Section 5.4.11 Baseline and future trends section updated for ISA report.

5.7.14 Baseline and future trends section updated for ISA report.

Topic Transport Action

5.7.4 Transport Action

5.8.14 Transport Action

This section completely fails to mention the opportunities that arise from traffic reduction, such as reduced air pollution. This section uses the discontinued term ‘accidents’ to depict ‘crashes’. The use of the term ‘accidents’ is a misnomer as many crashes are avoidable and therefore cannot be accidental. Using the term ‘accidents’ is a misnomer as many crashes are avoidable and therefore cannot be accidental. Using this wording undermines the seriousness of the issue and deflects responsibility from those who cause crashes by their increased risk taking and the measures needed to address this.

Action Required/Summary of Action taken

Comment Community Safety

This section should reference the issue raised above about deteriorating accessibility in the countryside for people particularly where there is new road infrastructure which breaks or sends walking, cycling and horse-riding routes on long diversions. This reduces the attractiveness and the recreational opportunities it provides. These negative impacts should be reflected here given the large number of new roads being suggested by the draft Transport Strategy.

Baseline and future trends section updated for ISA report.

Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and effects.

Baseline and future trends section updated for ISA report.

Baseline and future trends section updated for ISA report.

Baseline and future trends section updated for ISA report.

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Baseline and future trends section updated for ISA report.

Baseline and future trends section updated for ISA report.
As mentioned above, there is no mention of the opportunities that traffic reduction alongside more active travel and public transport use would bring, this time in terms of reduced noise pollution.

Transport Action
Baseline and future trends section updated for ISA report. Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities.

No. | Reviewer Initials | Section | Comment | Topic | Action Required/Summary of Action taken
--- | --- | --- | --- | --- | ---
13 | Transport Action Network (TAN) | S.12.8 | The opportunities listed on page 8 are very weak and other than adaptation, there is only mention of infrastructure for electric cars. There is no mention of the co-benefits arising from promoting more active travel or change (to tackle climate change) such as a fitter and happier population, placing less demands on the NHS, enhanced economic productivity, less absenteeism, etc. No mention of creating more attractive places to live with higher quality, more dense development based on public transport and infrastructure and hence less countryside wasted storing private cars. | General | Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities.

12 | Transport Action Network (TAN) | S.12.10 | The opportunities listed on page 8 are very weak and other than adaptation, there is only mention of infrastructure for electric cars. There is no mention of the co-benefits arising from promoting more active travel or change (to tackle climate change) such as a fitter and happier population, placing less demands on the NHS, enhanced economic productivity, less absenteeism, etc. No mention of creating more attractive places to live with higher quality, more dense development based on public transport and infrastructure and hence less countryside wasted storing private cars. | General | Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities.

13 | Transport Action Network (TAN) | S.12.10 | There is no mention of new development needing to make more efficient use of land – fewer, smaller, higher density developments on the back of high quality mass transit would deliver considerable, less of agricultural and soil and climate emissions. Whilst it could be said to be covered by the term resource efficiency, that tends to be a generic and broad development of the circular economy and is not considerate of the land use implications. Climate change and city development could prevent a big opportunity to orthogonalise the cityscapes and should be explicitly mentioned. | General | Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities.

14 | Transport Action Network (TAN) | S.14.7 | Yet again, there is no mention of the opportunities that traffic reduction alongside more active travel and public transport use would bring, this time in terms of reduced noise pollution. | General | Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities.

15 | Transport Action Network (TAN) | S.14.7 | Population and equality – the evidence in the sector is too vague and fails to highlight the severe discrimination against those with age and poverty characteristics. Most people are currently often prevented from driving or cannot afford to drive (or perhaps don’t want to drive) yet are given few other options in both urban and rural areas, although rural isolation is often worse. | General | Baseline and future trends section updated for ISA report.

16 | Transport Action Network (TAN) | S.14.8 | Sustainability and Aggregated Framework | Health | Sustainability objectives updated for ISA report


18 | Transport Action Network (TAN) | S.14.8 | Sustainability and Aggregated Framework | Community Safety | Sustainability objectives updated for ISA report

19 | Transport Action Network (TAN) | S.14.8 | Sustainability and Aggregated Framework | General | Comments apply to TS not ISA, the former having to be guided by targets, the latter assessing only. See response to comment 11.

20 | Transport Action Network (TAN) | S.14.8 | Sustainability and Aggregated Framework | General | Programme error in table, updated for ISA report.

21 | Transport Action Network (TAN) | S.14.8 | Sustainability and Aggregated Framework | General | Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Appendices updated for ISA report
Recommendations made for TS Cowley Area Transport
Chiltern Society
Transport Action
Historic England

An issue arising from emissions from transport which needs specifically noting and responding to in the Scoping Report, is the effects of NOx emissions on sensitive vegetation. NOx can have...

We note your draft principles at para 2.1.4. We are surprised to see that there is no key principle relating to the environment (both natural and historic). We strongly advise that you include a...

We note that table C2 relates to Plans in the area and we welcome the inclusion of many Local Plans within this table. We note that you have also included some SPDs (e.g. Bedford - Open...

Appendix C

Historic England

Due to the scale of the EEH region we could not ensure that all SPD documents were included. In order to make this fair, all SPDs have been...

Appendix C

General

Appendix updated for ISA report

We also note that it is only now that scoping of the SA is being undertaken – ideally this should have been completed much earlier in the process. SA/SEA is an iterative process that needs to...

Appendix C

General

Comment noted.

We note that there was consultation on the draft Transport Strategy in 2019 (para 2.1.3). To our knowledge we were not consulted at this stage. We are a statutory consultee providing...

