

West Oxfordshire District Council

Local Plan (Regulation 19) HRA Report

Final report

Prepared by LUC

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West Oxfordshire District Council

Local Plan (Regulation 19) HRA Report

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Chapter 1

Introduction

1.1 LUC has been commissioned by West Oxfordshire District Council to carry out a Habitats Regulations Assessment (HRA) of its Local Plan 2043.

1.2 The purpose of HRA is to determine whether the Local Plan will have likely significant effects on, and if so whether it will have adverse effects on the integrity of, any sites designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), or Ramsar sites; referred to collectively as 'Habitats Sites'.

Background to the Local Plan 2043

1.3 West Oxfordshire District Council's current Local Plan was adopted in September 2018 which set out the overall planning framework for the district from 2011 to 2031.

1.4 The new Local Plan will cover the period up to 2043; and provides new and updated policies to reflect more recent evidence and key priorities including the District Council's declaration of a climate emergency in 2019.

1.5 The Council consulted on its preferred policy options for the Local Plan in summer 2025 and the preferred spatial options in winter 2025.

The requirement to undertake Habitats Regulations Assessment of Development Plans

1.6 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007; the currently applicable version is the Habitats Regulations 2017, as amended. When preparing its development plan, West Oxfordshire District Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf, and this is then reported to and considered by West Oxfordshire District Council as the 'competent authority'. The Council will consider this work and would usually only progress a plan if it considers that the plan will not adversely affect the integrity of any Habitats Site, as defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government's online Planning Practice Guidance (PPG).

1.7 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest

level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017¹ (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex I of the EU Habitats Directive) and species (Annex II).
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive), and for regularly occurring migratory species not listed in Annex I.

1.8 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites² and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.9 Although Ramsar sites do not form part of the new national site network, Government guidance³ states that:

"Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites – wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site."

1.10 Furthermore, the National Planning Policy Framework (NPPF)⁴ and practice guidance⁵ currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

For simplicity, and in line with common usage, this report uses the term '**Habitats Site**' to refer to all types of designated site within the 'National Site Network' and other sites (e.g. Ramsar sites) for which Government guidance requires an HRA.

1.11 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.12 Table 1.1 summarises the stages involved in carrying out a HRA based on various guidance documents^{6,7}. This report presents the proposed methodology of Stage 1: Screening.

¹ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

² The network of protected areas identified by the EU: https://ec.europa.eu/environment/nature/natura2000/index_en.htm

³ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁴ National Planning Policy Framework (NPP) paragraph 1.94, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵ The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document:

<https://www.dtapublications.co.uk/handbook/European>

⁶ UK Government Planning Practice Guidance, available from <https://www.gov.uk/guidance/appropriate-assessment>

⁷ The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>

Table 1.1 Stages in HRA

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	Description of the development plan and confirmation that it is not directly connected with or necessary to the management of Habitats Sites. Identification of potentially affected Habitats Sites and their conservation objectives⁸. Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures⁹.	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (the 'Integrity Test')	Information gathering (development plan and data on Habitats Sites¹⁰). Impact prediction. Evaluation of development plan impacts in view of conservation objectives of Habitats Sites. Where impacts are considered to directly or indirectly affect qualifying features of Habitats Sites, identify how these effects will be avoided or reduced ('mitigation').	Appropriate Assessment report describing the plan, Habitats Site baseline conditions, the adverse effects of the plan on the Habitats Site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.13 In assessing the effects of the Local Plan in accordance with Regulation 105 of the Habitats Regulations (as amended), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). *[These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.]* If Yes –

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. *[This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1.]*

- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the Habitats Site.

1.14 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid, reduce

⁸ Conservation objectives are published by Natural England for SACs and SPAs

⁹ In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

¹⁰ In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: <http://publications.naturalengland.org.uk/category/5458594975711232>

or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the appropriate authority.

1.15 The HRA should be undertaken by the 'competent authority'; in this case West Oxfordshire District Council, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

Case law

1.16 The HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

1.17 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows

1.18 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on Habitats Sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.19 The HRA also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

Article 6(3) ...must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site."

1.20 In undertaking this HRA, LUC has considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of Habitats Sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats

located beyond the boundaries of Habitats Site, but which may be important in supporting the ecological processes of the qualifying features, have also been considered in this HRA.

1.21 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State and London Ashford Airport Ltd* [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

"There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied ... that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice".

1.22 In addition to this, the HRA takes into consideration the 'Wealden' judgment from the CJEU.

1.23 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.24 In light of this judgment, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.25 The HRA also takes into account the *Grace and Sweetman* (July 2018) judgment from the CJEU which stated that:

"there is a distinction to be drawn between protective measures forming part of a project and intended to avoid or reduce any direct adverse effects that may be caused

by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project”.

“As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future”

“A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is “sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area”

- Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are “imperative reasons of overriding public interest”

1.26 The HRA of the Local Plan therefore only consider the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Previous HRA work

1.27 The HRA of the Final Version Pre-Submission Draft Local Plan 2031 was undertaken by URS infrastructure & Environment UK Ltd in 2015. An HRA of the proposed Main Modifications to the Local Plan 2031 was completed by AECOM Infrastructure and Environment UK Ltd in 2016.

1.28 A Reg.18 ‘Preferred Policy Options’ consultation ran from July-August 2025 and was accompanied by an HRA report prepared by LUC (June 2025).

1.29 A second Reg.18 ‘Preferred Spatial Options’ consultation ran from November-December 2025. The HRA Report (November 2025) was updated by LUC to assess the preferred spatial options and published for consultation alongside the plan.

1.30 This current HRA Report assesses the policies and site allocations included in the Regulation 19 West Oxfordshire Local Plan.

Structure of the HRA report

1.31 This chapter has introduced the requirements to undertake the HRA of the West Oxfordshire Local Plan 2043. The remainder of the report is structured as follows:

- Chapter 2: West Oxfordshire Local Plan 2043 summarises the content of the plan that is the subject of this report.
- Chapter 3: Approach to the HRA sets out the methodology followed during the screening and Appropriate Assessment stages of the HRA.
- Chapter 4: HRA Screening describes the findings of the screening stage of the HRA and concludes which impact pathways would be likely to result in significant effects on Habitats Sites.
- Chapter 5: Appropriate Assessment considers whether there will be adverse effects on the integrity of any Habitats Sites, once mitigation has been taken into account.
- Chapter 6: Conclusions and next steps summarises the HRA screening conclusions and describes the next steps to be undertaken.
- Appendix A: Attributes of Habitats Sites assessed lists relevant features of the SACs, SPAs and Ramsar sites.
- Appendix B: HRA Screening sets out the results of the screening stage for each Local Plan policy and site allocation.
- Appendix C: Record of consultation presents comments on previous versions of the HRA and how those have been addressed.

Chapter 2

West Oxfordshire Local Plan 2043

Content of the West Oxfordshire Local Plan 2043

2.1 The West Oxfordshire Local Plan 2043 establishes the vision, objectives, spatial strategy and policy framework for managing growth and development across the district. It allocates land for housing, employment, infrastructure and other forms of development and includes strategic spatial policies, core policies, area strategies and development management policies.

2.2 The Local Plan Preferred Policy Options Paper (June 2025) set out the draft vision and objectives to guide development in West Oxfordshire up to 2041 (now 2043). The Preferred Spatial Options Consultation Paper (October 2025) identified preferred site options, from which the site allocations have been selected.

2.3 The Regulation 19 Draft Local Plan 2043, which is the subject of this report, sets out the Council's proposed development strategy to 2043, including the site allocations and Strategic Locations for Growth to meet housing, employment and infrastructure needs whilst addressing climate change, nature recovery and sustainable transport objectives.

2.4 The Local Plan 2043 will replace the current West Oxfordshire Local Plan 2031, adopted in September 2018, which provides the current planning framework for the district.

2.5 The Local Plan articulates a clear vision for the district:

"In 2043, West Oxfordshire stands as a beacon of sustainable development and community well-being. Our District has embraced a transformative vision, shaping a future that balances environmental stewardship, economic vitality, and social equity. We not only meet the needs of our residents but inspire others to follow our lead in creating a sustainable and inclusive future.

The district is powered entirely by renewable energy sources and innovative green technologies. Energy-efficient buildings, both residential and commercial have become the norm, with retrofitted historic structures showcasing advanced insulation and energy systems. Public transport is carbon-neutral, including electric buses, bike-sharing schemes, and extensive pedestrian zones. Green roofs and vertical gardens are

commonplace, contributing to urban cooling and biodiversity.

Communities are thriving, inclusive, and resilient. Health and well-being are prioritised through extensive green spaces, recreational facilities, and community gardens. Access to high-quality healthcare and mental health services is seamless, with integrated community health hubs providing comprehensive care. Social inclusivity is strengthened by community centres that offer programs for all ages, fostering intergenerational connections and support networks. Streets and public spaces are designed for safety and accessibility, ensuring everyone can participate in community life.

Our natural landscapes and historic buildings are meticulously preserved and enhanced. Conservation efforts ensure that biodiversity is restored, protected and thrives in rural and urban areas with urban spaces integrating nature through parks, green corridors, and wildlife-friendly initiatives. Historic buildings are not only preserved but also adapted for modern use, blending heritage with innovation and carbon neutrality. This harmonious integration of the old and new attracts tourists and enriches the cultural fabric of the district.

Urban and rural areas are vibrant and welcoming. Town centres are pedestrian-friendly, featuring a mix of local shops, cafes, cultural venues, and public art. Smart technologies ensure efficient public services, supported by digital infrastructure. Public transport is efficient, affordable, and well-connected, making it easy for residents to move around the district and beyond.

West Oxfordshire's housing market is inclusive and dynamic. Infrastructure has kept pace with development and a mix of housing types, from single-family homes to co-housing communities offers a diverse range of options and ensures that everyone from young professionals to retirees can find suitable accommodation. New affordable housing mean that all residents have access to safe and comfortable homes. New developments adhere to the highest standards of sustainability, with green building practices ensuring minimal environmental impact.

The economy is robust and diverse, characterised by innovation and sustainability. Local businesses thrive alongside global enterprises, with a strong emphasis on food and green industries, technology, and creative sectors. The district is a hub for green technology startups, research, and development, supported by partnerships with local universities and research institutions. A focus on skills development and lifelong learning ensures the workforce is adaptable and prepared for the future. Farmers markets, artisanal shops, and local producers are integral to the economy, promoting local produce and craftsmanship.

In 2043, West Oxfordshire is not just a place to live, but a thriving, inter-connected community where people

enjoy a high quality of life, economic opportunities abound, and the natural and historic environment is cherished and protected. Together, we have created a future that is sustainable, inclusive, and inspiring for generations to come."

Objectives

2.6 The Local Plan 2043 sets out six draft strategic objectives which help to articulate the vision and guide the overall content of the plan and provide a benchmark against which progress can be measured.

1. Objective 1 - To take local action and tackle the climate and ecological emergency 'head-on' for the benefit of current and future generations.
2. Objective 2 – To foster healthier and happier communities across West Oxfordshire.
3. Objective 3 - To protect, support and enhance the quality and resilience of West Oxfordshire's built, historic and natural environments.
4. Objective 4 – To allow West Oxfordshire's resident communities and businesses to thrive within a network of attractive, vibrant, and well-connected market towns and villages.
5. Objective 5 – To make sure that all residents can meet their housing needs.
6. Objective 6 – To foster a thriving, diverse, and resilient economy in West Oxfordshire, leveraging its strengths and future growth potential.

2.7 The objectives are delivered through the Local Plan's policy framework, which comprises 5 Spatial Policies, 10 Core Policies, 11 Area Strategies and 31 Development Management Policies. Together these establish the overall spatial strategy for the district, guide the distribution of growth, and provide the basis for determining planning applications.

Quantum of development

2.8 The Local Plan 2043 sets out the overall quantum of development through Policy CP2 – Delivering New Homes and Policy CP3 – Economic Growth and Local Prosperity. The Plan identifies a housing requirement of 18,318 dwellings between 2025 and 2043, comprising 16,290 dwellings to meet West Oxfordshire's local housing need and 2,028 dwellings to contribute towards Oxford City's unmet housing need; with a total housing supply of 19,294 dwellings. Housing delivery will be achieved through a range of sources as summarised in Table 2.1

2.9 Policy CP3 sets out the quantum of employment development to be delivered by the plan: 4.5 hectares of Use

Class E employment land (offices, research and development and light industrial uses) and 25 hectares of industrial and logistics land (Use Classes B2 and B8) over the plan period to 2043.

Table 2.1 Sources of housing supply

Source of homes	Net increase
Past completions (2025/26)	582
Large existing commitments (>10 dwellings)	2,665
Small existing commitments (<10 dwellings)	307
Extant Local Plan 2031 allocations	4,375
New Local Plan 2043 allocations	915
Strategic Locations for Growth (SLGs)	8,350
Windfall allowance	2,100
Total	19,294

Sites assessed in this HRA

2.10 The Local Plan identifies a range of site allocations, Strategic Locations for Growth (SLGs) and Areas of Redevelopment Opportunity (AROs) to meet the district's housing, employment and infrastructure requirements to 2043. This HRA assesses the plan's new site allocations and strategic development locations, together with any retained allocations from the adopted Local Plan 2031.

2.11 The Local Plan confirms that a number of allocations from the adopted Local Plan 2031 remain extant and will continue to contribute towards housing delivery over the plan period. These comprise North Witney Strategic Development Area, West Eynsham Strategic Development Area, Salt Cross Garden Village and Woodford Way Car Park, Witney. Other former allocations either have planning permission, are under construction, have been completed, or have been superseded by alternative allocations and are therefore treated as commitments rather than allocations in the Local Plan 2043.

2.12 Table 2.2 sets out the site allocations that have been considered within this HRA; rows that are shaded indicate sites that do not require HRA screening, for example because they have already been completed.

Table 2.2 Local Plan 2031 site allocations and developments with permission; and how they have been considered in the HRA

Site Reference	Site name	Status	Local Plan 2043 position	Comments
WIT1	East Witney SDA	Outline Planning Permission for 450 dwellings	Included in major residential commitments (i.e. not allocated)	HRA Screening not required
WIT2	North Witney SDA	Local Plan 2031 Allocation	Allocation not superseded 1,250 dwellings	Subject to HRA Screening
WIT3	Woodford Way Car Park	Local Plan 2031 Allocation	Allocation not superseded 50 dwellings	Subject to HRA Screening
WIT4	Land West of Minster Lovell	Development Completed	Completed – not allocated	HRA Screening not required
CA1	REEMA North and Central	Full Planning Permission (2025)	Included in major residential commitments (i.e. not allocated)	HRA Screening not required

Site Reference	Site name	Status	Local Plan 2043 position	Comments
CA2	Land at Milestone Road, Carterton	Development Completed	Completed – not allocated	HRA Screening not required
CA3	Land at Swinbrook Road	Development Completed	Completed – not allocated	HRA Screening not required
CN1	East Chipping Norton SDA	Local Plan 2031 Allocation	Refreshed Allocation for 750 dwellings	Subject to HRA Screening
EW1	Salt Cross Garden Village	Local Plan 2031 Allocation /AAP adopted 2026	Allocation not superseded 2,125 dwellings	Subject to HRA Screening
EW2	West Eynsham SDA	Local Plan 2031 Allocation	Allocation not superseded 950 dwellings	Subject to HRA Screening
EW3	Land east of Woodstock	Development Started	Included in major residential commitments (i.e. not allocated)	HRA Screening not required
EW4	Land north of Hill Rise, Woodstock	Outline Permission for 180 dwellings	Included in major residential commitments (i.e. not allocated)	HRA Screening not required
EW5	Land north of Banbury Road, Woodstock	Outline permission for 235 dwellings	Included in major residential commitments (i.e. not allocated)	HRA Screening not required
EW6	Myrtle Farm, Long Hanborough	Local Plan 2031 Allocation	Allocation removed – not allocated	HRA Screening not required
EW7	Olivers Garage	Development Completed	Completed – not allocated	HRA Screening not required
EW8	Former Stanton Harcourt Airfield	Development Completed	Completed – not allocated	HRA Screening not required

2.13 In addition to the Local Plan 2031 allocations that are not superseded, identified in Table 2.2, the Regulation 19 Draft Local Plan 2043 proposes nine new site allocations, eight Strategic Locations for Growth (SLGs) and four Areas of Redevelopment Opportunity (AROs). These sites form a key component of the spatial strategy and have therefore been included within the HRA screening process. Collectively, they are expected to deliver the majority of new housing and

employment development required over the plan period to 2043.

2.14 The site allocations are as follows – all of these have been subject to HRA Screening:

- Policy CA4 – Carterton MOD Housing Area of Redevelopment Opportunity ARO);
- Policy CA5 – Land West of Carterton Strategic Location for Growth (SLG);

- Policy CA6 – Land North of Carterton SLG;
- Policy CA7 – Land North-East of Carterton SLG;
- Policy CA8 – Land East of Brize Norton SLG;
- Policy WIT4 – Land at Welch Way ARO;
- Policy WIT5 – Land South of Witney SLG;
- Policy WIT6 – Land West of Witney SLG;
- Policy WIT7 – Land North of Burford Road, Witney SLG;
- Policy CN3 – Land North of London Road, Chipping Norton SLG;
- Policy BA2 – Land East of Bampton;
- Policy BU3 – Land South of Sheep Street, Burford;
- Policy CH2 – Land at Jeffersons Piece, Charlbury;
- Policy CH3 – Land South of Hydac, Charlbury;
- Policy LH2 – Hanborough Station ARO;
- Policy LH3 – Land West of Hanborough Station;
- Policy RA2 – Enstone Airfield Area of Redevelopment Opportunity (ARO);
- Policy RA3 – Land north of Aston;
- Policy RA4 – Land at Kingham Station;
- Policy RA5 – Land at the Downs Standlake; and
- Policy RA6 – Rousham Road, Tackley.

