.10), Oxford is in a position where delivery of certain commercial floorspace typologies appears to be more profitable than other traditionally higher value uses, such as housing. As has been highlighted by various international events in recent years, economic circumstances can change quickly, and this situation could shift in future meaning that existing sites suddenly need to be protected from being lost to other uses. Failure to continue to protect some element of existing employment provision would not be in accordance with national policy.

If a growth strategy were to consider transitioning at least some of the employment sites to housing through allocating them for housing, the NPPF requires that site allocations meet certain standards, such as being suitable, available, achievable. A factor in demonstrating that a site is 'available' is a landowner's intentions for the future of their site.

The City Council has run several calls for sites whilst developing the Local Plan and has engaged regularly with landowners, including those linked with the key employment sites in the city. As part of discussing allocations with these landowners, officers explored future intentions on the sites including building homes, however, it is the nature of many of the employment sites that they support long standing, successful businesses with no aspirations to change to housing. There may also be reasons why it is inappropriate to incorporate a minimum housing requirement on a site, particularly if this impacts flexibility to respond to future needs linked with the operation of the site. Reducing the existing employment sites through allocations for housing was therefore not considered to be a reasonable alternative.

Nevertheless, whilst additional reasonable alternatives were not identified in terms of the growth strategy for the above reasons, it should be noted that the Council did consider options

within the framework of the chosen growth strategy that could further help to support positive impacts for housing in regards to employment land. As part of the preferred options stage, the consultation included policy options set 004a-3 (which is reproduced in the appendix of [BGP.001d](#)), which considered whether an element of housing should be supported on existing employment sites and this included a high-level appraisal against the SA objectives. Ultimately, this was carried forward to the permissive approach taken as part of Policy E1 in the Local Plan, which allows for an element of housing delivery across all employment sites in the city in recognition of the city's acute housing need.

In summary, it is considered that all reasonable alternatives have been identified and appraised appropriately in relation to the balance that the growth strategy needs to strike between protection of employment sites and providing for housing need.

Q2 In considering and testing high-level growth options, how have other policy requirements shaped strategic decisions, such as Policy G1 and the protection of 'Core Spaces'?

The relationship was generally the reverse, in that the specific policy requirements flowed from decisions taken in relation to the growth strategy, rather than the growth strategy being influenced by the policies, though sometimes similar considerations applied.

The starting point for the Local Plan is the vision which establishes a preferred 'destination' for Oxford to reach by 2045. The Local Plan's vision is underpinned by 6 themes, each of which is supported by a number of objectives which cover a broad range of issues. The themes and objectives respond to local challenges in the city, framed around the three pillars of sustainability and their overlaps, addressing issues such as: providing new housing; supporting health and wellbeing; protecting and enhancing the natural and historic environment and; supporting the economy.

Fulfilling the vision is not possible just by identifying some underlying themes and objectives. This is because doing so necessitates choices being made about how to best service the different themes and objectives with different ways that they can be balanced and prioritised, and varying levels of trade-off between them in the process. As set out in the Regulation 19 SA report's chapter 4, whilst the themes/objectives sometimes complement each other, some are also in competition (e.g. supporting development versus protecting open spaces).

The growth strategy was generally envisioned as a collection of high-level strategic choices, relating to different parts of the themes and objectives, which would help to shape the overall route that the Local Plan takes to achieve its vision. Because the themes and objectives can be balanced in different ways, there is more than one possible growth strategy (collection of high-level choices) which the City Council could consider (though the options are not infinite due to the limits of national policy and the city's constrained nature). The testing in the SA was therefore about exploring the different ways that the vision/themes/objectives could be achieved through appraisal of reasonable alternatives for what the Oxford Local Plan 2045 growth strategy would look like.

The Sustainability Appraisal ([CSD.004](#)) tested different growth strategy alternatives. These were, to prioritise housing or to prioritise employment. Within those two choices, three sub-options were considered - boost brownfield supply, boost greenfield supply, or balance development. Option 1a (prioritise housing; balanced development) is the favoured growth strategy and that leads to the plan's spatial strategy.

The Local Plan includes policies and site allocations that help to implement the overarching growth strategy by setting the instructions for managing change and growth in the city as new development comes forward. The implementation of one growth strategy, with a certain balance struck between servicing the Local Plan themes/objectives, compared to another strategy involving a different balance, required different sets of choices about the scope and mix of policies in the Local Plan.

For example, a growth strategy that prioritises the delivery of housing (responding to the longstanding challenges around access to a healthy and affordable home in the city) compared with a strategy that prioritises delivering another use like employment, will require different choices about policies affecting supply of land for development. Meanwhile, a growth strategy that prioritises maximising the capacity of sites for new development over achieving any other objectives, would likely have reduced policy requirements about what extra features are incorporated onsite, to a growth strategy that seeks to balance capacity of sites whilst seeking to secure multiple benefits arising from green features.

Of course, whilst some policies might look similar under all strategies (particularly those responding to a national policy requirement such as protecting designated heritage assets), some other local requirements will look quite different depending on the chosen approach because they have a greater role in helping to shape them. As such, more consideration was required for some policy areas than others, but only as far as needed to help differentiate between the growth strategies.

For example, a significant influence on growth in the city and the way in which the Local Plan can meet a variety of aims and objectives is the approach to protection of green space. Some growth strategy alternatives, including our chosen strategy, allowed for protection of a network of green spaces whilst allowing some lower quality greenfield sites to be developed. Other growth strategy alternatives, such as the greenfield boost ones, sought to limit this protection to a smaller selection of sites (e.g. only those with intrinsic designations), allowing more greenfield sites to be developed. Implementing one or the other would have different implications for policies such as those protecting green infrastructure, for example:

- Implementing the chosen growth strategy meant the Local Plan needed some form of policy that protected a network of green spaces (as under Policy G1). Also, to allow for some lower quality green spaces to be redeveloped where necessary, the policy needed to set an appropriate framework of protection that provides clarity on what sites might be able to be developed, with expectations for how this should be addressed, whilst also protecting other higher quality sites more fully (driving the decisions about core and supporting within Policy G1).
- Implementing the greenfield boost alternative would still have required a strategy for protecting a network of green spaces (as a requirement of the NPPF 2024), however, the

hierarchy of protection might have looked different or perhaps not have been required at all.

In summary, it's not that the requirements of the Local Plan's policies had an impact on the growth strategy appraisal, but that policy requirements flow from the chosen growth strategy. The City Council may have selected different preferred approaches to policies if an alternative growth strategy had been selected.

Q3 How were the Areas of Focus considered as part of the plan-making process through the SA, including consideration of an alternative spatial strategy?

As discussed in the previous answers to Q1 and Q2, the growth strategy testing as presented in Section 5.1 of the Sustainability Appraisal ([CSD.004a](#)) was focussed on testing various alternatives for the high-level approach to growth and land use in the city. In particular, that testing explored how to balance competing needs for housing and employment, and how best to deliver this in the most appropriate locations. From the chosen growth strategy ultimately flowed the spatial strategy of the plan (explained further in response to Matter 3, Issue 1, Q1).

The rationale behind the Areas of Focus and their purpose is discussed in greater detail in response to Matter 3, Issue 1, Q2, but in summary, these are areas where significant development is expected, where a co-ordinated approach to its delivery and supporting infrastructure is needed, or areas that are particularly sensitive to the level of development expected. Because of this, and to support the implementation of the spatial strategy, it was determined that these locations would benefit from more detailed and focussed policies to help ensure that growth is managed effectively with a more comprehensive approach across each area by identifying key principles in terms of design, connectivity and infrastructure.

These policies are therefore about ensuring a comprehensive approach to the design of development in particular areas of the city, setting out how the general policies of the Local Plan can be met in a coordinated way across these areas. In doing this, the Area of Focus policies align with the other policies of the Plan and help to show how they should be implemented in these specific areas. They do not seek to change the approaches set out in these other policies, for example, they do not seek to 'focus' more development in these areas; or set out appropriate uses, expected densities, or to change policy requirements such as affordable housing. For this reason, the AoF policies are considered to implement the spatial strategy, but are not themselves a spatial strategy choice against which alternatives can be tested through the SA process.

Q4 Where sites are concerned, how did the SA test the proposals in the Plan against reasonable alternatives?

When identifying reasonable alternatives in respect of site allocations, there are a couple of key considerations:

- Site allocations are expected to meet certain standards according to national policy/guidance, including that they are suitable, available and achievable. It would not be considered justifiable to put forward site allocations which fail to meet these standards, so they are not considered to be 'reasonable alternatives' for the purposes of the Sustainability Appraisal process.
- As set out in the Environmental Assessment of Plans and Programmes Regulations 2004, reasonable alternatives need to take into account the objectives and geographical scope of the plan. Where the allocation of a site could conflict with the Local Plan's objectives, it was also not considered to be a reasonable alternative.

The identified housing need for the city is established by the standard method, which for Oxford is 1,078 homes per year ([CSD.009](#)). The Strategic Housing Land Availability Assessment (SHLAA, [HEA.004a](#)) details how the Council has considered the development potential of sites in the city identified from a wide range of sources and also considers the sites against the criteria set out above, helping to inform which sites are options for potential site allocations. As has been the case for many years, the City Council's evidence base continues to confirm that the city cannot meet its identified housing need.

