

West Oxfordshire Local Plan 2043

Health and Equality Impact Assessment: Draft Regulation 19 Local Plan

West Oxfordshire District Council

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EQUALITY IMPACT CONSULTING LTD



EqualityImpact



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Introduction

Purpose of this report

The West Oxfordshire Local Plan 2043 ('the Plan') sets out a vision for the district, along with objectives and policies to guide and manage future development and land use in the period up to 2043.

West Oxfordshire District Council (The Council) has commissioned Equality Impact Consulting (in collaboration with BirleyHIA) to prepare an integrated Health and Equality Impact Assessment (HEQIA) for the Plan. An initial impact assessment was undertaken at Regulation 18 stage (Plan Preparation) to identify gaps and opportunities to promote positive equality and health outcomes through ongoing option development.

The Council consulted on the Regulation 18 Preferred Policy Options between June and August 2025, supported by the initial HEQIA. Following consultation, the Council has updated the policies and prepared the draft Regulation 19 Local Plan.

The Council is now at the Regulation 19 (Publication) stage and is currently undertaking a six week period of formal public consultation before submitting the Plan for examination. This HEQIA assesses the draft Regulation 19 Plan and incorporates relevant evidence and feedback from the Regulation 18 consultation and subsequent engagement.

The need for Health and Equality Impact Assessment

A Health Impact Assessment (HIA) is a tool used to identify the health impacts of a plan or scheme and to develop recommendations to maximise positive impacts and minimise negative impacts. The HIA approach focuses on the wider determinants of health, whilst maintaining a focus on addressing health inequalities.

As a public sector organisation, the Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the emerging Local Plan does not lead to unlawful discrimination (direct or indirect), that it advances equality of opportunity and that it fosters good relations between those with a protected characteristic¹ and all others. An Equality Impact Assessment is a useful tool to demonstrate how due regard has been paid to the PSED.

Although a HEQIA is not a legal requirement, it provides an important contribution to plan and policy development by identifying actions that enhance health, wellbeing and social equity. It forms part of a wider evidence base for the Local Plan, alongside assessments of social, economic and environmental impacts. The purpose of this report is to:

- Assess the vision, objectives and policies in the draft Regulation 19 Local Plan, identifying their potential impacts on health, wellbeing and equality.

¹ Protected characteristics are age, sex, disability, race, religion, sexual orientation, gender reassignment, pregnancy and maternity, and marriage and civil partnership.

- Evaluate how far the Council has addressed the gaps and opportunities identified at Regulation 18, and whether health and equality considerations have been integrated into the updated policies, including how consultation feedback has informed policy development.
- Identify any remaining cross-cutting issues relating to health outcomes or advancing equality of opportunity.
- Provide final recommendations to support the Council in meeting the requirements of the Public Sector Equality Duty and in maximising health gain prior to submission of the Plan for examination.

The approach

This report should be read alongside the Local Plan 2041 Health and Equality Impact Assessment: Scoping Report which sets out the evidence base for the assessment and the approach based on the Oxfordshire HIA toolkit². The Scoping Report was initially prepared in June 2025; therefore, new evidence and consultation feedback provided after this date have been incorporated directly into this report.

The HEQIA is structured around the following HIA toolkit themes, reflecting key determinants of health and equality:

- Traffic and Transportation;
- Economy and Employment;
- Air quality;
- Noise;
- Healthy food environments;
- Physical activity;
- Crime and anti-social behaviour;
- Education and Skills;
- Local natural environment and access to green spaces;
- Housing; and
- Access to Services.

² Oxfordshire HIA Toolkit <https://www.oxfordshireleaders.org.uk/partner-projects/oxfordshire-health-impact-assessment-toolkit>

Consultation

Regulation 18 Preferred Policy Options consultation

This section summarises the consultation process and highlights the key health and equality issues arising from the feedback received. The Preferred Policy Options consultation was the third of three Regulation 18 stage consultations undertaken by the Council:

- An initial scoping consultation (August 2022);
- The 'Your Place, Your Plan' consultation on draft objectives, patterns of development and potential sites (August 2023); and
- The Preferred Policy Options consultation (June to August 2025)

Consultation approach

The Preferred Policy Options consultation ran for six weeks from 26 June to 8 August 2025 and comprised the Plan and supporting documents hosted on the Council's digital engagement platform as well as nine in-person public exhibitions held across the district in Bampton, Long Hanborough, Chipping Norton, Carterton, Burford, Woodstock, Eynsham, Witney and Charlbury. The Council received almost 1,500 comments from around 400 individuals and organisations.

The different approaches allowed participation for people who are not online as well as those who prefer digital engagement, and the exhibitions were spread across the district's main towns and larger villages, reducing travel barriers for rural residents. Statutory and representative bodies engaged with health and equality interests including NHS bodies, NHS Property Services, Sport England, the Cotswolds National Landscape Board and numerous town and parish councils contributed detailed responses.

However, the process raised some issues:

- Some respondents reported that the process felt confusing, inaccessible and not transparent, 'especially for elderly or digitally excluded residents', and that the 268-page consultation document was too long and complex for meaningful public engagement. Recommendations from respondents included a clear executive summary, simplified language and improved consultation tools and accessibility.
- The Summary Report does not present any equalities monitoring information about who responded. It is therefore not possible to establish whether people with protected characteristics for example younger people, disabled people, ethnic minority groups or Travelling communities were proportionately represented among the approximately 400 respondents, or how their views compared with those of the wider respondent base.
- No targeted engagement with specific protected characteristic groups (for example children and young people, disabled people, Gypsy, Traveller and Travelling Showpeople communities, or faith groups) is described in the Summary Report, although several policies under consultation directly affect these groups.

- Around 400 respondents represents a very small, self-selecting proportion of the district's population, and the pattern of responses (with strong representation from parish councils, landowners, developers and established local groups) suggests that seldom-heard voices are likely to be under-represented.

For the Regulation 19 consultation, it is recommended that the Council provides an accessible executive summary and plain-language materials (including easy-read, large print and paper formats on request). It should also undertake and publish equalities monitoring of respondents and carry out targeted engagement with under-represented protected characteristic groups, including young people, disabled people, faith communities and Travelling communities. This activity should be documented so that due regard to the PSED can be clearly demonstrated.

Consultation feedback

The Consultation Summary Report sets out detailed feedback from the Preferred Policy Options consultation. Much of the feedback received strongly aligns with the determinants of health and several of the gaps identified in this assessment. The key points are summarised below:

- **Infrastructure and access to healthcare (Themes 8 and 11):** There is huge concern regarding infrastructure (particularly water/sewage/public transport/schools/healthcare) lagging behind development and there are calls for infrastructure to be in place first/Grampian Conditions applied, particularly in Tier 3 settlements. Comments insist that developers must be held accountable for delivering promised infrastructure. NHS comments stressed that health infrastructure to be treated as essential, with dedicated provision for healthcare contributions.
- **Health Impact Assessments (Theme 6 and cross-cutting):** There were mixed views on requiring a Health Impact Assessment (HIA) for all major developments, with some supporting them as essential for embedding health in planning, while others argue they duplicate work already done in the Local Plan.
- **Transport and rural equity (Theme 1):** Feedback showed strong support for sustainable transport. However, there is strong consensus that private cars remain essential in rural West Oxfordshire due to poor public transport coverage, long distances to services and inadequate cycling infrastructure. Roads such as the A40 were described as dangerous, and cycling considered impractical for older or less mobile residents. Suggestions with positive equality potential included demand-responsive transport, free bus travel for under-25s, safe inter-village cycle routes, and the explicit addition of 'wheeling' (for wheelchair users and mobility aids) alongside walking and cycling directly supporting this HEQIA's recommendation on wheeling infrastructure.
- **Healthy food environment (Theme 5):** there was community support for allotments, community growing and local food systems, but developer-side feedback questioned the evidence for the 10-minute walk standard for access to healthy food outlets and described the takeaway and food-retail provisions as going beyond what planning can control. This feedback has contributed to the removal of the hot food takeaway restrictions and food retail access requirements included in the Regulation 18 Plan and an approach to take a strategic approach to improving access to healthy food at the district level.
- **Housing (Theme 10):** there was broad support for the 40% affordable housing benchmark, alongside developer viability challenges; one respondent called for affordability to be linked to income ratios, noting house prices at nearly 11 times average earnings and over 2,100 households on the housing register. The M4(2)/M4(3) accessible housing standards attracted support in principle but sustained developer

pressure for flexibility and viability testing. The retention of these standards (with a quantified minimum 5% M4(3) requirement) in Policy DM19 is therefore an important equality safeguard to defend. Respondents also highlighted the loss of affordable stock to short-term holiday lets and sought affordable housing for NHS and care staff near healthcare facilities.

- **Travelling communities (Theme 10):** supportive comments recognised the distinct needs of Travelling communities and the importance of access to healthcare, education and essential services. Developer feedback objected to the requirement for strategic sites to include traveller accommodation, arguing that need should be met through specific site allocations, and sought clearer flood-safety criteria for sites. Care is needed to ensure that any move away from strategic-site provision does not delay delivery of the 36 pitches now quantified in Policy DM24, given the acute health and education inequalities experienced by these communities.
- **Community facilities, faith and inclusion (Themes 7 and 11):** There was strong support for protecting pubs, churches, healthcare centres, libraries and shops, including an explicit request to name 'churches and buildings for faith and worship' among protected facilities (now reflected in Regulation 19 Policy DM15). Respondents also called for community centres in larger developments and a stronger focus on young people's needs, including youth centres, Multi-Use Games Areas and recreational spaces.
- **Education, skills and a just transition (Theme 8):** respondents supported apprenticeships, volunteering and partnerships with social enterprises, and asked for early years and lifelong learning to be included, together with skills for low-carbon construction and retrofit – reinforcing the HEQIA's recommendations on adult education and green skills. Developer feedback described the Community Employment Plan requirement as onerous for smaller sites, which has informed the Regulation 19 change to Community Employment and Skills Plans required only for large and strategic scale development.
- **Physical activity (Theme 6):** Sport England and others sought up-to-date needs assessments and protection for the full range of facilities; one respondent specifically requested that recreational and play facilities be designed for 'all ages, genders, and abilities, ensuring inclusivity', and that deficits in densely populated areas be prioritised.
- **Digital inclusion (Themes 2 and 11):** respondents highlighted that mobile infrastructure is often the only viable solution for remote communities and warned that refusing permission for masts risks leaving rural communities digitally excluded – relevant to older people, disabled people and those relying on home delivery of goods and services identified in this assessment.
- **Wellbeing and place (cross-cutting):** respondents linked failure to meet affordable housing needs to severe health impacts, especially for children and young people. Concerns were raised about the mental and physical wellbeing impacts of large-scale development on existing rural communities. There was support for accessible green space, walking maps, communal food growing, biophilic design, intergenerational planning and social prescribing.

Overall, the consultation feedback aligns with the gaps identified in this assessment including rural access to services, inclusive design, the needs of young people, digital inclusion and pressure on local infrastructure. Where viability-led feedback has resulted in the weakening or removal of health-protective provisions in the Regulation 19 draft (most notably the healthy food environment provisions), the Council should record how the equality impacts of those changes have been considered, in order to demonstrate due regard to the PSED.