2.16 Several other neighbourhood plans are currently being prepared.

2.17 There is also an Area Action Plan for Salt Cross Garden Village, which was adopted in February 2026.

2.18 An application for Botley West Solar Farm Nationally Strategic Infrastructure Project (NSIP) has been submitted and is currently at the Decision stage.

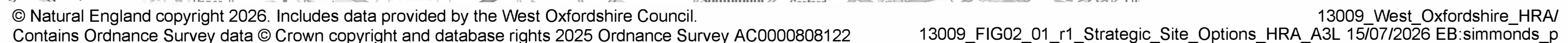
2.19 These plans and projects will be considered in relation to in-combination effects, where relevant.

Other related plans and projects

2.15 West Oxfordshire has a number of neighbourhood plans that must also be taken into account when planning development in the area. Made plans, at the time of writing, are:

- Brize Norton Neighbourhood Plan;
- Cassington Neighbourhood Plan;
- Charlbury Neighbourhood Plan;
- Chipping Norton Neighbourhood Plan;
- Eynsham Neighbourhood Plan;
- Hailey Neighbourhood Plan;
- Milton-under-Wychwood Neighbourhood Plan;
- Shilton Neighbourhood Plan;
- South Leigh Neighbourhood Plan; and
- Woodstock Neighbourhood Plan.

-  West Oxfordshire district boundary
-  Areas of redevelopment opportunity
-  Strategic locations for growth
-  Existing site allocations
-  Other site allocations
-  Special Area of Conservation (SAC)



Chapter 3

Approach to HRA

3.1 This chapter explains the approach taken in the screening of the plan's policies and site allocations; and the Appropriate Assessment of any impact pathways identified as having likely significant effects.

Screening

3.2 HRA Screening of the Local Plan has been undertaken in line with current available guidance and meets the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA and the means by which conclusions have been reached are described below.

3.3 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a Habitats Site, so that they can be eliminated from further consideration in respect of this and other plans;
- Identify all aspects of the plan which would not be likely to have a significant effect on a Habitats Site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require 'Appropriate Assessment'; and
- Identify those aspects of the plan where it is not possible to rule out likely significant effects on a Habitats Site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require Appropriate Assessment.

Identification of Habitats Sites that may be affected by the Plan

3.4 In order to initiate the search of Habitats Sites that could potentially be affected by the Local Plan, it is established practice in HRAs to consider Habitats Sites within the local planning authority areas covered by a Plan, and also within a buffer distance from the boundary of the Plan area.

3.5 A distance of 20km has been used to identify Habitats Sites likely to be affected by impacts relating to development in West Oxfordshire District, in line with the HRA of the adopted Local Plan 2031. In addition to this, consideration has also been given to Habitats Sites connected to the plan area

beyond this distance, for example through hydrological pathways.

3.6 Habitats Sites within 20km of the Plan area are set out below and shown on Figure 3.1. No sites beyond 20km are considered to have potentially significant connectivity to the Plan area.

- Oxford Meadows SAC (partially within east of plan area);
- Cothill Fen SAC (3.2 km to southwest);
- North Meadow & Clattinger Farm SAC (North Meadow component, 13.7km to southeast; Clattinger Farm is >20km away);
- Hackpen Hill SAC (14.3km to south);
- Little Wittenham SAC (16km to southeast); and
- River Lambourn SAC (19.6km to south).

3.7 Further information on each site is set out in Appendix A. The designated features and conservation objectives of the Habitats Sites, together with current pressures and potential threats, have been established using Data Forms for SACs and SPAs¹¹ and Information Sheets for Ramsar Wetlands published on the JNCC website¹², as well as Natural England's Site Improvement Plans¹³, Supplementary Advice Notes¹⁴ and the most recent conservation objectives published on the Natural England website (most were published in 2014)¹⁵. This analysis enables Habitats Site interest features to be identified, along with the features of each Habitats Site which determine site integrity and the specific sensitivities and threats facing the site. This information is then used to inform an assessment of how the potential impacts of the Local Plan may result in likely significant effects on each of the Habitats Sites in question, either alone or in-combination.

Functionally linked land (FLL)

3.8 The term 'functional linkage' can be used to refer to the role or 'function' that land beyond the boundary of a Habitats Site might fulfil in terms of supporting the populations for which the site was designated or classified. Such an area is therefore 'linked' to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.9 Whilst the boundary of a Habitats Site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species.

3.10 Damage or loss of off-site habitat (i.e. land outside Habitats Sites that is functionally linked as it may be used by the qualifying species of a site) is more likely to be an issue for highly mobile species, particularly birds and bats. The potential for FLL within the Plan area has therefore been considered for all Habitats Sites with mobile qualifying species.

3.11 Habitats Sites within 20 km of the plan area that are designated for mobile species that could make use of FLL are identified below. In summary, effects associated with FLL are scoped out of this HRA.

Amphibians

3.12 Little Wittenham SAC supports great crested newts *Triturus cristatus* (GCN) as one of its qualifying features. Great crested newt typically inhabits the land within 500m of their breeding ponds and are known to only travel up to 2km from their breeding ponds. Little Wittenham SAC is c.16km outside the Plan area therefore, assessment of effects on these species is not considered necessary beyond the Habitats Site itself; functionally linked habitats are therefore scoped out in relation to amphibians of Little Wittenham SAC.

Fish

3.13 River Lambourn SAC, which supports bullhead *Cottus gobio* and brook lamprey *Lampetra planeri* lies outside the plan area and is not hydrologically connected to the plan area. Any functionally linked habitat used by these species, if present, is likely to be the Habitats Site itself or up/downstream in connected watercourses. Assessment of effects on these species is not considered necessary beyond the Habitats Site itself; functionally linked habitats are therefore scoped out in relation to fish of River Lambourn SAC.

¹¹ These were obtained from the Joint Nature Conservation Committee and Natural England websites (www.jncc.gov.uk and www.naturalengland.org.uk)

¹² www.jncc.defra.gov.uk

¹³ Natural England is in the process of compiling Site Improvement Plans for all Natura 2000 sites in England as part of the Improvement programme for England's Natura 2000 sites (IPENS).

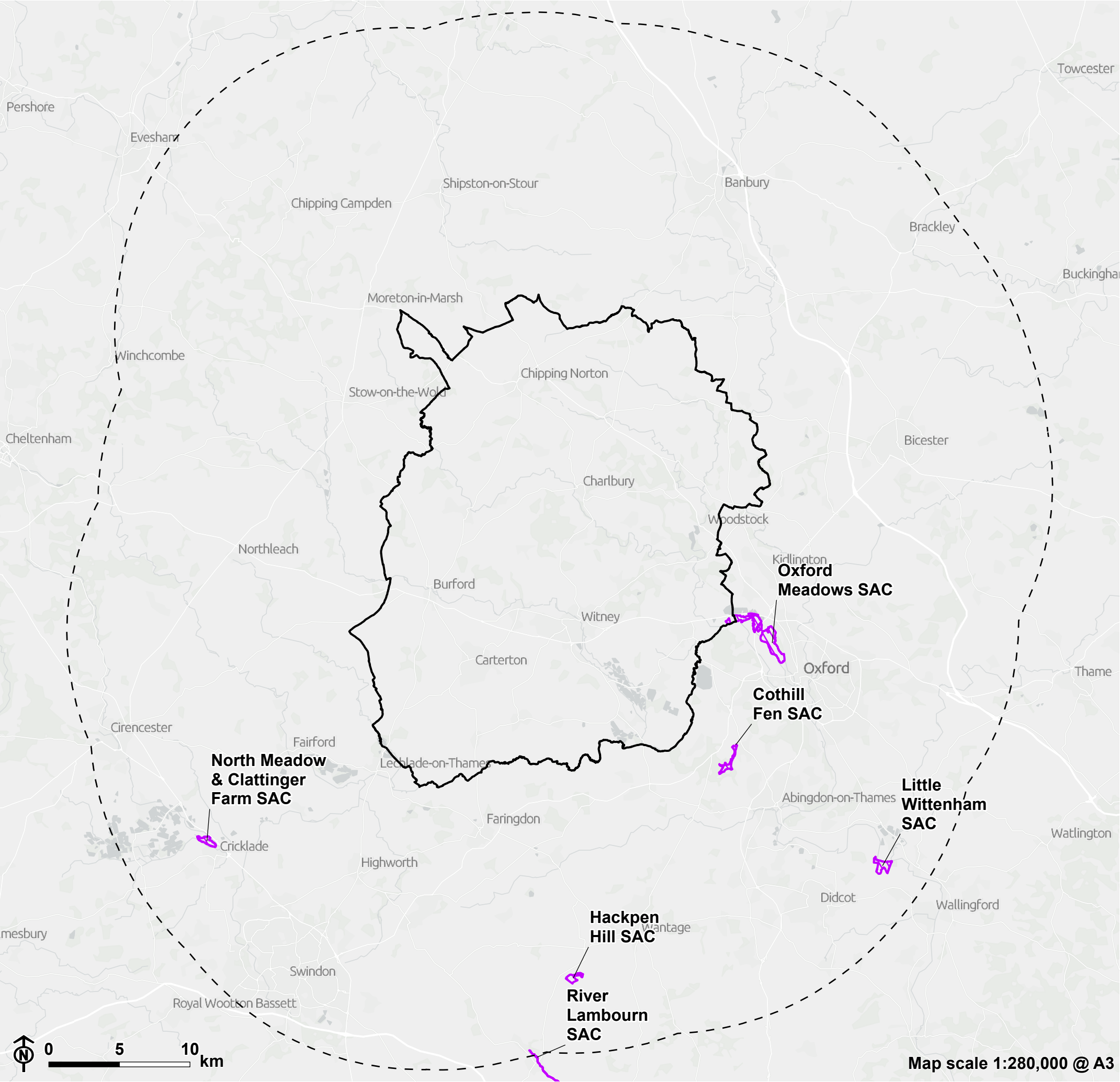
¹⁴ Supplementary Advice Notes, Natural England, (can be found under the relevant Habitats site's Conservation Objectives):

<http://publications.naturalengland.org.uk/category/6490068894089216>

¹⁵

<http://publications.naturalengland.org.uk/category/6490068894089216>

Figure 3.1: Habitats sites within 20km of the plan area



Assessment of 'likely significant effect'

3.14 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017¹⁶ (as amended) (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Plan. The assessment is prepared in order to identify which policies or site allocations would be likely to have a significant effect on Habitats Sites.

3.15 Consideration has been given to the potential for any development proposed to result in significant effects associated with:

- Physical loss of/damage to habitat;
- Non-physical disturbance (noise, vibration and light);
- Air pollution (dust, and vehicle emissions);
- Recreation pressure; and
- Changes to water quality and quantity (e.g. from run-off, wastewater treatment, and abstraction).

3.16 A risk-based approach involving the application of the precautionary principle has been adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the Local Plan would have a significant effect on the integrity of a Habitats Site.

Interpretation of 'likely significant effect'

3.17 Relevant case law helps to interpret when effects should be considered as a likely significant effect (LSE), when carrying out HRA of a land use plan.

3.18 In the Waddenzee case¹⁷, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

3.19 An effect should be considered 'likely', *"if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site"* (para 44). An effect should be considered 'significant', *"if it undermines the conservation objectives"* (para 48). Where a plan or project has an effect on a site *"but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned"* (para 47).

3.20 An opinion delivered to the Court of Justice of the European Union¹⁸ commented that:

"The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

3.21 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those *"which have no appreciable effect on the site"*. In practice such effects could be screened out as having no Likely Significant Effect; they would be 'insignificant'.

3.22 The HRA screening assessment therefore considers whether the Local Plan policies or site allocations could have likely significant effects either alone or in combination.

In-combination effects

3.23 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where *"a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site"*. Therefore, it is necessary to consider whether any impacts identified from the Local Plan may combine with other plans or projects to give rise to significant effects in-combination. Where the Local Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Local Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Local Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would have an adverse effect on integrity of the relevant Habitats Site. Where the screening assessment concludes that there is no impact pathway between development proposed in the Local Plan and the conditions necessary to maintain qualifying features of a Habitats Site, then there will be no in-combination effects to

¹⁶ SI No. 2017/2012

¹⁷ ECJ Case C-127/02 "Waddenzee" Jan 2004.

¹⁸ Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanála 22nd Nov 2012.

assess at the Screening or Appropriate Assessment stage. This approach accords with practice guidance on HRA¹⁹.

3.24 If impact pathways are found to exist for a particular effect but it is not likely to be significant from the Local Plan alone, the in-combination assessment identifies which other plans and programmes could result in the same impact on the same Habitats Site. This focuses on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway would be considered.

3.25 The potential for in-combination impacts therefore focuses on plans prepared by local authorities that overlap with Habitats Sites that are within the scope of this HRA. The findings of any associated HRA work for those plans will be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the Local Plan are also identified and reviewed.

3.26 The online HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans;
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

3.27 The need for in-combination assessment also arises at the Appropriate Assessment stage, as discussed in the Appropriate Assessment section below.

Screening assessment

3.28 A screening matrix has been prepared (see Appendix B), which considers the potential for likely significant effects resulting from each policy or site allocation that may contribute to each type of impact. A 'traffic light' approach is used in the

screening matrix to record the likely impacts of each policy and site allocation on Habitats Sites and their qualifying habitats and species, using the colour categories shown below.

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

3.29 The screening assessment is conducted without taking mitigation (e.g. embedded in policy) into account, in accordance with the 'People over Wind' judgment.

3.30 For some types of impacts, the potential for likely significant effects will be determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the Habitats Sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have to be made, these are clearly set out in **Chapter 4**.

Appropriate Assessment

3.31 Following the screening stage, where likely significant effects of the Local Plan (alone or in-combination) on Habitats Sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an 'Appropriate Assessment' of the implications of the plan for Habitats Sites, in view of their conservation objectives. EC Guidance²⁰ states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of Habitats Sites with respect to their conservation objectives and to their structure and function.

3.32 Unlike the Screening stage, Appropriate Assessment can take into account mitigation, for example as proposed within Local Plan policies.

¹⁹ The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document [online] Available at: <https://www.dtapublications.co.uk/handbook/European>

²⁰ Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001.

Assessing the effects on site integrity

3.33 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. the habitats and species for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that the effects on species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of Habitats Sites also need to be considered. The Appropriate Assessment refers to the information set out in **Appendix A** of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

3.34 A high degree of integrity at a site is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

3.35 A conclusion needs to be reached as to whether or not the Local Plan would adversely affect the integrity of a Habitats Site. Assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the Local Plan policies and/or sites (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.

- Result in fragmentation.

- Result in the loss of key features.²¹

3.36 The conservation objectives for each SAC and SPA (**Appendix A**) are generally to maintain the qualifying features in favourable condition. Natural England does not define conservation objectives for Ramsar sites, but these can often be inferred from those for co-located SAC or SPA features. The Site Improvement Plans and Supplementary Advice for Conservation Objectives for each site provide a high-level overview of the issues (both current and predicted) affecting the condition of the designated features on the site(s) and outline the priority measures required to improve the condition of the features. The Appropriate Assessment draws on these to help to understand what is needed to maintain the integrity of the Habitats Sites.

3.37 For each Habitats Site where an uncertain or likely significant effect is identified in relation to the Local Plan during Screening, the potential impacts are set out and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site. A further in-combination assessment needs to be carried out for any likely significant effects identified where following Appropriate Assessment it is considered that the Local Plan will not on its own adversely affect the integrity of the Habitats Site. This is undertaken in the same way as described above under the Screening stage drawing on information regarding the same types of relevant plans or projects referred to above. Consideration will be given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the site.

²¹ Ibid.

Chapter 4

HRA Screening

4.1 The purpose of HRA Screening is to identify the likely significant effects of the Local Plan's policies and site allocations; and to identify the scope of any Appropriate Assessment work required. The HRA Screening assessment is presented in full within Appendix B and is summarised below.

4.2 As stated, the Screening stage does not take into account mitigation, including any measures that may be embedded within the plan's policies. Mitigation is therefore taken into account in the Appropriate Assessment (Chapter 4).

Screening of policies

4.3 This section summarises the policies screened in, within the HRA Screening of the Local Plan.

4.4 The following policies were screened out, as they will not result in new development or activities. This could be, for example, because they set out design principles; or because the development associated with them is assessed under another policy or has been assessed in relation to the site allocations. There is no impact pathway for:

- Policy SP1 – Settlement Hierarchy;
- Policy SP2 – Spatial Strategy;
- Policy SP3 – Key Development Principles;
- Policy SP4 – Cotswolds National Landscape (CNL);
- Policy CP4 – Delivering infrastructure in step with new developments;
- Policy CP5 – Water Environment;
- Policy CP6 – Design Excellence and Placemaking;
- Policy CP7 – Healthy Place Shaping;
- Policy CP8 – Sustainable and Integrated Transport;
- Policy CP9 – Historic Environment;
- Policy CP10 – Nature Recovery;
- Policy CA1 – Strategic Development Framework for the Carterton Area;
- Policy CA2 – Carterton Town;
- Policy WIT1 – Strategic Development Framework for the Witney Area;

- Policy WIT2 – Witney Town Centre;
- Policy WIT3 – Windrush Valley;
- Policy CN1 – Strategic Development Framework for the Chipping Norton Area;
- Policy CN2 – Chipping Norton Town Centre;
- Policy BA1 – Strategic Development Framework for the Bampton Area;
- Policy BU1 – Strategic Development Framework for the Burford Area;
- Policy BU2 – Burford Town Centre;
- Policy CH1 – Strategic Development Framework for the Charlbury Area;
- Policy EYN1 – Strategic Development Framework for the Eynsham Area;
- Policy LH1 – Strategic Development Framework for the Long Hanborough Area;
- Policy WO1 – Strategic Development Framework for the Woodstock Area;
- Policy WO2 – Woodstock Town Centre;
- Policy WO3 – Blenheim Palace World Heritage Site (WHS);
- Policy RA1 – Strategic Development Framework for the Rural Area;
- Policy DM1 – Green Infrastructure;
- Policy DM2 – Ecological Protection, Biodiversity Net Gain and Nature Recovery;
- Policy DM3 – Conserving and Enhancing Landscape Character through New Development;
- Policy DM5 – Efficient Use of Land for Development;
- Policy DM6 – Trees and Hedgerows and Woodland;
- Policy DM4 – Light Pollution and Dark Skies;
- Policy DM8 – A Healthy Food Environment;
- Policy DM9 – Net Zero Carbon Development;
- Policy DM11 – Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience;
- Policy DM13 – Air Quality and Pollution;
- Policy DM14 – Town Centres;
- Policy DM16 – Active and Healthy Travel;
- Policy DM17 – Parking Standards for New Development (Car and Cycle Parking);

- Policy DM19 – Creating Mixed and Balanced Communities;
- Policy DM20 – Affordable Housing;
- Policy DM21 – Specialist Housing;
- Policy DM22 – Custom and Self-build Housing;
- Policy DM23 – Community-Led Housing; and
- Policy DM31 – Digital Infrastructure and Connectivity.

