

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

OXFORD LOCAL PLAN 2045

OXFORD CITY COUNCIL

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

Matter 14: Natural Environment

Issue 1 – Green and Blue Features – Policy G2

Q1 Are the requirements in Policy G2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have they been adequately tested to ensure that they are viable and deliverable?

As set out in the 2022 Green Infrastructure (GI) study (GRE.001) and the green infrastructure background paper (BGP.001e), green infrastructure plays an invaluable role in supporting health and wellbeing (including helping to reduce health inequalities), providing climate resilience, hosting and connecting biodiversity, and providing attractive places to live, work, visit, and invest in. It can therefore contribute to various objectives underpinning the new Local Plan's vision. Whilst Policy G1 seeks to protect existing green infrastructure in the city, Policy G2 sets out requirements in relation to the provision of new green features and has a particular focus on ensuring that new or enhanced features have been designed to secure 'multi-functional benefits'.

The approach within Policy G2 responds to the reality that, in Oxford, due to the city's highly constrained nature and extremely limited scope for the creation of new green and blue infrastructure at scale, green infrastructure often needs to work particularly hard in terms of supporting people and the environment. 'Multi-functionality' is therefore especially valuable when thinking about providing new features, but also when looking for ways to enhance existing ones.

This was supported by the findings of the GI study, which assessed a wide selection of open spaces across Oxford, looking particularly at their quality, multi-functionality, and accessibility. It found that while most sites were assessed as being of good or excellent quality, a number of poor-quality sites were identified with common deficiencies including low biodiversity value, poor accessibility, and management of soft landscaping. Additionally, many sites, particularly larger ones were providing for a wide range of benefits, but there were others that were more limited. There were also gaps in access to certain kinds of open space playing particular roles (e.g. allotments or children's play) in areas of the city.

The study highlighted that, as well as the importance of protecting existing spaces in order to preserve the current functional benefits they provide and prevent local deficits in access from worsening, there are opportunities for improving quality of various spaces and improving multi-functionality to maximise their potential benefits within Oxford's constrained setting. Even smaller areas of greenspace could be enhanced to improve quality in various ways, such by incorporating informal, wild areas supporting biodiversity, or additional play features to support play.

In practice, Policy G2 deliberately seeks to be flexible in some of its requirements in order to be effective across many different site contexts whilst also taking into consideration each sites' individual characteristics (as well as its surrounding area). It seeks to drive the provision of high-quality green infrastructure by setting out in criteria a) to j) a number of key functions which applicants should consider when approaching the design process for their site. The policy requires proposals to demonstrate how these functions were considered through the Design and Access Statement and/or in landscape or elevation plans.

The supporting text flags the importance of using local context to inform the types of functions that might be provided. Box 4.1 at Policy G2 gives some examples to guide applicants thinking in terms of trying to respond to existing deficits in particular types of open space or opportunities to enhance them, however, the particular considerations of relevance will differ depending on where the proposal is located and what is proposed. With the policy setting the overarching framework to guide applicant's thinking, the approach of not being too rigid in terms of exactly what is provided allows for proposals to respond to the changing context of the city over the Plan's lifetime, as well as updated studies or needs assessments.

Additionally, the policy outlines some more specific requirements applicable in certain circumstances. These typically respond to particular priorities or sensitivities in Oxford's local context. For example, despite the GI study noting that it will be quite challenging to create new formal areas of open space, the policy sets:

- a requirement for new public open space to be provided on residential sites of 1.5ha and above.
- a requirement for ecological buffer zones to be implemented on sites adjacent to watercourses, which is something that the Environment Agency have strongly supported for the biodiversity benefits.
- clear maintenance and management criteria to secure effective upkeep of functional green and blue features on sites, this is considered to be increasingly important as impacts of climate change can make the establishment of features like trees more challenging and subject to earlier failure without appropriate care.

As is discussed in the background paper (BGP.001e), driving multi-functional, high-quality new green infrastructure is also well aligned with various aspects of national policy including promoting healthy communities; meeting the challenge of climate change; and conserving and enhancing the natural environment. Paragraph 96c) of the NPPF, for example, supports the provision of safe and accessible green infrastructure and criterion a) of Policy G2 notes public access as a function of green and blue features. Meanwhile, paragraph 103 of the NPPF notes the importance of high-quality open spaces for recreation, play and exercise, which supports criterion b) of Policy G2 which seeks to secure health and wellbeing benefits including recreation and play, as well as the separate policy requirement of 10% open space on residential sites of 1.5 hectares and above.

