

Oxfordshire Plan 2050 - SA Scoping Report Consultation, March 2019

Response on behalf of the Oxfordshire Environment Board

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?*

Overall, we believe the SA should reflect a strong ambition for the environment.

The environment is important to people that live and work in Oxfordshire it provides quality of life, clean air, water. The benefits and needs are well articulated in previous responses but not recognised in Oxfordshire's current strategies and plans.

Oxfordshire's ambition should extend beyond environmental protection and the traditional thinking, and into environmental improvement using understanding and quality of ecosystems to define impact. This will ensure compliance with the National Planning Policy Framework (NPPF) which states in paragraph 170 that 'Planning policies and decisions should contribute to and enhance the natural and local environment by...d) minimising impacts on and providing net gains for biodiversity...'. Paragraph 174 says that 'To protect and enhance biodiversity and geodiversity, plans should: ...b) ...identify and pursue opportunities for securing measurable net gains for biodiversity...'.

As a minimum, the Oxfordshire Plan 2050 should commit to a clear target for net environmental gain that reflects Oxfordshire's ambition and value of the natural world.

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

We would expect to see the following additional plans, policies or programmes included:

- **Government's 25 Year Environment Plan** which sets out Government commitment and ambition for the natural world
- **Natural Capital Committee** reports and recommendations
- **Oxfordshire State of Nature 2017 report**. Led by Wild Oxfordshire, this draws together a wealth of expertise from the county's professional and volunteer base in biodiversity and nature conservation, including our local authorities. It uses the best information available to establish a picture of the state of Oxfordshire's natural habitats and species, including long-term trends as well as more recent losses and gains.

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

- **Conservation Target Areas**, which are the current spatial component of Oxfordshire’s strategic approach to biodiversity. They are some of the most important areas for wildlife where targeted conservation action can secure the maximum biodiversity benefits.
See: <https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/>
- **Area of Outstanding Natural Beauty Management Plans** (Cotswolds, Chilterns, North Wessex Downs) - these plans should be a material consideration in creating Oxon 2050 to ensure it meets the national policy requirement of giving great weight to the conservation of landscape and scenic beauty in these areas. Supporting achievement of these plans helps ensure the county and districts are fulfilling their statutory duty to care for the AONBs.
- **Oxfordshire’s historic landscape characterisation**
- **South Oxfordshire District Council Green Infrastructure Strategy** which maps and describes green infrastructure requirements and opportunities (as an example of what is needed to inform a green infrastructure plan.

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

We are concerned that much of the information presented reflects a static picture of the status quo, rather than a mapping and assessment of trends (both positive and negative) that would be more appropriate for fulfilling the requirements of a Strategic Environmental Assessment.

By focussing only on designated sites (Paras 3.87-3.89) 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 the ecosystems on which we and nature depend. The approach being taken is one that may have been appropriate 20 years ago, but not today and not in the context of future development plans.

Government guidance <https://www.gov.uk/guidance/natural-environment> lists the local ecological networks evidence that should be identified and mapped. As far as we can tell, not all of these have been included in the Scoping Report and we strongly recommend they are included. These comprise:

- areas of **irreplaceable natural habitat**, such as ancient woodland or ancient hay meadows, the significance of which may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation;

- habitats where specific land management practices are required for their conservation;
- main landscape features which, due to their linear or continuous nature, are important for the migration, dispersal and genetic exchanges of plants and animals, including any potential for new habitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species dispersal;
- areas with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change or which could assist with the habitats shifts and species migrations arising from climate change;
- an audit of green space within built areas and where new development is proposed.

We would certainly expect to see analysis of the potential for habitat enhancement and/or restoration in order to improve connectivity or increase area (the *more, bigger, better, joined* principles of the Lawton Review ¹).

We would also expect clearer recognition of the value of accessible natural green spaces and their contribution to health and wellbeing, as well as ecological benefits, and an assessment of how capacity in this area could be extended.

The current baseline data is out-of-date and incomplete.

The most up-to-date and highest quality data currently available is accessible from the Thames Valley Environmental Records Centre (TVERC). This includes species data, priority habitats (and potential priority habitats) mapped to field level, all designated sites (Local Wildlife Sites, District Wildlife sites, Ancient Woodland etc) and connectivity analysis for grassland, woodland and wetland. This data is updated every 4 months for species and annually for other data.

Analysis will be required to provide assessment of and mapping for natural capital. The above information could inform a plan for ecosystem services provision. Both will be needed for the OP2050: for instance, for considering services such as water, flooding and provision of water for new homes and achieving clean air standards in towns and the city.

