

Appendix A, Part 2 – Consultee Comments Relating to Changes in the Final LTP4/SEA ER

Query / Comment on the Strategy	Strategy Response
External consultation responses to SEA Environmental Report and LTP4	
Baldons Parish Council (14820485)	
<p>Sandford Park and Ride: Baldons PC has serious concerns and objections to this proposal. Whilst the intent may seem a practical solution to helping to remove traffic from Oxford's inner road network it is a development in the Green Belt which we oppose. It will inevitably lead to further pressure to develop land south of Grenoble road for housing which has been resisted by Baldons PC, SODC and many other bodies.</p> <p>New Bridge over the Thames: The proposed new bridge over the Thames with a road link to the M40 south of the Baldons will create an outer ring road on the south side of the city which, together with the Sandford Park and Ride site, will create an area of land in between and in the Green Belt. This will put even more pressure on development and for expansion of the city boundary. We believe that the City Council will continue to press for such Green Belt development with scant concern for the inevitable loss of rural villages like the Baldons.</p>	<p>We are shortly to commence a more detailed study into options for P&R and we will consider comments during this.</p> <p>The development of any new road link would have future consultation before being implemented</p>
Banbury Town Council (14736965)	
<p>Traffic calming along A361 the South Bar Street/ Horsefair corridor – Banbury Town Council oppose the need for introducing traffic calming methods, as traffic generally flows freely through this corridor. The Council is concerned that introducing traffic calming methods in this area, will further increase the starting/stopping of vehicles' engines which, in turn, will cause an increase in air pollution (contrary to the aims of the Air Quality Management Area).</p>	<p>Traffic management along A361 the South Bar Street/ Horsefair corridor: This is an historic corridor which has recently been declared an Air Quality Management Area (AQMA) due to traffic impact. Measures to encourage alternative routing thus reducing the number of vehicles using this route and improve traffic flow will be examined to address the air quality issues and conserve the historic core of Banbury.</p> <p>The uncertainty relating to air pollution effects from the traffic calming measures at Banbury have been included in Appendix F of the ER.</p>
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)	
<p>Having read the documents that form part of this consultation I have a number of concerns I would like to raise. Policy Document: Connecting Oxfordshire's Goals and Objectives We support the objective to 'Mitigate and wherever possible enhance the impacts of transport on the local built, historic and natural environment'.</p>	<p>No change to LTP4 and SEA ER.</p>
<p><i>Oxfordshire now and in 2031</i> Emissions from transport – reference should be made here to the impact of emissions, particularly NOx, on the natural environment. Many of the priority habitats and designated sites in Oxfordshire are sensitive to nitrogen deposition. Rare habitats such as lowland hay meadows and calcareous fens, for which Oxfordshire is particularly important, require low nutrient input. Nitrogen deposition from vehicle emissions acts as a fertiliser, favouring fast growing species which out compete and dominate the habitat, resulting in a loss of botanical diversity.</p>	<p>No change to LTP4.</p> <p>The comments on the impacts of nitrogen deposition on the habitats and designated sites have been reflected in the Biodiversity chapter of the ER.</p>
<p><i>Enhancements to Road Capacity</i> We note that widening of the A34 is included as a possible measure to increase capacity, and wish to highlight concerns in relation to the impacts this could potentially have on the Oxford Meadows Special Area of Conservation (SAC) and Wytham Woods SSSI which lie adjacent to the A34 at Oxford.</p>	<p>The A34 is part of the Strategic Road Network and consequently any impacts resulting from changes to the road beyond the project already funded will be considered in the Highways England-led study into the Oxford – Cambridge Expressway.</p>
<p><i>Protecting and enhancing the environment.</i> We welcome the recognition in paragraphs 155 and 156 that the natural environment needs to be considered at the outset of each transport infrastructure stream to allow consideration of environmentally less damaging options, and that the mitigation hierarchy (avoid, mitigate, compensate) will be followed. However, there would be significant benefit for some screening of biodiversity impacts to be undertaken at this stage in the process. In particular, please see our comments relating to Habitats Regulation Assessment and impacts of Oxford BRT route 3 below. We welcome that consideration will be given to how biodiversity gains can be delivered through design of new schemes and management of transport assets.</p>	<p>A HRA Screening Assessment has been undertaken and has been updated following public consultation - this is provided in Appendix D of the ER.</p>
<p>Policy 25: We would suggest that it would be appropriate for this policy to seek to avoid, rather than just reduce, environmental impacts. Reference should be made not only to impacts of operation of the transport network, but also to the design and construction of new transport projects. In line with the Oxfordshire Biodiversity Strategy, we suggest that this policy identifies the Conservation Target Areas (CTAs) as key areas for delivery of biodiversity enhancements. We also consider that the aspiration to "where possible provide environmental improvements, particularly in Areas of Outstanding Natural Beauty, Conservation Areas and other areas of high environmental importance.", is not ambitious enough. See section on road verges below for more detail on this.</p>	<p>Changed policy wording to "seek to avoid". Environmental improvements are not <i>always</i> possible.</p>
<p><i>Improving air quality:</i> As mentioned above, consideration needs to be given to the effects of poor air quality on the natural environment as well as on human health.</p>	<p>As per strategy response above, further reference is made in the ER to the impacts of poor air quality on the natural environment.</p>
<p><i>Air travel:</i> We are concerned by the implications of paragraphs 96 and 97 and Policy 11. The significant carbon emissions from air travel are well known. Climate change has very serious implications for wildlife as well as people and any proposed increase in air traffic is clearly of concern in relation to climate change. In addition a significant expansion of Oxford Airport has wildlife implications from disturbance and increase in local air pollution, particularly NOx, as well as implications on people's enjoyment of the natural environment in the vicinity. Paragraphs 96 and 97, and Policy 11, need to be reworded so that it is clear that all three pillars of sustainable development (economic, environmental and social) are given clear weight in any decision. At present Policy 11 ("Oxfordshire County Council will support the development of air travel services and facilities that it considers necessary to support economic growth objectives for Oxfordshire.") considers only economic development with no consideration given to environmental or social factors. In the context of the fact that this document quite rightly contains a chapter on "Cutting Carbon" the lack of any reference to environmental impact here is puzzling. Further consultation should take place before any proposals for significant expansion of air traffic at Oxford Airport are taken forward.</p>	<p>Policy 11 of LTP4 reflects the policy of the Strategic Economic Plan. The number of aircraft movements at London Oxford Airport has reduced substantially since the 1990s and so air traffic in and out of the airport would have to increase significantly before there could be said to be a long-term expansion. In addition, if the airport wished to develop new facilities such as a new terminal, it would have to gain planning permission and be subject to a separate EIA including public consultation.</p>

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<p><i>Cutting Carbon:</i> We greatly welcome the inclusion of paragraphs 113 – 151 in the chapter Cutting Carbon. Climate change has very serious implications for wildlife as well as people. For both reasons, measures to reduce carbon emissions from transport should be an immediate and very high priority. We would expect to see significant investment in this area. In addition many of the measures set out here, including increasing levels of walking and cycling, and reducing the emissions from vehicles, will also help to reduce NOx deposition. NOx deposition is a serious threat to many wildlife habitats in the UK through increasing fertility, as already explained in the paragraph above: “Oxfordshire now and in 2031”. Furthermore, measures to reduce air pollution and provide additional cycling and walking opportunities/routes will, if well managed, also provide an opportunity to enhance people’s enjoyment of the natural environment. What appears to be missing from this chapter, particularly in the light of the potential proposals to increase use of Oxford Airport, is anything that deals with the serious implications for carbon emissions from any increase in air travel. This should be rectified.</p>	<p>See previous response to comment entitled ‘Oxfordshire now and in 2031’.</p>
<p>Oxford Transport Strategy <i>Key Challenges:</i> We suggest that Key Challenge 8 should recognise the impact of low air quality on the natural environment as well as on human health. <i>LTP Objectives:</i> The table on page 6 of the Oxford Transport Plan identifies an LTP goal to ‘protect, and where possible, enhance Oxfordshire’s environment and improve quality of life’, an approach that we welcome. However, it is disappointing not to see this reflected in the corresponding objective which relates to accessibility and visitor experience. We recommend inclusion of an objective that recognises the value of Oxford’s wildlife (some of which is designated at a European level) and seeks to protect and enhance it.</p>	<p>While this is not an objective, this is covered in two policies in the LTP4: policy 1 and policy 24.</p>
<p><i>Oxford BRT routes – Line 3:</i> Despite the above goal to protect Oxfordshire’s environment, part of the alternative route for line 3 of the Bus Rapid Transit route, which seeks to link Hollow Way to Lye Valley Road, would have significant detrimental impacts on designated sites. The proposed route crosses between two sections of the Lye Valley Site of Special Scientific Interest (SSSI). The fenland habitat type at the Lye Valley is so rare that only 20 hectares remain in good condition in the whole of England. The proposal would cause severe fragmentation of this nationally designated site; it would also be highly likely to have a detrimental impact on the hydrology of this spring fed fen habitat. This route also involves direct land take from the Lye Valley and Cowley Marsh Local Wildlife Site (LWS), which supports important limestone grassland habitat and the Lye Brook. It also involves direct land take from a proposed Local Wildlife Site (Lye Valley and Cowley Marsh proposed Local Wildlife Site extension) which is also a SLINC (Lye Valley Fen and Gardens Site of Local Importance for Nature Conservation), at the northern end of the proposed route. Lye Valley is also one of the main project sites for the Wild Oxford project, a successful project between BBOWT and Oxford City Council which has been further enhancing the wildlife through involvement of local people. Together the SSSI, Local Wildlife Sites and SLINC form an important wildlife corridor in this part of the City, which would be severed should this alternative route be taken forward. Given this significant impact on biodiversity, we are surprised at the SEA conclusions with regard to biodiversity objectives for the Oxford Transport Strategy, more detail on this is provided below.</p>	<p>Changes have been made to the maps and text of the draft Oxford Transport Strategy following public consultation to allow more flexibility in the choice of the alternative transit route (removing reference to the Bus Rapid Transits away from the roads).</p> <p>Consequently, the SEA ER continues to state that the impacts of the OTS on SSSIs will need to be considered further at the start of scheme design, but no further detail has been provided with regard to potential impacts on specific SSSIs or LNRs such as the Lye Valley/Cowley Marsh at this stage. We acknowledge the importance of these national and local conservation sites and will ensure that any route alignments that are developed, thoroughly assess the impacts on these sensitive sites and provide suitable mitigation (e.g. avoidance, where appropriate/feasible).</p>
<p><i>The future of Park and Ride:</i> The Oxford Transport Strategy states on page 14: “The closure of the Park & Ride car parks at Water Eaton, Peartree, Seacourt and Redbridge (which will be phased to coincide with the opening of the alternative proposed sites) presents the opportunity for redevelopment.” It is not clear if the implications of possible development at these sites have been taken into account in the SEA and HRA. We point out that certain types of development on these sites will lead to significant additional traffic generation which will therefore considerably reduce any benefits in reducing NOx pollution (including reduced deposition on sensitive fen and meadow habitats close to Oxford, including the SAC and numerous SSSIs and LWSs) which may result if traffic congestion can be reduced by moving the Park and Rides further from Oxford. Strong consideration should be given to provision of Green Infrastructure across a major part of at least some of the released Park and Ride sites. As well as providing wildlife habitat and a valuable resource for local people such provision could also provide a buffer between roads such as the ring-road (Redbridge) and the A34 (Seacourt) and the City residential areas which will help, particularly if there are trees, to reduce the impact of the pollution and noise from these roads. Also Seacourt Park and Ride is in the floodplain making it unsuitable for many types of development and making it particularly suitable for provision of species-rich wet meadow / wetland habitat that could also help in increasing flood capacity and therefore serve to reduce the potential for flooding of existing developed areas, such as nearby residential areas that are highly vulnerable to flooding.</p>	<p>No change to LTP4.</p> <p>The ER, Area Assessment for Oxford in Appendix F of the ER and the HRA have been updated to reflect the comments received.</p> <p>We shall be undertaking a study into the options for Park & Ride starting later this year. The opportunities to provide green infrastructure in areas previously occupied by roads and parking was presented in the draft Area Assessment for Oxford in Appendix F of the ER. However, these opportunities have now been expanded to include consideration of the further enhancements that green infrastructure could provide at the Park & Ride sites.</p>
<p><i>Mass Transit and Walking and Cycling:</i> In general (and save for the very serious concerns we have regarding the proposal for an alternative route for Line 3 through the Lye Valley), we welcome the proposals for a modal shift from private car use towards walking and cycling, in particular, and buses and rail, for reasons already given in the paragraph on Cutting Carbon above. A move towards walking and cycling, electric/hybrid buses, and electric trains, will be of significant benefit in reducing NOx emissions, which have significant wildlife, as well as human health, implications.</p>	<p>No change to LTP4 nor SEA ER.</p>
<p>Area Strategies: It is apparent that there are a number of significant transport schemes proposed, including 6 new Park and Ride sites, a crossing of the River Thames in the Science Vale area, numerous new roads including one in close proximity to Furze Brake LWS, a road bridge adjacent to/within the Gavray Drive Meadows LWS, the West End Link Road at Witney which crosses the Windrush and is upstream of Grimes Meadow LWS, increased capacity of the A40 adjacent to the Oxford Meadows SAC, and the A420 alongside Tuckmill Meadows SSSI. It is essential that thorough assessment is undertaken of direct impacts including habitat loss and fragmentation, as well as indirect impacts, particularly on hydrology of wetland sites and air quality. This assessment must be undertaken at an early stage in order that where necessary, less damaging options can be taken forward.</p>	<p>The ER and associated appendices (appended to the ER) assess the high level policies, area strategies and supporting strategies as part of the SEA. A thorough assessment of the environmental effects of individual infrastructure elements will be assessed at the project level.</p> <p>We shall be undertaking a study into the options for Park & Ride starting later this year and we have noted these points.</p>

