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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Oxfordshire Plan 2050 - SA Scoping Report Consultation - CPRE Oxfordshire response, February 2019

- 1. Is the scope of the SA appropriate as set out considering the role of the Oxfordshire Plan 2050 (JSSP) to help meet and manage Oxfordshire's growth needs and development ambition?*

No.

CPRE Oxfordshire believes, in line with Defra 25 Year Plan, we need a real vision for environmental improvement, not mere tinkering with the effects of development driven ahead by a quest for economic growth at any cost.

There is a failure to acknowledge or discuss in any detail the ambitious growth proposals underlying the Oxfordshire Plan 2050, and the fact that to a certain extent it is a self-justifying proposal - in other words the Plan needs to exist to mitigate its own effects.

The Scoping Document should be revised to include:

- 1. A vision that reflects a strong ambition not just for environmental protection, but also environmental improvement.**
- 2. Meaningful information about current trends and rates of change, not just static information (an approach far more closely aligned with what the SEA regulations require).**
- 3. Appropriate analysis of the interactions between different SEA environmental topics and the indirect and cumulative issues arising.**
- 4. Clarity on the context in which objectives are being assessed - where does the Oxfordshire Plan 2050 sit in relation to other projects that may be 'imposed' (such as the Ox-Cam expressway) and whose needs take priority (existing v future Oxfordshire residents? Oxfordshire needs v needs of UK as a whole?)**

Pre-existing local and strategic plans severely restrict the ability of the SA/SEA to ensure that the different effects on the environment of different options can be positively considered in drawing up options.

The Oxfordshire Plan 2050 is being drawn up reflecting and implementing local, minerals, waste and transport plans that are already adopted or well advanced, together with a Strategic Economic Plan that has not been subject either to SEA or public examination.

In terms of alternative approaches to development, this means the Oxfordshire Plan 2050 is highly constrained and for the first 15-20 years is not proactively shaping development planning. It also means that the baseline conditions that prevail from which it starts to have a real influence will be those when current plans need to be replaced, not the current situation.

Whilst the Sustainability Appraisal process is a largely paper exercise to make sure that procedures are in place to balance economic, social and environmental objectives, Strategic Environmental Assessment is far more concerned with predicting real-world environmental change likely to arise from the scale, character and broad location of proposed development.

In this case, foreseeing the effects of the JSSP so far ahead is particularly challenging. The emphasis should therefore be on the iterative process, taking historical trends and the likely speed of their acceleration in the context of a step-change in the scale and extent of development, in order to start to define real objectives.

As it stands, we fear that the proposed scope is inadequate for the scale and timeframe of the proposed Oxfordshire Plan 2050.

2. Are there any additional plans, policies or programmes that are relevant to the SA policy context that should be included?

The SA report will need to be much clearer about the legal status of the Plan, what weight it will carry and how it will influence decision-making under other plans (for example, in decisions relating to the Oxford-Cambridge Expressway and growth corridor).

The coverage of environmental protection objectives is weak, focussing on local plans, but with no mention of relevant environmental guidelines, nor the overarching framework set by international treaties, UK statutes and regulations, national sectoral policy and sub-regional sectoral policies and plans. For example, omissions include:

Environmental guidelines relevant to Oxfordshire & its Districts

- Landscape character assessments of the County, each District and each AONB and associated strategies and guidelines
- District design guidance
- Oxfordshire's historic landscape characterisation
- Oxford City Council's heritage plan
- Archaeological research agendas (Solent, Thames and Oxford City)
- Oxfordshire biodiversity action plans

Planning Frameworks (some statutory)

- Regional and local health planning
- Thames Water and river Catchment Management Plans
- AONB Management Plans (Cotswolds, Chilterns, North Wessex Downs)

Legislation that includes environmental objectives

- CROW Act
- Listed Buildings & Conservation Areas Act and other heritage legislation
- Environment Protection Act
- Environment (Principles and Governance) Bill

International conventions

- UNESCO: World Heritage
- Council of Europe: Florence, Valetta, Granada.