More broadly, various benefits that the policy flags in criteria a) to j) have the potential to contribute to other parts of the NPPF at a variety of scales and in different ways across different site contexts, including, but not limited to:

- paragraph 162 of the NPPF which discusses the need for a 'proactive approach to mitigating and adapting to climate change', with policy criterion e) recognising the role of green and blue features in addressing climate change through benefits like carbon sequestration, reducing flood risk, providing sustainable drainage, reducing overheating and promoting urban cooling.
- paragraph 187d) of the NPPF which discusses providing biodiversity gains and establishing resilient and coherent ecological networks, with criteria c) and d) of Policy G2 acknowledge by stating that green and blue features should, where relevant,

contribute to enhancing biodiversity and strengthening linkage of ecological sites and green infrastructure.

- paragraph 199 discusses identifying opportunities to improve air quality or mitigate impacts such as through green infrastructure provision and enhancement, and criteria j) recognises that green features can provide a role as natural buffers to address air and noise pollution.

The requirements of the policy have been considered at a high level through the Local Plan Viability Assessment (SUP.002). Appendix 1 of the viability report, which contains the policy review, identifies that the requirement for new open space on larger sites is allowed for within assumptions of net developable site areas as a land use issue, so does not need further consideration within the appraisal. This is a standard approach within viability assessment, as developments rarely deliver 100% site coverage, with areas set aside for open space or other facilities. The non-prescriptive nature of other elements of the policy make them harder to viability test at a plan making level, but are considered to be able to be met through good design and normal allowances for external works in relation to soft/hard landscaping associated with a development and not expected to have a significant impact.

In summary, the approach within Policy G2 is considered to be a justified and effective framework for providing new and enhanced green infrastructure across the city. Its requirements are considered to be deliverable and viable and strongly in accordance with various aspects of national policy, and they are essential in helping to meet many of the objectives of the Local Plan 2045 also.

Please note, we have identified several potential modifications to Policy G2 in response to comments from the Environment Agency (COM.008) as follows:

Amendment to bullet two of 'Policy implementation':

The policy sets out requirements for incorporating ecological buffer zones along watercourses and seeks to facilitate opportunities to re-naturalise spaces near watercourses. This could mean thinking about ways to reinstate ~~embankments~~ bank tops by removing artificial materials and 're-wilding them' which can create new spaces for nature and for people as well as other benefits like helping to mitigate flood risk. Ecological buffer zones should be taken from the top of the bank.

Amendment to paragraph titled 'Strengthening linkages between area to enhance network connectivity':

by incorporating linear features like lines of trees/hedges, creating new pockets of green space that can form 'stepping stones' between larger spaces, or taking opportunities to ecologically enhance river corridors and open up and enhance access to rivers and streams including their banks.

Amendment to bullet d) of the Policy:

d) Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with surrounding green infrastructure (e.g. by including lines of trees/hedges and river corridors to support linkages).

Amendment to heading after bullet j) of the Policy:

Opportunities to enhance and protect blue corridors

Issue 2 – Urban Greening Factor – Policy G3

Q1 Is it sufficiently clear what is meant by "an appropriate proportion of natural green surface cover" for the purposes of Policy G3? How will the policy be implemented and how will it be effective?

The policy and supporting text make clear that the objective is for development proposals to integrate natural ground surface cover at a level that is considered suitable by the policy. The plan adopts the surface cover categories, individual weightings/scores and calculation methods recommended in Natural England's Urban Greening Factor (UGF) Standard, which itself is part of Natural England's Green Infrastructure Framework. As the intention is to provide a consistent approach across England and in discussion with Natural England, it was not deemed necessary to amend the weightings further.