This means that the Local Plan has taken a capacity-based approach to setting its housing requirement in light of having insufficient land supply to meet Oxford's identified needs. It also means that in relation to identifying site allocations, the City Council has sought to take forward as many site allocations for residential development as possible wherever they can meet the criteria above (e.g. suitable, available and achievable) — rather than picking and choosing between alternative options—and as long as they do not conflict with other parts of the Local Plan's strategy and objectives.

In relation to the other parts of the strategy and objectives, the Local Plan 2045 has a vision, underpinned by 6 themes, each of which is supported by a number of objectives which cover a broader range of issues than just housing delivery alone. The themes and objectives respond to local challenges in the city and feed from the three pillars of sustainability and their overlaps, addressing issues such as: supporting health and wellbeing of residents; protecting and enhancing the natural and historic environment; supporting the economy etc.

Of course, there are various ways to meet the vision/themes/objectives of the Local Plan 2045 even in Oxford's constrained context and this depends upon the growth strategy. In practice, different overarching growth strategies could have different results in terms of what sites were ultimately determined to be reasonable for allocation from a list of those able to meet the principles of being suitable, available and achievable. It could also influence the detail of the allocation policies in terms of what uses should come forward on a site and in what way. As such, the Sustainability Appraisal process undertook testing of a number of reasonable alternatives for the overarching growth strategy option, and this is set out in Chapter 5/section 5.1 of the Reg 19 SA report ([CSD.004a](#)).

Even when identifying the reasonable alternatives for this appraisal of the overarching growth strategy as set out in the Reg 19 SA report, there were limited options in terms of truly 'reasonable' alternatives due to Oxford's heavily constrained setting (e.g. the various intrinsic environmental constraints such as nationally designated sites and flood zone 3b). The preferred

approach was to prioritise housing, responding to the significant housing need in the city, whilst taking a balanced approach to meeting the Local Plan's other objectives. Alternatives, however, looked at what would happen should the City Council prioritise employment growth, as well as what would happen should the capacity of land in the city for either housing or employment be 'boosted' across brownfield and greenfield sites.

As the appraisal in Table 5.2 of the Reg 19 SA report identifies, even under the alternative 'boosted' scenarios, whilst there are additional benefits for housing provision or employment growth, these would be limited somewhat due to the constrained nature of the city. Even by scaling back locally set policy requirements that restrict capacity onsite (e.g. greening requirements), as well as reducing the network of protected open space, there are limited extra sites that could become reasonable alternatives to explore for allocation (subject to there also being landowner interest).

Nevertheless, as set out in section 5.1.3 of the Reg 19 SA report, the preferred approach performed well, in that it was associated with comfortably the most positive and fewest negative sustainability impacts identified.

In summary, the SA has primarily used the testing of the overarching growth strategy as the channel through which proposals in the plan in relation to sites are explored against reasonable alternatives, although at the strategic scale these alternatives are limited. Because of the lack of available sites to meet the city's housing need, all sites are generally taken forward for allocation where they meet the national policy/guidance expectations for a site allocation and do not conflict with the Local Plan's vision/themes/objectives including as expressed through the overarching growth strategy.

Q5 How does the SA consider relevant economic, social and environmental objectives where the precise scale of housing is unknown on some allocations?

As discussed in Q4, for potential housing site allocations, the focus of the Sustainability Appraisal process was not in helping to choose between potential sites (as all potential sites for housing are generally taken forward where they meet the relevant criteria). The Sustainability Appraisal is instead used to help assess the potential for development on suitable sites by identifying any potential sustainability effects that could arise as a result of development. It does this by using an adapted version of the SA framework specific to sites (illustrated in section 3.4.2 of the Reg 19 SA report).

The adapted SA framework for sites incorporates site-specific criteria which are used to appraise the potential impacts of an allocation in relation to the SA's various social, environmental and economic objectives. The criteria do not generally require an exact knowledge about the scale of development that will come forward and they are use-class blind, although there are particular criteria relating to objective 4. (local housing needs) which are generally not of relevance to non-residential allocations.

To be included as a site allocation policy within the Local Plan, the expectation for residential allocations is that the sites have the potential to deliver at least ten dwellings net gain (or an

equivalent in student rooms). Whilst the majority of the policies set a minimum housing requirement for the site, there are 9 residential/mixed use site allocations which do not, and we assume these to be the ones referred to as sites with ‘unknown’ scale in the question.

As is detailed in section 5.3.2 of the Reg 19 SA report ([CSD.004a](#)), and more extensively through [BGP.002](#), the list of site allocations in the Local Plan was determined through a multi-stage process that considers potential sites from a wide range of sources. Illustrated in Table 5.13 of the Reg 19 SA report, the potential list was refined in a couple of stages that are linked with the Strategic Housing Land Availability Assessment (SHLAA, [HEA.004a](#)), looking at factors such as national policy; insurmountable environmental or physical constraints and deliverability considerations (e.g. landowner intentions). Ensuring sites could potentially deliver at least 10 dwellings net gain was another consideration in these stages.

As such, the City Council allocated sites with a high-level expectation about the level of housing that could be accommodated. Whilst the precise scale of housing for a site is not usually known exactly at plan-making stage, an estimated development capacity assumption is identified for most of the sites even if some of the site allocations themselves do not contain a minimum number (capacity assumptions set out in SHLAA Table B [HEA.004b](#)).

Following the same approach undertaken in previous Local Plans, the City Council has integrated the Sustainability Appraisal into its site assessment/refinement process. Table 5.13 of the Reg 19 SA report illustrates that SA assessment forms the second part of the process that the potential site allocations which have passed the first stages linked with the SHLAA are subjected to. To reiterate, having got to this stage of assessment, the assumption was that each site has no fundamental issues to prevent allocation and (for residential allocations at least) should be able to deliver a minimum of 10 dwellings, and the SA site assessment was carried out in this context.

A version of the SA assessment using the site-specific SA framework for each potential allocation identified in the Reg 18 consultation was prepared based upon the available information at the time. These interim assessments were then revisited and updated as the fuller detail of the site allocation policies came together subsequent to the Reg 18 stage and republished at Reg 19 stage in Appendix C of the SA report ([CSD.004b](#)). The final scoring of all the allocations in their individual SA site assessments at Reg 19 stage is also summarised in Chapter 6/Table 6.2 of the Reg 19 SA report.

The review and update between Reg 18 and Reg 19 was important as it allowed for updated information and the improved understanding of each site, which came as officers developed the allocation policies further, to be factored into the appraisal. Updated information included any further updates from landowners in relation to their plans; key considerations arising from the separate site capacity assessment (folder [016 CAP](#)), which considers a variety of urban design factors to determine a realistic capacity figure for each site; as well as other workstreams (e.g. Strategic Flood Risk Assessment; Source Pathway Receptor Analysis; Heritage Impact Assessments; specialist officers' comments covering issues like archaeology and ecology etc).

In relation to the 9 residential/mixed use site allocations without minimum numbers referenced

earlier, there are two main reasons why a minimum number of homes is not included in these allocation policies and these go beyond the Sustainability Appraisal. Firstly, 7 of those allocations are on hospital/medical sites. For some of hospital allocations, as explained in the SHLAA (paragraph 2.62 HEA.004a), a minimum capacity assumption is not included because their primary use remains as healthcare. Whilst the Trusts are committed to delivery of housing and have plans to bring that forward across their respective estates, full flexibility is needed in order that they can respond to changing needs by the management of their estates, and healthcare needs should not be compromised by having a minimum housing requirement on each of their specific sites. Secondly, two of those sites are particularly complex (Policy SPS8 Meadow Lane) and (Policy SPCW3 Canalside) and whilst the City Council has a good degree of confidence that each can deliver at least 10 homes, there are particular sensitivities which necessitate greater flexibility.

The City Council has nevertheless considered relevant economic, social and environmental objectives for those allocations with them being put through the same SA site assessment as the other sites (in the Reg 19 SA report Appendix C [CSD.004b](#)). As mentioned above, the assessment process was iterative as the Local Plan developed, and was informed by a range of available information about the context of the sites, including from the capacity assessment forms produced for every site. For some of the sites, including Meadow Lane and Canalside, this was supported by the assumptions about capacity which are published as part of the SHLAA work (Table B: [HEA.004b](#)). On the hospital sites, the SA site assessment forms clearly identifies (under the housing provision objective 4.) that this will depend upon implementation.

The SA site assessment process was important for understanding sustainability impacts of the potential allocations and also informing need for any mitigations which could be incorporated into the final policy wording where relevant. Chapter 7/section 7.2 of the Reg 19 SA report details how the mitigation of significant sustainability effects was incorporated into the final drafting of the allocation policies – principally in the inclusion of specific policy requirements to address potential impacts. For the allocations without minimum numbers (including those mentioned above, as well as the primarily employment-focussed allocations also in the Plan), the SA process has similarly helped to inform what is set out in terms of their necessary mitigations.

Ultimately, whilst not all allocations have a minimum number, and the precise scale of housing may not be known, the City Council is of the view that the process detailed above has helped to ensure that the SA has considered the relevant economic, social and environmental objectives and helped to inform the drafting of these policies at a proportionate and reasonable level of detail for the plan-making stage. Where relevant, it has, alongside other evidence base work, helped to inform necessary mitigation requirements incorporated as part of the wording of the policies.