Paras 2.1.3-2.1.5 - reference should be made to the statutory legal duties and obligations that underpin these environmental objectives. These are far more binding than *'the environmental, social and economic objectives contained within international and national policies, plans and strategies'* referred to which are themselves shaped by such statutory requirements. The primary reference here should be to the relevant statutory duties (eg CROW Act, NERC Act, Listed Buildings and Conservation Areas Act and other Heritage legislation).

Table 2.2

- **Land - should include 'Preserve the openness and permanence of the Green Belt' (in line with national policy)**
- *'Where possible, safeguard historic assets including their setting'* falls a very long way short of statutory duties and NPPF to have **special regard** to and give **great weight** to preserving designated heritage assets and their settings. The phrase 'where possible' and complete absence of any reference to designations is seriously misleading and clearly undermines the statutory importance of safeguarding historic environment. There is no mention of historic landscape character.

Appendix 2 also omits key statutory provisions and duties, notably the complete absence of any reference to heritage legislation and designations and the statutory duties that apply to listed buildings and conservation areas; also with regard to landscape, the absence of any reference to the CROW Act and the duties to conserve **and enhance** natural beauty; and for biodiversity the absence of the existing duties to enhance as well as conserve biodiversity and the draft legislation designed to strengthen these duties.

Overall, these omissions mean that the environmental objectives have not as yet been sufficiently well defined to be consistent with the overall framework within which the Oxfordshire Plan 2050 must operate.

3. Does the existing and emerging baseline information provide a suitable baseline for the SA of the Oxfordshire Plan 2050 (JSSP)?

To understand the likely effects of the Plan, it is essential to apply the experience of actual past change as a key part of the baseline within an ever-changing scenario. The approach adopted is to imagine a static world that simply is not static: **the ‘current state of the environment’ can only mean the current trends in environmental change, NOT static lists of environmental resources and designations.**

The likely *evolution of the environment* without implementation of the plan or programme does NOT mean an unchanging environment, but where current trends will end up, taking account of factors already in place that may influence such change (one of which might be currently proposed legislation on environmental governance).

Para 3.3: Scoping out topics ‘*because the location of development will not affect those issues*’ is both unsubstantiated and fraught with danger given that significant cumulative or indirect consequences may well arise. There is no evidence at all that the potential for such effects has been considered. In the case of waste, the scale of domestic and commercial development facilitated by the Oxfordshire Plan 2050 and the nature rather than location of development obviously has potential environmental implications depending on what waste strategies are adopted for avoiding, recycling waste or converting it to energy. These have implications for transport and capacity of recycling and energy infrastructure with indirect effects on climate, air quality etc which cumulatively could be significantly different at the end of the plan period than at the beginning.

Para 3.5 - The SEA Regulation requirement is for the environmental characteristics of areas *likely to be significantly affected* NOT the whole county or the whole of every District. **Covering the whole county as if equally affected manifestly distorts the assessment and is bound to result in a substantial under-representation of the significance of effects.** It also badly distorts the baseline information, by implication treating the environment as changing uniformly whereas that is far from true. This is patently obvious when consideration is given to the current location of areas of housing growth, commercial and industrial development, minerals etc where environmental change is rapid as compared with other areas where trends may be far less noticeable.

The SA will need to consider which areas are likely to change most and hence where environmental effects are likely to be most significant. This also reinforces the point made above about why the baseline information must be trend-based.

Without addressing these issues, the baseline information will be inadequate to support any realistic assessment of the effects of the Oxfordshire Plan 2050.

Para 3.8 states that *“improving the connectivity on this corridor, through East-West Rail and the Oxford to Cambridge Expressway projects, is a key ambition for Oxfordshire”*. However, the opinion of the people in Oxfordshire is not yet sought on this; the vision and benefits are not yet defined or proven. Making the assumption that this is the case is erroneous at this time unless the Plan has no alternative than to accommodate this ambition, in which case it is an imposed and fixed parameter that needs to be considered in that context, as an objective for the benefit of the UK, and this should be made explicit throughout the OxPlan process.