We have identified a proposed modification to policy wording to improve phrasing and make requirements more prominent:

An appropriate proportion of natural green surface cover – which may be comprised of both existing and newly installed features – will need to be demonstrated on certain proposals: ~~(as set out below) and evidenced via submission of a completed Urban Greening Factor (UGF) assessment.~~

~~*Applicants are expected to assess and submit the baseline score for the site pre- development, prior to any site clearance, as well as the proposal as-built/post- development. The as-built/post-development score required for development proposals will need to meet the following policy criteria:*~~

Major development: *proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of:*

a) 0.3 for residential or predominantly residential schemes

b) 0.2 for predominantly non-residential schemes

Major development on wholly greenfield sites: *proposals should demonstrate that there would be no reduction in baseline score, unless this can be demonstrated to be technically infeasible, and achieve a minimum score of:*

c) 0.4 for residential or predominantly residential schemes

d) 0.3 for predominantly non-residential schemes

All other forms of development (such as minor development) are encouraged to demonstrate how they have undertaken greening of their site through use of the UGF assessment, though this is not mandatory.

Along with the submitted UGF assessment, all greening features proposed for the development and used in the calculation of the UGF score should be clearly demonstrated on associated landscaping/elevation plans in the application.

Applicants are expected to assess and submit the baseline score for the site pre- development, prior to any site clearance, as well as the proposal as-built/post- development. This is to be evidenced via submission of an Urban Greening Factor (UGF) assessment. The adopted calculation formulae and the factors for various surface cover types are outlined in Appendix 4.1.

Q2 Is it clear to users of the Plan what the submission of a completed Urban Greening Factor assessment would entail? What is the justification for this requirement and is it sufficiently flexible enough to be effective?

The Urban Greening Factor (UGF) has been established by Natural England as one of the five standards within its Green Infrastructure Framework that defines what good green infrastructure 'looks like' and how it can be planned and delivered in a strategic way. The key attribute of UGF as a planning tool is the relative simplicity of use and its versatility when combined with other planning measures to make a direct contribution to the increase in the quality and quantity of green spaces (see Natural England's Urban Greening Factor for England User Guide, January 2023). It is understood that there may be applicants who are not familiar with this tool and so the supporting text and Appendix 4.1 of the plan provide support. All the information required to apply the policy requirements to proposals is provided within the Plan including the methodology and weighting used by the assessment.

The appendix sets out the formula by which the UGF score is calculated, alongside a short explanation of terms and variables. The appendix reiterates G3's policy goals and gives directions on where to obtain the assessment matrix (which will be made available online) and how the results of the assessment are to be presented as part of an application.

A strength of the UGF approach is that it is inherently flexible; it is designed to specify an outcome (in terms of a score) but is not prescriptive about how this is achieved. As noted in the Policy Implementation section: "*Applicants have flexibility in how they meet the minimum conditions in the policy and these could be achieved through a mix of retaining or enhancing existing features, as well as providing new features*". The UGF approach also provides a menu of options for how to achieve the required score as set out in Appendix 4.1. The surface cover types and categories are listed at Appendix 4.1, with their respective weightings and a general description to guide applicants to the most suitable category for site areas in their schemes. Even within this flexibility, Appendix 4.1 is clear that: "*For surface cover types not specified on the list, a suitable approach will be to select the closest match in the description, in discussion with the Council where appropriate*".

Ultimately, the justification for requiring the submission of the completed assessment is to evidence how proposals have met the required targets in the policy.

Q3 Are the requirements set out in Policy G3 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Policy G3 aligns with several national policy objectives. It contributes to the delivery of well-designed places (NPPF 2024 paragraph 135 (b), (f)) by requiring effective and considered integration of new or enhanced natural features as part of well-considered design proposals; as well as the broader delivery of new high quality open spaces that come with their own wider

benefits with respect to nature, wellbeing and climate change mitigation (NPPF 2024 paragraph 103). It also facilitates the promotion of healthy and safe communities, particularly with respect to the creation of safe and accessible green infrastructure, creating shared spaces for interaction and activity (NPPF 2024 paragraph 96).