Theme 1: Traffic and Transportation

Baseline
- Rural areas of the district have limited public transport options and infrastructure for active travel. As such, car dependency and car ownership rates are high with over 88.5% of households having at least one car. Residents reported that public transport availability has declined in some rural areas, with bus services remaining infrequent or absent. - There are high congestion levels on key strategic roads including the A40. Consultation feedback consistently highlighted severe congestion on the A40, with residents reporting that recent improvements have been negated by surrounding development.
Evidence
- Sustainable travel provides access to key services such as employment, education, healthcare, shopping and recreation, especially for those without access to a car. Groups who are more likely to rely on walking, cycling and public transport include women, children, young people, older people, disabled people, certain ethnic minority groups and those from low income households. - Active travel infrastructure can contribute to positive health and wellbeing outcomes through increased physical activity and improvements in air quality, if the uptake in active travel is matched by a reduction in private vehicle use. Active travel also includes 'wheeling' (wheelchairs, mobility aids, powered mobility devices), which is essential for an ageing population and disabled residents. - Barriers to active travel include lack of accessible infrastructure for adapted cycles, wheelchairs and mobility scooters all of which are important for an ageing population. - Safety and security issues may also be a barrier to travel among some groups who may feel unsafe walking and cycling in more remote, unlit areas or travelling in the dark. For example, women, older people and disabled people. Children and older people are more vulnerable to being a pedestrian casualty of a road traffic accident.

Health and Equality Effects - Traffic and Transportation				
Considerations	Status in Reg 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Introduction of sustainable transport options and incentives	Addressed	Addressed	- Policy CP8 (Sustainable and Integrated Transport) and Policy DM16 (Active and Healthy Travel) require the creation of safe, direct, accessible and attractive active travel routes for new developments. - Policy DM17 (Parking Standards) requires high-quality cycle parking including for e-bikes and adapted cycles. - Policies DM14 (Town Centres) and DM5 (Efficient Use of Land) promote sustainable transport and	✓ Increased sustainable transport can benefit all groups, but especially those on lower incomes, women, children, young people and older people. Accessible design of active travel networks and public transport infrastructure is required for those with mobility impairments, mobility aids and pushchairs. ✓ Reducing transport-related carbon emissions has a potential positive impact on groups who are more vulnerable to the adverse health impacts of air pollution.

Health and Equality Effects - Traffic and Transportation				
Considerations	Status in Reg 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			public transport connectivity in town centres and previously developed land. • Area Strategies promote active and sustainable modes of travel and provision of infrastructure, for walking, cycling and wheeling particularly in town centres and key employment areas.	This includes children, older people, disabled people and pregnant women.
Speed reduction measures	Missing	Partially Addressed	• Policy DM16 and Area Strategies include requirements for traffic calming, pedestrian priority spaces and safe crossing points, but lack specific detail on designing for lower speeds (e.g. 20mph limits).	✓ Traffic calming, safer crossings and pedestrian priority can support active travel and reduce road safety risks for vulnerable groups. ✗ High traffic speeds can disproportionately impact children, older people, and disabled people, who are more vulnerable to road danger. This creates both real and perceived barriers to active travel.
Reducing the need to travel, particularly by car	Addressed	Addressed	• Policy CP8 discourages reliance on private vehicles through site layout, infrastructure, and design measures. • Policy DM15 (Community Facilities and Services) helps retain local services, reducing the need to travel. • Policy DM17 supports car-free and low-car developments with access to public transport. This includes regard to inappropriate parking • Policy DM31 (Supporting Digital Infrastructure and Connectivity) supports home-working.	✓ Retaining community facilities is vital for those with mobility restrictions, including older and disabled people as well as those for whom affordability of transport is a barrier to travel and access services. ✓ Reducing the need for travel benefits lower-income households, especially where travel costs form a disproportionate amount of household budgets. ✗ Policies involving the reduction of parking may disproportionately impact those without a blue badge, including some carers and those making vital deliveries. However, the policy wording reflects the need to avoid 'inappropriate' parking and, as such, the potential for this to be considered within new developments.
Provision or enhancement of the public transport network	Partially Addressed	Partially Addressed	• Policy DM16 requires active travel routes to connect to public transport hubs. • Policies DM14 and DM5 promote public transport connectivity in town centres and previously developed land. Area Strategies support improved public transport connections, particularly to town centres, key employment areas and rail stations.	✓ Reliable public transport is important for reducing transport poverty and social isolation, especially amongst older people, young people, disabled people, and those on low incomes. ✓ The replacement of the safeguarded rail corridor with the A40 MRT corridor means that benefits for those without

Health and Equality Effects - Traffic and Transportation				
Considerations	Status in Reg 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			Policy SP5 (A40 Mass Rapid Transit (MRT) Corridor) replaces the previously safeguarded rail corridor with a flexible MRT solution on the A40 corridor, supported by mobility hubs.	access to a car will depend on the delivery of MRT and mobility hubs x Public transport infrastructure and services may require developer funding and ongoing subsidies to be maintained in rural areas. Loss of services due to funding issues may have a negative impact on rural communities in the long-term.
Provision or enhancement of sustainable travel facilities	Addressed	Addressed	- Policy DM16 is dedicated to providing infrastructure for walking and cycling and protecting existing travel infrastructure including public rights of way. This includes segregation, accessibility improvements, lighting and traffic calming. - Policy DM17 mandates secure cycle parking and EV charging points. - Policies DM14 and DM5 promote sustainable transport and public transport connectivity in town centres and previously developed land. Area Strategies support proposals to enhance walking and cycling infrastructure including safe routes to schools.	✓ The provision and protection of active travel infrastructure could result in the uptake of active travel, improving health and mental wellbeing outcomes. ✓ Safe, well-lit routes are particularly important for the safety of women, children, and people from minority ethnic or LGBTQ+ groups. Accessible design of facilities is critical for disabled people.
Needs of people who are car dependent	Partially Addressed	Partially Addressed	- Policy DM17 requires accessible parking for Blue Badge holders. - This policy includes specific provisions for parking in rural areas, recognising limited alternatives to the car. - The Plan does not specifically address how home deliveries and carer services using vehicles might be accommodated in new developments.	✓ In rural areas, older people and disabled people often have no alternative to the car for accessing essential services. x Policies must ensure that reducing general car dependency does not inadvertently increase rural social isolation by making it difficult for delivery vehicles or carer services to visit vulnerable people.
Needs of people without access to a car	Addressed	Addressed	Policy DM15 supports the delivery of new or enhanced community facilities where they are well located, within or adjacent to existing settlements and accessible by walking, cycling, and public transport	✓ Protecting existing active travel infrastructure helps to maintain existing facilities for those who do not have access to a car. This includes protected characteristic groups such as children, young people, women, ethnic minority groups and older people

Health and Equality Effects - Traffic and Transportation				
Considerations	Status in Reg 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			- Policy DM16 is dedicated to protecting existing infrastructure (including Public rights of Way) and providing new infrastructure for walking, cycling and other active travel modes. - Policy SP5 supports Mass Rapid Transit on the A40 corridor in place of the previously safeguarded rail corridor to Oxford. Policy DM31 (Supporting Digital Infrastructure and Connectivity) supports improved digital access, which is essential for residents who rely on online information, booking systems, remote working and home deliveries where physical transport options are limited.	✓ Policies to promote active travel infrastructure could potentially have a positive impact on groups with protected characteristics with regards to improving access to key services such as education, healthcare, employment, shopping and recreational activities.

Summary and recommendations
CP8 (Sustainable and Integrated Transport) and DM16 aim to reduce car dependency and increase sustainable travel infrastructure. These policies and other supporting policies listed above may contribute to a range of positive health and wellbeing outcomes including increased physical activity, cleaner air and improved access to essential services such as healthcare, education, employment and leisure. These outcomes are likely to benefit protected characteristics groups that are more vulnerable to the adverse health impacts of air pollution, lack of physical activity, and the affordability and accessibility of car ownership/usage. This includes children, young people, older people, disabled people, some ethnic minority groups and women. However, positive health and equality outcomes will depend on how well policies are supported by wider Council and partner strategies. For example, behavioural change strategies, public transport investment, ticketing and fare strategies, parking controls and digital investment. In rural West Oxfordshire, where many rely on private cars, it's also essential to ensure that sustainable travel routes are accessible, well located and designed to address mobility, affordability or confidence-related barriers. Policy recommendations: - Policies DM16 and DM17 should consider inclusive design standards for active travel infrastructure and parking to address mobility issues experienced by groups such as disabled people and older people. Segregated infrastructure would benefit people who are more likely to lack confidence or are underrepresented amongst cyclists, such as women. - In line with the Area Strategies, Policies DM16 and DM17 could specifically reference other 'wheeling' options beyond walking and cycling. This includes manual, self- or assistant-propelled wheelchairs, wheelchairs with power attachments or all-terrain attachments, powered wheelchairs, mobility scooters and e-scooters. This includes consideration of infrastructure, crossings, and secure and accessible storage, parking and charging facilities in new developments³.

³ Active Travel Definitions: Walking/Wheeling, and Cycling <https://wheelsforwellbeing.org.uk/walking-wheeling-and-cycling-definitions/>

- 20mph speed limits are currently in place across parts of the district. Policy DM16 now includes traffic calming and safe crossing point requirements. However, it is recommended that specific speed reduction measures (e.g. 20mph limits) are also referenced as a means of improving the environment for active travel and public transport users.
- Policies should accommodate deliveries of goods and services as part of planning processes i.e. through safe, temporary parking provision of goods/service provider vehicles, internet infrastructure, design measures that enable door-step delivery, parcel lockers etc. (relevant policies may include policies **CP4**, **DM31** and **Area Strategies**).
- Policy **DM17** could include requirements for other vehicles that help to reduce dependency on car ownership in rural areas. For example, short-term parking, drop off and pick up points and EV charging points for shared and community transport services and taxis.
- Policies currently do not explicitly require developer contributions towards the enhancement of public transport infrastructure or services. This should be considered in combination with future funding to support long-term viability of rural services.

Supporting assessments, plans and mitigation

- Oxfordshire Local Transport and Connectivity Plan⁴

⁴ <https://www.oxfordshire.gov.uk/transport-and-travel/connecting-oxfordshire/ltcp>

Theme 2: Economy and Employment

Baseline
- Unemployment levels are low in West Oxfordshire (2%) in comparison to Oxfordshire and national rates. However, young people are more likely to be claiming benefits and be unemployed as are people from certain ethnic minority groups. 97.8% of businesses in the district are classified as small or micro-sized, while only 0.2% are large enterprises. - The West Oxfordshire workforce is highly skilled with 25% of residents in professional occupations. - There are 47,000 jobs in the district with significant manufacturing, construction, retail, and tourism sectors. There is potential for growth in existing firms in engineering, motorsport and food production. The socio-economic profile highlights skills mismatches in some sectors, reinforcing the need for targeted training and upskilling. - Future demand modelling indicates a need for additional employment land to support growth sectors and accommodate expanding businesses⁵.
Evidence
- Unemployed people have a greater risk of poor health than those in employment, contributing to health inequalities⁶. Those in more disadvantaged socioeconomic positions are more likely to be unemployed than those in more advantaged positions. - Approximately 20% of UK employees are in sectors such as energy, construction, and waste and resources management which will see the biggest changes from the net zero transition over the next decade. By 2030, between 135,000 and 725,000 new jobs could be created in these sectors. A further 20% of workers are in enabling sectors, such as teaching and finance⁷. - Barriers to employment include childcare, lack of skills and training and transport availability. - Digital connectivity is increasingly important for accessing employment, training and remote work opportunities. The Economic Needs Assessment and consultation feedback highlighted that digital exclusion remains a barrier for some rural and low-income households. - Childcare availability and affordability remain significant barriers to employment, particularly for women, single parents and low-income households.