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<p>SEA: Biodiversity: We have some concerns regarding the assessment of impacts on biodiversity within the SEA. Particularly in terms of the level of assessment of impacts that has been undertaken, and in terms of how conclusions have been reached. Section 4.6.4 of the SEA states that 'The LTP4 has been developed to ensure that its measures do not affect the conservation status of nature conservation sites and UK priority habitats and species i.e. by the fragmentation, damage or loss of habitats by roads, increasing recreational pressures on sensitive flora/fauna, and elevating air and noise pollution or polluting aquatic environments, for example through road surface runoff.'</p> <p>However, the mitigation and enhancements measures identified in the Area Assessments in Appendix F indicate impacts on sensitive sites have yet to be identified. We find the assessments in Appendix F to be somewhat inconsistent, concluding a minor negative impact at a local level for the Oxford Transport Strategy (which includes an option for a road through a SSSI and identifies potential impacts on 2 SACs), whereas a major negative impact is identified for the Science Vale where the impacts would seem to be less significant.</p> <p>In section 6.3.7 the SEA states that 'No significant strategic impacts on biodiversity have been identified as a result of implementing the LTP4'. And yet, it then identifies that there may be an 'overall adverse effect upon biodiversity through the loss and fragmentation of habitats with associated impacts on species of principal importance and European Protected Species... There is also potential for negative impacts on some SSSIs'.</p> <p>Section 6.3.13.1 states: 'The negative effects predicted on landscape character, soils and biodiversity are chiefly due to the cumulative effect of transport measures in combination with development pressure and land-take within greenfield sites and the countryside in general. Few of the Area Strategies will, alone, lead to any significant impacts on a strategic scale, but the additive effect of loss of greenfield land would lead to a significant overall effect.' Therefore, it would appear that contrary to the statement in 6.3.7, significant impacts on biodiversity are likely.</p>	<p>No change to LTP4.</p> <p>The Area Assessments in Appendix F of the ER have been reviewed for consistency and updated (where appropriate) and the biodiversity conclusions of the ER amended accordingly.</p> <p>We have updated the ER text to explain the impacts on biodiversity from the LTP4 that are described relate to impacts of the Area Strategies alone. We have also included reference to the uncertainty of the significance of cumulative effects on biodiversity, which will require further assessment at project level, when further details on the nature and alignment of schemes is available.</p>
<p>Air Quality: The SEA considers the impacts of air quality only in relation to human health, and as stated above it would be appropriate to also consider impacts on the natural environment. We note that in some areas there may be increases in traffic emissions due to rerouting, increased road capacity and new road and rail infrastructure and strongly recommend that impacts on the natural environment as a result of these increases are considered.</p> <p>Section 6.3.13 on Cumulative Impacts does not address cumulative impacts on air quality. We consider this to be of particular relevance in relation to NOx emissions and their impacts on habitats such as the Oxford Meadows SAC which lies adjacent to both the road and rail network where there are various schemes coming forward including East West Rail Phase 1 and the Northern Gateway development.</p>	<p>Policy 24 of the LTP policy document states our commitment to the natural environment: Oxfordshire County Council will seek to avoid negative environmental impacts of transport and where possible provide environmental improvements, particularly in Areas of Outstanding Natural Beauty, Conservation Areas and other areas of high environmental importance.</p> <p>A statement has been added to Section 6.3.13 of the SEA ER to address air quality impacts.</p> <p>The HRA in Appendix D of the LTP4 (which has been updated since public consultation and agreed with Natural England) considers the air quality impacts on the internationally designated conservation sites including Oxford Meadows SAC.</p>
<p>Habitat Regulations Assessment. The HRA concludes no likely 'strategic' significant effects from the LTP4. We are concerned that insufficient information has been presented within the HRA to conclude no likely significant effects in relation to Cothill Fen, Oxford Meadows and Little Wittenham SACs. All measures to mitigate potential impacts on these SACs is dependent on assessments at the project level. In relation to Oxford Meadows it is indicated that the proposed zero emission zone proposals will help offset NOx emissions within the city centre. As we have stated numerous times in this response, assessments of air quality need to be made specifically in relation to the natural environment, looking at critical levels of NOx at Oxford Meadows and in-combination effects with other schemes.</p>	<p>The HRA has been updated following consultation with Natural England and follows the DMRB Volume 11 environment assessment guidance and screening stages. The assessment specifically references roads within 200m of the European sites that are likely to experience additional traffic as a result of the LTP4 to enable assessment of traffic derived NO_x on the designated interest features.</p> <p>The conclusions of the HRA have been agreed with Natural England.</p>

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<p>Provision of wildlife habitat on road verges and other open spaces managed as part of the road network (relevant to “Policy Document”, “Oxford Transport Strategy” and “Area Strategies”)</p> <p>We have separated out this section as it is relevant to several of the different documents, so rather than repeat the same text for each document it is included only once. Please ensure it is considered in relation to each of the above documents.</p> <p>We welcome a number of statements relating to the above in the documentation including:</p> <p>Volume 1 paragraph 156: “In managing our transport assets, we will consider how we can make positive biodiversity gains, including protecting and enhancing habitats for bees in line with the Council’s resolution in July 2014.”</p> <p>Volume 1 paragraph 157: “We will work with partners to develop Oxfordshire’s ‘green infrastructure’, which includes our public rights of way network.”</p> <p>SEA section 4.6.4 “As the LTP4 is delivered, it will also need to ensure its measures align with guidance on the management of road verges (e.g. as provided for Road Verge Nature Reserves in Oxfordshire), and guidance provided in ‘Biodiversity and Planning in Oxfordshire’ (Berks, Bucks and Oxon Wildlife Trusts et al 2014).…… Delivery of the LTP4 also has potential to support improvements for biodiversity, for example, by incorporating principles on creating new biodiversity areas or restoring existing ones, implementing WFD measures, and supporting linkages between biodiversity sites as part of plans for improving GI and fostering ‘living landscapes’, as promoted by the UK wildlife trusts.”</p> <p>SEA section 7.6 “Consideration should be given to integrated habitat improvements as part of schemes, including (but not limited to) opportunities to plant native peripheral trees and shrubs, which can provide improved habitats for birds, invertebrates and small mammals, different mowing regimes and management to ensure pollutants in run-off from roads are intercepted or otherwise reduced.”</p> <p>However we consider that there needs to be much more ambition and detail with respect to measures to support biodiversity on road verges and other green spaces managed as part of the road network, so that Oxfordshire County Council can satisfy the requirement to have due regard to biodiversity under the NERC Act 2006. The road verge network, both in towns and rural areas, provides potentially a vast area that can support wildlife, made even more valuable by the fact that as it is necessarily in linear corridors it potentially provides a corridor for the movement of wildlife. The wildflowers that could grow here will benefit numerous species, including pollinators. DEFRA’s National Pollinator Strategy 2014 calls for: “Ensuring good practice to help pollinators through initiatives with a wide range of organisations and professional networks including managers of public and amenity spaces, utility and transport companies, brownfield site managers, local authorities, developers and planners.”</p> <p>The County Council is to be congratulated for its Road Verge Nature Reserve network and the management of these for wildlife should continue. In addition some other verges are also already rich in wildlife. However these areas are a fraction of the entire network and the potential is significant.</p> <p>The Transport Strategy, including the Policy document, Oxford Transport Strategy, and Area Strategies should include proposals so that across the vast majority of road verges in both urban and rural areas, cutting is avoided until flowers have set-seed wherever possible (e.g. unless there is a clear safety implication) – for further details see the Plantlife guidelines for local authorities:</p> <p>If concerns are raised about things looking “untidy” then this could be countered by action taken to explain why verges are being cut less often, and by promoting the benefits of reduced road verge cutting, by press articles and signage. In addition it would be of great benefit to work towards a situation where cuttings are removed from site as this will reduce the fertility of the soil. Benefits of reduced fertility include an increase in species-richness and also a reduction in the rate of plant growth, allowing further reductions in the amount of mowing required. It also provides a by-product in the form of cuttings which at least one local authority is looking into putting to an economic good use through anaerobic digester schemes.</p> <p>Green hay spreading on selected verges, using freshly cut hay from species-rich meadows, would also increase the wildflower diversity of road verges further. With such measures road verges, and many other grassed areas close to roads, could make a significant contribution to the County’s biodiversity that would also be in keeping with: 1. the Oxfordshire Partnership’s “Oxfordshire 2030” pledge to: “Protect and enhance the biodiversity of the county.”; 2. the DEFRA National Pollinator Strategy; 3. the DEFRA Biodiversity 2020 strategy and the government’s Natural Environment White Paper; 4. the requirement under the NERC Act 2006 for the authority to have “due regard to biodiversity”</p>	<p>LTP4 paragraphs 168 to 174 and policies 1 and 24 have been amended to reflect a pro-active approach to avoiding environmental damage.</p> <p>These comments have been considered and reflected in the SEA deliverables.</p>
<p>Bloxham Parish Council (14628901)</p>	
<p>No apparent consideration has been given in this County-wide study of the impact on the villages that the A361 passes through. We understand that one of the key inhibitors for OCC in making a plan for the A361, particularly for lorry routing, is an almost total lack of data on the source and destination of lorry traffic and the routes taken through the county.</p> <p>There has been no assessment of the Air Quality of this route through the villages especially in Bloxham. Due to the restrictions of the highway within the village, often vehicles are standing waiting for the traffic flow to recommence. This results in a concentration of emissions that are known to be harmful. This is a particular problem at peak times as children make their way to and from school.</p>	<p>We expect that the A361 will have a route strategy developed for it and this will take into account concerns of Bloxham Parish Council.</p>
<p>Bus Users Oxford (14549989)</p>	
<p>We support measures to uphold quality of life, and note that even a frequent bus service offers a much lower environmental impact than car traffic carrying the equivalent number of people, in terms of noise, localised air quality and atmospheric CO2.</p>	<p>No change to LTP4 or SEA ER required.</p>
<p>Cotswolds Conservation Board</p>	
<p>The Cotswolds Conservation Board wish to make the following representations in respect of the above Local Transport Plan consultation for Oxfordshire. The Board supports references to the recognition of the AONBs in Volume .1. at paragraphs 24, 25,158 (including reference to Management Plans) and Policy 25 (in accordance with Section 85 of the CRoW Act). The Board also supports recognition of landscape as a matter for consideration as part of the SEA process as included in paragraph 153.</p>	<p>No change to LTP4 or SEA ER required.</p>
<p>However, it is recommended that additional reference is made to the following key issues:</p> <ul style="list-style-type: none"> The proposed housing growth of Oxfordshire (100,000 new homes by 2031) and other growth generally is stated but the implications of this growth, particularly the cumulative impact, on the nationally protected Cotswolds, Chilterns and North Wessex Downs AONBs has not been fully investigated. Full consideration should be given within the Plan as to the impact of traffic growth, pollution, road building, and new development generally on the special qualities of the AONBs. Is it possible to achieve this level of growth in or near the AONBs within the restrictions of Section 85 of the CRoW Act 2000 and in accordance with paragraphs 115 and 116 of the NPPF? 	<p>No change to LTP4.</p> <p>The cumulative effects section of the Science Vale Area Assessment (Appendix F of the ER) discusses the potential for effects on the AONB from housing growth; however, further consideration has now been made of the likely impacts to reflect the comments received.</p>