Paras 3.9-3.14 Population issues - The pressure of growth is NOT evenly spread across the county or districts as the tabulation and lack of detail might be taken to imply.

Para 3.19 claims that *‘New development near to deprived neighbourhoods can help to stimulate regeneration in those areas.’* Whilst we accept this could be true, we note that the opposite statement could also be true, for example loss of accessible green space could exacerbate environmental issues and have a negative impact on health and well-being.

Para 3.20 - the truly remarkable Oxford centric nature of this paragraph is concerning and sets the tone for relegation of more rural parts of the county, and the rural economy, to second place in both the OxPlan and any sustainability assessment. The rural economy and its importance in the long-term sustainability of local communities and the environment in their care, should not be assumed to be secondary by decision makers by dint of population number differentials.

Table 3.3 - Key sustainability issues in relation to population:

- This should clearly make reference to the environmental implications arising from increased development/population growth.
- Economic growth may reduce inequalities, but it may also increase them eg if house prices increase due to the attractiveness of an innovation hub with high wage jobs
- ‘The JSSP provides an opportunity to reduce car use’ - only in terms of marginal limits on the overall dramatic increase implied by the growth strategy as a whole.

Paras 3.25-3.54 - as with population above, we have similar concerns about the sections on **housing, employment and transport**, all of which fail to acknowledge that implications may not be equally felt across the county and that there are significant environmental implications arising from increased development.

Table 3.6 - Key sustainability issues for housing:

- The additional scale of demand arises from growth targets, on top of Objectively Assessed Need, and is being imposed through the Growth Deal - this is the only factor that is likely to prevent local authorities keeping pace with demand.
- The statement that house prices will continue to rise without the JSSP needs to have appropriate supporting commentary if it is to be considered seriously. If this is not able to be justified as a statement, then it should be excluded. Conversely, the statement implies that *with* the JSSP, house prices will fall. This is vanishingly unlikely given that developers are only incentivised to build at a rate that maintains their margins and that on any given day, the market is set by existing housing stock rather than new-builds.

Table 3.7 - Key sustainability issues for Economy & Employment:

- The sustainability of the current job market in Oxon seems to be quite robust. The impact on other areas of the UK from investment in Oxon/the JSSP is not explored. Attracting people to the area is not going to help sustainability in other parts of the country and could provide a localised “brain drain”, further depressing some regions/making them less attractive for investment.
- Specific opportunities for low and unskilled workers needs to be recognised. We would also expect to see reference to the rural and agri-economy, especially in the context of the 25 Year Environment Plan, new agri-environment schemes and post Brexit.
- The statement that the “JSSP provides the opportunity to focus planning and investment on key economic sectors and strategic corridors and locations, supported by sufficient infrastructure to provide the conditions to make Oxfordshire’s economy competitive” raises a number of questions. Who are we competing with and will sectors or areas that are less key or relevant to priority growth areas be omitted from investment, thereby increasing an economic and social gap between areas in Oxfordshire or between Oxfordshire and elsewhere in the UK?

Paras 3.55-3.58 - Air quality - Table 3.10 should make it clear what the current trend is (improving or worsening)

This issue brings back into question the need to re-join the updating of the Local Transport Plan and JSSP and also the whole issue of the scale of and reason for growth. What are the key objectives? Are they to accommodate the UK wide economy, and thus through traffic (especially freight), or are we optimising for a localised economic growth through increasing housing and employment sectors that can accommodate alternative working patterns, shared workspaces, homeworking etc? The differences and balances in these will significantly affect the air quality

questions and solutions that need to be asked (and the same goes for other, following, sections of the report).

Paras 3.59-3.61 - Climate change - Table 3.12 should make it clear what the current trend is (improving or worsening)

Paras 3.62-3.66 - Water -

This one issue alone is significant in any appraisal of the long-term sustainability of large scale growth ambitions for the county and brings into question the focus on growth on this one highly stressed area.

