Annex 3: Oxfordshire Plan 2050: Sustainability Appraisal Scoping Report consultation: Draft response from Oxfordshire County Council

Reference	Comment	Proposed Change
Para 2.2	Public Health is not included within the listed examples of Oxon CC functions. As the Public Health function were transferred over 6 years ago rom the NHS relatively recently and 'healthy place shaping' is a key Growth Board objective including 'Public Health' at this point would clarify where this function sits and help set the narrative framework for subsequent sections.	Add 'Public Health' to examples of Oxon CC functions.
Para 2.3	Should this list include reference to natural capital, including a footnote explaining what this is, as natural capital is specifically mentioned in the briefing documents for the Oxfordshire Plan 2050?	Consider inclusion
Para 2.4	Under the heading "Relationship with other relevant plans and programmes" no reference is made to Oxfordshire's emerging Joint Health and Wellbeing Strategy (1) the draft of which was recently approved for engagement by Oxfordshire's Health and Wellbeing Board (due to be finalised March 2019). Priorities for taking a healthy place shaping approach (to help prevent ill health, reduce the need for treatment and delay the need for care), and tackle critical workforce shortages are headline sustainability issues that are particularly relevant to the Oxfordshire Plan. The Health and Wellbeing Board is a partnership between local government, the NHS and the	Add a new paragraph entitled 'Oxfordshire's Joint Health and Wellbeing Strategy' with the following text: In November 2018 the Oxfordshire Growth Board endorsed the Oxfordshire Director of Public Health's proposals for 'healthy place shaping' to be integrated within all Oxfordshire Housing and Growth Deal strategies and workstreams. This supports the Oxfordshire's Health and Wellbeing Board's overarching 'Joint Health and Wellbeing Strategy' which includes 'healthy place shaping' as a headline priority. This strategy with 'healthy place shaping' at its core aims to help prevent avoidable ill health, reduce

	people of Oxfordshire. It includes local GPs, County and district councillors, Healthwatch Oxfordshire, and senior local government officers from the County and districts. This strategy forms the policy framework that the Director of Public Health used to seek and gain endorsement for healthy place shaping to be included within all Oxfordshire Housing and Growth Deal Strategies and workstreams.	the need for treatment and delay the need for care, whilst also supporting 'new models of care' and tackling critical workforce shortages. Cutting across all these issues is the need to reduce health inequalities. The Health and Wellbeing Board is a partnership between local government, the NHS and the people of Oxfordshire. It includes local GPs, County and district Councillors, Healthwatch Oxfordshire, and senior local government officers from the County and districts.
Para 2.7	'*The assumption built in to this figure was that 1,400 dwellings per annum were required in Oxford to 2031*.' It's unclear in the context of this paragraph why there is this specific reference. Is it to provide an example? Or to make reference to Oxford's unmet need? Or would quoting the target dwellings per annum for Oxfordshire be more relevant?	This sentence either needs additional clarification or, if not relevant, removed
Para 2.10	'*The LTP4 includes an area strategy for Oxford as well as other strategies, including a bus strategy which sets out how improvements will be made to the county-wide bus network as well as developing rapid transit services along the busiest routes*.' This requires expanding as suggested.	The LTP includes area strategies for the growth areas of Oxford, Banbury, Bicester, Carterton, Witney and the Science Vale – including Didcot, Wantage/Grove & Abingdon. It also includes overarching strategies covering sustainable transport modes, such as bus, rail, walking and cycling strategies.
Para 2.11	'*Regionally and county-wide, the strategy supports an East-West rail link between Oxford, Bicester, Milton Keynes and Bedford; rail improvements between Oxford and Didcot; redevelopment of Oxford Station, and upgrades to the A34.* *In the long term, it [OxIS] also supports an Oxford-*	The language in this paragraph is misleading. OxIS <u>identifies</u> schemes proposed by Infrastructure providers – including local and national providers. OxIS comments that the **National Infrastructure Commission** recommends and supports and Oxford-Cambridge expressway but OxIS

