West Oxfordshire District Council

Local Plan (Regulation 18)
HRA Screening Report

Final report
Prepared by LUC
June 2025

West Oxfordshire District Council

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HRA Screening Report

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Chapter 1
Introduction

1.1 LUC has been commissioned by West Oxfordshire District Council to carry out a Habitats Regulations Assessment (HRA) of its emerging draft Local Plan 2041.

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

Background to the Local Plan 2041

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

1.4 As the Local Plan is now more than five years old, a review is being undertaken and a new Local Plan will be prepared covering the period up to 2041. This provides the opportunity to prepare new and updated policies to reflect more recent evidence and key priorities including the District Council's declaration of a climate emergency in 2019.

The requirement to undertake Habitats Regulations Assessment of Development Plans

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

1.6 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were

classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017[1] (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

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

1.7 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites[2] and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper on changes to the Habitats Regulations 2017 post-Brexit states that:

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

1.8 Although Ramsar sites do not form part of the new national site network, Government guidance[3] states that:

> "Any proposals affecting the following sites would also require an HRA because these are protected by government policy:
>
> - proposed SACs
> - potential SPAs
> - Ramsar sites – wetlands of international importance (both listed and proposed)
> - areas secured as sites compensating for damage to a European site."

1.9 Furthermore, the National Planning Policy Framework (NPPF)[4] and practice guidance[5] currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

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

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

Stages of HRA

1.11 **Table 1.1** summarises the stages involved in carrying out a HRA based on various guidance documents[6],[7]. This report presents the proposed methodology of Stage 1: Screening.

[1] The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.
[2] The network of protected areas identified by the EU: https://ec.europa.eu/environment/nature/natura2000/index_en.htm
[3] https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site
[4] National Planning Policy Framework (NPP) paragraph 1.94, https://www.gov.uk/government/publications/national-planning-policy-framework--2
[5] The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European
[6] UK Government Planning Practice Guidance, available from https://www.gov.uk/guidance/appropriate-assessment
[7] The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/

Table 1.1 Stages in HRA

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	Description of the development plan and confirmation that it is not directly connected with or necessary to the management of Habitats Sites. Identification of potentially affected Habitats Sites and their conservation objectives[8]. Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures[9].	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (the 'Integrity Test')	Information gathering (development plan and data on Habitats Sites[10]). Impact prediction. Evaluation of development plan impacts in view of conservation objectives of Habitats Sites. Where impacts are considered to directly or indirectly affect qualifying features of Habitats Sites, identify how these effects will be avoided or reduced ('mitigation').	Appropriate Assessment report describing the plan, Habitats Site baseline conditions, the adverse effects of the plan on the Habitats Site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

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

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). *[These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.]* If Yes –
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. *[This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1.]*
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the Habitats Site.

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

[8] Conservation objectives are published by Natural England for SACs and SPAs
[9] In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.
[10] In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: http://publications.naturalengland.org.uk/category/5458594975711232

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

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

Case law

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

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

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

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

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

1.19 In undertaking this HRA, LUC will consider the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, will also be considered in this HRA.

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

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

1.21 In addition to this, the HRA will take into consideration the 'Wealden' judgment from the CJEU.

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

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

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

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

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

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

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

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

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

Previous HRA work

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

1.27 These previous HRAs will help to inform this HRA report, where relevant.

Structure of the HRA report

1.28 This chapter has introduced the requirements to undertake the HRA of the West Oxfordshire Local Plan 2041. The remainder of the report is structured as follows:

- Chapter 2: West Oxfordshire Local Plan 2041 summarises the content of the plan that is the subject of this report.
- Chapter 3: Approach to the HRA sets out the methodology followed during the screening and Appropriate Assessment stages of the HRA.
- Chapter 4: HRA Screening describes the findings of the screening stage of the HRA.
- Chapter 5: Conclusions and next steps summarises the HRA screening conclusions and describes the next steps to be undertaken.
- Appendix A: Attributes of Habitats Sites assessed lists relevant features of the SACs, SPAs and Ramsar sites.
- Appendix B: HRA Screening sets out the results of the screening stage for each Local Plan preferred policy option.

Chapter 2
West Oxfordshire Local Plan 2041

Content of the West Oxfordshire Local Plan 2041

2.1 The emerging Local Plan 2041 (Preferred Policy Options Paper) sets out the draft vision and objectives to guide development in West Oxfordshire up to 2041. It will allocate sites for housing, employment and other forms of development and set out a range of policies including core policies, place-based policies, settlement strategies and development management policies.

2.2 The emerging Local Plan 2041 will replace the current Local Plan 2031, adopted in September 2018, which set out the overall planning framework for the district from 2011 to 2031.

2.3 The Local Plan 2041 Preferred Policy Options Paper (hereafter referred to as the Local Plan 2041) articulates a clear vision for the district:

> "In 2041, West Oxfordshire stands as a beacon of sustainable development and community well-being. Our District has embraced a transformative vision, shaping a future that balances environmental stewardship, economic vitality, and social equity. We not only meet the needs of our residents but inspire others to follow our lead in creating a sustainable and inclusive future.
>
> The District is powered entirely by renewable energy sources and innovative green technologies. Energy-efficient buildings, both residential and commercial have become the norm, with retrofitted historic structures showcasing advanced insulation and energy systems. Public transport is carbon-neutral, including electric buses, bike-sharing schemes, and extensive pedestrian zones. Green roofs and vertical gardens are commonplace, contributing to urban cooling and biodiversity.
>
> Communities are thriving, inclusive, and resilient. Health and well-being are prioritised through extensive green spaces, recreational facilities, and community gardens. Access to high-quality healthcare and mental health services is seamless, with integrated community health hubs providing comprehensive care. Social inclusivity is strengthened by community centres that offer programs for all ages, fostering intergenerational connections and support networks. Streets and public spaces are designed for safety and accessibility, ensuring everyone can participate in community life.

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

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

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

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

In 2041, West Oxfordshire is not just a place to live, but a thriving, interconnected community where people enjoy a high quality of life, economic opportunities abound, and the natural and historic environment is cherished and protected. Together, we have created a future that is sustainable, inclusive, and inspiring for generations to come."

Objectives

2.4 The Local Plan 2041 sets out six draft strategic objectives which help to articulate the vision and guide the overall content of the plan and provide a benchmark against which progress can be measured.

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

2.5 Further detail is provided by 12 core policies, 6 place-based policies, 15 settlement and town centre strategies, and 38 development management policies.

Quantum of development

2.6 The Local Plan 2041 sets out the approach regarding the overall quantum of development within Core Policy 4 - Delivering New Homes and Core Policy 5 – Supporting Economic Growth and Local Prosperity. Core Policy 4 - Delivering New Homes intends to make provisions equating to about 16,000 homes in the period 2025 to 2041, met through a variety of supply sources as summarised in Table 2.1.