Health and Equality Effects – Economy and Employment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Development Policies	Potential health and equality effects
Access to relevant and skills-specific	Addressed	Addressed	Policy DM29 (Learning, Skills and Training Opportunities) requires large and strategic scale	✓ Policies to improve access to skills specific employment and training opportunities can help young people and

⁵ AECOM (2025) West Oxfordshire Economic Needs Assessment <https://westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2043/>

⁶ The Marmot Review Team. Fair Society, Healthy Lives: Strategic review of health inequalities in England post 2010. London: Marmot Review Team, 2010. <https://www.instituteofhealththequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review>

⁷ P. Simmonds, C. Lally (2024) UK Parliament Research Briefing: Green skills for education and employment <https://post.parliament.uk/research-briefings/post-pn-0711/>

Health and Equality Effects – Economy and Employment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Development Policies	Potential health and equality effects
employment and training opportunities			developments to submit Community Employment and Skills Plans (CESPs) focusing on apprenticeships and training, with major development strongly encouraged to do so.	those needing to reskill. This can also include women returning to the workforce or disabled people seeking supported employment.
Provision of a diversity of job opportunities	Addressed	Addressed	• Policy CP3 (Economic Growth and Local Prosperity) provides an overarching framework for the amount of employment land and floorspace. • Policy DM27 (Provision and Protection of Land for Employment) supports a range of employment types. • Policy DM28 (Supporting the Rural Economy) encourages farm diversification. • DM28 and DM31 support flexible and home-based enterprise. • Area Strategies support proposals that strengthen the evening economy of settlements and support mixed-use development.	✓ A diverse local economy provides more opportunities for all, particularly women (who are more likely to seek part-time or flexible work), and can reduce out-commuting. ✓ Policies support the creation of local employment opportunities to reduce reliance on commuting, particularly for younger working-age residents. This matters because unemployment rates are highest among young people. ✗ Those working in agriculture, manufacturing, transport and construction may be more at risk of losing jobs as a result of net zero policies. Groups such as young men and ethnic minority groups may be disproportionately represented in these sectors and at higher risk of losing employment or business without the right training and qualifications to support them through the transition to green jobs. The Council will need to consider supporting policies and programmes to address this risk.
Provision of accessible employment opportunities appropriate to the skill sets present in local community	Addressed	Addressed	• Policy DM29 requires developers to produce CESPs to maximise local labour and engage with local schools and colleges to align opportunities with the community. • DM31 (Supporting Digital Infrastructure and Connectivity) helps to improve access to remote work, digital train and online job applications. • Policy CA1 supports new developments that support enterprise sectors complementary to the skills base at RAF Brize Norton.	✓ Directly tackles a key driver of health inequality by connecting local people to local jobs, benefitting young people and reducing economic disparities. ✓ Policies support the creation of local employment opportunities to reduce reliance on commuting, particularly for younger working-age residents. ✗ The Economic Needs Assessment identifies constraints in the supply of modern employment land and premises, which may limit opportunities for business growth and local job creation.

Health and Equality Effects – Economy and Employment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Development Policies	Potential health and equality effects
Provision of childcare facilities and other employee support services	Missing	Partially Addressed	• DM15 focuses on the protection of existing social uses and the provision of childcare facilities in new multi-functional community spaces. • However, no DM policies explicitly requires the provision of childcare facilities alongside new employment or major residential development.	✗ Lack of affordable childcare is a primary barrier to employment, disproportionately affecting women, those with babies and young children, and single-parent households. This can create poverty and stress, with direct negative health consequences.
Supporting business start-up, development and survival	Addressed	Addressed	• Policy DM27 (Provision and Protection of Land for Employment) and DM28 support small business and the provision of co-working or shared workspace where appropriate to the scale and location of development. • Area Strategies support provision of flexible space to support start-ups, creative industries and small businesses.	✓ Supporting local start-ups can foster a more inclusive economy, creating opportunities for women, young people, and people from diverse ethnic backgrounds who are highly represented in the SME sector.
Provision of a safe and pleasant biophilic working environment	Addressed	Addressed	• Policy SP3 (Key Development Principles) establishes amenity standards. Policies DM1 (Green Infrastructure), DM2 (Ecological Protection, Biodiversity Net Gain and Nature Recovery) and DM6 (Trees and Hedgerows and Woodland) ensure green, biodiverse settings.	✓ A high-quality working environment has universal mental and physical health benefits and is crucial for the inclusion of disabled people. Biophilic design is proven to reduce stress.
Creating an attractive business location that encourages investment	Addressed	Addressed	• Policies covering design and heritage (DM3, CP9, DM26), environment (DM1, DM2, DM13), and infrastructure (DM29, DM31) work together to promote attractive business locations. • Area Strategies support proposals that strengthen the evening economy, tourism industry, heritage and arts and enhance town centre public realm.	✓ Policies benefit the whole community through a stronger, more resilient local economy.
Just transition for skills and employment	Partially Addressed	Partially Addressed	• Policy DM29 requires developers to produce CEPs. However, this does not specify a requirement for	✗ Policies addressing climate change and zero-emissions developments are likely to result in a transition of jobs and skills across different sectors. The existing workforce

Health and Equality Effects – Economy and Employment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Development Policies	Potential health and equality effects
			supporting development and training in green construction skills. Policy CA1 support new developments that support enterprise, including emerging low-carbon industries.	will need to be reskilled to benefit from new opportunities. ✓ However, new job opportunities can be shared by underrepresented groups such as women and disabled people, if policies are supported by appropriate recruitment and training opportunities.

Summary and recommendations
The above policies are aimed at supporting the local economy and employment by diversifying business use, improving working environments, supporting small businesses and promoting jobs, skills and training for local people. This can create positive health and wellbeing outcomes through more diverse local job opportunities. Such benefits can be shared by groups who may be over-represented in unemployment figures or may find it difficult to commute due to cost, time or mobility barriers. This includes young people, women, disabled people and certain ethnic minority groups. However, policies should consider how economic growth and local prosperity align with objectives to tackle climate change and support the just transition of employment, skills and training opportunities. Additionally, there is a need to consider barriers to employment for those who rely on childcare facilities. Policy recommendations: - Policies supporting economic growth should consider transition principles in the move to a net zero society. Policy DM29 should have some focus on opportunities for those employed in carbon-intensive industries to re-skill/upskill for jobs in the green economy. - Planning of childcare facilities within new developments is not currently mentioned within the policies. A requirement for dedicated on-site provision or financial contributions to require that proposals for major residential or employment development provide for the childcare needs would help to remove barrier to employment. - Policies DM31 and DM23 could consider the inclusion of shared workspaces within housing developments to provide more options to work from home.
Supporting assessments, plans and mitigation
- West Oxfordshire Economic Needs Assessment (June 2025) - Town Centre Strategy and Needs Assessment. - Development proposals will be required to produce a Community Employment and Skills Plan (CESP).

Theme 3: Air Quality

Baseline
- There are two AQMAs within West Oxfordshire: Chipping Norton AQMA and Witney AQMA. However, both areas have seen a reduction in emissions since 2020 and have been below the national objective for nitrogen dioxide concentrations. - PM2.5 is recognised as a key pollutant of concern under the Environment Act 2021. While West Oxfordshire does not currently exceed national PM2.5 targets, exposure remains a health risk, particularly near major roads. - Consultation feedback highlighted ongoing concerns about traffic-related air quality in Witney and Chipping Norton, despite recent improvements.
Evidence
- Poor air quality is one of the main environmental risks to public health contributing to a range of health effects such as low birth weight, asthma, development problems, coronary heart disease, diabetes, lung development issues/lung cancer, dementia, strokes, heart attack and heart failure. - Air quality related disease is unevenly distributed, often disproportionately affecting the most vulnerable and susceptible groups such as low income households and ethnic minority groups or those that are more susceptible such as older people, disabled people, children and pregnant women⁸. - Air quality impacts can be created through construction of new developments (especially major developments) and traffic (including through emissions from construction traffic). Exposure is often higher for households and schools located near busy roads or major transport corridors. - Indoor air quality can also be affected by external pollution, particularly in homes near major roads or in poorly ventilated buildings.

Health and Equality Effects – Air Quality				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Air pollution caused by traffic (during both construction and operation)	Addressed	Addressed	- Policy DM16 is dedicated to creating and enhancing active travel networks, which can help to reduce transport emissions. - Policy DM13 (Air Quality and Pollution) is a comprehensive policy requiring Air Quality Impact Assessments (AQIAs), mitigation, Construction Environmental Management Plans and monitoring for developments, with specific reference to AQMAs and the Oxford Meadows SAC.	✓ Reducing traffic related emissions has the greatest health benefit for groups who are more susceptible to poor air quality. These include children, older people, pregnant women and those with pre-existing conditions (disabled people). ✓ The requirement for AQIAs in areas with highest levels of air pollution and highest traffic increases is likely to focus benefits for the most vulnerable communities.

⁸ World Health Organisation (2021) WHO Air Quality Guidelines <https://iris.who.int/handle/10665/345329>

Health and Equality Effects – Air Quality				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Provision of green infrastructure to protect sensitive receptors	Addressed	Addressed	Policy DM1 (Green Infrastructure) and DM6 (Trees and Hedgerows and Woodland) require the provision of green infrastructure networks and planting, which function as natural barriers to pollution.	✓ Green barriers are most critical in protecting sensitive locations like schools (children) and care homes (older people, disabled people).
Construction impacts such as dust and odours	Addressed	Addressed	Policy DM13 explicitly requires developers to submit Construction Environmental Management Plans (CEMPs) to control dust and other construction-phase emissions.	✓ This is important for protecting the respiratory health of nearby residents, particularly older people, children, and disabled people who are more sensitive to dust. However, CEMPs should specifically consider vulnerable groups or areas in the proximity of the proposed development.
Provision of parking spaces	Addressed	Addressed	Policy DM17 manages parking provision to discourage excessive car use, thereby reducing associated emissions. It also includes requirements for EV parking.	✓ Reducing car-dependency benefits everyone's health. Care must be taken to ensure sufficient, conveniently located Blue Badge parking is provided for disabled people.
Opportunities to increase active travel	Addressed	Addressed	Policy DM16 is dedicated to creating and enhancing active travel networks, which directly reduces transport emissions.	✓ Active travel can benefit all groups. Safe and accessible design is key to ensuring uptake among women, children, older people, and disabled people.
Proximity of residential units to industrial uses, or uses generating dust or other particulate matter	Addressed	Addressed	Policy SP3 (Key Development Principles) requires development to be compatible with adjoining uses and to provide a high standard of amenity. Policy DM13 requires AQIAs where new development could be impacted by existing pollution sources.	✓ This provides a mechanism to prevent environmental injustice, particularly as lower-cost housing is disproportionately located near polluting sources. Such housing is often occupied by people on lower incomes, from certain ethnic minority groups, or disabled people.
Domestic fuel sources	Addressed	Addressed	Policy DM9 (Net Zero Carbon Development) mandates that all new development must be fossil-fuel free, eliminating a key source of domestic air pollution (e.g. NOx from gas boilers).	✓ A reduction in domestic air pollutants can have a significant positive impact on indoor and local air quality, benefiting all residents, particularly children and those with respiratory conditions (disability).
Agricultural development	Partially Addressed	Partially Addressed	Policy DM13 is a general policy that could be applied to agricultural sources but does not explicitly mention this.	✗ Agricultural emissions (e.g., ammonia, odours) can affect the health and amenity of those living in rural areas, who may include a higher proportion of older people.

Health and Equality Effects – Air Quality				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			Policy DM28 (Supporting the Rural Economy) focuses on economic but not environmental impacts.	