Sites in Oxford are particularly constrained by a variety of pressures whilst the Local Plan also includes a variety of policies which will put additional demands on the layout of development sites. In light of the development constraints in Oxford and the demands brought about Local Plan policy requirements, it was considered important to include a policy mechanism on the issue of greening, in recognition of the multiple benefits that natural green surface cover can bring. The City Council therefore explored the potential of incorporating Natural England's Greening Factor Standard as a means to secure these benefits in an effective way. Through the SA and consultation processes involved in plan making, the City Council tested options for this inclusion and also any tailoring of the approach which might be necessary to make this tool effective in the Oxford setting.

The range of considered options and the positive and negative consequences of each are outlined in Appendix A of the Green Infrastructure background paper (BGP.001e, pp 31 – 35). The option taken forward incorporates the use of UGF into policy and encourages its use for all developments, however its mandatory use will only be required for a selected category of development, i.e. majors. This approach will enable targeting application of the methodology to where the most benefits may be accrued, specifically major development which are expected to present more opportunities to secure significant betterment in green surface cover for areas of the city where there is a deficit in green infrastructure. A targeted approach is also less likely to be onerous to implement for developers or impact on the viability of schemes.

Additional testing was required to ensure that the recommended targets included in the Natural England Greening Factor Standard (0.4 for residential and 0.3 for non-residential) were appropriate to the Oxford context or if a bespoke set of targets was required. This was done by carrying out high level testing of the framework using the proposed site allocations as subjects. The objective of the testing was to estimate the UGF scores of the sites in their existing situation and involved identifying existing natural features on site, particularly those that are of sufficient quality to contribute to the UGF score and determining a score on the basis of the categories and weighting as contained in the NE framework. This was largely a desktop-based exercise using mapping data to view and estimate areas of ground cover, as well as officers detailed knowledge of the sites. The results were compared against the potential capacity of those sites which were calculated on the basis of their developable area, density typology and other factors to determine what UGF score could be realistically achieved with an appropriate quantum of on site development.

The outcome of this exercise was a decision to reduce targets for major development (0.3 for residential sites and 0.2 for non-residential), except for wholly greenfield sites. For wholly greenfield sites, the policy has higher minimum targets in line with Natural England, reflecting their already green baseline and the more significant potential impacts of redevelopment.

For wholly greenfield sites, as with other sites, policy G3 requires that proposals should not result in a reduction in the baseline score, meaning sites that already exceed the above minimum targets will need to maintain these scores as a minimum (no net loss), such as through enhancement on areas to counteract losses of other features on the site. However, for wholly greenfield sites, there is a mechanism in the policy for applicants to justify where this is

technically unfeasible (which was considered necessary due to these sites already having high baseline score to start with). In such cases, the policy implementation text sets out clearly how applicants will need to demonstrate this, for example, by setting out how they have tested different potential layouts of the site. In practice this is unlikely to involve significant additional work as the design process will likely involve working through a range of potential site layouts, the additional requirement posed by Policy G3 in such cases will simply be a calculation for those options not taken forward.

Policy G3 functions as a placemaking and design policy as much as an environmental one, and is not intended as a replacement for detailed ecological analysis and associated metrics such as DEFRA Biodiversity metric, even though they have complementary aims. Metrics such as BNG are linked to a wider ecological context, which can allow for offsetting and off site contributions in the appropriate circumstances, whereas the intention for UGF is to localise the benefits that come from the onsite establishment of natural features both to the environment and to future occupiers, including climate adaptation, mental and physical health and wellbeing and biodiversity.

The requirements of the policy have been considered through the testing in the Local Plan Viability Study (SUP.002) through a cost uplift for additional greening (green roofs) alongside requirements for Biodiversity Net Gain which will often require onsite habitat enhancements that overlap. Together the requirements for urban greening and BNG are assessed as as resulting in reduction in residual land values of 2 to 4% and are not considered to be significant. Due to the flexibility with how applicants can achieve the UGF, additional costs are also likely to overlap with those associated with typical external landscaping works.

The overall approach for G3 is considered to be most pragmatic for the local circumstances of the Oxford, and it will ensure that green infrastructure provision is appropriately considered in all major development (with an encouragement from the City Council for its application on other types of development). The policy requirements are considered to be justified, effective, and deliverable as they are developed on the basis of testing of real life site conditions and are adjusted to suit the specifics of Oxford. They are written so that they are flexible and not prescriptive, giving room for applicants to select from a wide range of elements with which to build their score, and to engage with council officers to explore appropriate design solutions. Basing the policy approach on a tool designed and promoted by Natural England has additional benefits in terms of its provenance and its familiarity to applicants who may have come across it elsewhere. This also means that Natural England are content with this approach and have not needed to make comments on the proposed policy targets or approach to applying this tool in the Oxford context.