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<ul style="list-style-type: none"> There are specific issues that relate to AONBs and reducing the impact of roads on the nationally protected landscape. These include particular care over road signage clutter (see Policy 26); care over street lighting design to protect the dark night skies of the AONB and their heritage assets; issues over tranquillity and transport noise; road verge management; litter associated with roads and allowing Parish Council's the ability to manage and clean up road verges in the AONB; good design and materials appropriate to the character of the Cotswolds; issues over the protection of narrow lanes from rat running and erosion of verges from HGVs and high volumes of traffic; consideration of the creation of "quiet lanes" or rural lanes where walkers/cyclists/riders have more priority/greater safety. It is recommended that specific reference to these issues are included within the Plan for the AONBs. 	<p>No change to LTP4.</p> <p>Many of the issues relating to the North Wessex Downs AONB are already considered in the Science Vale Area Assessment (Appendix F) of the ER. However, further detail has been incorporated within the Science Vale Area Assessment (Appendix F) to ensure all highlighted issues (e.g. road verge management, litter and consideration of quiet lanes) are addressed. The ER has also been updated accordingly.</p>
<ul style="list-style-type: none"> The strategic role of National Trails and National Cycle Routes is not clear from the Plan. 	<p>The Ridgeway and Thames Path are now mentioned in the Oxfordshire Now section of LTP4. National Cycle Route 5 is now included in the Science Vale Cycling Strategy, along with further details about the role of the National Cycle Network.</p>
<ul style="list-style-type: none"> There is no clear link between the benefits of good rural transport and tourism. Economic growth should include reference to tourism and the success of future tourism in the Cotswolds is dependent on having a landscape and settlements that people still want to visit for their special qualities. 	<p>No change to LTP4.</p> <p>Further links between tourism and landscape value have been provided in the baseline environmental chapter of the ER.</p>
<ul style="list-style-type: none"> There is a recognition of the health agenda but there are additional links to be drawn between the AONB and the ability to gain access to the countryside/health/leisure/ and green infrastructure generally. 	<p>No change to LTP4.</p> <p>Links between the AONB and access to the countryside/health/leisure/ and green infrastructure generally are provided in the baseline chapter of the ER.</p>
<ul style="list-style-type: none"> Although the LTP recognises walking is "free" (paragraph.123) PROW, paths, National Trails etc all require long term investment, support from volunteers (which has to be managed and paid for) and constant maintenance. Therefore, new development in particular should make appropriate contributions through CIL to supporting the existing network of rights of way. 	<p>No change to LTP4</p>
<ul style="list-style-type: none"> In respect of CIL, funding should support the wider green infrastructure, including rights of way and not just road improvements. 	<p>No change to LTP4</p>
<ul style="list-style-type: none"> Reference should be made to supporting existing/new community transport schemes, particularly for rural areas. 	<p>LTP4 policy 13 has been changed and accommodates this</p>
<ul style="list-style-type: none"> We recommend reference to the Cotswolds AONB Management Plan 2013-2018 and its related Position Statements (which include guidance on Verges, Tranquillity and Dark Night Skies and Housing & Development). 	<p>No change to LTP4.</p> <p>The Cotswolds AONB Management Plan is already referenced in Appendix B of the ER (together with the other relevant AONB Management Plans); however we have now incorporated reference to its associated position statements.</p>
CPRE	
<p>The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) is primarily concerned to ensure that transport in the county enables people living and working in the countryside, villages and country towns to enjoy an environment protected from intrusive inter-urban traffic and be able to use all modes of travel on public roads themselves. This very rural county is about to accommodate unprecedented population influx and demand for travel on inadequate infrastructure.</p>	<p>No change to LTP4.</p>
SUMMARY of detailed comments provided	
<p>1. Overarching goals and Objectives: overall supportive of goals and objectives. However, find it hard to reconcile goal 3 with actions proposed in plan.</p>	
<p>2. The growth figures on which LTP4 is based are unsound and unsustainable, and have not been subject to public consultation.</p>	<p>The growth figures are based on the Strategic Economic Plan produced by Oxfordshire LEP. No change to LTP4.</p>
<p>3. Lack of focus on existing rural transport needs.</p>	<p>The policy document, cycling strategy and freight strategy all take into account existing rural needs and the policy document notes how Neighbourhood Plans – often developed by rural communities – should interact with LTP4. No change to LTP4.</p>
<p>4. The Park & Ride strategy will undermine both the Green Belt and the sustainability of the broader region in favour of continued expansion of Oxford.</p>	<p>We are shortly to commence a more detailed study into options for P&R and we will consider comments during this. No change to LTP4.</p>
<p>5. Taken together, the proposals represent a concerted attack on the Oxford Green Belt.</p>	<p>We are shortly to commence a more detailed study into options for P&R and we will consider comments during this. The development of any detailed proposals would be subject to further consultation and appropriate environmental analysis and mitigation before being implemented. No change to LTP4.</p>
<p>6. There is a lack of information relating to key areas including: A40 Rights of Way Green Infrastructure Plan.</p>	<p>These are mentioned in the policy document (Volume 1) and are/will be subject to separate detailed guidance (in the case of Rights of Way and Green Infrastructure Plan) and a process of consultation on options (in the case of the A40 between Oxford and Witney).</p>
<p>7. There is a lack of Plan B for highly ambitious projects such as the transit tunnels.</p>	<p>The transit tunnels are part of our Oxford Transit Strategy but would be part of more detailed analysis and consultation process that would take place as part of that project. This would include the assessment of alternatives to transit tunnels. No change to LTP4.</p>
<p>8. This strategy should have complied with the Duty to Co-operate, but there is no evidence that this has been complied with.</p>	<p>This is a Local Transport Plan, not a Local Plan, and is subject to different requirements in development. No change to LTP4.</p>
<p>9. The commitment to ongoing road maintenance should be clarified.</p>	<p>We believe that policies 15 and 16 demonstrate our commitment to road maintenance, although our ability to implement such policies are dependent on the funding available from Government and other sources. No change to LTP4.</p>

Query / Comment on the Strategy	Strategy Response
<p>10. The proposal to expand London Oxford (Kidlington) Airport is unacceptable and in conflict with the County's own Strategic Environmental Assessment.</p>	<p>Policy 11 of LTP4 reflects the policy of the Strategic Economic Plan. The number of aircraft movements at London Oxford Airport has reduced substantially since the 1990s and so air traffic in and out of the airport would have to increase significantly before there could be said to be a long-term expansion. In addition, if the airport wished to develop new facilities such as a new terminal, it would have to gain planning permission. Such facilities would be subject to a separate Environmental Impact Assessment, with detailed consideration of those potential strategic impacts identified in the LTP's SEA.</p>
<p>11. The Knowledge Spine – the LTP4 does not take into consideration the Government's stated policy of an Oxford-Cambridge expressway.</p>	<p>This is now addressed in the Supporting Growth and Economic Vitality section of the Plan.</p>
<p>12. The Plan is heavily dependent on improvement of the A34, although significant proposals are not yet in place.</p>	<p>This is now addressed in the Supporting Growth and Economic Vitality section of the Plan. However, detailed proposals for the A34 are the responsibility of Highways England.</p>
<p>13. The changes to certain Road Classifications are questionable.</p>	<p>No change to LTP4.</p>
<p>14. The Rail strategy requires better integration with other modes of transport and consideration of new stations at sites such as Kidlington.</p>	<p>We are currently revising our rail strategy to take into account LTP4 and the SEP.</p>
<p>15. Waterways, Footpaths and Cycleways – improvement to Wilts & Berks Canal, support for AONBs, and national trails.</p>	<p>The policy document and the cycling strategy address walking and cycling for pleasure. No change to LTP4.</p>
<p>16. Air Quality.</p>	<p>Detailed environmental assessments will be carried out, if appropriate at specific locations e.g. in and around Chipping Norton during the delivery of transport infrastructure schemes. Such assessments will consider the effects of the schemes on relevant environmental receptors, which may include air, water, heritage, landscape and public amenity/health.</p> <p>The requirement for a detailed assessment of air quality and noise will be determined at the scheme level when further details and the nature of the schemes are available, thus no change to the wording in the LTP4.</p>
<p>17. We welcome the discussion of the impacts of Noise and Light Pollution within the Strategic Environmental Assessment and would like to understand what policies and mitigation measures will be put in place as a result.</p>	<p>Appendix F 'Area Assessment' Report describes the mitigation measures that would be implemented where noise and light pollution impacts might be experienced at the project level. Examples of such measures described will include (but not be limited to) the use of temporary acoustic screening where appropriate during construction, ensuring that freight uses the most appropriate routes to minimise noise, use of low noise surfacing when delivering new roads, walking and cycling routes, noise assessments at project level and detailed landscape and visual impact assessments at project level to consider light pollution.</p>

Query / Comment on the Strategy	Strategy Response
<p>18. Volume 2 Area Strategies. Concern about the timeliness of the Local Transport Plan being brought forward before the Cherwell Local Plan has been agreed. Concerns about Banbury, Bicester, Oxford, Science Vale and Witney area strategies, the Oxford-Cambridge Expressway and lack of policies to increase the capacity of the A34 corridor.</p>	<p>The LTP4 is a 'living document'. It covers a 16 year period and we live in a world of constant change. As such the plan will be revisited on a regular basis and updated to reflect new priorities and new realities in Oxfordshire as those 16 years come and go.</p> <p>Regarding the Cherwell Local Plan, the Banbury and Bicester draft area strategies were developed in parallel with the modifications to the Cherwell Local Plan and we have amended the strategies to take account of the modifications to the level of growth proposed for the area. We agree that the A361 is an important road and we expect to be developing a route strategy for the A361 over coming years, on similar study principles to our A420 route strategy.</p> <p>The proposed Oxford – Cambridge Expressway is at an early stage of development and is being led by Highways England. We explain our position on this in the LTP4 policy document. We plan to work closely to ensure that Oxfordshire's interests are represented in the development of this project.</p> <p>The Witney area strategy intends to cover developments in the town itself. However, we agree that both the A40 and providing connections to Witney are important issues and they are inter-related ones. We are about to begin consultation on proposals for improving the A40 and connections to Witney, which address the concerns raised here. This is covered in the LTP4 policy document in the A40 section.</p> <p>There are several concerns raised about projects for Oxford. Transport developments proposed in Oxford will be subject to a development and consultation process during which environmental and heritage concerns will be addressed in detail. We are shortly to commence a more detailed study into options for P&R and we will consider comments during this.</p> <p>LTP4 is a policy and strategy document covering the next 16 years. It identifies proposals that the Council considers necessary to deliver the Local Plans and Strategic Economic Plan, as well as Government guidelines such as those on carbon reduction. LTP4 does not need to identify definite funding for proposals, nor do the inclusion of proposals in LTP4 preclude the usual detailed consultation and development of transport projects that take place.</p>
<p>19. The A420 Strategy is very welcome but needs further detail to be convincing.</p>	<p>This has been revised and expanded following consultation.</p>
<p>20. Strategic Environmental Assessment (SEA). Concern that the Local Transport Plan should have a clear overall mitigation strategy that is deliverable at the Plan stage, rather than at the individual scheme or project level. Concern that the SEA falls short of the regulatory requirements.</p>	<p>The mitigation strategy is provided in Appendix F 'Area Assessment' Report, together with an assessment of the potential cumulative impacts that are likely to result from the strategy. However, it should be noted that some assessments are not possible at this strategic level, particularly in the absence of some project level details or details of others' plans that are still emerging. For some area assessments (e.g. Science Vale), further detail on the cumulative impact assessment has been provided.</p>
<p>21. There is a lack of independent scrutiny.</p>	<p>We disagree that there has been a lack of scrutiny. The development of LTP4, the draft LTP4 and its consultation feedback have been subject to the scrutiny of a cross-party County Council Members Working Group. Furthermore, the adoption of the document will not take place until it has been subject to the democratic scrutiny process of a Council Cabinet meeting and then full Council.</p>
<p>Comments on SEA Appendix</p>	
<p>Comments on purpose of SEA and overall likelihood of compliance</p>	<p>The SEA is believed to be fully compliant with the SEA Regulations and closely follows the OPDM Guidance (2005), together with using our experience of undertaking numerous SEAs of similar transport plans.</p>
<p>(1) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes</p>	<p>Appendix B 'PPP' of the SEA considers those regulations, policies and guidance documents of most relevance to the LTP4 including the relevant core strategies. We note the omission of Oxford City Council's emerging Heritage Plan, which has now been incorporated into the appendix and considered in the SEA.</p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Plan or programme; Schd 2 (3) The environmental characteristics of areas likely to be significantly affected</p>	<p>Our SEA ER describes the environmental characteristics of areas likely to be significantly affected (i.e. those relevant aspects of the environment and their likely evolution without the plan), thus providing a concise evidence base for environmental problems, prediction of effects, and monitoring.</p>