	Cambridge expressway, which will provide a new high-quality road link between Oxford, Milton Keynes and Cambridge. ' OxIS report makes reference that **The National Infrastructure Commission (NIC) report 'Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc'** identifies that the economic success of the corridor is threatened by a lack of housing and poor east-west connectivity and proposes that plans for East West Rail and the Oxford-Cambridge Expressway will support the corridor's long-term prosperity and growth. The OxIS report does not provide recommendations but instead provides commentary that the 'government has committed to delivering an Expressway which will run between Oxford and Cambridge'	doesn't provide recommendations. The text in section 2.11 is a commentary on NIC's report 'Partnering for Prosperity…' not OxIS. Please therefore change this heading. Replacement text for OxIS can be taken from the Oxfordshire Growth Board website: 'The Oxfordshire Infrastructure Strategy (OxIS) is an Oxfordshire Growth Board commissioned project involving all six Oxfordshire Local Authorities. Its purpose is to identify, map and prioritise Oxfordshire's infrastructure requirements to 2040 and beyond. The Strategy is informed by a variety of strategic documents including council Local Plans. Statutory organisations, infrastructure and service providers, including Health, Emergency Services, Utility and Green Infrastructure providers, also provided input into its development.'	
Table 2.2	The '*population health and wellbeing'* section includes priority issues, such as an ageing population and the need to tackle health inequalities but omits or is too narrow in its definition of other key sustainability challenges. Critically, the increasing gap between years lived without disability and/or long-term conditions and overall life expectancy has not been stated. This will have profound implications for the nature of the built environment and the numbers of people who are likely to need varying levels of health and social care support.	Add/amend the following 'Sustainable Development Messages/Objectives': • Take into account the needs of an ageing population *where the number of people living with long term conditions and disability is likely to significantly increase.* • Take into account the needs of less able people *and more vulnerable groups such as children.* • Improve peoples' health *to reduce the gap between*	

	Similarly, although most comparative indicators show Oxfordshire is better than the England average, current lifestyles will still result in unsustainable demand for health and care services amongst the whole population - not just older people. For instance, the number of obese primary school children more than doubles between Reception Year and Year 6 meaning the rates of complex conditions associated with diseases, such as diabetes, are increasing. This section makes no mention of the need to cater for new models of care which aim to support greater population health management/maintain independence for as long as possible.	*healthy life expectancy and overall life expectancy* and reduce health inequalities • Improve active lifestyles *to help address a range of key public health priorities including mental health and wellbeing, obesity, cardiovascular disease, diabetes and dementia*. • *Support new models of care that seek to reduce the need for treatment and delay the need for care.* • *Make it easier for people to make healthier food choices*
Table 2.2	The focus has been placed on environmental air quality limits rather than reducing cumulative exposure of individuals and particularly vulnerable groups, such as children and those with respiratory conditions.	Add/amend the following 'Sustainable Development Messages/Objectives': Place particular focus for air quality improvements on those locations where air quality standards are not being met *and where vulnerable groups are most likely to be exposed to air pollution e.g. children outside schools*.
Paragraph 3.3	This paragraph states: "*Some topics that are covered in the baseline information in the above reports are not addressed in the baseline information in this chapter because the location of development will not affect these issues, and therefore they are not relevant to the assessment framework for the Oxfordshire Plan 2050. This is the case for topics such as <u>waste</u> and crime.*" It is not agreed that waste is a topic that will not be	A section on the topic of Waste should be added, to address the safeguarding of waste management sites as required by policy W11 of the Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy.