Appendix C

Historic England

This section also fails to mention the Committee on Climate Change’s 2010 progress report which says that the Government has delivered just 1 policy action out of 25 recommended by the...

Appendix C

General

Cross referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Appendix updated for ISA report

No.

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In paragraph 5.9.8 we suggest that historic assets be replaced with heritage assets. The final bullet point on page 34 applies to Conservation Areas, Registered Parks and Gardens, World Heritage Sites, Thames, Warborough and Shillingford, Brightwell-cum-Sotwell, and Little Wittenham commissioned from Oxford Archaeology by Historic England in 2016.

We note that Table 4.1 in the Scoping Report sets out the key messages from the Review. On page 12 in the section on the Historic Environment we suggest that in the first bullet you change historic assets to heritage assets and undertake a non-designated (to be consistent with the NPPF terminology). We also suggest that you use the word setting in relation to heritage assets. We also suggest that you make reference to Heritage at Risk and historic landscapes and townscapes.

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40 Historic England Page 49

We note the key sustainability issues for the historic environment identified on page 48 of the Scoping Report. We broadly welcome the key sustainability issues but they could be further improved by the following changes. They should refer specifically to designated as well as non-designated heritage assets and their settings. Again, we would stress that issues such as pollution can affect Registered Parks and Gardens, WHS, etc., not just listed buildings and scheduled monuments.

Historic Environment

We would suggest that the starting point for considering key sustainability issues for the historic environment should include:

- Conservation and enhancing designated and non-designated heritage assets and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures

Areas where there is likely to be further significant loss of or erosion of landscape/urban/townscape character or quality, or where development has had or is likely to have significant impact (direct and/or indirect) upon the historic environment and/or people's enjoyment of it

Traffic congestion, air quality, noise pollution and other problems affecting the historic environment (this does not just apply to listed buildings and scheduled monuments as currently implied on page 48 of the report).

In the section on landscape and townscape references could also be made to historic landscape characterisation.

We note the sustainability objective for the historic environment on page 48 of the Scoping Report. As provided, the objective is quite short. We would suggest changing it to something in line with the terminology in the NPPF.

40 Historic England Page 50

In addition we would recommend including indicators as part of the assessment process. Again, further advice on indicators and monitoring is given at paragraphs 2.13 – 2.16 of our advice note on Sustainability Approaches.

Historic Environment

It may be helpful to develop decision making criteria to assist in the assessment process. Examples of criteria that could be included include paragraphs 2.12 of our advice note on Sustainability Approaches.

40 Historic England Page 50

In addition we would recommend including indicators as part of the assessment process. Again, further advice on indicators and monitoring is given at paragraphs 2.13 – 2.16 of our advice note on Sustainability Approaches.

Historic Environment

Sustainability objectives updated for GSA report

40 Historic England Page 51

We would also suggest including objective as part of the assessment process. Further advice on sustainability indicators is given at paragraphs 2.13 – 2.16 of our advice note on Sustainability Approaches.

Historic Environment

Indicators used for assessment of strategic corridors. Indicators forming part of TS monitoring.

40 Historic England Page 52

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from successful development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

Historic Environment

Opportunities updated for GSA report and remain strategic in nature.

40 Historic England Page 52

We suggest that the draft TS does not identify development sites or projects. Therefore this level of detail is not possible in the GSA. Where spatial aspects (e.g. corridors which are being assessed in order to help inform a future programme of connectivity studies) have been assessed, proximity and density of assets informs the assessment and selection of options.

Historic Environment

It is not possible to assess at this level of detail with such project specific proposals.

40 Historic England Page 53

We would recommend that you consider the Planning Policy Framework (PPF) and paragraph 5.3 of the Scoping Report. These should also be considered as part of the assessment.

Historic Environment

Given the lack of specific sites for development, this request cannot be accommodated. Instead a sensitivity test has been undertaken on the ‘issues’ identified as possibly requiring transport solutions, so that the selection of alternatives is informed by heritage information.

40 Historic England Page 53

We would suggest the Historic England Advice Note 3 sets out a sequential approach to assessing the impact on heritage assets.

Historic Environment

No individual proposals are made as part of the TS. Policies and ‘corridors’ have been sensitively tested so that decisions can be made as to how to treat or buffer these alternatives. This includes heritage information.

40 Historic England Page 53

We would suggest that the historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on location or visual impacts, and assessment requires a careful judgment based on site evidence and available evidence base. This is the equivalent of a level of sites to determine if and where this may be necessary as part of the evidence base for transport proposals.

Historic Environment

Scoping and evaluation of archaeological and landscape impacts needs to be an imperative part of the assessment process where relevant. Our new guidance e.g. https://historicengland.org.uk/informed-consultation/guidance/impact-assessment/in-depth-impact-assessment/ provides a useful template to work from, with a view to exploring these questions and new questions asked (including site-specific, aerial survey, geophysical survey, field walking, deposit modelling, etc.) to ensure that the assessment is conducted in a robust and comprehensive manner.

40 Historic England Page 53

We would also note that we would be more confident in terms of impacts if such a method was applied to a number of projects.

Historic Environment

Method for Generation of Alternatives

References to the Scoping Report are given on pages 53-54. They should be updated and the figures in Appendix B should also be updated.

Historic Environment

No reference is made to the section in the Scoping Report.

40 Historic England Page 53

They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER, formerly Sites and Monuments Record; how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Historic Environment

In developing assessment criteria, we would advise against a purely distance-based approach. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage.

In terms of projects, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on location or visual impacts, and assessment requires a careful judgment based on site evidence and available evidence base. This is the equivalent of a level of sites to determine if and where this may be necessary as part of the evidence base for transport proposals.