Q6 Has the preparation of the Plan met the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Planning and Compulsory Purchase Act 2004? If not, what actions are necessary at this stage to

remedy any issues relating to matters of legal compliance?

The Council has met the overlapping requirements of these pieces of legislation throughout the preparation of the Local Plan and has published its emerging Sustainability Appraisal work at the key stages of consultation to help evidence this.

The Reg 19 SA report ([CSD.004a](#)) brings together the findings of the full Sustainability Appraisal carried out to inform the preparation of the Local Plan. The document responds to the requirement of the Planning and Compulsory Purchase Act 2004 to undertake sustainability appraisal of the proposals in the Local Plan during the Plan's preparation, and to prepare a report of the findings. Planning practice guidance and case law identifies that this should be an iterative process, thus alongside the version published at Reg 19, the Council published an interim Reg 18 version of the report earlier in the process (see para 2.17 and Table 2.3 of [CSD.004a](#) which details the various stages of consultation undertaken).

The SA process has factored in likely environmental, social and economic effects of the proposals in the Local Plan, section 3.4 of the report sets out the SA framework which was developed to do this. Shaped by the information gathered as part of the scoping stage (Chapter 3 of the report), the SA framework is an important tool which has helped ensure that the sustainability effects of a plan are appropriately identified, described, analysed and compared. There are two versions of the framework, one for policies and an adapted version for site allocations. The framework has been kept under review and updated based on feedback, such as from the environmental bodies, throughout the process. The methodology has helped to ensure that the Council has taken an integrated approach to considering all three pillars of sustainability in line with national policy guidance.

Particular attention has been paid to the range of potential environmental effects, as is a legal requirement within the Environmental Assessment of Plans and Programmes Regulations 2004. Alongside likely effects in respect of social and economic factors, the Council has sought to consider likely significant effects on the environment including in relation to the specific issues identified in Schedule 2 of that legislation; table 3.4 and table 3.5 in section 3.4.1 help to illustrate how the SA framework addresses these.

The Environmental Assessment of Plans and Programmes Regulations 2004 sets out that the environmental report should address a range of topics as set out in Schedule 2. For ease and clarity, table 2.2 in section 2.3 of the Reg 19 SA report clearly summarises the various requirements and signposts to where these have been addressed in the report.

As table 2.2 sets out, many of these topics are addressed through the Sustainability Appraisal scoping work, which makes up chapter 3 of the Reg 19 SA report. For example, the scoping chapter identifies the broader policy context including relevant plans and programmes (section 3.1); as well as the current baseline sustainability context for the city, including relevant aspects of the current state of the environment and existing environmental problems including for areas of particular environmental importance (section 3.2). The scoping work made an assessment of the current situation as well as of the likely future without a new Local Plan (also in section 3.2).

This scoping work, as presented in chapter 3, is supplemented by the deeper topic-specific analysis presented in the range of supporting background papers which form part of the Sustainability Appraisal. Table 2.5 in chapter 2 details the relevant background papers, and each of these is structured similarly, with headings that correspond to sections in the main Sustainability Appraisal.

Reflecting the iterative process that the Sustainability Appraisal has gone through, an initial draft of the scoping work, along with the supporting background papers was shared with the environmental bodies early in the plan-making process to ensure that the scope and level of detail was appropriate (also an important step identified in the Environmental Assessment of Plans and Programmes Regulations 2004). A record of the initial feedback and how the Council subsequently responded, including in updating the work, is included in Appendix A of the Reg 19 SA report for reference. The updated scoping work, alongside updated background papers was then published for broader feedback as part of the Reg 18 Local Plan consultation.

Beyond the scoping stage of the process, the Council has considered sustainability impacts of the emerging Local Plan, including reasonable alternatives which take into account the objectives and geographical scope of the plan, at different points in the plan-making process. Chapter 5 describes the reasonable alternatives that the Council came to identify and proceeds to evaluate these using the SA framework discussed earlier. The chapter discusses the alternatives considered in relation to the overarching growth strategy for the plan, such as priority for housing versus employment and how this should come forward. The chapter also discusses reasonable alternatives for a select number of thematic policies within the plan that were identified as having options with potential for likely significant effects after a high-level screening of every policy's set of options in advance of Reg 18 consultation (these are recorded in the appendix of the applicable background papers), as well as how allocations have been approached.

Chapter 6 of the Reg 19 SA report documents the Whole Plan appraisal (Chapter 6) which identifies, describes and evaluates the likely significant effects of implementing the plan on the environment, and the other dimensions of sustainability, using the SA framework. This is broken down into policies (table 6.1), allocations (table 6.2) and then the plan as a whole (table 6.3). The different aspects of the Whole Plan Appraisal seek to differentiate between different types of impact as far as is reasonable (e.g. direct, indirect, short or long term, temporary or permanent) as can be seen in tables 6.4 and 6.5, for example.

This appraisal process was important in helping to identify where mitigation was needed which could prevent, reduce and as fully as possible offset any significant adverse effects arising from implementing the Local Plan's proposals. As is detailed in Chapter 7 of the Reg 19 SA report, many of the Local Plan's policies are in of themselves mitigation measures that had already been built in for addressing likely significant effects arising from development being planned for (though some effects also cannot be entirely mitigated through the Local Plan's measures). In relation to site allocations, the individual site assessments using the adapted SA framework for sites helped to identify likely significant effects, and section 7.2 details how officers sought to ensure these were addressed, typically through appropriate cross references to development management policies or other site-specific wording.

Following adoption and implementation of the Local Plan, it will be important to ensure that impacts and sustainability effects are regularly monitored. As such, a targeted and pragmatic monitoring framework has been devised which seeks to make best use of the Council's available capacity and resources and is set out in Chapter 8. As illustrated in table 8.1, the framework seeks to ensure that the impacts against the SA objectives are monitored either yearly, integrated alongside the Authority Monitoring Reports or at slightly longer timescales.

The Council has sought to ensure that consultation has been undertaken throughout the process of the Local Plan's development and that these consultations were run for an appropriate amount of time to enable consultation bodies and the public consultees an effective opportunity to express their opinion on the relevant documents. The Reg 19 SA report was made available for comment at the submission draft plan consultation stage (Regulation 19) as the legislation requires, however, the Council also published an interim SA report alongside the Reg 18 consultation that included as much available information as possible, reflecting the emerging nature of the Local Plan at that point. Whilst there was limited feedback on the interim SA report, this is summarised in section 3.5 of the Reg 19 SA report, including Council responses. The feedback on the Reg 19 SA report is detailed in the consultation statement in the examination library (Document [CSD.003 - Appendix 3](#)).

Ultimately the Regulation 19 feedback did not suggest any significant omissions in relation to the process undertaken and the City Council considers that it has met all the requirements of the legislation. As set out at Issue 1 Question 1 above, earlier in the year a claim made was that the resolution to submit the plan was in breach of the requirements at Regulation 8(2) Environmental Assessment of Plans and Programmes Regulations 2004, however, a consent order was agreed with the claimant, signed and approved by the High Court on 25th June 2026 discharging the injunction which had prevented submission.

Issue 4 – Habitat Regulations Assessment

Q1 Is the HRA justified in screening-out the Cothill Fen Special Area of Conservation ('SAC') and the Little Wittenham SAC based on their distance from the plan area?

The City Council considers that the HRA is justified in “screening out” Cothill Fen SAC and Little Wittenham SAC from further HRA assessment. This decision was based on the reasoned justification and rationale provided in paragraphs 4.1-4.13 on pages 13-15 of the Habitat Regulations Assessment (HRA) Screening Report ([PCD.007](#)). The sites were not screened out because of their distance from the plan area, but because of analysis of the critical pathways.

The Habitat Regulations Assessment (HRA) Screening Report (June 2025) Examination Library reference [PCD.007](#) (hereafter “the HRA Screening Report ([PCD.007](#))”), was published to support the Regulation 18 consultation which took place in summer 2025. This document provides clear a clear reasoned justification as to why Cothill Fen SAC and Little Wittenham SAC were “screened out” from further HRA assessment.

Paragraph 3.2 on page 13 of the HRA Appropriate Assessment Report ([CSD.005](#)) explains that the focus of the screening update was the Oxford Meadows SAC. This paragraph also sets out that the HRA Screening Report ([PCD.007](#)), provides more information and details the reasoning and rationale as to why the Cothill Fen SAC and Little Wittenham SAC were screened out from further HRA assessment. Paragraphs 4.4-4.8 on pages 13-14 of the HRA Screening Report ([PCD.007](#)) consider each of the potential impact pathways identified in Table 4.1 for Cothill Fen in relation to policies in the Oxford Local Plan, while paragraphs 4.9-4.12 on pages 14-15, consider the potential impact pathways for Little Wittenham SAC.

Each sub-section provides a reasoned justification and rationale as to why each impact pathway was unlikely to give rise to significant effects at Cothill Fen SAC, or Little Wittenham SAC from the Oxford Local Plan. Based on the application of the impact pathway approach, paragraph 4.13 on page 15, it was concluded that these two European sites could be screened out from further assessment.

Natural England did not raise a specific objection to screening out Cothill Fen SAC or Little Wittenham SAC. However, its Regulation 18 response raised wider concerns about the HRA, particularly ‘in-combination’ impacts. Following further engagement, and the updated assessment, the Statement of Common Ground with Natural England ([COM.009](#)) records that Natural England had no fundamental or significant concerns with the Plan or its supporting evidence, including the HRA, and that there were no outstanding HRA concerns. See [COM.009](#) paragraphs 2.4-2.6 and 4.1-4.2).