Query / Comment on the Strategy	Strategy Response
Any existing environment problems which are relevant to the Plan or programme including, in particular, those relating to any areas of environmental importance	EU designated wildlife sites are described in Section 4.6.1 'International Conservation Sites – Natura Sites) of the ES, together with reference to their assessment in a Habitat Regulations Assessment report. As there are 114 national conservation designations within the study area, it is not considered appropriate for the ER to consider the environmental problems affecting all of the individual designations. However, where impacts on specific national conservation sites have been identified in the impact assessment, further consideration has been given to the existing problems/pressures on those sites.
Environmental protection objectives	SEA objectives have been developed in Table 5.1 of the ER, which are a recognised way of considering the environmental effects of a plan. They serve a different purpose from the objectives of the plan covered in Section 3. Appendix B 'PPP' of the SEA considers those plans of most relevance to the LTP4 including AONB Management Plans, NPPF etc. The National Heritage List and Heritage at Risk Register are considered in Section 4.10 of the ER.
Assessing the likely significant effects on the environment	Appendix F 'Area Assessment of the ER provides the detailed environmental assessment, which considers the nature, timescale of impact, reversibility, spatial scale and frequency, as referenced in CPRE's comments. This assessment also considers the cumulative impacts of the plan. Under Article 3(3) and 3(4), environmental assessment is required for certain categories of plans and programmes where they are determined to be likely to have significant environmental effects. Consequently, an SEA was carried out.
Measures envisaged to prevent, reduce and offset any significant adverse effects on the environment	Mitigation and enhancement measures are detailed in Appendix F 'Area Assessment of the ER, and only summarised in the SEA ER.
An outline of the reasons for selecting the alternatives dealt with	The assessment of the TP4 and its alternatives (alternative objectives and policies) are presented in Section 6 of the ER. OCC. LTP4 is a policy and strategy document and as such does not commit to specific routes or options for Oxford P&R and BRT. A study of options and an assessment of alternatives is to be undertaken at a project development stage when individual schemes are focused on.
Limitations and difficulties	Section 1.3.2 of the ER describes these. It not typical to commission project level surveys at this high strategic level to fully understand all environmental effects, particularly in the absence of project level detail of future schemes.
Non-technical summary	See above comments.
DRARA (14719717)	
We note the acknowledgement that 'growing levels of motor traffic risk a deterioration in quality of life for many residents, for example due to noise, a less safe walking and cycling environment, and associated impact on community life (Introduction, item 55, p. 37). We would like the council to consider specific commitment to reducing the impact of traffic in residential areas with traffic calming measures and resurfacing of roads with quiet road materials such as those developed in The Netherlands (see for example the report produced by M+P consulting engineers, Netherlands for Working Group Noise EUROCIITIES summarised at http://www.unece.org/fileadmin/DAM/trans/doc/2014/wp29grb/GRB-60-04e.pdf).	Appendix F of the ER already acknowledges the need for quiet road materials, as follows: - <i>The use of low noise surfacing should be considered when delivering new roads, and walking and cycling routes, which would have associated health and well-being benefits.</i>
Environment Agency	
<p>Flood Risk: Sequential Test All new development proposed including transport infrastructure will need to be sequentially tested in order to steer development to land at lowest flood risk. This will need to be done as part of the Local Plan process. If a scheme has not been sequentially tested through the Local Plan it will need to be sequentially tested when it is brought forward for development. We realise that this can be a challenge when dealing with new transport networks but this can form part of any options appraisal, and if proposed would need to demonstrate that it has passed the sequential test.</p> <p>Floodplain compensation: Proposals for new routes within flood risk areas will have to be accompanied by a comprehensive flood risk assessment to show that there is no increase in flood risk for users of the development or to third parties from an increase in flood risk to surrounding areas. Floodplain compensation will need to be provided as part of any scheme within flood risk areas to ensure that the flood risk can be safely managed.</p> <p>Watercourse Crossings We have some standard technical guidance for watercourse crossings which contains standard mitigation measures and bridge structure hierarchy, please see the guidance attached.</p>	Noted. This will be addressed at project stage, in the case of transport schemes.
<p>Biodiversity: Where proposed new transport infrastructure is planned to cross main rivers we advise that the river corridor remains undisturbed so that the wildlife networks are maintained. We would expect proposals to include net gains in biodiversity. Any development affecting a main river would need to ensure that the objectives of the Water Framework Directive can be achieved.</p>	No change to LTP4. These requirements to maintain and improve biodiversity have been included in the final ER.

Query / Comment on the Strategy	Strategy Response
<p>West End Link Road: The West End Link Road, Witney is mentioned in both Policy WIT1 and Policy WIT3 on Witney's strategic networks. We have recently responded to West Oxfordshire's Local Plan consultation in relation to the West End Link Road and we made the following comment: 'There is an opportunity for the link road to provide a dual role in terms of transport and flood risk reduction. The land reserved for the link road is similar to the area investigated for a flood storage area on the River Windrush. This was looked at as part of the Witney Initial Assessment but found to be uneconomic. However the report highlighted that there was an opportunity for a dual role for the link road in terms of flood risk reduction and transport. We would strongly support an approach to deliver the West End Link Road to deliver both reductions in flood risk in addition to transport infrastructure upgrades. We would like the opportunity to work with Oxfordshire County Council and West Oxfordshire District Council to discuss this matter in more detail.' We suggest that this approach should be considered in any future economic, feasibility or viability assessment that is undertaken for the scheme. As mentioned above we would be happy to progress this as a partnership project with yourselves and West Oxfordshire and suggest that the Oxfordshire Local Enterprise Partnership is also involved.</p>	<p>Appendix F of the Area Assessment for Witney now references the need for a West End Link Road at the project level. If seen as a priority by our partners we can consider the viability of, and opportunities for the West End Link Road to provide a dual role in terms of transport and flood risk reduction/flood storage, in consultation with Natural England, West Oxfordshire District Council, the Environment Agency, the Oxfordshire Local Enterprise Partnership and other stakeholders.</p>
<p>Friends of Iffley Village (14709477)</p>	
<p>Iffley is an ancient settlement with many buildings of historic significance that lies adjacent to transport infrastructure between Oxford and Science Vale, near the centre of the 'Knowledge Spine'. This location offers many opportunities, particularly for Iffley's future as a local beauty spot and urban nature reserve, but also risks of overdevelopment, noise, pollution and impaired access to services for local people. Car usage is low in Iffley, due to the high proportion of retired residents, students and young professionals, so we value improvements to public transport and, in particular, cycling and walking routes (Connecting Oxfordshire vol 1 Para 129). We welcome the proposal to create a Cycle Super Route on Iffley Road. The bus services to the city centre are good but the nearest direct bus to the Headington Hospitals is 20 min walk away in Cowley Centre and bus access to the shopping centres on the Ring Road is poor.</p> <p>Oxfordshire LTP4 SEA ER Section 4.6 Biodiversity, Flora & Fauna. Table 4.2 Special Area of Conservation in Oxfordshire omits Iffley Island/Meadows (nearest postcode OX4 4BJ) from the list of 'Oxford Meadows', notwithstanding: 'Iffley Island, also sometimes referred to as Swan Island, is a Site of Special Scientific Interest owned by the Oxford Preservation Trust and managed by the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust to preserve its population of snake's head fritillaries. It is a small triangular flood meadow located on the River Thames near Donnington Bridge in Oxford.' This small but much visited SSSI is near Iffley Lock and thus integral to flood mitigation on the southern side of Oxford (see Section 4.7.3.) The planning of arterial roads between south Oxford and the Science Vale area must take account of its biological, hydrological and amenity value, for example, the proposals to improve the A34 around Hinskey Hill in Connecting Oxfordshire vol 1 Para 70 Fig 19, and those to the Ring Road junctions.</p>	<p>No change to LTP4.</p> <p>We appreciate the importance of Iffley Meadows and Iffley Island SSSIs within the plan area. However, in Table 4.2, we have only listed SSSIs that lie within the Special Areas of Conservation i.e. component SSSIs. We have acknowledged that there are 105 SSSIs within Oxfordshire, which are shown on Figure 4.2 but not all are named individually due to the significant number of sites.</p>
<p>Henley in Transition</p>	
<p><u>Introduction</u> Henley in Transition submitted a response to the LTP4 Consultation last summer where we argued the case for the development of a Henley Transport Strategy. The key points made in that document were as follows: 1. Broad agreement with the thrust of the LTP4 consultation on Goals and Objectives.</p>	<p>No change to LTP4 or SEA ER required.</p>
<p>2. Henley has serious existing problems of traffic congestion and pollution. These will be exacerbated by the planned 450 additional homes in the town as well as additional developments in the surrounding area. (This would include the Science Vale in Oxfordshire as well as significant developments in the adjoining counties of Berkshire and Buckinghamshire)</p>	<p>No change to LTP4</p>
<p>Air Quality: Malcolm Dodds, chairman of Henley in Transition, comments Henley in Transition has joined forces with Watlington Wallingford and SOS (South Oxfordshire Sustainability) to work on our joint concern that action to tackle our poor air quality is not yet being approached with the political priority its effect on peoples' health and lives warrants. We are encouraged by the potential for improvement with the implementation of LTP4 policies and practice, and would welcome an OCC/SODC statement of commitment to jointly establish and apply best practice in tackling air pollution, supported by objectives, time lines and collaborative working arrangements.</p> <p>The House of Commons Environmental Audit Committee Sixth Report of Session 2014 – 15 'Action on Air Quality' was printed in November 2014. It is their third report on air quality in five years. The committee's main recommendations for the government in 2010 and 2011 have not been implemented. The report's summary says ' Meanwhile air pollution continues to be an invisible killer, costing the lives of 29,000 people per year. The UK government has been found guilty of failing to meet EU air quality targets in our cities, some of which will not meet the required limits until 2030. However, meeting EU standards should be the minimum requirement. Regardless of EU rulings, it is unacceptable that UK citizens could have their health seriously impaired over decades before this public health problem is brought under control. It would be helpful to see this language and concern adopted by the public sector in Oxfordshire.</p> <p>The report's summary concludes ' A fresh approach is needed for the health challenge we face, coordinating action by local authorities and communities as well as the government.' Henley in Transition enjoys a good working relationship with SODC and OCC and would welcome the opportunity to work more closely with our local government partners.</p> <p>Air Quality is recognised in the consultation document as an issue in some areas of the county, reflected in the fact that there are 9 Air Quality Management Areas (AQMAs), including Henley. We are pleased to see that you will: 'Continue to work with the Highways Agency, district councils, Network Rail and train operators to identify air quality improvements associated with the road and rail network to complement measures identified in Air Quality Action Plans'. More explicit commitment to action beyond identifying improvements and measures is called for- such as implementing improvements.</p> <p>Improvements to air quality in cities and town centres are likely to be realised through the implementation of measures that deter freight traffic, and consolidate freight items, combining them for onward delivery to the same destination'. Transiting HGVs (those that are not in the town on local business and should be on the Strategic Road Network) are a particular problem in Henley, recognised by the Henley Town Council in their request a year ago for an Environmental Traffic Regulation Order. If nothing is done then this problem is likely to be exacerbated by the growth in the Science Vale to the north-west of the town. Much of the traffic will flow from the Vale towards London and the South-East, passing through Henley on route if nothing is done</p>	<p>LTP4 has policies on freight and a freight strategy that address this. No change to LTP4.</p>