4.5 The following policies were screened out because, although impact pathways exist, the scale or nature of development is such that there are no likely significant effects (alone or in combination):

- Policy DM10 – Renewable and Low Carbon Energy Development (enables renewable energy development, but Habitats Sites are not sensitive to impacts);
- DM26 – Conversion, Extension and Alteration of Traditional Buildings (enables single building extension, conversion, or changes of use; scale of development will not have likely significant effects); and
- DM25 – Loss, Replacement and Sub-Division of Existing Dwellings (enables single building subdivision, extension and changes of use; scale of development will not have likely significant effects).

4.6 Several of the policies screened out also include measures that may contribute to mitigation for impacts associated with other policies in the plan. These are identified in Appendix B and are considered further in the Appropriate Assessment (Chapter 5).

4.7 The following policies were screened in for further assessment in the Appropriate Assessment, as they have likely significant effects:

- Policy SP5 – A40 Mass Rapid Transit (MRT) Corridor;
- Policy CP1 – Climate Change;
- Policy CP2 – Delivering New Homes;
- Policy CP3 – Supporting Economic Growth and Local Prosperity;
- Policy CA3 – RAF Brize Norton;
- Policy DM7 – Sport, Recreation and Play;
- Policy DM12 – Waste and the Circular Economy (waste management infrastructure);
- Policy DM15 – Community Facilities and Services;
- Policy DM18 – Windfall Housing Development on Unallocated Sites;

- Policy DM24 – Meeting the Needs of Travelling Communities;
- Policy DM27 – Provision and Protection of Land for Employment;
- Policy DM29 – Learning, Skills and Training Opportunities;
- Policy DM28 – Supporting the Rural Economy; and
- Policy DM30 – Sustainable Tourism.

Screening of site allocations

4.8 The following impact types have been screened out in relation to site allocations as there is no impact pathway:

- Physical damage and loss of habitat – no site allocations within or adjacent to Habitats Sites;
- Bird or bat strike – Habitats Sites not designated for birds or bats;
- Non-physical disturbance – no site allocations within 500m of Habitats Site and no qualifying features sensitive to non-physical; and
- Air pollution – dust.

4.9 The following impact types have been screened in as there is an impact pathway that could result in likely significant effects:

- Air pollution from vehicle emissions – all site allocations.
- Air pollution from industrial emissions – RA2, EYN1.
- Water quality / quantity – abstraction: all site allocations.
- Water quality / quantity – wastewater treatment: all site allocations.
- Water quality / quantity – direct pollution EW1, EW2, LH3.
- Recreation pressure – EW1, EW2, LH3.

4.10 Further details of the impact pathways associated with these policies and sites, the Habitats Sites affected, and an explanation of the potential for likely significant effects identified is set out below.

Physical damage and loss of habitat

4.11 Physical damage and loss of habitat can occur when development takes place within or immediately adjacent to a Habitats Site.

4.12 Any development resulting from the Local Plan would take place within the district; therefore, only Habitat Sites within or on the West Oxfordshire District boundary could be

affected by direct physical damage or loss of habitat within the site boundaries.

4.13 The only Habitats Site within the plan area is Oxford Meadows SAC, which is partially within the east of the plan area.

4.14 None of the site allocations are within or immediately adjacent to the SAC.

4.15 The following policies have been screened in because they permit development in unspecified locations, which could in theory be within or adjacent to the SAC:

- Policy CP1 – Climate Change;
- Policy CP2 – Delivering New Homes;
- Policy CP3 – Supporting Economic Growth and Local Prosperity;
- Policy DM7 – Sport, Recreation and Play Policy DM12 - Waste and the Circular Economy;
- Policy DM15 – Community Facilities and Services;
- Policy DM18 – Windfall Housing Development on Unallocated Sites;
- DM24 – Meeting the Needs of Travelling Communities;
- Policy DM27 – Provision and Protection of Land for Employment;
- Policy DM29 – Learning, Skills and Training Opportunities;
- Policy DM28 – Supporting the Rural Economy; and
- Policy DM30 – Sustainable Tourism.

4.16 It is likely that, in practice, development would not be permitted within a Habitats Site; for example, as a result of other policies in the Plan. However, in line with the People Over Wind judgment, mitigation cannot be taken into account at the Screening stage. Impacts on Oxford Meadows SAC have therefore been screened in on a precautionary basis.

There is the potential for likely significant effects associated with physical damage and loss of habitat at Oxford Meadows SAC. These are likely to be significant due to the Local Plan alone. This impact has been screened in.

Bird or bat strike

4.17 Wind turbines have the potential to impact upon bird or bat species. However, although policies within the plan do permit renewable energy development, none of the Habitats

Sites within 20km of the plan area have qualifying bird/bat species.

There are no likely significant effects associated with bird strike from Local Plan development. This impact has been screened out.

Non-physical disturbance

4.18 Noise and vibration effects, e.g. during the construction of new housing or other development, are most likely to disturb bird species and are thus a key consideration with respect to Habitats Sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species.

4.19 Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species; and therefore have an adverse effect on the integrity of Habitats Sites where bats or nocturnal birds are a qualifying feature. Some bird species which are not strictly nocturnal, such as the curlew, and some fish species can also be adversely affected by artificial lighting.

4.20 Visual disturbance will only affect species that respond to visual cues such as fish, birds, reptiles and mammals that depend on sight.

4.21 Odour can arise from development such as waste infrastructure but, similarly, only affects qualifying species sensitive to smell.

4.22 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation with Natural England) that the effects of noise, vibration, visual disturbance, light pollution and odour are capable of causing an adverse effect if development takes place within 500m of a Habitats Site or functionally linked habitats, where there are qualifying features sensitive to these disturbances.

4.23 The only Habitats Site within the plan area, or within 500m of it, is Oxford Meadows SAC. The SAC is designated for habitats and does not have qualifying species that could be affected by noise, vibration, light or visual disturbance.

There are no likely significant effects associated with non-physical disturbance from Local Plan development. This impact has been screened out.

Air pollution

Dust

4.24 Dust can smother habitats, preventing natural processes, and may also lead to effects associated with increased sediment and dust, which can potentially affect the turbidity of aquatic habitats, and can also contribute to nutrient enrichment, which can lead to changes in the rate of vegetative succession and habitat composition.

4.25 The effects of dust are most likely to be significant if development takes place within 500m of a Habitats Site with qualifying features sensitive to these disturbances, such as riparian and wetland habitats, or sites designated for habitats and plant species. This is the distance that, in our experience, provides a robust assessment of effects in plan-level HRA and meets with the agreement of Natural England. Indirect impacts can also occur if dust is produced within 500m of watercourses and affects water quality upstream of a Habitats Site – this is assessed under the water quality section ('direct pollution'), below.

4.26 The only Habitats Site within the plan area, or within 500m of it, is Oxford Meadows SAC.

4.27 None of the site allocations are within 500m of the SAC.

4.28 Policies which permit development in un-specified areas (see paragraph 4.15), could also in theory result in development and therefore dust within 500m of Oxford Meadows SAC. Impacts on Oxford Meadows SAC have therefore been screened in on a precautionary basis.

There is the potential for likely significant effects associated with dust at Oxford Meadows SAC. These are likely to be significant due to the Local Plan alone. This impact has been screened in.

Vehicle emissions

4.29 Air pollution is most likely to affect Habitats Sites where plant, soil and water habitats are the qualifying features. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting pH and nitrogen levels, which can then affect plant health, productivity and species composition.

4.30 Increases in nitrogen deposition, nitrogen oxides (NO_x), ammonia (NH₃) and acid deposition can all arise from vehicle emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.

4.31 The JNCC's 'Guidance on decision making thresholds for air pollution'²² states that *"For the purpose of decision-making, unless local circumstances support a wider zone, plan HRA should take account of the potential effects of traffic emissions on European sites located within 10 km of the plan boundary."*

4.32 Based on the Highways Agency Design Manual for Road and Bridges (DMRB)²³ LA105 Air Quality (which was produced to provide advice regarding the design, assessment and operation of trunk roads including motorways), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.33 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the Screening stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or

- Daily average speed will change by 10 km/hr or more; or
- Peak hour speed will change by 20 km/hr or more; or
- Road alignment will change by 5 m or more.

4.34 Where increases in traffic are possible on roads within 200m of Habitats Sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgment²⁴, the traffic growth considered by the HRA should be based on the effects of development provided for by the Local Plan in combination with other drivers of growth such as development proposed in neighbouring authorities and demographic change.

4.35 The only Habitats Sites within 10km of the plan area and within 200m of a road are listed below:

- Oxford Meadows SAC: Godstow Road, A40 and A34.
- Cothill Fen SAC: Besselsleigh Road and Cothill Road.

4.36 All other Habitats Sites are situated over 10km from the plan area or over 200m from a road and are therefore screened out.

4.37 Traffic modelling has been provided by the Council, which assesses the changes over the plan period due to the Local Plan alone, and in combination with other growth (see Table 4.1).

Table 4.1 Changes in traffic flow (AADT) due to the Local Plan

Habitats Site	Road	Local Plan alone, all vehicles	Local Plan alone, HDVs	Local Plan in combination, all vehicles	Local Plan in combination, HDVs
Cothill Fen SAC	Besselsleigh Rd	175	0	-142	-3
Cothill Fen SAC	Cothill Rd, east Blackhorse Ln	241	3	2,738	16
Oxford Meadows SAC	Godstow Rd, west Home Cl	53	1	618	-13
Oxford Meadows SAC	Godstow Rd, east Rosamund Rd	41	1	1,978	-12
Oxford Meadows SAC	A34	271	15	25,434	137
Oxford Meadows SAC	A40	-488	-44	9,263	281

²² JNCC (2021) Guidance on decision making thresholds for air pollution, <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

²³ Standards for Highways (2019). Design Manual for Roads and Bridges: LA105 Air Quality,

<https://www.standardsforhighways.co.uk/tses/attachments/10191621-07df-44a3-892e-c1d5c7a28d90>

²⁴ Wealden v SSCLG [2017] EWHC 351 (Admin)

4.38 The traffic data indicates that the following roads will experience changes in traffic flow that exceed the DMRB screening criteria, and will require further assessment:

- Cothill Fen SAC - Cothill Road, east of Blackhorse Lane: Changes in traffic flow exceed the DMRB screening threshold for all vehicles, in combination with other growth.
- Oxford Meadows SAC – A34: Changes in traffic flow exceed the DMRB screening threshold for all vehicles, in combination with other growth.

4.39 The following roads will not require further assessment, either because they do not exceed the DMRB screening criteria, or because the Local Plan's contribution to an in-combination effect is not significant:

- Cothill Fen SAC – Besselsleigh Road: Changes in traffic flow are well below DMRB screening thresholds (1,000 AADT all vehicles or 200 AADT for HDVs) and the future in-combination traffic flows are lower than the current baseline.
- Oxford Meadows SAC – Godstow Road, west of Home Close: Changes in traffic flow are well below DMRB screening thresholds.
- Oxford Meadows SAC – Godstow Road, east Rosamund Road: The DMRB screening threshold is exceeded for the Local Plan in combination with other growth, but the Local Plan's contribution to that exceedance is very small (41 AADT).
- Oxford Meadows SAC – A40: The DMRB screening threshold is exceeded for the Local Plan in combination with other growth (for all vehicles and HDVs), but the Local Plan's contribution to this is a reduction in traffic flows.

4.40 The following policies and all of the site allocations could contribute to an increase in traffic or changes in traffic flows; and therefore could contribute to air pollution on the A34 within 200m of Oxford Meadows SAC or Cothill Road within 200m of Cothill Fen SAC:

- Policy SP5 - A40 Mass Rapid Transit (MRT) Corridor;
- Policy CP2 – Delivering New Homes;
- Policy CP3 – Supporting Economic Growth and Local Prosperity;

- Policy DM7 – Sport, Recreation and Play Policy DM15 - Community Facilities and Services;
- Policy DM19 – Creating Mixed and Balanced Communities;
- DM24 – Meeting the Needs of Travelling Communities;
- Policy DM27 – Provision and Protection of Land for Employment;
- Policy DM29 – Learning, Skills and Training Opportunities;
- Policy DM28 – Supporting the Rural Economy; and
- Policy DM30 – Sustainable Tourism.

There is the potential for likely significant effects at Oxford Meadows SAC and Cothill Fen SAC due air pollution from vehicle emissions. These are likely to be significant due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Industrial emissions

4.41 Industrial emissions may arise from various processes that might be used by industrial development; and pollutants could include acid gases, particulates, dioxins and heavy metals.

4.42 The area over which industrial emissions can have an adverse effect depends on the nature of the emissions and factors such as stack height and topography of the surrounding area.

4.43 Environment Agency guidance on environmental permitting²⁵ uses a distance of 10km to screen the potential for effects on Habitats Sites from industrial emissions. Habitats Sites within 10km of the plan area that are sensitive to air pollution are:

- Oxford Meadows SAC (partially within east of plan area); and
- Cothill Fen SAC (3.2 km to southwest).

4.44 Point sources of air pollutants could arise from industrial development associated with the following policy:

- Policy CP3 – Supporting Economic Growth and Local Prosperity, which safeguards employment land.

²⁵ <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#screening-for-protected-conservation-areas>

4.45 Site allocation Policies RA2 Enstone Airfield ARO and EYN1 Strategic Development Framework for the Eynsham Area make some reference to industrial development, but industrial development could also be permitted in other locations, as a result of Policy CP3.

4.46 Industrial emissions are subject to environmental permitting; however, as mitigation cannot be taken into at the Screening stage, industrial emissions are screened in as a precaution. Industrial emissions arising in West Oxfordshire may combine with industrial emissions from other neighbouring authority areas.

There is the potential for likely significant effects at Oxford Meadows SAC and Cothill Fen SAC, due air pollution from industry. These are likely to be significant due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Changes in water quantity or quality

4.47 Changes in water quantity or quality can affect Habitats Sites via the following impact pathways, considered further in the sections below:

- Abstraction: increased demand for water, reducing water quantity or flow in waterbodies.
- Wastewater: increased need for water treatment, resulting in discharge of water into waterbodies and changes in water quality (e.g. nutrient load).
- Pollution from direct run-off, e.g. during construction, reducing water quality.

Increased demand for water (abstraction)

4.48 Mains water is supplied to West Oxfordshire by Thames Water. Thames Water's Water Resource Management Plan 2024²⁶ states that sources of water in Oxfordshire are:

- "North Oxfordshire (Oxford, Banbury, Witney, Farringdon): surface water only – abstraction from the River Thames into Farmoor Reservoir, treated at Farmoor and Swinford WTWs; can produce more water than is needed for local demand, but during drought output is managed to conserve reservoir storage".

4.49 Abstraction from the River Thames also serves areas outside of West Oxfordshire, within the Thames Water region. Farmoor Reservoir is west of Oxford and not hydrologically

linked to any Habitats Site. Oxford Meadows SAC and Little Wittenham SAC are both adjacent to the River Thames but the sites' qualifying features could be affected by abstraction in the following ways:

- Little Wittenham SAC: the great crested newt ponds are on higher ground than the River Thames but may be fed by groundwater. Abstraction that significantly affects groundwater could therefore reduce water levels in the ponds.
- Oxford Meadows SAC: the site's lowland hay meadows and creeping marshwort rely on seasonal flooding from the River Thames. Abstraction could affect this site if water levels in the river are significantly reduced.

4.50 Other Habitats Sites are not hydrologically linked to the Thames and would not be affected by abstraction for water supply.

4.51 All of the Local Plan policies and sites that will result in residential or employment development (i.e. all of the site allocations) could increase demand for water in West Oxfordshire and could potentially impact upon water levels at Oxford Meadows SAC and/or Little Wittenham SAC.

There is the potential for likely significant effects at Oxford Meadows SAC and Little Wittenham SAC due increased demand for water (abstraction). These are likely to be significant due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Increased need for water treatment

4.52 The discharge of wastewater can affect habitats by altering water quality, for example, through nutrient enrichment. Nutrient pollution can cause eutrophication, leading to algal blooms which disrupt normal ecosystem function and cause major changes in the aquatic community, for example by reducing levels of oxygen within the water.

4.53 Wastewater from West Oxfordshire is treated by Thames Water at a number of Wastewater Treatment Works (WwTWs)²⁷, including at Burford (River Windrush), Witney (River Windrush), and Carterton (Shill Brook), which are all on tributaries of the River Thames, upstream of Oxford and therefore Oxford Meadows SAC and Little Wittenham SAC. These sites' qualifying features could be affected by wastewater treatment in the following ways:

²⁶ Thames Water (2024) Water Resources Management Plan, <https://www.thameswater.co.uk/about-us/regulation/water-resources>

²⁷ Southwest Environment Ltd (2025) Thames Water Sewage Treatment Works map, https://southwest-environment.co.uk/further%20info/in%20depth/sewage_works_map/s/thames_water_sewage_treatment_works_location_maps.html

- Little Wittenham SAC: the great crested newt ponds are on higher ground than the River Thames and would only be affected if there was significant pollution in the Thames catchment that affected groundwater.
- Oxford Meadows SAC: the site's lowland hay meadows and creeping marshwort rely on seasonal flooding from the River Thames; therefore, the SAC would directly receive pollutants associated with wastewater treatment (nitrogen/phosphorus) from floodwaters.