Q2 What is the justification for finding that the Plan, either alone or in combination with other plans and projects, is unlikely to have a significant effect on air quality at the Oxford Meadows SAC?

The justification for finding that the Plan, either alone or in-combination with other plans and projects, is unlikely to have a significant effect on the air quality at the Oxford Meadows SAC, was based on the findings from traffic modelling.

Paragraphs 4.23-4.25 of [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitat Regulations \(June 2018\)](#), (hereafter "the NE Air Quality Advice Note"), set out that, depending on the information available, the outputs from traffic modelling can be used as a 'proxy' for emissions.

The findings from the traffic modelling, and how it was used to inform the HRA is set out in Chapters 5 and 6 of the HRA Screening Report ([PCD.007](#)) and Chapter 4 of the HRA Appropriate Assessment ([CSD.005](#)), which provides an update to the air quality screening using the proposed dwellings and jobs/floorspace coming forward as a result of the Oxford Local Plan Proposed Submission Document (CSD.001).

Paragraph 4.9 of the Habitat Regulations Assessment (HRA) Screening Update and Appropriate Assessment ([CSD.005](#)), (hereafter "the HRA Appropriate Assessment ([CSD.005](#))"), sets out that Natural England agreed to the use of the proposed traffic modelling, and also agreed that the screening conclusions in relation to Oxford's "alone" assessment were below the AADT screening threshold.

The NE Air Quality Advice Note sets out a four-step process when undertaking HRA screening. The first three steps involve the following:

- Step 1: Does the proposal give rise to emissions which are likely to reach a European site?
- Step 2: Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Step 3: Could the sensitive qualifying features of the site be exposed to emissions?

Paragraphs 5.4-5.18 on pages 26-30 of the HRA Screening Report ([PCD.007](#)) document the application of Screening Steps 1-3.

Once these steps were completed, traffic modelling, which had been undertaken to consider whether there could be potential significant impacts on the Oxford Meadows SAC, and for the dual purpose of assessing potential impact of Plan on the Strategic Road Network (SRN), was used to inform Step 4 which involves the application of the screening thresholds.

In the NE Air Quality Advice Note, Step 4 consists of three sub-steps, which are set out below:

- Step 4a: Apply the threshold alone
- Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects
- Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects

Chapter 6 of the HRA Screening Report ([PCD.007](#)) considers each of steps 4a-c in turn and then sets out the outputs from the traffic modelling. Paragraphs 6.20-6.27 on pages 39-41, set out the 'alone' assessment process, and the results from the traffic modelling are shown at Tables

6.3 and 6.4 on page 41. As these figures were below the screening thresholds, a conclusion of no likely significant effects ‘alone’ (Steps 4a and 4b), was reached.

The ‘in-combination’ assessment findings were discussed at paragraphs 6.28-6.35 on pages 42-44 of the HRA Screening Report ([PCD.007](#)) and report at Tables 6.7 and 6.8 on page 43. The tables show the cumulative assessment which considered the changes in traffic flows from the emerging plans of relevant neighbouring authorities cumulatively, with the changes from the Oxford City Council ‘alone’ assessment. Drawing the conclusions that when these cumulative changes in traffic flows were considered together, this resulted in a level of change that was below the screening threshold (Steps 4b and 4c).

The HRA Appropriate Assessment Report ([CSD.005](#)), which was published to support the Local Plan 2045 Regulation 19 Proposed Submission Document ([CSD.001](#)) (hereafter “the Reg. 19 Plan”) contained an update to the air quality screening previously undertaken to support the Regulation 18 consultation stage. This update considered whether there were any changes to the housing numbers or the number of jobs/employment floorspace figures.

There were no significant changes to the numbers of homes and jobs/floorspace coming forward in the plan, which remained less than the land use assumptions that informed the traffic modelling. This means that the traffic modelling data from the ‘alone assessment’, as set out in Chapter 6 of the HRA Screening Report ([PCD.007](#)), and Chapter 4 of the HRA Appropriate Assessment Report ([CSD.005](#)) remained valid, as did the conclusions regarding no likely significant effects of the Oxford Local Plan ‘alone’ (Step 4a and 4b review).

With regards to ‘in-combination’ impacts, following the Regulation 18 consultation, Natural England advised the City Council to ensure that the City Council contact neighbouring authorities to ensure that the inclusion of the latest modelling figures had been included in the City Council’s ‘in-combination’ assessment. Paragraphs 4.12-4.17 on pages 21-22 of the HRA Appropriate Assessment ([CSD.005](#)) set out how the City Council followed Natural England’s advice to ensure the use of current data.

As the latest modelling figures inputs were “current”, the conclusions to the Screening Update in Chapter 4 of the HRA Appropriate Assessment ([CSD.005](#)) with regards to ‘in-combination’ impacts also remain valid (i.e., that the Oxford Local Plan, both ‘alone’, and ‘in-combination’ would be unlikely to have a significant effect on air quality at the Oxford Meadows SAC (Steps 4b and 4c review)).

Q2 (cont.) How has the Council followed the advice provided by Natural England (referred to in Regulation 19 representations) and how does this lead to the conclusions in the HRA?

The City Council was careful to ensure that Natural England was fully involved in the HRA process, approving methodological choices and reviewing emerging outputs as the work progressed. The City Council has followed the advice provided nationally by Natural England and the bespoke advice provided to Oxford specifically for example through their representations to the Regulation 19 consultation stage ([REP.3-090](#)). The advice provided supports the approach taken

by the City Council in arriving at the conclusions in the HRA Appropriate Assessment Report ([CSD.005](#)) in relation to 'alone' and 'in-combination' air quality impacts.

Annex A of Natural England's response to the Regulation 19 consultation ([REP.3-090](#)) sets out the "Natural England Standard Advice for Air Quality Impacts for Local Plans". This Standard Advice sets out the types of emissions likely to be associated with the delivery of Local Plans and stresses the importance of considering air quality impacts both cumulatively and strategically.

The City Council has reviewed the Steps set out in Table 1 of the Standard Advice and considers that these steps have been followed in undertaking the Air Quality Assessment for the Oxford Local Plan 2045. The Standard Advice recommends the use of the NE Air Quality Advice Note when dealing with air pollution impacts generated from traffic.

Chapters 5 and 6 of the HRA Screening Report ([PCD.007](#)), as supplemented by Chapter 4 in the HRA Appropriate Assessment ([CSD.005](#)) follow the steps set out in the NE Air Quality Advice Note, as recommended by the Standard Advice.

The City Council has also reviewed Table 1 in the Standard Advice and considers that the steps 1-4 have been followed, using, as recommended in the NE Air Quality Advice Note, the outputs from traffic modelling, as a proxy for emissions.

Table 1- Alignment of Oxford City Council's Air Quality Screening for the HRA with Natural England's Standard Advice

Standard Advice Table 2.1	Oxford City Council HRA (based on the NE Air Quality Advice Note)
Could emissions reach the site?	
Step 1: Check Distance criteria - could significant emissions reach a protected site?	Step 1: Does the proposal give rise to emissions which are likely to reach a European site?
Step 2: Are the qualifying habitats/species sensitive to air quality impacts	
Step 2: Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts	Step 2: Are the qualifying features of sites within 200m of a road sensitive to air pollution?
Additional Step undertaken by Oxford City Council	
	Step 3: Could the sensitive qualifying features of the site be exposed to emissions?
Step 3: Undertake Modelling	
Step 3: Undertake detailed modelling	Traffic modelling undertaken as a proxy for air quality modelling as recommended in NE Air Quality Advice Note
Apply Screening Threshold 'alone'	
Step 4a: Apply Screening Threshold Alone	Step 4a: Apply the threshold alone
Apply Screening Threshold 'in-combination'	

Step 4b: Apply Screening Threshold in-combination.	Step 4b: Apply the threshold in-combination with emissions from other road traffic plans and projects
	Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects

As shown in Table 1, the Oxford City HRA screening follows the process recommended in Natural England's Standard Advice in reaching the conclusions set out in the HRA.

The Statement of Common Ground with Natural England ([COM.009](#)) sets out, at paragraph 4.2, that that Natural England agree that there are no outstanding issues of concern in relation to the Habitat Regulations Assessment. Appendix 1 of [COM.009](#) also sets out that Natural England agree that their representation in relation to the Habitat Regulations Assessment has been satisfactorily addressed and common ground has been reached.

Where recreational disturbance is concerned, a visitor survey was conducted in May 2025 to inform the Plan. The aim of the survey was to understand how the Oxford Meadows SAC was used by residents, having particular regard to dog walkers.

Q3 Was the survey adequately robust and detailed enough to inform strategic decisions about sites and likely mitigation required? If not, what alternative sources of evidence could have informed plan-making decisions?

The City Council considers that the survey was sufficiently robust and detailed in order to inform strategic decisions about sites and likely mitigation required.

The Oxford Meadows SAC is particularly sensitive to recreational impacts due to the increased nutrification associated with dog fouling. The visitor survey was therefore undertaken to understand how Port Meadow, which forms part of the Oxford Meadows SAC, was used by the population of Oxford, and visitors from outside the city, including dogwalkers. The survey itself was carried out on a range of weekend and weekdays during May 2025 on dates that were both within and outside the "summer" school half term. The reason the survey was undertaken in May was to ensure that the results were representative of a more "peak use" period, than at other times of the year. The access points were chosen as these represent the two main access points to Port Meadow by all modes of transport. While the survey questions themselves were specifically designed to feed into the overall assessment methodology undertaken.