Summary and recommendations
Policies CP8 and the development policies outlined above include a range of measures such as green infrastructure, construction environmental management plans, AQIAs and net zero carbon development to improve air quality and mitigate against development and traffic-related emissions. Such measures may benefit groups such as disabled people, older people and children and pregnant women, who are most vulnerable to the adverse health effects of air pollution. The benefits of reducing traffic emissions are likely to be dispersed across the district and local to new developments. As a result, the extent to which wider benefits will be realised will depend on how areas with the highest levels of air pollution or vulnerable groups are affected. New developments could also result in increased traffic levels in some areas/routes in the district which could have an adverse impact on health due to increased emissions. Policy DM13 addresses this issue by requiring all major developments within or near an AQMA and those likely to result in a significant increase in traffic to produce an AQIA (which can include sustainable transport options). Policy recommendations: - Given the health risks associated with PM2.5, policies should ensure that AQIAs consider particulate matter as well as NO₂. Policy DM13 or DM28 should be strengthened to explicitly state that proposals for new or significantly expanded agricultural operations (e.g., intensive livestock units) must be accompanied by an assessment of their potential impacts on air quality and local amenity. - Consider the potential for Policy DM13 to include requirements to support the reduction of vehicles travelling through the AQMAs through transport planning measures, additional sustainable and public transport measures, emissions zones, additional EV parking etc.
Supporting assessments, plans and mitigation
Oxfordshire County Council Air Quality Strategy 2023 -2030⁹

⁹ [https://mycouncil.oxfordshire.gov.uk/documents/s65892/CAB_230523 Air Quality Strategy Annex 1.pdf](https://mycouncil.oxfordshire.gov.uk/documents/s65892/CAB_230523%20Air%20Quality%20Strategy%20Annex%201.pdf)

Theme 4: Noise

Baseline
- Road traffic noise is greatest along strategic roads in the district, including the A40. RAF Brize Norton is a further source of noise. Consultation feedback highlighted concerns about traffic noise on the A40 and aircraft noise from RAF Brize Norton, particularly for nearby communities. - Road-based Noise Action Planning Important Areas (NIAs) are located within the district, including in Witney, along the A44 at Woodstock and along the A40 at Eynsham and Burford¹⁰. - Construction activity associated with major development can generate temporary noise impacts, particularly affecting nearby residential areas.
Evidence
- Noise impacts on health include annoyance and sleep disturbance, cardiovascular disease, ischaemic heart disease and heart attacks. There is also some evidence on metabolic impacts, for example diabetes¹¹. Research suggests that in 2018, 130,000 healthy life years were lost in the UK due to noise pollution; and that 40% of the population were exposed to harmful levels of noise pollution from road traffic¹². WHO guidance identifies road traffic noise as the largest environmental noise source affecting health in Europe, with recommended thresholds to protect sleep and cardiovascular health¹³. - Some groups are more susceptible to negative effects of noise pollution, for example those who are at home more during the day, such as older people, disabled people, carers, people working from home and people who work night shifts. Children are more susceptible to noise from traffic and construction-related activities. Cumulative exposure to multiple noise sources (road traffic, aircraft, construction) can increase health risks, particularly for vulnerable groups. - Noise pollution is associated with increased stress, reduced concentration, and poorer mental wellbeing.

Health and Equality Effects - Noise				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Noise pollution caused by traffic (during both construction and operation)	Partially Addressed	Partially Addressed	SP3 (Key Development Principles) lists noise among the impacts to be mitigated for new development proposals.	✓ Mitigation for noise can provide positive health and wellbeing benefits for those most likely to be affected by traffic noise, including children, older people, and disabled people with sensory sensitivities.

¹⁰ DEFRA (2026) Noises Action Planning Important Areas Round 3 England <https://www.data.gov.uk/dataset/948d6c4c-772e-4f55-9f39-97508e1cc701/noise-action-planning-important-areas-round-3-england>

¹¹ House of Lords Science and Technology Committee *The neglected pollutants: the effects of artificial light and noise on human health* (2nd Report, Session 2022-23, HL Paper 232). <https://policymogul.com/parliamentary-record/hansard-content/44453/artificial-light-and-noise-effects-on-human-health-science-and-technology-committee-report-?topic-id=none#contribution-EBB7F85F-17F7-4FF0-8099-6DB707E4DD9C>

¹² B Fenech and G Rodgers (2019) Proceedings of the International Congress on Acoustics, ISSN: 2415-1599, Vol: 2019-September, Page: 7137-7144

¹³ WHO (2019) Environmental noise guidelines for the European Region <https://www.who.int/europe/publications/i/item/9789289053563>

Health and Equality Effects - Noise				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			• Policies aim to reduce traffic and promote active travel (CP8 and DM16) and DM1 (Green Infrastructure) and DM6 (Trees and Hedgerows and Woodland) could all help to reduce noise levels.	✓ New developments may result in construction- or traffic-related noise impacts. These are likely to have differential effects on groups more vulnerable to adverse health effects or those who spend more time indoors.
Inclusion of design measures that minimise the impact of noise	Partially Addressed	Partially Addressed	• Policy SP3 requires a high standard of amenity and now explicitly lists noise among the impacts that must be mitigated. However, there is no dedicated noise policy for designing new homes. • DM1 (Green Infrastructure) and DM6 (Trees and Hedgerows and Woodland) could all help to reduce noise levels through the use of green infrastructure as noise barriers in design proposals	✓ Minimising noise impacts can provide positive health and wellbeing benefits for those most likely to be affected by the impacts, including children, older people, and disabled people with sensory sensitivities. ✗ A lack of adequate acoustic design in homes can lead to sleep disturbance and stress, affecting all residents but particularly families with children, shift workers, and those with mental health conditions (disability).
Proximity and location of Noise Action Important Areas (NIAs) and noise agglomerations	Missing	Missing	• The Plan does not mention Noise Action Plan Important Areas.	✗ Social housing and lower-cost homes are more likely to be located near NIAs, which disproportionately impacts lower-income residents, often intersecting with race and disability.
Proximity of development to major sources of noise	Addressed	Addressed	• Policy SP3's principles on amenity and compatibility with adjoining uses cover this effectively at the site-specific level. • Policy CA3 (RAF Brize Norton) covers one of the main noise hotspots. It requires incorporating appropriate noise attenuation and design measures for development areas affected by aircraft noise. • Area Strategies provide requirements for assessment of noise impacts.	✓ Requiring that development be compatible with adjoining land uses and benefits for those most likely to be affected by noise impacts, including children, older people, and disabled people with sensory sensitivities.
Landscape design of development, tree cover and green infrastructure	Addressed	Addressed	• Policy DM1 (Green Infrastructure) and DM6 (Trees and Hedgerows and Woodland) promote the use of planting and landscape features that can act as effective acoustic buffers.	✓ This benefits all residents by creating quieter, more pleasant environments.

Health and Equality Effects - Noise				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Proximity of residential units to industrial uses or uses generating late night noise can cause nuisance	Addressed	Addressed	Policy SP3 and DM14 (managing town centre uses, including evening economy) provide the necessary controls.	✓ This is important for protecting the sleep and health of all residents, particularly children, older people, and those with existing health conditions (disability).

Summary and recommendations
In contrast to the comprehensive policy on air quality (DM13), there is no equivalent dedicated policy for noise nor are impacts on NIAs mentioned. While amenity is mentioned in Policy SP3, the lack of a specific policy means the impact of significant noise on stress, sleep, and cardiovascular health, and the need to consider designated Noise Action Plan Important Areas, are not fully addressed. There is potential for noise to be included as part of CP7 with regard to Healthy Place Shaping (incorporated into HIA as part of the toolkit). New development is likely to result in construction-related noise and noise assessments are undertaken as part of statutory Environmental Impact Assessments for projects. However, assessment outcomes would need to consider the needs of different groups accordingly through closer alignment with the HIA work. Policy recommendations: • There is potential to introduce a new, dedicated Development Management policy on Noise, similar in structure to DM13 on Air Quality. It should require noise impact assessments and set clear expectations for mitigation through layout, screening, and building design. A new Noise policy should require proposals to identify and assess impacts in relation to any designated NIAs, preventing the siting of sensitive development in these locations without appropriate mitigation. • Due to the nature of their accommodation, gypsy and traveller communities may be more vulnerable to noise associated with new development. Whilst policy DM24 considers noise in relation to the selection of new traveller sites there is also a need to identify how noise from new developments may specifically affect existing authorised pitches and plots. • Developments near to schools or care homes or areas with a high proportion of vulnerable groups may have more adverse noise effects on health. Wherever possible, significant noise should be kept away from residential properties and facilities that are sensitive to noise.
Supporting plans and mitigation
• Health impact assessments (HIAs) are to be required for all major developments – this includes a requirement to assess noise impacts. • Noise assessments are also a statutory requirement of the Environmental Impact Assessment process and include noise mitigation recommendations.

Theme 5: Healthy Food Environment

Baseline
- Overall, West Oxfordshire has lower than national rates of hot food takeaways. However, some areas such as Witney Central, Carterton South and Chipping Norton have a much higher than average number of takeaways per 1000 population than the national rate. - Childhood obesity is a key issue and priority for West Oxfordshire. - Access to supermarkets and fresh food outlets varies across the district, with rural communities experiencing reduced physical access to affordable, healthy food options - Consultation feedback on the Regulation 18 plan showed strong community support for allotments, community growing and local food systems, while developer responses questioned the evidence for the 10-minute walk standard and the enforceability of hot food takeaway restrictions.
Evidence
- A combination of limited physical access and digital exclusion can result in challenges to accessing food in rural areas. - Some groups may have more challenges around affordability of food, including low-income households, disabled people and older people. - Cost-of-living pressures have increased food insecurity, particularly for low-income households, single-parent families, disabled people and older people - Foodbanks exist to support those struggling with food costs in Witney.

Health and Equality Effects – Healthy Food Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Proximity of proposed development to fast food outlets/hot food takeaways	Addressed	Missing	- Although mentioned in a wider context under Policy DM8 (A Healthy Food Environment), there are no specific policy requirements about the proximity of fast food outlets or hot food takeaways within the Plan. CP7 (Healthy Place Shaping) sets out requirements for HIAs for major developments using the Oxfordshire HIA Toolkit. This includes assessing the health food environment.	- x The removal of this restriction leaves a gap in protecting the health of children and young people and in tackling obesogenic environments, which often have a greater impact in more deprived areas. - x This may result in negative health and equality effects unless the restriction is reinstated or addressed through other mechanisms.
Inclusion of fast food outlets/hot food takeaways	Addressed	Missing	Although mentioned in a wider context under Policy DM8 (A Healthy Food Environment), the Regulation 18 draft policy restriction on hot food takeaways	x The removal of this restriction leaves a gap in protecting the health of children and young people and in tackling obesogenic environments, which often have a greater

Health and Equality Effects – Healthy Food Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
within the proposed development and the proximity to local schools			near schools has been removed. There are no specific policy requirements about the proximity of fast food outlets or hot food takeaways within the Plan.	impact in more deprived areas. This may result in negative health and equality effects unless the restriction is reinstated or addressed through other mechanisms.
Opportunities to grow and purchase local healthy food locally	Addressed	Addressed	Policy DM8 requires community gardens or allotments in larger developments and supports the establishment and operation of market gardens and food networks for the benefit of local communities.	✓ This improves health outcomes for all, but particularly benefits low-income households, who are most affected by the cost and accessibility of fresh food. ✓ Allotments also provide social and mental health benefits for older people and those not in work.
Redevelopment or provision of local allotments, community growing projects, communal gardens or agricultural land	Addressed	Addressed	• Policy DM8 explicitly requires provision of allotments or community gardens for developments of 50+ units.	✓ As above, this creates opportunities for physical activity and access to affordable, healthy food, which is particularly beneficial for lower-income households and older people. ✓ Policies to support the growing of food locally can help those households in rural areas and those who have affordability issues. However, this will depend on the availability and cost of food.
Promotion of diversity of shopping facilities	Addressed	Partially Addressed	• The Regulation 18 requirement for larger developments to ensure access to grocery stores and healthy food outlets within a 10-minute walk has been removed from the Regulation 19 Plan. DM14 (Town Centres) and the Area Strategies support diverse town centres.	✓ Prevents the creation of “food deserts”, which disproportionately affect those without cars (older people, disabled people, lower-income households) and can exacerbate diet-related health inequalities that are more prevalent in some ethnic minority communities. However, the removal of the food retail access requirement weakens this safeguard in the Regulation 19 Plan.
Opportunities for “greening” the environment, through green infrastructure that contributes to food provision	Addressed	Addressed	• Policy DM8 directly supports this through requirements for allotments and edible planting in public spaces.	✓ Provides universal benefits for health, wellbeing, biodiversity, and community cohesion.