4.54 Wastewater associated with development from other neighbouring authorities will also put pressure on wastewater treatment works in the region and increase discharges into the River Thames or its tributaries.

4.55 All of the Local Plan policies and sites that will result in residential or employment development (all of the site allocations), and other large development providing facilities for large numbers of people (e.g. recreational infrastructure or hotels) could increase demand for wastewater treatment, i.e.:

- Policy CP2 – Delivering New Homes;
- Policy CP3 – Supporting Economic Growth and Local Prosperity;
- Policy DM7 – Sport, Recreation and Play;
- Policy DM15 – Community Facilities and Services;
- Policy DM19 – Creating Mixed and Balanced Communities;
- DM24 – Meeting the Needs of Travelling Communities;
- Policy DM27 – Provision and Protection of Land for Employment;
- Policy DM29 – Learning, Skills and Training Opportunities;
- Policy DM28 – Supporting the Rural Economy; and
- Policy DM30 – Sustainable Tourism.

There is the potential for likely significant effects at Oxford Meadows SAC and Little Wittenham SAC due to increased need for water treatment. These are likely to be significant due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Direct pollution (run-off)

4.56 Direct pollution of water can occur due to spills, run-off or dust, during construction and operation. Direct pollution may occur if development is very close to or upstream of a Habitats Site, or watercourses connected to it. In this case, it is only Oxford Meadows SAC and Little Wittenham SAC that

are within the plan area and/or downstream of the plan area. As set out in paragraph 4.53, Little Wittenham SAC would only be affected by substantial changes in groundwater quality as it lies above the River Thames, but Oxford Meadows SAC could be affected by direct input of water from the Thames.

4.57 A distance of 500m has been used to identify site allocations that are 'very close' to watercourses. None of the site allocations are within 500m of Oxford Meadows SAC; however, the following are within 500m of the River Thames or its tributaries, upstream of Oxford Meadows SAC and Little Wittenham SAC:

- EW1 Salt Cross Garden Village, c.450m from River Evenlode.
- EW2 West Eynsham SDA, adjacent to ditches running into River Thames (c.1.2km away).
- LH3 Land West of Hanborough Station, c.130m from River Evenlode.
- LH2 Hanborough Station Area of Redevelopment Opportunity, c.50m from River Evenlode.

4.58 Policy SP5 - A40 Mass Rapid Transit (MRT) Corridor also safeguards land for development, upstream of Oxford Meadows SAC.

4.59 In addition, policies which permit development in unspecified areas (see paragraph 4.15), could also in theory result in development and therefore direct pollution (run-off) within 500m of Oxford Meadows SAC or the River Thames upstream of Oxford Meadows SAC and Little Wittenham SAC. Impacts on Oxford Meadows SAC and Little Wittenham SAC have therefore been screened in on a precautionary basis.

There is the potential for likely significant effects associated with direct pollution (run-off) at Oxford Meadows SAC and Little Wittenham SAC. These are likely to be significant due to the Local Plan alone. This impact has been screened in.

Recreation pressure

4.60 Recreational activities and human presence can result in significant effects on Habitats Sites as a result of erosion and trampling, associated impacts such as fire and vandalism or disturbance to sensitive features, through both terrestrial and water-based forms of recreation.

4.61 Recreation can physically damage habitat as a result of trampling and also through erosion associated with boat wash and terrestrial activities such as the use of vehicles.

4.62 The River Lambourn SAC (19.6km from plan area) is a chalk stream unlikely to be used for significant water-based

recreation. At Little Wittenham SAC (16km from plan area), the qualifying feature is great crested newts, which make use of supporting habitats at the site. However, for other HRAs in Oxfordshire, Natural England has advised²⁸ that great crested newts are not particularly sensitive to recreation pressure; and access is managed by The Earth Trust, to draw visitors away from the most sensitive areas. Recreation pressure at these sites can therefore be screened out.

4.63 However, all of the other Habitats Sites within 20km of the plan area are designated for qualifying habitats that could be affected by recreation pressure.

4.64 The following Local Plan policies and all residential site allocations include provision for new homes or overnight accommodation, which could increase pressure on recreation destinations:

- Policy CP2 – Delivering New Homes;
- Policy DM19 – Creating Mixed and Balanced Communities;
- DM24 – Meeting the Needs of Travelling Communities; and
- Policy DM30 – Sustainable Tourism.

4.65 Each Habitats Site can be thought of as having a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each Habitats Site (and often to specific areas within a Habitats Site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a Habitats Site. This is particularly the case in relation to coastal Habitats Sites, which have the potential to draw large number of visitors from areas much further afield. There are no coastal Habitats Sites within 20km of the plan area.

4.66 In contrast to coastal Habitats Sites, the ZOI for non-coastal Habitats Sites are typically less variable, with visitors travelling from areas more local to the site. Although these sites are unique in their own right, they do not have the same draw as coastal sites and with recreational activities more easily managed and directed to alternative greenspace in the area. Using a precautionary approach and based on ZOIs²⁹

established for other Habitats Sites around the country, a ZOI of 7km has been applied to Habitats Sites where alternative ZOI are not known.

4.67 At North Meadow and Clattinger Farm SAC, work by Cotswold District Council³⁰ has established a zone of influence of 4.2km for year-round visitors, and 9.4km for seasonal visitors who come to see fritillaries at North Meadow. This SAC is 13.7km from the plan area, therefore development in West Oxfordshire will not fall within the zone of influence of the site and recreation pressure can be screened out for this site.

4.68 Hackpen Hill SAC is 14.3km from the plan area; therefore, assuming a generic 7km ZOI in the absence of site specific visitor surveys, recreation pressure can be screened out for this site.

4.69 The two Habitats Sites that have ZOIs within West Oxfordshire are:

- Oxford Meadows SAC: 7km ZOI overlaps with part of the east of the district: Woodstock, Long Hanborough, Freeland, and Eynsham.
- Cothill Fen SAC: 7km ZOI overlaps with a small area in the southeast of the district: Northmoor and parts of Stanton Harcourt and Standlake.

4.70 The following site allocations fall within a ZOI:

- Site allocations within 7km of Oxford Meadows SAC –
 - EW1 Salt Cross Garden Village, 2,200 dwellings;
 - EW2 West Eynsham SDA, 950 dwellings; and
 - LH3 Land West of Hanborough Station , 300 dwellings.
- Sites allocations within 7km of Cothill Fen SAC –
 - None.

4.71 Policies that permit development outside of allocated sites could, however, result in windfall development within either of the ZOIs.

4.72 The Conservation Objectives Supplementary Advice for Cothill Fen SAC³¹ does not identify any sensitivities to visitor pressure (e.g. trampling); and it is considered unlikely that

²⁸ Urban Edge Environmental Consulting (2023) Habitats Regulations Assessment for the South Oxfordshire and Vale of White Horse Joint Local Plan Preliminary Screening Report, <https://democratic.southoxon.gov.uk/documents/s30609/Appendix%206%20-%20Habitats%20Regulations%20Assessment%20Preliminary%20Screening%20Report.pdf>

²⁹ Natural England (2024) RP04518 Edition 1 Compilation and Review of Evidence Leading to SANG and SAMM Provision,

<https://publications.naturalengland.org.uk/publication/6015060338802688>

³⁰ <https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/habitats-regulations-assessment/north-meadow-and-clattinger-farm-sac/>

³¹ 4.73 The Conservation Objectives Supplementary Advice for Cothill Fen SAC, <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012845.pdf>

small scale windfall development would result in significant recreation impacts at Cohill Fen SAC.

4.73 The Conservation Objectives Supplementary Advice for Oxford Meadows SAC³² does refer to impacts on plant species due to trampling, but work undertaken by Oxford City Council³³ for its HRA suggests that the main risk to the SAC's qualifying features is from dog fouling (nutrients), rather than trampling.

There is the potential for likely significant effects at Oxford Meadows SAC due to recreation pressure. These are likely to be significant due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Summary of screening

4.74 Table 4.2 summarises the HRA screening, by impact pathway and Habitats Site. Impact pathways screened in are considered further in the Appropriate Assessment (Chapter 5).

4.75 Non-physical disturbance and bird/bat strike have been screened out for all Habitats Sites.

³² Conservation Objectives Supplementary Advice for Oxford Meadows SAC, <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012845.pdf>

³³ Oxford City Council , Habitats Regulations Assessment Screening Update and Appropriate Assessment, November 2025, <https://mycouncil.oxford.gov.uk/documents/s88262/Appendix%203%20Reg.19%20Habitat%20Regulations%20Assessment.pdf>

Table 4.2 Summary of HRA Screening

Habitats Site	Physical damage and loss of habitat	Air pollution - dust	Air pollution – vehicle emissions	Air pollution – industrial emissions	Water quality/ quantity - abstraction	Water quality/ quantity – wastewater treatment	Water quality/ quantity – direct pollution	Recreation pressure
Oxford Meadows SAC	Screened in (Local Plan alone)	Screened in (Local Plan alone)	Screened in (Local Plan in combination)	Screened in (Local Plan in combination)	Screened in (Local Plan in combination)	Screened in (Local Plan in combination)	Screened in (Local Plan alone)	Screened in (Local Plan in combination)
Cothill Fen SAC	Screened out	Screened out	Screened in (Local Plan in combination)	Screened in (Local Plan in combination)	Screened out	Screened out	Screened out	Screened out
North Meadow & Clattinger Farm SAC	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out
Hackpen Hill SAC	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out
Little Wittenham SAC	Screened out	Screened out	Screened out	Screened out	Screened in (Local Plan in combination)	Screened in (Local Plan in combination)	Screened in (Local Plan alone)	Screened out
River Lambourn SAC	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out	Screened out

Chapter 5

Appropriate Assessment

5.1 The Appropriate Assessment provides a more detailed assessment of the likely significant effects identified during the Screening stage. It considers whether, once mitigation is taken into account, there will be adverse effects on the integrity of a Habitats Site.

5.2 The main policy in the Local Plan that provides mitigation for impacts at Habitats Sites is Policy DM2. This policy states the following (excerpts relevant to the HRA; excluded text marked with [...]):

Policy DM2 - Ecological Protection, Biodiversity Net Gain and Nature Recovery

1. No net loss of biodiversity

All development must achieve no net loss of biodiversity, having regard to the existing (pre development) biodiversity value of the site, and demonstrate biodiversity enhancement to achieve gains where possible.

1. Protection of designated sites

a. Development that would have an adverse effect on the integrity of a Special Area of Conservation (SAC), will not be permitted.

b. Development that is within 500m of Oxford Meadows SAC or within 500m of a river upstream of the SAC (e.g. River Thames, River Evenlode, River Glyme, River Dorn) must demonstrate that measures will be taken to minimise the risk of water pollution (e.g. from spills, drainage or construction dust) during construction and operation, to avoid adverse effects on the SAC.

Application of mitigation hierarchy

a. All development will be expected to minimise ecological impacts in line with the mitigation hierarchy in reducing order of priority:

i. Avoid impacts, e.g. through retention of habitats/features

ii. Reduce through mitigation

iii. Compensate as a last resort only (unless related to impacts on an SAC)

b. Development likely to result in any direct or indirect loss, deterioration or harm to the following ecological features will be refused unless there is a robust justification for a lack of reasonable alternative sites that would result in less or no harm or there are wholly

exceptional reasons justifying the granting of planning permission, and a suitable compensation strategy exists.

- iv. Local Wildlife Sites and Proposed Local Wildlife Sites
- v. Local Nature Reserves
- vi. Priority habitats
- vii. Priority species
- viii. Local Geological Sites
- ix. Important and/or ancient hedges and/or hedgerows
- x. Ancient woodland and/or ancient and/or veteran trees; and/or
- xi. Rivers, streams and tributaries.

[...]

6. Ecological Mitigation and Compensation

a. Where the loss of ecological features cannot be prevented or adequately mitigated, appropriate compensation measures will be sought to offset the loss by contributing to appropriate local nature recovery projects to achieve an overall gain in biodiversity.

b. Measures proposed to mitigate adverse ecological impacts to meet requirements for compensation above will be given weight proportionate to their likelihood of success. Where reasonable doubt exists as to the effectiveness of any such measures, weight afforded to those measures will be significantly reduced.

c. Developers must consider using the NatureSpace Priority Species Scheme where impacts covered cannot be fully mitigated or compensated onsite for the species specifically covered by the scheme.

[...]

5.3 A number of other policies also provide safeguards that are relevant to specific impact pathways. These are identified in the sections below.

Physical damage and loss of habitat

5.4 The HRA Screening identified potential significant effects related to the loss of habitat at Oxford Meadows SAC. None of the site allocations are within or immediately adjacent to the SAC. However, some of the plan's policies permit development in unspecified locations (see paragraph 4.15), which could in theory be within or adjacent to the SAC:

5.5 Policy DM2 Ecological Protection, Biodiversity Net Gain and Nature Recovery provides general protection for Habitats Sites and ensures that development that would have an adverse effect on a SAC would not be permitted. This would prevent development from taking place within or immediately adjacent to the SAC.

5.6 There will be no adverse effects on the integrity of Oxford Meadows SAC, due to physical damage and loss of habitat.

Dust

5.7 The HRA Screening identified potential significant effects related to the creation of dust within 500m of Oxford Meadows SAC. None of the site allocations are within 500m of the SAC. However, policies which permit development in un-specified areas (see paragraph 4.15), could in theory result in development and therefore dust within 500m of Oxford Meadows SAC.

5.8 In addition to the over-arching protection for biodiversity in Policy DM2, Policy DM13 Air Quality and Pollution provides the following additional safeguards:

Policy DM13 - Air Quality and Pollution

1. Development proposals that individually or cumulatively lead to a material deterioration in air quality will only be permitted when they can demonstrate how air quality impacts will be mitigated

2. An Air Quality Impact Assessment (AQIA) will be required for:

a. All major development proposals.

b. Any development likely to result in a significant increase in vehicle traffic or emissions (e.g. from heating, industrial uses).

c. Any development that could impact an AQMA.

d. Proposals that form part of a larger cumulative development likely to impact local or strategic air quality levels.

3. AQIAs must assess the potential impacts on local air quality during both construction and operation, taking into account cumulative effects with other planned or existing developments. They should model pollutant levels where appropriate and evaluate impacts on human health and ecological receptors.

a. Where an AQIA identifies likely significant adverse impacts on air quality, appropriate and proportionate mitigation must be secured through the planning process. Measures may include, but are not limited to:

i. Sustainable transport infrastructure (e.g. walking, cycling, EV charging).

ii. Reduced car dependency and traffic management schemes.

iii. Low-emission building design, heating systems and energy sources.

iv. Landscaping and green infrastructure to support pollutant absorption.

v. Off-site mitigation contributions, where on-site measures are insufficient.

Construction Emissions

4. All major development must incorporate Construction Environmental Management Plans (CEMP) that include:

- a. Dust suppression and control measures.
- b. Monitoring of particulate matter.
- c. Limiting construction vehicle emissions and on-site machinery impacts.
- d. Protocols for responding to air quality breaches during works.

5. Particular care must be taken in air quality sensitive areas (the AQMAs and within 500m of the Oxford Meadows SAC), where enhanced construction management and controls may be required.

Monitoring and Management

6. Development affecting AQMAs may be required to contribute to:

- a. Air quality monitoring during and post-construction.
- b. The preparation of Air Quality Management Plans (AQMPs).
- c. Ongoing compliance reviews and adaptive mitigation where thresholds are at risk of being exceeded.

5.9 This is considered sufficient to minimise and avoid adverse effects from dust.

5.10 There will be no adverse effects on the integrity of Oxford Meadows SAC, due to dust.

Vehicle emissions

5.11 The HRA Screening identified likely significant effects at Oxford Meadows SAC and Cothill Fen SAC due air pollution from vehicle emissions, due to the Local Plan in combination with other plans/projects. Until the air quality assessment is completed, it is not known whether mitigation will be required, additional to the wording already in Policy DM13 (if clarified as recommended in Chapter 6). However, some of the policies in the Local Plan are intended to reduce trips by car and may contribute towards a reduction in traffic:

- Policy CP8 Sustainable and Integrated Transport: requires developments to prioritise sustainable travel

modes and provide public transport and electric vehicle infrastructure.

- Policy DM16 Active and Healthy Travel: requires developments to safeguard existing active travel networks and provide new and enhanced networks e.g. walking and cycling paths and amenities.
- Policy DM17 Parking Standards for New Development (Car and Cycle Parking): sets standards for parking that reduce parking where there is good access to sustainable transport and public services.

5.12 Adverse effects on the integrity of Oxford Meadows SAC are uncertain. **In order to conclude no adverse effects on integrity, it will be necessary to undertake air quality assessment and assess the effect of the predicted change in pollutant levels on the SAC's qualifying features.**

Further information on the next steps is set out in Chapter 6. If mitigation is required, this will need to be agreed and secured (e.g. through policy wording), prior to the adoption of the Local Plan.

Industrial emissions

5.13 The HRA Screening identified potential significant effects related to industrial emissions from industrial development associated with the following policy:

- CP3 Supporting Economic Growth and Local Prosperity.

5.14 Site allocation Policies RA2 Enstone Airfield ARO and EYN1 Strategic Development Framework for the Eynsham Area make some reference to industrial development, but industry could also be permitted in other locations, as a result of Policy CP3. Industrial emissions could in theory affect the qualifying habitats at Oxford Meadows SAC or Cothill Fen SAC.

5.15 All industrial emissions are subject to control under the Industrial Emissions Directive (Directive 2010/75/EU), transposed into law in England by The Environmental Permitting Regulations (England and Wales) 2010 (as amended) and would require either a Part A(1) or A(2) environmental permit. Permits are issued by the Environment Agency. Permit applicants are required to undertake screening to identify European sites within 10 kilometres, calculate the predicted environmental concentration of each substance released to air and compare these with environmental standards, then take action to reduce emissions levels, where required³⁴

³⁴ <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#screening-for-protected-conservation-areas>

5.16 Control of industrial emissions is outside the remit of the Local Plan and is managed through emissions permitting, which will ensure that adverse effects on integrity are avoided. No additional safeguards are required in Local Plan policy to avoid adverse effects on the integrity of Habitats Sites.