There is no indication of whether water quality is getting better or worse, or why, nor the projected rate of growth in demand for water (not just in Oxfordshire but in other areas supplied by Oxfordshire resources). While increasing need to treat waste water is mentioned, there is no indication of either the projected capacity of existing infrastructure to cope with increasing demand up to 2050, or alternative means of addressing the problem though already proven water recycling methods which could greatly relieve environmental impacts.

These are critical issues as there are such a wide range of different solutions under discussion, from some that would have hardly any physical footprint in Oxfordshire to others that could be potentially devastating to the local environment (the potential site of the Thames Water reservoir at Abingdon has been safeguarded but is rather surprisingly not mentioned.)

Given recent cases in the county of untreated sewage being discharged into rivers, due to inadequate/overloaded infrastructure, we would expect to see this issue reflected in the text.

As presented, we consider the baseline on water resources and waste water treatment and related issues to inadequate to address these issues.

Paras 3.67-3.72 - Flood risk - this section should include evidence about how much development has been occurring in flood-risk areas; what additional run-off is already being experienced from new development; the nature of such development (housing roads, minerals etc) which have very different implications; and whether land is allocated for future development in flood risk areas. In each case, information on current trends is required. **Figure 3.4** makes no attempt to show flood risk relative to the pressures of development, and there is thus no indication of actual locations where problems are most likely to arise.

This section on flood risk therefore currently falls short of the baseline needed to meet SEA requirements properly.

Paras 3.73-3.77 - Soils - information is required on the current rate of loss of agricultural land to development, what proportion of this is best and most versatile

and whether the rate is increasing or slowing down, and how that trend is due to change because of existing development allocations and projections. The cumulative effect of existing plans has never been calculated but is clearly ascertainable in reasonably accurate terms from the totality of all different land allocated/safeguarded or implied from projected demand. Only with this calculation in place can the cumulative effect of soils attributable to development facilitated by JSSP be assessed.

There is no discussion of issues related to the indirect effects of loss of agricultural land, soil degradation, loss and erosion which relate to water, biodiversity and archaeology.

The baseline evidence for the environmental effects related to soils and best agricultural land is thus inadequate to meet SEA requirements.

Paras 3.78-3.86 - Minerals - This section concerns ONLY the need to ensure an adequate supply and not to sterilise important mineral resources through other forms of development. It says nothing about how far Oxfordshire minerals are underpinning development outside the County or the many environmental effects of mineral extraction, including cumulative and indirect effects on landscape, biodiversity, archaeology, historic landscape character, heritage settings, water and a further raft of effects indirectly arising from needs to provide adequate transport links. An absolutely crucial consideration for the Oxfordshire Plan 2050 is how far and at what stage new areas for mineral extraction need to be opened, with all the consequential implications for new infrastructure as well as major direct land take, introducing serious environmental effects for the first time to hitherto relatively unspoilt landscape and still coherent archaeological landscapes. Both the impact on biodiversity and the opportunities offered for possible long terms net benefits through new habitat creation in existing areas that reach the limit of supply and as new areas are exhausted need to be considered.

A further major issue not considered is how far the demand for non-renewable natural mineral resources can be reduced in favour of better, more sophisticated recycling of aggregates, both within the county and beyond. In respect of supplying areas outside the county, consideration must be given to how alternative sources such as marine aggregates are being used and what potential there is to further relieve pressure on Oxfordshire's mineral resources.

This baseline evidence is currently inadequate to address the environmental impacts of mineral exploitation, falling a long way shore of SEA requirements.

Paras 3.87-3.89 - Biodiversity - this section requires evidence of past and current trends in habitat and species loss or gain. Although such trends are variable among different habitat types, and species of fauna and flora, a great deal of information is available that has not been cited.