Issue 3 – Biodiversity Net Gain – Policy G4

Q1 What is the justification for the biodiversity net gain requirement in Policy G4? What information is available to demonstrate that the target can be achieved and that it would not undermine development viability?

Policy G4 references the national minimum requirements for 10% Biodiversity Net Gain (BNG) on applicable planning applications and does not seek to exceed or change this.

Whilst there is no expectation on us to justify the target, as this is subject to separate legislation, the justification for referencing it in the policy is primarily about providing clarity for applicants about what is expected, we are aware that other authorities have recently set locally specific targets. It was also considered helpful to set this out clearly upfront as it has relevance to the rest of the policy, which provides Oxford-specific direction for how applicants should preferably deliver BNG, bearing in mind the challengingly constrained local context of the city.

The key role of the policy is in providing additional guidance for how BNG should be implemented in the city, including any offsite delivery so as to ideally secure local benefits as much as possible. Due to Oxford's constrained setting and the constrained nature of many development sites, there is likely to be quite a lot of reliance on offsite BNG provision which can result in benefits being located far away from a site. The hierarchy as set out in the policy therefore provides applicants with a sequence to follow when looking for alternative sites (and before opting for payment towards statutory credits) which seeks to keep offsite BNG provision as local as possible in our context.

In relation to impacts on development viability, it is not within the City Council's gift to reduce the national 10% target, however, the requirement of 10% Biodiversity Net Gain has been factored into the Oxford Local Plan Viability Assessment (SUP.002) alongside other local policy requirements. Para 4.36 details the assumptions behind the increase in construction costs that have informed the testing which have been informed by DEFRA information. The impacts on residual land values are discussed at para 6.44 which identifies a reduction of 2% to 4% for BNG and additional urban greening, which will often overlap, but that this can be more significant on sites where the starting residual land value is very low. The cumulative impact alongside other policies is discussed at paras 6.50 to 6.54. Overall, the impact of BNG is considered to be minimal and does not make sites unviable.

In relation to justification for the policy, the other requirements as set out in G4 also have an important role in helping to embed the Oxfordshire Local Nature Recovery Strategy (LNRS) into the planning process so that applicants consider it at the appropriate stages. This was considered important in helping to meet expectations in relation to having 'regard' to the relevant LNRS as part of the duty to consider how to conserve and enhance biodiversity under Section 40 of the Natural Environment and Rural Communities Act (as amended by the Environment Act 2021). The policy does this in a couple of ways:

- Firstly, by flagging within the hierarchy the most appropriate stages when an applicant should consider offsite locations for BNG provision on land identified for its ecological potential within the Local Nature Recovery Strategy.

- Secondly by setting out more generally that BNG provision (wherever it may be) should prioritise opportunities to deliver measures which align with those identified in the LNRS, particularly where a proposal is located in an area identified in the LNRS (of which there are various locations around the city).

This policy sets clear expectations on the issue of net gain in biodiversity. Even though a significant requirement of the policy is in fact set nationally, it also contains several important elements that apply national policy in the local context, and it helps meet the duty regarding the LNRS. For these reasons, it is considered important and justified to include Policy G4 on net gain in biodiversity.

Issue 4 – Biodiversity, Ecological Enhancements and Ecological Networks – Policies G5 and G6

Q1 Are the requirements set out in Policy G5 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

As set out in section 5 of the biodiversity background paper (BGP.001f), whilst the 10% Biodiversity Net Gain (BNG) requirements of the Environment Act play an important role in supporting biodiversity, they are very specific in how they can be delivered. The requirement is essentially focused on habitat creation (as a proxy for biodiversity) which must be to a certain quantity and quality that conforms with the Statutory Biodiversity Net Gain metric. However, there are a couple of weaknesses in relying on statutory BNG alone if the Local Plan is to be consistent with national policy or able to meet its objectives around supporting and enhancing the natural environment, which are that:

