

LTP4 Draft Strategic Environmental Assessment

Annex A: Responses to Scoping Consultation

Table 1 provides a summary of the responses received in response to the consultation on the Scoping Report for the Local Transport Plan (LTP4) that was undertaken from 10 April to 16 May 2014. The report was circulated to the statutory consultees (Environment Agency, Natural England and English Heritage) and made available on Oxfordshire County Council's website (www.oxfordshire.gov.uk) to other key stakeholders. The table describes how these comments will be taken into account in the subsequent SEA process.

The 'comment/feedback' column has separate rows which relate to the specific sections of the Scoping Report, its appendices or specific questions (see below) that were posed to consultees in the Scoping Report.

1. Are there any other plans relevant to the LTP that have not been considered in Appendix A?
2. How do you think transport can contribute to improving human health?
3. Are there any priority areas where noise from transport should be addressed in the new LTP?
4. How should the LTP balance objectives to protect and enhance biodiversity in the county, with the need to meet transport requirements?
5. How should the LTP seek to reduce the transport sector's contribution to the use of material resources and waste generation?
6. Are there any other environmental issues in the county that should be considered within the SEA?
7. Have all issues been appropriately scoped?
8. Do you have any comments on the proposed structure of the Environmental Report?
9. Do you have any further comments on the proposed approach and scope of the SEA?

Table 1: Summary of Consultee Responses on Scoping Report

| Consultee | Summary of Comment/feedback | How comment will be addressed |
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| Chilterns Conservation Board | Grateful for the opportunity to comment on the Scoping Report. Welcome the recognition given to the AONBs within the County, particularly in Section 4.12 and in Figure 4.6. The acknowledgement of the importance of the AONBs should be carried through to the LTP4 documents. | No response required. The importance of the AONBs will continue to be reflected in the LTP4 and SEA deliverables. |
| | Welcome the inclusion of the AONB Management Plans within the policies, plans and programmes detailed in Appendix A. Note that the Chilterns AONB Management Plan 2014-19 has recently been adopted. | The recently adopted Chilterns AONB Management will be included in Appendix A. |
| | Noise is dealt with in Section 4.4. It should be noted that a key way of reducing the noise produced by, and therefore the impact of, traffic on local areas is by using low noise surfacing when any highway is maintained or any new highway is constructed. There would be consequent health and well-being benefits. | This comment will be considered during the development of the LTP4. |
| | The Board considers that the SEA Methodology as detailed in Section 5 is appropriately scoped. | No response required. No change to LTP4 process or SEA. |
| | The SEA Objectives are detailed in Section 5.2. The Board considers that Objective 16 should be redrafted to read: 'Conserve [rather than Maintain] and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements'. This would ensure that the objective would more accurately reflect the Countryside and Rights of Way Act 2000 in connection with protected landscapes such as the AONBs within the County. Equally, the sub-objective listed in Table 5.2 for this Objective should also be redrafted to read: 'Conserve [rather than Protect] and enhance landscape character from impacts of transport'. | SEA objective and sub-objective relating to landscape will be reflected in line with all AONB Board's comments to ensure it adequately reflects the CROW Act. |