Appendix 3 on page 92 of the HRA Appropriate Assessment ([CSD.005](#)) provides details of the visitor survey report. The survey methodology broadly follows that used by Bracknell Forest District Council in their analysis of the Thames Basin Heaths SPA. This is a long-standing survey technique, recommended to Oxford by Natural England, as an example of best practice, which has been used by the City Council over the years. The survey and methodology replicate

previous visitor surveys carried out in 2011 and 2017, which were used to inform the HRA assessments for numerous planning documents including the Oxford Local Plan 2036 ([DPL.001](#)) and the Northern Gateway Area Action Plan (AAP) ([DPL.002a](#)). The City Council considers that the visitor survey was sufficiently detailed and robust.

The results of successive surveys have informed the higher public open space requirements at Oxford North secured initially through the Northern Gateway AAP ([DPL.002a](#)) as agreed with Natural England through the HRA work was undertaken to support the Northern Gateway AAP ([DPL.002a](#)). The HRA for the Northern Gateway AAP showed that the site was allocated for 500 homes and was situated less than 500m away from the nearest entry point to the Oxford Meadows SAC. As such, the HRA for the Northern Gateway AAP set a higher requirement for public open space to ensure that attractive alternatives to the Oxford Meadows SAC were available to meet the recreational needs of new residents and therefore mitigate the risk from additional recreational pressure on the SAC. The Northern Gateway AAP included a specific requirement to deliver increased public open space at the site (15% as opposed to the standard 10% requirement for qualifying residential developments). Some of the residential units are under construction at Oxford North, known as the “Canalside Quarter”, within which “Canalside Park” is being delivered as an informal recreation space for a range of users including dogwalkers. This higher public open space requirement has been replicated in Policy SPN3 – Oxford North remaining phases as the updated visitor survey which has informed the HRA for the Local Plan 2045 supports the continuation of this approach. As this approach already working at Oxford North it is considered effective.

Q4 Where mitigation is proposed, such as greater open space requirements for certain sites, how will decision-makers ensure that the policies are effective in providing suitable alternatives to the Oxford Meadows SAC?

Only one site allocation in the Oxford Local Plan 2045 (Policy SPN3 – Oxford North remaining phases) proposes a greater public open space requirement (15% as opposed to the standard 10% for qualifying residential development). As set out above, this increased public open space requirement was introduced in order to ensure the availability of attractive alternative public open spaces for new residents (including dog owners). This is because the qualifying plant species – *A. repens* – is sensitive to increased nutrification associated with dog-fowling, but not sensitive to trampling. As such, as part of any new public open space provided, it must, to be effective, include a suitably designed informal recreational space for new residents including dogwalkers. Any informal space provided must therefore be more accessible on a day-to-day basis than the Oxford Meadows SAC. It should therefore be provided at a location that makes it genuinely attractive for dogwalkers.

As such, Policy SPN3 – Oxford North remaining phases, includes a requirement for 15% green public open space to be delivered within the remaining residential phases of Oxford North, which are likely to come forward in line with the current Outline planning permission.

However, in order to ensure that a suitable amount of the right type of public space is delivered as part of the remaining residential phases of Oxford North, the following modification is

proposed to Policy SPN3 within the “Notable ecological features” section. This is to ensure that public open space delivered through Policy SPN3 – Oxford North remaining phases is provided to mitigate potential recreational pressure arising from residential development on the Oxford Meadows SAC:

Add the following paragraph to the ‘notable ecological features’ section of the policy box for Policy SPN3 – Oxford North remaining phases:

Policy SPN3 requires 15% of any part of the site developed for housing to be delivered as publicly accessible green open space for the enjoyment and benefit of residents. This standard is slightly higher than the city-wide standard (10%) due to the size and location of the site and the importance of managing the recreational impact of new residents (and particularly their dogs) on the nearby protected habitat of the Oxford Meadows Special Area of Conservation (SAC). As such, a sufficient proportion of the green open space provided must be located within or directly adjoining areas of residential development and provide an attractive accessible alternative to the SAC for day-to-day recreational uses to mitigate potential pressure on that protected habitat.

Through the implementation of the Northern Gateway AAP ([DPL.002a](#)), the Canalside Quarter (which includes the first phases of residential development being delivered at Oxford North) is delivering “Canalside Park” - an informal amenity green space for walkers, cyclists and dogwalkers. Canalside Park is one of a number of areas of public open space being delivered within the “Canalside” residential phase at Oxford North.

Canalside Park is being delivered through a Reserve Matters (RM) application, granted under the remit of Outline element of hybrid planning application reference 18/02065/OUTFUL, which includes specific references to public open spaces in both the legal agreement (S106), and planning conditions. It is worth noting that, the committee report for the outline planning permission specifically references (at paragraph 10.247) the higher public space requirements (i.e., 15%) associated with this site and the need to provide space for dog walkers to use as an alternative to the Oxford Meadows SAC.

The Canalside Park RM application was supplemented with a document called the “Oxford North Public Space Programme for Canalside Park”. This programme sets out that the delivery of Canalside Park, which is currently in the process of being delivered, is to provide informal amenity green space for walkers, cyclists and dog walkers. This is important as one of the functions of Canalside Park is to mitigate the impacts of recreational disturbance at the Oxford Meadows SAC by providing a suitable alternative public open space.

The policy framework that informs the decision-making process has supported the effective delivery of the right type of public open space at the residential phases of Oxford North. This has enabled appropriately worded planning conditions and legal agreements to ensure the effective delivery of the right type of green public open space in the right place to provide an attractive accessible alternative to the Oxford Meadows SAC for day-to-day recreational uses to mitigate potential recreational pressure on that habitat.

This has resulted in the provision of informal amenity public open space in the form of Canalside Park which serves the informal recreational needs of users including dog walkers, for which it provides a suitable alternative to the Oxford Meadows SAC.

The City Council considers that, with the proposed modification to Policy SPN3 – Oxford North remaining phases, it would be equipped to effectively support the decision-making process by setting out the location and type of green space delivered would mitigated potential recreational disturbance at the Oxford Meadows SAC.

Q5 Have the requirements of the Conservation of Habitats and Species Regulations 2017 as amended been satisfied in preparing the Local Plan?

Yes, the City Council is confident that it has met the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

The HRA Screening Report ([PCD.007](#)) and the HRA Appropriate Assessment Report ([CSD.005](#)) (which includes an update to the air quality screening) use the appropriate legislative tests at each stage of the process. The key legislative tests relating to HRA in the plan-making process are Sections 63 and 64 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Section 63(1) is of relevance to the Oxford Local Plan 2045. This is because the HRA Screening Report ([PCD.007](#)) and HRA Appropriate Assessment Reports ([CSD.005](#)) focus on “European sites”.

The purpose of the HRA Screening Report ([PCD.007](#)) and the “Screening Update” contained in the HRA Appropriate Assessment Report ([CDS.005](#)), was to consider whether the Oxford Local Plan 2045 was likely to have a significant effect on a European site (either ‘alone’ or ‘in-combination’. As such, the screening process carried out to inform the HRA for the Oxford Local Plan 2045 follows the requirements set out in Section 63(1) of the Conservation of Habitats and Species Regulations 2017.

Section 63(1) recognises that where likely significant effects of a Plan on a European site cannot be ruled out, an appropriate assessment of the implications of the Oxford Local Plan 2045 for that site in view of that site’s conservation objectives. The HRA Appropriate Assessment Report ([CSD.005](#)) provides this assessment at chapters 5-8. Where mitigation measures have been proposed, they have been proposed at the “Appropriate Assessment” stage, in line with the “People Vs Wind” judgement (which is discussed in paragraph 1.12) of [CSD.005](#).

Section 63(3) sets out the statutory requirement to consult “the appropriate nature conservation body and have regard to any representations made by that body...”. For plan-making in England and Wales, Natural England fulfils the role of the “appropriate nature conservation body”. The City Council has consulted Natural England as part of the formal plan-making process. Additionally, City Council officers have maintained an on-going dialogue including written correspondence and virtual meetings at key points in the plan-making process

outside the formal consultation process. The Statement of Common Ground with Natural England ([COM.009](#)) provides a record of meetings with Natural England that have taken place throughout the plan-making process (as does the Oxford Local Plan 2045 Cooperation Statement ([COM.001](#))).

Section 63(4) of the Conservation of Habitats and Species Regulations 2017 (as amended) relates to consultation with the “general public”. In relation to the HRA for the Oxford Local Plan 2045, HRA consultation was undertaken both at the formal “Regulation 18” stage and “Regulation 19” consultation stages. The HRA Screening Report ([PCD.007](#)) was published as part of the evidence base at the Regulation 18 consultation stage in June 2025, while the HRA Appropriate Assessment Report ([CSD.005](#)) was published at the Regulation 19 consultation stage in January 2026. Where comments were received from the general public in relation to the HRA, these were considered within the Local Plan 2045 consultation statement and any representations that were made form part of the examination library.