	affected by the location of development. In the Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy, policy W11 safeguards sites for waste management use. The sites to be safeguarded will be identified in Part 2 of the Plan, the Site Allocations Plan, but Appendix 2 of the Core Strategy lists sites that are safeguarded in the meantime.	
Para 3.7	This para does not reflect the diffuse nature of rural poverty that also exists in the county. This could also tie in with para 3.17	…Oxfordshire's rural areas are generally prosperous, …" This however masks pockets of disadvantage which tend to be overlooked.
Para 3.11	The needs of an ageing population are rightly highlighted, but no reference is made to the increasing number of people of all ages living with chronic conditions and disability.	Add/amend the following: Britain has an ageing population *and the number of people living with long term conditions and disability is increasing* which has significant implications for the economy and public service provision.
Para 3.14	The needs of an ageing population are rightly highlighted but again no reference is made to the increasing number of people of all ages living with chronic conditions and disability.	Add/amend the following: An ageing population is also a key factor affecting a reduction in household size, with more homes being occupied by fewer people in the future. *Increasing numbers of people living with long term conditions and disability will require improved accessibility standards in homes and the wider public realm to enable people to move around independently.*
Para 3.21	Focus on overall life expectancy when demand for services and need for accessible infrastructure will be largely determined by healthy life expectancy i.e. the length of time	Delete: Oxfordshire tends to be relatively healthy compared with other parts of the country Replace with: *Life expectancy in Oxfordshire is above*

	people can expect to live without any chronic conditions or disability.	*the England average but significant challenges are faced by the increasing number of people living with chronic conditions and disability.*
Para 3.22	Focus on health inequalities when issues such as mental health and wellbeing, and obesity negatively affect the whole population.	Add/amend the following: Overall, common conditions include high blood pressure, diabetes, asthma, and common mental health disorders like depression and anxiety. *Although the prevalence of such conditions is generally worse in areas of deprivation, these issues affect the whole population. For instance, despite being below the England average obesity rates in primary school children more than double between Reception Year and Year 6 which is unsustainable. In a minority of cases health outcomes for the whole population are worse than the England average e.g. incidence of self-harm.*
Para 3.23 and Table 3.3	Although above the England average the trend, unlike obesity and mental health etc., is downwards. The evidence suggest that the primary cause of accidents is driver behaviour i.e. speeding. If transport colleagues agree that this should be included as a headline sustainability issue for Oxfordshire it should be included in Table 3.9: Key sustainability issues for Oxfordshire and likely evolution without the Oxfordshire Plan 2050 (Transport) not Table 3.3	Remove/relocate paragraph 3.23 and reference in Table 3.3
Table 3.3	The increasing gap between years lived without disability and/or long-term conditions and overall life expectancy has not been highlighted as a key sustainability issue. Similarly,	Add/amend in line with comments for Table 2.2 above. The ageing population priority could be widened to also

	the need to support new models of care which aim to support greater population health management/maintain independence for longer are not mentioned.	include the increasing numbers of people living with long term conditions and disability. Similarly, the health inequalities priority could be widened to including the need to reduce the gap between healthy life expectancy and overall life expectancy. An additional priority is required for new models of care.
Table 3.6	This has a disproportionate impact on lower paid workers, such as carers who will be in increased demand.	Highlight that affordable housing is critical to sustain the health and social case workforce for which there will be a growing demand
Para 3.35	The LES also notes the relevance of Oxfordshire's high quality natural environment as a factor that underpins the county's economic success.	Include reference to the county's high-quality natural environment as a success factor
Para 3.46	This paragraph paints an inaccurate picture of Oxfordshire's bus network – changes required as suggested	Oxfordshire has a mature and well-used network of largely commercial bus services, including regular services to the city centre from the five Park and Ride sites on the edge of the city. Oxfordshire has the highest bus usage per head of population of any English shire county. Most of the county's main towns are connected to Oxford by high frequency bus services, with lower frequency but nevertheless commercial services connecting smaller towns and larger villages to the city. A limited number of 'secondary' bus services operate with varying frequencies on routes away from the main transport corridors but many of the less well used services have been withdrawn in recent years following the removal of financial support for such bus services.