| | Section 8 is the Glossary. The Board considers that the definition for AONB is not factually correct and would benefit from being redrafted. The Board suggests that something along the following lines might be more appropriate: 'An AONB is an area of high scenic quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape. Natural beauty includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries. AONBs are designated under the provisions of the National Parks and Access to the Countryside Act 1949, in order to secure their permanent protection'. | AONB definition will be updated in the SEA Environmental Report in line with comments. |
| English Heritage (EH) | EH welcomes the opportunity to comment on LTPs and their accompanying SEAs in recognition of the role the historic environment can play in influencing a plan's objectives, the potential direct and indirect impact of a plan's proposals and programmes on historic remains, features, sites, townscapes, and landscapes; and the opportunities for new transport measures to promote and enhance access to and enjoyment of the historic environment. EH statement sent setting out advice on ways to incorporate the historic environment into the LTP. General advice on SA and the historic environment provided in EH's publication "SEA, SA & The Historic Environment". | No response required. No change to LTP4 process or SEA. |
| | Policies, Plans or Programmes: Q1. "International" - "The Convention for the Protection of the Architectural Heritage of Europe" (Granada Convention) & "The Valletta Convention on the Protection of the Archaeological Heritage of Europe". Move the "Ancient Monuments & Archaeological Areas Act 1979" and "Planning (Listed Buildings and Conservation Areas) Act 1990" to "National". | The Policies, Plans and Programmes (PPP) review, which will be re-issued as an appendix to the SEA Environmental Report, will be updated in line with the useful comments received. |
| | Welcome reference to "The Historic Environment: a Force for our Future" and EH advice on SEA, Sustainability Appraisal and The Historic Environment, although as an advisory document, is it appropriate to identify it under "policies, plans or programmes"? Reference could be made to the "National Heritage Protection Plan", produced by EH on behalf of the Historic Environment Forum. | We feel that the PPP review provides an appropriate means to capture the objectives and guidance of other plans, strategies and guidance documents that will inform development of the LTP4 and its SEA. We agree that the EH advice documents (and others) are not strictly PPP, and therefore we have amended the title of the table to include guidance documents too. |
| | Do not understand why only the natural environment aims of the National Planning Policy Framework (NPPF) are identified. Conserving and enhancing the historic environment is an integral part of sustainable development. One of the core planning principles set out in paragraph 17 is to "conserve heritage assets in a manner appropriate to their significance...". | We agree and will update the NPPF text in Appendix A accordingly. |
| | Baseline: Welcome recognition of designated and non-designated heritage assets in the county and reference to the Historic Environment Record (HER). Refer also to the National Heritage List and Heritage at Risk Register. A Historic Landscape Characterisation is currently underway for Oxfordshire and this should be referenced. | Reference will be made to these documents in the SEA Environmental Report. |
| | The likely evolution of the baseline for the historic environment without LTP4 as set out in the box on page 23 is essentially the same as the likely evolution with LTP4, in that the circumstances identified appear unrelated to the policies and proposals in LTP4, with the possible exception of the second point relating to increasing traffic levels (which, if not managed are more likely to impact on the | These comments will be reflected during the production of the SEA Environmental Report. |