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40 Historic England Page 53

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- Conservation and enhancing designated and non-designated heritage assets and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures

Areas where there is likely to be further significant loss of or erosion of landscape/urban/townscape character or quality, or where development has had or is likely to have significant impact (direct and/or indirect) upon the historic environment and/or people's enjoyment of it

Traffic congestion, air quality, noise pollution and other problems affecting the historic environment (this does not just apply to listed buildings and scheduled monuments as currently implied on page 48 of the report).

In the section on landscape and townscape references could also be made to historic landscape characterisation.

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Historic Environment

Opportunities updated for GSA report and remain strategic in nature.

40 Historic England Page 53

We would suggest that the Historic England Advice Note 3 sets out a sequential approach to assessing the impact on heritage assets.

Historic Environment

No individual proposals are made as part of the TS. Policies and ‘corridors’ have been sensitively tested so that decisions can be made as to how to treat or buffer these alternatives. This includes heritage information.

40 Historic England Page 53

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Historic Environment

Opportunities updated for GSA report and remain strategic in nature.

40 Historic England Page 53

We would suggest that the Historic England Advice Note 3 sets out a sequential approach to assessing the impact on heritage assets.

Historic Environment

No individual proposals are made as part of the TS. Policies and ‘corridors’ have been sensitively tested so that decisions can be made as to how to treat or buffer these alternatives. This includes heritage information.
The National Trust welcomes the commitment in the Environment Bill to ensure that the Chilterns is considered among those areas to be designated as a National Park. The Chilterns are a distinct landscape which has a high level of biodiversity and is an important asset for the health and wellbeing of local communities. The Chilterns are a unique and irreplaceable asset, and their protection should be a priority for any future development plans.

The Chilterns are internationally important for biodiversity and have been designated as a Site of Special Scientific Interest (SSSI) and a Special Protection Area (SPA). They are also home to a number of rare and endangered species, such as the Chiltern sand lizard and the Chiltern pollard willow. The Chilterns are also a key area for water catchment and provide important habitats for birds, mammals, and insects.

The Chilterns are a valuable asset for economic growth and have a significant role to play in the local economy. The Chilterns are home to a number of important businesses, such as the agriculture and tourism sectors, which contribute to the local economy and provide employment opportunities for local residents.

The Chilterns are also a key area for recreation, with a number of outdoor activities available, such as hiking, cycling, and birdwatching. The Chilterns are also home to a number of historical sites, such as the Chiltern Forest Park, which is a popular destination for visitors.

The National Trust is therefore delighted that the Chilterns is being considered for designation as a National Park, and we believe that this would be a significant step forward in ensuring the protection and conservation of this unique and important asset.
Table 6.1

Nature Partnership

Table 6.1

Sustainability objectives updated for ISA report

Recommendations made for TS

Biodiversity

We question the statement that development of the Greenbelt is likely to encourage less sustainable travel modes. Many potential development sites near urban areas with Green belts such as Oxford will have better access to public transport and active travel modes. We suggest that this statement should apply equally to suburban development in rural areas.

Water: re-phrase objective as to improve water quality and the water environment (such as chalk streams), to reduce water abstraction; and to manage and reduce the risk of flooding from all sources.

Noise and Vibration: the impact on the enjoyment of tranquil landscapes should not be included.

Chilterns Conservation Board (CCB)

Finally, we do feel that what is lacking, and would very much enhance the ISA, is a series of clearly articulated success criteria, targets and measures.

Finally, we welcome reference to NC within/adjacent to transport corridors and the fact opportunities can be taken to enhance other ESS.

We very much welcome the adoption of an approach that begins to incorporate Natural Capital (NC) and Ecosystem Services (ESS) principles and adopt approaches promulgated by the DEFRA report "Enabling a Natural Capital Approach" (ENCA) guidance published in March, which incorporates learning from the Local Natural Capital Plan work being carried out in the Ox-Cam Arc. We welcome the inclusion of Natural Capital as an additional ISA topic.

We very much welcome the adoption of an approach that begins to incorporate Natural Capital (NC) and Ecosystem Services (ESS) principles and adopt approaches promulgated by the DEFRA report "Enabling a Natural Capital Approach" (ENCA) guidance published in March, which incorporates learning from the Local Natural Capital Plan work being carried out in the Ox-Cam Arc. We welcome the inclusion of Natural Capital as an additional ISA topic.

Observation noted.

Details of specific provisions not possible at the strategic level of the TS and ISA; information likely to be available when specific proposals are ready for planning. Natural Capital and Ecosystem Services

Natural Capital and Ecosystem Services

We welcome reference to NC within/adjacent to transport corridors and the fact opportunities can be taken to enhance other ESS.

We welcome reference to NC within/adjacent to transport corridors and the fact opportunities can be taken to enhance other ESS.

Reference is made to helping to ensure that the Transport Strategy will maintain rather than degrade the provision of ESS from the region's NC and "ideally contribute towards delivering Net Zero Emissions by 2050."

We very much welcome the adoption of an approach that begins to incorporate Natural Capital (NC) and Ecosystem Services (ESS) principles and adopt approaches promulgated by the DEFRA report "Enabling a Natural Capital Approach" (ENCA) guidance published in March, which incorporates learning from the Local Natural Capital Plan work being carried out in the Ox-Cam Arc. We welcome the inclusion of Natural Capital as an additional ISA topic.

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The idea of autonomous vehicles does not reduce the potential transformative nature of the intervention. This might only consider shared vehicle technology. If truly autonomous vehicles were achieved, they would not be from a fleet of passenger vehicles used for personal transport, but rather a large portion of the required space parking—given they would not drive a desirability.