Query / Comment on the Strategy	Strategy Response
<p>Conclusion: We believe that the case for radical solutions to transform transport in Oxfordshire is well made as well as the need for a significant shift away from private car use to public transport, cycling and walking.</p> <p>Connecting Oxfordshire outlines clear policy and strategies for the Knowledge Spine yet there is little or no detail given on strategies for the rural areas of the county, those not included in the Knowledge Spine. Because of the large scale of the developments in the Knowledge Spine there will significant funds available from developers as well as possible infrastructure spending by the government to implement the transport strategy in this part of the county. However, in other areas such as Henley where the level of development is on a smaller scale albeit very significant in terms of the transport constraints, there will be much less funding available. Worse, with further cuts to local authority budgets to come, there is the possibility of bus subsidies being withdrawn. We believe that it is imperative that more detail on a transport strategy for the rural areas of Oxfordshire should be included in the final version of LTP4. In particular, it should be recognised that there is a need for a Henley Transport Strategy to be developed that can address the unique problems of this lovely market town. Without a clear 'direction of travel', Henley will suffer from small scale initiatives that don't begin to address the intractable problems.</p>	<p>For smaller towns, villages and rural areas where there is less growth to impact on transport demand and less of an impact on strategic transport networks, in the spirit of localism we are not planning to develop detailed transport strategies for local communities. Many of these communities are developing Neighbourhood Plans, and we will expect these to set out priorities for transport in keeping with both the policies in the preceding chapters and our freight, cycling, rail and bus strategies published alongside this document.</p> <p>No change to LTP4 or the SEA ER.</p>
<p>Historic England</p>	
<p>Volume 2ii: Area Strategies</p> <p>We have considered the potential historic environment impacts of the various schemes set out in Volume 2ii. Based on the limited information available and our records a number of the proposed schemes would appear to be likely to affect any designated heritage assets, either directly or by virtue of being within the setting of a designated heritage asset. In addition to those identified in the SEA (the new roads and roundabout at Chilton slips, town centre works in Bicester, upgraded roads and junctions in Banbury, the potential link road from Higham Way to Central M40, Banbury and the possible West End link road 2 and upgraded A40/Shores Green roads in Witney), these are:</p> <ul style="list-style-type: none"> • works to the A417, which may affect a grade II listed milestone to the west of West Hagbourne; • the South Abingdon Relief Road, which may affect the grade II listed Thrupp Farm Cottages; • the Bicester South East Perimeter Road, which would be within the setting of the Alchester Roman Site Scheduled Ancient Monument; • the East-West link from the A361 Bloxham Road to White Post Road, Banbury, which is likely to affect the Bodicote Conservation Area; and • the link road from Higham Way to Central M40, Banbury, which is likely to affect the archaeological remains of the former Banbury National Filling Station No.9 on the west side of the M40 which, although not scheduled (unlike the remains on the east side, which are) are regarded by Historic England as being of national significance and which should therefore be considered in the same way as a Scheduled Ancient Monument. <p>However, this is not to say that the other proposals are necessarily unlikely to affect any heritage assets (designated and non-designated), and the Historic Environment Record and the County Council Archaeologist should be consulted on potential archaeological remains as the design of these schemes progress. When further details of a proposed route or works are known, we also would welcome being consulted.</p> <p>We welcome and support the commitment to public realm improvements in Bicester Market Square and The Causeway in Policy BIC2. We welcome and support the principle of Policy BAN1 seeking opportunities to deliver transport schemes which will protect the historically sensitive areas of the town. We welcome and support the commitment to improving the Witney town centre conservation areas in Policy WIT2.</p> <p>Additional comments were provided on Volume 1: Policy Document and Volume 2i: The Oxford Transport Strategy.</p>	<p>We have considered and updated the Area Assessment Report in Appendix F of the ER to reflect the potential for additional impacts on designated heritage assets provided in the response.</p> <p>We have incorporated the need for consultation with the county council archaeologist, Historic England and on the HER on the potential archaeological remains as the design of these schemes progress, within both the Area Assessment Report (Appendix F) and in the main ER text.</p> <p>No change to SEA ER required.</p> <p>With regard to an earlier Historic England comment during the development of the LTP4, it was suggested that Objective 9 in sub-section 3.2 is reworded as "Mitigate the adverse impacts of transport on, and enhance the character and quality of, the local built, historic and natural environment ". Rather than changing the LTP4 objectives, which had previously been consulted and agreed on, the wording in policy 24 and 25 (along with the text before them) reflects the suggested changes.</p>
<p>Strategic Environmental Assessment</p> <p>We note that the Oxford Transport Strategy is assessed as having a minor positive effect in the medium-long term. However, this assessment appears to be rather superficial, particularly having too lightly dismissed the potential significant impact of the locations of the access points to the potential tunnels under the City Centre on the Grandpont Scheduled Ancient Monument or the central Conservation Area or The University Parks/Shotover Registered Historic Park and Garden. The anticipated benefits from improved air quality, visual amenity and reduced vibration need to be weighed more carefully against the potential negative impacts.</p> <p>We are broadly in agreement with the assessments of proposed schemes and identified mitigation measures elsewhere.</p>	<p>No change to LTP4.</p> <p>We have updated text in the ER and the Area Assessment for Oxford in Appendix F to more accurately reflect the likely negative construction impacts of the tunnels on the city centre.</p> <p>No change to SEA ER required.</p>
<p>Headington Transport Group (14418821)</p>	
<p>One feature of the BRT proposals which is relevant to Headington, and has had much publicity, is a possible alternative route for a dedicated BRT track crossing above the Lye Valley from Town Furze to the Churchill site. We flagged up to the Council, at our meeting, the concerns which this would raise about potential harm to a Local Wildlife Site and a nationally-important Site of Special Scientific Interest. In addition we would seek more information on the alternative BRT track from the JR hospital to the ring road via Old Headington/Northway. This would be welcome within the time frame of this consultation.</p> <p>Air quality is a concern, particularly for an area such as Headington with heavy through traffic. A limited degree of monitoring takes place, but more information is needed about particulate matter from diesels close to the main roads, and, if monitoring shows these emissions to be excessive, regulatory measures are needed.</p>	<p>Changes have been made to the maps and text of the draft Oxford Transport Strategy following public consultation to allow more flexibility in the choice of the alternative transit route (removing reference to the Bus Rapid Transits away from the roads). Consequently, the SEA ER continues to state that the impacts of the OTS on SSSIs will need to be considered further at the start of scheme design, but no further detail has been provided with regard to potential impacts on specific SSSIs or LNRs such as the Lye Valley/Cowley Marsh at this stage. We acknowledge the importance of these national and local conservation sites and will ensure that any route alignments that are developed, thoroughly assess the impacts on these sensitive sites and provide suitable mitigation (e.g. avoidance, where appropriate/feasible).</p> <p>Noted request for engagement and information on BRT.</p>

Query / Comment on the Strategy	Strategy Response
Kidlington Development Watch (14797125)	
<p>We do not consider that the case for creating large new Park & Ride sites has been made and we oppose these. The proposed sites at Kidlington (and elsewhere) will be highly damaging to the Oxford Green Belt. Their impact on traffic flows and, therefore, the justification for them, does not appear to be set out.</p> <p>We consider that the County should not support expansion of activities at the airport. This would damage the Green Belt and result in extra road traffic and pressure for further development including supporting services which will also be harmful to the Green Belt. It will also result in additional noise and air pollution in the surrounding area. Air travel is an environmentally damaging form of transport and it would be better to concentrate on improving rail services and connections to the rest of the country.</p>	<p>We shall be undertaking a study into the options for Park & Ride starting later this year</p>
Little Milton Parish Council (14487045)	
<p>The area forming South and East Oxfordshire has a number of major transport issues which should be considered holistically and therefore a specific strategy for the area should be included within Vol 2 Section ii. These include:</p> <ul style="list-style-type: none"> a. The impact of M40 traffic b. The impact of NE/SW journeys through the area, particularly by HGVs c. Bus/coach services from Oxfordshire to London, including the need for adequate parking at Thornhill P & R and at Junction 6 Lewknor d. Watlington – air quality and impact of HGVs e. Henley – air quality and impact of HGVs f. Little Milton – environmental impact of HGVs g. Henley – river crossing h.. Reading – traffic flows to and from <p>With regard to the application of environmental weight limits: In Vol 4 Oxfordshire Freight Strategy para 16 add Little Milton and Wheatley amongst the problem locations. (NB <i>this is the same wording as from South Oxfordshire HGV Group</i>)</p>	<p>We believe that a more effective way for determining transport change in broad areas such as these – that is, those outside of major development zones in the SEP – is to combine mode-specific (for example freight and bus strategies) and route strategies (where relevant) with Neighbourhood Plans and other local representations. This is likely to be more effective in delivering locally-relevant and beneficial change than an area strategy produced for a wide area such as this. No change to LTP4.</p>
Low Carbon South Oxford (14701477)	
<p>Low Carbon South Oxford welcomes the opportunity to comment on the Oxford Transport Strategy. General comments: LSCO is broadly supportive of the analysis, goals and aspirations set out in the OTS.</p> <p>However, the primacy accorded to growth in jobs and the economy, and therefore housing, will be very difficult to combine successfully with serious improvement in the quality of life and the environment, and the transition to a low carbon economy. In the broader context, it is fundamentally important that the location of jobs, homes and services are planned together in an integrated, rational way that is seriously effective in minimizing the need to travel and incorporates travel and transport planning effectively from the outset.</p> <p>It is important to reflect on the successes and failures of earlier local transport plans for Oxford and to learn from these, including identification of the obstacles to successful implementation.</p> <p>As in any plan, it is important to identify the baseline state, to identify at least some key measurable objectives and to have interim review points (preferably light-touch), such as annual reviews, to assess the state of progress and any mitigating measures that may need to be invoked. In identifying the baseline, current problems (congestion, air quality, problems with provision for people walking and cycling) need to be acknowledged and these need to be addressed as well as the additional challenges that come with all the forecast growth in population, jobs, buildings and need for movement.</p> <p>It is noted that many of the components of the strategy are at an outline stage of development. As the detail is developed, we would welcome further public consultation on specific proposals as each is worked up.</p>	<p>No change to LTP4 or SEA ER required.</p>
Natural England	
<p>In our letter dated 03 February 2015, Natural England commented that due to the lack of specific detail on proposed projects in the Local transport Plan (LTP4), we could not provide detailed comment, and awaited further detail. We note that there does not appear to be considerably more detail in this round of consultation, and therefore there we still cannot make much detailed comment at this stage.</p>	<p>LTP4 is a policy-level document for the county as a whole. Detail on individual projects will be produced as schemes and developments are worked up and will be subject to appropriate consultation then, including input from Natural England and other statutory bodies.</p>