Table 2.1 Sources of housing supply

Source of homes	Net increase
Large existing planning permissions (>10 dwellings) at 1st April 2025	2,036
Small existing planning permissions (<10 dwellings)	294
Allocated sites	11,700
Windfall allowance	1,950
Total	**16,000**

2.7 Of the 11,700 homes on allocated sites, it is assumed that around 5,200 will be delivered from remaining Local Plan 2031 site allocations and around 6,500 homes from new Local Plan 2041 allocations. However, the Local Plan Preferred Policy Options Paper does not allocate specific sites. It sets out the overall quantum of growth and the broad spatial

strategy, but specific locations for development will be identified in later iterations of the Local Plan. This HRA report therefore assesses the preferred policy options; and the assessment of site allocations (and location-specific effects, more generally) will be undertaken when they are available.

2.8 CP5 – Supporting Economic Growth and Local Prosperity aims to support economic growth by ensuring a sufficient supply of high-quality employment land and floorspace, sourced from existing planning permissions and site allocations. The policy allows for between 0.9ha and 6.4ha of Planning Use Classes E Office, Research & Development, and Light Industrial and 3.5ha and 25ha of B2 General Industrial and B8 Storage and Distribution.

Other related plans and projects

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

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

2.10 Several other neighbourhood plans are currently being prepared.

2.11 There is also an Area Action Plan for Salt Cross Garden Village, which is currently at the Examination stage.

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

2.13 These plans and projects will be considered in relation to in-combination effects, where relevant, when the potential Local Plan development locations (site allocations) are assessed at the next stage of the HRA.

Chapter 3
Approach to HRA

3.1 This chapter explains the approach taken in the screening of the plan's preferred policy options (and which will also be applied to the screening of site allocations, when available); and the approach that will be taken to the Appropriate Assessment, at the next stage.

Screening

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

3.3 The purpose of the screening stage is to:

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

Identification of Habitats Sites that may be affected by the Plan

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

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

also been given to Habitats Sites connected to the plan area beyond this distance, for example through hydrological pathways.

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

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

3.7 Further information on each site is set out in Appendix A. The designated features and conservation objectives of the Habitats Sites, together with current pressures and potential threats, have been established using Data Forms for SACs and SPAs[11] and Information Sheets for Ramsar Wetlands published on the JNCC website[12], as well as Natural England's Site Improvement Plans[13], Supplementary Advice Notes[14] and the most recent conservation objectives published on the Natural England website (most were published in 2014)[15]. This analysis enables Habitats Site interest features to be identified, along with the features of each Habitats Site which determine site integrity and the specific sensitivities and threats facing the site. This information is then used to inform an assessment of how the potential impacts of the Local Plan may result in likely significant effects on each of the Habitats Sites in question, either alone or in-combination.

Functionally linked land (FLL)

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

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

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

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

Amphibians

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

Fish

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

[11] These were obtained from the Joint Nature Conservation Committee and Natural England websites (www.jncc.gov.uk and www.naturalengland.org.uk)
[12] www.jncc.defra.gov.uk
[13] Natural England is in the process of compiling Site Improvement Plans for all Natura 2000 sites in England as part of the Improvement programme for England's Natura 2000 sites (IPENS).
[14] Supplementary Advice Notes, Natural England, (can be found under the relevant Habitats site's Conservation Objectives): http://publications.naturalengland.org.uk/category/6490068894089216
[15] http://publications.naturalengland.org.uk/category/6490068894089216

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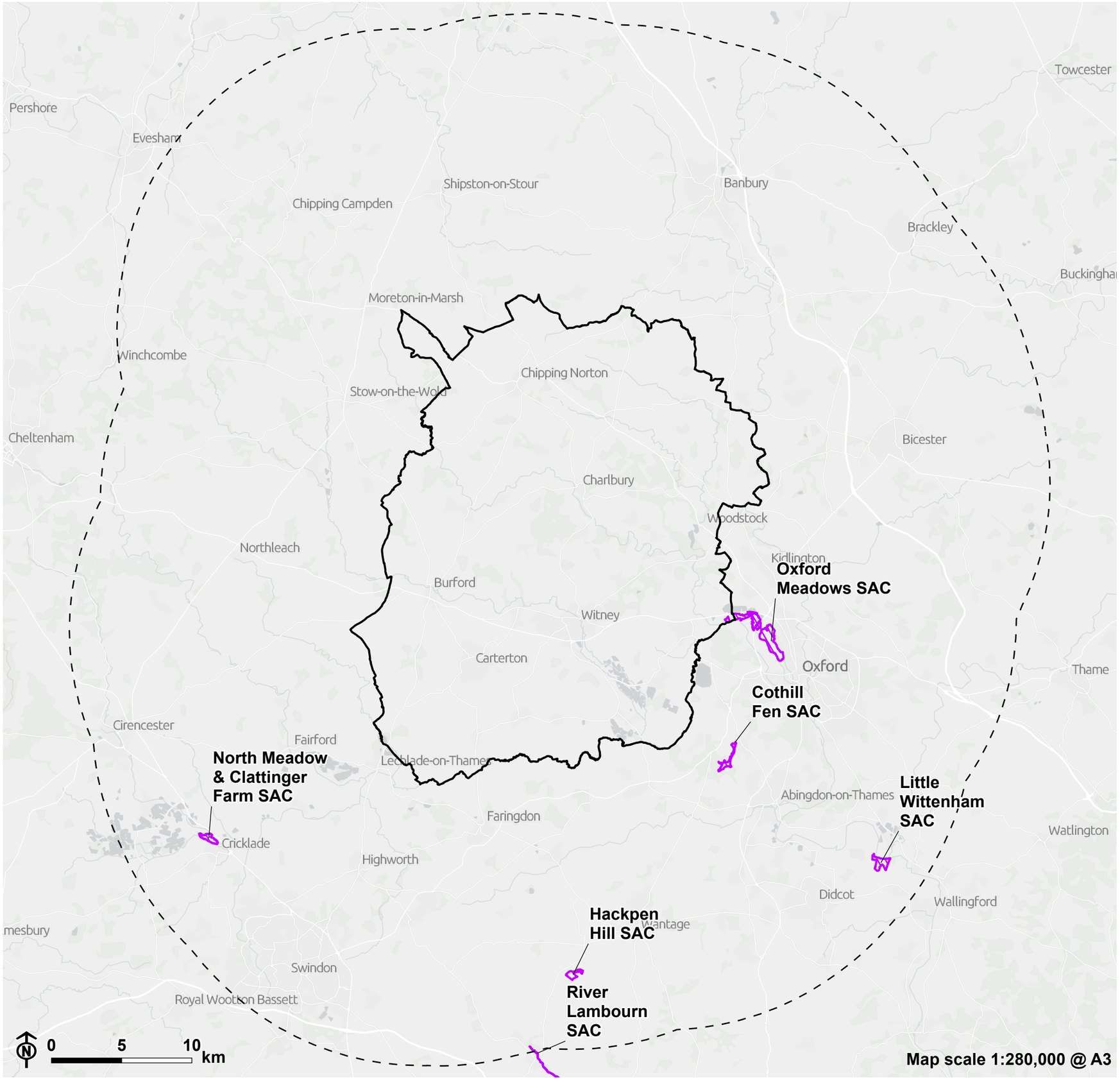
Figure 3.1: Habitats sites within 20km of the plan area



Assessment of 'likely significant effect'

3.14 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017[16] (as amended) (the 'Habitats Regulations'), an assessment will be undertaken of the 'likely significant effects' of the Plan. The assessment is prepared in order to identify which policies (or site allocations) would be likely to have a significant effect on Habitats Sites.