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| | <p>significance of historic buildings and streetscapes rather than archaeological sensitivity).</p> <p>Whilst it is helpful to note what circumstances will continue to apply to the historic environment in the absence of LTP4, it would be also be helpful to identify what changes in circumstances would be likely to take place in the absence of LTP4, whether positive (e.g. no new road schemes adversely affecting heritage assets, particularly archaeological assets or remains) or negative (e.g. a lack of management of traffic pressure in historic towns and villages).</p> | |
| | <p>Do not understand why there is a specific consultation question relating to balancing objectives to protect and enhance biodiversity with transport requirements (Q4) but no corresponding question for the historic environment (or landscape).</p> | <p>We agree that equal emphasis should have been given to other important SEA receptors (including heritage and landscape).</p> |
| | <p>Scoping Environmental Issues: Welcome and support the scoping in of the historic environment. However, EH object to scoping out “Other known and unknown features of archaeological and/or historic interest”. Whilst not underestimating the work, it is feasible to consider the effects of LTP4 options on known non-designated features in the same way as the effects on designated assets.</p> <p>The EH advice on LTPs and the historic environment states that ‘It is also important that the historic environment is broadly defined, and potential impacts on non-designated features of local historic interest and value are fully considered since these can make an important contribution to creating a sense of place and local identity.’</p> <p>It should be remembered that not all nationally important archaeological remains are scheduled. Paragraph 139 of the NPPF recognises this, stating that ‘Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage asset.’ It is incorrect to distinguish between designated and non-designated archaeological heritage assets.</p> | <p>Our intention was to not map all individual non-designated sites where they relate to local finds and will not influence decision-making at this plan level.</p> <p>However, we would be happy to include any local, regional or nationally important sites in the assessment that you feel should influence decision-making and we would be grateful if you could provide us with the data and GIS datasets for those sites.</p> <p>The effects of the LTP4 implementation on as yet unidentified heritage resources will be considered further at project level assessment.</p> |
| | <p>Would like to see a stronger link between the baseline and the sustainability issues: what are the implications of the baseline data that give rise to the sustainability issues?</p> | <p>These comments relating to providing a stronger link between the baseline and the sustainability issues will be reflected during the production of the SEA Environmental Report.</p> |
| | <p>SEA Objectives: welcome and support in principle Objective 14, although we would prefer ‘.....the significance of heritage assets.....’. We do not understand why this Objective is subject to the caveat “where possible”, but Objectives 3, 8, 9, 15 and 16 are not.</p> <p>Suggest that the sub-objectives should recognise opportunities for enhancement and include, ‘Enhance access to heritage assets’ and ‘Enhance the historic fabric and character of towns and villages’. These would then need to be reflected in the Assessment Criteria.</p> <p>It is important to recognise the potential benefits (as well as negative effects) of transport measures for the historic environment. This should be reflected in the objectives for LTP4 which, as set out on page 6 of the Scoping Report, fail to recognise the potential benefits of transport management for the natural and historic environment).</p> <p>Suggest including relevant indicators for assessing/monitoring the significant effects of the LTP4 using the Appendix 4 in the EH advice on SEA and the Historic Environment.</p> | <p>We have updated SEA Objective 14 to read <i>Protect and enhance the historic environment, the significance of heritage assets and their settings</i>. We have updated the sub-objectives, as follows: -</p> <ul style="list-style-type: none"> • <i>Avoid or minimise negative effects on cultural assets, the historic environment and local distinctiveness?</i> • <i>Protect and enhance access to areas valued for cultural heritage by sustainable modes?</i> • <i>Enhance the historic fabric and character of towns and villages?</i> <p>The assessment criteria have been updated accordingly. We will also tailor some of the relevant Appendix 4 indicators for us in the SEA.</p> |
| | <p>Appraisal Methodology: suggest that this section also refers to indicators as well as the assessment criteria for the evaluation of the LTP4 measures (see comment above).</p> | <p>The SEA Environmental Plan (e.g. Monitoring Plan etc) will include indicators against which the effects of the plan can be appraised and monitored.</p> |
| | <p>Structure of Environmental Report: No comments on the proposed structure of the Environmental Report, other than it should reflect the comments we have made above.</p> | <p>No response required. EH comments noted and addressed.</p> |
| <p>Environment Agency (letter from Cathy Harrison dated 16/5/14)</p> | <p>Consider that most issues within our remit have been adequately covered.</p> | <p>No response required. No change to LTP4 process or SEA.</p> |
| | <p>Recommend the Flood Risk Section 4.8 is expanded to acknowledge the need to consider flooding from all sources. Currently the focus is flooding from main rivers, however flooding from surface water and ordinary watercourses is likely to be very relevant for any proposed infrastructure. Groundwater, sewer and reservoir flooding may also need to be considered, all these are likely to be more localised. Note that flood risk information has been taken from Lepus, 2014 Green Infrastructure Framework. Recommend flood risk information is also taken from the Local Flood Risk Management Strategy (when published), the Local Authority Strategic Flood Risk Assessments (SFRAs) and Environment Agency web pages.</p> | <p>Although it is not the intention to update the Scoping Report, we will ensure that all comments received are used to inform decision-making and the SEA.</p> <p>The SEA Environmental Report will consider flood risk from all sources. We agree that the emerging Local Flood Risk Management Strategy will provide useful flood risk information to inform our assessment, and the SEA Environmental Report will consider this strategy together with information on Local Authority SFRAs and on the Environment Agency website.</p> |