It is surprising that Wild Oxfordshire's report on the state of Oxfordshire's wildlife has not formed the basis of this section. See:

<https://www.wildoxfordshire.org.uk/stateofnature/reports/>

By focussing only on designated sites the scope is not only at odds with DEFRA's 25 year plan but also fails to address the most sensitive aspects of Oxfordshire's wildlife which is the steady depletion of habitats and species - and conversely the success stories in proactive habitat creation and targeted species conservation.

As it stands this baseline is entirely inadequate to understand properly the trends and where the Oxfordshire Plan 2050 could have a real influence, and this does not meet SEA requirements. In this context the duties on public bodies proposed in the Environment Governance Bill are highly relevant.

Paras 3.92- 3.97 - Heritage - the numbers of designated heritage assets is an almost meaningless piece of information: what matters much more is the pressure on the historic environment and most of that arises in connection with the overall historic character of the landscape, changes to the character and setting of conservation areas and loss of archaeological remains - the latter having knock-on effects in terms of services to conserve and curate archives generated by development-led archaeology.

A key issue is how far the necessary information and guidance to inform development is in place - in general policies and general design guidance are, but Conservation Area appraisals are very patchy; yet these are critical to sound decision-making in much the same way as biodiversity information. Oxford City Council has an excellent basis for guiding and monitoring archaeological pressures but the county's resources for the rest of Oxfordshire do not match the same high standard. Likewise, surely the point of the County doing a GIS based historic landscape characterisation of the whole county is to help inform strategic planning? Quite apart from defining areas that are historically least changed or most unusual, there is also great scope to define areas that have seen the most rapid change in the last 50 years and more, and thereby help identify where further change should be guided - including opportunities for enhancement of badly degraded landscape.

These issues matter because they are resources that really help in providing the basis for guiding and monitoring the effectiveness of policy. They must be recognised in the baseline, if they are to serve their core purpose of helping to guide strategic development.

The number of planning applications affecting Conservation Areas and Listed Buildings are readily ascertained, and although they will not be all related to detrimental change, mapping them would provide a clear indication of where most pressure arises. Likewise, both the City and the County keep information on archaeological interventions triggered by planning, so it is quite possible to map these and demonstrate where the greatest pressure on the County's archaeological resources have been, which would be a sound basis for comparison with where pressures are most likely to arise in future.

Although there is not the equivalent of Wild Oxfordshire's excellent *State of Nature* report, there are several readily usable sources of data that could be used to map properly the areas where Oxfordshire's historic environment is under most pressure - but this has not been attempted. As with biodiversity, it is thus impossible to gauge from the so-called baseline presented how far future development will add to ongoing trends of loss and degradation of historic character and how far the richest and/or rarest surviving character will be under pressure.

Although the importance of Oxford's heritage is recognised there is no reference to all the different aspects covered by the City Council's Heritage Plan and the trends that are emerging, especially for example with regard to high buildings. The setting of Oxford and its skyline composed of a major cluster of Grade I II* and II listed buildings with a number of Conservation areas is treated as mere landscape and views (in para 3.100) NOT as it clearly should be an issue of heritage settings to which great statutory duties for preservation and enhancement and great weight planning test applies. The City's view cones are very far from mapping the full aspects of setting that are relevant and are based only on views *of* the city, entirely failing to reflect the iconic views *across* and *from* the city by which the vast majority of visitors appreciate Oxford's skyline and setting.

The bland statements in Table 3.21 are meaningless in predicting what effects further development under the Oxfordshire Plan 2050 will bring - and where there are degraded areas most ripe for enhancement.

This is NOT an adequate basis to judge the effects of the Plan on the historic environment in any meaningful way, and once again this does not meet SEA requirements.