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

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

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

Interpretation of 'likely significant effect'

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

3.18 In the Waddenzee case[17], the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

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

3.20 An opinion delivered to the Court of Justice of the European Union[18] commented that:

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

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

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

In-combination effects

3.23 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where *"a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site"*. Therefore, it will be necessary to consider whether any impacts identified from the Local Plan may combine with other plans or projects to give rise to significant effects in-combination. Where the Local Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Local Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Local Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would have an adverse effect on integrity of the relevant Habitats Site. Where the screening assessment concludes that there is no impact pathway between development proposed in the Local Plan and the conditions necessary to maintain qualifying features of a Habitats Site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with practice guidance on HRA[19].

[16] SI No. 2017/2012
[17] ECJ Case C-127/02 "Waddenzee" Jan 2004.
[18] Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.
[19] The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document [online] Available at: https://www.dtapublications.co.uk/handbook/European

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

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

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

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

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

Screening assessment

3.28 A screening matrix is prepared (see Appendix B), which considers the potential for likely significant effects resulting from each policy in the Local Plan (and site allocations) that may contribute to each type of impact. A 'traffic light' approach is used in the screening matrix to record the likely impacts of each policy (and site allocation) on Habitats Sites and their qualifying habitats and species, using the colour categories shown below.

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

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

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

Appropriate Assessment

3.31 Following the screening stage, if likely significant effects of the Local Plan (alone or in-combination) on Habitats Sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an 'Appropriate Assessment' of the implications of the plan for Habitats Sites, in view of their conservation objectives. EC Guidance[20] states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of Habitats Sites with respect to their conservation objectives and to their structure and function.

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

Assessing the effects on site integrity

3.33 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. the habitats and species for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that the effects on

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

species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of Habitats Sites also need to be considered. The Appropriate Assessment, if required, will refer to the information set out in **Appendix A** of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

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

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

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features.[21]

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

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

3.38 The Appropriate Assessment will be undertaken where relevant during the next stages of the HRA.

[21] Ibid.

Chapter 4
HRA Screening

4.1 The purpose of HRA Screening is to identify the likely significant effects of the Local Plan's policies (and site allocations, when available); and to identify the scope of any Appropriate Assessment work required. The current HRA Screening assessment of the Local Plan 2041 policy options contained in the Preferred Policy Options Paper is presented in full within Appendix B and is summarised below.

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

Screening of preferred policy options

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

- CP2 Settlement Hierarchy;
- CP3 Spatial Strategy;
- CP6 Delivering Infrastructure In-Step with New Development;
- CP7 Water Environment;
- CP8 High Quality and Sustainable Design;
- CP9 Health Place Shaping;
- CP10 Sustainable Transport;
- CP11 Historic Environment;
- CP12 Natural Environment;
- PL1 Cotswolds National Landscape;
- PL2 Oxford Green Belt;
- PL3 Conservation and Management of the Windrush Valley;
- PL4 Wychwood Forest;
- PL5 Carterton – Witney – Oxford Rail Corridor (CWORC);

- PL6 Blenheim Palace World Heritage Site;
- WIT1 A Strategy for Witney;
- WIT2 Witney Town Centre;
- CA1 A Strategy for Carterton;
- CA2 Carterton Town Centre;
- CN1 A Strategy for Chipping Norton;
- CN2 Chipping Norton Town Centre;
- BAM1 A Strategy for Bamford;
- BUR1 A Strategy for Burford;
- BUR2 Burford Town Centre;
- CHA1 A Strategy for Charlbury;
- EYN1 A Strategy for Eynsham;
- LH1 A Strategy for Long Hanborough;
- WD1 A Strategy for Woodstock;
- WD2 Woodstock Town Centre;
- DM1 Key Principles for New Development;
- DM5 Achieving Net Zero Carbon Development;
- DM7 Retrofitting for Energy Efficiency, Carbon Reduction and Resilience;
- DM8 Biodiversity Net Gain (BNG);
- DM10 Conserving and Enhancing Landscape Character through New Development;
- DM11 Trees and Hedgerows;
- DM12 Light Pollution and Dark Skies;
- DM13 Air Quality and Pollution;
- DM14 Listed Buildings;
- DM15 Conservation Areas;
- DM16 Archaeology and Scheduled Monuments;
- DM17 Registered Historic Parks and Gardens;
- DM19 Non-Designated Heritage Assets;
- DM20 Town Centres;
- DM21 Previously Development Land and Development Densities;
- DM24 Active and Healthy Travel;
- DM25 Parking Standards for New Development (Car and Cycle Parking);
- DM27 Creating Mixed and Balanced Communities;
- DM28 Affordable Housing;
- DM29 Specialist Housing for Older People;
- DM30 Custom and Self-Build Housing;
- DM31 Community-Led Housing; and
- DM38 Digital Connectivity and Home/Co-Working Space.

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

- DM2 Green Infrastructure;
- DM4 A Healthy Food Environment;
- DM6 Renewable and Low Carbon Energy Development;
- DM18 Conversion, Extension and Alteration of Traditional Buildings (single building extensions or conversions);
- DM22 Re-use of Non-Residential Buildings (single building changes of use); and
- DM33 Loss, Replacement and Sub-Division of Existing Dwellings (single building subdivision, extension and changes of use).

4.5 Several of the preferred policy options screened out also include measures that may contribute to mitigation for impacts associated with other policies in the plan. These are identified in Appendix B and will be taken into account in the Appropriate Assessment.

4.6 The following preferred policy options have been screened in for further assessment in the Appropriate Assessment, as they have likely significant effects:

- CP1 Climate change (renewable energy development);
- CP4 Delivering New Homes
- CP5 Supporting Economic Growth and Local Prosperity
- DM3 Sport, Recreation and Play
- DM9 Waste and the Circular Economy (waste management infrastructure);
- DM23 Protection and Provision of Community Facilities and Services;
- DM26 Windfall Housing;
- DM32 Meeting the Needs of Travelling Communities;
- DM34 Provision and Protection of Land for Employment;
- DM35 Learning, Skills and Training;

- DM36 Supporting the Rural Economy; and
- DM37 Sustainable Tourism.

4.7 It is likely that all proposed draft site allocations will be screened in as they will all contribute to one or more effects on Habitats Sites, e.g. air pollution (in combination with other plans/projects); however this will be confirmed when the draft site allocations are available to assess at the next stage of the HRA.

4.8 Further details of the impact pathways associated with these policies and an explanation of the potential for likely significant effects identified is set out below.

Physical damage and loss of habitat

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

4.10 Any development resulting from the Local Plan would take place within the district; therefore, only Habitat Sites within or on the West Oxfordshire District boundary could be affected by direct physical damage or loss of habitat within the site boundaries.