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| Highways Agency | The HA is an executive agency of the Department for Transport (DfT), responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. Within Oxfordshire this relates to the M40, A34 and A43. Broadly supportive of Oxfordshire's goals and objectives for the LTP4. | No response required. No change to LTP4 process or SEA. |
| | In general, development related traffic originating in and around Oxfordshire will begin to impact on operation of the SRN unless appropriate interventions are implemented. We are continuing to work with Oxfordshire County Council and local planning authorities (LPA) in Oxfordshire to identify how planned growth can be delivered through the spatial planning process. The appropriate mitigation of new development will be identified through the individual development plans produced by LPAs. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. The HA in general, will support a local authority proposal that considers sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. | Noted |
| | The primary responsibility for addressing the Air Quality Management Areas (AQMA) rests with the relevant LPA. Where the SRN is identified as a significant contributor to air quality issues, the HA will work with the relevant LPA to identify how the issue can be improved. | Noted |
| | The way the HA manages traffic noise issues is driven by the Environmental Noise Directive. There have not been any First Priority Locations identified through the first round of noise mapping adjacent to the SRN in Oxfordshire, however, a number of Important Areas were identified. I have included these with this response (PSA). A second round of noise mapping has recently been carried out by DEFRA and will take account of those locations that since 2008, changes to traffic levels might have increased traffic noise to necessitate further investigation. We are anticipating receiving this information in the next few weeks. | We will consider the Environmental Noise Directive areas during the development of the SEA. |
| | Reference to the Department for Transport Circular 2/2013 (The Strategic Road Network and the Delivery of Sustainable Development) for information. | The Transport Circular will be used to inform the SEA of the LTP4 and development of the overall plan. |
| | Last year, the Government announced details of its spending plans for transport infrastructure up to 2020-21. This included long term funding for the SRN and we are currently working with local stakeholders on the new Route Strategies which will inform future investment decisions. Through this process, any significant schemes to facilitate committed planned economic growth will be considered. | Noted |
| Natural England (NE) (letter from Charles Routh dated 8/5/14) | Q1: Are there any other plans relevant to the LTP4 that have not been considered in Appendix A? The North Wessex Downs AONB Management Plan 2009 - 2014 is likely to have been updated soon if not already. We are also aware that there are a number of emerging local plans which are likely to have significant implications to this plan (especially with respect to housing numbers/allocations). | The 2014 – 2019 AONB Management Plan is not currently available although consultation on it ended in October 2013. We will monitor the status of this document during the development of the LTP4. We will consider the emerging plans during the development of the LTP4. |
| | Q2: How do you think transport can contribute to improving human health? Transport affects human health, as follows (in relation to the natural environment): Air quality (both a human and biodiversity health issue), road side tree cover (reducing driver stress, intercepting noise and air pollution, lower traffic speeds and greater attractiveness leading to greater cycling and walking) and rights of way (improved condition and extent, leading to increased active lifestyles). | NE's comments will be used to inform development of the LTP4. |
| | Q3: Are there priority areas where noise from transport should be addressed in the new LTP? NE have insufficient local knowledge to respond. Suggest that the local AONBs may be well placed to answer this question. | The AONB Offices will have an opportunity to comment on the SEA. |
| | Q4: How should the LTP balance objectives to protect and enhance biodiversity in the county, with the need to meet transport requirements? The LTP4 should identify the threats/opportunities that the plan presents to biodiversity, and seek to minimise the former and maximise the latter. The principle ones we see are: 1. Impacts on Oxford Meadows SAC due to changes in air quality resulting from changing traffic flows and volumes. 2. Direct impacts on biodiversity features due to infrastructure improvements. 3. Opportunities for biodiversity enhancement from land use change within the highway estate (e.g. roadside tree planting, different mowing regimes, management to ensure pollutants in run-off from roads are intercepted or otherwise reduced). In addition to meeting the policies relating to biodiversity set out in the NPPF, we advise that the LTP should help to deliver the | We agree with the comments and will ensure that these are appropriately reflected in the development of the LTP4 and its SEA. We will seek opportunities for the LTP4 to contribute to Biodiversity 2020 and will ensure consideration of the Natural Environment White Paper (already highlighted in our PPP Review in Appendix A of the Scoping Report) and the useful Local Transport Briefing. |