Abstraction and wastewater treatment

5.17 The HRA Screening identified likely significant effects at Oxford Meadows SAC and Little Wittenham SAC due to increased need for water treatment and abstraction, due to the Local Plan in combination with other plans/projects. Of these, it is the impacts of wastewater on Oxford Meadows SAC that is the most likely to be significant, as its qualifying features rely on seasonal flooding from the River Thames and would receive pollutants associated with wastewater treatment, in floodwaters. Abstraction would only affect Oxford Meadows SAC if it substantially reduced flows in the River Thames; and Little Wittenham SAC would only be impacted by substantial changes in groundwater quality or levels.

5.18 Water abstraction and the discharge of treated wastewater into waterbodies is controlled by environmental permitting by the Environment Agency; and water companies have a duty to deliver services while meeting their obligations under the Habitats Regulations and Water Framework Directive. To ensure that the infrastructure required to deliver water supply and wastewater treatment meet the expected demand (e.g. from the Local Plan and other development in the region), water companies produce Water Resources Management Plans and Drainage and Wastewater Management Plans. The status of these are:

- Water Resources Management Plan: WRMP24 published in 2024.
- Drainage and Wastewater Management Plan: DWMP23 published in 2023 and now being updated; DWMP28 is currently in draft.

5.19 The WRMPs and DWMPs were produced before the location and quantum of development within the Local Plan was confirmed. The Council therefore needs to confirm that the development proposed to come forward in the Local Plan, and its phasing, can be accommodated by the water companies; and, therefore, that there will be no adverse effects on Habitats Sites (which could arise if the capacity was exceeded). The Council has commissioned a Water Cycle Study (WCS), which identifies existing infrastructure capacity.

5.20 The WCS Scoping Study³⁵ identified potential shortfalls in water supply that would require:

- Thames Water updating the WRMP to reflect the latest proposed housing figures from West Oxfordshire.
- Review of proposed site allocations by Thames Water, to provide details on where water supply upgrades will be required to manage future development.

5.21 The WCS Detailed Report (July 2026, currently unpublished) concludes the following in relation to wastewater treatment:

- At six of the district's 13 sewage treatment works (STWs) (Bledington, Burford, Cassington, Charlbury, Enstone, and Middle Barton), there is sufficient capacity for the Local Plan's proposed development – based on the WCS conclusion, the HRA can conclude there will be no impact on Habitats Sites.
- A four STWs (Bampton, Carterton, Chipping Norton, and Witney), capacity would be exceeded by up to 25%, due to the Local Plan; however, infrastructure upgrades are planned at these treatment works, at the start of the plan period – based on the WCS conclusion, the HRA can conclude there will be no impact on Habitats Sites.
- At three STWs (Church Hanborough, Standlake, and Tackley), capacity would be exceeded by more than 25%, due to the Local Plan. Upgrades are planned at Church Hanborough, but the timing is uncertain – based on the WCS conclusion, the HRA considers that there is a potential impact on Habitats Sites. Church Hanborough STW is on the River Evenlode and Standlake on the River Windrush (both upstream of Oxford Meadows SAC and Little Wittenham SAC); and Tackley is on the River Cherwell (upstream of Oxford Meadows SAC). The WCS indicates that water quality due to these STWs will remain broadly the same, post-development, as the current baseline; with the exception of Standlake, which will cause a reduction in water quality of more than 10% due to phosphorus.

5.22 The WCS states that Thames Water will need to assess growth demands as part of its wastewater asset planning activities and feedback to West Oxfordshire District Council if concerns arise. Thames Water will also need to secure relevant planning permissions to upgrade its wastewater facilities. Thames Water should work proactively with the EA as the principal environmental regulator for the water industry and Oxfordshire County Council as the waste planning authority to do this.

5.23 The WCS will be shared with Thames Water for comment, and agreements between the Council and water companies will be documented in Statements of Common

³⁵ https://www.westoxon.gov.uk/media/oxuf3hnd/whs10174-wodc-scoping-water-cycle-study_v2-0.pdf

Ground, to ensure that the phasing of development aligns with infrastructure provision.

5.24 Policy CP5 Water environment is the main policy in the plan that aims to reduce the demand for water infrastructure and ensure that required infrastructure is delivered prior to development:

Policy CP5 Water environment

[...]

3. Water Supply and Efficiency

a. All development must provide necessary water supply infrastructure and ensure water supply security. Any off-site upgrades to water infrastructure needed to meet this requirement must be delivered prior to occupation.

b. All development must promote water conservation;

i. Proposals for new dwellings must demonstrate how they can meet a target of no more than 100 litres per person per day, through water efficient fixtures, recycling systems, and greywater or rainwater reuse.

ii. Commercial development must achieve at least the BREEAM “excellent” standard for the “Wat 01” water category or equivalent.

4. Wastewater Management and Water Quality

a. Development that increases wastewater discharges must be supported by necessary wastewater infrastructure and ensure that wastewater is managed sustainably, without adverse ecological impact on water bodies or ecosystems.

b. Proposals for development must demonstrate that appropriate sewerage and wastewater infrastructure, treatment and discharge arrangements, water quality safeguards, and pollution prevention measures will be provided in accordance with Policy CP4.

5. Connection to Public Sewers and Non-Mains Systems

a. In accordance with national guidance, all development must prioritise connection to the public foul sewer. Only where it can be robustly demonstrated that it is not feasible or reasonable to do so, will an alternative private treatment arrangement be considered, subject to Environment Agency support.

b. Any proposals for non-mains systems must provide sufficient information to demonstrate environmental safety, operational arrangements, and compliance with permits and Building Regulations where they would have a land use impact.

6. Grampian Conditions and Phasing

a. Where evidence of insufficient water supply or foul water capacity exists, the Council will impose Grampian-

style conditions to ensure that delivery of necessary infrastructure is phased in accordance with Policy CP4.

[...]

5.25 Policy CP4 Delivering infrastructure in step with new development also states that:

“a. Development proposals must be supported by timely provision of new or enhanced infrastructure necessary to meet the needs arising from the development, due to its individual or cumulative impact, including, but not limited to, energy, transport, utilities, education, healthcare, open space and community facilities.

b. Necessary infrastructure must be delivered in step with the phasing of development to ensure it is available when required by future occupants or users.

c. Major development proposals must be supported by a site-specific Infrastructure Delivery Plan (IDP) which complements the Council’s district-wide IDP.”

5.26 The safeguards within these policies are sufficient to ensure that development would not be permitted, where there is insufficient water supply or wastewater infrastructure capacity; and the policy ensures that demand for infrastructure is minimised. There will be no adverse effect on the integrity of Oxford Meadows SAC or Little Wittenham SAC, due to wastewater treatment or abstraction.

5.27 The Council will also continue to work with Thames Water to ensure that the required water infrastructure is provided in step with development (see Chapter 6)

Direct water pollution

5.28 The HRA Screening identified likely significant effects due to direct water pollution associated with development within 500m of Oxford Meadows SAC or within 500m of the River Thames or its tributaries, upstream of Oxford Meadows SAC and Little Wittenham SAC. As with wastewater impacts, Oxford Meadows SAC is more likely to be significantly affected by Little Wittenham SAC. The following are within 500m of the River Thames or its tributaries:

- EW1 Salt Cross Garden Village, c.450m from River Evenlode.
- EW2 West Eynsham SDA, adjacent to ditches running into River Thames (c.1.2km away).
- LH3 Land South West of Hanborough Station, c.130m from River Evenlode.
- LH2 Hanborough Station Area of Redevelopment Opportunity, c.50m from River Evenlode.

5.29 None of the site allocations are within 500m of Oxford Meadows SAC, but policies which permit development in unspecified areas (see paragraph 4.15), could in theory result in development and therefore direct pollution (run-off) within 500m of Oxford Meadows SAC or the River Thames upstream of Oxford Meadows SAC and Little Wittenham SAC.

5.30 In addition to the over-arching protection for biodiversity in Policy DM2 (subject to the recommended edits being incorporated), Policy CP5 Water environment provides safeguards that are specific to direct water pollution:

Policy CP5 Water environment

[...]

2. Nature Recovery

Development proposals affecting, adjacent to, or with the potential to influence watercourses, waterbodies and their associated riparian environments must, where relevant and proportionate to the type, scale and location of the proposal:

- a. Protect and, where possible, enhance the ecological value, natural functioning and connectivity of watercourses, waterbodies and associated habitats.
- b. Conserve and support the recovery of aquatic and riparian habitats, species and ecological networks, including through the restoration of natural river processes and habitat complexity where opportunities arise.
- c. Avoid or minimise adverse impacts on the ecological, hydrological and geomorphological functioning of the water environment and demonstrate that any necessary infrastructure or interventions including culverts and artificial lighting, have been designed sensitively to support nature recovery in accordance with best practice guidance.
- d. Contribute positively towards nature recovery and ecological connectivity in accordance with Policy CP10.

[...]

5.31 Policy DM13 Air Quality and Pollution also provides safeguards specific to dust (which could indirectly affect water quality).

5.32 Policy CP5 is sufficient to avoid adverse effects on integrity, due to direct water pollution, at Oxford Meadows SAC and Little Wittenham SAC.

Recreation pressure

5.33 The HRA Screening identified likely significant effects at Oxford Meadows SAC from recreation pressure (likely to be related more to fouling than trampling), due to the Local Plan in combination with other plans/projects. These impacts would arise due to residential site allocations within the 7km ZOI for the SAC (EW1 Salt Cross Garden Village, 2,200 dwellings; EW2 West Eynsham SDA, 950 dwellings; and LH3 Land West of Hanborough Station, 300 dwellings – a total of 3,450 homes); and windfall development.

5.34 The following Local Plan policies set out overarching requirements for open/green space provision, which can help to mitigate recreation pressure at the SAC:

- Policy CP4 Delivering infrastructure in step with new developments: “a. Development proposals must be supported by timely provision of new or enhanced infrastructure necessary to meet the needs arising from the development, due to its individual or cumulative impact, including, but not limited to, energy, transport, utilities, education, healthcare, open space and community facilities. b. Necessary infrastructure must be delivered in step with the phasing of development to ensure it is available when required by future occupants or users. [...]”
- Policy DM1 Green infrastructure: requires developments to “protect existing accessible open spaces from unnecessary loss of fragmentation” and to “provide new multifunctional green infrastructure that is safe, inclusive and accessible”. Also “all strategic development sites of more than 300 homes, around 50% of the site area (including private garden space) should contribute to the overall green infrastructure network. The exact proportion of green infrastructure must be informed by site-specific constraints, masterplanning and viability considerations, provided the overall function, quality and connectivity of the network are not undermined.”
- Policy DM7 Sport, recreation and play: requires development to safeguard existing provision and provide new open space in line with the West Oxfordshire Open Space Study.

5.35 The following site allocations within the ZOI also include the following requirements for open/green space:

- EW1 Salt Cross Garden Village: an Area Action Plan (adopted February 2026³⁶) has been produced for this site, which sets out the requirement for accessible green space. A minimum of 39.89ha of green space will be

³⁶ <https://www.westoxon.gov.uk/media/5kwjr10z/salt-cross-area-action-plan-february-2026.pdf>

provided, including 17.57ha of amenity or natural/semi natural greenspace.

- EW2 West Eynsham SDA: the masterplan³⁷ for this site was approved by the Council in 2022 and includes c.40ha of natural/semi natural and amenity green space.
- Policy LH3 Land West of Hanborough Station: states that “Public open space, children’s play space and informal recreation shall be provided on-site, with long-term management arrangements secured.”

5.36 The work by Oxford City Council for its HRA (see paragraph 4.72) suggests that it is dog walking that is the main risk to the SAC’s qualifying features. The provision of on-site greenspace near to people’s homes is likely to provide local dog walking opportunities.

5.37 The provision of accessible green space within the three site allocations within 7km of the SAC, along with the general requirements in Policies CP4, DM1 and DM7 are considered sufficient to ensure that opportunities for recreation close to residential development will be provided. This will minimise additional trips to Oxford Meadows SAC from site allocations within 7km and windfall development.

5.38 There will be no adverse effects on the integrity of Oxford Meadows SAC, due to recreation pressure.

³⁷

[https://meetings.westoxon.gov.uk/documents/s5040/Item%2011%20-](https://meetings.westoxon.gov.uk/documents/s5040/Item%2011%20-%20West%20Eynsham%20Masterplan%20Doc%20JANU3003_REV%20G.pdf)

[%20West%20Eynsham%20Masterplan%20Doc%20JANU3003_REV%20G.pdf](https://meetings.westoxon.gov.uk/documents/s5040/Item%2011%20-%20West%20Eynsham%20Masterplan%20Doc%20JANU3003_REV%20G.pdf)

Chapter 6

Conclusions and next steps

6.1 The HRA Screening identified that 30 policies and all of the Local Plan site allocations could result in likely significant effects, for the following impact pathways:

- Physical damage and loss of habitats at Oxford Meadows SAC;
- Air pollution – dust at Oxford Meadows SAC;
- Air pollution – vehicle emissions at Oxford Meadows SAC and Cothill Fen SAC;
- Air pollution – industrial emissions at Oxford Meadows SAC and Cothill Fen SAC;
- Water quality / quantity – abstraction at Oxford Meadows SAC and Little Wittenham SAC;
- Water quality / quantity – wastewater treatment at Oxford Meadows SAC and Little Wittenham SAC;
- Water quality / quantity – direct pollution at Oxford Meadows SAC and Little Wittenham SAC; and
- Recreation pressure at Oxford Meadows SAC.

6.2 The Appropriate Assessment was able to rule out adverse effects on integrity due to some of these impacts, as follows:

- Physical damage and loss of habitat – ruled out on the basis of Local Plan Policy DM2.
- Dust- ruled out on the basis of Local Plan Policies DM2 and DM13.
- Industrial emissions – ruled out on the basis of legislative requirements and environmental permitting.
- Abstraction and wastewater treatment – ruled out on the basis of legislative requirements and environmental permitting, and also Local Plan Policy CP5 Water Environment. Ongoing consultation with Thames Water is required to confirm the timing of infrastructure provision, however.
- Recreation pressure – ruled out on the basis of Local Plan Policies CP4, DM1, and DM7; and the site-specific requirements for accessible open space at the relevant residential site allocations.

6.3 Air quality assessment is required to enable the assessment of air pollution effects to be concluded. Adverse

effects due to vehicle emissions remain uncertain until this is completed.

Next steps

Air quality assessment

6.4 It has not been possible to conclude the assessment of air pollution effects, as an air quality assessment has not yet been undertaken. From the traffic data available to date, it seems likely that air quality assessment will be required for transects in the following locations:

- Cothill Fen SAC – Cothill Road, east of Blackhorse Lane: Changes in traffic flow exceed the DMRB screening threshold for all vehicles, in combination with other growth.
- Oxford Meadows SAC – A34: Changes in traffic flow exceed the DMRB screening threshold for all vehicles, in combination with other growth.

6.5 The air quality assessment will need to be in line with Institute of Air Quality Management guidance³⁸. Ecological assessment may also be needed. If likely significant effects are identified, mitigation will need to be agreed, tested and secured prior to the adoption of the Local Plan.

6.6 The assessment of air pollution impacts on the Habitats Sites above will be set out in an addendum to the HRA, with reference to Natural England's standing advice on air quality³⁹.

The Local Plan and HRA

6.7 This report will be subject to consultation alongside the Local Plan, as part of the Regulation 19 consultation. As part of this, Natural England will be invited to comment and to confirm whether the conclusions of the assessment are considered appropriate at this stage of plan-making.

LUC

August 2026

³⁸ <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

³⁹ Natural England (2025) Air pollution and development: advice for local authorities. Available at: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Appendix A

Attributes of Habitats Sites Assessed

Oxford Meadows SAC

A.1 Oxford Meadows is one of two SACs that represent lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*) in the Thames Valley. It includes vegetation communities that are perhaps unique in the world in reflecting the influence of long-term grazing and hay-cutting on lowland hay meadows. The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. The site is selected because Port Meadow is the larger of only two known sites in the UK for creeping marshwort *Apium repens*.

Table A.1 Attributes of Oxford Meadows SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Oxford Meadows SAC (265.89ha)	Qualifying features: H6510. Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>) S1614. <i>Apium repens</i>: Creeping marshwort Conservation objectives: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; The extent and distribution of qualifying natural habitats and habitats of qualifying species; The structure and function (including typical species) of qualifying natural habitats; The structure and function of the habitats of qualifying species; The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; The populations of qualifying species; and The distribution of qualifying species within the site.	Hydrological Changes A recent survey (August 2014) indicates the <i>Apium repens</i> population in Port Meadow has significantly declined in size. It is considered that this change may be associated directly or indirectly with hydrological changes possibly deeper, more prolonged and frequent flood episodes. Adjustment of the water level management is proposed as a means to help mitigate for these changes. Invasive Species The interest features for Oxford Meadows SAC are MG4 grassland and <i>Apium repens</i>. The <i>Apium repens</i> only occurs on Port Meadow SSSI. The concern is that <i>Crassula</i> will spread to the lower areas on Port Meadow where the <i>Apium repens</i> occurs, and that it will swamp it out.	The site is made up of an extensive complex of meadows and pastures which support species-rich grassland vegetation which would once have been widespread on floodplains in lowland England but which is now very rare. The grasslands are located on alluvial, river terrace deposits; and small scale variation in topography gives rise subtle variation in habitats, with transitions from dry grassland to fen and inundation communities. The SAC's qualifying habitat (lowland hay meadows) is part of this diverse variety of habitats. The SAC's qualifying species (creeping marshwort) is associated with seasonally-flooded habitats which are unshaded and have very low levels of competition with surrounding vegetation. The plant is tolerant of a wide range of environmental conditions and is tolerant of heavy grazing.