The area has already been well detailed, because more detailed staff about the proportion of CO2 emissions are emitted. Perhaps the units of the second number are wrong. Even if this was the error, the sentence should be replaced to read more easily—i.e. one intuitively compiler 33% to 18% and think that “that is not 1/3 reduction”.

This statement would be better phrased to stress the power cross-carbon opportunities in the region that cross-carbon.

Please clarify if these per-capita numbers are simply transport-related, or from all emissions. Presumably they do not include air travel, given Luton has the highest numbers. Why no environmental studies? For example, CPRE can supply tranquillity mapping, but there are many more environmental parameters that would be included in a technical environmental study.

This first sentence is worded strangely. It is meant to demonstrate that we will not be able to differentiate between the various warming scenarios on the near-term. The subject of the sentence is "the warming" not our estimates of it.

The bullet point on “The extent of future climate change will be strongly affected by the amount of greenhouse gases that the population chooses to emit” is incorrect over the timeframe of the Transport Strategy (and 2050) – which is reason of including 5.12.9 in the report. There appears to be no consideration of how rail interacts with other transport networks or the effects any new stations have on the local road network or on attracting development to the area.

This paragraph should surely contain references to modal shift and reductions in the need to travel by e.g. co-location of housing and employment and improved digital services.

It should read “do not reduce” instead of “continue to increase” – even in the highest concentration climate scenario, the emissions start to reduce by the end of the century (although CO2 concentrations obviously continue to increase).

There is no requirement for the TS to be a strategic spatial plan. There are spatial aspects to it, which are dealt within the ISA, but the methodology applied is applied to policies also. Once spatial proposals are made, they will be assessed at that time, but that is without the scope of this ISA.

This paragraph is incorrect over the timeframe of the Transport Strategy (and 2050) – which is reason of including 5.12.9 in the report.

This first sentence is worded strangely. It is meant to demonstrate that we will not be able to differentiate between the various warming scenarios on the near-term. The subject of the sentence is "the warming" not our estimates of it.

There is no requirement for the TS to be a strategic spatial plan. There are spatial aspects to it, which are dealt within the ISA, but the methodology applied is applied to policies also. Once spatial proposals are made, they will be assessed at that time, but that is without the scope of this ISA.

The bullet point on “The extent of future climate change will be strongly affected by the amount of greenhouse gases that the population chooses to emit” is incorrect over the timeframe of the Transport Strategy (and 2050) – which is reason of including 5.12.9 in the report.

It should read “do not reduce” instead of “continue to increase” – even in the highest concentration climate scenario, the emissions start to reduce by the end of the century (although CO2 concentrations obviously continue to increase).

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Sections updated for the ISA report

5.5.2 Continued traffic growth without adequate provision for pedestrians and cyclists’ facilities is unsustainable. Continued traffic growth even with provision for active travel is unsustainable!

5.12.9 The meaning of the 1st bullet-point is not entirely clear. The Transport Strategy can present opportunities for biodiversity enhancement through net gain, although avoidance of habitat loss and connectivity should always be the first priority.

5.13.9 The need to maximise domestic food production has recently become even more recognised than before. Therefore the area’s best and most versatile agricultural land needs greater

5.2.13 CPRE, The Countryside

5.11.13 1st bullet-point: Not only the designated landscapes identified in 5.8.9 but also locally-designated landscape areas such as Areas of Attractive Landscape and Areas of High Landscape Value different local authorities use their own terms. In addition there are many underdeveloped locally valued landscapes which should not be ignored in the Assessment.

5.10.9 The Chilterns and Cotswolds Areas of Outstanding Natural Beauty are also seeking National Park status and both were recognised by the Glover Review as having strong claims for such status.

5.6.9 As engine noise decreases, so tyre noise becomes more prominent, and particularly so in wet weather and where modern noise-reducing road surfaces are not used.

5.4.11 CPRE, The Countryside

5.9.8 There should be a reference to Green Belts in this Table, found within Beds, Bucks, Cambs, Herts and Oxon. Although not expressly an environmental or a landscape designation, transport

5.11.14 1st bullet-point: See our comment on para 5.11.13, above.

5.10.5 The need to maximise domestic food production has recently become even more recognised than before. Therefore the area’s best and most versatile agricultural land needs greater

5.8.13 To net zero carbon by 2050.

5.5.13 As we understand it, landscape and tranquillity are not being adequately addressed in the Local Natural Capital Plan. CPRE has pointed this out but the ISA must not ignore these topics

5.2.11 In making the start a little easier, this should be referred to in the Assessment, and the fact that some historic routes are also in National Parks should be noted. The ISA should

5.14.1 CPRE, The Countryside

5.8.9 As engine noise decreases, so tyre noise becomes more prominent, and particularly so in wet weather and where modern noise-reducing road surfaces are not used.

5.11.14 This is inconsistent with good practice, which is to begin the ISA early in plan-making, before any significant decisions have been made.