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| | <p>Biodiversity 2020 strategy. The ideal is to be looking for win wins, rather than trading biodiversity gains or losses against other transport deliverables, and to aim for strategic biodiversity net gains.</p> <p>Draw your attention to the Natural Environment White Paper commitment 32: “The Government will work with its transport agencies and key delivery partners to contribute to the creation of coherent and resilient ecological networks, supported, where appropriate, by organisation-specific Biodiversity Action Plans.” Also attach “Local Transport Briefing for Local Nature Partnerships (September 2013)” produced by Natural England, which may provide useful information (attached).</p> | |
| | <p>Q6: Are there any other environmental issues in the county that should be considered within the SEA?</p> <p>We advise that while landscape has been considered, of particular interest to Natural England is how the LTP4 can mitigate any cumulative impacts on designated landscapes due to increases in rural traffic resulting from allocated housing in local plans.</p> | <p>We agree with the comment and will ensure that these are appropriately reflected in the development of the LTP4 and its SEA.</p> |
| | <p>Q7: Have all issues been appropriately scoped?</p> <p>Natural England is satisfied with the scoping of the issues relating to the natural environment.</p> | <p>No response required. No change to LTP4 process or SEA.</p> |
| | <p>Q8: Do you have any comments on the proposed structure of the Environmental Report?</p> <p>The implication is that the SEA will assess the LTP4 as a whole and compare it to alternatives. We advise that the SEA assesses individual policies and their alternatives instead.</p> | <p>We agree with the comment, which is our proposed approach to assessment. We will ensure that the wording in the SEA Environmental Report (notably the assessment criteria) reflects this.</p> |
| | <p>Q9: Do you have any further comments on the proposed approach and scope of the SEA?</p> <p>Table 5.1. We are not clear what is meant by “Potential impacts on species, and habitats not likely to be found in or adjacent to the study area.” It would be helpful if this was clarified.</p> | <p>The Strategy will not consider species and habitats not likely to be found in or adjacent to the study area, for example, marine/ intertidal habitats or species etc.</p> |
| | <p>We note that “The SEA will address impacts of the strategic options on the WHS, AONB, green belt and Areas of High Landscape Value, as appropriate. The Landscape Character Assessment (OWLS) will help to guide and influence the choice of options.” It is likely that impacts on designated landscapes are may arise from projected housing growth due for the reasons set out in the Landscape: Likely evolution of the baseline without LTP4 section. We advise that as well as direct impacts from strategic infrastructure the SEA should consider how the proposals in the LTP4 are likely to influence: increasing traffic volumes will increase noise disturbance in the countryside and the loss of tranquillity, increases in traffic will cause more vehicles to use unsuitable rural roads, changes to the landscape due to de-cluttering of rural roads and management of the highways estate. We thus advise this table is modified to reflect these comments.</p> | <p>These comments will be reflected in the revised scoping table during the production of the SEA Environmental Report.</p> |
| | <p>Table 5.2 As a general point, we take it that the assessment criteria are to be used to assess policies in the LTP4, and as such the assessment criteria should read “Does the LTP4 policy support...”</p> <p>Regarding landscape, the table only considers two ways polices in the Plan can impact landscape; direct infrastructure or lighting impacts. There are other ways polices can impact on landscape. The management of the highway estate can have positive or negative impacts on the landscape objective. This embraces both any “de-cluttering” activities, vegetation planting and management, and litter management. Polices can also influence traffic levels on unsuitable rural roads, leading to a loss of tranquillity, which should be considered as a landscape impact.</p> | <p>Yes – Table 5.2 will be updated accordingly.</p> |
| <p>North Wessex Downs AONB</p> | <p>Landscape: Likely evolution of the baseline without LTP4</p> <p>It is likely that increasing urbanisation will increase pressure on the skyline and viewpoints around Oxfordshire. There is potential for development pressure to detract from the quality of some of the county’s landscapes. Light pollution from development will continue. Increasing traffic volumes will increase noise disturbance in the countryside and the loss of tranquility. Increases in traffic will cause more vehicles to use unsuitable rural roads. However, plans to de-clutter streets and improvements to the public realm will improve the townscape in some areas.</p> | <p>These issues will be incorporated within the SEA Environmental Report.</p> |
| | <p>Q6: Are there any other environmental issues in the county that should be considered within the SEA?</p> <p>We are already aware of a number of significant proposed infrastructure, housing and employment proposals within the North Wessex Downs AONB. These include for example:</p> <p>The Chilton interchange on the A34.</p> <p>Proposed housing site East of Harwell Campus 1400 dwellings (with a reserve site for 2000 additional dwellings) – see attached objection to the Vale of White Horse Local Plan.</p> | <p>Consideration will be given to the direct impact from proposed infrastructure, housing and employment proposals on the landscape within the AONB within the SEA Environmental Report.</p> |