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

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

- CP1 Climate Change;
- CP4 Delivering New Homes;
- CP5 Supporting Economic Growth and Local Prosperity;
- DM3 Sport, Recreation and Play;
- DM9 Waste and the Circular Economy;
- DM23 Protection and Provision of Community Facilities and Services;
- DM26 Windfall Housing Development on Unallocated Sites;
- DM32 Meeting the Needs of Travelling Communities;
- DM34 Provision and Protection of Land for Employment;
- DM35 Learning, Skills and Training;
- DM36 Supporting the Rural Economy; and
- DM37 Sustainable Tourism.

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

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

Bird strike

4.14 Wind turbines have the potential to impact upon bird or bat species. However, although policies within the plan do permit renewable energy development, none of the Habitats Sites within 20km of the plan area have qualifying bird/bat species.

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

Non-physical disturbance

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

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

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

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

4.19 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation with Natural England) that the effects of noise, vibration, visual disturbance, light pollution and odour are capable of causing an adverse effect if development takes place within 500m of a

Habitats Site or functionally linked habitats, where there are qualifying features sensitive to these disturbances.

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

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

Air pollution

Dust

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

4.22 The effects of dust are most likely to be significant if development takes place within 500m of a Habitats Site with qualifying features sensitive to these disturbances, such as riparian and wetland habitats, or sites designated for habitats and plant species. This is the distance that, in our experience, provides a robust assessment of effects in plan-level HRA and meets with the agreement of Natural England.

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

4.24 Policies which permit development in un-specified areas (see paragraph 4.12), could also in theory result in development and therefore dust within 500m of Oxford Meadows SAC. Impacts on Oxford Meadows SAC have therefore been screened in on a precautionary basis.

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

Vehicle emissions

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

4.26 Increases in nitrogen deposition, nitrogen oxides (NOx), ammonia (NH_3) and acid deposition can all arise from vehicle emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

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

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

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

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- Daily average speed will change by 10 km/hr or more; or
- Peak hour speed will change by 20 km/hr or more; or
- Road alignment will change by 5 m or more.

4.30 Where significant increases in traffic are possible on roads within 200m of Habitats Sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely

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

[23] Standards for Highways (2019). Design Manual for Roads and Bridges: LA105 Air Quality, https://www.standardsforhighways.co.uk/tses/attachments/10191621-07df-44a3-892e-c1d5c7a28d90

to be significant. In line with the Wealden judgment[24], the traffic growth considered by the HRA should be based on the effects of development provided for by the Local Plan in combination with other drivers of growth such as development proposed in neighbouring authorities and demographic change.

4.31 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development, i.e. greater than 1,000 AADT; although there are sometimes exceptions (which will be confirmed through traffic assessment).

4.32 The only Habitats Sites within 10km of the plan area and within 200m of a main road are listed below with the strategic roads that are within 200m:

- Oxford Meadows SAC (partially within east of plan area): A40 and A34.

4.33 All other Habitats Sites are situated over 10km from the plan area or over 200m from key strategic roads and are therefore currently screened out. If traffic data indicates that there are minor roads that would experience significant increases in traffic flows (>1,000AADT), then these would be screened into the HRA.

4.34 The following policies (and likely all of the Local Plan draft site allocations, although this will be confirmed when they are assessed) would contribute to an increase in traffic and therefore could contribute to air pollution on roads within 200m of Oxford Meadows SAC:

- CP4 Delivering New Homes;
- CP5 Supporting Economic Growth and Local Prosperity;
- DM3 Sport, Recreation and Play;
- DM23 Protection and Provision of Community Facilities and Services;
- DM26 Windfall Housing;
- DM32 Meeting the Needs of Travelling Communities;
- DM34 Provision and Protection of Land for Employment;
- DM35 Learning, Skills and Training;
- DM36 Supporting the Rural Economy; and
- DM37 Sustainable Tourism.

4.35 Traffic data are not currently available to screen the Local Plan policies (and site allocations) against the DMRB criteria. Traffic data has been commissioned for the roads within 200m of Oxford Meadows SAC (and Cothill Fen SAC, which only has minor roads within 200m; and Aston Rowant SAC, which is >10km from West Oxfordshire) as part of the Habitats Regulations Assessment of the Joint Local Plan for South Oxfordshire and Vale of White Horse. West Oxfordshire Council will be able to make use of this data, once available.

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

Industrial emissions

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

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

4.38 Environment Agency guidance on environmental permitting[25] uses a distance of 10km to screen the potential for effects on Habitats Sites from industrial emissions. Habitats Sites within 10km of the plan area that are sensitive to air pollution are:

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

4.39 Point sources of air pollutants could arise from industrial development associated with the following policies:

- CP5 Supporting Economic Growth and Job Creation, which is safeguarded employment land.

4.40 Industrial emissions are subject to environmental permitting; however, as mitigation cannot be taken into at the Screening stage, industrial emissions are screened in as a precaution.

There is the potential for likely significant effects at Oxford Meadows SAC and Cothill Fen SAC, due air pollution from industry. These are likely to be significant

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

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

due to the Local Plan in combination with other plans/projects. This impact has been screened in.

Changes in water quantity or quality

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

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

Increased demand for water (abstraction)

4.42 Mains water is supplied to West Oxfordshire by Thames Water. Thames Water's Water Resource Management Plan 2024[26] states that sources of water in Oxfordshire are:

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

4.43 Farmoor Reservoir is west of Oxford and not hydrologically linked to any Habitats Site. Oxford Meadows SAC and Little Wittenham SAC are both adjacent to the River Thames and likely to be hydrologically linked. Other Habitats Sites are not hydrologically linked to the Thames and would not be affected by abstraction for water supply.

4.44 All of the Local Plan policies (and draft site allocations, once assessed) that will result in residential or employment development could increase demand for water in West Oxfordshire and could potentially impact upon water levels at Oxford Meadows SAC and/or Little Wittenham SAC.

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

Increased need for water treatment

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

4.46 Wastewater from West Oxfordshire is treated at a number of Wastewater Treatment Works (WwTWs)[27], including at Burford (River Windrush), Witney (River Windrush), and Carterton (Shill Brook), which are all on tributaries of the River Thames, upstream of Oxford and therefore Oxford Meadows SAC and Little Wittenham SAC.

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

- CP4 Delivering New Homes;
- CP5 Supporting Economic Growth and Local Prosperity;
- DM3 Sport, Recreation and Play;
- DM23 Protection and Provision of Community Facilities and Services;
- DM26 Windfall Housing;
- DM32 Meeting the Needs of Travelling Communities;
- DM34 Provision and Protection of Land for Employment;
- DM35 Learning, Skills and Training;
- DM36 Supporting the Rural Economy; and
- DM37 Sustainable Tourism.