Query / Comment on the Strategy	Strategy Response
<p>Draft HRA Screening Report: There is still a high degree of uncertainty and lack of information about the transport schemes included in the LTP4. As a result, there has been insufficient information included in the draft HRA screening to conclude whether there will be a Likely Significant Effect (LSE) on European Sites as a result of the LTP4. We therefore cannot support the conclusion that there will be no LSE and no plan-level Appropriate Assessment (AA), and therefore would question the soundness of this document as it stands.</p> <p>Further consultation comments following liaison in May 2015: I've had a read through the HRA. It's identified that a number of schemes could, without mitigation, have LSE on Oxford Meadows SAC and Little Wittenham SAC. To my mind, the HRA therefore needs to clarify what mitigation will be applied to ensure no LSE from these schemes – and the LTP4 then needs to reflect this in its description of the schemes, given that the purpose of plan-level HRA is to ensure schemes that could have adverse effect on integrity are amended/avoided.</p> <p>So for example with Little Wittenham SAC it needs to explain how scheme location/design/delivery/operation will ensure that the scheme doesn't undermine the achievement of conservation objectives of the features for which the site was designated, i.e. the GCNs.</p> <p>It needs to do the same for Oxford Meadows SAC. Given that it is concluding that without mitigation, LSE from increases in air pollution from road traffic as a result of LTP4 could undermine the achievement of conservation objectives for lowland hay meadows and creeping marshwort, it needs to explain how mitigation will address this to enable its final conclusion of no LSE from LTP4. It says earlier in the HRA that the site is 300m away from the LTP4 proposals, this is outwith the 200m screening buffer used in the Highways England DMRB guidance. I would suggest that at the very least, the HRA works through the initial screening stages recommended by the DMRB – e.g.</p> <p>Are there any designated sites within 200m of roads likely to experience additional traffic as a result of LTP4? No - No further assessment required as the effects of traffic-derived NOx are unlikely to extend beyond 200m of the road edge. Yes – then are those designated interest features which occur within 200m of the road sensitive to NOx or nitrogen deposition? If yes, will LTP4 increase traffic by more than 1,000 AADT? If no, no further assessment is required as an increase of <1,000 AADT is unlikely to result in a PC of > 1% of CL. If yes, a more detailed AQ assessment will be required.</p> <p>This is important given that mitigation measures to address AQ impacts are fairly limited – buffer strips of tree planting can help disperse pollutants, with traffic and/or speed management the only other option.</p> <p>Regarding in combination effects, they only need to move onto assess these if there will be residual/unmitigable effects left after the mitigation to ensure no LSE. The HRA screening report table at 5.2 could more accurately reflect the necessary process if the columns were as follows</p>	<p>The HRA has been updated to reflect NE comments received, and follows the guidance outlined in the DMRB Volume 11. Natural England has confirmed that they concur with the conclusions of the updated HRA.</p>
<p>Oxford Transport Strategy Natural England notes that proposed Bus Rapid Transit (BRT) Route 3 appears to pass in close proximity to Lye Valley Site of Special Scientific Interest (SSSI) along the existing roadway, while the alternative route appears to comprise a new roadway passing in very close proximity to the SSSI. Paragraph 118 of the NPPF states that: 'Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted...' Natural England considers that the proposed route that follows the existing road should be followed, and that the alternative route is not appropriate. We also request to be consulted early on any detailed transport scheme plans regarding potential effects on SSSIs and European sites.</p>	<p>Changes have been made to the maps and text of the draft Oxford Transport Strategy following public consultation to allow more flexibility in the choice of the alternative transit route (removing reference to the Bus Rapid Transits away from the roads).</p> <p>Consequently, the SEA ER continues to state that the impacts of the OTS on SSSIs will need to be considered further at the start of scheme design, but no further detail has been provided with regard to potential impacts on specific SSSIs or LNRs such as the Lye Valley/Cowley Marsh at this stage. We acknowledge the importance of these national and local conservation sites and will ensure that any route alignments that are developed, thoroughly assess the impacts on these sensitive sites and provide suitable mitigation (e.g. avoidance, where appropriate).</p> <p>Natural England will be consulted on the development and acceptability of transport schemes including those that have potential to affect international and national conservation sites.</p>
<p>Strategic Environmental Assessment (Environmental Report) The Strategic Environmental Assessment (SEA) identifies appropriate objectives, sub-objectives and assessment criteria regarding 'Air Quality', 'Biodiversity, Flora, Fauna', 'Water, Geology, Soil' and 'Landscapes'. Using these criteria, the SEA for the LTP4, Area strategies, and policies frequently conclude adverse or unknown effects on air quality, water, soils, biodiversity, and landscape as a result of carrying out the plan. Paragraph 109 of the NPPF states (amongst other things) that: The planning system should contribute to and enhance the natural and local environment by: <input type="checkbox"/> Protecting and enhancing valued landscapes, geological conservation interests and soils; <input type="checkbox"/> Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity... Therefore, Natural England requests to be consulted early on any detailed transport scheme plans in order to help achieve these objectives.</p>	<p>No change to LTP4 or SEA ER required.</p> <p>Early consultation with Natural England will be required during the development of individual transport schemes.</p>
<p>Oxford Green Belt Network (14665829)</p>	
<p>I think the main Green Belt issue is the proposal to scrap the existing park and ride facilities and replace them with ones a bit further out in the Green Belt. We have always argued that new park and ride facilities should be beyond the Green Belt and it seems to me that this proposal would continue to draw commuter traffic to the edge of Oxford, so a retrograde plan. It appears to be based on an acceptance of the assumptions behind the SEP and the SHMA that there will be a Greater Oxford and no doubt the land freed up by eliminating the present park and ride facilities would just be absorbed into the urbanised area.</p>	<p>We shall be undertaking a study into the options for Park & Ride starting later this year</p>
<p>Oxford Preservation Trust</p>	

Query / Comment on the Strategy	Strategy Response
<p>OPT is a charity which has as one of its main objectives, the protection and enhancement of Oxford's green setting. In order to do this, it owns and manages some 800 acres of land, within that setting, both Green Belt and other, and has done so for over 80 years. Oxfordshire County Council was at the forefront of traffic management in the 1970's with the first Park & Rides in Britain and continued this with its brave move to remove cars from parts of the centre of the city in the 1990's both in recognition of the difficulties that Oxford brings in managing access and traffic issues. These difficulties do not go away and LTP4 gives some extraordinary growth predictions, which we are not in a position to question, and states that growth on the kind of scale envisaged needs a transport strategy of the same magnitude. We are delighted to see the County Council taking this far reaching approach to the problems of traffic in 2015–2031.</p>	<p>No change to LTP4 or SEA ER required.</p>
<p>Whilst we may not be in a position to dispute the figures predicted, and recognise that this may be outside the scope of this Study, we must nevertheless record that OPT has very major concerns over the level of growth proposed for Oxford and Oxfordshire as a whole. We note that the laudable intention of the Study that the transport proposals will not to 'significantly compromise the character of Oxford', but simply cannot see how this will be the case if we do have to accommodate such high levels of growth.</p> <p>OPT has never sought to stop development but aims to guide it. We are fully aware of the need for the City and County to continue to develop and flourish, but such development must be at a level that is sustainable, and which preserves and enhances Oxford's character. It is our view that the levels of development and the transport implications, if they are significantly implemented, will cause damage to the setting of Oxford and harm the character of this world class city. We understand the reasons for the vision for rail, rapid bus transit and buses/coaches.</p>	<p>No change to LTP4</p>
<p>With regard to increased use of rail travel we recognise the unprecedented move towards rail travel and support the opening up of previous lines and encouraging more local use. The environmental impact of the electrification of the railway on the green setting of the city should not be underestimated as the railway runs along the western side of the City between the dreaming spires and the western hills made famous by Matthew Arnold and JMW Turner. We draw attention to the Oxford Views Study which is to be published in May in partnership with Oxford City Council, OPT and English Heritage. Thought should be given to the rail industry being called upon to design gantries which will minimise their impact when seen across such areas as the Schedule Ancient Monument of Port Meadow the subject of considerable recent controversy over a University development. In addition reference is made in the Oxford Transport Strategy Pane 10 to the Oxford Station Masterplan with bullet point stating that 'complimentary development to help fund the improvements ...' The Station occupies a sensitive position within the Oxford views from the west and again we draw attention to the Views Study and the need for very careful consideration over the height and design of the roofscapes of any buildings on this and adjoining sites if they are to contribute rather than to harm these views.</p>	<p>No change to LTP4.</p> <p>Thank you for drawing our attention to the Oxford Views Study, which has now been referenced in the SEA ER.</p> <p>Care will be required during the development of individual transport schemes to avoid harm to the views of Oxford that are considered of considerable heritage value.</p>
<p>We recognise the need to concentrate on buses in the city centre and are interested to learn of the Bus Rapid Transit. We are concerned that this scheme must be sustainable without the need for the tunnels under the City. It seems extremely unlikely that these can be achieved either in infrastructure/planning/heritage terms or because of the sheer cost when we are such a small City moving small(ish) numbers of people about.</p>	<p>No change to LTP4</p>
<p>We are fully supportive of the aim to fully integrate public realm enhancement into the transport changes. We are mindful that this did not happen as part of the OTS scheme in the 1990's so that areas, such as Broad Street were closed to traffic at the western end but with no, or very limited improvements made to the spaces created as a result, and certainly not of the standard expected of a world class City streetscape. We hope that the opportunities created by the opening up of the Weston Library at the eastern end Broad Street, which encapsulates the principles found in the Broad Street Plan (2004) which was endorsed by the County Council at the time (see also Oxford Times 02 April 2015) will be included in any future plans.</p> <p>We note that the suggestion is that current Park & Ride sites on the edge of the City will be relinquished and replaced with sites further from the city centre. Whilst we understand the principles behind this, we point out that on Page 14 'the closure of the Park & Ride car parks at Water Eaton, Peartree, Seacourt and Redbridge presents the opportunity for redevelopment' may not be correct. At the Planning Inquiries relating to the Park & Ride sites, particularly at Water Eaton, and the extension to Redbridge, it is our recollection that it was agreed that should the sites no longer be needed for a Park & Ride, they would be returned to their previous purpose and would be redesignated as Green Belt. These would not, therefore, be 'brownfield' sites as might be assumed, but instead Green Belt and protected from development.</p> <p>As a major stakeholder, both as landowners within Oxford's green setting and through our involvement in such schemes as the Oxford Views Study and the Broad Street Plan we would hope that there would be considerably more dialogue going forward on future traffic plans/public realm improvements for the city. We would hope that this would be as part of the drawing up of any plans and not merely as a consultee, as has been the case this time.</p>	<p>We shall be undertaking a study into the options for Park & Ride starting later this year</p>
<p>Oxfordshire Cycling Network (14630245)</p>	
<p>Volume 5 (Strategic Environmental Assessment)</p> <p>To what extent do you agree or disagree with this section? Strongly Disagree. The SEA sets a Baseline that the environment will get significantly worse due to growth and climate change. LTP4 is judged to be better than this Baseline, so it passes the assessment. This is a very poor approach that institutionalises a worsening environment and the negative impacts that it has on health and quality of life.</p> <p>By using a Baseline that is worse than the current situation, the SEA does not respond to the relevant Goal, which is to 'Protect and where possible enhance Oxfordshire's environment and improve quality of health'.</p> <p>As an example: "In the longer term, there may be increasing risks to cyclists and pedestrians from the estimated increase in large lorries, but these risks will increase at a greater rate in the absence of the LTP4." By accepting this approach, the Council is endorsing that greater risks to cyclists and pedestrians are inevitable. OCN objects strongly to this approach, and urges that an assessment of environmental and health impacts relative to the current situation is conducted, responding to the agreed Goal.</p>	<p>The SEA Regulations require consideration of future trends (i.e. are trends suggesting that the existing situation is getting better or worse?) and require assessment of 'no plan or programme' (i.e. evolution of the baseline in the absence of a plan with consideration that baselines will change over time under 'no plan').</p>
<p>South Oxfordshire HGV Group (14292293)</p>	
<p>With regard to the application of environmental weight limits: In Vol 4 Oxfordshire Freight Strategy para 16 add Little Milton and Wheatley amongst the problem locations.</p>	<p>Mention of specific locations in the freight strategy does not preclude the possibility of weight limits being implemented in other locations in the county in the future.</p> <p>The examples given were not intended to be a comprehensive list, but were used for illustrative purposes.</p>
<p>SPADE (14750885)</p>	