Health and Equality Effects – Healthy Food Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Online access and local delivery of healthy food	Missing	Missing	Specific reference to home delivery of healthy food is not mentioned in policies.	x Lack of digital infrastructure and home-delivery options, may cause social isolation or increased dependency on driving.

Summary and recommendations
Policy DM8 provides a specific policy on the healthy food environment which addresses the considerations of this theme. This policy can help provide benefits for those groups that experience higher rates of obesity or lack access to affordable healthy food shops, allotments and space to grow healthy food. Local allotments and community gardens can also help improve physical activity and social cohesion within communities. The Regulation 18 policy also aimed to protect the health of children and young people by addressing the proximity of new development to hot food takeaways. This provision has been removed from Policy DM8 in the Regulation 19 Plan and it is recommended that these impacts are considered through wider strategies to tackle obesity and improve health outcomes for children and young people. Policy recommendations: Food shopping delivery services can support those who do not have access to a car or for those who have a protected characteristic which means they are unable to drive (age or disability). This requires understanding barriers to online shopping and deliveries, such as lack of digital skills, inaccessible websites, and limited services in rural areas. Policy DM8 could include specific reference to how developers working with local groups may also encourage local home delivery services of healthy food by rural businesses. This could also align with DM28 (Supporting the Rural Economy) and DM31 (Supporting Digital Infrastructure and Connectivity).
Supporting plans and mitigation
- Oxfordshire Food Strategy (2022)¹⁴ - West Oxfordshire Food Action Plan¹⁵

¹⁴ Good Food Oxfordshire (2022) Oxfordshire Food Strategy <https://res.cloudinary.com/ddcqlg6tr/image/upload/v1673346547/jia8wz0vzuzklnrluglj.pdf>

¹⁵ Good Food Oxfordshire <https://res.cloudinary.com/ddcqlg6tr/image/upload/v1714072814/cnahy6lrebzzroup3v3q.pdf>

Theme 6: Physical Activity

Baseline
- Levels of active adults in West Oxfordshire are comparable to regional averages and 5% higher than national averages. - However, only 48.5% of children and young people are achieving Chief Medical Officers' (CMO) recommended levels of activity, lower than regional and national averages¹⁶. - Consultation respondents asked for recreational and play facilities to be designed for all ages, genders and abilities, and for deficits in provision in densely populated areas to be prioritised.
Evidence
- National and local data show that disabled people, women, older people, certain ethnic minority groups and those in lower-income households are less likely to meet recommended activity levels. - Barriers identified by West Oxfordshire inactive residents to participating in physical activity include cost, accessibility, health conditions, safety fears, convenient facilities, lack of confidence and time due to work. Those who experience the most barriers to participation in physical activity include disabled people, women, certain ethnic minority and religious groups and trans people. - Inactive residents would be more encouraged to partake in physical activity with cleaner, improved and accessible facilities, classes at different times of the day and a better range of facilities, car parking and activities at parks and open spaces. - Active travel can contribute to increased physical activity. However, some groups face barriers to walking and cycling for a range of reasons from lack of infrastructure, training and confidence, costs of bikes and cycle equipment, safety and security.

Health and Equality Effects – Physical Activity				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Opportunities for physical activity	Addressed	Addressed	- Policy DM7 (Sport, Recreation and Play) provides a comprehensive framework for protecting and providing a wide range of formal and informal facilities. - Policy CP7 (Healthy Place Shaping) encourages physical activity through the provision of accessible open spaces, active travel and recreational facilities.	✓ By requiring facilities to be inclusive for all ages and abilities, policies support positive health outcomes across protected characteristic groups, from accessible play areas for disabled children to gentle exercise opportunities for older people.

¹⁶ Sport England Active Lives Children & Young People Survey Academic Year 2018-2019/2021-22

Health and Equality Effects – Physical Activity				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Opportunities for active travel	Addressed	Addressed	Policy CP8 (Sustainable and Integrated Transport) and Policy DM16 (Active and Healthy Travel) are dedicated policies focused on creating and protecting safe and attractive active travel infrastructure and networks.	✓ The emphasis on high-quality, safe, and segregated design may encourage participation among women, children, older people, disabled people and ethnic minority groups.
Facilitated access to open and natural space	Addressed	Addressed	This is addressed through the combined effect of DM1 (Green Infrastructure), DM7 (Sport, Recreation and Play), and DM16, which ensures the provision of spaces and the connections to them.	✓ Access to nature has important mental and physical health benefits. Ensuring access is inclusive for disabled people (e.g. accessible paths) and feels safe for all groups is vital for health equity.
Infrastructure (built and transport) that incentivises and supports physical activity	Addressed	Addressed	This is the core purpose of Policy DM7 and Policy DM16.	✓ This supports physical activity options that can improve health and wellbeing for all and can reduce social isolation for older people and other groups.
Opportunities for leisure activities including informal activities such as gardening or food growing	Addressed	Addressed	Addressed through DM7, DM8 (A Healthy Food Environment), and DM1 (Green Infrastructure).	✓ Gardening is a popular and accessible form of activity for older people and can provide therapeutic benefits for people with mental health conditions (disability).

Summary and recommendations
The policies outlined above aim to enhance active travel and infrastructure for sports and recreation. This could positively impact protected groups that would benefit from increased opportunities to be physically active. These include children and older people, disabled people, women, pregnant women and ethnic minority groups where the prevalence of chronic disease such as diabetes and cardiovascular disease is higher. Requiring an HIA for each development will ensure health determinants are considered and integrated into design and construction. By ensuring that new developments adhere to the agreed Oxfordshire-wide principles of healthy place shaping, there is the potential for positive health impacts through increased physical activity enabled by open space and active travel infrastructure. Policy recommendations: A focus on active travel infrastructure (Policy DM16) may help reduce affordability barriers to partaking in physical activity for low-income households. However, there may be a need to combine infrastructure with other active travel policies to help with financial costs associated with cycling.

- Policy **DM7** should address the specific challenges and needs of those who face barriers to participating in physical activity such as accessible active travel infrastructure, requirements for changing and sanitary facilities. It is recommended that Sport England Accessible and Inclusive Sports Facilities (AISF) is added to the best practice guidance within this policy¹⁷.
- There are currently four Changing Places toilets across the district. There is the potential to include Changing Places toilets as a requirement for certain new leisure and recreational developments in Policy **DM7**.
- There is potential for enhancement of Public Rights of Way including integration of active travel networks to encourage physical activity – especially in rural areas.

Supporting plans and mitigation

- West Oxfordshire Strategic Outcomes Planning Model: Stage 1-3¹⁸
- West Oxfordshire Playing Pitch Strategy & Action Plan Report ¹⁹
- Active Oxfordshire's Strategic Plan 2020-2040

¹⁷ Sport England (2024) sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/accessible-inclusive

¹⁸ West Oxfordshire (2024) Strategic Outcomes Planning Model : Stages 1-3

¹⁹ Knight, Kavannah & Page Ltd (Feb 2022) West Oxfordshire Playing Pitch Strategy & Action Plan Report

Theme 7: Crime and Anti-Social Behaviour

Baseline
- For the year ending September 2024, there was a crime rate of 50.5 per 1,000 population in West Oxfordshire compared to the England and Wales average crime rate of 88 per 1,000 people. - The highest crime rates in the district are for violence and sexual offences and anti-social behaviour.
Evidence
- Some groups are more likely to be victims of crime including women, young people and ethnic minority groups. - Fear and perceptions of crime can be a barrier to using public spaces and facilities. - Groups protected by Hate Crime legislation include religion, race, sexual orientation, disability and transgender identity. These groups may have greater safety and security concerns when travelling or using public spaces or facilities.

Health and Equality Effects – Crime and anti-social behaviour				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Designing out crime, including both the built and landscaped environments	Addressed	Addressed	- Policy SP3 (Key Development Principles) requires safe, suitable and inclusive access for all users. - Natural surveillance and safety-led design requirements are included in policy DM16 (Active and Healthy Travel) and the Strategic Location for Growth development templates. - The former reference in the Regulation 18 policies to Secure by Design principles have been removed.	✓ A safe environment is a fundamental determinant of health. Fear of crime can limit activity and increase stress, with disproportionate impacts on women, older people, and those who may be targets of hate crime (race, religion, sexual orientation, gender reassignment).
Level of security and street surveillance	Addressed	Partially Addressed	- Natural surveillance requirements are now included in Policy DM16 and the Strategic Location for Growth development templates. - The Regulation 18 requirements for the 'safety of children and vulnerable users... through secure	✓ The focus on positive design (safe routes) alongside surveillance, helps to create environments that feel safe. This also helps to alleviate negative perceptions of security and safety which can be a barrier for ✓

Health and Equality Effects – Crime and anti-social behaviour				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			boundaries, surveillance and safe routes' have not been carried forward into Policy SP3.	✓ some groups.
Community engagement	Addressed	Addressed	Engagement is encouraged through DM23 (Community-Led Housing) and required for the loss of community assets under DM15. CESPs under DM29 also require community engagement.	✓ Strong community cohesion is a protective factor for mental health and can reduce crime. This benefits everyone, particularly groups at risk of social isolation, such as older people and single-person households.
Major accidents and disasters	Missing	N/A	The policies deal with site-specific amenity and design issues and do not address resilience to major non-climate related incidents. This is a strategic-level issue not delegated to the Local Plan.	n/a
Safety after dark	Addressed	Addressed	- Policy DM12 (Light Pollution and Dark Skies) requires lighting to be designed for safety while minimising environmental harm. - Policy DM14 (Town Centres) and the town centre policies within the Area Strategies support a safe evening economy.	✓ Creating places that are and <i>feel</i> safe after dark is important for the planning of inclusive environments. This is especially the case for women, young people, disabled people, certain ethnic minority and religious groups and those from the LGBTQ+ community.
Creation of safe and inclusive environments, spaces and places	Addressed	Addressed	This is a thread running through many policies, including SP3, DM7 (Sport, Recreation and Play), DM14, DM16, DM19 (Creating Mixed and Balanced Communities).	✓ An inclusive environment is one where all people, regardless of protected characteristic, feel they belong and can participate fully.

Summary and recommendations
The policies make minimal reference to crime and anti-social behaviour, although safety and security are mentioned across many objectives and policies. Whilst crime rates are relatively low in the district, some groups may have barriers to using public spaces and facilities due to actual experiences and perception of crime and anti-social behaviour. Lack of specific measures to improve perception of public and open spaces may result in the underuse of facilities by groups which in turn can lead to health and equality issues through social exclusion and exacerbated safety concerns

Policy recommendations:

- Inclusive Design Principles/standards should be set for new developments. This could include tools to help design out crime, for example engagement with vulnerable groups, women's safety audits/assessments, and the requirement for night and day design drawings. This should apply to both construction and operational phases of new developments.