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

[26] Thames Water (2024) Water Resources Management Plan, https://www.thameswater.co.uk/about-us/regulation/water-resources
[27] Southwest Environment Ltd (2025) Thames Water Sewage Treatment Works map, https://southwest-environmental.co.uk/further%20info/in%20depth/sewage_works_maps/thames_water_sewage_treatment_works_location_maps.html

Direct pollution (run-off)

4.48 Direct pollution may occur if development is very close to or upstream of a Habitats Site, or watercourses connected to it. In this case, it is only Oxford Meadows SAC and Little Wittenham SAC that are within the plan area and/or downstream of the plan area.

4.49 In addition, policies which permit development in un-specified areas (see paragraph 4.12), could also in theory result in development and therefore direct pollution (run-off) within 500m of Oxford Meadows SAC or the River Thames upstream of Oxford Meadows SAC and Little Wittenham SAC. Impacts on Oxford Meadows SAC and Little Wittenham SAC have therefore been screened in on a precautionary basis.

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

Recreation pressure

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

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

4.52 The River Lambourn SAC (19.6km from plan area) is a chalk stream unlikely to be used for significant water-based recreation. At Little Wittenham SAC (16km from plan area), the qualifying feature is great crested newts, which make use of supporting habitats at the site. However, for other HRAs in Oxfordshire, Natural England has advised[28] that great crested newts are not particularly sensitive to recreation pressure; and access is managed by The Earth Trust, to draw visitors away from the most sensitive areas. Recreation pressure at these sites can therefore be screened out.

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

4.54 The following Local Plan policies (and likely the Settlement Strategies / Place Based policies and their associated site allocations, once assessed) include provision for new homes or overnight accommodation, which could increase pressure on recreation destinations:

- CP4 Delivering New Homes
- DM26 Windfall Housing;
- DM32 Meeting the Needs of Travelling Communities; and
- DM37 Sustainable Tourism.

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

4.56 In contrast to coastal Habitats Sites, the ZOI for non-coastal Habitats Sites are typically less variable, with visitors travelling from areas more local to the site. Although these sites are unique in their own right, they do not have the same draw as coastal sites and with recreational activities more easily managed and directed to alternative greenspace in the area. Using a precautionary approach and based on ZOIs[29] established for other Habitats Sites around the country, a ZOI of 7km has been applied to Habitats Sites where alternative ZOI are not known.

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

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

[29] Natural England (2024) RP04518 Edition 1 Compilation and Review of Evidence Leading to SANG and SAMM Provision, https://publications.naturalengland.org.uk/publication/6015060338802688

4.58 For other sites, there are no visitor surveys (or no recent survey) from which a ZOI can be established, and a ZOI of 7km has been used.

4.59 Hackpen Hill SAC is 14.3km from the plan area; therefore recreation pressure can be screened out for this site. The two Habitats Sites that have ZOIs within West Oxfordshire are:

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

4.60 The location of development will be screened more fully once the site allocations are available, at the next stage of the HRA.

4.61 In addition, policies (or site allocations, once assessed) which permit residential / overnight development in un-specified areas, could also in theory result in development and therefore recreation pressure:

- CP4 Delivering New Homes
- DM26 Windfall Housing;
- DM32 Meeting the Needs of Travelling Communities; and
- DM37 Sustainable Tourism.

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

Summary of screening

4.62 Table 4.1 summarises the HRA screening, by impact pathway and Habitats Site. Impact pathways screened in will be subject to Appropriate Assessment.

4.63 Non-physical disturbance and bird strike were screened out for all Habitats Sites.

Table 4.1 Summary of HRA Screening of policies

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

Chapter 5
Conclusions and next steps

5.1 The HRA Screening has identified that 12 preferred policy options will require Appropriate Assessment to consider whether there will be adverse effects on Habitats relating to:

- Physical damage and loss of habitats
- Air pollution – dust;
- Air pollution - vehicle emissions;
- Air pollution – industrial emissions;
- Water quality / quantity – abstraction;
- Water quality / quantity – wastewater treatment;
- Water quality / quantity – direct pollution; and
- Recreation pressure.

5.2 Oxford Meadows SAC is at risk from all of the above impact pathways. Cothill Fen SAC to industrial emissions and recreation pressure; and Little Wittenham SAC to effects relating to water quality / quantity.

5.3 At the next stage of the HRA, once the draft site allocations are available, the screening will be re-visited; for example to consider location-specific effects and in-combination effects.

5.4 It is likely that many of the identified effects will be mitigated by safeguards within policy or legislation, for example permitting requirements (industrial emissions, abstraction and wastewater treatment), policies that protect biodiversity (damage/loss of habitat) and pollution control measures (dust, direct pollution). However, as mitigation cannot be taken into account at the Screening stage, these safeguards will be considered as part of the Appropriate Assessment.

5.5 The following are likely to be considered in greater detail in the Appropriate Assessment:

- Air pollution – vehicle emissions – at Oxford Meadows SAC: the Council expect to commission and utilise, where available, other existing traffic data and air quality assessment to quantify the effect of air pollution on this site due to the West Oxfordshire Local Plan and the plans of neighbouring authorities.
- Recreation pressure at Oxford Meadows SAC: screening of this impact is dependent on the location of development, so will be completed once the site

allocations are available. However, as there are Habitats Sites -Oxford Meadows SAC and Cothill Fen SAC - with (estimated) zones of influence that overlap with the plan area, it is likely that the Appropriate Assessment will include and assessment of recreation pressure.