5.12.9 Other gaps in this table include:

5.10.4 Other gaps in this table include:

5.11.9 CPRE, The Countryside

5.14.1 Other gaps in this table include:

5.5.13 As we understand it, landscape and tranquillity are not being adequately addressed in the Local Natural Capital Plan. CPRE has pointed this out but the ISA must not ignore these topics

5.13.9 The need to maximise domestic food production has recently become even more recognised than before. Therefore the area’s best and most versatile agricultural land needs greater

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<table>
<thead>
<tr>
<th>No.</th>
<th>Reviewer Initials</th>
<th>Section</th>
<th>Comment</th>
<th>Topic</th>
<th>Action Required/Summary of Action taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>150</td>
<td></td>
<td>General</td>
<td>The report identifies many serious existing issues in the area (such as health deprivation, the state of nature and natural capital, water quality and resources, air quality) which are expected to decline further. But the report consistently downplays these, for instance in its approach to climate change (in Para 5.2.8), and throughout its Table 6.1 SA Framework Sustainability Objectives. The report honestly and objectively assesses the impacts of the Brexit Strategy. Some of the pro-growth assumptions in the SA are already overtaken by the DfT’s 2020 National Transport Plan.</td>
<td>Baseline and Future trends section updated for SA report. Crossing referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Sustainability objectives also updated.</td>
<td></td>
</tr>
<tr>
<td>156</td>
<td></td>
<td>1.4</td>
<td>Understanding policy context and intent</td>
<td>Baseline updated for the ISA report</td>
<td></td>
</tr>
<tr>
<td>157</td>
<td></td>
<td>4.4.3</td>
<td>Although the ISA refers to intra-regional inequality, it does not address this issue in Section 5.8.8. The report is in breach of the Habitats Directive, as it fails to take into account the impacts of Brexit, which is widely expected to lead to a decline in population growth.</td>
<td>Recommendations made for TS</td>
<td></td>
</tr>
<tr>
<td>158</td>
<td></td>
<td>6.2.1</td>
<td>We take issue with many of the 'sustainability objectives' in the proposed SA framework of Table 6.1. The report does not address the transport strategy as an objective and the lack of clearly defined environmental strategies.</td>
<td>Sustainability objectives updated for ISA report but as they are for assessment purposes only, targets are not included.</td>
<td></td>
</tr>
<tr>
<td>159</td>
<td></td>
<td>3.11</td>
<td>The population projections used are important because they will drive assumptions about job numbers, potential for economic growth (though we query this as an ambition), and vehicle movements. The SA and Transport Strategy should provide a coherent explanation for the projections used, how these relate to national and local projections, and why these are still relevant post-Brexit.</td>
<td>Baseline and Future trends section updated for ISA report. Crossing referencing enhanced for ISA report to reflect interconnected nature of sustainability objectives and issues/opportunities. Sustainability objectives also updated.</td>
<td></td>
</tr>
</tbody>
</table>
The ISA process is very precautionary: tightly so, in view of protecting internationally important sites of nature conservation importance.

Where the ISA conformity notes, European guidance divide the requirements of Articles 3 to Stage 1 covering and Stage 2 appropriate assessment. If Stage 1 screening cannot show that significant effects on birds and SACs are unlikely, then the ISA must proceed to Stage 2. There is no exception for 'strategic nature'. These appearances of a plan that make decisions and impose conditions on subsequent plans and projects (i.e. the 'efficient and cost-effective implementation of the strategy') para. 1.4 of the ISA must be shown to not adversely affect the integrity of any SPA or SAC. The ISA's proposed approach would lose ISA-wide open to legal challenge.

General

Sections updated for the ISA report

The uncertainty created by the pandemic is acknowledged in the ISA. It is too early to explore specific scenarios for future, post COVID, economic recovery.

The uncertainty created by the pandemic is acknowledged in the ISA. It is too early to explore specific scenarios for future, post COVID, economic recovery.

The ISA (including the HRA) and the EEH Transport Strategy should already be promoting the strong protection of the internationally important sites, and should welcome the opportunity to throw through ISA that this is the case.

General

No action required.

General

No action required.

General

No action required.
5.10.1 Natural Capital and Historic Environment

Updated for ISA report

Sections updated for the ISA report

Observation noted.

Luton Council

5.8.7 Sustainability objectives updated for ISA report

Updated for ISA report

Sustainability objectives updated for ISA report

5.8.4 Action Required/Summary of Action taken

Luton Council

May be too related to spatial planning to feature in a TS

Luton Council

5.2.5 Question 3

Not aware of any

Not aware of any

Sections updated for the ISA report

Sections updated for the ISA report

Natural Capital and Ecosystem services

The scoping report mentions, landscape, biodiversity, ecosystem services and refers to net gain however there is little mention of Greenspace from a "people" perspective

Luton Council

Natural Capital and Ecosystem services

Sections updated for ISA report

Natural Capital and Ecosystem services

Sections updated for the ISA report

Natural Capital and Ecosystem services

Protecting and improving the situation in respect of deficiencies in general open space or recreational values or the need to protect and improve outdoor sports facilities is completely absent from the document.

Luton Council

Natural Capital and Ecosystem services

Sections updated for the ISA report

Historic Environment

There is no mention of the Act itself; issues that currently affect local transport routes or any suggestions as to how to contribute to resolving the problem.

Luton Council

Natural Capital and Ecosystem services

Recommendations made for TS

Natural Capital and Ecosystem services

Recommendations made for TS

Historic Environment

We agree with the sustainability objectives in Table 6.1. We support the sustainability objectives for Biodiversity and Natural Capital.

North Northants Joint Planning Unit

We support the integrated Sustainability Approach approach which comprises:

- Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA);
- Habitats Regulations Assessment (HRA);
- Equality Impact Assessment (EIA) and
- Community Safety Assessment (CSA).

North Northants Joint Planning Unit

The RPSU welcomes the opportunity to work with ESH and alongside other partners such as Northamptonshire County Council in developing the transport strategy as it emerges. Should you have any queries regarding this response, please do not hesitate to contact me or my named counterparts.

North Northants Joint Planning Unit

Section 6.1

We support the sustainability objectives in Table 6.1. We support the sustainability objectives for Biodiversity and Natural Capital.

North Northants Joint Planning Unit

as referenced above in relation to Biodiversity, the sustainability objective for biodiversity should recognise whatever national and local targets are in place for biodiversity net gain.