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| | <p>New substantial employment buildings within the Harwell Campus.</p> <p>There is also the risk of further cumulative harm specifically from strategic housing sites outside but within the setting of the North Wessex Downs AONB around Harwell Village, Didcot and Wantage.</p> <p>We would therefore like consideration given within the SEA of the significant risk of direct impact from development within and adjacent to this AONB. Impacts will not be distant in terms of “skyline and viewpoints” but there could be substantial loss of large areas of open countryside intrinsic to a nationally protected landscape and its setting. Therefore the impacts on the AONB could be direct, substantial and highly negative.</p> | |
| | <p>Our own LVIA of the proposed East of Harwell Campus housing site 1400 dwellings (plus an additional 2000) concludes by stating: <i>“The highest level of protection is fundamental, and the sacrificing of an important and distinctive protected landscape for development is not acceptable when it is clear that there are large areas of the District outside the sensitive locations of the AONB. The justification given for this site is very tenuous and contains little detail. Bearing in mind paragraph 15 of NPPF, and the Significant Negative impacts, any justification for overturning national guidance, and the wholesale degradation of a nationally designated landscape, has got to be extremely strong and a truly exceptional circumstance. There is no evidence to suggest that this is the case.”</i></p> | This is noted. |
| | <p>Conclusions</p> <p>In conclusion we recommend that the SEA includes specific reference to the potential for direct impacts on our nationally designated AONBs including loss of intrinsic countryside, loss of agricultural land, loss of natural space (including space to accommodate nature, store and provide water and meet our needs in terms of food and provide open spaces for recreation). This is in addition to the impacts already highlighted from noise, lighting, viewpoints and pollution.</p> <p>Under the section 5.2 SEA Objectives it should also be noted that the Council is under a legal obligation to consider the conservation and enhancement of the nationally protected AONBs (Section 85 of the CRoW Act 2000). It is therefore recommended that reference to this is added to the objectives. For EIA purposes AONBs are also listed as “sensitive areas.”</p> <p>Our specific transport related concern in respect of the East of Harwell Campus proposed housing allocation is that a new greenfield housing development of potentially 3400 houses which relates to no existing settlement and is separated from the adjacent employment site by a main road, is only going to increase car reliance. The Vale of White Horse has ignored the conclusions of their own SA/SEA in considering this site as being suitable (again see attached). We therefore hope Oxfordshire Council will take a more supportive role in consideration of our attached objections to the Vale’s proposals.</p> <p>In terms of our documents we recommend including reference to our three Position Statements (Housing, Setting and Renewable Energy 2012) and we note that our Management Plan has already been referred to.</p> | Comments noted for consideration during the SEA. We will reflect comments in the landscape section of the Environmental Report, re-word the SEA landscape objective and reference the relevant Position Statements. |