LUC

June 2025

Appendix A

Attributes of Habitats Sites Assessed

Oxford Meadows SAC

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

Table A.1 Attributes of Oxford Meadows SAC

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

Cothill Fen SAC

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

Table A.2 Attributes of Cothill Fen SAC

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

North Meadow and Clattinger Farm SAC

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

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

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

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

Hackpen Hill SAC

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

Table A.4 Attributes of Hackpen Hill SAC

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

Little Wittenham SAC

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

Table A.5 Little Wittenham SAC

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

River Lambourn SAC

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

Table A.6 River Lambourn SAC

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

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

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

Appendix B
HRA Screening

Table B.1 Screening matrix - policies

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
CP1 – Climate Change	Renewable energy infrastructure (wind turbines, solar)	Bird strike Visual disturbance Physical damage to or loss of habitat Direct pollution / run-off Air pollution - dust	Yes None of the Habitat Sites within 20km of the plan area are designated for bird species or species vulnerable to visual disturbance. However, the location of potential development is currently unknown; therefore there may be effects associated with proximity to a Habitats Site. The policy encourages the following measures that could provide mitigation for impacts associated with other policies in the plan: ■ All new development must consider… sustainable transport links and active travel infrastructure to reduce reliance on fossil fuel-based transport. ■ Water efficiency: All new development must incorporate water-efficient technologies, such as rainwater harvesting systems, low-flow plumbing, and smart irrigation systems, to reduce water consumption and ensure a sustainable water supply in the case of climate variability. ■ Development proposals must: Incorporate green infrastructure to increase biodiversity, improve air quality, and reduce heat effects; promote sustainable land use by protecting and restoring natural habitats, woodlands, wetlands, and other green spaces that provide climate resilience benefits; and enhance biodiversity by integrating wildlife corridors and promoting biodiversity in urban and rural settings.
CP2 – Settlement Hierarchy	None	None	No This policy establishes a clear settlement hierarchy for the District, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations will be assessed in relation to draft site allocations.
CP3 – Spatial Strategy	None	None	No This policy explains the reasoning why development is prioritised in some areas, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations will be assessed in relation to draft site allocations.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
CP4 – Delivering New Homes (Underpinned by housing need of 905 homes per year in the period 2025 – 2041 or 14,480 in total. 10% buffer added to increase planned supply to around 16,000 homes.)	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes. This policy defines the overall housing requirement of 14,480 new homes, with a planned supply of 16,000 dwellings, including a 10% buffer, proposed as part of the plan, and therefore will contribute to effects largely relating to overall population increase, such as recreation pressure, air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
CP5 – Supporting Economic Growth and Local Prosperity (0.9ha to 6.4ha of Planning Use Classes E Office, Research & Development, and Light Industrial; and 3.5ha to 25ha of B2 General Industrial and B8 Storage and Distribution)	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution - dust; vehicle and industrial emissions Changes in water quality / quantity Loss of or damage to habitats	Yes. This policy defines the overall employment requirement of up to 31.4ha of office/R&D/industrial uses and therefore will contribute to effects such as air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
CP6 - Delivering Infrastructure In-Step with New Development	None	None	No This policy explains how infrastructure will be delivered alongside development (e.g. planning controls and infrastructure delivery plans), but will not itself result in new development.
CP7 - Water Environment	None	None	No This policy sets out requirements for the protection of the water environment and will not result in new development. The policy includes the following, which may contribute to mitigation: ■ All new development proposals must adopt a sustainable and integrated approach to water management. This includes the management of flood risk from all sources, the provision of blue infrastructure, water-sensitive design, and the implementation of sustainable drainage systems (SuDS). Developments must be designed to mitigate water-related risks, enhance water quality, and promote water conservation in line with the environmental objectives of the District.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			■ Development must consider both water supply and demand, ensuring water efficiency and resilience to future supply challenges. Proposals for new dwellings must meet a target of no more than 90 litres per person per day of water use. ■ All proposals must demonstrate full consideration of wastewater management and water quality, ensuring that development does not adversely impact water bodies or aquatic ecosystems. A focused local strategy must be submitted with major development applications, outlining: How wastewater will be managed, including the treatment and discharge process. Measures to ensure compliance with water quality standards set out by local and national regulations. Any necessary infrastructure improvements to accommodate increased demand on wastewater treatment facilities. Strategies to prevent water pollution during and after construction, safeguarding local rivers, streams, and groundwater. ■ Major developments must be accompanied by a site-specific water management strategy that outlines the integrated measures being taken to address water use, flood risk, water efficiency, and water quality. This strategy should also detail how long-term maintenance and monitoring of water infrastructure will be managed, ensuring its resilience and effectiveness.
CP8 - High Quality and Sustainable Design	None	None	No The policy sets qualitative design and sustainability standards for development brought forward under other policies, and in itself will not result in new development
CP9 - Healthy Place Shaping	None	None	No This policy sets a framework for ensuring that development coming forward under other policies contributes positively to public health and well-being, and in itself will not result in new development
CP10 - Sustainable Transport	None	None	No This policy is intended to reduce travel by fossil fuelled vehicles and encourages new transport infrastructure but will not itself result in new development. New development will be assessed in relation to the draft site allocations.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
CP11 - Historic Environment	None	None	No This policy provides a framework for assessing and managing the impact of development on heritage assets, ensuring conservation and enhancement of historic character, and in itself will not result in new development
CP12 - Natural Environment	None	None	No This policy ensures that all new development in West Oxfordshire actively contributes to the protection, enhancement, and recovery of the District's natural environment, and will not result in new development. The policy includes the following, which may contribute to mitigation: ■ All major development proposals will be required to demonstrate that they: - Avoid harm to important habitats, species, and ecological networks, including those identified as part of the Oxfordshire Local Nature Recovery Strategy. [and enhance biodiversity, in line with the LNRS] ■ All major developments must be accompanied by a comprehensive Ecological Impact Assessment (EcIA) that evaluates the potential impacts of the development on local wildlife, habitats, and ecosystems. The EcIA must identify opportunities for mitigating any negative effects and enhancing the natural environment. In cases where significant impacts on biodiversity cannot be avoided, the development must implement an effective mitigation or compensation strategy consistent with the principles of the Oxfordshire Local Nature Recovery Strategy.
PL1 - Cotswolds National Landscape	None	None	No This policy ensures that development within and around the Cotswolds National Landscape conserves and enhances its natural beauty, special qualities, and scenic and cultural heritage, while safeguarding its biodiversity and tranquillity, and in itself will not result in new development
PL2 - Oxford Green Belt	None	None	No

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			This policy sets the framework under which development may be permitted within the Green Belt, using a sequential and restrictive approach, and in itself will not result in new development
PL3 - Conservation and Management of the Windrush Valley	None	None	No This policy guides development proposals and land management within the Windrush Valley, supporting the conservation, restoration, and flood management within Windrush Valley, and in itself will not result in new development The policy includes the following, which may contribute to mitigation: ■ All proposals across the Windrush Valley must: Demonstrate how they contribute to the strategic objectives of natural flood management, heritage conservation, biodiversity enhancement, and the objectives of the Upper and Lower Windrush Valley Conservation Target Areas (CTAs). Avoid harm to the valley's ecological and visual integrity, incorporating mitigation measures where necessary to safeguard the quality of watercourses, including the River Windrush.
PL4 - Wychwood Forest	None	None	No This policy ensures that development within the Wychwood Forest area contributes to the restoration and protection of habitats, enhances local biodiversity, and in itself will not result in new development. The policy includes the following, which may contribute to mitigation: ■ Development within or adjacent to the Wychwood Forest area must prioritise the protection, restoration, and enhancement of key habitats, including ancient woodlands, heathlands, grasslands, and wetland areas. ■ Development proposals must be supported by a comprehensive ecological and landscape impact assessment. ■ Proposals for new development must: Contribute to the enhancement and expansion of green infrastructure, including the creation of wildlife corridors and ecological linkages to support movement of species across the landscape.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
PL5 - Carterton – Witney – Oxford Rail Corridor (CWORC)	None	None	No This policy safeguards a corridor for the potential future delivery of a strategic rail solution, but in itself will not result in new development.
PL6 - Blenheim Palace World Heritage Site	None	None	No This policy places control to ensure the protection, conservation, and enhancement of Outstanding Universal Value (OUV) of Blenheim Palace World Heritage Site, and will not result in new development.
WIT1 - A Strategy for Witney	None	None	No This policy sets out the overarching aims for Witney but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
WIT2 - Witney Town Centre	None	None	No This policy sets out the overarching aims for Witney town centre but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
CA1 – A Strategy for Carterton	None	None	No This policy sets out the overarching aims for Carterton but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
CA2 - Carterton Town Centre	None	None	No This policy sets out the overarching aims for Carterton town centre but will not itself result in new development. Development location will be assessed in relation to the draft site allocations
CN1 – A Strategy for Chipping Norton	None	None	No This policy sets out the overarching aims for Chipping Norton but will not itself result in new development. Development location will be assessed in relation to the draft site allocations
CN2 - Chipping Norton Town Centre	None	None	No