North Northants Joint Planning Unit

Community Safety

Updated for ISA report

Sustainability objectives updated for ISA report

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.

General

Noted.
Historic Environment - Sections updated for the ISA report

5.9.8

The principle opportunities for the Transport Strategy are for enhancing the understanding and appreciation of the significance of above-ground heritage assets.

This might be achieved, for example, by reducing traffic volumes, visibility and noise in the vicinity of a designated heritage asset and reducing existing detrimental effects on setting. It is particularly disappointing that the so-called ‘principle opportunity’ included in this document relates solely to built heritage and is limited to designated heritage assets. This is simply not acceptable given that the greatest impact and loss associated with the Transport Strategy will relate to non-designated, below-ground archaeological remains. The Archaeology Team would strongly object to any Transport Strategy that fails to appropriately make provision for archaeological remains and consider that it would be failing to meet with National and Local Policy.

We agree with this statement of fact and are pleased to see it included but are disappointed that there is no corresponding opportunity identified. National infrastructure projects should be led by example and this is a case where options to develop best practice in the treatment of nationally important but not designated heritage assets should be considered.

We agree with this statement of fact and are pleased to see it included but are disappointed that there is no corresponding opportunity identified. National infrastructure projects should be led by example and this is a case where options to develop best practice in the treatment of nationally important but not designated heritage assets should be considered.

The sixth bullet point of paragraph 5.9.8 states:

• the principle opportunities for the Transport Strategy are for enhancing the understanding and appreciation of the significance of above-ground heritage assets.

The fifth bullet point of paragraph 5.9.8 states:

• highly significant archaeological remains, whether designated or not, require preservation in situ. This closely has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains e.g. by avoidance and mitigation.

The fourth bullet point of paragraph 5.9.8 states:

• development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

This is an accepted statement of fact but there are no opportunities linked to this. This is a missed opportunity which is directly contrary to para 199 of the NPPF that discusses the need for development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

The third bullet point of paragraph 5.9.8 states:

• the principle opportunities for the Transport Strategy are for enhancing the understanding and appreciation of the significance of above-ground heritage assets.

This is another accepted statement of fact, but the authors would be advised to consider footnote 63 (against para 194 of the NPPF) that specifically provides guidance for dealing with non-designated heritage assets of equivalent significance to designated areas. Once again, there is no opportunity linked to this bullet point. National infrastructure projects should be led by example and this is a case where options to develop best practice in the treatment of nationally important but not designated heritage assets should be considered.

The second bullet point of paragraph 5.9.8 states:

• highly significant archaeological remains, whether designated or not, require preservation in situ. This closely has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains e.g. by avoidance and mitigation.

This is an accepted statement of fact but there are no opportunities linked to this. This is a missed opportunity which is directly contrary to para 199 of the NPPF that discusses the need for development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

The first bullet point of paragraph 5.9.8 states:

• the principle opportunities for the Transport Strategy are for enhancing the understanding and appreciation of the significance of above-ground heritage assets.

This is an accepted statement of fact but there are no opportunities linked to this. This is a missed opportunity which is directly contrary to para 199 of the NPPF that discusses the need for development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

5.10.13

Another opportunity both during upgrading existing water and sewerage infrastructure and providing new sustainable drainage solutions could be seen in considering and clearly defining long-term adaptive approaches.

5.12.2/5.12.3

References 68 and 69 are links to summary tables for 2017 and 2018 only. They do not provide the information quoted in the paragraphs

5.12.2

Another opportunity both during upgrading existing water and sewerage infrastructure and providing new sustainable drainage solutions could be seen in considering and clearly defining long-term adaptive approaches.

5.11.6

This is an accepted statement of fact but there are no opportunities linked to this. This is a missed opportunity which is directly contrary to para 199 of the NPPF that discusses the need for development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

5.9.8

The principle opportunities for the Transport Strategy are for enhancing the understanding and appreciation of the significance of above-ground heritage assets.

This is an accepted statement of fact but there are no opportunities linked to this. This is a missed opportunity which is directly contrary to para 199 of the NPPF that discusses the need for development to record and enhance understanding of the significance of any heritage assets that may be lost (wholly or in part).

5.10.5

Vigorous existing infrastructure provides the opportunity to improve pollution control on older drainage systems – features twice in an issue and opportunity. Delete from 5.10.12?

5.10.9

It is very disappointing that the so-called ‘principle opportunity’ included in this document relates solely to built heritage and is limited to designated heritage assets. This is simply not acceptable given that the greatest impact and loss associated with the Transport Strategy will relate to non-designated, below-ground archaeological remains. The Archaeology Team would strongly object to any Transport Strategy that fails to appropriately make provision for archaeological remains and consider that it would be failing to meet with National and Local Policy.

We agree with this statement of fact and are pleased to see it included but are disappointed that there is no corresponding opportunity identified. National infrastructure projects should be led by example and this is a case where options to develop best practice in the treatment of nationally important but not designated heritage assets should be considered.

We agree with this statement of fact and are pleased to see it included but are disappointed that there is no corresponding opportunity identified. National infrastructure projects should be led by example and this is a case where options to develop best practice in the treatment of nationally important but not designated heritage assets should be considered.
Highways England

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

4. Do you agree with the objectives in Table 6.1?

5. Do you agree with the policy context and baseline information presented?

Public Health

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Air Quality

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Public Health Question 2

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

General

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Public Health Question 3

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Air Quality

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Public Health Question 1

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Climate Change and Greenhouse Gases

1. Do you agree with the objectives in Table 6.1?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Air Quality

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Public Health Question 4

1. Do you agree with the policy context and baseline information presented?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?