Supporting plans and mitigation

- Health impact assessments (HIAs) are to be required for all major developments – this includes a requirement to assess crime and anti-social behaviour impacts.

Theme 8: Education and Skills

Baseline
• Within the district there are 53 primary schools, 2 infant schools, 1 nursery, 1 special school and 7 secondary schools in the district • Educational achievement is relatively high in West Oxfordshire. West Oxfordshire is in the 80th percentile of local authorities for average qualification rank. • Abingdon and Witney College provides sixth form and college courses and adult education courses to local residents. Adult learning centres are situated in Carterton and Chipping Norton with provision in Burford, Charlbury, Eynsham and Witney. • Consultation respondents supported apprenticeships, volunteering and lifelong learning, and called for skills development for low-carbon construction and retrofit; developers considered the Community Employment Plan requirement onerous for smaller sites.
Evidence
• There is a shortage of nursery places and school places in parts of West Oxfordshire and new housing developments may apply additional pressure to schools and students. • SEND provision is limited to one special school, with some children travelling outside the district for specialist support. • The IDP identifies a deficit of Adult Learning services in Witney and it is a high priority to have an Adult Learning Centre in the town.

Health and Equality Effects – Education and Skills				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Access to schools/higher education	Addressed	Addressed	• Policy DM15 (Community Facilities and Services protects existing educational facilities from loss. • Policy CP4 (Delivering Infrastructure In-step with new development) and DM29 (Learning, Skills and Training Opportunities) support the creation of new facilities and require contributions from developers to ensure provision keeps pace with growth.	✓ Good access to local schools is vital for children and their families. It reduces travel stress for parents (often women), and supports educational attainment, a key determinant of long-term health.
Local school capacity	Addressed	Addressed	• Policy DM29 states that major developments will be expected to make provision for education infrastructure on-site or through financial contributions.	✓ Ensuring sufficient capacity prevents overcrowding and the need for long journeys to school, benefiting children's wellbeing and educational outcomes.

Health and Equality Effects – Education and Skills				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			Policy CP4 and Area Strategies require the delivery of education infrastructure to align with development proposals and population growth.	
Opportunities for people to learn in an alternative educational setting	Addressed	Addressed	- Policy DM29 refers broadly to learning, skills and training opportunities and does not specify that these are within an educational setting. - Policy DM8 (A Healthy Food Environment) sets out requirements for developers to show how community involvement in community gardening programmes and food workshops. - Policy DM31 (Supporting Digital Infrastructure and Connectivity) sets out requirements for new developments to incorporate high standards of digital infrastructure and connectivity supporting opportunities to learn from home.	✓ This is important for promoting health equity. It supports older workers needing to reskill, women returning to the workforce, and disabled people who may require more flexible or vocational training environments.
School performance	Partially addressed	Partially Addressed	Planning policy cannot directly influence school performance, which falls under the remit of education authorities. However, Policy DM29 supports learning and skills development opportunities accessible to schools.	✓ School performance may be enhanced through the provision of additional learning, skills and training resources.
Skills and training for green economy	Partially addressed	Partially Addressed	- Policy DM29 requires developers to produce CESP. However, this does not specify a requirement for supporting development and training in green construction skills. - The introduction to Policy DM11 (Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience) recognises that retrofitting presents opportunities for green skills development. However, it does not specifically make any requirements within the policy itself. - There are no policies to support centres for green skills development.	✓ This is important for preparing the workforce for an increase in 'green' employment opportunities. It also supports older workers needing to reskill, women returning to the workforce, and disabled people who may require more flexible or vocational training environments.

Health and Equality Effects – Education and Skills				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Provision of adult education facilities	Partially addressed	Partially Addressed	Policy DM26 (Conversion, Extension and Alteration of Traditional Buildings) could support adult learning provision through enabling the reuse of traditional buildings for training centres. However, the policies do not specifically mention adult education provision.	✓ Adult learning centres are important to upskill local people while limiting time, affordability and mobility constraints associated with travelling to educational centres further afield.

Summary and recommendations
Policy DM15 protects existing education facilities, while Policy CP4 and Policy DM29 support the creation of new facilities and require developer contributions to ensure skills and training keep pace with growth. These policies help to provide opportunities for local children and young people. They also support those who are not in education, employment and training and those who may be returning to work after a career break, such as women or older people. However, the plan makes no specific mention of adult education facilities, even though the West Oxfordshire Infrastructure Delivery Plan identifies a deficit of adult learning centres in Witney. Adult learning centres are important for upskilling local people and can support the Local Plan's overall ambition and objectives through education and training in skills such as healthy food preparation, green construction skills, cycle training, and gardening. They can also benefit those with time, cost, and mobility barriers to accessing education. Policies need to consider new skills needed to address and tackle climate change and reduce carbon emissions. Recommendations: • Policies supporting education and skills (including the CESP requirement in Policy DM29) should consider just transition principles in the move to a net zero society. Reference could be made to training and re-skilling for jobs in the green economy, including the potential to work with existing local delivery partners such as agri-tech at the Livestock Technology Centre, and the Advanced Skills and Green Construction Centre in Abingdon. • Policy DM29 could prioritise schools in deprived areas or those that are underperforming to help support improved learning outcomes for children and young people in the areas of most need. • Policies DM26, DM15 and WIT1 could contain a specific mention on the protection and creation of adult education centres (including in alternative settings).
Supporting plans and mitigation
• Oxfordshire Local Areas SEND Strategy²⁰ • West Oxfordshire Infrastructure Delivery Plan • Pupil Place Plan.

²⁰ Oxfordshire County Council (May 2022) Oxfordshire Local Area Special Educational Needs and Disability (SEND) Strategy 2022-2027 <https://www.oxfordshire.gov.uk/children-and-families/oxfordshire-send-local-offer/send-strategy/local-area-send-strategy>

Theme 9: Natural Environment

Baseline
34% of the district is located within the Cotswolds National Landscape. - Sites identified for their biodiversity or geological importance, including 29 Sites of Special Scientific Interest, a Special Area of Conservation at Cassington Meadows, two National Nature Reserves (NNRs): Wychwood NNR and Chimney Meadows NNR. There is also 6,584 hectares of woodland, accounting for 9.22% of its total land area, including the Wychwood Forest, the least developed area in Oxfordshire - The district contains Blenheim Palace World Heritage site, 16 parks and gardens of special historic interest and 146 scheduled ancient monuments. - Consultation responses strongly supported nature recovery and improved access to green space, while questioning the Council's ecological capacity to enforce biodiversity net gain.
Evidence
- The West Oxfordshire Open Space Study 2013-2029 which evaluated the quantity, quality and accessibility of open space and recreational provision in West Oxfordshire identified that the majority of wards had poor accessibility to greenspace. - Public rights of way in the district do not always meet modern accessibility and recreational expectations due to terrain and the paths needing to allow for land use constraints.

Health and Equality Effects – Natural Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Natural, ecologically functioning spaces, including water, grassland, woodland/trees	Addressed	Addressed	This is comprehensively covered by Policy CP10 as well as Policies DM1 (Green Infrastructure), DM2 (Ecological Protection, Biodiversity Net Gain and Nature Recovery), DM3 (Landscape Character), and DM6 (Trees and Hedgerows and Woodland).	✓ Enhancing biodiversity and improving access to high-quality natural environments has universal health benefits, improving both physical and mental wellbeing for people of all ages and backgrounds.
Accessibility to natural green and blue spaces and places	Addressed	Addressed	Policies DM1 and DM7 (Sport, Recreation and Play) require the provision of accessible green space and recreational facilities. Policy DM16 (Active and Healthy Travel) requires active travel links.	✓ Policies to promote access to natural space can support positive health and wellbeing outcomes for all users. The design of these spaces must be inclusive for disabled people, older people and those with pushchairs and young children (e.g., accessible paths, toilets, seating).

Health and Equality Effects – Natural Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Consideration of community barriers to access	Partially Addressed	Partially Addressed	The Plan requires provision and connections, but does not explicitly require an assessment of, or measures to overcome, potential non-physical barriers (e.g. cost, safety, amenities, cultural inclusivity).	✗ Barriers can prevent certain groups from benefiting from green space. Disabled people and older people may face physical barriers. Women and people from LGBTQ+ communities may have safety concerns. People from some ethnic minority backgrounds may feel spaces are not culturally inclusive.
Use/greening of existing built infrastructure	Addressed	Addressed	Policy DM11 (Retrofitting) encourages sustainable upgrades, which can include green roofs/walls. Policy DM1 applies to all development.	✓ Greening urban areas benefits all, particularly those living in denser housing with no private garden space, who often include people on lower incomes, young people and certain ethnic minority groups.
Design of existing environments including footpaths and cycle ways to maintained green spaces and places	Addressed	Addressed	Policy DM16 requires new active travel routes to connect with existing networks and key destinations, including green spaces.	✓ Safe and direct routes are essential for enabling children, older people, and disabled people to access green space independently. These must be accessible for benefits to be realised.
Support maintenance of open spaces, play spaces and sports facilities	Addressed	Addressed	Policy DM1 and DM7 both require long-term management and maintenance plans to be secured.	✓ Well-maintained spaces can feel safer and encourage use by those who have safety and security barriers to participating in outdoor activity.
Temporary or permanent diversion and/or closure of walking, cycling or horse riding routes	Addressed	Addressed	Policy DM16 explicitly protects existing active travel routes from harm or severance.	✓ Protection of these routes is important for maintaining existing activity levels and social connections for all groups. Enhancement may be needed in some areas to improve accessibility.
Agricultural development and associated localised environmental impacts (e.g. pollution/run off)	Partially Addressed	Partially Addressed	The DM policies focus on non-agricultural development, although DM13 (Air Quality) and SP3 (Key Development Principles) could apply.	✗ Rural residents, who may include a higher proportion of older people, can be disproportionately affected by adverse agricultural impacts.
Flood management	Addressed	Addressed	Policy CP1 (Climate Change) now requires development to be supported by a Sustainability Statement (replacing the previous Climate Impact Assessment requirement). Policy CP5 (Water	✓ The policies aim to reduce the risk of flooding and promote the management of flooding in the district. The impacts of flooding may have a disproportionate impact on those from low-income households due to insurance

Health and Equality Effects – Natural Environment				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			Environment) requires new developments to consider flood risk. • Area Strategies address flood risk at the local level, avoiding new developments in areas of high risk and incorporating SUDs mitigation.	and recovery costs. Older people, disabled people and families with children could be more negatively impacted by temporary relocation due to flooding.
Inclusive heritage /historic environment	Partially addressed	Partially Addressed	• Policy CP9 (Historic Environment) and Policy DM26 (Conversion, Extension and Alteration of Traditional Buildings) cover protection and alteration of traditional buildings and heritage sites. CP9 requires justifying harm to the historic environment weighed against public benefits.	x Some historic statues monuments may symbolise injustice based on associations with historical ethnic or religious discrimination.