Cothill Fen SAC

A.2 Cothill Fen is an exceptionally important site with an outstanding range of nationally rare habitats which support a large number of rare invertebrates and plants. The habitats consist of calcareous fen, calcareous grassland, woodland and scrub of varying degrees of wetness. The habitat supports over 330 species of vascular plant and over 120 nationally scarce or rare invertebrates, including the nationally rare Southern Damselfly (*Coenagrion mercuriale*).

Table A.2 Attributes of Cothill Fen SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Cothill Fen SAC (43.55 ha)	Qualifying features: ■ H7230. Alkaline Fens; Calcium-rich springwater-fed fens ■ H91E0. Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i>; Alder woodland on floodplains Conservation objectives: ■ Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ■ The extent and distribution of qualifying natural habitats; ■ The structure and function (including typical species) of qualifying natural habitats; and ■ The supporting processes on which qualifying natural habitats rely.	Water Pollution Water samples from streams, ponds and ditches at Parsonage Moor and Cothill National Nature Reserve (NNR) show high nitrate levels. Further water quality monitoring, together with monitoring of vegetation and invertebrate populations, on Parsonage Moor, the NNR and Lashford Lane Fen needs to be carried out to identify sources, pathways and potential means of reducing nitrate levels, and to understand the effects of diffuse nitrate pollution on fen vegetation and invertebrate communities. Hydrological Changes There is concern that fen areas of Cothill Fen SAC may be becoming drier, and that this may be affecting populations of rare fen plants and invertebrates. This needs to be investigated by carrying out hydrological studies of the fen, and detailed studies of vegetation and invertebrates. Air Pollution Modelled nitrogen deposition exceeds site relevant critical load for the rich calcareous fen feature. Excess reed growth in unit 2 (Parsonage Moor & Cothill Fen NNR) which supports southern damselfly, could potentially be related to atmospheric nitrogen deposition.	The SAC is largely fen habitat, although the site shows succession through open water to fen and carr habitats. In places, the fen merges into areas of wet woodland. The SAC's qualifying habitats (Alkaline fens and alluvial forests) are part of this diverse variety of habitats. The mosaic of fenland habitats supports a rich invertebrate fauna including the nationally rare Desmoulin's whorl snail <i>Vertigo moulinsiana</i> and the damselflies Variable Damselfly <i>Coenagrion pulchellum</i> and Small Red Damselfly <i>Ceriagrion tenellum</i>. The scarlet tiger moth <i>Calliomorpha dominula</i> is also found here

North Meadow and Clattinger Farm SAC

A.3 North Meadow & Clattinger Farm Meadows SAC consists of a series of traditionally managed unimproved grasslands within the floodplain of the Upper Thames which continue to be managed as pasture and as hay-meadow. It contains a rich variety of species-rich grassland types, including the rare MG4 community for which the SAC is designated as well as a number of notable plant species. These grasslands represent rare and scattered remnants of a much more widespread unimproved grassland habitat before agricultural intensification and extensive gravel quarrying locally were responsible for widespread losses of this habitat and its subsequent fragmentation. Only the North Meadow component is within 15km of the plan area and therefore relevant to this HRA.

Table A.3 Attributes of North Meadow and Clattinger Farm SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
North Meadow and Clattinger Farm SAC (104.88 ha)	Qualifying features: - H6510. Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>) Conservation objectives: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features by maintaining or restoring; - The extent and distribution of qualifying natural habitats; - The structure and function (including typical species) of qualifying natural habitats; and - The supporting processes on which qualifying natural habitats rely.	Inappropriate Water Levels An effective WLMP needs to be in place in order to protect the integrity of the site. The current one, possibly 20 years old, is no longer fit for purpose. There have been several unseasonal floods over the last six years which are beginning to cause changes and losses in the vegetation communities on the site. Habitat Fragmentation The previously extensive species-rich grasslands have been lost over half a century to modern intensive agriculture and to widespread gravel extraction leaving only scattered remnants. Inclusion and restoration of a number of intervening sites locally would increase the habitat, thereby making it more resilient to fluctuating water levels in the face of climate change. The NNR team at North Meadow has, over a number of years, been working to achieve this aim. Also, one option is that additional land should be included within the North Meadow SSSI for this purpose. This would help buffer the site, possibly provide space for adaptation in anticipation of the effects of climate change, and better manage visitor impacts.	Both parts of the SAC sit within the Cotswold Water Park which is a manmade wetland created by the restoration of sand and gravel workings. Prior to the exploitation of sand and gravel this area of the Upper Thames catchment was made up of floodplain grassland, river habitats and arable farming. The SAC, along with a number of other associated smaller grassland SSSI, is a relic of the floodplain grazing farming system which was widespread in this area. North Meadow, which is located on the outskirts of Cricklade, between the River Thames and the River Churn is a Lammas floodplain meadow which has been managed by hay cutting and aftermath grazing for over 150 years. It is therefore reliant on flooding from adjacent watercourses (but also at risk from increased flooding). North meadow is known for a rich diversity of meadow plants, including the presence of around 95% of the UK's surviving population of the nationally scarce Snake's head fritillary <i>Fritillaria meleagris</i>.

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
		Commons Management Fencing is required to keep livestock from straying off site. North Meadow NNR is common land and it is the responsibility of neighbouring landowners to erect fences. There are a number of problems involved in achieving this Public Access/Disturbance There is increasing visitor pressure especially during the flowering time of Snake's-head Fritillary leading to localised damage on sites in the SAC. Water Pollution The SAC's hay meadow vegetation communities are sensitive to elevated nutrient levels. With increasing flooding there is an increased risk of flood water carrying diffuse pollution onto the site and causing soil enrichment with negative consequences for the species richness of the meadows.	

Hackpen Hill SAC

A.4 Hackpen Hill SAC is an extensive area of unimproved chalk grassland in the North Wessex Downs, and is considered to be one of the most important areas in the UK for the rare early gentian. The site has a variety of aspect and gradients, with the grassland dominated by red fescue and upright brome. The herb flora includes a significant population of early gentian, as well as autumn gentian, fragrant orchid, frog orchid, horseshoe vetch, common rock-rose and dwarf thistle.

Table A.4 Attributes of Hackpen Hill SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Hackpen Hill (35.83 ha)	Qualifying features: ■ H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates; dry grassland and scrublands on chalk or limestone ■ S1654 Early gentian, <i>Gentianella anglica</i> Conservation objectives: ■ Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ■ The extent and distribution of qualifying natural habitats and habitats of qualifying species; ■ The structure and function (including typical species) of qualifying natural habitats; ■ The structure and function of the habitats of qualifying species; ■ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; ■ The populations of qualifying species; and ■ The distribution of qualifying species within the site.	There are no pressures and threats identified currently affecting this site.	Hackpen Hill SAC includes extensive areas of species-rich, agriculturally unimproved chalk grassland which supports a wide range of characteristic downland plants including several orchid species. The grassland is remarkably uniform in character and includes a wide diversity of associated plants and invertebrates. The vegetation (the SAC's qualifying habitat semi-natural dry grassland) present is highly characteristic of 'mesobromion' type grassland which is typified by the presence of plants which show a preference for moderately nutrient-rich chalk soils. The SAC's qualifying species (early gentian) requires calcareous soils with low levels of competition from surrounding vegetation, and requires the availability of bare areas or broken turf for seedling establishment. <i>Gentianella anglica</i> is intolerant of shading and is usually restricted to warm, sunny, locations which are maintained in an unshaded condition by heavy rabbit, sheep or cattle grazing.

Little Wittenham SAC

A.5 One of the best-studied great crested newt sites in the UK, Little Wittenham comprises two main ponds set in a predominantly woodland context (broadleaved and conifer woodland is present). There are also areas of grassland, with sheep grazing and arable bordering the woodland to the south and west. The River Thames is just to the north of the site, and a hill fort to the south. Large numbers of great crested newts *Triturus cristatus* have been recorded in the two main ponds, and research has revealed that they range several hundred metres into the woodland blocks.

Table A.5 Little Wittenham SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Little Wittenham SAC (68.76 ha)	Qualifying features: ■ S1166. Great crested newt, <i>Triturus cristatus</i> Conservation objectives: ■ Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features. ■ the extent and distribution of habitats of qualifying species; ■ the structure and function of the habitats of qualifying species; ■ the supporting processes on which the habitats of qualifying species rely; ■ the populations of qualifying species; and ■ the distribution of qualifying species within the site.	Invasive Species Predation by fish inappropriately released into the ponds by members of the public, is seriously reducing the population of Great Crested Newts. The fish need to be completely eliminated. This is not possible using electro-fishing, because it fails to kill very small fish. There is a reduction in the Great crested newt population & breeding success due to existing fish in one of the main breeding ponds. Public Access/Disturbance There is an expected increase in visitor pressure with the expansion of nearby towns and villages.	The site is located beside the River Thames and consists of an area of woodland with ponds, as well as grassland and scrub on the slopes of a prominent hill. The SAC's qualifying species (great crested newts) are mostly associated with two larger ponds in the woodland but they range widely throughout the surrounding woodland and grassland. Newts require aquatic habitats for breeding, but juveniles spend most time on land, and all terrestrial phases may range a considerable distance from breeding sites.

River Lambourn SAC

A.6 The River Lambourn is an example of a classic chalk stream with a seasonally dry winterbourne section. It is relatively unmodified and has near-natural flow characteristics. The river supports a characteristic range of aquatic plant communities of the *Ranunculon fluitantis* and *Callitricho-Batrachion* types. As well as being classified as SAC for its river type, the Lambourn is also of importance in supporting self-sustaining populations of Bullhead *Cottus gobio*. An additional qualifying feature present is Brook lamprey *Lampetra planeri*.

Table A.6 River Lambourn SAC

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
River Lambourn (27.27)	Qualifying features: ■ H3260 Rivers with floating vegetation often dominated by water-crowfoot ■ S1096 Brook Lamprey, <i>Lampetra planeri</i>. ■ S1163 Bullhead, <i>Cottus gobio</i> Conservation objectives: ■ Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features. ■ The extent and distribution of qualifying natural habitats and habitats of qualifying species;	Siltation Siltation is an issue in several stretches of the river, mostly related to past modification of river morphology and flow rates. The river morphology is currently unfavourable but being addressed by a river restoration plan. Sediment arising from highway runoff as well as from farmland continues to be of concern and there is a diffuse water pollution plan in place to address this. Implementation of both plans is constrained by staff resources to manage projects and is threatened by future constraints on funding. Water Pollution Although significant water quality improvement has been achieved through investment by water companies in sewage treatment works and control of domestic treatment plants by Environment Agency, water pollution remains a significant issue. Both sediment and nutrient input are of concern. A diffuse pollution plan is in place and catchment sensitive farming initiative covers the catchment. However, evidence of diffuse pollution remains, and this has the potential to affect aquatic habitats and species as well as habitat quality in areas of riverside habitat supporting Desmoulin's whorl snail <i>Vertigo moulinsiana</i>. Diffuse pollution is arising from highway runoff as well as from farmland. Pollution also results from overflowing sewers (a result of high groundwater levels infiltrating sewers) with ongoing/recurring incidents at numerous locations on the River Lambourn.	The River Lambourn is a lowland chalk river, fed by the chalk aquifer, and has a characteristic flora dominated by pond water-crowfoot (which defines the SAC's qualifying habitat). In the upper section, the river is a 'winterbourne' which only flows once groundwater levels have risen; these have their own unique ecology. Between the villages of Lambourn and Great Shefford the river flows mainly through agriculturally improved pasture and arable fields, whilst the section south of Great Shefford to Bagnor meanders through disused water meadow systems, wet pastures and woodlands. Additional habitats associated with the river include areas of fringing reed swamp, tall fen and willow carr. The river supports a diverse assemblage of native fish species, including bullhead, brook lamprey, grayling, brown trout and minnow. The SAC's qualifying species are brook lamprey and bullhead. Bullhead is dependent upon good water quality, and good quality habitat conditions which provide critical features such as stones on the river bed, submerged tree roots, woody debris dams and

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
	■ The structure and function (including typical species) of qualifying natural habitats; ■ The structure and function of the habitats of qualifying species; ■ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; ■ The populations of qualifying species; and ■ The distribution of qualifying species within the site.	Invasive species Signal crayfish <i>Pacifastacus leniusculus</i> have been abundant in most stretches of the river for almost 20 years and they are thought to be having significant adverse impacts on native species through predation (of fish fry and invertebrates), competition for breeding sites and cover (with bullhead and lamprey), and destruction of river banks. No effective means of control are available at present. However, no information is available on the scale of the impact and research to determine this may help to develop means to mitigate or ameliorate these effects. <i>Azolla Mosquito ferns</i> also a recurring problem in parts. It forms floating mats where flow is impeded resulting in impoverishment of species diversity. Some success has been achieved through biological control. May not be a significant issue once main water control structures have been modified/removed. Hydrological changes An increase in unseasonally high groundwater levels, prolonged periods of high rainfall, and prolonged periods of drought are all likely to be exerting stress and adverse impacts on the river and associated flora and fauna. There is a need for consideration of means of ameliorating these impacts at a catchment scale. There is concern that Desmoulin's whorl snail populations have undergone significant decline, which may be related to increased prevalence of prolonged periods of drought and prolonged summer flooding. Inland flood defence works There is currently increased pressure from domestic property owners to reduce flood risk. This highlights the need for a revised flood defence strategy for the river which takes changes in rainfall patterns into account and considers action at a catchment level. Inappropriate cutting/mowing As a result of increased fear of flood risk there is pressure to increase removal of in-channel vegetation over and above that which would traditionally be cut for fisheries management. This has the potential to significantly change the character of the ecology of the river. Additionally,	macrophyte beds for shelter, feeding and egg-laying. Brook lamprey, during their larval stage, live submerged in deposits of sediment on the bed of the river feeding on tiny organisms such as diatoms extracted from the surrounding water. The River Lambourn provides good habitat conditions for brook lamprey. Like the bullhead, brook lamprey are dependent upon the availability of features typical of natural rivers including the absence of barriers to upstream and downstream movement, gravel beds for spawning, silt beds to support the larval stage, good water quality and low levels of abstraction.

Site Name (Area, ha)	Qualifying features and conservation objectives	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
		there is risk associated with the fact that a single individual undertakes weed cutting management over a large proportion of the river. There is a need to ensure that there is transfer of knowledge of the river to a new generation of river managers to secure sympathetic management into the long term. This is increasingly relevant as the pattern of land ownership alongside the river changes and in face of increasing pressure to carry out ad hoc weed management. Change in land management Part of the complex (Boxford Water Meadow) has suffered from management neglect and loss of riparian structure. Although infrastructure is now in place to facilitate restoration of grazing the landowner is dependent upon third parties for grazing. A longer-term management solution is desirable. Inappropriate water levels, Water supply to parts of the complex is vulnerable to changes in control structures by third parties (Speen Moor, Rack Marsh). Greater control of these structures is desirable. Hydrological changes Parts of the floodplains are becoming less suitable for Desmoulin's whorl snail. The reason for this is not clear and needs investigation. Water pollution It is currently unclear whether molluscicides derived from farmland in river water are affecting Desmoulin's whorl snail populations in the catchment. It is possible that this is contributing to local declines or losses of populations and needs investigation. Advice on molluscicide use is delivered via CSF but unclear whether this is effective.	