Para 3.49	First sentence states most of the outward commuting is to Reading – is this from the whole of County? Third sentence – is this related to South Oxfordshire. Paragraph is not clear in relating the statistics back to the geographical area.	
Table 3.9 – Row 1 (Private car use)	The Oxfordshire LTP aims to minimise private travel through the use of public transport, walking and cycling *and achieving this is also dependent on policies and allocations within Local Plans*	The Oxfordshire Plan 2050 provides an opportunity to **contribute towards reducing** car use through the promotion of a joined-up approach to **strategic planning and transport planning**
Table 3.9 - row 2 (Traffic congestion)	The focus of the second priority concerning traffic congestion in Oxford focuses on a "*lack of alternative routes for journeys both within and through the county*". The problem is also due to a lack of or poor-quality modal alternatives.	Add/amend the following: This is due to the lack of alternative routes *and good quality modal alternatives* for journeys both within and through the county. The corresponding likely evolution paragraph should at least mention encouraging active travel for short journeys and last mile stages.
Table 3.9 – Row 3 (Rail)	'Without the Oxfordshire Plan 2050, there will be a continued need for improvements to be made to rail services across Oxfordshire.' It is not clear what is meant by improvements to rail services – is it trying to infer upgrades to rail infrastructure and new stations or to the services themselves (e.g. frequency). Developing the rail network is one strategy of many to support the reduction in private car travel and is the remit of the LTP. The role of the Oxfordshire Plan 2050 is promote joined up-approach to strategic planning and transport	The Oxfordshire Plan 2050 provides an opportunity to **identify regions of growth** in relation to the rail and highway network and promote a joined-up approach to strategic planning and transport planning **at a local and national scale.** The Oxfordshire Plan 2050 can help integrate development of new public transport initiatives and encourage collaborative working between each of the six Oxfordshire Councils, **Network Rail, Train Operating Companies, and Highways England**

	planning	
Table 3.9 – Row 4 (Bus)	Bus networks across Oxfordshire struggle due to the rural nature of the county, the absence of any subsidies meaning that services are required to be commercially viable, and compounded by a historic reliance on the car whereby people perceive the bus service to be inadequate or not meeting their needs or new development is built in locations where bus services do not exist	Remove 'Without the Oxfordshire Plan 2050, bus networks across Oxfordshire are likely to remain under-developed' as this is inaccurate . Keep this phrase: 'The Oxfordshire Bus & Rapid Transit Strategy (part of the Oxfordshire Local Transport Plan 2015) aims to improve bus services across Oxfordshire so as to reduce dependence on the private car. Include: "The Oxfordshire Plan 2050 could help support improvements to the bus network through the promotion of collaborative working between the six Oxfordshire Councils, and by ensuring that new strategic scale development links into and supports the bus network. Oxfordshire has an excellent network of commercial bus services but there are gaps in the network which well-planned development could help address. Development planning needs to align better with the existing strong public transport corridors"
Table 3.9 – Row 5 (Walking and Cycling)	'Without the Oxfordshire Plan 2050, it is anticipated that the standard of cycling and walking networks across Oxfordshire would remain as they are.' – The Oxfordshire Plan 2050 has a role to promote sustainable travel and propose growth where it is more conducive for healthy and sustainable travel to take place but the standard of cycling and walking networks will be mostly influence by the emerging Local Cycling and Walking Infrastructure Plans	Remove 'Without the Oxfordshire Plan 2050, it is anticipated that the standard of cycling and walking networks across Oxfordshire would remain as they are.' Keep this phase and add items in bold 'The Active & Healthy Travel Strategy (part of the Oxfordshire Local Transport Plan 2015) seeks to reduce pressure on the road network through the promotion of