Summary and recommendations
Policy CP10 and supporting development policies offer strong protections for the natural environment. Together, they promote biodiversity and support access to green and blue spaces benefiting mental and physical wellbeing for people of all ages. These policies encourage recreation, sport, play, and sustainable transport links to nature. However, health benefits will only be realised if green spaces are located within reach of diverse communities, designed inclusively and adapted for safe and confident use by disabled people, older adults, and families with young children. Policy recommendations: • Policies could include further detail on how the public may access and benefit from new natural environment whilst also protecting and safeguarding new habitat creation. For example, through community involvement in habitat creation and management. • Consideration should be given to how planning policies can support inclusive heritage by increasing representation, connection, and participation at historic sites for diverse groups. This may include specific exemptions or adaptations to Policy CP9 where existing heritage assets or associated narratives may cause harm or offence to individuals based on a shared protected characteristic.
Supporting plans and mitigation
• Oxfordshire Local Nature Recovery Strategy (LNRS)

Theme 10: Housing

Baseline
- West Oxfordshire had a housing affordability ratio of 11.4 in 2023, with an average house price of 11.4 times the average annual earnings in the area. The average house price in West Oxfordshire (£411,000), is much higher than the UK average of £290,564 (provisional Jan 2025). - For first time buyers in West Oxfordshire, the average house price as of December 2024 was £333,000²¹. - There are approximately 3,000 households currently on the Council's affordable housing waiting list. - Consultation feedback supported the 40% affordable housing benchmark subject to viability, linked affordability to local incomes, and highlighted the loss of homes to short-term holiday lets.
Evidence
- Evidence shows that poor housing conditions (including damp, cold, mould, noise) are strongly associated with poor health, both physical and mental. Specific physical effects include respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality. - An ageing population in West Oxfordshire will require specialist accommodation for older people so that they can live independently. - High house prices and rents can be a barrier to accessing housing, especially for young people and those on low incomes. - West Oxfordshire has twice the national rate of Gypsy and Traveller communities and there is a need for further accommodation as set out in the West Oxfordshire Gypsy and Traveller Needs Assessment.

Health and Equality Effects - Housing				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Delivery of affordable housing	Addressed	Addressed	Policy DM20 (Affordable Housing) is a comprehensive policy setting out requirements. The Regulation 19 policy adds a requirement for a minimum of 65% of affordable housing to be provided as social rent. It is well-supported by DM23 (Community-Led Housing) and DM22 (Custom and Self-Build), which include affordable plots.	✓ Secure, affordable housing is a primary determinant of health. This policy could have a significant positive impact on health, particularly for younger people, families on lower incomes, and can prevent homelessness. Tenure mix requirements in DM19 also promote inclusive communities.

²¹ ONS (Feb 2025) <https://www.ons.gov.uk/visualisations/housingpriceslocal/E07000181>

Health and Equality Effects - Housing				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Provision of accessible and adaptable dwellings	Addressed	Addressed	Policy DM19 (Creating Mixed and Balanced Communities) requires all new homes to meet M4(2) standards and a minimum of 5% of homes on major sites to meet M4(3) for wheelchair users. DM21 (Specialist Housing) reinforces this for older people's housing.	✓ Policies promote the independence and wellbeing of disabled people and an ageing population. This is a cornerstone of inclusive housing and directly promotes health equity.
Housing density	Addressed	Addressed	Policy DM5 (Efficient Use of Land) directly addresses this, encouraging higher densities in appropriate, sustainable locations.	✓ Higher density living can support walkable neighbourhoods, benefiting all.
Energy efficiency	Addressed	Addressed	Policy DM9 (Net Zero Carbon Development) and DM11 (Retrofitting for Energy Efficiency) are ambitious and comprehensive policies that set high standards for buildings.	✓ Highly energy-efficient homes can help to reduce fuel poverty, which has a disproportionately positive impact on the health of lower-income households, older people, and disabled people, who spend more time at home and are more vulnerable to cold weather conditions.
Social rented housing	Addressed	Addressed	- Policy DM20 (Affordable Housing) specifies a minimum 65% social rent requirement. - Policy DM23 (Community-Led Housing) encourages Town and Parish Councils to identify potential sites to deliver new affordable homes, in particular social rented accommodation.	✓ Prioritising social rented housing (including within Neighbourhood Plans) is likely to have positive health and equality impacts for low-income households.
Gypsy Traveller community provision	Addressed	Addressed	Policy DM24 provides for the accommodation needs of Gypsies, Travellers, and Travelling Showpeople in West Oxfordshire, in accordance with the most recent accommodation assessment of need and protects against loss of existing sites. The policy includes a requirement for 36 new pitches (28 for Gypsies and Travellers; 8 for Travelling Showpeople).	✓ Integrating suitable provisions for travelling communities into the planning process helps to foster social inclusion and community cohesion. ✓ The development supports new sites and the expansion of existing ones in locations that are accessible to essential services and facilities.

Summary and recommendations

The Local Plan sets out a housing target that exceeds the district's assessed need. Policies **DM20** and **DM23** prioritise social housing, directly benefiting low-income households. In addition, policies **DM19** and **DM21** require homes to be accessible and adaptable, helping older and disabled residents live independently and safely.

These policies are likely to have positive impacts on health by increasing opportunities for secure rent and home ownership.

Major housing developments can pose risks for some protected groups. These include:

- Health impacts from construction (dust, noise, air quality),
- Access barriers caused by changes to footpaths and traffic routes,
- Pressure on local services such as GP surgeries and schools, especially if new infrastructure isn't provided upfront.

This may be more pronounced for existing communities experiencing cumulative impacts of new developments.

Policy recommendations:

- Policies DM20 and DM23 could include specific measures to support first-time buyers, particularly in sought-after areas where local people may be priced out of the market. For example, "local connection" or "principal residence" tests as part of the policy for development where there is a specific local need.
- It is recommended that an accredited Access Consultant²² forms part of the design review process (Policy **CP6**) to provide advice on access and inclusion for new developments.
- Policies could support hybrid and home-working by supporting new developments aimed at young people with shared workspace areas and communal facilities.
- Ensure that required housing development-level HIAs (and other impact assessments) take into account cumulative impacts of development on local services.

Supporting plans and mitigation

- Oxfordshire Specialist and Supported Housing Needs Assessment 2024
- West Oxfordshire District Council Gypsy and Traveller, Travelling Showperson and Boat Dweller Accommodation Assessment 2024

²² National Register of Access Consultants <https://www.nrac.org.uk/>

Theme 11: Access to Services

Baseline
- There are 13 GP surgeries within the district and two community hospitals providing rehabilitation and palliative care (Witney Community Hospital) and outpatient and maternity services (Chipping Norton War Memorial Community Hospital). - Primary Care services across West Oxfordshire score highly for GP and Pharmacy services - Infrastructure lagging behind development, particularly healthcare, schools, water and sewage, was the most prominent concern raised in consultation, with calls for infrastructure to be delivered first and for Grampian-style conditions, especially in Tier 3 settlements.
Evidence
- The rural facilities and services in West Oxfordshire 2023 report by the Plunkett Foundation used the Co-op's wellbeing index to form community profiles for West Oxfordshire postcodes. This indicated consistently low scores related to "Equality" and "Health" across all service areas, with recommendations that action taken by the Council to protect and enhance rural facilities and services provision in West Oxfordshire should use these data areas as priorities for any businesses or groups supported. - Some groups have higher demand for health services, for example, older people, disabled people and women than and this includes those without access to a car.

Health and Equality Effects – Access to services				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Provision of accessible healthcare services	Addressed	Addressed	- Policy CP4 (Delivering Infrastructure In-Step with New Development) addresses the need for adequate healthcare infrastructure in place prior to development. - Policy DM15 (Community Facilities and Services) protects existing healthcare facilities from loss and supports new ones.	✓ Access to healthcare facilities is important for all groups, but particularly for older people, disabled people and pregnant women. Good access to primary care is a cornerstone of a healthy population and can reduce health inequalities.
Access to existing local facilities and services (e.g. GP surgeries, pharmacists, shops, recreation etc.)	Addressed	Addressed	Policy DM15 provides strong protection against the loss of valued community facilities, including shops, pubs and post offices.	✓ This policy supports community health, particularly in rural areas. It benefits residents with mobility restrictions, including older people, disabled people, and those on lower incomes, supporting independent living.

Health and Equality Effects – Access to services				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
Health and social care needs and demand for services	Addressed	Addressed	• Policies CP4 and DM15 require new developments to be supported by new or enhanced infrastructure, including health and social care. • Policy DM21 (Specialist Housing) directly addresses a key social care need.	✓ These policies support the needs of an ageing population and the increasing prevalence of long-term health conditions and disability.
Capacity of existing local services and facilities	Addressed	Addressed	• Policy DM15 protects existing facilities from loss unless they are proven to be no longer viable or necessary. • Policy DM29 ensures new development contributes to new capacity.	✓ This prevents the loss or reduction in services for existing communities as new residents move in. It supports health and wellbeing for all and prevents resentment between new and existing communities.
Access and use of buildings by disabled people, older people and those suffering from dementia.	Partially Addressed	Partially Addressed	• Policy SP3 (Key Development Principles) states that Development must ensure safe, suitable, and inclusive access for all users. • Requirements in Policy DM19 (Creating Mixed and Balanced Communities and Policy DM21 focus on accessible homes. • Policy DM16 (Active and healthy travel) includes requirements for segregated paths to support older people and disabled people. • No explicit mention of dementia.	✓ Policies demonstrate a commitment to creating an inclusive built environment for people with protected characteristics relating to age and disability. ✗ Policies do not consider dementia-friendly planning or the needs of neurodiverse people. Without explicit requirements, new developments may unintentionally create barriers for older residents and those with cognitive or sensory impairments, especially given the district's ageing population and rising prevalence of dementia.
Access to services and facilities to improve health and wellbeing	Partially addressed	Addressed	• Policy CP4 addresses the need for adequate infrastructure for transport, education, healthcare, open spaces and community facilities in place prior to development. • Policy DM7 (Sport, Recreation and Play) provides a framework for protecting and providing a wide range of formal and informal facilities. • Policy DM15 protects existing community facilities including public houses, schools, healthcare facilities, village halls, libraries, post offices, places of worship, recreational spaces, and local shops. It	✓ Policies protect existing community facilities as well as provide a framework for providing new facilities to improve health and wellbeing. This benefit can be shared by all groups and can help foster good relations between different groups.

Health and Equality Effects – Access to services				
Considerations	Status in Regulation 18 Draft Plan	Status in Reg 19 Draft Plan	Relevant Policies	Potential health and equality effects
			also supports new facilities that contribute to vibrant, healthy, and resilient communities, promoting opportunities for social interaction and wellbeing.	
The cumulative impact of new developments on services	Addressed	Addressed	- Policy CP4 addresses the need for adequate infrastructure in place prior to development. Policy DM15 protects existing facilities from loss unless they are proven to be no longer viable or necessary. - Policy DM29 requires new development contribution to new education infrastructure.	✓ New development may add additional pressure to water and sewage systems within the district, which may result in health problems for local communities if not addressed. Securing infrastructure delivery before development will help minimise this risk.

Summary and recommendations
New housing developments may apply additional pressure on local facilities and services if additional services are not adequately provided. This may be more pronounced for existing communities experiencing the cumulative impact of new developments. Policy CP4 addresses how new infrastructure and services will be delivered to support new development, whilst Policy DM15 protects existing facilities. Protecting existing services is important for local residents' health and wellbeing, enabling them to continue accessing healthcare, education, employment, and recreation. Some protected characteristic groups may rely more heavily on these services, for example children, older people, women and disabled people. While access to services cuts across a number of policies, infrastructure to support home-based delivery of goods or services is limited. This will have further implications for development planning, for example, parking requirements for service providers and deliveries, as well as the digital infrastructure needed to access online services. Policy recommendations: • Ensure that required housing development-level HIAs (and other impact assessments) take into account the cumulative impact of new developments. • Policies could include dementia-friendly design principles to support safe, confident access to services for older people and those with cognitive impairments. • Policies should consider how new developments can support access to goods and services from home, especially in rural areas. For example, short-stay parking, parcel lockers, doorstep access and other measures.
Supporting plans and mitigation
• Oxfordshire Local Transport and Connectivity Plan

Conclusions and recommendations

Overall, the West Oxfordshire Local Plan 2043 demonstrates a strong commitment to health, equality and sustainability. Core policies on Healthy Place Shaping, affordable and accessible housing, active travel, green infrastructure, biodiversity, climate resilience and skills development provide a solid foundation for reducing health inequalities and supporting inclusive growth. The Area Strategies reinforce this by linking development to transport, air quality, green space, community identity and access to essential services.