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

The continued loss of biodiversity across Oxfordshire is a major concern; ecosystems and ecosystem services and some key components of the ecological network, including irreplaceable habitats, will be impacted by the planned infrastructure and housing.

¹<https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

Access to natural green space - The plan needs to address the issue of people not being able to benefit from access to natural greenspace. Access to green space is needed to ensure health and wellbeing particularly physical and mental health. There is a recognised lack of accessible natural greenspace in Oxfordshire, according to Natural England Access to Natural Greenspace Standards. According to analysis carried out by TVERC on behalf of Oxfordshire County Council in 2017², 63% of households in Oxfordshire do not have access to a 2-hectare accessible green space within 300 metres. The analysis also shows that no residences have access to a 500-hectare accessible green space within 10 kilometres.

Light Pollution & Dark skies - The Oxfordshire Plan 2050 has the potential to 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 which, as well as being a key aspect of natural beauty are important for wildlife, heritage settings and human health.

Ecosystem services and natural capital - NPPF paragraph 171 says that plans should ‘... plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’ The Oxfordshire Plan 2050 needs to take a coherent strategic approach to enhancing natural capital across the county, and also take into account natural capital in neighbouring counties, ensuring landscape and habitat connectivity.

Natural capital has been defined as “the elements of the natural environment which provide valuable goods and services to people”. It is now well understood across all sectors that the effective management of natural capital is an environmental necessity that underpins a thriving economy and a healthy population. SEEIP and The State of Nature in Oxfordshire both identified that the extent and condition of many of the county’s natural capital assets have been declining over the course of decades, with major challenges including air and water pollution, land contamination, fragmentation of habitats and a decline in biodiversity. We know that planned development will impact on our natural environment and the benefits we derive from it. The key questions for the Oxfordshire Plan 2050 are ‘What will the impact of the development be?’, Can the plans be modified to avoid or reduce impact and safeguard ecosystems? If not what plans need to be actioned to ensure the entirety of these natural features and functioning ecosystems are recreated elsewhere?’ and ‘By what mechanism will this be funded?’

If these questions cannot be answered, then either the development proposals should change or the Plan will fail in its environment, legal and moral obligations. An Environmental Investment Plan (EIP) will provide answers, in line with Natural Capital Committee¹⁰ recommendations, that changes in natural capital should be measured, valued, reflected in corporate and national accounts, and taken into account in decision making processes.

The Oxfordshire Plan 2050 should include a strategic approach to investing in natural capital to offset the impacts of proposed development as well as improving

² Carpenter et al. 2017. An Analysis of Accessible Green Space Provision in Oxfordshire. Thames Valley Environmental Records Centre

the delivery of the vital goods and services on which the current and future residents of Oxfordshire rely for their health, well-being and prosperity.

Para 4.24 rightly recognises the role of the statutory environmental bodies such as Natural England and the Environment Agency. We believe it would also be appropriate to highlight the role of non-statutory organisations, including members of the Oxfordshire Environment Board (see below), that undertake vital professional work that could helpfully inform the Oxfordshire Plan 2050.

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?

We welcome the commitment to net gain in biodiversity, however it requires further clarification and specification. It is essential that the mitigation hierarchy is applied so that, in the first instance, avoiding damage is a clear and transparent requirement.

Oxfordshire 2050 should commit to implementing a system for secure measurable net gains for biodiversity through the planning system, as required by the NPPF. A minimum percentage increase should be specified to reflect the value Oxfordshire places on the natural world and the support services provided for our health and wellbeing. The basic prerequisites for this must always be to follow the mitigation hierarchy (i.e. avoid harm where possible first) and use the expertise and judgement of an in-house local authority ecologist.

Table 5.1 - 15 (Landscape Character) should reference not just protection but the 'enhancement' of landscape (a statutory duty of AONBs). 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?

As noted at Para 4.2, the Oxfordshire Infrastructure Strategy in 2019 identified the lack of a green infrastructure strategy for the county. It appears that the Oxfordshire Plan (Para 2.3) intends to rectify this but there is no detail as to how this process will be taken forward.

The Oxfordshire Environment Board recognises the need for a Green Infrastructure Strategy and Plan for the county and for this to be integrated into all other long-term development strategies as a priority if Oxfordshire is to achieve genuinely sustainable economic growth, visionary place-making, and remain a healthy and attractive destination for people and business.

We would be happy to work with those involved in the Oxfordshire Plan 2050 and the SA to discuss how this could best be achieved.

About the Oxfordshire Environment Board

The Oxfordshire Environment Board is an alliance of professional organisations concerned with the promotion, restoration and enhancement of the natural environment of the county.

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