Paras 3.98- 3.110 - Landscape - this requires trend information about landscape change or pressure relative to nationally and locally designated landscape areas and the Green Belt. The absence of any reference to the Area of Outstanding Natural Beauty (AONB) management plans, guidance and position statements as defining key issues for the AONBs is a major omission. (The paragraphs describing the areas defined by the national character map are entirely misconceived because the County, District and AONB appraisals are all based on this framework and provide the extra levels of detail needed to define key issues for the county.) The absence of any attempt to map where the main areas of recent development, allocated development sites, and areas of potential (eg for minerals and major infrastructure) against these landscape appraisals is a very obvious gap. When combined with the failure to consider the county historic landscape characterisation noted above, there is little or no possibility of identifying trends relative to key aspects of the landscape and where opportunities for enhancement may arise.

Once again Table 3.22 consists of general statements that do not support meaningful assessment.

There is therefore no adequate baseline for properly assessing which parts and characteristics of Oxfordshire's landscape will be most under pressure under existing

plans or how the county's landscape can best be conserved and enhanced into the future.

Paras 3.111 - 3.114 - Green Belt - this section does very briefly allude to (though does not quantify or map) historical trends that have seen a significant switch from tight control of development to de-designation to allow development. The assertion that there is currently debate about whether more land should be released for development than those areas removed from the Green Belt in the 1990s by the City Council is misleading and inaccurate: major areas have already been earmarked for release in local plans that are adopted or well advanced, and there are other major pressures on the Green Belt land especially related to transport infrastructure and flood alleviation measures.

The currently projected development within the Green Belt, together with areas that have been assessed as more or less sensitive to change is readily ascertained from published sources and could easily be mapped. This should distinguish allocated development areas, safeguarded sites and corridor options for projected infrastructure, and areas that have been considered but not yet seen as being required for release from the Green Belt within current planning timescales, which presumptively may be seen to be needed within the JSSP timeframe if current demographic trends and stimulation of accelerated economic growth continue unabated.

This is the true baseline trend that needs to be managed through the JSSP and it is deeply misleading not to demonstrate this. This falls so far short of SEA requirements as to be positively misleading.

Although already designated environmental sites are known and recorded, unrecorded ones are not. It must be assumed that there are an open-ended number of these within land which has for fifty years or more had formal Green Belt protection and this should be given weight in any decision.

This is notwithstanding the obvious environmental benefit of protected open green land on the City's doorstep and the environmental value it provides to City dwellers to experience the countryside and act as the "lungs of the City". The Grenoble Road site is the clearest possible exemplar of the Green Belt's environmental benefit with the highly built up area of the Leys on one side of the road and untouched open farmland crisscrossed with footpaths on the other.

Whilst some sites in the Green Belt have been well-researched and designated, primarily because of the University happening to be interested in them, or owning them, swathes of the Green Belt particularly to the South of Oxford have received no such scientific attention. It is unreasonable to think for example that there are fewer ancient meadows or habitats along the meandering Thame than on the Thames itself, witness the new Local Wildlife Site at Waterstock uncovered in research related to the Expressway.

At the very least the precautionary principle should be applied until a proper assessment has been made.

Paras 3.115 - 3.123 - Sensitivity mapping study - the methods adopted by this study to examine some aspects of environmental sensitivity are fundamentally flawed. For example, despite the county's historic environment being cited as a key aspect of Oxfordshire's identity, attractiveness and contributor to people's quality of life, the study only examines four kinds of designation that are under least pressure of change, completely failing to consider conservation areas and their settings, listed buildings archaeological resources or the historic character of the county.

The report itself stresses its limitations and states *"The results of this study are not a replacement for standard planning protocol and the evidence studies undertaken by local planning authorities to inform Local Plans, and its limitations should be recognised"* On this basis it clearly should NOT be used as part of the baseline study for the SA/SEA of the JSSP and instead **proper evidence studies (as briefly outlined above for each topic) should be undertaken, starting from a basis of seeking to understand the reality of ever-moving trends of environmental change, not the artificially static, partial and often incomplete and in some cases misleading picture that this scoping report presents.**

Para 4.11-4.13 - this identifies the LEP's Strategic Economic Plan as "the key driver for local economic growth in the future". There has been no consultation on this. This objective is not one arising from within the JSSP process, but from an associated initiative and the adoption of that particular objective has yet to be tested. If adopted for the strategy, the SA needs to ensure that there is clarity on what benefits the objective is going to deliver against which the impact can be assessed.