Across the Plan, there are benefits for groups who typically experience poorer health outcomes, including children, older people, disabled people, women and low-income households. Requirements for social rent, accessible homes, active travel networks, green space, specialist housing and community facilities can all contribute positively to health equity.

The Regulation 19 Plan responds positively to several issues raised in the Regulation 18 HEQIA and consultation:

- Health Impact Assessments are now mandatory for major development (CP7);
- Accessible housing standards are retained with a quantified minimum of 5% wheelchair-user homes on major sites (DM19); a minimum of 65% of affordable housing must be provided as social rent (DM20);
- Provision for 36 Gypsy, Traveller and Travelling Showpeople pitches is quantified (DM24); places of worship are explicitly protected as community facilities (DM15);
- Traffic calming and natural surveillance requirements are embedded in active travel policy (DM16) and 'wheeling' is recognised in the Area Strategies.

However, some policies supporting healthy outcomes have been weakened or removed since Regulation 18. Most notably, the restriction on hot food takeaways near schools and the requirement for access to healthy food within a 10-minute walk (former Policy DM4), the local 20% biodiversity net gain target, and explicit 'secure by design' wording.

The assessment identifies several cross-cutting gaps where policies could be strengthened to maximise health and equality outcomes:

- **Inclusive design:** The Plan would benefit from explicit inclusive design principles, including dementia-friendly and neurodiversity-inclusive planning, secure-by-design approaches, and safety audits. Core policies should also consider providing single-sex toilets and changing facilities, alongside gender-neutral and self-contained alternatives, in line with the Equality Act 2010, the 2025 Supreme Court ruling and the updated 2026 EHRC Code of Practice. This is important for privacy, dignity and safety for women, girls, and trans people.
- **Noise:** There is no dedicated noise policy, despite clear evidence of health impacts and the presence of Noise Action Plan Important Areas.
- **Childcare:** Policies do not require new development to assess or meet childcare needs, which disproportionately affects women and low-income families.

- **Speed reduction:** Transport policies lack explicit measures to reduce vehicle speeds, which is essential for safety, active travel and independent mobility.
- **Digital access and home-based services:** Policies do not fully consider how digital exclusion affects access to services, nor how new development can support home-delivery of goods and services.
- **Adult learning and green skills:** There is no specific policy support for adult education centres or green skills training, despite identified need and support from consultation respondents.
- **Rural access to services:** Rural communities face persistent barriers to accessing healthcare, childcare, healthy food and community facilities.

Addressing these gaps would significantly strengthen the Plan's ability to reduce health inequalities, support vulnerable groups, and deliver inclusive, resilient communities.

Recommendations

It is recommended that a Council officer is nominated to undertake reviews of major development HIAs using the Oxfordshire HIA Toolkit Rapid Review Checklist. The Council should consider requiring an Equality Impact Assessment for major developments to support positive outcomes for groups with protected characteristics. This could be incorporated into the HIA process. Other recommendations include:

- Introduce inclusive design principles across the Plan, including dementia-friendly and neurodiversity-inclusive design, secure-by-design, safety audits, and accessibility consultant review.
- Create a dedicated Noise policy mirroring DM13 (Air Quality) which requires noise assessments and mitigation, and references relevant NIAs.
- Require assessments to identify the need for childcare facilities for major employment and residential developments.
- Add further speed reduction measures (e.g. 20mph zones) to DM16.
- Increase support for rural communities including specific needs for healthcare and childcare provision, healthy food access, home-delivery and flexible transport infrastructure.
- Support adult learning and green skills, including new centres and training linked to Policies DM29 and DM11.
- Ensure provision of single-sex toilets and changing facilities in new public buildings, community facilities, transport hubs and leisure spaces, alongside gender-neutral and accessible alternatives.
- Plan for home-based access to services including parcel lockers, short-stay parking and digital infrastructure.

- Require digital inclusion measures for technology-based policies.
- Support faith and cultural spaces, including adaptations to CP9 where heritage assets cause harm.
- Embed a principle of Sustainable Community Stewardship to balance conservation with meeting local needs.
- Clarify how the Regulation 18 healthy food environment provisions (including takeaway restrictions near schools) will be addressed through wider strategy, given their removal from Policy DM8.
- Retain the mandatory Health Impact Assessment requirement for major developments (Policy CP7) through examination, resisting representations to restrict HIAs to strategic sites only, and incorporate equality considerations within the HIA process.
- Deliver an inclusive Regulation 19 consultation, with an accessible summary and plain-language materials, published equalities monitoring of respondents, and targeted engagement with under-represented groups (including young people, disabled people, faith communities and Travelling communities), so that due regard to the PSED is clearly documented.

Impacts on protected characteristic groups

The HEQIA has demonstrated that the Council has largely paid due regard to the Equality Act 2010 and the aims of the PSED in the development of the Plan. The policies can help advance equality of opportunity and foster good relations between groups by supporting access to affordable and accessible housing, promoting diverse employment and learning opportunities, and providing access to affordable transport options. In finalising the Plan, the Council should also record how the equality impacts of provisions removed or amended since Regulation 18 (notably the healthy food environment provisions) have been considered, in order to further demonstrate due regard to the PSED.

The following table summarises the potential impacts on protected characteristic groups along with recommendations to minimise negative impacts and enhance positive outcomes.

Table 1: Summary of Local Plan impacts on protected characteristic groups

Protected group	Positive	Negative	Recommendations
Children (age)	✓ Supports cleaner air through reduction in emissions. ✓ Encourages healthy behaviours through policies for active travel sports, play and recreation and healthy food environments. ✓ Supports developer-based learning, education and skills opportunities. ✓ Protect existing services and community facilities and requires additional infrastructure in-step with new development.	✗ No specific childcare provision for new developments ✗ Lack of specific noise policies or detailed noise mitigation. ✗ No mention of specific speed reduction measures to support sustainable transport policies ✗ The Regulation 18 restriction on hot food takeaways near schools has been removed from the Regulation 19 Plan.	• Include requirements for childcare provision within relevant policies • Add speed reduction measure for new developments to DM16 • Prioritise underperforming schools or areas of higher deprivation /lower educational achievement in Policy DM29 • A new DM policy on Noise should be created. • Clarify how the Regulation 18 healthy food environment provisions (including takeaway restrictions near schools) will be addressed through wider strategy, given their removal from Policy DM8.
Young People (age)	✓ Supports an increase and diversification of employment, learning, skills and training opportunities. ✓ Delivers affordable homes and prioritises homes for social rent. ✓ Promotes active and sustainable travel. ✓ Protect existing services and community facilities and requires additional infrastructure in-step with new development.	✗ Policies to tackle climate change may result in loss of employment for those employed in more traditional/ carbon-reliant industries.	• Expand on requirements in DM29 for provision of green skills and training. • Expand housing policies to include co-working areas within residential developments etc
Older People (age)	✓ Supports cleaner air through reduction in emissions ✓ Supports the provision of specialist housing for older people ✓ Protection and provides new services such as health care, recreation and transport. ✓ Promotes accessible high streets and town centres.	✗ No mention of infrastructure, storage, parking for mobility aids, wheelchairs, mobility scooters. ✗ Lack of specific security or inclusive design principles. No mention of dementia friendly planning.	• Inclusive design principles to remove barriers to participation in active and sustainable travel and developments for people with a wide range of impairments. • Add speed reduction measures for new developments to DM16 • Policy development for home delivery of goods and services

Protected group	Positive	Negative	Recommendations
	✓ Encourages healthy behaviours through policies to improve access to open space and healthy food environment. ✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ No mention of specific speed reduction measures to support sustainable transport policies. ✗ Limited policy development on delivery of goods and services at home. ✗ Older people may have specific needs with regard to digital access and information. ✗ Lack of specific noise policies or detailed noise mitigation.	• Ensure policies consider inclusive technology • Community involvement in nature-based solutions and healthy food policies to encourage social interaction • A new DM policy on Noise should be created
Disability	✓ Supports cleaner air through reduction in emissions ✓ Supports the provision of accessible and adaptable homes ✓ Encourages healthy behaviours through policies for active travel, sports, play and recreation and healthy food environments ✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ No mention of infrastructure, storage, parking for mobility aids, wheelchairs, mobility scooters. ✗ Limited policy development on delivery of goods and services at home ✗ No mention of dementia friendly planning or consideration for the requirements of neurodiverse population ✗ Lack of specific noise policies or detailed noise mitigation.	• Inclusive design principles to remove barriers to participation in active and sustainable travel and developments for people with a wide range of physical, sensory and mental impairments. • Policy development for home delivery of goods and services.
Gender Reassignment	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ Lack of specific security or inclusive design principles. ✗ Lack of clear provision for gender-neutral or self-contained facilities may negatively affect privacy, dignity and safety for trans people.	• Inclusive design principles to remove barriers to participation in physical activity and use of public areas (including accessibility, security and privacy concerns).
Race	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development. ✓ Quantified provision of 36 new pitches for Gypsy, Traveller and Travelling Showpeople communities (Policy DM24).	✗ Policies to tackle climate change may result in loss of employment for those employed in more traditional/ carbon-reliant industries. ✗ Policies do not explicitly address racial or cultural discrimination in heritage policies. ✗ Lack of protection for Gypsy Traveller and Showpeople sites against noise impacts of new developments.	• Inclusive design principles to remove barriers to participation in physical activity and use of public areas (including accessibility, security and privacy concerns).

Protected group	Positive	Negative	Recommendations
Religion/belief	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development. ✓ Places of worship are now explicitly listed as protected community facilities (Policy DM15).	✗ Lack of policies for new places of worship. ✗ Lack of specific security or inclusive design principles.	• Inclusive design principles to remove barriers to participation in physical activity and use of public areas (including accessibility, security and privacy concerns).
Women (Sex)	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ The absence of planning for childcare facilities may disproportionately impact women and families on lower incomes. ✗ Lack of specific security or inclusive design principles.	• Inclusive design principles to remove barriers to participation in physical activity and use of public areas (including accessibility, security and privacy concerns). • Policy development for home delivery of goods and services
Men (Sex)	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ Policies to tackle climate change may result in loss of employment for those employed in more traditional industries.	• Expand on requirements in DM29 for provision of green skills and training.
Sexual Orientation	✓ Protects existing services and community facilities and requires additional infrastructure in-step with new development.	✗ Lack of specific security or inclusive design principles. ✗	• Inclusive design principles to remove barriers to participation in physical activity and use of public areas (including accessibility, security and privacy concerns).
Pregnancy and Maternity	✓ Supports cleaner air, active travel and access to green space, benefiting pregnant women who are more vulnerable to air pollution. ✓ Requires healthcare and community infrastructure to be delivered in step with new development, supporting access to maternity and health services.	✗ No specific consideration of pregnancy and maternity in design, transport or facilities policies (e.g. rest areas, baby changing and feeding spaces, priority parking).	• Include pregnancy and maternity considerations within inclusive design principles (e.g. seating, baby changing and feeding facilities, step-free routes suitable for pushchairs and priority parking).

Protected group	Positive	Negative	Recommendations
Marriage and Civil Partnership	No differential impacts identified.	No differential impacts identified.	None identified.



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