Climate Change and Greenhouse Gases

1. Do you agree with the objectives in Table 6.1?

2. Are there any additional sustainability issues which should be identified?

3. Do you have any other comments on the approach to assessment?
Paragrap 5.10.7 refers to four locations that we ‘consider to have significant flood risk’. It is not clear where this list is from, and these do not appear to be EA priority areas. Certainly there are minor changes or additions that we think would be beneficial, which are outlined further below.

Paragraph 5.10.8 could be expanded to note that other sensitive groundwater aquifers are found outside SPZs, particularly on chalk geology. Whilst not used for public water supply, they also large areas of Flood Zone 3 in these locations.

The last sentence of paragraph 5.10.6 needs to be amended or removed. Areas of Flood Zones 2 and 3 will be found in proximity to many watercourses. This sentence makes it sound like the floods are ‘within’ Flood Zones 2 and 3.

Paragraph 5.10.9 refers to the sustainability objectives in Table 6.1. We are satisfied with the proposed sustainability objectives in Table 6.1. However, please be advised that the NPIF has been updated and strengthened in this regard and the statement “where possible” has been removed from paragraph 5.10.9.

The ‘Regional’ review should now incorporate the Environment Agency’s local Natural Capital Plan for the Oxon arc.

The references to the National Planning Policy Framework (NPPF) on page 6 still refer to providing net gains in biodiversity “where possible”. Please be advised that the NPIF has been updated and strengthened in this regard and the statement “where possible” has been removed from paragraph 5.10.9.

The flood risk baseline needs to be expanded to include all forms of flood risk, especially surface water flood risk which is likely to be the greatest flood risk issue for transport.

We are concerned at the apparent lack of plans, policies and programmes reviewed for this chapter. As a minimum, it should also include:
- Environment Agency’s approach to groundwater protection – in particular position statement C4 (Transport developments)
- Anglian & Thames Catchment Management Plans
- Thames Water Resources Management Plan (only seems to be Anglian Water included in the appendix)

The approach appears good, perhaps more clarity is required to objectively provide ‘a robust assessment of the Transport Strategy’. The analytical approach to how these or more measured/better identified (biodiversity/environmental) gain and natural capital & ecosystem services, and especially support natural capital having its own Strategic Environmental Assessment (SEA) chapter. We are also pleased that climate change issues have been better identified in the scoping report.

We have reviewed the ‘key messages’ from the review (Table 6.1). The third bullet of ‘Water Environment’ refers to requirements for ‘essential infrastructure’ based in Flood Zone 3a and/or 3b. This should include that any such proposal would also need to demonstrate that it can pass both parts of the flood risk Exception Test (https://www.gov.uk/guidance/flood-risk-and-costal-erosion/the-exception-test-section).

Appendix C

Water Environment: “To protect and where possible improve water quality to ground and surface waters and manage and reduce the risk of flooding from all sources.”

Biodiversity: “To protect and enhance protected habitats and species, valuable ecological networks and ecosystem functionality in the region, contributing to biodiversity net gain.” – we are unclear why the objective only seeks to protect and enhance protected habitats and species, the implication being that wet green would only need to be provided for protected sites, which is not the case. The objective should be seeking to protect and enhance all biodiversity habitats and species, with a particular focus on protected species and habitats.

Water Environment: “To protect and where possible improve water quality to ground and surface waters and manage and reduce the risk of flooding from all sources.”
Do you have any other comments on the approach to assessment?

You need to ensure that where it is appropriate, you are making linkages between the SIA/GIA chapters. For example, there may be strong linkages between the Natural Capital and other chapters (e.g. Water Environment and Air Quality).

You also need to ensure that the strategy links to and is in line with the strategic objectives of the wider OxCam growth arc. We note that the policy review included for example the NIC report 'Partnering for Prosperity'. You should continue to review and assess new OxCam policy and ambitions as they emerge over the coming months and reflect in your assessment.

Further engagement

As we noted in our response to the Outline Transport Strategy, we would be keen to continue to engage with you as the strategy develops. In particular, we can offer specific advice and guidance on matters including biodiversity and environmental net gain and flood risk. Please contact us so that we can discuss our ongoing engagement with your strategy.

The opportunity to introduce measures and schemes that deliver safer and more attractive walking and cycling infrastructure—e.g. re-allocation of road space, new cycle routes etc—should be general. It would be useful to give the example of the East West Rail project’s commitment to Biodiversity Net Gain here.

Under the duty of regard, the purpose of AONB designation should be taken into consideration at all stages of the EEE Transport Strategy process, from initial thinking through to detailed planning stages and implementation. In particular, as indicated in the response of the Chilterns Conservation Board (in relation to paragraph 5.16 of the ISA Scoping Report), AONB considerations should be a prime initial determinant for transport schemes in the AONBs, other just being used to either mitigate the impact of planned schemes.

It is important to note that the duty of regard applies to development outside the AONBs (where such development has the potential to have an adverse impact on the purpose of AONB designation), as well as to development within the AONBs.
There should be more detail on this section on flood risk, particularly on surface water flooding, and how it could impact on the planning and delivery of transport measures. Further mapping would be useful.

A further issue is the adverse impacts of air quality on biodiversity and/or sensitive conservation sites.

It would be useful to state key trunk road routes here as well- e.g. A14, A34, A43.

The opportunity for public transport improvements, both rail (e.g. VLR) and bus services, to contribute towards air quality improvements through reducing car journeys, especially if they operate using low emission rolling stock or electric vehicles (e.g. electric buses).

The opportunity for uptake of active and healthy travel to improve air quality, particularly in towns and cities across EEH.