Para 4.17-4.18 - The SA should take the probability and practicality of any required funding for any mitigation measures into account in its modelling and assessment, and any risk should be a limiting factor to the scale of proposed growth.

4. Are there any additional SA issues relevant to the Oxfordshire Plan 2050 (JSSP) that should be included?

Green Infrastructure Strategy

As noted at Para 4.2, the Oxfordshire Infrastructure Strategy in 2019 identified the lack of a green infrastructure strategy for the county. We are pleased that the Oxfordshire Plan (Para 2.3) intends to rectify this, as CPRE believes that such a strategy is absolutely fundamental to guiding the level and scale of future development appropriately.

Given the critical nature of this strategy, we believe that the Scoping Document should clearly identify this as a current gap in the baseline information and ideally explain how our local authorities are intending to remedy this, in advance of considering spatial development proposals.

Light Pollution & Dark Skies

The Oxfordshire Plan 2050 could make a step change to a far more proactive co-ordinated effort to ensure that a consistent strategic and robust approach is taken to enhancing dark skies

In addition to being a key aspect of natural beauty (as recognised in AONB management plans) dark skies are important for wildlife, heritage settings and human health. Light pollution has become an increasingly serious problem and CPRE's night blight initiative and interactive mapping of dark skies, together with technical guidance on how to reduce and reverse light pollution point to how the ongoing loss of dark skies can be brought under control and monitored. The CPRE dark skies map already shows where light pollution is worst and dark skies still best survive and the current iteration can be compared with previous versions to demonstrate the ongoing spread of light pollution. Comparing this mapping with the distribution of urban, suburbanised rural and rural settlement suggests that the spread of suburbanisation of settlements is a key driver of light pollution. Until a few years ago light pollution seemed an inexorable blight for which there was little remedy; now there are technological and light management solutions that offer the opportunity to reverse trends.

Although all Oxfordshire's districts have light pollution policies, hardly any have proactive dark skies policies that seek to reduce existing light pollution, and the county transport plan has no policy (although highways are a key contributor to rural light pollution). The Oxfordshire Plan 2050 could make a step change in the approach to this issue.

Tourism

As an area with both international and many nationally significant attractions, the ability to accommodate visitors in a sustainable way without harming the very assets they come to enjoy is a key issue for the next 50 years and one that currently is not properly addressed in local and transport planning.

This is another cross-cutting issue related to landscape, cultural attractions events, heritage and museums. Tourism is generally seen as an undiluted benefit in terms of the local economy; it is already rapidly growing and there are ambitious plans to increase tourism in Oxfordshire further. But this cannot be achieved without environmental cost and there are already cases where there are problems of capacity, including in some cases direct impacts on heritage and other assets to accommodate more tourists and the parking and other facilities needed to accommodate them (illustrated by parts of the Grade I Blenheim Park World Heritage Site being used as a large car park for visitors and pressures on coach parking in Oxford, and congestion in some Cotswold villages).

Para 4.24 - currently lacks any reference to environmental studies, guidance, management plans and position statements. As well as referring to the statutory consultation bodies such as Natural England, it would be appropriate to mention the non-statutory organisations/voluntary bodies (often supported by these agencies) that undertake vital professional work that could helpfully inform the Oxfordshire Plan 2050, including organisations such as RSPB, Wild Oxfordshire and CPRE. However, as it stands, it fails to identify what already exists or future requirements to enhance environmental information to provide a much better platform to understand and manage change.

5. Is the SA Framework appropriate and does it include a suitable set of SA objectives and appraisal criteria for assessing the effects of the proposed Oxfordshire Plan 2050 (JSSP) and reasonable alternatives?

Overall, there is a complete absence (see for example Paras 4.25-4.27) of discussion of the step change in pressure on the environment likely to arise from the Growth Board's ambitions for economic expansion.