	(LCWIPs) and investment from the Cycling and Walking Investment Strategy (CWIS)	sustainable door to door journeys that combine cycling or walking with public transport. LCWIPs are also starting to be developed that will propose where improvements on the network would provide a safer more attractive environment for cyclists and walkers. The Oxfordshire Plan 2050 could help support improvements to the pedestrian and cycling infrastructure through supporting the recommendations in the LCWIPS and promoting collaborative working between the six Oxfordshire Councils, ensuring that new strategic scale development links into and supports cycling and walking networks.
Table 3.14	A key opportunity for the Oxfordshire Plan 2050 would seem to be ensuring that the scale and nature of investment in water treatment works matches predicted development – emphasise this rather than 'it can also'. SuDS is likely to be only a small part of the solution and is better at dealing with water run-off rather than pollution amelioration.	The Oxfordshire Plan 2050 offers the opportunity to ensure that development does not lead to polluted run-off, for example by considering the nature and investment required in waste-water treatment in a co-ordinated way across each catchment and through Sustainable Drainage Systems (SuDS).
Para 3.62	Check that the names of the catchment's referred to are up to date.	See https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6 to check catchment names
Para 3.65	It would be helpful to have actual numbers for water bodies in South and West Oxfordshire if these could be found.	Requires further research by consultants
Para 3.67	Development should not increase run-off rates above existing 'greenfield' rates. Incremental development may however lead to increased run-off rates even where this is not itself in a high flood risk area. See also Table 3.15	Consultants to review whether "Development within high flood risk areas, or the loss of greenfield land to development, could contribute to increased flood risk." is an accurate description of position.
Para 3.75	Expand on the difference between 3a and 3b, as 3a gets into the BMV category. Is there anything that can be said	Refine district descriptions based upon a finer

	about opportunities to enhance soil quality?	differentiation of ALC.
Para 3.76	The included Figure shows distribution of all ALC classes not just high quality.	Figure 3.5 shows the variation in agricultural land quality across Oxfordshire.
Para 3.79	Clarification of different types of sand and gravel is required; and the soft sand resources in the Oxford to Faringdon and Duns Tew areas should be specifically mentioned.	Split and amend the first sentence: "Sand and gravel is the most common mineral resource across Oxfordshire. Sharp sand and gravel is ~~and~~ typically found in river valley deposits, particularly along the River Thames which runs north-south through the District and its tributaries." Add new sentence after first sentence: "Soft sand is found in the Corallian Ridge area between Oxford and Faringdon and in the Duns Tew area in the north of the county."
Para 3.80	The figures in the second sentence should be updated to 2017.	Amend second sentence to read: "It increased again, to just under two million tonnes in 2015 and continued at around that level to 2017, comprising 52% sand and gravel and 48% crushed rock." Update source at footnote 50 to: "Oxfordshire County Council (2018) Oxfordshire Local Aggregate Assessment 2018"
Paragraph 3.81	Update required	Delete the word 'last' in the second sentence.

		Add new sentence at end of paragraph: "Production capacity in 2018 was split 58% in northern Oxfordshire and 42% in southern Oxfordshire. (Source: Oxfordshire County Council (2018) Oxfordshire Minerals & Waste Annual Monitoring Report 2017."
Paragraph 3.83	Clarification required	In the first sentence, delete "this plan" and insert "the Oxfordshire Minerals and Waste Local Plan (1996)".; and delete "consulted" and insert "prepared, with a target for adoption by the end of 2020". Amend the second sentence to read: "Core Strategy Policy M3 has identified the following strategic resource areas as principal locations for aggregate mineral extraction and these areas are safeguarded under policy M8 safeguarding working aggregate minerals
Table 3.17	The first sentence in the second column seems to be incorrect in referring to "un-planned minerals development"; and it is unclear what is meant by in referring to "areas being overused". The third sentence in the second column seems to be incorrect in referring to "mineral development". Also, it should refer to the District Councils working with the County Council, as well as with each other, to ensure that minerals issues are taken into account.	Amend the first sentence in the second column to read: Without the Oxfordshire Plan 2050, un-planned minerals development could take place in areas being overused and result in unnecessary sterilization of important mineral resources, although each of the District's Local Plans should guard against this happening. Amend the third sentence in the second column to read: "The Oxfordshire Plan 2050 could provide an opportunity for each of the District Councils to work together to ensure that minerals development is located