The opportunity to better manage air quality at the local level through new Local Air Quality Management (LAQMs), as included in the 2020 Environment Bill.

The opportunity for public transport improvements, both rail (e.g. VLR) and bus services, to contribute towards air quality improvements through reducing car journeys, especially if they operate using low emission rolling stock or electric vehicles (e.g. electric buses).

The opportunity for uptake of active and healthy travel to improve air quality, particularly in towns and cities across EEH.

Water environment: regional:

- New or/and upgraded transport infrastructure across the EEH region has the potential to affect the survival, fabric, condition and setting of above and below ground designated and undesignated cultural heritage assets both known and unknown.

- In the new Environment Bill, it is suggested that the sustainability objectives set out for reference water supply, as well as for water supply under CUA, are considered to be consistent with the sustainability objectives of the Environment Bill.

- It is suggested that the third bullet of this table under ‘key sustainability issues identified’ is changed to the following:

- To reduce the number of long-distance trips (see comments below).

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Water environment: national:

- As well as the Thames Water Resource Management Plan, please can the Environment Agency provide the Environment Agency’s Water Resources 360 Water Resource Management Plan?

- In general, the policy context has been thoroughly researched, as evidenced in Appendix C. However, there is no evidence of any policy conflicts or significant policy gaps with other transport and/or development plans.

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Buckinghamshire Council agree with the baseline presented in sections 6 (Biodiversity) and 7 (Historic Capital and Ecological Services). Paragraph 5.4.d. makes reference to impacts on habitats sensitive to air quality. It is recommended that a sentence is added to acknowledge the potential impacts of nitrogen oxides specifically. BC trust this will be included in the HRA with regards to designated sites.

Are there any additional sustainability issues which should be identified?

- One objective should be to reduce the overall number of flaring distance trips where shorter ones were preferable. This would both increase support for the decarbonisation objective by reducing emissions on source, and would also draw stronger links between housing and transport planning. Following water calls from ODI and sustainability issues to do so.

A second potential objective would be around energy use, either seeking to reduce this through innovative practices such as car-sharing schemes, or through use of transport corridors (i.e. major roads) as sites for renewable energy generation. This would address the points raised in the HRA review around the need to create low carbon economies.

320. Buckinghamshire Council

Sustainability Objectives

BC recommends amending the Historic Environment Sustainability Objective to read: “To protect and enhance heritage assets and the character of the Heartland's built and historic environment”.

Policy and Equities

Already supportive of the points raised by this objective. However, reliance on transport is also a barrier to access; for roads in terms of upheaval caused by maintenance, and for public transport in terms of general punctuality.

Community Safety

i. Ideally this objective would support the Equalities objective through emphasising that greater connectivity should be achieved for all users.

Health

iv. This objective is also disconnected from the Policy Review, in that it does not bring forward the need to promote a low carbon economy, or that growth should be managed sustainably.

Sustainability Objectives

Public Health

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<table>
<thead>
<tr>
<th>No.</th>
<th>Reviewer Initials</th>
<th>Section</th>
<th>Comment</th>
<th>Topic</th>
<th>Action Required/Summary of Action taken</th>
</tr>
</thead>
</table>
| 327 | Buckinghamshire Council | 2.1.4 | A. Do you have any other comments on the approach to assessment?  
   B. The scope for net zero carbon emissions from transport needs clarification:  
   Is this for surface transport only, or does this apply to air travel as well?  
   What are the journey origins and destinations? Does this include internal travel within EEH, or travel to other regions?  
   Does this cover all emissions scopes? (i.e., direct emissions only, or Scope 2 emissions (particularly in light of a likely shift toward electric mobility).  
   *actions: eg. added text underlined*"achieving net-zero carbon emissions across all scopes from transport trips with origins or destinations within EEH no later than 2050" | Climate Change and Greenhouse Gases | Recommendations made for TS |
| 328 | Buckinghamshire Council | 2.1.11 | It is surprising that the MK Strategy for 2050 is not mentioned here. | General | Sections updated for the SA report |
| 329 | Buckinghamshire Council | 2.1.12 | This should be updated to reflect the position of the ES2 Strategic Roads Network Strategy, i.e., the pausing of further work on the Expressway. | General | Sections updated for the SA report |
| 330 | Buckinghamshire Council | 5.2.5 | Action: Update to reflect current status of Expressway. | Population and Egalities | Sections updated for the SA report |
| 331 | Buckinghamshire Council | 5.2.6 | It might be worth clarifying the baseline for non-religious individuals, i.e., does this include stated "atheists", "no religion" etc. Recent precipitous growth in the number of non-religious individuals is significant as it could have implications for travel patterns (e.g., fewer restrictions on travel during holy days). | Population and Egalities | As long as there are religious reasons to travel, even by a small minority, then these would need to be taken account of in line with Equality duties; no proportion is set relevant. |
| 332 | Buckinghamshire Council | 5.2.7 | Action: Add suggested major transport routes. | Landscape and Townscape | Sections updated for the SA report |
| 333 | Buckinghamshire Council | 5.2.8 | Other major tourist attractions could include:  
   - Various stately homes, such as Waddesdon Manor (which has severe congestion at key times of year such as Christmas)  
   - Several National Trust sites  
   The dispersed nature of these goes some way to support the statements elsewhere in the document regarding the rural nature of much of the region.  
   *actions: Mention dispersed tourist attractions such as stately homes.* | Landscape and Townscape | Sections updated for the SA report |
| 334 | Buckinghamshire Council | 5.4.13 | Enhancing walking cycling and horse riding routes could be included as well as at 5.7.14. | General | Sections updated for the SA report |