Appendix B

HRA Screening

Table B.1 Screening matrix – Local Plan policies

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy SP1 – Settlement Hierarchy	None	None	No This policy establishes a clear settlement hierarchy for the District, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations will be assessed in relation to draft site allocations.
Policy SP2 – Spatial Strategy	None	None	No This policy explains the reasoning why development is prioritised in some areas, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations will be assessed in relation to draft site allocations.
Policy SP3 – Key Development Principles	None	None	No This policy sets out a series of key principles which all new development will be expected to adhere to in the interests of good planning and protecting and enhancing the District's built and natural environment, and local communities, but in itself will not result in new development
Policy SP4 – Cotswolds National Landscape (CNL)	None	None	No This policy ensures that development within and around the Cotswolds National Landscape conserves and enhances its natural beauty, special qualities, and scenic and cultural heritage, while safeguarding its biodiversity and tranquillity, and in itself will not result in new development
Policy SP5 - A40 Mass Rapid Transit (MRT) Corridor	Transport	Air pollution – vehicle emissions Direct pollution / run-off	Yes This policy enables development of a corridor of land along the A40, for a mass rapid transport scheme. This is intended to reduce travel by car but may alter traffic flows on roads and result in vehicle emissions elsewhere. Part of the safeguarded land is upstream of Oxford Meadows SAC, so there is a risk of direct pollution of water courses.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
CP1 – Climate Change	Renewable energy infrastructure (wind turbines, solar)	Bird strike Visual disturbance Physical damage to or loss of habitat Direct pollution / run-off Air pollution - dust	Yes The policy requires development to 'maximise opportunities for renewable energy generation on site', which could include wind turbines (bird strike) and solar farms (visual disturbance). None of the Habitat Sites within 20km of the plan area are designated for bird species or species vulnerable to visual disturbance. However, the location of potential development is currently unknown; therefore there may be effects associated with proximity to a Habitats Site. The policy encourages the following measures that could provide mitigation for impacts associated with other policies in the plan (considered at the AA stage): ■ All new development will be expected to address "Locating and designing development to reduce reliance on private car use and promote walking, cycling and public transport through prioritising sustainable infrastructure and connectivity." ■ Water efficiency: All new development must "demonstrate they are resilient to the impacts of climate change by ... b. maximising water efficiency".
Policy CP2 – Delivering New Homes (18,318 homes, of which 13,640 are proposed to be on allocated sites, and 2,100 at windfall sites. The remainder are being delivered on existing sites with planning permission.)	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes. This policy allows for 18,318 new homes to be delivered over the plan period, of which 15,740 will be within site allocations proposed as part of the plan or windfall sites that come forward. These will contribute to effects largely relating to overall population increase, such as recreation pressure, air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy CP3 – Supporting Economic Growth and Local Prosperity (4.5ha of Planning Use Classes E Office, Research &	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution - dust; vehicle and industrial emissions Changes in water quality / quantity	Yes. This policy defines the overall employment requirement of up to 29.5ha of office/R&D/industrial uses and therefore will contribute to effects such as air pollution and water abstraction/treatment.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Development, and Light Industrial; and 25ha of B2 and B8 Industrial and Logistics)		Loss of or damage to habitats	Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy CP4 – Delivering infrastructure in step with new developments	None	None	No This policy explains how infrastructure will be delivered alongside development (e.g. planning controls and infrastructure delivery plans), but will not itself result in new development. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ “Development proposals must be supported by timely provision of new or enhanced infrastructure necessary to meet the needs arising from the development, due to its individual or cumulative impact, including, but not limited to, energy, transport, utilities, education, healthcare, open space and community facilities. Necessary infrastructure must be delivered in step with the phasing of development to ensure it is available when required by future occupants or users.” ■ “Where development provides shared infrastructure such as public open space, green infrastructure, sustainable drainage systems, heat networks and community energy or other community facilities, proposals must demonstrate appropriate arrangements for their long-term management and maintenance.” ■ “Where necessary, such mechanisms will be used to ensure that development cannot commence or be occupied (depending on the circumstances of the case) until such time as the necessary infrastructure has been secured and programmed for delivery.”
Policy CP5 – Water Environment	None	None	No This policy sets out requirements for the protection of the water environment and will not result in new development.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ 1.d “Development proposals must incorporate sustainable drainage systems and, where appropriate, natural flood management measures and multifunctional green infrastructure to manage surface water runoff, improve the ecological status of watercourses and waterbodies, and provide wider environmental benefits in line with priorities identified by river catchment partnerships.” ■ 2. “Development proposals affecting, adjacent to, or with the potential to influence watercourses, waterbodies and their associated riparian environments must, where relevant and proportionate to the type, scale and location of the proposal: a. Protect and, where possible, enhance the ecological value, natural functioning and connectivity of watercourses, waterbodies and associated habitats. b. Conserve and support the recovery of aquatic and riparian habitats, species and ecological networks, including through the restoration of natural river processes and habitat complexity where opportunities arise. c. Avoid or minimise adverse impacts on the ecological, hydrological and geomorphological functioning of the water environment and demonstrate that any necessary infrastructure or interventions including culverts and artificial lighting, have been designed sensitively to support nature recovery in accordance with best practice guidance. d. Contribute positively towards nature recovery and ecological connectivity.” ■ 3.a “All development must provide necessary water supply infrastructure and ensure water supply security. Any off-site upgrades to water infrastructure needed to meet this requirement must be delivered prior to occupation.” ■ 3.b “All development must promote water conservation; i. Proposals for new dwellings must demonstrate how they can meet a target of no more than 100 litres per person per day, through water efficient fixtures, recycling systems, and greywater or rainwater reuse. ii. Commercial development must achieve

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			at least the BREEAM “excellent” standard for the “Wat 01” water category or equivalent.” ■ 4. “a. Development that increases wastewater discharges must be supported by necessary wastewater infrastructure and ensure that wastewater is managed sustainably, without adverse ecological impact on water bodies or ecosystems. b. Proposals for development must demonstrate that appropriate sewerage and wastewater infrastructure, treatment and discharge arrangements, water quality safeguards, and pollution prevention measures will be provided in accordance with Policy CP4.” And “a. In accordance with national guidance, all development must prioritise connection to the public foul sewer. Only where it can be robustly demonstrated that it is not feasible or reasonable to do so, will an alternative private treatment arrangement be considered, subject to Environment Agency support.”
Policy CP6 - Design Excellence and Placemaking	None	None	No The policy sets qualitative design and sustainability standards for development brought forward under other policies, and in itself will not result in new development
Policy CP7 - Healthy Place Shaping	None	None	No This policy sets a framework for ensuring that development coming forward under other policies contributes positively to public health and well-being, and in itself will not result in new development
Policy CP8 – Sustainable and Integrated Transport	None	None	No This policy is intended to reduce travel by fossil fuelled vehicles and encourages new transport infrastructure but will not itself result in new development. New development will be assessed in relation to the site allocations. The policy includes the following, which may contribute to mitigation (considered at the AA stage):

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			■ “Development must prioritise transport modes in the following hierarchy, where appropriate to the location and nature of development: a. Walking, wheeling and cycling b. Public transport c. Shared and low-emission vehicles d. Private motor vehicles” ■ “Development proposals must: a. Be supported by a proportionate transport assessment or statement and travel plan where they have significant transport implications b. Demonstrate that residual cumulative impacts are not severe and that highway safety is not compromised; c. Identify and secure necessary mitigation and infrastructure improvements, prioritising sustainable transport measures. d. Where necessary, and applicable, be accompanied by a Construction Traffic Management Plan to demonstrate how proposals will mitigate safety and amenity risks during construction.”
Policy CP9 – Historic Environment	None	None	No This policy provides a framework for assessing and managing the impact of development on heritage assets, ensuring conservation and enhancement of historic character, and in itself will not result in new development
Policy CP10 – Nature Recovery	None	None	No This policy ensures that all new development in West Oxfordshire actively contributes to the protection, enhancement, and recovery of the District’s natural environment, and will not result in new development. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ “Having regard to the nature, scale and location of a proposal, development must contribute to nature recovery in West Oxfordshire. Development proposals will be expected to address the following requirements where they are relevant and proportionate; a. Make a positive contribution toward the protection, enhancement and recovery of the natural environment including priority habitats and species.”

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			■ “Proposals for development where there is potential for ecological loss, deterioration or harm, will be required to prepare and submit an Ecological Impact Assessment in accordance with best practice guidance.”
Policy CA1 – Strategic Development Framework for the Carterton Area	None	None	No This policy sets out the overarching aims for Carterton but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy CA2 – Carterton Town	None	None	No This policy sets out the overarching aims for Carterton town centre but will not itself result in new development. Development location has been assessed in relation to the site allocations
Policy CA3 - RAF Brize Norton	Employment development Infrastructure development Changes in vehicle traffic Water abstraction / discharge	Air pollution – vehicle emissions Changes in water quality / quantity	Yes This policy permits development at the existing RAF site near Carterton. This location is not near to any Habitats Sites, but development could contribute to in-combination effects associated with general development (traffic, water consumption/treatment).
Policy WIT1 – Strategic Development Framework for the Witney Area	None	None	No This policy sets out the overarching aims for Witney but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy WIT2 – Witney Town Centre	None	None	No This policy sets out the overarching aims for Witney town centre but will not itself result in new development. Development location has been assessed in relation to the site allocations.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy WIT3 – Windrush Valley	None	None	No This policy guides development proposals and land management within the Windrush Valley, supporting the conservation, restoration, and flood management within Windrush Valley, and in itself will not result in new development The policy includes the following, which may contribute to mitigation (to be considered at the AA stage): ■ All proposals across the Windrush Valley must: “Protect, restore and enhance ecological networks, priority habitats, river corridors and green and blue infrastructure, contributing to nature recovery and improved ecological connectivity. c. Protect and enhance the ecological and hydrological functioning of the River Windrush and its tributaries, including measures to improve water quality, reduce pollution, support natural river processes and maintain floodplain connectivity. d. Avoid development that would result in the loss, fragmentation or deterioration of floodplain habitats, wetland habitats or areas important for natural flood management, unless it can be demonstrated that there would be no unacceptable adverse effects and appropriate mitigation and enhancement measures are secured.”
Policy CN1 – Strategic Development Framework for the Chipping Norton Area	None	None	No This policy sets out the overarching aims for Chipping Norton but will not itself result in new development. Development location has been assessed in relation to the site allocations
Policy CN2 – Chipping Norton Town Centre	None	None	No This policy sets out the overarching aims for Chipping Norton town centre but will not itself result in new development. Development location has been assessed in relation to the site allocations

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy BA1 – Strategic Development Framework for the Bampton Area	None	None	No This policy sets out the overarching aims for Bampton but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy BU1 – Strategic Development Framework for the Burford Area	None	None	No This policy sets out the overarching aims for Burford but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy BU2 - Burford Town Centre	None	None	No This policy sets out the overarching aims for Burford town centre but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy CH1 – Strategic Development Framework for the Charlbury Area	None	None	No This policy sets out the overarching aims for Charlbury but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy EYN1 – Strategic Development Framework for the Eynsham Area	None	None	No This policy sets out the overarching aims for Eynsham but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy LH1 - Strategic Development Framework for the Long Hanborough Area	None	None	No This policy sets out the overarching aims for Long Hanborough but will not itself result in new development. Development location has been assessed in relation to the site allocations.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy WO1 - Strategic Development Framework for the Woodstock Area	None	None	No This policy sets out the overarching aims for Woodstock but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy WO2 – Woodstock Town Centre	None	None	No This policy sets out the overarching aims for Woodstock town centre but will not itself result in new development. Development location has been assessed in relation to the site allocations.
Policy WO3 – Blenheim Palace World Heritage Site (WHS)	None	None	No This policy places control to ensure the protection, conservation, and enhancement of Outstanding Universal Value (OUV) of Blenheim Palace World Heritage Site, and will not result in new development.
Policy RA1 – Strategic Development Framework for the Rural Area	None	None	No This policy sets out the overarching aims for the villages and hamlets in West Oxfordshire, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations are assessed in relation to the site allocations.
Policy DM1 – Green Infrastructure	Green infrastructure	None	No This policy requires developments to contribute to the provision of new green infrastructure and will not increase traffic or visitor numbers to Habitats Sites. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ Development proposals are expected to “a. Protect existing publicly accessible open spaces from unnecessary loss or fragmentation. b. Strengthen connectivity, integration and multifunctionality to deliver a coherent, high-quality network that benefits people, nature and climate

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			resilience. c. Provide new multifunctional GI that is safe, inclusive and accessible” ■ “a. All major development proposals must be supported by a Green Infrastructure Strategy, proportionate to the scale and nature of the development. The Strategy must: i. Identify and map existing green infrastructure assets and networks including those extending beyond the development site boundary; ii. Demonstrate how these assets and networks will be protected, enhanced, integrated and connected; iii. Set out arrangements for the delivery, long-term management and maintenance and monitoring of green and blue infrastructure, including governance and funding mechanisms in accordance with Policy CP4. b. In addition, all strategic development sites of more than 300 homes, around 50% of the site area (including private garden space) should contribute to the overall green infrastructure network. The exact proportion of green infrastructure must be informed by site-specific constraints, masterplanning and viability considerations, provided the overall function, quality and connectivity of the network are not undermined.”
Policy DM2 - Ecological Protection, Biodiversity Net Gain and Nature	None	None	No This policy sets out a mitigation hierarchy and BNG principles/targets and will not result in new development. The policy includes the following, which may contribute to mitigation (to be considered at the AA stage): ■ “All development must achieve no net loss of biodiversity, having regard to the existing (pre development) biodiversity value of the site, and demonstrate biodiversity enhancement to achieve gains where possible” ■ All development proposals must follow the mitigation hierarchy to address biodiversity impacts: [Avoid, Minimise, Mitigate, Compensate].

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			■ “Development likely to result in any direct or indirect loss, deterioration or harm to the following ecological features will be refused unless there is a robust justification for a lack of reasonable alternative sites that would result in less or no harm or there are wholly exceptional reasons justifying the granting of planning permission, and a suitable compensation strategy exists. 264 i. Local Wildlife Sites and Proposed Local Wildlife Sites ii. Local Nature Reserves iii. Priority habitats iv. Priority species v. Local Geological Sites vi. Important and/or ancient hedges and/or hedgerows vii. Ancient woodland and/or ancient and/or veteran trees; and/or viii. Rivers and streams.” ■ “a. Where the loss of ecological features cannot be prevented or adequately mitigated, appropriate compensation measures will be sought to offset the loss by contributing to appropriate local nature recovery projects to achieve an overall gain in biodiversity. b. Measures proposed to mitigate adverse ecological impacts to meet requirements for compensation above will be given weight proportionate to their likelihood of success. Where reasonable doubt exists as to the effectiveness of any such measures, weight afforded to those measures will be significantly reduced.”
Policy DM3 - Conserving and Enhancing Landscape Character through New Development	None	None	No This policy ensures that new development conserves and enhances the character and quality of the surrounding landscape, and will not result in new development
Policy DM4 - Light Pollution and Dark Skies	None	None	No This policy sets out principles for the reduction of light pollution and protection of dark skies, and will not results in new development. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ All development with external lighting should “Be designed and installed in a way that minimises light spill beyond the development site and prevents

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			skyglow. Lighting should be directed downwards, shielded, and controlled to avoid upward light spill, glare, and light pollution.” And “be minimised and directed and controlled to avoid impacting dark skies and wildlife.” ■ Wildlife Considerations: “a. New development must consider the potential impact of lighting on wildlife habitats, especially where these areas are known to support protected species, including river corridors recognised as dark ecological networks. b. Proposals must incorporate design features that minimise the effects of lighting on sensitive species, such as low-light zones, lighting shields, and light-curtaining techniques. c. Where new development is proposed near sensitive habitats (such as wetlands, woodlands, or wildlife corridors), a buffer zone should be maintained that limits the use of lighting and reduces its impact on biodiversity.”
Policy DM5 – Efficient Use of Land for Development	None	None	No This policy sets principles for prioritising development e.g. on brownfield land and urban areas but will not itself result in new development. Development location is assessed in relation to the draft site allocations.
Policy DM6 – Trees and Hedgerows and Woodland	None	None	No This policy sets out principles for the protection and enhancement of trees and hedgerows, and will not results in new development. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ Where possible, existing trees and hedgerows should be retained and incorporated into development proposals. ■ Proposals should implement a 50 metre development free buffer to all ancient woodland.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy DM7 – Sport, Recreation and Play	Sport, recreation and play development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports and facilitates the delivery of new sport, recreation, and play infrastructure as part of new residential or mixed-use development; and therefore could contribute to effects related to changes in vehicle movements (air pollution) and possibly also water abstraction/treatment, depending on the nature of the facility. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM8 – A Healthy Food Environment	Green and blue infrastructure	None	No This policy encourages food growing opportunities, and defines broad locations for food retail and take-aways, but will not result in development that could have likely significant effects.
Policy DM9 – Net Zero Carbon Development	None	None	No Sets out the approach to reducing carbon emissions from new developments, but in itself will not result in new development
Policy DM10 - Renewable and Low Carbon Energy Development	Renewable energy infrastructure (wind turbines, solar)	Bird strike Visual disturbance	No None of the Habitats Sites within 20km of the plan area are designated for bird species or species vulnerable to visual disturbance.
Policy DM11 – Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience	None	None	No Sets out the approach to retrofitting existing buildings for energy efficiency, but in itself will not result in new development
Policy DM12 -Waste and the Circular Economy	Waste management infrastructure Changes in vehicle traffic (HGVs)	Non-physical disturbance (odour) Air pollution – dust and vehicle emissions Loss of or damage to habitats	Yes None of the Habitats Sites are designated for species that would be affected by odour from waste management infrastructure within individual developments. Changes in vehicle traffic are assessed in relation to the associated residential/employment developments, rather than separately; traffic data typically

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
		Direct pollution / run-off	takes into account vehicle mix, e.g. a proportion of HGVs for servicing developments. However, depending on the location of new development, there may be effects related to proximity to a Habitats Site. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ All developments are required to minimise adverse impacts on soil resources.
Policy DM13 - Air Quality and Pollution	None	None	No This policy ensures new development contributes to the protection and improvement of air quality. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ “Development proposals that individually or cumulatively could lead to a deterioration in air quality, particularly in or near the following sensitive areas, will be subject to stricter scrutiny and mitigation requirements:...b) The Oxford Meadows Special Area of Conservation (SAC)” ■ “An Air Quality Impact Assessment (AQIA) will be required for: a) All major developments. b) Any development likely to result in a significant increase in vehicle traffic or emissions (e.g. from heating, industrial uses). c) Any development located within or near an AQMA or the Oxford Meadows SAC. d) Proposals that form part of a larger cumulative development likely to impact local or strategic air quality levels.” and “AQIAs must assess the potential impacts on local air quality during both construction and operation, taking into account cumulative effects with other planned or existing developments. They should model pollutant levels where appropriate and evaluate impacts on human health and ecological receptors.” ■ “All development proposals in or within 500m the Oxford Meadows SAC must demonstrate compliance with Habitat Regulations and ensure there is no

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
			adverse effect on the integrity of the protected site from air pollution, alone or in combination with other plans or projects.” ■ “All major development must incorporate Construction Environmental Management Plans (CEMP) that include: a. Dust suppression and control measures.” And “Particular care must be taken in air quality sensitive areas (the AQMAs and within 500m of the Oxford Meadows SAC), where enhanced construction management and controls may be required.” ■ “In air quality sensitive areas (the AQMAs and within 500m of the Oxford Meadows SAC), development proposals may be required to contribute to: a. Air quality monitoring during and post-construction. b. The preparation of Air Quality Management Plans (AQMPs). c. Ongoing compliance reviews and adaptive mitigation where thresholds are at risk of being exceeded.” ■
Policy DM14 – Town Centres	None	None	No This policy defines principles for development within town centres but will not itself result in new development.
Policy DM15 - Community Facilities and Services	Community facilities and services Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports new or enhanced community facilities. Depending on the nature of the facilities, this could increase/alter traffic flows and demand for waste supply and treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM16 – Active and Healthy Travel	None	None	No This policy encourages active travel (e.g. walking/cycling infrastructure) but will not itself result in new development. New development is assessed in relation to the draft site allocations.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy DM17 – Parking Standards for New Development (Car and Cycle Parking)	None	None	No This policy sets out standards and requirements for car and cycle parking provision as part of development proposals that may come forward under other policies. The policy includes the following, which may contribute to mitigation (considered at the AA stage): ■ All new developments must provide high-quality, secure, and accessible cycle parking in line with minimum standards. ■ Car-free and low-car developments will be supported in locations "where accessibility to sustainable transport and local services is demonstrably high."
Policy DM18 - Windfall Housing Development on Unallocated Sites	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes This policy sets out the principles that determine where windfall development will be permitted and establishes which scale windfall development may be permissible at based on the settlement hierarchy. Although it only sets out principles, it enables the likely location of windfall development to be assessed. Windfall housing, like other residential development will contribute to effects largely relating to population increase, such as recreation pressure, air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM19 – Creating Mixed and Balanced Communities	None	None	No This policy describes the mix of dwelling size/type and the proportion of accessible housing that will be provided but will not itself result in new development (beyond that defined by other policies)
Policy DM20 – Affordable Housing	None	None	No This policy describes the mix of housing tenure that will be provided but will not itself result in new development (beyond that defined by other policies)