		and designed to take into account the importance of ~~ensuring~~ <u>safeguarding important mineral resources to ensure that</u> sufficient economic minerals are available for future generations to use.
3.87	There is a strong case to add in other important direct and indirect impacts notably increased recreational pressure on important habitats, increased fragmentation in addition to direct habitat loss.	The impacts of development on biodiversity and geodiversity could include direct <u>loss</u> or physical damage and a loss of habitat connectivity, disturbance and the impacts of non-physical disturbance such as noise, vibration or light pollution.
Table 3.18	These figures need to be checked.	Check all figures
Fig 3.7	This should include Conservation Target Areas	Include CTAs
3.90	These figures need to be checked with TVERC to ensure that they are up to date. The 2014 reference is now out of date. A more up-to-date reference would be the *Oxfordshire State of Nature 2017* report which should be the first point of reference for this chapter.	Check figures against most up-to-date sources
3.90	Reference should be made to the Oxfordshire's Conservation Target Areas. These are the strategic areas identified for biodiversity enhancement. As such they would be a core part of what the NPPF requires when it refers to plans to consider "establishing coherent ecological networks". Further details can be found at https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/	Include reference to CTAs
	There is no reference to ancient woodland or veteran trees, or even woodland generally. As irreplaceable habitats – and Oxfordshire is likely of international importance for its	Include reference to irreplaceable habitats including data where available. Include reference to freshwater

	veteran trees - they are specifically mentioned in the NPPF. Other irreplaceable habitats such as unimproved grasslands should also be referenced. The lack of mention of ponds and watercourses is also noted. Overall the strong focus of this section on the designated sites does not provide an accurate background to the biodiversity sustainability issues that the plan will need to address.	habitats.
	The headline statement "Less than 10,000ha of Oxfordshire retains any special value for wildlife which equates to 4% of the total landmass of the County" gives a misleading impression of biodiversity in the county. It implies that the remaining 96% is of little interest. It takes no account of the importance of habitat connectivity nor, for example, the area of land required to maintain viable populations of species of principal importance.	Reconsider phrasing.
Table 3.19	Key sustainability Issues: Much of the county's biodiversity value is outside the designated sites and the importance of these are underplayed. The importance of connectivity / fragmentation should be highlighted as a key issue. Perhaps the biggest sustainability issue for the county is that biodiversity has been and with the exception of a few examples, continues to be in decline. Reference should be made to the *State of Nature 2017* report for a more comprehensive picture of the key issues faced. A further key issue not mentioned is the lack of appropriate management which is also an issue for geological sites.	Review wording in table.
Table 3.19	The sentence "Although the vast majority of the designated sites are in favorable or unfavorable recovering condition, this needs to be maintained" implies that 'unfavorable recovering' condition is an acceptable end-point. The target	Although the vast majority of the designated sites are in favorable or unfavorable recovering condition, the ultimate target should be favorable condition.

	should be favorable condition for all.	
Table 3.19	Under 'Likely Evolution without the OXFORDSHIRE PLAN 2050'. The protection given to locally identified sites (they are not designated in the formal sense) through local plans is typically less than for designated sites. Without the Oxfordshire Plan 2050 one can expect that pressure on such sites will be increased and the biodiversity fabric of the county further eroded.	Review wording.
Para 3.92	Oxfordshire has significant heritage assets covering the entire County. These assets are not mainly concentrated in Oxford City as can clearly be seen on the tables below. For example, Oxford has 1172 listed buildings in total against the 10985 within the County. The City also has 10 scheduled monuments whereas the County as a whole has 301.	Oxfordshire has significant historic environment assets covering the entire County.
Para 3.93/4	These sections list the heritage assets for Oxford City but only give a cursory view of the County as a whole. Oxford District should only be listed separately if the same is going to be done for the other 4 Districts otherwise it gives a misleading impression of the status of Oxfords historic environment.	The same level of detail should be added for the other 4 Districts.
Para 3.93/4	This section should also include reference to the majority of heritage assets in the County as a whole which are not designated.	
Para 3.98	Include reference to the setting of the AONBs. Reference could usefully be made to the management plans for each	The landscape value of the AONBs extends beyond the boundary to include their setting. Other issues such as