This may be what is expected of sustainability appraisal, but it is not what the SEA regulations require, which is a picture of actual change and what measures will be required to avoid, reduce, minimise or offset harmful effects or maximise benefits.

Assessment of environmental effects cannot be sound and adequate if the baseline is not robust. Unfortunately the SA objectives and appraisal questions do not, in our view, meet SEA requirements. In particular:

- The objectives do not cover all the topics required by SEA eg archaeological issues
- The requirement to look at interactive effects amongst the topics is not considered (see comments above on water, soils, tourism etc).

The appraisal questions as posed fall a long way short of the SEA requirement to consider '*(f) the likely significant effects* on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (*These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.)*'

But some questions also serve to emphasise some of the clear shortcomings of the baseline identified above.

- For biodiversity, there is no read-across to the Government's 25 years plan, established biodiversity target areas and habitats, and the general aspiration to 'safeguard' locally and nationally designated assets and habitats makes no reference to the need to enhance them; no reference is made to threatened species, nor what an 'overall net gain in biodiversity' means. Once again the baseline as presented simply does not allow these questions to be addressed meaningfully or for a monitoring framework to be established.
- In relation to heritage there is no mention of undesignated archaeology- the heritage resource arguably under greatest pressure of development (and often of regional and not infrequently national importance). The laudable question of whether the Oxfordshire Plan 2050 will *encourage conservation management and enhancement of the County's heritage assets particularly heritage at risk and historic landscapes* [added emphasis] highlights the yawning gap in the baseline evidence that makes no mention of either heritage at risk or historic landscape character.
- It is noticeable that the landscape questions make no reference to enhancement despite this being part of the statutory duty for AONBs. Once

again, including special views of and from Oxford here belittles the real point that the Oxford skyline composed of major listed buildings within Conservation Areas is an internationally significant cluster of designated heritage assets whose setting is a statutory consideration requiring 'special regard' and 'great weight,' not merely a locally designated set of 'special' views.

The standard 'traffic light' approach to SA may be fine for the largely self-fulfilling process of sustainability appraisal of objectives and policy options, but it is most unlikely to fulfil the requirements of the UK SEA process in which actual changes for good or ill need to be predicted as far as reasonably practical - taking account of the complex interactions between different aspects of the environment.

Especially in the context of the severe shortcomings of the baseline data presented here, this approach is likely to be very poor at achieving the requirements of SEA to identify and where possible describe (and preferably quantify) the likely effects on the environment. In particular it is very unlikely to identify as required the impacts on areas most likely to be affected significantly by the development facilitated and promoted by the Plan.

Further comments on specific objectives:

SA 3 Communities

- Infrastructure should be appropriate and timely
- We need the right type and tenure of homes to reflect local need
- Respect for the rate and capacity of a community to grow without damaging social cohesion
- Respect for the character, culture and ethos of a community.

SA 5 - Employment

- Generate opportunities for lower-skilled
- Invest in and enhance rural, agri and tourism based economies
- Ensure a gap does not emerge between areas of high investment (City and Arc) and other parts of the (rural) county

SA6 - Car travel

- Needs a reference to the issue of through travel.

SA7 - Climate change

- Fails to reference the Oxford-Cambridge growth corridor and expressway, which will have significant impact.

SA15 - landscape character

- The character and distinctiveness of Oxfordshire's settlements needs to encompass not only the visual, but also the social/cultural.

6. *Do you have any further comments you would like to add?*

Our over-riding concern is that because of the fundamental problem of not looking at either historic trends or emphasising current trends (for better or worse), no evidence is presented as to which issues present the greatest challenges and which the greatest opportunities. By failing entirely to consider how Oxfordshire has changed in the last 30 years, it provides no solid context within which to predict trends into the future.

As proposed in this Scoping document, we would therefore consider the process inadequate to assess or address the major long-term environmental pressures and opportunities that confront Oxfordshire in the next 30 years.