Query / Comment on the Strategy	Strategy Response
<ul style="list-style-type: none"> We believe in the permanence of the Green Belt We understand that there is a need for more housing (especially affordable housing) but believe that brown field sites should be used for development before Green Field sites We believe that local people should have a true voice in establishing planning policy <p>We are very concerned that the OCC LPT process has been undemocratic because it has been little publicised and local people are largely unaware of it and the enormous negative implications it potentially has for them and their communities. The woefully inadequate consultation (i.e. none) between the OCC and the local district and parish councils leads us to question the validity of the plan, especially as we understand there is no further consultation or examination in public of the Plan, despite the enormity of its proposals. In summary, we believe that considerable further review of the Connecting Oxfordshire Local Transport Plan is still required, followed by further public consultation, and preferably submission of the plan to independent scrutiny.</p>	<p>OCC has undertaken a comprehensive process of consultation on LTP4. The second stage of consultation in particular was widely advertised through the media, through social media and via the Council website, while a number of public meetings and/or presentations took place in each district and with various stakeholder groups. Consultees were given eight weeks to respond, which we believe is a sufficient amount of time.</p>
<p>Sunningwell Parish Council</p>	
<p>The Sunningwell Parish Council (SPC) maintains that the current consultation period is too short and should be extended. The quantum of material contained in the Oxford County Council Local Transport Plan Consultation 2015 (OCC LTP 2015) and the requirement to review other relevant documentation (e.g. The Vale's Local Plan and the Highways Agency recently published Solent to Midlands Route Based Strategy), and the timing of the Easter vacation means that additional time is needed to organise the dissemination of information to residents of Parishes affected by these proposals.</p> <p>The Oxfordshire County Council website states that it "believes it is very important that people have a say ... and that Consultation helps us to stay in touch with what our customers need and want. This is especially important when we need to make difficult decisions that affect the people of Oxfordshire". We endorse this approach especially, when the decisions are not just difficult they are of a permanent nature. In this case OCC have not followed their own guidelines. Insufficient time for adequate consultation has been given. Furthermore the OCC LTP refers only superficially to important detail that is dealt with by supporting reports. This demonstrates "a lack of open and honest consultation" with the electorate. Furthermore the Plan is based on the Local Enterprise Partnership Strategic Economic Plan which has not had any independent scrutiny or engaged local democratic participation. Based on our own efforts, it has become clear that, no material consultation has taken place with the Vale of White Horse District Council or the resident populations of Abingdon and other surrounding villages regarding the implications of the OCC LTP.</p> <p>SPC recognising the gravitas of these proposals held a local drop -in event on 29 March 2015, in the village hall to discuss these plans with residents. The SPC's response to the OCC LTP 2015 is set out below and has the mandate of our electorate, it includes specific reference to the impact it may have upon the Parish:</p>	<p>OCC has undertaken a comprehensive process of consultation on LTP4. The second stage of consultation in particular was widely advertised through the media, through social media and via the Council website, while public meetings and/or presentations took place in each district and also with various stakeholder groups. Consultees were given eight weeks to respond, which we believe is a sufficient amount of time.</p>
<p>Green Belt</p> <p>1 The OCC LTP completely disregards the status of land designated as GREEN BELT (GB). GB status is designed to protect land from being developed. The OCC LTP Volume 1 (Overall Policy) - Supporting Growth and Economic Vitality fails to delineate between GB and non GB land.</p> <p>2. Relocating the Redbridge Park and Ride (P&R) and siting a replacement at Lodge Hill (LH) would be a serious breach of the existing Green Belt (GB). Furthermore the OCC LTP diagrams of potential P&R sites illustrate the "broad location" for a P&R on a site to the West of the A34. No case has been made for a P&R to be "permitted" development. Such a location is very close to the proximity of the village of Sunningwell which has "washed over" status and should be protected from any future developments in its immediate vicinity.</p> <p>3. Already, the Vale of White Horse's Local Plan with a "planned" 1,000 houses at North Abingdon is already attempting to redefine the GB by proposing building beyond the current boundary of the Abingdon ring road. The GB must be protected from piecemeal encroachment as accorded by the National Planning Policy Framework.</p> <p>4. SPC is in agreement with OGBN who have already advised OCC that any relocation of P&R facilities should be located outside of the GB—with suggested locations for a Redbridge replacement to be located at Marcham, or Milton, Didcot.</p> <p>5. OCC LTP Vol 2 (Oxford Transport Strategy)- Mass Transit provides no evidence that the "broad locations" identified for P&R sites e.g. at Lodge Hill (LH) are the correct locations for P&R as part of the Mass Transport strategy.</p> <p>6. Furthermore, neither Marcham nor Milton have been considered as alternative locations to LH for P&R /Lorry park facilities. Both have good access directly on to the A34.</p> <p>a. Recognising that Marcham Road is the current GB boundary, land exists to the South of this road which is not GB and could facilitate a P&R/Lorry Park. Whilst this is an area that has flooded twice in the past 100 years, flood defence or management could be undertaken to ensure its suitability. This site has the attraction of being in the close vicinity of the VOSA weigh-bridge.</p> <p>b. Milton at Didcot is not in the GB.</p> <p>c. Each has a substantial population catchment area and siting P&R facilities at either location would avoid people driving to LH. OCC's Rapid Bus Transit routes could commence from further outside Oxford.</p> <p>7. The OCC LTP in Vol1 (overall Policy)- Improving Quality of Life refers to improving living conditions and the environment for Oxford residents. A laudable goal. However, those same proposals completely ignore the environmental impact the relocation of the P&R will have on neighbouring villages across the Oxfordshire GB. The enjoyment of the GB is not the sole preserve of those who live in it, but also for the enjoyment of the wider community—e.g. City residents wishing to access open green spaces.</p> <p>8. The OCC LTP fails in its own Strategic Environmental Assessment (Volume 5) to recognise that there will be any environmental impacts ensuing from its policies. It fails to assess the impact of relocating P&R's and creating Lorry parks in the GB—increases in traffic flow, air pollution, noise pollution and light pollution. It also fails to provide any evidence of the sustainability of its proposals. As far as the SPC is concerned there is no justification for locating a P&R and/or Lorry park at LH. Commuters into Oxford coming from outlying communities will still need to drive to LH. Such a move will only lead to increased congestion on the Oxford Road in Abingdon and on the A34. In addition it has the potential to create significant "rat running" through the villages in Sunningwell Parish, on roads that are totally unfit for any increase in traffic flow caused by the double magnet of access to the South facing slip roads and the Park and Ride.</p>	<p>We shall be undertaking a study into the options for Park & Ride starting later this year.</p>

Query / Comment on the Strategy	Strategy Response
<p>Housing</p> <p>1. In 2014 a Strategic Housing Market assessment (SHMa) was undertaken to understand how many new homes OCC felt it needed to provide in Oxfordshire. The SHMa looked at both the expected growth in population and at the anticipated economic growth between 2011 and 2031. Based on these, it recommended the amount of housing we should be planning for (known as the 'Objectively assessed need' or Oan. However none of the SHMa's figures have been verified. The SHMa was not open to consultation and is considered to have used inflated housing numbers in order to obtain developer funding.</p> <p>2. The Housing Developer contribution of £4m (identified in the Vale of White Horse DC Local Plan) towards the cost of the Diamond Junction at LH has been obtained as a direct result of the "planned" 1,000 houses at North Abingdon- a number so far unsubstantiated by any economic forecasts.</p> <p>3. Indeed the SHMa numbers have been heavily criticised and West Oxfordshire District Council has published two reports in 2014/2015 assessing housing needs at much lower levels than that forecast by SHMa. OCC's own LTP acknowledges that SHMa's forecast are based on policy-led economic growth ambitions.</p> <p>4. Future SHMa forecasts of population projections to 2052 that vary between 723,000 and 1.15 million remain unprecipitated. Cause for concern is that these numbers are being used to help develop both Vale housing allocations and the OCC transport policy.</p> <p>The case for building the houses already "planned" in the GB at north Abingdon and across Oxfordshire as a whole is flawed and not adequately evidenced, let alone the premise for P&R/Lorry facilities that would appear to piggy-back on the creation of a diamond junction at LH.</p>	<p>No change to LTP4</p>
<p>Diamond Junction</p> <p>1. It is clear that the case for constructing a Diamond Junction at Lodge Hill has not been proven or quantified.</p> <p>2. The County Council Local Transport Plan (2011-2030) rejected the building of such a junction due to opposition from the Highways Agency (now Highways England) and the lack of compelling evidence that the construction of south facing slips would reduce traffic congestion in Abingdon. However it is noted that its new report 2016-2031 supports the diamond junction, but does so without providing any updated evidence as to its viability. This gives cause for concern.</p> <p>3. Traffic on the Abingdon Ring Road is already at capacity, particularly at peak travel times. The OCC LTP coupled with the Vale of White Horses Housing Plan to add an additional 1,000 houses at North Abingdon can only lead to a worsening of this situation.</p> <p>4. Currently the south off slip exiting the A34 at Lodge Hill is already congested with traffic at peak times, often backing up at Lodge Hill onto the A34 slip road. A diamond junction coupled with the location of a P&R and the potential for a Lorry Facility would aggravate this position. Without the diamond junction neither the P&R nor a Lorry facility would be viable as easy access to the A34 would not exist.</p> <p>It would appear that the OCC is intent on pushing traffic congestion outside Oxford City to the villages immediately surrounding it, in designated GB. The OCC LTP supports the building of a diamond junction, tied by developer money to the building of houses in North Abingdon (if a P&R is permitted at LH, a lorry park might also be built with easy access on/off the A34).</p> <p>However this approach fails to deal with the core transport problem both at City level and County. The A34 itself cannot cope with EXISTING levels of freight traffic using the A34 to get to/from the M40/M4, nor, can the A34 cope with local traffic wishing to access the City. One possible solution would be to widen the A34 or to use traffic demand management measures to control the speed and flow of traffic, thus increasing capacity within the existing infrastructure. Also improving rail services and the frequency and speed of transit of buses into Oxford could reduce demand on the A34. Pushing the traffic congestion, air pollution, noise pollution and light pollution into local villages, whilst not addressing the underlying problem of the A34's capacity is not a viable long term solution.</p>	<p>The County Council have now undertaken modelling based on future housing and employment numbers proposed for the area, which includes Science Vale and Oxford, as well as that for Abingdon itself. This modelling demonstrates the increased pressure on Abingdon's local roads with the increase in trips and the subsequent improvement if A34 traffic is permitted to access from all directions at Lodge Hill. Further evidence to this effect will be available at the EIP. Modelling and subsequent discussions with Highways England (HE) also show that this proposal is in principle acceptable to HE as the online flow on the A34 is not significantly impacted.</p> <p>The Evidence of Transport Impact report on the Vale of White Horse Local Plan proposals (which is available on their website) sets out the strategic need for new infrastructure including the Lodge Hill interchange, as part of a package of measures to deal with the increase in trips from the growth in housing and employment in the area.</p>