	AONB. There are wider issues that will have an impact on the AONB including lighting, tranquility, increase in visitor pressure etc.	lighting, increased visitor pressure and loss of tranquility might also affect the qualities of the AONBs.
Para 3.100	In relation to Oxford, reference could be made to the view cones which are shown on the accompanying plan.	Add, View cones have been defined to identify the key viewpoints into the city from surrounding areas.
Para 3.109	Reference should be made to the Oxfordshire Wildlife and Landscape Study (OWLS) which provides the main county-wide assessment of landscape character and identifies forces for change. This is likely to be of more relevance than the national character areas. Landscape character assessments have also been made at district level.	The Oxfordshire wildlife and Landscape Study provides an Oxfordshire specific county-wide description of landscape character. District-level landscape character assessments provide further, more detailed information.
Para 4.8	Is it appropriate to consider the impact of climate change on transport infrastructure – road / rail etc	Consultants to consider
Para 4.23	The summary of key sustainability issues that the Oxfordshire Plan 2050 will need to address needs to revised in line with comments made concerning Chapters 2 and 3.	The following statement must also mention the lack of or poor quality of existing active travel infrastructure: "Significant road congestion, particularly on strategic roads and routes into the County's main settlements at peak hours, coupled with inadequate public transport services outside the main settlements"
Para 4.23	Biodiversity bullet point – include the need to enhance as well as protect the county's biodiversity – not necessarily the same as strengthen ecological networks	The need to protect and enhance the County's **biodiversity**, in particular its internationally and nationally designated habitats, but also to maintain and strengthen its ecological networks both within the County but also beyond.
Para 4.23	Landscape bullet point – three AONBs not two.	… the protected landscape of the three AONBs and

		their setting.
SA Table 13	Clarify that locally important sites are 'identified' not just designated, as this can be misleading for people not familiar with the distinction. E.g. LWS are identified, LNRs are designated.	Safeguard Oxfordshire's locally designated and identified biodiversity assets, taking into account the impacts of climate change?
Page 79	The CROW Act (2000) and the duty of regard it contains for local authorities in respect of AONBs	Include reference to the CROW Act (2000).
Table 5.1	Appraisal questions should be revised in line with comments regarding Chapters 2, 3 and 4.	Add/amend SA objective 8: Minimise increases in polluting traffic in Oxfordshire's Air Quality Management Areas *and reduce cumulative exposure to more vulnerable groups such as children*? Facilitate the take up of low / zero emission vehicles *including e-bikes and active modes*?
Table 5.1	Appraisal questions should be revised in line with comments regarding Chapters 2, 3 and 4.	Add/amend SA objective 1: The ageing population question should be widened to also include the increasing numbers of people living with long term conditions and disability. Alternatively, the need to cater for increasing numbers of people living with long term conditions and disability could be included as a standalone question. Add/amend SA objective 2: The health inequalities question should be widened to ask whether the Oxfordshire Plan 2050 contributes to reducing the gap between healthy life expectancy and

		overall life expectancy. Alternatively, whether the Oxfordshire Plan 2050 contributes to reducing the gap between healthy life expectancy and overall life expectancy could be included as a standalone question.
		An additional question is required to ask whether the Oxfordshire Plan 2050 takes account of and support new models of care that seek to reduce the need for treatment and delay the need for care.
		An additional question is required to ask whether the Plan makes it easier for people to make healthier food choices.
		Add/amend SA objective 3:
		Encourage social interaction (that might not have otherwise occurred) and facilitate the integration of new communities with existing communities?
Table 5.1 – SA objective 2	Add additional target:	- To address the health impacts of development and regeneration proposals: To improve health outcomes in new and existing communities by identifying those determinants of health which are likely to be influenced by development proposals.

CA11