Oxford City Council has undertaken an appropriate assessment in line with regulations. The appropriate assessment concludes that there will be no adverse effect from the Oxford Local Plan, either ‘alone’ or ‘in-combination’ on the integrity of the Oxford Meadows SAC – the European site which, is the subject of the Section 63 appropriate assessment.

Issue 5 – Climate Change

Q1 Does the Plan (taken as a whole) include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change?

It is a requirement that climate change considerations must be embedded throughout the plan-making process. Accordingly, the Sustainability Appraisal (SA) ([CSD.004a](#)) has considered the effects of the Local Plan's proposals in relation to climate change via several SA objectives in the SA framework, in particular: objectives 1. carbon emissions and 2. climate resilience. This has helped to ensure that the Local Plan's development has been appropriately informed in relation to potential effects with regard to climate change.

Climate change is one of the overarching threads that weaves throughout the Local Plan's policies, and the Oxford Local Plan 2045 includes a range of policies which respond to the need for addressing it. These policies align with national legislation (e.g. Schedule 7 (15C) of the Levelling Up and Regeneration Act 2023; the Climate Change Act 2008 etc.), as well as national planning policy (e.g. NPPF 2024, Chapter 14) and local climate change commitments.

The key parts of the Local Plan that respond to the topic most directly are Chapters 4 and 5.

- Chapter 4 groups policies together which will help to preserve and strengthen the city's resilience to climate change including ensuring that new development is adapted to future climate hazards.
- Chapter 5 includes policies which seek to radically reduce carbon emissions from new development and mitigate our impacts on climate change, supporting the city's wider transition to net zero carbon, as well as to use natural resources prudently.

In relation to climate change mitigation, the primary source of emissions in the city is the built environment (Section 3 of [BGP.001i](#)). Reducing these emissions is particularly important for supporting the UK's legal commitments to cut carbon dioxide emissions by at least 100% below 1990 levels by 2050 as set out in the Climate Change Act 2008 (as amended). At a local level, this is also important in response to Oxford's climate emergency declaration and linked [2040 net zero carbon target](#). Buildings coming forward under the new Local Plan are expected to be around long after these national and local net zero target dates have passed.

The Local Plan responds to this through Policy R1 which requires new buildings to be net zero carbon in operation - focusing on reducing energy use, using energy efficiently, and matching demand through renewables. The policy seeks to ensure that new buildings are not a net additional source of emissions which would exacerbate climate change, also helping to avoid potentially costly and resource intensive retro-fitting that would be needed at a later date. In addition, the policy is important for supporting other objectives such as fuel poverty (reducing energy bills for occupants) and energy security by promoting micro-generation (which is also a key part of the city's net zero carbon action plan and road map – [RES.010](#)).

Alongside Policy R1, Policy R2 addresses embodied carbon in the construction process, which is the other significant source of carbon dioxide emissions associated with new development. This is a complex topic, heavily influenced by decisions taken at the design stage, so the policy

takes a proactive and preventative approach by setting out a range of principles for proposals to respond to (where relevant to the particular scheme). It also requires larger developments to actively quantify embodied carbon, including reductions secured through the design process. Policy R3, meanwhile, responds to the significant retro-fit burden across the existing built environment by seeking to positively support the ambition of owners of buildings to pursue retro-fitting of their buildings for energy efficiency and climate adaptation reasons. It encourages the 'Whole Building Approach', particularly for traditional/historic buildings which have additional sensitivities in relation to heritage protection which applicants will need to navigate.

Other policies play an important role in supporting climate change mitigation indirectly. For example, those supporting protection of green infrastructure and additional greening help to protect and expand natural carbon sinks in the city, something Policy R6 also supports in its protection for soils, including peat reserves, of which there are several notable deposits in the city. There are also various policies within chapter 7 which support residents in taking active/sustainable transport choices, helping to limit transport emissions.

Of course, the climate is already changing and will continue to change, and that brings a range of risks which Oxford needs to adapt to. The impacts are already affecting us such as through the extensive flooding events in recent years, as well as increasing occurrences of prolonged hot and dry summers such as those earlier this year and in 2022. Research by the County Council indicates that Oxford has some of the most at risk areas in the county and this has implications for health, business, infrastructure, as well as the natural environment.

Chapter 4's policies directly address the principal climate risks facing Oxford, including flooding, overheating (exacerbated by the urban heat island effect), drought, and biodiversity loss, while simultaneously delivering wider benefits for people and the environment. Together they provide a framework that embeds climate adaptation and resilience across the entire development strategy, ensuring that growth contributes positively to climate objectives.

Key to this is safeguarding and enhancing Oxford's green infrastructure network (G1-G3), which provides a range of multi-functional benefits including slowing and storing surface water run off (flood resilience) as well as for shading and cooling the urban environment (resilience to heat). Alongside these, policies supporting new habitat creation and ecological features, as well as protection of a range of ecological sites (G4-G6) help to ensure Oxford's sensitive flora and fauna are able to respond to the changing climate too. The Local Plan also includes policies (G7-G8) which seek to ensure new development comes forward in a way that is appropriate in the context of the extensive flood risk across the city, ensuring future occupants are safe whilst also avoiding exacerbating flood risk for existing residents across Oxford.

However, the most relevant policy which addresses adaptation in response to climate change is Policy G9, which ensures that design of new development is planned through the lens of future climate scenarios (e.g. addressing the potential for overheating, as well as conserving water resources and ensuring flood resilience/resistance). Naturally, G9 crosses over with other policies in the chapter, but it is important in ensuring that climate risk is a key consideration in all aspects of design (whereas these other policies can have wider remits).

Again, other policies elsewhere across the Local Plan also support climate change adaptation. For example, Policy HD10 requires health impact assessments to be undertaken on major developments which also need to factor climate change impacts on health into the assessment process. Policy HD7, and the accompanying design checklist, also draw in considerations of climate change into the design process that applicants will need to follow.

Accordingly, the Plan includes a positively prepared and comprehensive suite of policies which, taken as a whole, are designed to ensure that development and land use contribute to both the mitigation of climate change and adaptation to its impacts, thereby satisfying national policy expectations and supporting Oxford's ambition to become a net zero carbon and climate-resilient city. Climate considerations have also been considered throughout the plan-making process, most directly through the Sustainability Appraisal.

Q2 Where policies relate to climate change mitigation and adaptation, are they sufficiently clear enough to be effective? For example, what is expected of applicants to meet the requirements of Policy G9? (Inspectors' Note: Further sessions will consider the soundness of development management policies.)

As discussed under Q1, the Local Plan includes a range of policies which directly relate to the need for mitigating impacts on climate change and adapting to it. The policies vary in their detail and technical specificity where necessary, however, the City Council considers that they are clear enough to provide for an effective framework which can be applied to a range of sites and development contexts and have been considered for their practicalities with input from Development Management colleagues.

In relation to mitigation, the carbon reduction policies (R1-R3) deal with three different aspects of carbon reduction in the built environment – buildings in operation, the construction process, and the retro-fit of existing buildings. Their requirements will generally need to be responded to through an energy and carbon statement submitted as part of an application and will often need to be supported by additional technical work such as energy modelling or whole life cycle carbon assessment.

Policy R1 continues the trend of requiring new development to take serious action in mitigating impacts on climate change that Policy RE1 in the adopted Local Plan 2036 has done before it. Whilst the general structure and approach of the policy is quite different to the existing policy, reflecting the recommended best practice for net zero carbon policies now being articulated nationally, it is consistent with net zero carbon policies being found sound in Local Plans across the country recently (some examples are touched upon in [RES.001](#)).

The policy sets out a clear framework for all new buildings to follow with requirements including: following the energy hierarchy; meeting certain energy use targets; and matching energy demand through onsite renewables. This framework of targets is important for holding proposals to a high standard of efficiency in order to meet objectives such as minimising carbon emissions associated with operation, reducing occupiers' bills (fuel poverty), supporting energy security through increasing renewables generation. However, the policy also

incorporates necessary flexibility to future-proof it including by being 'technology agnostic', allowing for occupants to select any mix of measures to achieve fabric efficiency levels to meet energy use limits, and any type of renewable energy generation to fit the context of their site.

Policy R2, which addresses embodied carbon, intentionally has less specificity than policy R1, for example, omitting particular targets that applicants will need to meet and instead setting out a number of principles that will need to be responded to where applicable. The more qualitative approach seeks to ensure that applicants directly consider the issues that influence embodied carbon and guide them towards taking actions to limit their emissions where they might not have otherwise, but avoids imposing specific targets/limits which might limit design choices arbitrarily. This recognises that, not only is guidance and understanding about this complex topic still emerging nationally, but the balance between embodied carbon impacts and other considerations is not always clear (e.g. the merits of the longevity of steel versus its higher carbon content compared to a natural material like wood).

The City Council is aware that some types of development will find elements of the policies difficult or impossible, particularly due to limitations of today's technologies. It has sought to make the requirements of the policies as pragmatic and flexible as possible to try to ensure they do not act as blockers to development, without jeopardising their principal aim. Similar to a number of Local Plans elsewhere around the country, Policy R1 clearly sets out an allowance for offsetting as a last resort under criterion e) (*though the approach is framed as energy offsetting rather than the more common carbon offsetting*). The policy also includes elements informed by feedback on previous rounds of consultation, including the development of earlier iterations of the policy through the withdrawn Local Plan 2040, such as the option for non-residential uses, such as R&D/labs/hospitals, to meet higher total energy use (as set out in criterion b of Policy R1), where this can be robustly justified.