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			This policy sets out the overarching aims for Chipping Norton town centre but will not itself result in new development. Development location will be assessed in relation to the draft site allocations
BAM1 – A Strategy for Bampton	None	None	No This policy sets out the overarching aims for Bampton but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
BUR1 – A Strategy for Burford	None	None	No This policy sets out the overarching aims for Burford but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
BUR2 – Burford Town Centre	None	None	No This policy sets out the overarching aims for Burford town centre but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
CHA1 – A Strategy for Charlbury	None	None	No This policy sets out the overarching aims for Charlbury but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
EYN1 – A Strategy for Eynsham	None	None	No This policy sets out the overarching aims for Eynsham but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
LH1 – A Strategy for Long Hanborough	None	None	No This policy sets out the overarching aims for Long Hanborough but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
WD1 – A Strategy for Woodstock	None	None	No This policy sets out the overarching aims for Woodstock but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
WD2 – Woodstock Town Centre	None	None	No

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			This policy sets out the overarching aims for Woodstock town centre but will not itself result in new development. Development location will be assessed in relation to the draft site allocations.
RA1 - Rural Areas Strategy	None	None	No This policy sets out the overarching aims for the villages and hamlets in West Oxfordshire, which informs where development will be prioritised under other policies, but in itself will not result in new development. Development locations are assessed in relation to the draft site allocations.
DM1 - Key Principles for New Development	None	None	No This policy sets out a series of key principles which all new development will be expected to adhere to in the interests of good planning and protecting and enhancing the District's built and natural environment, and local communities, but in itself will not result in new development
DM2 - Green Infrastructure	Green infrastructure	None	No This policy requires developments to contribute to the provision of new green infrastructure but will not increase traffic or visitor numbers to Habitats Sites. The policy includes the following, which may contribute to mitigation: ■ For strategic development sites of more than 300 homes, around 50% of the site area should contribute to the overall green infrastructure network. This includes communal open spaces, parks, green corridors, water features, and other multi-functional green and blue spaces. ■ Development proposals must have regard to Natural England's Green Infrastructure Framework, including the Green Infrastructure Standards and the 15 Green Infrastructure Principles, ensuring they contribute meaningfully to the wider network.
DM3 - Sport, Recreation and Play	Sport, recreation and play development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports and facilitates the delivery of new sport, recreation, and play infrastructure as part of new residential or mixed-use development; and therefore could contribute to effects related to changes in vehicle movements (air pollution) and possibly also water abstraction/treatment, depending on the nature of the facility.

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			Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM4 - A Healthy Food Environment	Green and blue infrastructure	None	No This policy encourages food growing opportunities, and defines broad locations for food retail and take-aways, but will not result in development that could have likely significant effects.
DM5 – Achieving Net Zero Carbon Development	None	None	No Sets out the approach to reducing carbon emissions from new developments, but in itself will not result in new development
DM6 - Renewable and Low Carbon Energy Development	Renewable energy infrastructure (wind turbines, solar)	Bird strike Visual disturbance	No None of the Habitats Sites within 20km of the plan area are designated for bird species or species vulnerable to visual disturbance.
DM7 - Retrofitting for Energy Efficiency, Carbon Reduction and Resilience	None	None	No Sets out the approach to retrofitting existing buildings for energy efficiency, but in itself will not result in new development
DM8 - Biodiversity Net Gain (BNG)	None	None	No This policy sets out a mitigation hierarchy and BNG principles/targets and will not result in new development. The policy includes the following, which may contribute to mitigation: ■ All development proposals must follow the mitigation hierarchy to address biodiversity impacts: [Avoid, Minimise, Mitigate, Compensate]. ■ Green Infrastructure and Designated Sites: In addition to conservation target areas, financial contributions may be used for the creation of green infrastructure, nature recovery, and the enhancement of designated sites, including Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), and areas identified for habitat restoration or species recovery.

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DM9 - Waste and the Circular Economy	Waste management infrastructure Changes in vehicle traffic (HGVs)	Non-physical disturbance (odour) Air pollution – dust and vehicle emissions Loss of or damage to habitats Direct pollution / run-off	Yes None of the Habitats Sites are designated for species that would be affected by odour from waste management infrastructure within individual developments. Changes in vehicle traffic are assessed in relation to the associated residential/employment developments, rather than separately; traffic data typically takes into account vehicle mix, e.g. a proportion of HGVs for servicing developments. However, depending on the location of new development, there may be effects related to proximity to a Habitats Site.
DM10 - Conserving and Enhancing Landscape Character through New Development	None	None	No This policy ensures that new development conserves and enhances the character and quality of the surrounding landscape, and will not result in new development
DM11 - Trees and Hedgerows	None	None	No This policy sets out principles for the protection and enhancement of trees and hedgerows, and will not results in new development. The policy includes the following, which may contribute to mitigation: ■ Where possible, existing trees and hedgerows should be retained and incorporated into development proposals.
DM12 - Light Pollution and Dark Skies	None	None	No This policy sets out principles for the reduction of light pollution and protection of dark skies, and will not results in new development. The policy includes the following, which may contribute to mitigation: ■ Wildlife Considerations: New development must consider the potential impact of lighting on wildlife habitats, especially where these areas are known to support protected species. Developers should incorporate design features that minimise the effects of lighting on sensitive species, such as low-light zones, lighting shields, and light-curtaining techniques.

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			■ Lighting Buffer Zones: Where new development is proposed near sensitive habitats (such as wetlands, woodlands, or wildlife corridors), a buffer zone should be maintained that limits the use of lighting and reduces its impact on biodiversity.
DM13 - Air Quality and Pollution	None	None	No This policy ensures new development contributes to the protection and improvement of air quality. The policy includes the following, which may contribute to mitigation: ■ Development proposals that individually or cumulatively could lead to a deterioration in air quality, particularly in or near the following sensitive areas, will be subject to stricter scrutiny and mitigation requirements:…b) The Oxford Meadows Special Area of Conservation (SAC), which is sensitive to nitrogen deposition and other air pollution effects due to its internationally designated habitats. ■ An Air Quality Impact Assessment (AQIA) will be required for: a) All major developments. b) Any development likely to result in a significant increase in vehicle traffic or emissions (e.g. from heating, industrial uses). c) Any development located within or near an AQMA or the Oxford Meadows SAC. d) Proposals that form part of a larger cumulative development likely to impact local or strategic air quality levels. The AQIA must assess the potential impacts on local air quality during both construction and operation, taking into account cumulative effects with other planned or existing developments. It should model pollutant levels where appropriate and evaluate impacts on human health and ecological receptors. ■ Where an AQIA identifies likely significant adverse impacts on air quality, appropriate and proportionate mitigation must be secured through the planning process. Measures may include, but are not limited to: a) Sustainable transport infrastructure (e.g. walking, cycling, EV charging). b) Reduced car dependency and traffic management schemes. c) Low-emission building design, heating systems and energy sources. d) Landscaping and green infrastructure to support pollutant absorption. e) Off-site mitigation contributions, where on-site measures are insufficient. In or near the Oxford Meadows