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
Policy DM21 - Specialist Housing	None	None	No This policy supports and encourages the inclusion of specialist housing for older people (within the overall provision for residential development, which is assessed under the housing policies). It will not lead to new development in itself but will likely lead to considerations for specialist housing within new developments.
DM22 – Custom and Self-build Housing	None	None	No This policy requires that at least 5% of dwellings on major sites (100+ homes) be provided as serviced plots for custom and self-build, and will not lead to new development in itself
Policy DM23 - Community-Led Housing	None	None	No This policy sets out principles for community led housing schemes but will not result in new development over and above that set out in other policies.
DM24 – Meeting the Needs of Travelling Communities (36 new pitches to be delivered over the plan period, comprising 28 pitches to meet the identified need of Gypsies and Travellers and 8 new pitches to meet the need of Travelling Showpeople)	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes The quantum of residential development proposed comprises 36 new pitches over the plan period, and as such is small-scale. The policy may result in a Likely Significant Effect in-combination with other policies resulting in residential/other development. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM25 - Loss, Replacement and Sub-Division of Existing Dwellings	Single building subdivision, extension and changes of use Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity	No This policy facilitates and supports the subdivision of existing dwellings into multiple units, and extensions/alterations to existing residential buildings. Single building subdivision, extensions or changes of use could slightly increase the number of people living in a single residence, but not to the extent that there would be likely significant effects.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
DM26 - Conversion, Extension and Alteration of Traditional Buildings	Single building extensions, conversions or changes of use Changes in vehicle traffic Water abstraction / discharge	Recreation pressure Air pollution Changes in water quality / quantity	No This policy sets out the limited circumstances within which conversion, extension, and alteration of traditional buildings would be permitted. Single building extensions or conversions could slightly increase the number of people living in a single residence, but not to the extent that there would be likely significant effects.
Policy DM27 - Provision and Protection of Land for Employment	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports employment development in the District within Allocated Sites and at the district's market towns and village; and therefore has the potential to contribute to effects relating to changes in (working) population (e.g. air pollution). Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM28 - Supporting the Rural Economy	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports economic development in rural areas such as small-scale employment sites, farm diversification schemes, and rural enterprise; and therefore will contribute to effects largely relating to working population increase, such as air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM29 - Learning, Skills and Training Opportunities	Education infrastructure Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports and facilitates the creation, expansion, or alteration of education infrastructure; and therefore will contribute to effects largely relating to population increase, such as air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
Policy DM30 - Sustainable Tourism	Tourism development Changes in vehicle traffic	Air pollution – dust and vehicle emissions	Yes

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Is Appropriate Assessment required? i.e. because likely significant effects cannot be ruled out
	Water abstraction and discharge	Recreation pressure. Changes in water quality / quantity Loss of or damage to habitats	This policy provides for tourism development in the District. This has the potential to contribute to effects largely related to overall quantum of development, e.g. air pollution, recreation pressure or changes in water quality / quantity. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM31 - Digital Infrastructure and Connectivity	None	None	No This policy is intended to promote the development of new and enhanced digital infrastructure, and will not lead to new development in itself.

Table B.2 Screening matrix – site allocations

Type of impact	Screening criteria ('Development site could have a significant effect if...')	Potential development sites meeting screening criteria (sites to be considered in Appropriate Assessment)
Physical damage and loss of habitat	Development takes place within or immediately adjacent to Oxford Meadows SAC.	None – no site allocations within/adjacent to SAC
Bird/bat strike	Wind turbine development takes place near to sites with qualifying bat/bird species.	None - no Habitats Sites within 20km of the plan area have qualifying bird/bat species; and none of the site allocations are for renewable energy development.
Non-physical disturbance (vibrations, noise and lighting)	Development occurs within 500m of a Habitats Site that supports qualifying features susceptible to impacts from non-physical disturbance, such as vibration, noise and light.	None – no site allocations within 500m of a Habitats Site; and Habitats Sites within the plan area do not have qualifying features that are sensitive to non-physical disturbance
Air pollution- Dust	Development occurs within 500m of Oxford Meadows SAC.	None – no site allocations within 500m of the SAC
Air pollution- Vehicle emissions	Development occurs within 10km of a Habitats Sites and results in one or more of the following on roads within 200m of a sensitive Habitats Sites:	All site allocations

Type of impact	Screening criteria ('Development site could have a significant effect if...')	Potential development sites meeting screening criteria (sites to be considered in Appropriate Assessment)
	Daily traffic flows increasing by 1,000 AADT (Annual Average Daily Traffic) or more (alone or in combination); or Heavy duty vehicle (HDV) flows increasing by 200 AADT or more (alone or in combination); or Daily average speed changing by 10 km/hr or more; or Peak hour speed changing by 20 km/hr or more; or Road alignment changing by 5 m or more The only Habitats Site within 10km of the plan area and within 200m of a main road is listed below with the strategic roads that are within 200m: Oxford Meadows SAC (partially within east of plan area): A40 and A34.	
Air pollution- Industrial emissions	Habitats Sites within 10km of the plan area that are sensitive to air pollution are: Oxford Meadows SAC (partially within east of plan area); and Cothill Fen SAC (3.2 km to southwest)	■ RA2 Enstone Airfield Area of Redevelopment Opportunity ■ EYN1.Strategic Development Framework for the Eynsham Area
Changes in water quantity / quality- Increased demand for water (abstraction)	Development increases demand for water supply from the River Thames, upstream of Oxford Meadows SAC and/or Little Wittenham SAC).	All site allocations
Changes in water quantity / quality- Increased need for water treatment	Development increases demand for wastewater treatment that discharges into the River Thames, upstream of Oxford Meadows SAC and/or Little Wittenham SAC	All site allocations

Type of impact	Screening criteria ('Development site could have a significant effect if...')	Potential development sites meeting screening criteria (sites to be considered in Appropriate Assessment)
Changes in water quantity / quality - Direct pollution (run-off)	Development is within 500m of Oxford Meadows SAC or within 500m of (or otherwise hydrologically connected to) the River Thames, upstream of Oxford Meadows SAC and/or Little Wittenham SAC.	- EW1 Salt Cross Garden Village, c.450m from River Evenlode. - EW2 West Eynsham SDA, adjacent to ditches running into River Thames (c.1.2km away). - LH3 Land West of Hanborough Station, c.130m from River Evenlode. LH2 Hanborough Station Area of Redevelopment Opportunity, c.50m from River Evenlode
Recreation pressure	Residential development / overnight accommodation is within 7km of the Oxford Meadows SAC or the Cothill Fen SAC.	The following residential site allocations fall within the Oxford Meadows SAC 7km ZOI: - EW1 Salt Cross Garden Village, 2,200 dwellings; - EW2 West Eynsham SDA, 950 dwellings; and - LH3 Land West of Hanborough Station, 300 dwellings. The following residential site allocations fall within the Cothill Fen SAC 7km ZOI: - None

Appendix C

Record of consultation

C.1 A record of comments received on earlier versions of the HRA, and how those have been addressed.

Table C.1 Record of consultation

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
Natural England, Reg18 consultation 2026	"We have reviewed the HRA screening report and we have no comments to make at this stage. We look forward to receiving a copy of the Appropriate Assessment at the next stage of consultation."	Noted. No action required.
The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust; Reg18 consultation 2026	"Proximity of [A40] corridor to Oxford Meadows SAC and Cassington Gravel Pits LWS. Need for text ensuring protection of designated sites if the proposal progresses." "BBOWT greatly welcomes the inclusion of Policy CP12, and broadly welcomes the text of the policy, particularly that in relation to the LNRS and LWSs. However, we were concerned by the lack of reference here to standard biodiversity policies based around protected or priority sites, habitats and species. We would suggest these need to be the core of any biodiversity policies and would largely need to be additional to the proposed text in Policy CP12, which we welcome, although there is some degree of overlap. [...] we consider that appropriate policy is needed for SACs and SSSIs as well, at least as strong as that for LWSs above. West Oxfordshire has a wealth of designated sites rich in wildlife within its boundaries, and it is essential that their protection is ensured into the future. These should be protected not only from direct impact, but also indirect impact through hydrology, pollution, ecological isolation and recreational pressure amongst other issues. In addition to policy, a map should also be included to show the above sites; Although we greatly welcome it, we do not consider that the text beginning: "Requirements for new development All major development proposals will be required to demonstrate that they:" provides adequate protection for SACs and SSSIs, both in any case, but also because it specifically refers to major development, and minor development can also have significant impact on SACs and SSSIs, both directly and indirectly."	Policy DM2 has been updated to provide more robust protection for Habitats Sites, along similar lines to those suggested by BBOWT. This HRA has assessed the updated version of the policy.
Windrush Against Sewage Pollution, Reg18 consultation 2026	"There is currently no option on the table for legal disposal of sewage/grey water from the Salt Cross development. The nearest logical option in Cassington STW. There is	A Water Cycle Study has been completed, and the Council will also continue

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
	however no extant plan included in AMP8 (2025-30) by Thames Water for a significant upgrade to increase capacity adequately to deal with the Salt Cross effluent.” “There is currently no option on the table for legal disposal of sewage/grey water from the Salt Cross development. The nearest logical option in Cassington STW. There is however no extant plan included in AMP8 (2025-30) by Thames Water for a significant upgrade to increase capacity adequately to deal with the Salt Cross effluent.” “There are clear risks with increased development in already overloaded/under capacity sewage treatment work catchments. These concerns are particularly acute where small rural sewage works are in place. Many of these and the sewer network serving them are routinely poorly performing, leading to often long and illegal spilling of sewage into local watercourses. Standlake, Bampton, Brize Norton, Church Hanborough, Charlbury, Chipping Norton, South Leigh and Stanton Harcourt are examples. Witney STW has just been upgraded by Thames Water but no attempt has been made by the company to address infiltration into the sewer network, leaving it vulnerable to continued long illegal spills of untreated sewage.” “Many sewage treatment works are now operating illegally and are unable to accommodate extra sewage generated by proposed developments. WODC must state this clearly in its local plan, guided by the forthcoming Water Cycle study. It should produce clear policy statements to ensure that no new developments are commenced until the receiving sewage treatment works are upgraded to ensure adequate capacity and legal compliance with their permits.”	to work with Thames Water to ensure that the required water infrastructure is provided in step with development (see Chapter 6). From the point of view of the HRA, there are no adverse effects on integrity of Habitats Sites, as the safeguards within these policies are sufficient to ensure that development would not be permitted where there is insufficient water supply or wastewater infrastructure capacity; and the policy ensures that demand for infrastructure is minimised.
Environment Agency, Reg18 consultation 2026	“Policy CP1 could be strengthened by recognising the opportunities for development near or over watercourses to contribute to flood resilience and ecological enhancement. We would recommend wording along the lines of the following is included: “Development in these locations should seek to: • Retain and enhance natural floodplain capacity to manage high flows and reduce flood risk. • Integrate in-channel features such as riffles, pools, and woody material to improve flow diversity, support aquatic life, and maintain ecological function during low flows. • Restore and protect riparian buffer zones - with a minimum width of 10 metres from watercourses - to improve water quality, provide shading, and increase habitat connectivity. • Avoid hard engineering solutions that limit natural processes and reduce adaptive capacity.” These nature-based measures directly support the Plan’s objectives around climate adaptation, biodiversity net gain, and long-term resilience, and should be reflected within the	The wording of Policy CP1 has not been updated with the wording suggested by the Environment Agency, but still provides general protection for watercourses. This HRA assesses the most recent policy wording. Policy DM2 has also been updated to strengthen the protection of Habitats Sites generally and watercourses upstream. This is sufficient to avoid adverse effects on integrity relating to development in proximity to watercourses (habitat loss, dust and direct pollution).

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
	climate impact assessment and design expectations of CP1.	
Thames Water, Reg18 consultation 2026	“We support Policy CP6 in principle as it is in line with our previous representations but consider that further improvements are required. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.” “National Planning Practice Guidance (PPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months to 3 years and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the NPPF) to establish the following: • The development's demand for water supply and network infrastructure both on and off site; • The development's demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met.” “Further to the above, we are supportive of the approaches proposed by Policy CP6 to ensure that development is adequately supported by necessary infrastructure and the use of planning mechanisms such as Grampian conditions or planning obligations. The policy states that it is important that developers demonstrate that there is acceptable	A Water Cycle Study has been completed, and the Council will also continue to work with Thames Water to ensure that the required water infrastructure is provided in step with development (see Chapter 6). From the point of view of the HRA, there are no adverse effects on integrity of Habitats Sites, as the safeguards within these policies are sufficient to ensure that development would not be permitted where there is insufficient water supply or wastewater infrastructure capacity; and the policy ensures that demand for infrastructure is minimised. In relation to direct pollution, Policy DM2 has been updated to strengthen the protection of Habitats Sites generally and watercourses upstream. This is sufficient to avoid adverse effects on integrity. The recommendations relating to Policies CP6 and CP7 are for the Council to consider.

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
	wastewater capacity and surface water drainage both on and off-site. However, we request that this also includes adequate water supply and as part of this process encourage developers to contact the water/wastewater company as early as possible to discuss their proposals (as discussed above). The section of Policy CP6 that addresses planning controls should be updated to include: “Ensuring Infrastructure Delivery through Planning Controls To ensure that development is adequately supported by necessary infrastructure, the Council will use planning mechanisms such as Grampian conditions or planning obligations. These mechanisms will ensure that: • Development does not commence or, where appropriate, is not occupied until required infrastructure improvements have been identified, secured, and scheduled for delivery. • Infrastructure provision is phased and delivered in a timely manner to avoid undue pressure on existing local services or amenities. • Developers will be required to demonstrate that there is acceptable water and wastewater capacity and surface drainage both on and off the site to protect new and existing residents. Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements and water/sewage treatment work upgrades. The Council will closely monitor compliance with this policy and work with developers, infrastructure providers, and other stakeholders to ensure that infrastructure delivery aligns with local needs and statutory requirements.” “While we welcome the inclusion of a watercourse policy, CP7 lacks clear recognition of watercourses as ecological assets and fails to address their vital role in biodiversity, flood resilience, and climate adaptation. We recommend either: Renaming and expanding CP7 to reflect this broader scope — e.g.: Proposed new title: “CP7 – Protection and Enhancement of the Water Environment” OR Creating an additional stand-alone policy dedicated to River Corridors and Ecological Buffer Zones, Proposed opening paragraph: “Where spatially relevant, all new development proposals must adopt a sustainable and integrated approach to the water environment, recognising the ecological, hydrological, and climate adaptation roles of watercourses and their riparian corridors. Proposals must protect and enhance the physical and ecological function of	

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
	rivers and support Water Framework Directive objectives. They should maintain undeveloped buffer zones to enable long-term resilience, incorporate Sustainable Drainage Systems (SuDS) to manage surface water sustainably, and support natural floodplain connectivity to reduce flood risk and improve climate adaptation.” “Whether through a new or renamed policy, we strongly recommend that the Local Plan sets out clear requirements for: “Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and condition of any watercourse and its associated corridor. Development should seek to actively conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design and to act upon opportunities to deliver WFD objectives. Development proposals adjacent to or containing a watercourse must provide or retain a buffer zone with a minimum width of 10 metres between the top of the bank and the development. This buffer provision applies to both sides of the watercourse and should be managed for long-term ecological benefit. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. Only native species should be planted within the buffer zone, ideally of local genetic provenance. The buffer zone should be appropriately managed under a scheme agreed (in writing) by the council. This scheme will detail how the buffer zone is to be managed during and following construction, as well as detailing the responsible party(s). All proposed artificial lighting within or adjacent to river corridors must be designed to avoid ecological harm. Lighting should be directional and shielded using cowls (or equivalent) to prevent light spill into the watercourse and buffer zone. In line with the 2023 Bats and Artificial Lighting at Night guidance, light levels in these areas should not exceed 2 lux to reflect natural nighttime conditions and prevent disruption to nocturnal species and fragmentation of wildlife corridors.	
Cotswolds Rivers Trust, Reg18 consultation 2026	“Any policy on the water environment must: 1. Ensure that drainage systems and SuDS are designed to be future proofed and handle more than the expected rainfall. 2. Ensure that a monitoring system is put in place to assess the SuDS and drainage systems following completion of the development to ensure they are working effectively. Too many systems fail to work to the standard that they were designed to. 3. Ensure that a system is put in place to clean out and properly dispose of sediment build up in attenuation ponds.	The policy wording in the plan is sufficient to avoid adverse effects on integrity of Habitats Sites due to water supply/treatment and direct pollution, as above.

Consultee and consultation	Comment (excerpts relevant to the HRA)	How comments have been addressed
	Failure to maintain the system will mean it cannot reach the standard that it was designed to. 4. Acknowledge and take into consideration that smaller developments are causing an additive problem to the issues. 5. Accept that the run off caused by the development when building and when in use will impact the water quality and flooding outside the area of the development. As such support the polluter pays principle. 6. Allow for the drainage and SuDS design to be properly scrutinised by the public, including options for second opinions. 7. Ensure development is not undertaken on or near to a floodplain. 8. See the local council work closer with Highways to tackle road run off issues. 9. Support the use of nature-based solutions for tackling flooding, reducing pollutants and increasing wetland habitat. 10. Make it mandatory that sewerage system can handle the increased volume taking into consideration infiltration and flow rates.”	