- Due to the constrained nature of many sites in Oxford, 10% BNG will not always be able to be delivered onsite, particularly where the BNG requirement relies on particularly challenging types of units to deliver. Proposals can meet their BNG requirements by delivering offsite, which would ideally be as local as possible in line with Policy G4, however this could still result in limited benefits for the development itself.
- As highlighted in section 3 of BGP.001f, Oxford is home to a variety of notable species identified under Section 41 of the Natural Environment and Rural Communities Act 2006 (i.e. priority species). These particularly special species are under threat from a range of pressures and include, but are not limited to: Hedgehogs, Water voles, Dormice, Swifts and Slow worms. Whilst BNG can support these species, there are often features and interventions which they rely upon that are not recognised/provided for through the Statutory Biodiversity Net Gain metric.

To be consistent with national policy, the City Council was mindful of the requirements of chapter 15 of the NPPF, particularly para 187. This sets out that planning policies should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Criterion d) of that para sets out that this includes incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

On the basis that a reliance on statutory BNG alone is unlikely to be enough to meet the needs of the local species that are recorded in the city, Policy G5 supports and enhances the Local Plan's approach to providing for biodiversity. It identifies a range of onsite enhancements that would be particularly well suited to meeting the needs of Oxford's species and was put together in liaison with the City Council's Ecologist.

The policy is intended to be effective in securing interventions that are most valuable to Oxford's particular ecological context. In drafting the policy, officers sought to provide as much certainty to applicants as possible as to what is expected in terms of onsite provision. The policy sets out clearly how many enhancements they would be expected to deliver, based upon

the size of development, and then refers to Appendix 4.2 of the Local Plan for the list of enhancements to choose from.

There are some enhancements which are mandatory, reflecting the fact that the development process is a key way we can deliver for certain species (e.g. swifts and bats can rely heavily on the resultant buildings for shelter). But the policy otherwise seeks not to be overly prescriptive in how the other enhancements are met, leaving flexibility to choose the most fitting measures from the other pots in the list. It is considered that this is a way of making the requirements as deliverable as possible for applicants, allowing them to respond to the particular conditions and needs of their site.

In terms of viability impact, the Viability Assessment (SUP.002) considered the scope and requirements of all the proposed policies at a high-level as identified in Appendix 1. The process concluded that the requirements of Policy G5 can generally be designed into soft landscaping with little or no additional costs, so it was not considered in further detail. The City Council is therefore of the view that the requirements are both viable and deliverable, particularly due to the general flexibility that is allowed for.

In summary, the requirements of Policy G5 are justified and consistent with national policy and they provide an important supplement to the nationally legislated 10% BNG requirement for applicable planning applications. They are important for helping to ensure some onsite provision for species, particularly priority species, and, whilst some enhancements will be mandatory, there is enough flexibility built into meeting the other required numbers of enhancements to be effectively delivered across a range of sites and development types in the city.

Please note, we have identified several potential modifications to Appendix 4.2 in response to specific comments at Reg 19 stage which could be made to overcome objections:

Amendment to text in second table of Appendix 4.2, under section 'Pot 1:

Mandatory requirement - Household/Minor/Major', as follows: At least one integrated swift brick (preferred)~~box~~ or swift box~~brick~~

Amendment to text in second table of Appendix 4.2, under section 'Pot 1: Mandatory requirement - Minor/Major', as follows:

At least one bird box per dwelling (resi) or per 1000m2 footprint (non-residential), including consideration of building-dependent species (such as integrated swift bricks (preferred) or swift boxes).

Amendment to text in second table of Appendix 4.2, under section 'Pot 1: Mandatory requirement - Minor/Major', as follows:

Where the site includes areas of outdoor space, c~~C~~hoose two of the following: insect hotel, planting for pollinators, night-flowering species

Q2 Is Policy G6 justified, effective and consistent with paragraph 187 of the Framework, which requires planning policies to protect and enhance sites of biodiversity and minimise impacts on biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species?