It is considered that the key requirements of the policies are clear and achievable, including what happens in scenarios where the standard requirements cannot be met, however, the City Council is in the process of preparing an accompanying Technical Advice Note (TAN) which will provide additional guidance and support applicants in meeting each of the policy's requirements and that will be available upon adoption. TANs are an approach that has been in place throughout the lifetime of the Local Plan 2036 for a range of policy areas, including comparable topics relating to carbon reduction and applicants should be familiar with them.

Turning to the topic of climate adaptation/resilience and Policy G9, arguably, this is one which requires a more multi-faceted response across the design process and Chapter 4's policies make varying contributions to the approach. Yet whilst the policies (as discussed under Q1) can contribute to climate adaptation—such as by providing for green infrastructure protection/provision; ecological enhancements; Sustainable Drainage Systems—this is not their sole focus. To ensure that they successfully contribute to adaptation in addition to other functions, this objective needs to have been considered upfront as part of the design process.

Policy G9 helps to ensure this is done effectively by setting out that applicants should demonstrate that relevant future climate scenarios have informed approaches to mitigating the risk of overheating, flooding (from all relevant sources), and storm extremes for the lifetime of the proposed development. In this way, the policy establishes a clear expectation that

resilience must be considered over the development's entire lifespan so that it is appropriately future-proofed. The policy also sets out that risks need to be considered in relation to occupants; the development itself; and any supporting infrastructure.

The policy clearly sets out through criteria b) to e) the resilience measures that need to be factored into the design process to address these risks and this provides certainty about the types of issues the City Council will want to see addressed in an application. This is a similar approach to what is currently required within Policy RE1 of the Local Plan 2036, which lists a range of principles that applicants need to respond to, but more specifically tailored to climate risks of relevance to Oxford which Policy G9 addresses.

There is naturally some overlap with other policy areas, but the policy is clear that applicants can reference other submission documents they need to prepare where applicable (e.g. their Urban Greening Factor assessment or a site-specific Flood Risk Assessment). The key element of meeting policy G9's requirements is that this supporting information is referenced with a specific consideration of current/future climate risk where it is to be relied upon. This provides a proportionate and practical approach that avoids duplication of evidence and is important for ensuring that the development will be fit to function under future climate conditions as well as those of today.

Climate change mitigation and adaptation are key elements running through the vision and objectives of the new Local Plan and these require strong and clear policies in order to help in their implementation. Whilst it is recognised that the approaches in the new Local Plan represent a step up in requirements for development in Oxford, these have been formulated in a way that makes them as clear and effective as possible, whilst also retaining a level of flexibility and pragmatism which is important for accommodating the range of sites and developments that could come forward over the plan period.

Issue 6 – Public Sector Equality Duty (PSED)

Q1 In what ways does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic, having particular regard to the issue of meeting accommodation needs for Gypsies and Travellers?

The plan has been subject to a full Equalities Impact Assessment ([CSD.002](#)), which is standard practice to meet the Council's duties under the Equality Act 2010. It identifies neutral and positive impacts overall, including through policies on housing, sustainable transport and community facilities, and assigns monitoring responsibilities to the Planning and Regulation team. The scope of the Local Plan and the 20-year time span mean that it will likely have a significant impact on the lives of those who live and work in or visit the city. The Local Plan seeks to address inequalities; however, to achieve its objectives, choices need to be made between competing demands and how limited resources will be allocated. As a result, the policies have been assessed as part of this process for unintended consequences for equality issues.

Reducing inequalities is one of the overarching themes that form the basis for the emerging plan and its objectives, and it thematically informs the development of policies across the entire plan regardless of the topic/subject area, particularly strategic policies relating to housing, employment, access to green spaces and community infrastructure.

The Council has worked collaboratively with neighbouring authorities on the Oxfordshire Gypsy and Traveller, Travelling Showpeople and Boat dwellers Accommodation Assessment ([HEA.006a](#)). This includes taking into account waiting lists and whether there are members of the travelling community living in bricks and mortar. It does not identify any current or forecast need for Gypsy and Traveller and Travelling Showpeople accommodation in Oxford. This Plan therefore does not make any specific site allocations for new sites in Oxford but provides criteria to assess any proposals for new sites that may come forward during the Plan period.

Issue 7 – Other legal requirements

Q1 Where the Local Plan contains a policy that is intended to supersede another policy in the adopted development plan, does it state that fact and identify the superseded policy?

The fifth paragraph of Chapter 1 of the draft OLP2405 says that: This Local Plan for the period 2025-2045 supersedes the Local Plan 2036 and the other relevant parts of the development plan including the Northern Gateway Area Action Plan.

This intended to make it clear that every policy of the Oxford Local Plan 2036 and Northern Gateway Area Action Plan is superseded by the Oxford Local Plan 2045.

However, it is considered that this could be made even more clear through a modification to include proposed Appendix 8 which would remove any doubt. This proposed appendix lists the policies of the Oxford Local Plan 2036 and the Northern Gateway Area Action Plan that are superseded by the Oxford Local Plan 2045, including policies for which there is no direct equivalent in the new plan.

Potential Main Modification:

APPENDIX 8 – SUPERSEDED POLICIES IN THE ADOPTED DEVELOPMENT PLAN

APPENDIX 8.1 - SUPERSEDED POLICIES IN THE OXFORD LOCAL PLAN 2036

The Oxford Local Plan 2036 (and all development plan policies contained therein) is superseded in its entirety by the Oxford Local Plan 2045.

Adopted Local Plan 2036 Policy		Superseded by: Local Plan 2045 Policy	
S1	Presumption in favour of sustainable development	S1	Spatial strategy and presumption in favour of sustainable development
S2	Development contributions	S3	Infrastructure delivery in new development
E1	Employment sites	E1 E2	Employment strategy Warehousing, storage and distribution uses

E2	Teaching and research		Superseded by new plan but with no direct equivalent policy
H1	The scale of new housing provision	H1	Housing requirement
H2	Delivering affordable homes	H2 H3 S4	Delivering affordable homes Affordable housing contributions from other development types Plan viability
H3	Employer-linked affordable housing	H4	Employer-linked affordable housing
H4	Mix of dwelling sizes	H5	Mix of dwelling sizes
H5	Development involving loss of dwellings	H6	Development involving loss of dwellings
H6	Houses in multiple occupation (HMO)	H7	Houses in multiple occupation
H7	Community-led housing and self-build housing	H13	Self-build and custom housebuilding
H8	Provision of new student accommodation	H8	Location of new student accommodation
H9	Linking the delivery of new/redeveloped and refurbished university academic facilities to the delivery of university provided residential accommodation	H9	Linking new academic facilities with the adequate provision of student accommodation
H10	Accessible and adaptable homes	HD11	Accessible and adaptable homes
H11	Older persons and specialist and supported living accommodation	H12	Older persons and other specialist accommodation
H12	Homes for travelling communities	H10	Homes for travelling communities
H13	Homes for boat dwellers	H11	Homes for boat dwellers
H14	Privacy, daylight, and sunlight	HD8	Privacy, daylight and sunlight
H15	Internal space standards	HD9	Internal space standards for residential development
H16	Outdoor amenity space standards	HD10	Outdoor amenity space
RE1	Sustainable design and construction	R1 R2 G9	Net zero buildings in operation Embodied carbon in construction Resilient design and construction
RE2	Efficient use of land	HD2	Making efficient use of land

RE3	Flood risk management	G7	Flood risk and flood risk assessments
RE4	Sustainable and foul drainage, surface and groundwater flow	G8 R5	Sustainable drainage systems (SuDS) Water resources and quality
RE5	Health, wellbeing, and Health Impact Assessments	HD7	Health Impact Assessment
RE6	Air quality	R4	Air Quality Assessments and standards
RE7	Managing the impact of development	R8	Amenity impacts of development
RE8	Noise and vibration	R8	Amenity impacts of development
RE9	Land quality	R7	Land contamination
G1	Protection of Green and Blue Infrastructure network	G1	Protection of Green Infrastructure
G2	Protection of biodiversity and geo-diversity	G6	Protecting Oxford's biodiversity including the ecological network
G3	Green Belt		Superseded by new plan but without direct replacement as national policy approach can be relied on
G4	Allotments and community food growing	G1	Protection of Green Infrastructure
G5	Existing open space, indoor and outdoor sports and recreation facilities	G1	Protection of Green Infrastructure
G6	Residential garden land	G1	Protection of Green Infrastructure
G7	Protection of existing Green Infrastructure features	G1	Protection of Green Infrastructure
G8	New and enhanced Green and Blue Infrastructure network features	G2	Enhancement and provision of new green and blue features
DH1	High quality design and placemaking	S2 HD1	High quality design Principles of high-quality design
DH2	Views and building heights	HD6	Views and building heights
DH3	Designated heritage assets	HD3	Designated heritage assets
DH4	Archaeological remains	HD5	Archaeology
DH5	Local heritage assets	HD4	Non-designated heritage assets
DH6	Shopfronts and signage	C2	Superseded by new plan in general (some aspects in C2: Maintaining vibrant centres)