Query / Comment on the Strategy	Strategy Response
<p>Park & Ride and Lorry Park/Lorry Facilities</p> <p>1. LH is an unsuitable location for a P&R. LH is in the GB and no case has been made for a P&R to be “permitted” development. No evidence of sustainability has been provided, contrary to the requirements in the NPPF relating to development in GB.</p> <p>2. Secondly the infrastructure of rural roads surrounding Lodge Hill, servicing the villages of Sunningwell and Bayworth (the villages most likely to be immediately affected) are narrow and unsuitable for any increase in traffic volumes caused by commuters “rat running” to access the P&R from the west.</p> <p>3. Additionally, the location of a Lorry Park/Facilities adjacent to a P&R at LH is not and should not be considered to be “permitted” development in the GB. No case study has been undertaken to justify LH as an appropriate location for a Lorry Park/Facility.</p> <p>4. Land adjacent to the existing Redbridge P&R does not appear to have been considered for its expansion. Oxford City Council (OxCC) is on record stating that it has no intention of shutting the Redbridge P&R and is considering expansion of some of its P&R sites</p> <p>5. Currently freight weigh-bridge facilities already exist at Marcham. Easy access on/off the A34 is available here, service station/restaurant facilities currently exist with land nearby that could be considered for a P&R and /or Lorry Park facilities. This location could be suitable for a P&R as the population of Abingdon and Didcot would drive to a locations outside of the GB, but near to Oxford and link up with the Rapid Bus transit system proposed in OCC’s LTP into Oxford. This would free up traffic on the Abingdon Ring Road and on LH, making the bus route more “rapid” along the proposed Oxford Road route. The OCC LTP report does not even consider Marcham as a location.</p> <p>6. Alternatively, both a P&R/Lorry Park could be located out at Milton, Didcot where existing road/ fuel service station/and population density (Didcot) also exist to merit its consideration. The OCC LTP report does not give consideration to the Milton location, which is also outside the GB. Current and future Abingdon residents would use improved local bus services that could link with buses using the Rapid Bus Transit routes.</p> <p>7. The OCC LTP Transport Strategy has not considered or evaluated separating the siting of Lorry parks away from P&R’s. The OCC LTP Initial Consultation with the Road Haulage Association (RHA) and the Freight Transport Association (FTA) on 4 June 2014 records a general enquiry about the potential of using existing P&R facilities as rest sites for their drivers, because of concerns with safety and the frequency of fuel thefts arising at Oxford Services. P&R users need to be confident in their personal and property safety for a P&R scheme to be successful. This we believe is best achieved by having separate facilities for P&R sites and Lorry Parks.</p> <p>8. The OCC has proposed the remote P&R strategy as a core principle of the LTP, without comprehensively consulting with OxCC. Failure of the OCC and OxCC to cooperate in formulating a cohesive integrated transport strategy has led to a lack of assessment taking place when considering the locations for P&R and Lorry park/facilities - at least 5 of the 6 “new “ P&R sites proposed are to be located in the soft target locations of the GB.</p> <p>9. Flooding arising from a P&R/Lorry Park facility at LH is also of concern. The sheer scale of the proposed P&R (1,600 cars) plus the potential acreage for a lorry park covering hectares of agricultural land poses a potential flooding hazard, due to increased rainwater run-off. The village of Sunningwell and Bayworth are already threatened by flooding as they lie at the bottom of the junctions of Boars Hill (Lincombe Lane), Bayworth Hill and the Unnamed road/Pen Lane hill. Flooding was only narrowly diverted in 2014.</p> <p>8.The OCC LTP report claims to change the focus of commuter traffic entering Oxford towards the usage of Rapid bus transit routes and cycling, thus easing congestion in and around Oxford and improving environmental conditions for it’s residents and workers. In so doing, it fails to take account of the environmental impact that building a 1600 space P&R in the GB at LH and possibly a Lorry Park, will have in neighbouring vicinities: Noise pollution, Light pollution, Air pollution, potential Flooding risk, with increased traffic congestion local to Abingdon, Sunningwell, Bayworth, Boars Hill (Foxcombe Road). Individual Local Authorities appear to be concerned only about their own ability for job creation, population growth and environmental improvements having scant regard for anyone else.</p> <p>9. Whilst the RHA and FTA speculated in June 14 about the potential use of the existing P&R sites on the Oxford Ring Road. They did not specifically support facilities south of Oxford on the A34, as implied in Paragraph 14 of Volume 4 Freight Strategy at LH, as a site for a Lorry facility. This is only feasible if easy on off access to the A34 exists and so is tied in with the building of a diamond junction. It is suggested that better non GB alternatives exist either at Marcham or Didcot. Each of which would be deliverable earlier and facilitate OCC’s desire for speedier access into Oxford by not increasing congestion on LH (Oxford Road) approach into Oxford.</p>	<p>The possibility of locating a P&R at Lodge Hill are part of the longer term possibilities to support increased numbers travelling to Oxford. This option will be assessed in more detail as well as considering alternative locations as suggested.</p> <p>Provision of an HGV park is designed to provide better facilities for those travelling on the A34, and reduce the impact of HGVs using the currently substandard laybys (congestion and safety risk). Similarly alternative locations will be considered for this.</p>
<p>Conclusion</p> <p>The OCC LTP seems to do anything but “Connect Oxfordshire”. If anything it seems to set the requirements of Oxford City Council and its residents over and above those of the surrounding communities. It could be construed as divisive.</p> <p>Sustainable business growth, increased housing supply and good road/rail infrastructures are benefits that should be spread across Oxfordshire. The current OCC LTP vision is too focused on the City. It recognises the need to develop a Science Vale stretching from Didcot up to Bicester, but fails to address the fundamental issue of traffic congestion on the A34 that would underpin such growth. Dealing only with proposals to load local City congestion onto villages in its immediate vicinity, who are already facing similar problems of their own—it is hardly integrated, business focused nor, long term.</p> <p>Finally, the Green Belt was created for a reason and must be protected. If not now...when? Each incremental incursion into the GB ratchets up pressure on our environment and destroys it for future generations. Do we only stop when everywhere is urbanised? Destruction of the GB should be halted and the Park and Ride at Lodge Hill, as with other P&R GB locations re-sited.</p> <p>SPC is willing to actively engage with OCC and any other body involved with the OCC LTP proposals. SPC will be available and interested in any follow up consultations on the LTP, including specifically the remote P&R strategy. Contact details are below.</p>	<p>No change to LTP4</p>
<p>Watlington Parish Council (14792773)</p>	
<p>Strategic Environmental Assessment: This appears to be using a different set of policies from those given in the Overview report. For example it claims that Policy 11 on developing air travel and Policy 17 on highway maintenance activity will have a major positive contribution on reducing greenhouse gas production. This needs to be rewritten before it is worth reviewing.</p>	<p>The policy numbers in the various SEA documents have been revisited following changes to the LTP4 main volumes. All documents are now consistent, and the impacts are appropriately aligned to the relevant policies.</p>
<p>Summary of Consultation Responses from Members of the Public (including councillors)</p>	

Query / Comment on the Strategy	Strategy Response
<p>Appendix C: Health Impact Assessment We believe that insufficient weighting has been given to issues arising from the strategic environmental assessment: Appendix C - effects on human health. Specifically, the following issues require further consideration and/or resolution.</p> <ol style="list-style-type: none"> 1. We note (p3-1) that the Association for Directors of Public Health recommends that 10% of transport budgets is committed to walking and cycling. We cannot find evidence in the proposals to show that this notional figure will be met by projects set out in the OTS. 2. Section 2.4 refers to the need for a road safety strategy within and beyond the county. There is also reference to the need for programmes of safety measures within the plan. The science transit strategy in section 3.7 suggests that technology and data innovation should be embraced, and we suggest that this should be extended to unlocking accident and near miss data too. 3. Accident numbers at junctions have been highlighted, and we support further research on the most effective way to mitigate accidents and near misses particularly at junctions of "A" roads with residential roads in Oxford City. We believe that a transport safety advice team should be allocated a budget within LTP4 to research best practice and give advice and sign off to project managers on road safety-related matters. 4. We believe that insufficient weight has been given to the reduction of emissions, particularly in areas where there is a higher proportion of elderly residents and congestion is high, and that improvements in air quality should have a higher policy priority. (Section 2.9 Effect on the elderly). Overall air quality targets should meet those set out in district council air quality plans. 5. Promotion of urban tree planting to improve air quality should be a key objective rather than something that may be addressed at project level. We suggest that the County identifies the species of trees that are suitable in urban areas across the city where congestion is worst. 	<p>The HIA (Appendix C of the SEA ER) has been updated following public consultation, and provides due consideration of the impacts of traffic and air pollution on human health.</p> <p>Oxfordshire County Council states that its ambition within the lifetime of this Plan is to take cycling from its current levels (of around 3% of all trips) to 10% of all journeys across Oxfordshire. We are not required and nor are we able to commit a specific proportion of our budget to promoting a specific mode or modes of transport.</p> <p>We currently have a team responsible for undertaking road safety audits and fulfilling our legal responsibilities for road safety. We do not have any budget to enable the team to research best practice.</p> <p>When an area is declared an Air Quality Management Area (AQMA) because of exceeding levels of particular pollutants, the district or city council is required to develop an Air Quality Action Plan (AQAP). As transport contributes most of the problem pollution (in Oxfordshire this is currently NOx in all cases), many of the potential actions are only possible with the support of the County Council. We recognise our responsibility and will work with the district and city councils to develop appropriate actions, taking into account our overall transport strategy.</p>
<p>Concerns regarding air emissions, traffic and human health – understated negative and adverse effects of facilitating traffic expansion and failure to take account of medical scientific understanding of traffic effects.</p>	<p>The HIA (Appendix C of the SEA ER) has been updated following public consultation, and provides due consideration of the impacts of traffic and air pollution on human health.</p>
<p>Concerns regarding proposals to site large park and ride car parks in the Oxford green belt e.g. at Cumnor.</p>	<p>We shall be undertaking a study into the options for Park & Ride starting later this year (2015).</p>
<p>Concerns regarding proposals for rapid transit buses and bus tunnels in Oxford with no consideration of technology (cut and cover/bored), scale (bus tunnels would be much bigger than metro/small tram tunnels), finance and environmental impact (huge construction impacts on archaeology, vibrations and settlement risk for major heritage buildings or the intrusion of tunnel portals (and access structures) at locations that would clearly affect major Grade I listed buildings).</p>	<p>Any such projects would go through a detailed development and consultation process, including detailed feasibility studies and option assessment.</p> <p>The Area Assessment for Oxford Transport Strategy (Appendix F of the SEA ER) has been updated to reflect the likely construction impacts of the tunnel proposals on the environment – see below: -</p> <p><i>'... there are likely to be some negative impacts upon the historic environment from the improvements to the transport network (in particular tunnel construction) and the re-routing of traffic during construction, which may outweigh the longer-term improvements to air quality and reduced vibration. Such impacts have the potential to affect the late saxon and medieval historic core of Oxford, which is considered a nationally important heritage asset. Other impacts may include negatively affecting the setting of Blenheim Palace World Heritage Site, and significantly affecting listed buildings, scheduled monuments (e.g. the Norman Grandpont Causeway located below the modern road at the indicative access point at the southern end of St Giles-St Aldates tunnel), the character of Conservation Areas and The University Parks/Shotover Registered Park and Garden in Oxford city centre and surroundings, which will require further consideration at project level. There is also potential for severe damage to below ground archaeological remains and possibly for damage to listed buildings from vibrations during tunnelling operations.'</i></p>
<p>No plans or strategy within the LTP4 to deal with the problem of HGV traffic passing directly through Chipping Norton.</p>	<p>This is addressed within the Freight Strategy.</p>
<p>Limited reference to traffic concerns in Henley within the LTP4.</p>	<p>For smaller towns, villages and rural areas where there is less growth to impact on transport demand and less of an impact on strategic transport networks, in the spirit of localism we are not planning to develop detailed transport strategies for local communities. Many of these communities are developing Neighbourhood Plans, and we will expect these to set out priorities for transport in keeping with both the policies in the preceding chapters and our freight, cycling, rail and bus strategies published alongside this document.</p>
<p>Need to invest much more in climate change mitigation measures and the restoration of biodiversity along all transport routes. Concerns relating to animals killed by cars on the roads</p>	<p>Opportunities to improve biodiversity are outlined in the SEA ER (Section 6.3.7). The increasing risk of animal deaths by traffic is now reflected in the SEA ER.</p>

Query / Comment on the Strategy	Strategy Response
Environmental Impacts of airport expansion on Port Meadow Sac not fully considered.	Impacts of the LTP4 on the relevant SACs (including Oxford Meadows SAC, for which Port Meadows SSSI is a component feature) have been considered in the HRA Screening Report (Appendix D of the SEA ER); the conclusions of which have been agreed with Natural England.
1.6.2 Cumulative Impacts: ADD: Ensure cycle route improvements are completed promptly so that we have the best chance of achieving modal shift within the timescales envisaged.	This comment has been reflected in Section 6.3.13.1 of the SEA ER.
<p>The SEA Objective to Enhance and protect the green infrastructure and countryside (which claims that "No significant strategic impacts on the countryside and green infrastructure") is inaccurate in respect of:-</p> <ul style="list-style-type: none"> o Location of 5 or more of the newly proposed Park and Ride Sites as they are all in designated Green Belt. o The proposal of the A34 to M40 link road "south of Oxford" which would be almost entirely constructed in Green Belt <p>• To demonstrate the ongoing OCC commitment to the Green Belt, either SEA Objective 3 should be reworded to incorporate a specific reference to Green Belt or preferably, an entirely separate Objective should be created providing for its maintenance and improvement</p>	<p>The SEA objectives have been developed to appraise high level policies, Area Strategies and the Supporting Strategies. The Area Assessment in Appendix F of the SEA ER provides the environmental assessment, which indicates whether components of the LTP4 can partially or fully meet these objectives or not. Where there is difficulty in achieving some of the environmental objectives, recommendations for further work or mitigation measures (to avoid or reduce the impacts) are summarised.</p> <p>As the SEA objectives were developed at the scoping stage of the LTP4 (and were consulted on with key organisations including statutory consultees at that stage), it is not considered appropriate to change them. However, it should be noted that the Green Belt is considered to form part of Objective 3. Enhance and protect the green infrastructure and countryside, and this has been included as one of the assessment criteria.</p>
SEA needs to consider the impacts and effects on farms and agriculture	At this strategic level, it is not considered appropriate to consider individual farms or properties. However, further consideration has been given to the effects of the strategy on agriculture (see Sections 4.8 and Section 6.3.9).