Policy G6 is consistent with para 187 of the NPPF as well as the rest of chapter 15. It designates and protects a network of ecological sites across the city including the Oxford Meadows Special Area of Conservation (SAC), various Sites of Special Scientific Interest (SSSIs), as well as locally designated Local Wildlife Sites (LWSs), Local Nature Reserves (LNRs) and Oxford City Wildlife Sites (OCWSs). Whilst these sites are also protected as part of the green infrastructure network as core GI (Policy G1), the protections afforded by Policy G6 include additional considerations related to conserving the ecological features for which they have been designated.

In line with para 188 and 192 of the NPPF, the policy establishes a hierarchy of protection, applying the strongest protection for the SAC and SSSIs, reflective of their international/national importance, as well as protection for sites of local importance at the Oxfordshire/county scale (LWSs) and the city scale (OCWSs). The protections are informed by a range of evidence, including the Habitat Regulations Assessment (HRA) (CSD.005), the Source Pathway Receptor Analysis (GRE.006) which looked at potential impact risk pathways to the SSSIs particularly from the allocated sites, as well as the Biodiversity Background Paper (BGP.001f).

The strong protection for these spaces follows the wider Local Plan growth strategy of protecting a network of high-quality green infrastructure, recognising that once these spaces are lost, they are incredibly hard to recreate. This is particularly the case for the ecological network, which also hosts some of the most significant areas of priority habitat, as well as irreplaceable habitat (e.g. lowland fen within the Lye Valley). The additional protection of Policy G6 also recognises that not only can these sites be compromised by land take if development occurs directly on them, but the habitats and species they support can also be adversely effected by development nearby via a range of impact pathways.

Whilst Policy G6 sets an overarching framework of protection for the designated sites which is commensurate which the way they've been designated and regardless of how they could be adversely impacted, it includes some additional detail in relation to ensuring proposals respond to some particular local sensitivities in Oxford arising from the complex relationship some of its sites have with the water environment. This relates both to impacts upon the surface water and/or groundwater as follows:

- The requirements in relation to the SAC respond to the recommendations from the Habitat Regulations Appropriate Assessment relating to mitigating water quantity and quality impacts (CSD.005, in particular sections 7 and 8). Policy G6 helps ensure that, where necessary, proposals which are not already subject to a site allocation with their own specific requirements, take potential impacts on groundwater recharge, flows, or water quality, into account and respond appropriately.

- The requirements in relation to several SSSIs respond to their similar but broader risks from impacts on their hydrological regimes via either groundwater or surface water and these are: Iffley Meadows, New Marston Meadows, and the Lye Valley. The latter of these (Lye Valley) has also been subject to a separate hydrogeological assessment (GRE.018) to help inform planning guidance for applications nearby, which was recently published as a Technical Advice Note. Again, the policy seeks to ensure applicants are aware of these particular sensitivities and that they appropriately respond to them.

Of course, there can also be other informal areas of important habitat and sensitive species outside of the designated sites. Policy G6 therefore also plays an important role in ensuring that proposals appropriately respond to the potential for this occurring within and around their sites through the second paragraph of the policy. This seeks to ensure that the potential for ecological value is considered anywhere in the city and informed by targeted ecological surveys where necessary. It asks that any impacts have been satisfactorily addressed in the design of the development in accordance with the mitigation hierarchy.

In summary, the strong protection afforded to ecological sites across Oxford is considered justified in response to the competing pressures for land in the city and the range of internationally, nationally and locally important sites. The protection is tailored to be as effective as possible based on their particular vulnerabilities and is important for conserving an ecological network in line with national policy. Policy G6 also forms a part of a wider comprehensive approach to protecting biodiversity across the city, alongside the wider GI network which can help to interconnect these sites and support the movement of their flora and fauna. The approach is also essential in helping to contribute to actions around enhancing biodiversity locally as many of these sites act as reserves from which species can spread and diversity into adjacent areas, whilst also offering some of the most obvious locations for delivering ecological improvements to improve their quality in future.

Please note – we have identified a potential modification that could be made to the first bullet point of the 'Policy implementation' section of the policy in response to an objection raised at Reg 19 stage, as follows:

It is vital that existing biodiversity and features of ecological interest which could be impacted by a development are well understood and that impacts are avoided and/or mitigated. This includes features being directly or indirectly impacted on a site as well as those which could be adversely affected by adjacent development either directly or indirectly. …