DH7	External servicing features and stores	HD12	Bin and bike stores and external servicing features
M1	Prioritising walking, cycling, and public transport	C6	Superseded by new plan in general (some aspects in C6: Transport assessments, travel plans and service and delivery plans)
M2	Assessing and managing development	C6	Transport assessments, travel plans and service and delivery plans
M3	Motor vehicle parking	C8	Motor vehicle parking design standards
M4	Provision of electric charging points	C8	Motor vehicle parking design standards
M5	Bicycle parking	C7	Cycle and powered two wheelers parking design standards
V1	Ensuring the vitality of centres	C1	City, district and local centres
V2	Shopping frontages in the city centre	C2	Maintaining vibrant centres
V3	The Covered Market		Superseded by new plan but with no direct equivalent policy
V4	District and local centre shopping frontages	C1	City, district and local centres
V5	Sustainable tourism	E5	Hotel and short stay accommodation
V6	Cultural and social activities	C5	Protection, alteration and provision of cultural and social venues, pubs and visitor attractions
V7	Infrastructure and cultural and community facilities	C3 C4	Protection, alteration and provision of local community facilities Protection, alteration and provision of learning and non-residential institutions
V8	Utilities	S3	Infrastructure delivery in new development
V9	Digital infrastructure	I1	Digital infrastructure to support new development
AOC1	West End and Osney Mead	WEBRAOF	West End and Botley Road Area of Focus
SP1	Sites in the West End	SPCW7 SPCW9	Nuffield sites Oxford Railway Station and

		SPCW10	Becket Street Car Park Oxpens
SP2	Osney Mead	SPCW8	Osney Mead
AOC2	Cowley Centre District Centre		Superseded by new plan; no direct equivalent site
SP3	Cowley Centre	SPS16	Superseded by new plan; no direct equivalent site but includes SPS16: Templars Square
AOC3	Blackbird Leys Area of Change		Superseded by new plan; no direct equivalent site
SP4	Blackbird Leys Central Area		Superseded by new plan; no direct equivalent site
AOC4	East Oxford-Cowley Road District Centre		Superseded by new plan; no direct equivalent site
AOC5	Summertown District Centre		Superseded by new plan; no direct equivalent site
SP5	Summer Fields School Athletics Track		Superseded by new plan; no direct equivalent site
SP6	Diamond Place and Ewert House	SPN1	Diamond Place and Ewert House
AOC6	Headington District Centre		Superseded by new plan; no direct equivalent site
AOC7	Cowley Branch Line	CBLAOF	Cowley Branch Line Area of Focus
SP7	Unipart	SPS17	Unipart
SP8	MINI Plant Oxford	SPS10	MINI Plant Oxford
SP9	The Oxford Science Park (Littlemore & Minchery Farm)	SPS12 SPS13	Oxford Science Park Ozone Leisure Park and Minchery Farmhouse
SP10	Oxford Business Park	SPS2	ARC Oxford
SP11	Sandy Lane Recreation Ground and land to the rear of the retail park	SPS15	Sandy Lane Recreation Ground
SP12	Northfield Hostel		Superseded by new plan; no direct equivalent site
SP13	Edge of playing fields, Oxford Academy		Superseded by new plan; no direct equivalent site
SP14	Kassam Stadium sites	SPS7 SPS11	Kassam Stadium Overflow car park at Kassam Stadium site
SP15	Knights Road		Superseded by new plan; no direct equivalent site

AOC8	Marston Road	MRORAOF	Marston Road and Old Road Area of Focus
SP16	Government buildings and Harcourt House	SPE3	Government Buildings and Harcourt House
SP17	Headington Hill Hall and Clive Booth Student Village		Superseded by new plan; no direct equivalent site
SP18	Land surrounding St Clement's Church	SPE6	Land surrounding St Clement's Church
AOC9	Old Road	MRORAOF	Marston Road and Old Road Area of Focus
SP19	Churchill Hospital site	SPE1	Churchill Hospital
SP20	Nuffield Orthopaedic Centre	SPE10	Nuffield Orthopaedic Centre
SP21	Old Road Campus	MRORAOF	Superseded by new plan; no direct equivalent site but falls within MRORAOF
SP22	Warneford Hospital	SPE18	Warneford Hospital
SP23	Marston Paddock	SPE9	Marston Paddock Extension
SP24	St Frideswide Farm		Superseded by new plan; no direct equivalent site
SP25	Hill View Farm		Superseded by new plan; no direct equivalent site
SP26	Land west of Mill Lane		Superseded by new plan; no direct equivalent site
SP27	Park Farm		Superseded by new plan; no direct equivalent site
SP28	Pear Tree Farm	SPN5	Pear Tree Farm
SP29	Land east of Redbridge Park & Ride	SPS14	Redbridge Paddock
SP30	St Catherine's College land		Superseded by new plan; no direct equivalent site
SP31	Banbury Road University sites	SPCW1	Banbury Road University Sites – Parcel B
SP32	Bertie Place Recreation Ground and land behind Wytham Street	SPS3	Bertie Place Recreation Ground
SP33	Canalside land	SPCW3	Canalside land, Jericho
SP34	Court Place Gardens		Superseded by new plan; no direct equivalent site
SP35	Cowley Marsh Depot	SPS4	Cowley Marsh Depot
SP36	Faculty of Music, St Aldates	SPCW4	Faculty of Music
SP37	Former Barns Road East allotments		Superseded by new plan; no direct equivalent site

SP38	Former Iffley Mead Playing Fields	SPS6	Former Iffley Mead Playing Field
SP39	Grandpont Car Park		Superseded by new plan; no direct equivalent site
SP40	Jesus College Sports Ground	SPE4	Jesus College Sports Area
SP41	John Radcliffe Hospital site	SPE5	John Radcliffe Hospital
SP42	Land at Meadow Lane	SPS8	Land at Meadow Lane
SP43	Lincoln College Sports Ground	SPE7	Lincoln College Sports Ground
SP44	Littlemore Park		Superseded by new plan; no direct equivalent site
SP45	Manor Place	SPCW6	Manor Place
SP46	Manzil Way Resource Centre	SPE8	Manzil Way Resource Centre
SP47	Thornhill Park	SPE16	Thornhill Park (phase 2)
SP48	Old Power Station		Superseded by new plan; no direct equivalent site
SP49	Oriel College land at King Edward Street and High Street		Superseded by new plan; no direct equivalent site
SP50	Oxford Brookes University Marston Road Campus	SPE11	Oxford Brookes Marston Road Campus
SP51	Oxford Stadium		Superseded by new plan; no direct equivalent site
SP52	Oxford University Press Sports Ground	SPN4	Oxford University Press Sports Ground, Jordan Hill
SP53	No. 1 Pullens Lane		Superseded by new plan; no direct equivalent site
SP54	Radcliffe Observatory Quarter		Superseded by new plan; no direct equivalent site
SP55	Ruskin College Campus	SPE13	Ruskin Campus
SP56	Ruskin Field	SPE14	Ruskin Field
SP57	Slade House	SPE15	Slade House
SP58	Summertown House, Aspley Road		Superseded by new plan; no direct equivalent site
SP59	Union Street Car Park	SPE17	Union Street Car Park
SP60	University of Oxford Science Area and Keble Road Triangle		Superseded by new plan; no direct equivalent site
SP61	Valentia Road Site		Superseded by new plan; no direct equivalent site
SP62	West Wellington Square	SPCW12	West Wellington Square
SP63	Bayards Hill Primary School Part Playing Fields		Superseded by new plan; no direct equivalent site

SP64	William Morris Close Sports Ground		Superseded by new plan; no direct equivalent site
------	------------------------------------	--	---

APPENDIX 8.2 - SUPERSEDED POLICIES IN THE NORTHERN GATEWAY AREA ACTION PLAN (AAP)

The Northern Gateway AAP (and all development plan policies therein) is superseded in its entirety by relevant policies the Oxford Local Plan 2045.

Northern Gateway AAP Policy		Superseded by: Local Plan 2045 Policy	
MP1	Model Policy	S1	Spatial strategy and presumption in favour of sustainable development
NG2	Mix of uses	SPN3 SPN5 SPN6	Oxford North Remaining Phases Pear Tree Farm Red Barn Farm
NG3	Employment	SPN3 SPN6 E1	Oxford North Remaining Phases Red Barn Farm Employment strategy
NG4	Sustainable travel	C7 NEOAOF SPN3 SPN5 SPN6	Cycle and powered two wheelers parking design standards Northern Edge of Oxford Area of Focus Oxford North Remaining Phases Pear Tree Farm Red Barn Farm
NG5	Highway access	C6 SPN3 SPN5 SPN6	Transport assessments, travel plans and service and delivery plans Oxford North Remaining Phases Pear Tree Farm Red Barn Farm
NG6	Car parking	C8 SPN5 SPN6	Motor vehicle parking design standards Pear Tree Farm Red Barn Farm
NG7	Design and amenity	SPN3 SPN5 SPN6	Oxford North Remaining Phases Pear Tree Farm Red Barn Farm
NG8	Oxford Meadows SAC	G6 NEOAOF SPN3 SPN5 SPN6	Protecting Oxford's biodiversity including the ecological network Northern Edge of Oxford Area of Focus Oxford North Remaining Phases Pear Tree Farm Red Barn Farm
NG9	Energy and resources	R1 R4	Net zero buildings in operation Air quality assessments and standards

NG10	Phasing and implementation		Superseded by new plan but without direct replacement
NG11	Delivery of infrastructure		Superseded by new plan

Subsequent pages to be re-numbered accordingly