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			SAC, developments must demonstrate compliance with the Habitat Regulations and ensure no adverse effect on the integrity of the protected site from air pollution, either alone or in combination with other plans or projects. ■ Construction phase control: …Particular care must be taken in or near the AQMAs and the Oxford Meadows SAC, where enhanced construction-phase controls may be required due to increased sensitivity.
DM14 - Listed Buildings	None	None	No This policy provides safeguards developments for existing listed buildings
DM15 - Conservation Areas	None	None	No This policy ensures the conservation or enhancement of conservation areas
DM16 - Archaeology and Scheduled Monuments	None	None	No This policy ensures that development proposals conserve or enhance Scheduled Monuments and non-designated remains of national significance.
DM17 - Registered Historic Parks and Gardens	None	None	No This policy safeguards and enhances the special historic interest, character, and setting of Registered Historic Parks and Gardens
DM18 – Conversion, Extension and Alteration of Traditional Buildings	Single building extensions or conversions Changes in vehicle traffic Water abstraction / discharge	Recreation pressure Air pollution Changes in water quality / quantity	No This policy sets out the limited circumstances within which conversion, extension, and alteration of traditional buildings would be permitted. Single building extensions or conversions could slightly increase the number of people living in a single residence, but not to the extent that there would be likely significant effects.
DM19 - Non-Designated Heritage Assets	None	None	No This policy sets out additional planning requirements and design principles to ensure that new developments will enhance heritage assets but will not itself result in new development.
DM20 - Town Centres	None	None	No

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			This policy defines principles for development within town centres but will not itself result in new development.
DM21 - Previously Developed Land and Development Densities	None	None	No This policy sets principles for prioritising development e.g. on brownfield land and urban areas but will not itself result in new development. Development location is assessed in relation to the draft site allocations.
DM22 - Re-use of Non-Residential Buildings	Single building changes of use Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity	No This policy encourages the re-use of traditional buildings, and defines the circumstances in which this would be permitted. Single building changes of use could slightly increase the number of people living in a single residence, but not to the extent that there would be likely significant effects.
DM23 - Protection and Provision of Community Facilities and Services	Community facilities and services Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports new or enhanced community facilities. Depending on the nature of the facilities, this could increase/alter traffic flows and demand for waste supply and treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM24 - Active and Healthy Travel	None	None	No This policy encourages active travel (e.g. walking/cycling infrastructure) but will not itself result in new development. New development is assessed in relation to the draft site allocations.
DM25 – Parking Standards for New Development (Car and Cycle Parking)	None	None	No This policy sets out standards and requirements for car and cycle parking provision as part of development proposals that may come forward under other policies. The policy includes the following, which may contribute to mitigation: ■ All new developments must provide high-quality, secure, and accessible cycle parking in line with minimum standards. ■ Car-free and low-car developments will be supported in locations with excellent access to public transport (within 400m of frequent services), good walking and cycling

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			infrastructure, and a range of local amenities within 800m. In such cases, Controlled Parking Zones (CPZs) may be required to manage on-street parking. Adequate provision must still be made for people with limited mobility, operational requirements, and car club spaces. ■ All developments must provide electric vehicle charging infrastructure in accordance with Policy 29 of the Local Transport and Connectivity Plan (LTCP).
DM26 - Windfall Housing	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes This policy sets out the principles that determine where windfall development will be permitted. Although it only sets out principles, it enables the likely location of windfall development to be assessed. Windfall housing, like other residential development will contribute to effects largely relating to population increase, such as recreation pressure, air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM27 - Creating Mixed and Balanced Communities	None	None	No This policy describes the mix of dwelling size/type and the proportion of accessible housing that will be provided but will not itself result in new development (beyond that defined by other policies)
DM28 - Affordable Housing	None	None	No This policy describes the mix of housing tenure that will be provided but will not itself result in new development (beyond that defined by other policies)
DM29 – Specialist Housing for Older People	None	None	No This policy supports and encourages the inclusion of specialist housing for older people (within the overall provision for residential development, which is assessed under the housing policies). It will not lead to new development in itself but will likely lead to considerations for specialist housing within new developments.
DM30 - Custom and Self-Build Housing	None	None	No

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
			This policy requires that at least 5% of dwellings on major sites (100+ homes) be provided as serviced plots for custom and self-build, and will not lead to new development in itself
DM31 - Community-Led Housing	None	None	No This policy sets out principles for community led housing schemes but will not result in new development over and above that set out in other policies.
DM32 - Travelling Communities	Residential development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity Loss of or damage to habitats	Yes The quantum of residential development proposed is not currently specified and likely to be small-scale. However, it may result in a Likely Significant Effect in-combination with other policies resulting in residential/other development. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM33 - Loss, Replacement and Sub-Division of Existing Dwellings	Single building subdivision, extension and changes of use Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Recreation pressure Changes in water quality / quantity	No This policy facilitates and supports the subdivision of existing dwellings into multiple units, and extensions/alterations to existing residential buildings. Single building subdivision, extensions or changes of use could slightly increase the number of people living in a single residence, but not to the extent that there would be likely significant effects.
DM34 - Provision and Protection of Land for Employment	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports employment development in the District within Allocated Sites, Windfall Sites, and Rural and Tier 4 Locations; and therefore has the potential to contribute to effects relating to changes in (working) population (e.g. air pollution). Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM35 - Supporting the Rural Economy	Employment development Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports economic development in rural areas such as small-scale employment sites, farm diversification schemes, and rural enterprise; ; and therefore will contribute to effects largely relating to working population increase, such as air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.

Policy	Likely activities to result as a consequence of the proposal	Likely effect if proposal is implemented	Can likely significant effects be ruled out? (If not, then Appropriate Assessment is required)
DM36 - Learning, Skills and Training	Education infrastructure Changes in vehicle traffic Water abstraction / discharge	Air pollution – dust and vehicle emissions Changes in water quality / quantity Loss of or damage to habitats	Yes This policy supports and facilitates the creation, expansion, or alteration of education infrastructure; and therefore will contribute to effects largely relating to population increase, such as air pollution and water abstraction/treatment. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM37 - Sustainable Tourism	Tourism development Changes in vehicle traffic Water abstraction and discharge	Air pollution – dust and vehicle emissions Recreation pressure. Changes in water quality / quantity Loss of or damage to habitats	Yes This policy provides for tourism development in the District. This has the potential to contribute to effects largely related to overall quantum of development, e.g. air pollution, recreation pressure or changes in water quality / quantity. Depending on the location of new development, there may also be effects related to proximity to a Habitats Site.
DM38 - Digital Connectivity and Home/Co-Working Space	None	None	No This policy is intended to promote the development of new and enhanced digital infrastructure, and will not lead to new development in itself.